



ACCREDITING COUNCIL FOR CONTINUING EDUCATION & TRAINING
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December 24, 2010

VIA FEDERAL EXPRESS & EMAIL
(es_law@hotmail.com)

Mr. Eungsen Law, President
Center of English Language
3434 Forest Lane
Dallas, TX 75234

*Re: Reaccreditation Denied/Accreditation Withdrawn
(Appealable, Not a Final Action)
ACCET ID #1062*

Dear Mr. Law:

This letter is to inform you that, at its December 2010 meeting, the Accrediting Commission of the Accrediting Council for Continuing Education & Training (ACCET) voted to deny reaccreditation to Center of English Language, located in Dallas, Texas.

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 October 11-12, 2010), and the institution's response to that report, dated November 24, 2010. It is noted, for the record, that the institution was also required to submit an interim report that was to include: 1) a precisely detailed student tracking policy and procedure to facilitate the collection, production, tracking, and analysis of data to accurately and consistently calculate completion rates based on the number of weeks/terms a student enrolls for and completes; and 2) completion rates for the period January 1, 2009 through December 31, 2009, as well as completion rates for January 1 through September 30, 2010. That report was directed by the Commission in its September 3, 2010 action letter and was received October 12, 2010, as a result of the Commission's review, at its August 2010 meeting, of successive interim reports dating back to findings originating from an on-site visit for the change of ownership/control of the institution reviewed at the December 2009 Commission meeting and continued at the April 2010 meeting. That meeting resulted in a Commission action letter, dated May 3, 2010, that placed the institution on show cause, requiring it to show cause why its accreditation should not be withdrawn, for failure to respond to the directive of the December 15, 2009 action letter relative to completion data. The show cause directive was continued at the August 2010 Commission meeting for a continued failure to provide the data requested relative to completion rates, policies and procedures. Consequently, taking into consideration the record in conjunction with the current team report and response, 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, written one-year and longer-range plans that include clearly defined operational strategies with timeframes, resources, and measurable results identified for subsequent evaluation. Specifically, the team report indicated that, while both short- and long-term goals were presented with objectives stated, including a date set for completion, neither short-term, nor long-term plans contained defined operational strategies for implementation. In addition, the plans lacked any notation of resources to be allocated for the attainment of the goal, and who would be responsible for the goals' achievement, as required. The institution did not address this finding in its response, confirming the lack of overall managerial capacity and oversight as noted above, and failed to demonstrate compliance with this standard.

2. Standard II-C: Personnel Management

The institution did not demonstrate that management provides supervision, evaluation, training and development of its employees to ensure that qualified and capable personnel, at appropriate staffing levels, are placed and effectively utilized. The team report indicated that there was no formal system for the review of employees. The Director had a supervisory role over faculty, but the Assistant Director and the Instructor Evaluator conducted most of the classroom observations, yet the Assistant Director had no background in ESL or teacher supervision. Observations had not been conducted with regularity. There was no written job description for the Instructor Evaluator, a newly created position, nor had that employee's hours been expanded to accommodate this new role, which indicated a lack of systematic and effective implementation.

The institution indicated in its response that two teachers have been appointed to be Instructor Evaluators, including the one who was in that role at the time of the on-site visit. It noted that both have university degrees and many years' experience as ESL instructors. The response further noted that it "has been formally decided to conduct teacher evaluations regularly every six months, starting in 2011." The response explained that the Assistant Director served as a teacher supervisor "on one occasion several years ago, and not since CEL came under new ownership." The response included a copy of the written job description for the new position of Instructor Evaluator, but did not include a schedule of review for the proposed 2011 observations of instructors or any indication that the two Instructor Evaluators would be scheduled appropriately to allow them the time to complete the duties entailed in their new roles. Finally, no documentation was provided for the Instructor Evaluators to demonstrate qualifications beyond their degrees and ESL instructor experience. Therefore, systematic and effective implementation and observable results were not in evidence in the institution's response, and the institution has failed to demonstrate compliance with this standard.

3. Standard II-D: Records

The institution did not demonstrate that it has an organized record-keeping system to ensure all records are maintained in an accurate, orderly, and up-to-date manner to facilitate convenient review of those records by appropriate parties. The team report indicated that files were sometimes disorganized and, thus, difficult to review in general. It stated that tracking of cumulative attendance was not done in paper or electronic form, and, in order to be able to determine if a student had missed more than the allowed number of days, a manual count of the attendance data had to be performed. Further, attendance and academic data were not tracked over time.

