



ACCREDITING COUNCIL FOR CONTINUING EDUCATION & TRAINING
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December 21, 2012

VIA EMAIL
(info@aec.edu)

Mr. Kenneth Policky
Dean of International Studies
American English College
111 North Atlantic Boulevard, Suite #112
Monterey Park, CA 91754

***Re: Reaccreditation Deferred;
Interim Report Reviewed;
Institutional Show Cause Continued;
Interim Report Required;
ACCET ID #1145***

Dear Mr. Policky:

At its December 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 August 29, 2012 Commission action letter. That action deferred further consideration of the institution's application for reaccreditation, initially considered at the August 2012 meeting, continued the institution's accredited status pending a subsequent review at its December 2012 meeting, issued an Institutional Show Cause order, directing the institution to show cause why its accreditation should not be withdrawn due to the number of weaknesses found in the reaccreditation on-site team report and the institution's response to that report, and directed the institution to submit an interim report to include the following seven items: 1) an update on the results of its October management meeting and, with it, a copy of a new long-term plan that meets all requirements of this Standard I – C: Planning; 2) a comprehensive narrative update on the issue of asylum seekers, including what steps it had taken to prevent students or agents from undermining the integrity of the institution's admissions process. The institution was directed to conduct an analysis of those students who were admitted by the school to include; a) determining from which agents they were referred; b) the rate of no-shows from these agents as compared to the school's overall average of no-show; c) the attendance pattern for those who did enroll; and d) the average length of stay compared to the length of stay for which they applied and the average length of stay for all students at the institution. The institution was to notify the Commission as to what steps it had taken to disassociate the institution from those referral sources that were misusing the school's authorization to issue Forms I-20 and to provide copies of all correspondence with the Department of Homeland Security and the U.S. Consulates in China from which these students were obtaining visas advising them that a disproportionate number of students were entering the United States using student visas and were applying for asylum while not pursuing educational goals as required by the F-1 visa program; 3) copies of the written policies and procedures that govern when and how annual performance appraisals and quarterly classroom observations of instructors were conducted. Further, it was to provide copies of all annual reviews for faculty and staff as evidence that these policies and procedures were systematically and effectively implemented. This required rescheduling the reviews from

the planned December timeframe in order to meet the deadline for this interim report; 4) the institution was to demonstrate that it provided adequate academic direction to its instructors beyond the mere understanding that a particular text is to be covered in its entirety including submission of a narrative describing in more detail the manner in which learning objectives from the institution's courses were correlated with elements from the textbooks used, and explaining exactly how testing materials from those texts are integrated into the new, objective grading system. The institution was to provide as supporting documentation a list of each course for each of the institution's levels, a copy of each course's syllabus, and a copy of the table of contents from each of the textbooks in use. The institution was to also provide a sample of five different actual assessment instruments recently used by instructors of various courses (labeled as to instructor name, course name, and level), together with corresponding examples of materials from the textbooks used to create/inspire each assessment. Finally, the institution was to provide examples of the Director of Education's formal "review prior of writing tests" developed by instructors along with student grade reports that demonstrated the systematic and effective implementation of the new grading system, at least three from each course taught between June 1 and October 31, 2012; 5) a narrative update on its progress towards hiring and training a new DOE along with a detailed analysis of potential causes and solutions for prior low retention at this position. The institution was to demonstrate that the DOE has sufficient qualifications, authority, and allocated time to provide oversight to all programs; 6) a narrative update including documentation that demonstrated the systematic and effective implementation of the Change of Class form and the process for management approval over decisions concerning academic progression with examples of five completed forms; and 7) student file documentation as available that demonstrated the new procedure, plus copy of a revised policy document directing the new procedure and evidence that it was distributed to relevant staff. As for the student files, these included both SEVIS printouts and academic records – grade reports, attendance records, warning letters, change of status documents – for students terminated since the team's visit.

