



ACCREDITING COUNCIL FOR CONTINUING EDUCATION & TRAINING
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August 29, 2012

VIA EMAIL
(corvind@ieccolleges.com)

Mr. Don Corvin
Vice President of Compliance
IEC International Corporation
United Education Institute
6055 Pacific Boulevard
Huntington Park, CA 90255

***Re: Reaccreditation Deferred;
Interim Report Reviewed;
Institutional Show Cause Continued;
Follow-Up Visits Required (Corporate/ San Bernardino);
Reinstate Program Approval – 4 programs;
Additional Program Approvals Withdrawn – 28 programs;
Limited Enrollments – 33 programs;
Complaint closed with full merit;
Interim Report Required;
ACCET ID #0289***

Dear Mr. Corvin:

At its August 2012 meeting, the Accrediting Commission of the Accrediting Council for Continuing Education & Training (ACCET) reviewed the interim report submitted by United Education Institute, with its main campus in Huntington Park, California, and branch campuses in Anaheim, El Monte, San Diego, Chula Vista, Van Nuys, San Bernardino, and Ontario, California, in response to the May 4, 2012, Commission Action letter resulting from an Institutional Show Cause Directive initialized at the April 2011 Commission Meeting and continued at the August, and December 2011, and April 2012 Commission Meetings. That letter deferred final consideration of the reaccreditation on-site visit team reports (visits conducted January 4-7, 18-21 and February 17-18, 22-25, 2011), and the institution's responses to those reports, dated over the period February 24 through March 24, 2011, continued the Institutional Show Cause, and directed the institution to provide: 1) A comprehensive narrative update on the continuing implementation of the institution's initiatives for enhancing career services assistance for all graduates and ensuring vigilant corporate oversight of resultant completion and placement documentation and statistics. 2) Updated completion and placement data for all programs at all campuses for calendar year 2011 and for the period January 1 – March 31, 2012, performed by UEI's Corporate Verification Department employing the same auditing methodology as used by Weworski & Associates for the placement audit previously conducted as directed by the Commission. The scope of this placement audit was to include the preparation and submission of: a) updated Documents 28.1 – Completion and Placement Statistics for all programs to include all students scheduled to graduate; b) full supporting documentation substantiating each reported start, completion, waiver, and placement in accordance with verification requirements disclosed in ACCET Document 28 – Completion and Placement Policy for the various categories of training-related employment, and c) a corresponding list for each Document 28.1 submitted by the institution identifying by monthly cohort, the name of each student included on the form,

along with the student’s cumulative grade point average, and overall attendance rate utilizing the attached On-site Sampling Verification: Completion, Placements, and Academic Data form as a guide for each scheduled-to-graduate (Column #3) cohort on the respective 28.1s to be submitted. Further, the institution was to provide a complete list of all students, by program and campus, enrolled after May 4th, 2012 in those programs for which approval had not been removed, to include a narrative update on their progress toward completion of their respective program; 3) A table or spreadsheet tallying the total number of new enrollments executed in each program at each campus since receipt of the May 4, 2012 letter.

Upon review of the interim report, received July 21, 2012 (with additional updates emailed on July 26, 2012), the Commission determined that, while some degree of progress was evident in select programs across all eight campuses, the placement statistics for the near majority of programs are still well below the ACCET placement benchmark. Following extended deliberation and debate on the pros and cons of continuing deferral of accreditation, the Commission found sufficient good cause to defer consideration for one additional review cycle and extend the institution’s accredited status pending further review at its December 2012 meeting and continued the Institutional Show Cause status due to seriously below-benchmark placement rates.

The institution’s interim report included a narrative response describing the institution’s change in vision now focused on “smaller campuses, fewer program offerings with more balanced enrollments, and discontinuation of programs where substantial progress has not been demonstrated.” The institution’s narrative further illustrated the continuing placement strategies implemented to improve the institution’s seriously below-benchmark placement rates. The Commission noted that four programs with the exception of the Vocational Nursing program in Chula Vista whose approval had previously been removed to cease further enrollment, are now in reporting range for both calendar 2011 and first quarter 2012*. Consequently the Commission voted to reinstate approval of those four programs noted below:

| <i>Campus/Program</i> | <i>Placement Statistics January – December, 2011</i> | <i>Placement Statistics January 1-March 31, 2012</i> |
|---|--|--|
| Ontario Criminal Justice | 70.83% (24 eligible/17 placed) | 72.73% (11 eligible/8 placed) |
| El Monte Medical Billing & Ins. Coding | 61.54% (26 eligible/ 16 placed) | 65.38% (26 eligible/17 placed) |
| El Monte Pharmacy Technician | 48.51% (101 eligible/49 placed) | 65% (20 eligible/13 placed) |
| Chula Vista Vocational Nursing | No graduates in 2011 | 15.63% (32 eligible/5 placed) *consideration of California licensing delays |

The Commission further noted, however, that 28 programs across the eight campuses still fail to rise above the show cause range. Therefore, the Commission voted to withdraw those program approvals, requiring the institution to teach-out the following programs, all of which have demonstrated a consistent pattern of below-benchmark placement rates for calendar year 2011 and first quarter 2012:

