



ACCREDITING COUNCIL FOR CONTINUING EDUCATION & TRAINING
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September 3, 2010

VIA EMAIL & FEDERAL EXPRESS
(daniel@ccmcollege.com)

Mr. Daniel Brummel
Accreditation Coordinator
California College of Music
42 South Catalina Avenue
Pasadena, CA 91106

*Re: Initial Accreditation Denied
(Appealable, Not a Final Action)
ACCET ID #1285*

Dear Mr. Brummel:

This letter is to inform you that, at its August 2010 meeting, the Accrediting Commission of the Accrediting Council for Continuing Education & Training (ACCET) voted to deny initial accreditation to the California College of Music, located in Pasadena, California.

The decision was based upon a careful review and evaluation of the record, including the institution's Analytic Self-Evaluation Report (ASER), the on-site visit team report (visit conducted June 2-3, 2010), and the institution's response to that report, dated July 28, 2010. It is noted that a number of weaknesses cited in the team report were adequately addressed in the institution's response and accepted by the Commission. However, the Commission determined that the institution has not adequately demonstrated compliance with respect to ACCET standards, policies, and procedures relative to the following findings:

1. Standard I-C: Planning

The institution did not demonstrate that it has sound business plans that support the mission, facilitate the accomplishment of the institutional goals, and include measurable results identified for subsequent evaluation.

The team noted that strategic planning documents lacked detail in measurable results for subsequent evaluation. The revised plan was clear on the desired direction of the school and included added detail on some measurable results for individual objectives, but the Commission remained concerned that some of the measurement criteria added to the plan is subjective or outside the control of the school personnel, at least as delineated by strategies present in the planning document. For example, the Commission noted that the later stages of the plan are based on receiving accreditation and grants, but with little strategy outlined as to what the institution must do to secure such items. The Commission also noted that some of the objectives listed reveal a fundamental contradiction in the vision and planning process: specifically, the short term "Executive" objective of ACCET accreditation and the long term "Educational" objectives of expanding program offerings to the Associate of Arts and Bachelor of Arts levels by 2011 and 2012, respectively. Addition of such programs would violate ACCET's scope of accreditation, which currently extends only to the Occupational

Associates Degree level. Therefore, a coherent and effective strategic planning process was not sufficiently in evidence.

2. Standard II-A: Governance

The institution did not demonstrate that the senior management team ensures the institution's compliance with statutory, regulatory, and accreditation requirements.

The team noted discrepancies between the official names and stated lengths of the institution's program offerings as described on internal documents and on various official documents registered with the State of California, the federal SEVIS system, and ACCET. The team also cited deficiencies and omissions among the institution's procedures for tracking and documenting the status of F-1 and M-1 visa students. The institution's response provided evidence of improved consistency in the use of official program names, but failed to confidently demonstrate compliance with reporting requirements to SEVIS, including systematic and effective implementation of revised student tracking processes. While Intensive English Program has been added to the institution's list of Courses of Study on the I-17, item #5 on that same document still does not reflect that the institution is engaged in Language Training, as noted by the team. Further, the response included updated policy and procedure documents for student tracking and a SEVIS In-Status Checklist, but it provided no completed examples of the checklist actually in use from student files, and systematic and effective implementation can only be evidenced over time.

3. Standard IV-A: Educational Goals and Objectives

The institution did not demonstrate that its Intensive English Program includes sufficient and appropriate knowledge and skill elements to ensure adequate preparation for the expected performance outcomes, which have themselves been in question.