The institution indicated in its response that it “has already set up an electronic database” to record attendance and academic data, and noted that it will be implemented in January, 2011. The response also noted that the institution has “an extensive database with students’ transcripts,” and that these transcripts are made from the monthly grade sheets and are made “on demand, rather than automatically.” It stated that this system of creating transcripts was developed in response to a previous ACCET visit, “and met with ACCET’s approval.” However, the response did not discuss, either under this standard or below under Standard VIII-B, any system for the cumulative tracking of attendance, except to note the planned database that is scheduled to be implemented in January 2011. No information relative to this database was provided, such as plans, meeting minutes, or a technical description of the platform and the specific data elements to be tracked. In addition, the institution did not address the finding of overall disorganization. Thus, lacking any observable evidence of corrective actions taken, the Commission was unable to consider that the institution was in compliance with this standard.

4. Standard II-E: Communications

The institution did not demonstrate that it maintains operational effectiveness through periodic meetings with employees or that appropriate documentation is maintained on significant issues. The team report indicated that minutes were not provided for the 2010 yearly faculty meeting. The report also noted that a single yearly meeting for faculty is too infrequent for promoting effective communications.

The institution acknowledged the “shortcoming” in its response, noting that it plans to hold quarterly faculty meetings. However, no additional information relative to this issue was provided, such as meeting minutes from a meeting already convened or, lacking such a proactive response, an agenda for a planned meeting or a tentative schedule of the next four quarters. In addition, the institution did not address the citing relative to the undocumented 2010 faculty meeting. Without any credible explanation past non-compliance or definitive evidence of remediation, the institution has failed to demonstrate compliance with this standard.

5. Standard IV-B: Instructional Materials

The institution did not demonstrate that program materials, including syllabi, lesson plans, and texts are up-to-date, readily available, and facilitate positive learning outcomes. Further, it did not demonstrate that instructional materials, including supplementary textbooks, software, learning activities, visual aids, electronic links, and other teaching tools support the program goals and objectives. The team report noted that material was outdated and there were no materials, such as realia, photo libraries, activity books or DVDs available for teachers to use in the classroom. There was no copyright policy posted anywhere in the school; copies were made from books each session to meet the curricular needs of the classes. The team noted that, in levels 107 and 111, in reading and writing class, both teachers said that they and the students received photocopied chapters of *Improving Vocabulary Skills* chapters 1-4 (111) and *Groundwork for Better Vocabulary* chapters 7-9 (107) each session. One student in class 106 had a photocopied book, and in class 104 two students had photocopied books. In addition, the team report indicated that there was no EFL Program Coordinator, and it was up to the teachers to ensure that material was covered each session, and that students were adequately prepared for the level. Daily lesson plans were not required, and while weekly lesson plans were required, none of the teachers did the weekly lesson plans because there was no one to turn them into, as the institution had no academic coordinator.

The institution stated that, regarding photo libraries, activity books or DVDs as supplementary materials, "it takes a concentrated effort to get students through the materials already employed within the space of each four-week time frame." The response indicated that the grammar books for the beginner and advanced levels come with CDs, the reading books for both intermediate and advanced levels offer interactive internet access. The response stated that all levels have required texts, which are sold at the school. As for copyright violations, the institution's response indicated that it does not copy texts for students and that, "if individual students have taken it upon themselves to privately make copies of entire books at an external source, the school is powerless to act as photocopy police in those circumstances." The institution acknowledged that copyright policy notices should be posted "if for no other reason than to protect the school and provide warnings to students..." The Commission found the institution's response to be minimally responsive to the cited concerns. It dismissed the idea of utilizing supplementary materials in the classroom by stating merely that there is too much to do already just in the textbooks, without any thoughtful analysis as to the potential benefits of incorporating materials that address varied learning styles and teaching methods. The response also noted that some books have DVD's or come with internet access, but these are typically used outside of class for individual student use and not as a full class activity. Further, while the institution acknowledged that it "should" post a copyright policy, it did not state that it has done so, and it is the Commission's opinion that it has the right to expect that students do not use photocopied texts in class. In addition, it did not address the issue that teachers indicated they received photocopied chapters to use in class, an even more serious concern over which the institution has a clear responsibility.