Program Approval Withdrawal

| <i>Campus/Program</i> | <i>Placement Statistics January – December, 2011</i> | <i>Placement Statistics January 1-March 31, 2012</i> |
|--|--|--|
| Anaheim Medical Assisting | 38.38% (396 eligible/152 placed) | 35.90% (78 eligible/28 placed) |
| Anaheim Pharmacy Technician | 56.73% (104 eligible/59 placed) | 42.86% (14eligible/6 placed) |
| Chula Vista Dental Assistant | 50.32% (157 eligible/79 placed) | 50% (34 eligible/17 placed) |
| Chula Vista Medical Assistant | 23.11% (515 eligible/119 placed) | 26.74% (86 eligible/23 placed) |
| Chula Vista Medical Billing & Ins. Coding | 54.55% (143 eligible/78 placed) | 34.38% (32 eligible/11 placed) |
| El Monte AAS Business Administration | 20% (5 eligible/1 placed) | 0% = (2 eligible/0 placed) *2 waivers |
| El Monte Medical Assistant | 35.80% (352 eligible/126 placed) | 24.56% (57 eligible/14 placed) |
| Huntington Park Computer Systems Technician | 63.21% (106 eligible/67 placed) | 57.89% (19 eligible/11 placed) |
| Huntington Park Medical Assistant | 33.87% (815 eligible/276 placed) | 25% (144 eligible/36 placed) |
| Huntington Park Medical Billing & Ins. Coding | 38.77% (227 eligible/88 placed) | 46.67% (45 eligible/21 placed) |
| Huntington Park Pharmacy Technician | 41.27% (126 eligible/52 placed) | 40.74% (27 eligible /11 placed) |
| Ontario AAS Business Administration | 0% (2 eligible/0 placed) | 25% (4 eligible/1 placed) |
| Ontario Dental Assistant | 49.64% (137 eligible/68 placed) | 46.88% (32 eligible /15placed) |
| Ontario Medical Assistant | 24.41% (463 eligible/113 placed) | 21.88% (64 eligible/14 placed) |
| Ontario Medical Billing & Ins. Coding | 28.10% (153 eligible/43 placed) | 31.71% (41 eligible/13 placed) |
| Ontario Pharmacy Technician | 33.33% (120 eligible/40 placed) | 41.18% (17 eligible/7 placed) |
| San Bernardino AAS Business Administration | 50% (2 eligible/1placed) | No 28.1 statistics provided |
| San Bernardino Dental Assistant | 42.27% (97 eligible/41 placed) | 34.29% (35 eligible/12 placed) |
| San Bernardino Medical Assistant | 25.43% (409eligible/104 placed) | 16.44% (73 eligible/12 placed) |
| San Bernardino Medical Billing & Ins. Coding | 32.46% (114 eligible/37 placed) | 39.29% (28 eligible/11 placed) |
| San Bernardino Pharmacy Technician | 18.44% (141eligible/26 placed) | 12.5% (24 eligible/3 placed) |

| <i>Campus/Program</i> | <i>Placement Statistics January – December, 2011</i> | <i>Placement Statistics January 1-March 31, 2012</i> |
|--|--|--|
| San Diego Computer Systems Tech. | 36.36% (11 eligible/4 placed) | 54.55% (11 eligible/6 placed) |
| San Diego Dental Assistant | 51.95 (154 eligible/80 placed) | 55.17% (29 eligible/16 placed) |
| San Diego Medical Assistant | 25.41% (366 eligible/93 placed) | 33.85% (65 eligible/22 placed) |
| San Diego Medical Billing & Ins. Coding | 42.40% (125eligible/53 placed) | 29.41% (17 eligible/5 placed) |
| San Diego Pharmacy Technician | 36.84% (190 eligible/70 placed) | 48.39% (31 eligible/15 placed) |
| | | |
| Van Nuys Medical Assistant | 41.62% (370 eligible/154 placed) | 33.33% (102 eligible/34 placed) |
| Van Nuys Criminal Justice | 69.14% (81 eligible/56 placed) | 50% (14 eligible/7 placed) |

Accordingly, the institution is prohibited from enrolling new students in all programs for which ACCET approval has been withdrawn, except those students with a signed enrollment agreement executed prior to the date of this Commission Action letter.