The team raised concerns over an inconsistency between the objective of the Intensive English Program as stated by the institution and as understood and implemented by the Department Chair/Instructor. The latter reported that the program existed solely for the purpose of preparing non-native speakers to matriculate into the institution's music programs and that the IEP is not a stand-alone program. The institution's written objectives, on the other hand, indicated that the language training could be taken for purely personal development reasons. In its response, the institution clarified that its prior written objectives are correct and supplied a signed statement from the Department Chair/Instructor attesting that he was aware of and in agreement with these objectives. However, the Commission finds no basis upon which to dismiss the Team's concern over an issue so central to an educational program's focus, namely its objectives. Further, the response failed to indicate if this agreement by the Chair has resulted in changes to his approach to, or delivery of, the IEP program or simply a concession to the interest in closing the matter. Further, no documentation was provided to demonstrate whether or how the Intensive English Program has changed in the details or direction of its practice, in the context of the now-clarified overall program objective. The current implementation of this program in compliance with this standard cannot be confidently assessed at this time.

4. Standard IV-B: Instructional Materials

The institution did not demonstrate that its program materials, including syllabi, lesson plans, instructional guides, and texts demonstrate the appropriate scope, sequence, and depth of each program or course in relation to the stated goals and objective, nor that they are up-to-date, readily available, and facilitate positive learning outcomes.

The team reported that the majority of courses for the Music and the Artist Development programs relied solely on materials created by the Department Chairs and Instructors and utilized no published texts or associated teaching aids and evaluation instruments. The team noted only two courses based on published texts and using published evaluations. The institution responded that its Chairs for these two programs have produced a Revised Curricular Book List, of more than thirty appropriate published texts that have been added to the curriculum so that more than 70% of all Music and Artist Development courses now include required texts. However, the Commission was not in a position, based just on the titles from this list, to evaluate whether these choices represent up-to-date and appropriate works that will facilitate positive learning outcomes. No updated syllabi or lesson plans were provided to demonstrate how concepts, readings, and assignments from these texts will be integrated into the corresponding courses in a systematic and effective manner. It is not clear in many cases whether the newly selected texts are in fact written as textbooks, with integrated lesson plans and student activities, or are reference books, with general information provided on the course topics. In each case, such texts would require integration into the course outlines differently, which cannot yet be evaluated. Ultimately, the systematic and effective implementation of the revised curricula, to include the listed texts, can only be demonstrated in practice over time; whereas the response informs that such revisions will not begin implementation until the Fall 2010 quarter. Therefore, the effective and appropriate use of instructional materials in compliance with this standard cannot be determined.

5. Standard IV-C: Performance Measurements

The institution did not demonstrate that it has a sound, written assessment system that contains a set of defined elements appropriately related to the performance objectives of the course or program.

The team reported that the institution did not utilize any standardized, nationally-normed instrument as an exit test for its Intensive English students in order to demonstrate and assess their total progress in language acquisition, which is an ACCET requirement. The team also noted that evaluations of students in many courses of the Music and Artist Development programs were largely subjective through instructor observation of student performances, whether instrumental or voice, without skills checklists or similar tools to help guide, standardize, and record assessments. These courses contained no guidelines to denote expectations of progress from the beginning of the course to the end of the course, and evaluations were not documented in such a manner as to allow determination of the level of progress a student has made. The institution responded by implementing a new policy requiring all exiting language students to take the *Top Notch Summit Full Course Placement*

Test B, and provided examples from the first two students who have taken this test. It explained that students take the corresponding Placement Test A at the beginning of the program, and that the tests are linked and will, therefore, provide a good gauge of student progress. While this sounds promising, its value in practice is unclear since the institution did not explain how the tests are “linked” nor provide any documentation to evidence the comparison and analysis of progress in the case of the two students exhibited. Therefore, while implementation of the test has been demonstrated, its use as a measure of progress in total language acquisition is still not in evidence. The response also included copies of skills checklists created to guide and quantify the assessment of student musical performances during the final examinations of multiple performance courses in the Music and Artist Development programs. However, no copies of completed checklists were provided to demonstrate systematic and effective implementation in practice, nor did the institution’s response address the team’s concerns regarding lack of written guidelines to denote the expected progress of a student in a performance-based course. Therefore, it remains unclear to what standard a performing student under examination in such a course is being held, whether to an impartially-set level of proficiency or to an assessed degree of personal advancement during the duration of the course and, in either case, where such standards are defined.