The response further indicated that the institution has assigned an experienced teacher as the EFL Program Coordinator and that, starting in January 2011, teachers will be required to submit weekly lesson plans to her for the upcoming week. The response stated that the EFL Program Coordinator listed on the organizational chart, reviewed by the on-site team and referenced in the institution's eASER is needed "in dealing with architectural plans/design" for two new planned branch campuses, calling into question its operational priorities in the context of the serious findings identified to date. The institution did not provide any sample copies of completed weekly lesson plans to evidence the systematic and effective implementation of a basic instructional component required by the standard and so fundamental to the operation of an accredited educational institution.

The institution was found to be unresponsive to the varied issues cited under this standard. Specifically, the response lacked documentation to demonstrate observable results of corrective actions undertaken that would assuage the Commission's serious concerns relative to this standard and the institution as a whole. Instead, these concerns were dismissed with brief statements lacking any corroborating evidence, noting only that the institution planned changes that would be implemented in 2011, with little evidence of any systematic and effective implementation of mission critical policies, procedures, and practices.

6. Standard IV-C: Performance Measurements

The institution did not demonstrate that performance measurements are written and are periodically evaluated and updated to ensure instructional effectiveness. The institution lacked a sound, written assessment system containing a set of defined elements that are appropriately related to the performance objectives of the program or course. The team report indicated that the lack of grading rubrics, teachers' meetings, and the EFL Program Coordinator hindered consistency with grades and performance measurements among teachers. The institution did not use grading rubrics to assess writing and speaking and none of the instructors interviewed during the on-site visit had received instruction or guidelines on assessment in order to standardize the measurement of writing and speaking grades. In addition, the team found no evidence that a standardized exit test was being used to assess student achievement, except for students who complete level 112; however, if a student did not complete level 112, no exit test was given. Finally, exams and grades were filed by session and level, so it was impossible to review a student's progress over time without first locating all the session tests and grades, as they were not stored in the student file.

The institution again referenced the aforementioned new EFL Program Coordinator and noted that she is creating grading rubrics to be used starting in January, 2011, and that they will be explained in a staff meeting following Christmas vacation. It stated that, in reference to the unavailability of a hard copy of the Student Handbook, "it is readily accessible online, which complies with the requirements currently mandated by ACCET regarding the maintenance of electronic records and data rather than paper-based information." The response indicated, in reference to the Michigan Placement Test, that, "[i]f the team is referring to the English placement Test Answer Sheet, where students fill in blanks according to the answers they select from a multiple choice test, the response is as follows: There is no answer sheet with

“answers” on it. There is a clear plastic master with perforations corresponding to the places where correct answers have been marked. It is held over the student’s submitted page, in the student’s presence, and the correct answers are counted as they are revealed by the perforations. All that is required to review a student’s placement test is to hold the master over the answer sheet. It is kept, along with the University of Michigan’s evaluation scales, in a folder in the Assistant Director’s desk drawer.” The response also noted that, “[d]ue to time restraints,” the exit test is not given to students after level 112, but level 112 students are given a final exam, “which is a good indication of the student’s level and proficiency.” The response indicated that, relative to the filing of scores and grades by level and session, this is done because “[s]tudent files become very bulky if there are F-2 dependents’ papers, as well as the F-1 student’s document copies. Add to these a collection of monthly grade sheets and a file becomes a problem.” It further noted that “electronic records are created whenever a student requests a transcript, and a copy of the original printout is stored in the student’s file.”

In its review of the response relative to this standard, the Commission found it confused and unresponsive to the issues cited. The frequently referenced panacea of the EFL Program Coordinator was again noted, without providing any substantive evidence of systematic and effective implementation of corrective actions, such as a sample draft of a grading rubric that she has created. As for the reference to the hard-copy Student Handbook, this was not cited as a weakness, but was merely mentioned by the team. Similarly, the issue of the placement test answer sheet was only noted by the team and not cited as a finding, since, in both cases, they were only hindrances to the team’s review and not deemed to be weaknesses. However, the issue relative to exit testing was cited as a weakness and the institution’s response did not adequately address the lack of systematic and effective implementation of a standardized exit test, as required by ACCET standards for all full-time enrollees who complete eight weeks or more of study, no matter what level they complete. Finally, students who enroll for multiple sessions cannot be viewed as a series of individual enrollments; rather, they must be able to demonstrate progress over time. The need to be able to track their progress through grade sheets is essential to the accreditation process. On-demand transcripts do not compensate for this, as they are unusable as a tool to monitor a student consistently throughout the course of his/her study. The institution lacked an effective tracking system at the time of the on-site visit, and the response failed to provide evidence of systematic and effective implementation, with observable results, of a procedure to continually track students’ progress.

