

August 21, 2012

VIA E-MAIL (director@englishcenter.edu)

Ms. Marcy Jackson, Director The English Center 66 Franklin Street, Ste. 300 Oakland, CA 94607

> Re: Interim Report Reviewed; Additional Interim Report Required; Institutional Show Cause Issued ACCET ID #0073

Dear Ms. Jackson:

At its August 2012 meeting, the Accrediting Commission of the Accrediting Council for Continuing Education & Training (ACCET) reviewed the institution's interim report submitted in response to the April 2012 Commission action letter dated April 24, 2012, resulting from a Quality Assurance Unannounced Visit (QAV) team report (visit conducted on February 15, 2012). That action directed the institution to submit an interim report to include the following three items: 1) an update on the \$50.00 Placement Deposit/Exit Packaging Fee charged to students who do not complete an exit program package and are not employed within 90 days to include revised policies, procedures, and Student Handbook references (addendum insert acceptable) relating to Exit Packaging to eliminate the deposit/fee; 2) updated Document 28.1s for the period January 1 to December 31, 2011 and for the first quarter of 2012 (January 1 to March 31, 2012) for all programs together with supporting documentation for all placements and waivers, and a narrative update to include an explanation of why the institution has been tracking only those cohorts in the 16 and 32 week program, an update on progress made toward the design and implementation of the Access database tracking system, an update on progress made toward identifying a single database to track completion and placement data, and a sample of five each of the revised self-employment and verification forms; and 3) an update on the Healthcare Careers Program indicating that either the institution is seeking program approval for this program through ACCET or it is being discontinued.

Upon its review of the institution's interim report, dated June 29, 2012, the Commission determined that item #3, as noted above, was satisfactorily addressed with an updated catalog description. However, the Commission is seriously concerned over the institution's failure to provide an update regarding its \$50.00 Placement Deposit/Exit Packaging Fee, a charge which the Commission believes is inconsistent with Document 2 – <u>Standards for Accreditation</u> and Document 28 – <u>Completion and Placement</u>, undermining the credibility of the institution's placement data and placing a burden on those students who can least afford it. In addition, the Commission is very concerned over the institution's continued failure to provide completion and placement data for all programs in the Academic and Professional Program and for the 8- and 24-week programs in the Career Readiness Program. The institution did not provide any Document 28.1s or updates on its database development for tracking completion and placement in its response to the interim report

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directive. Although placement information for all programs was required for the interim report, the institution submitted only On-Site Sampling Verification Forms and documentation for the 16- and 32-week Career Readiness Program. It is noted that in its response to the QAV team report, the institution stated that it was not submitting completion and placement information for its 8-week Career Readiness Program because the students were all ATB candidates; however, that does not serve as an exception to submitting completion and placement information for ACCET. The documentation submitted in the Interim Report indicated that the majority of graduates were placed into part-time or self-employment positions; however, no attestations for these types of employment were provided, and students with continuing employment had no attestation for increased responsibility, salary increase, or a promotion. The institution's employment verification system was inconsistent, as some verifications consisted solely of a paycheck with no dated written verification by either the employer or the institution. Further, the part-time work acquired by some students consisted of severely limited hours each week; the placements were not consistently verifying 30 days of work as definitively delineated in Document 28, and it would have been exceedingly difficult for some students to reach 30 days of work within three consecutive months given the hours per week indicated. The Commission is also concerned over the large amount of Column 5b completers calculated from the On-Site Sampling Verification Forms provided in the interim report. Column 5b completers comprised over 40% of the total completions in the 32-week Career Readiness Program in 2011, which, coupled with the other issues with placement, requires both explanation and responsiveness. The seriousness of these issues, combined with the institution's failure to respond to the Commission's clearly stated concern regarding the Placement Deposit/Exit Packaging Fee, resulted in the Commission voting to issue an Institutional Show Cause directive requiring the institution to show cause why its accreditation should not be withdrawn due to its failure to fully address the issues as directed in the Commission's previous action letter, dated April 24, 2012, and serious concerns over the institution's ability to systematically and effectively place its students at or above ACCET benchmarks and reliably document and track completion and placement.

Accordingly, the Commission directed that an additional interim report is required, which must include the following specific items:

- 1. An update on the \$50.00 Placement Deposit/Exit Packaging Fee, to include revised policies, procedures, and Student Handbook references (addendum insert acceptable) to evidence the elimination of the deposit/fee.
- 2. A comprehensive narrative explaining why the institution has not been tracking any of the programs in the Academic and Professional Program or the 8- and 24-week programs in the Career Readiness Program, along with a progress update and supporting documentation on the database the institution has been developing to track its completion and placement.
- 3. Updated Documents 28.1 <u>Completion and Placement Statistics</u> for the calendar year 2011 and January 1 June 30, 2012 for all programs, together with full supporting documentation for all placements and waivers referenced to the attached <u>On-Site Sampling Verification: Completion</u>, <u>Placement, and Academic Data</u> form for each Scheduled to Graduate (column 3) cohort on the respective 28.1s to be submitted with your response. The institution is reminded that the required documentation elements for verification of employment are outlined in ACCET

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Document 28 – <u>Completion and Placement Policy</u>. The institution is further directed to provide a detailed explanation for the large number of vocational ESL Column 5b completions, that is, students who dropped the program but were placed in training-related positions, listed on the <u>On-Site Verification</u> form submitted in response to the previous Commission action letter.

A copy of this report, **including the attached interim report cover sheet**, must be emailed to **interimreports@accet.org** no later than **October 26, 2012**.

As a reminder, please be advised that late submission and receipt of documents and reports are subject to significant late fees in accordance with Commission policy. These fees are outlined in ACCET Document 10, which can be found at www.accet.org.

Further, while under a Show Cause directive, the institution is restricted from making any substantive changes including, but not limited to, new programs, major program revisions, new branch campuses or other new sites, or relocations out of the general market area.

Your demonstrated capabilities and commitment are essential to a favorable outcome in this process, and the Commission's issuance of an Institutional Show Cause is intended to serve as a clear and compelling indication of the need for some deeper institutional review and renewal. Should you have any questions or need further assistance regarding this letter, please contact the ACCET office at your earliest opportunity.

Sincerely,

Roger J. Williams Executive Director

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Enclosures: Interim Report Cover Sheet On-Site Sampling Verification: Completion, Placement, and Academic Data form

c: Ms. Kay Gilcher, Director, Accreditation Division, USDE (aslrecordsmanager@ed.gov) Ms. Martina Fernandez-Rosario, ACD- San Francisco/Seattle, USDE (martina.fernandezrosario@ed.gov) Mr. Ron Bennett, Director, School Eligibility Service Group, USDE (ron.bennett@ed.gov) Mr. Louis Farrell, Director, SEVP, DHS/ SEVP (louis.farrell@ice.dhs.gov) Mr. Alejandro Flores, School Certification Branch, Acting Chief, DHS/SEVP (Alejandro.Flores@ice.dhs.gov) Joanne Wenzel, Deputy Bureau Chief, CA BPPE (joanne_wenzel@dca.ca.gov) USDE Accredited Schools Directory (AccreditedSchoolsList@westat.com)