6. Standard IV-D: Curricular Review/Revision

The institution did not demonstrate that it uses written, systematic, and effective procedures, including completion and placement results, to continuously monitor and improve the curriculum.

The team noted the existence of a written policy directing curricular review, but reported that its implementation was informal, undocumented, and not demonstrably subject to proper review and control at the senior management level. While the institution described a process drawing from many sources of feedback from many relevant constituencies to influence curricular review decisions, no evidence of systematic and effective implementation of this process was available. In its response, the institution provided a revised policy tying the schedule of formal review to the quarterly calendar, as well as copies of instructor feedback from the Quarterly Instructor’s Meeting in June 2010. However, while this exhibit adequately demonstrated the timely collection of one source of feedback, it still did not speak to any higher level analysis and follow through using this or other feedback. The revised policy states that all changes will be subject to review by the Associate Director and Director. Yet no evidence was provided of such a review that would take faculty and other feedback – from students via quarterly instructor evaluations, from graduates and withdrawn students via exit interview forms, from employers via employer questionnaire and program overview forms, and from student services via completion and placement results, all of which are suggested by this standard, yet none of which are mentioned in the institution’s revised policy – and using these data to document a rationale why curricular revisions are or are not necessary at the moment and, as appropriate, document the nature of any resultant revisions. Therefore, the systematic and effective implementation of a formal process for adequate curricular review has not been demonstrated.

7. Standard V-A: Instructional Methods

The institution did not demonstrate that policies and procedures are in place to ensure consistency of application by all instructional staff using an instructional methodology consistent with contemporary training industry standards and appropriate to the educational goals and curricular objectives of the programs.

The team reported that, according to the eASER, the Music and Engineering & Music Production programs are to use a prescribed methodology, consisting of collaborative and problem-based learning techniques designed to be interactive and to simulate the professional world. However, the team found during observations and interviews that this is not consistently understood or adhered to in the classrooms, nor supported by instructional materials. In response, the institution stated that introductory materials formatted to a Comprehensive Musicianship through Popular Music (CMPM) methodology have been prepared, shared with all relevant faculty at the most recent school-wide staff meeting and in-service training session in June 2010, and added to the standard orientation process for each newly hired instructor. The CMPM teaching methodology is to be reviewed formally by all teachers every quarter during future in-service training sessions. More importantly, while the response included a sample lesson plan downloaded from the CMPM's authors, it did not provide any examples of how this methodology will be implemented by the institution's own faculty to create appropriate lesson plans for the institution's own course content, stating instead that these will be developed at future in-service training sessions. Therefore, systematic and effective implementation of the future orientation and training processes in conjunction with the prescribed instructional methodology has not been demonstrated, and can only be evaluated in practice over time.

8. Standard VI-C: Instructor Orientation and Training

The institution did not demonstrate that it has an effective policy for the continued professional development of instructional personnel that is systematically implemented, monitored, and documented.

The team cited the institution for the absence of evidence or documentation of any in-service training or professional growth activities on the part of faculty. The institution replied with documentation of attendance at the most recent Quarterly In-Service Training Session for all instructors, held on June 30, 2010, and provided only the attendance sheet indicating the topics of discussion. However, conducting one in service training session with faculty does not indicate that a policy of continued professional development has been systematically and effectively implemented.

9. Standard VIII-A: Student Progress

The institution did not demonstrate that quarter credits and clock hours are used appropriately to denote the successful completion of the education and training services provided, nor that it utilizes sound written policies and procedures that clearly describe the institution's requirements for satisfactory academic progress.