7. Standard IV-D: Curriculum Review and Revision

The institution did not demonstrate that it uses systematic and effective procedures to continuously monitor and improve the curriculum. The team report indicated that the institution had no written policy for the periodic review and revision of curriculum, and as no EFL Program Coordinator was present, there was no academic oversight of the curriculum review process.

The institution did not address this weakness in its response, thus failing to demonstrate systematic and effective implementation of policies and procedures relative to this standard.

8. Standard V-A: Instructional Methods

The institution did not demonstrate that its instructional methods encourage active and motivated responses from participants or that its instructional methodology is consistent with contemporary training industry standards or serves the individual learning needs and objectives of participants. The team report indicated that the institution's ASER stated that the overall instructional approach is communicative language teaching, and the teacher handbook contained an overview of communicative language teaching; however, the teachers observed by the team exhibited a very traditional teaching methodology. The team observed seven classes and all the classes focused on guided practice with no student language production. In addition, one teacher was observed, who was unable to explain the grammar of the lesson; students were correcting him and at one point, he asked the students if the grammar pattern looked correct. The students in the class were frustrated and confused.

The institution indicated in its response that "there are benefits to be gained from both using a traditional teaching approach as well as being on the leading edge, and there are disadvantages from always teaching the same way. Using students as guinea pigs and following the latest whims and fancies can be unsettling as well as expensive, if scrapping teaching programs and obtaining permission to introduce new materials and philosophies is to be considered." The Commission noted that using a mixture of methodologies is well-established as beneficial to students; however, the team report noted that, in all seven classes observed, the teaching was not interactive. Further, the institution's ASER claimed that instruction was communicative, but no communicative language teaching methodology was observed in any classroom visited by the team. It should be noted that communicative language methodology is not considered "the latest whim" and has been firmly established in the ESOL field for many years. As for the teacher referenced above, the institution indicated that he "is going through a very sad and trying family problem," without any indication that counseling or additional training in grammar has been sought or provided. The institution's response to the weakness was unsubstantive and defensive, as it provided merely a weak argument in favor of the status quo without any indication that the institution has taken this finding in the accreditation review process seriously or that it attempted to implement any type of analysis or improvement plan relative to instructional methodology.

9. Standard VI-B: Supervision of Instruction

The institution did not demonstrate that individuals with relevant education and experience in instructional delivery and management supervise instructional personnel, or that supervisors demonstrate good practice in the evaluation and direction of instructors, or that classroom observations, along with student and supervisory feedback, are effectively utilized. The team report indicated that there was very little supervision of instructors. While one of the long-term teachers had the title "Instructor Evaluator," there was no job description for her. Reviews of instructors were conducted in 2010, but not in 2008 or 2009.

The institution's response included a detailed description of the backgrounds of the Director and Assistant Director. It noted that reviews of instructors were not conducted in 2008

because of “a traumatic period while the Department of Homeland Security conducted a mysterious investigation” and the total student population was reduced to six students taught by the long-term instructor now designated as one of the Instructor Evaluators. The investigation ended in late 2008 and the institution was again permitted to enroll F-1 visa students. Since then, the school was purchased by a new owner, and the student population increased beginning then through 2009. The response indicated that, “[w]ith the new ownership, the school may have some teething problems,” and noted that it will continue to improve. However, the institution did not provide any evidence of even nascent improvements that would have mitigated the concerns relevant to this finding, which are further reinforced in the citation of a pattern of operational weaknesses noted in this letter. Lacking any detailed description of corrective actions undertaken, the Commission determined that the institution was not meeting the standard.

10. Standard VI-C: Instructor Orientation and Training

The institution did not demonstrate that it has developed and implemented a written policy for the effective orientation and training of instructional personnel or an effective policy for the continued professional development that is systematically implemented, documented, and monitored. The team report indicated that there was no supervisory element to new teacher orientation, and no documented formal support for new faculty hires. In addition, the report noted that there was no in-house professional development workshops scheduled for 2009 or 2010, and teachers interviewed by the team stated that no professional development had taken place.