Additionally, the Commission voted to limit the number of enrollments allowed in the remaining 33 programs – which are currently performing in the reporting range or above, based on reported placement rates for calendar year 2011 and first quarter 2012 – not to exceed the following limits per campus for the remainder of 2012 until the Commission can evaluate the institution’s progress towards compliance at its December 2012 meeting. Accordingly, new student enrollments in those programs as noted below as still approved, cannot exceed the thresholds previously established in the May 4, 2012 Commission Action letter through the remainder of calendar year 2012 as follows:

Anaheim – 200 total new enrollments for period May 4 – December 31, 2012

- Business Office Administration
- Criminal Justice
- Computer Systems Technician
- Dental Assisting
- Medical Billing & Insurance Coding

Chula Vista – 250 total new enrollments for period May 4 – December 31, 2012

- AAS Business Administration
- Computer Systems Technician
- Criminal Justice
- Vocational Nursing

El Monte – 150 total new enrollments for period May 4 – December 31, 2012

- Business Office Administration
- Criminal Justice
- Computer Systems Technician
- Dental Assisting

Huntington Park – 300 total new enrollments for period May 4 – December 31, 2012

- AAS Business Administration
- Business Office Administration
- Criminal Justice
- Dental Assisting

Ontario – 75 total new enrollments for period May 4 – December 31, 2012

- Business Office Administration
- Computer Systems Technician
- Criminal Justice

San Bernardino – 100 total new enrollments for period May 4 – December 31, 2012

- Business Office Administration
- Criminal Justice
- Computer Systems Technician

San Diego – 50 total new enrollments for period May 4 – December 31, 2012

- AAS Business Administration
- Business Office Administration
- Criminal Justice

Van Nuys – 300 total new enrollments for period May 4 – December 31, 2012

- AAS Business Administration
- Business Office Administration
- Computer Systems Technician
- Dental Assisting
- Medical Billing & Insurance Coding
- Pharmacy Technician

The Commission further reviewed complaint #1223 and #1233 lodged against the San Bernardino, California campus, and voted to close this complaint, noting it to be with full merit. This complaint further evidences the continued weakness of administrative oversight exercised by the institution, particularly as it relates to job placement. The complaint review analysis confirmed that some reported placements from the San Bernardino Medical Billing and Insurance Coding program (for which program approval has been withdrawn) were inaccurately based on students who were improperly advised to sign documents attesting that they were self-employed, when in actuality, they did not meet the requirements of self-employment as defined in ACCET Document 28 – Completion and Placement Policy. While the institution's response to this complaint indicates that appropriate measures have been taken to ensure that all placements are valid, the over-arching issue of accurate placement verification is of serious concern to the Commission.

Consequently, the Commission has directed that two one-day, two-person, follow-up visits to both the corporate office in Irvine, California, and the San Bernardino branch campus take place in the December 2012 Commission review cycle. These visits will focus largely on the placement verification process, including the administrative oversight and validation process in order to provide additional analysis for the Commission's final decision regarding the institution's accredited status at the December 2012 Commission meeting.

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

1. A narrative update on the staffing of the San Bernardino placement department and its oversight to ensure confidence that the issues noted in the reviewed complaint have been systematically and effectively resolved.
2. A comprehensive narrative update on the continuing implementation of the institution's initiatives for enhancing career services assistance for all graduates and ensuring vigilant corporate oversight of resultant completion and placement documentation and statistics.
3. Updated completion and placement data for all programs at all campuses for calendar year 2011 and for the period January 1 – June 30, 2012, performed by UEI's Corporate Verification Department employing the same auditing methodology as used by Weworski & Associates for the placement audit previously conducted **to include all supporting Employment Verification Forms (EVL)s and applicable student signed attestations.** The scope of this placement audit must include the preparation and submission of 1) updated Documents 28.1 – Completion and Placement Statistics for all programs to include all students scheduled to graduate; 2) full supporting documentation substantiating each reported start, completion, waiver, and placement in accordance with verification requirements disclosed in ACCET Document 28 – Completion and Placement Policy for the various categories of training-related employment, and 3) a corresponding list for each Document 28.1 submitted by the institution identifying by monthly cohort, the name of each student included on the form, along with the student's cumulative grade point average, and overall attendance rate utilizing the attached On-site Sampling Verification: Completion, Placements, and Academic Data form as a guide for each Scheduled-to-Graduate (Column #3) cohort on the respective 28.1s to be submitted with the response.
4. Further, the institution must provide a complete list, by program and campus, of all students enrolled after the May 4, 2012 Commission Action letter in those programs for which approval has not been removed to include a narrative analysis on the progress made toward completion of their respective program.
5. A table or spreadsheet tallying the total number of current students enrolled in each program at each campus.
6. A complete teach-out plan, in accordance with ACCET Document 32 – Teach-out/Closure Policy for each of the 28 programs for which ACCET approval has been withdrawn.
7. A narrative on the institution's plan for maintaining sustainability and financial stability supported by internally generated financial statements for the period January 2012-October 2012 with an attestation by the COO or CFO that they are true and correct.

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.

Neither deferral of reaccreditation nor withdrawal of program approval are adverse actions and they are explained in ACCET Document 11 – Policies and Practices of the Accrediting Commission, which is available on our website at www.accet.org. In accordance with Commission policy, no substantive changes including, but not limited to, new programs or major program revisions, new branch campuses or other new sites, and/or relocation out of the general market area, will be permitted during the term of the deferral period.

Your demonstrated capabilities and commitment in support of the institution's accredited status are essential to a favorable outcome in this process. 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/lao

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

cc: Ms. Kay Gilcher, Chief, Accreditation Division, USDE (aslrecordsmanager@ed.gov)
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