The team reported that the institution publishes two probationary policies: one in which a student is allowed only one quarter of probation during the scheduled length of a program, and one in which a student may continue on probation as long as he/she meets the terms of the probation, until such time as satisfactory academic progress status is regained. It also cited the inconsistent use of clock hours versus quarter credits in the institution's policies. The institution supplied a revised catalog with rewritten progress policies attempting to address these contradictions; however, the Commission was unable to conclude that a better understanding and implementation of appropriate progress policies has been demonstrated. The revised catalog still contains the same mutually contradictory statements regarding probationary policy, albeit in the same paragraph ("Academic Probation," page 11). Additionally, while the institution has clarified the use of clock hours versus quarter credits in some areas, they still appear confused in others. Specifically, the institution's revised Satisfactory Academic Progress (SAP) policy (page 11) now states that "Each student is required to make quantitative progress towards program completion... each student must attend at least 85% of the scheduled class hours in every class during each quarter." While this is an acceptable attendance policy, it does not instructively relate to ascertaining quantitative progress in a quarter credit program such as the institution's, which must be measured as a ratio of credits successfully earned out of total credits attempted. Similarly, under "Completion and Graduation Requirements" (page 12), the institution states that, "To graduate, students must complete all required program coursework and the minimum number of clock hours for their program with a cumulative GPA of 2.0 or higher." Therefore, consistent and compliant assessment and documentation of student progress has not been demonstrated and can only be evidenced in practice over time.

10. Standard VIII-E: Completion and Placement

The institution did not demonstrate that written policies and procedures are followed that provide an effective means to regularly assess, document, and validate the quality of the education and training services provided relative to completion and placement rates consistent with the benchmarks established by the Accrediting Commission.

The team reported that all graduates in 2009 and year-to-date 2010 have been international students who cannot legally work in the United States under their current visa status. Therefore, reported placements could not be verified, even though all graduates were listed as self-employed. Additionally, neither procedural provisions nor documentation reviewed on site demonstrated processes for documenting self-employment, continuing employment, temporary employment, or part-time employment as required in ACCET Document 28. In response, the institution addressed the need to report domestic and international students, the former for completion and placement purposes, the latter only for completion, on separate Documents 28.1. It also provided an updated placement policy and a comprehensive worksheet for documenting all stages and possible outcomes of the placement verification process. However, no evidence of a functioning placement process, specifically including updated Document 28.1s, completion and/or placement rates, and completed examples of verification worksheets, has been provided. Therefore, without demonstration of systematic and effective implementation in practice, the Commission finds no basis on which to determine compliance with this mission-critical standard nor to ultimately validate the value of the institution's vocational programs relative to documented vocational outcomes.

Since denial of initial accreditation is an adverse action by the Accrediting Commission, the institution may appeal the decision. The full procedures and guidelines for appealing the decision are outlined in Document 11 – Policies and Practices of the Accrediting Commission, which is available on our website at www.accet.org. If the institution wishes to appeal the decision, the Commission must receive written notification no later than fifteen (15) calendar days from receipt of this letter, in addition to a certified or cashier's check in the amount of \$5,000.00, payable to ACCET, for an appeals hearing.

In the case of an appeal, a written statement, plus six (6) additional copies, regarding the grounds for the appeal must be submitted in **PDF format on CD-ROMs** to the ACCET office within sixty (60) calendar days from receipt of this letter. The institution may provide clarification of and/or new information regarding conditions at the institution relating to the findings of non-compliance up to the time of the Commission's decision, but not thereafter. In the event of a final determination of denial of accreditation, the institution is precluded from making application for accreditation for a minimum of one (1) year from the date of such final action.

Initial applicants are advised that, in the instance of an appeal following a denial of accreditation being initialized in accordance with ACCET policy, the institution may not make substantive changes to its operations, such as additional programs or sites, until a notice of final action is forwarded by the Commission.

It remains our hope that the accreditation evaluation process has served to strengthen your institution's commitment to and development of administrative and academic policies, procedures, and practices that inspire a high quality of education and training for your students.

Sincerely,



ELECTRONIC SIGNATURE

Roger J. Williams
Executive Director

RJW/mln

cc: Ms. Joanne Wenzel, Staff Services Manager III, California Bureau for Private Postsecondary Education (joanne_wenzel@dca.ca.gov)
Mr. Louis Farrell, Director, SEVP, Department of Homeland Security (louis.farrell@dhs.gov)