The institution stated in its response that it plans to hold “In-house Development and Training” every six months. The response noted that the institution “has gone through major changes in the past two years and before now, it has not been possible, financially.” However, beyond this statement, no indication of even preliminary corrective measures was provided. Consequently, the systematic and effective implementation of policies relative to this standard has not been demonstrated.

11. Standard VIII-A: Student Progress

The institution did not demonstrate that it uses effective means to assess and record the progress of participants, that assessment results are documented consistently in accordance with institutionally established performance outcomes, or that student progress is assessed utilizing sound written policies and procedures that clearly describe the institution’s requirements for satisfactory academic progress. The team noted alarming inconsistencies in its report relative to the grading and placement process. The measurements were not standardized and instructors had no guidelines or rubrics available for grading. In some cases, even though students did not make 70%, the institution’s minimum passing grade, they were able to level up and in other cases, even if students made over 70%, they remained in the same class or went down a level. For example, the team asked a student why she went from level 112 to level 111 and she said it was because she did not want to take the TOEFL class and there were no other classes for her. Other examples were cited in the team report, as follows: 1) Lee Mikyeong, who went from

levels 101 through 107 appropriately, then went to 105 and 106 again, and then again repeated 105 and 106. She was in level 106 at the time of the on-site visit; 2) Ye Eunju went from level 101-104, then went to level 106, then down to 105, then repeated 106 twice, and then went to 101, with multiple leaves of absence; 3) Ju Chanwook enrolled in level 107 and went through to level 111, then dropped to level 107 again and went through to 112, and then went down to level 104.; 4) Kim Misuk started in level 103, went to 104, took a leave of absence, came back to level 101, then went to 103, and then took another leave and was on this leave at the time of the on-site visit. The team found that students were able to level up upon request with little academic oversight. For example, the team spoke with three students in class 107 who said that they had gone from level 105 to level 107 because they felt they did not need to take level 106.

The response indicated that the new ESL Program Coordinator is in the process of making uniformed grading rubrics that will be used starting January 2011, as noted previously above. It stated that students change levels for various reasons. Some go on vacation and forget previously learned material, therefore they retake a level when they return or go to a lower level. Some students have pending immigration status and while they are awaiting approval, they like to continue to study. In addition, the response noted that the institution is planning on adding more advanced levels to accommodate those students who reach level 112 or TOEFL and cannot progress further. The Commission did not accept this response, determining that the cases cited in the team report were egregious violations of the spirit and letter of the standard for which the institution offered minimal explanation. That explanation itself calls into question the oversight of the institution and its credibility as an educational organization. ACCET expects students to study ESOL in a steadily progressive manner from more basic levels to more advanced levels. While it is accepted that a student returning from an LOA might need to repeat a level, the cases cited reflect greater changes than simply one level down. Further, as previously noted in this letter, the ESL Program Coordinator's work has not been demonstrated at any level of detail, and the corrective actions she may be undertaking have produced no observable results to evidence the systematic and effective implementation of appropriate policies and procedures relative to student progress.

12. Standard VIII-B: Attendance

The institution did not demonstrate that written policies and procedures are established and followed to ensure that student participation and preparation are consistent with the expected performance outcomes of the course or program.

The team report indicated that attendance was not being tracked, that teachers were not clear on the attendance policy, and there was no documentation of tardy students. Further, there was no system to track cumulative attendance. The report noted that, in each class observed by the team, students walked in 30 – 60 minutes late, and teachers did not reprimand the students. Teachers informed the team that they were unclear on when to mark students tardy or absent. The report also noted that one student who received 40% attendance was allowed to take the end of session exam, contrary to the institution's policy of no less than 70% to be eligible to take the exam. The evening program had 0% on time arrival for a class of 21 students.

The institution indicated in its response that the attendance records and progress reports are given to the Teacher's Assistant at the end of each session and are filed in cabinets rather than in students' files because "the paperwork that this represents is inconvenient." The response noted that the Director is updated on a weekly basis by teachers regarding students' attendance, "and when indicated, an asterisk is placed against the student's name in the Student Log. This is the only record for students who have attendance issues, and they are sent warning letters, "but this is an issue than will be rectified the very next time a warning letter is created, simply by entering the student's name and address into the computer." The response also noted that students arrive tardy because of traffic issues or other personal reasons. The institution stated in its response that, "Our students are paying to come here and we do not punish that which can't be helped. We prefer for them to make up the material missed."