Upon its review of the institution's interim report, dated October 23, 2012, the Commission determined that items 1 and 4, as noted above, were satisfactorily addressed; however, the Commission voted to defer further consideration for an additional review cycle, continue the institution's accredited status pending a subsequent review at its April 2013 meeting, continue the Institutional Show Cause directive, and require an additional interim report, which must include the following specific items:

1. A narrative update and analysis, with supporting documentation, related to the asylum seeker issue for the period beginning October 30, 2012 – March 1, 2013, with specific reference to the following: a) the number and names of students who have been terminated due to their pursuit of asylum during this time period; b) identification of the source of each of the students (online application vs. transfer); c) an analysis of the effectiveness of the institution's admissions and enrollment attestation, including a comparison of the previous period of evaluation (April 2011 – September 2012) of the number of asylum seekers as a percentage of the institution's student population during those respective periods of enrollment; d) if the previous trend of students pursuing asylum has not ceased, item (c) is to be expanded to include an in-depth analysis of the student population pursuing asylum as follows: profile of the students, legal

representation, and any pattern or commonalities related to the student population pursuing asylum; and e) an update on any additional measures being implemented by the institution in the event that the current measures have not demonstrated sufficient effectiveness in seriously diminishing or altogether ceasing this trend.

2. In its response, the institution provided copies of six (6) faculty evaluations, three (3) staff evaluations and three (3) management evaluations. Upon review of the class room observations, the Commission noted that they were little more than checklists of items and lacked any substantive and insightful observations which would provide constructive feedback. Further, the Commission noted there was little evidence of follow-up with individual faculty to help develop or enhance their teaching skills. Therefore, the institution is directed to provide a narrative update with supporting documentation demonstrating the systematic and effective implementation of revisions to strengthen the institution's personnel management policy and procedures in practice over time, with specific reference to documenting the effectiveness of employee evaluations and appraisals as related to professional development, and instructional or performance guidance and feedback, neither of which were evident in the Commission's review.
3. In an updated submission to the interim report, the institution indicated that it had hired a new Director of Education but did not provide a copy of the job description, ACCET Document 6, or a detailed plan for her orientation and training for this position, all of which must be provided along with a narrative update on the Director of Education, including a list of priorities and accomplishments relative to improving instructional delivery.
4. In its response to the Commission's concern relative to students progressing through the institution's program in a non-sequential manner, the institution provided two "Change of Class" forms, one for teachers and one for students to complete. Not included with forms were any policies and procedures for their systematic and effective implementation, nor did it include the criteria used for approving or denying such requests. Therefore, the institution is to provide a narrative update on this issue to include policies and procedures for implementation, the criteria used in reviewing such requests, and a sample of five completed Change of Class requests accompanied by the rationale used for the institution's decision, as evidence that these new forms have been systematically and effectively implemented in practice over time.
5. In its response to the Commission's concern relative to the institution's attendance-related termination policy, the institution provided a screen shot of a SEVIS document describing reasons for termination in SEVIS, a list of 13 students who have been terminated for poor attendance, and a signed list of staff who attended a training session on the new attendance policy. Not included in the response was a copy of the attendance policy as indicated in the institution's response, nor did it include any supporting documentation from the student files for the 13 terminated students such as SEVIS printouts and academic records – grade reports, attendance records, warning letters, change of status documents – for students terminated since the team's visit as requested

in the August 29, 2012 Commission action letter. Therefore, the institution is to provide an update on this issue to include supporting documentation for the 13 students referenced in the institution's interim report response as well as the same documentation for any additional students who have been terminated for attendance reason for the period November 1, 2012 through February 28, 2013 as evidence that this new policy and procedure has been systematically and effectively implemented in practice over time.

A copy of this report, **including the attached interim report cover sheet**, must be emailed to **interimreports@accet.org** no later than **March 1, 2013**.

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.

While the issuance of an Institutional Show Cause directive is not an adverse action and is explained in ACCET Document 11 - Policies and Practices of the Accrediting Commission, available on our website at www.accet.org, it represents a serious level of concern by the Commission related to non-compliance with ACCET standards, policies and procedures that place the institution's accredited status at risk. 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 in support of your institution's accredited status are essential to a favorable outcome. Should you have any questions or need further assistance regarding this letter, please contact the ACCET office at your earliest opportunity.

Sincerely,



ELECTRONIC SIGNATURE

Roger J. Williams
Executive Director

RJW/eyl

Enclosure: Interim Report Cover Sheet

cc: 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)
Ms. Joanne Wenzel, Deputy Bureau Chief, CA BPPE (joanne_wenzel@dca.ca.gov)