The Commission noted that the institution failed to address the case of the student who was allowed to take the level final exam, even with a 40% attendance. As for the tardy issue, ACCET is not requiring that the institution prohibit students from being tardy, and understands that students will come late for a variety of reasons, but it requires that the institution track these late arrivals (and early departures) in its attendance records, and the failure to do so is a factor in the institution's non-compliance with this standard. The institution did not address the need for a cumulative tracking of attendance over sessions for students within their session as well as across sessions for long-term students. The institution's statement that the situation will be rectified with the next warning letter "simply by entering the student's name and address into the computer" is vague and provides no detail as to a systematic and effective policy and procedure for tracking and enforcing an attendance policy as required by the ACCET standard, which the institution has failed to meet.

13. 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 rates, and that the number of participants who complete the programs and courses in which they enroll is consistent with the benchmarks established by the Accrediting Commission. The team report noted that the institution's ASER noted the questions under this standard were not applicable to it. However, two charts, one for 2009 and one for January through September 2010, were provided to the team in the team's workroom during the on-site visit. These charts listed all enrolled students with their start dates, weeks enrolled, and either a "complete date", "transfer date", "drop date", or "terminate date". No completion percentage was provided with this raw data, and the President removed the lists from the team workroom shortly after the entrance interview in order to calculate the rates, which were not completed by the exit briefing on the second day, but were provided via email three days after the on-site visit. It is noted that the data provided was a tally of the columns in the two aforementioned charts and did not indicate a percentage. Further, while the numbers in the columns for the 2009 data added up to the total enrolled

students for that year, the numbers for the 2010 data did not, making it impossible to calculate a completion rate for 2010.

The institution indicated in its response that it recalculated the 2010 data and provided this information in its response. In addition, the interim report referenced herein contained a similar chart as that provided to the team, without any calculated percentage and lacking the required policies and procedures, which were also not present in the response to the team report. Combined with this lack of crucial data, for which the institution has been on show cause status since the April 2010 Commission meeting, the institution has failed to demonstrate that it has policies and procedures relative to this standard to ensure systematic and effective tracking and monitoring of completion data.

Since denial of reaccreditation 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. This notification must be accompanied by an affidavit signed by an authorized representative of the institution indicating that a Notice of Status of Accreditation notifying interested parties of the Commission's adverse action has been disseminated to new enrollees and posted in conspicuous places at the institution to include, at minimum, the admissions office and student lounge or comparable location. In addition, the institution must submit a written teach-out plan that is in accordance with ACCET Document 32 – Closing/Teach-Out Policy.

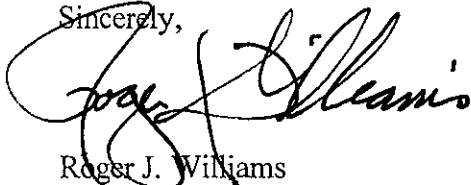
In the case of an appeal, a written statement, plus six (6) additional copies regarding the grounds for the appeal, saved as **PDF documents and copied to CD-ROMs**, must be submitted to the ACCET office within sixty (60) calendar days from receipt of this letter. The appeal process allows for the institution to provide clarification of and/or new information regarding the conditions at the institution at the time the Accrediting Commission made its decision to deny or withdraw accreditation. The appeal process does not allow for consideration of changes that have been made by or at the institution after the Commission's action to deny or withdraw accreditation, except under such circumstances when the Commission's adverse action included a finding of non-compliance with Standard III – A, Stability, whereupon the Appeals Panel may consider, on a one-time basis only, such financial information provided the following conditions are met:

- The financial information was unavailable to the institution until after the Commission's decision was made and is included in the written statement of the grounds for appeal submitted in accordance with the ACCET appeals process;
- The financial information provided is significant and bears materially on the specified financial deficiencies identified by the Commission; and

- The Appeals Panel shall apply such criteria of significance and materiality as established by the Commission. Further, any determination made by the Appeals Panel relative to this new financial information does not constitute a basis for further appeal.

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,

A handwritten signature in black ink, appearing to read "Roger J. Williams". The signature is fluid and cursive, with a large initial "R" and "W".

Roger J. Williams
Executive Director

RJW/sef

c: Ms. Diane Currie, School Certification Branch, Chief, DHS (diane.currie1@dhs.gov)