

**Case Name:** *In the Matter of* Accrediting Council for Independent Colleges and Schools

**Docket No.:** 16-44-O

**Filing Party:** Respondent, Accrediting Council for Independent Colleges and Schools

**Exhibit No.:** B-O-100



## ACICS Standards of Ethical Responsibility for ACICS Review Board of Appeals Members

v. November 2017

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Each panel member of the ACICS Review Board must read and comply with the following Standards of Ethical Responsibility in performing their ACICS duties:

1. He/she shall uphold the accreditation process.
2. He/she shall avoid impropriety or the appearance of impropriety in all activities.
3. He/she shall perform the duties of the office impartially and diligently.
4. He/she shall refrain from any business activity inappropriate to accreditation responsibilities.
5. He/she shall disclose to the President any actual or potential conflict of interest and shall refrain from participating in review panel actions regarding an institution that is the subject of that conflict.
6. He/she shall preserve the confidentiality of the Review Board deliberations, institutional information and ACICS business information.
7. He/she shall not advocate for or against a policy which may impact an institution that is the subject of an appeal to the Review Board.
8. He/she shall not violate the *ACICS Policy on Discrimination and Harassment* in interactions with other review panel members, staff, or any person associated with a member institution.
9. He/she shall not solicit or accept, either for themselves or a family member, anything of value from an ACICS-accredited institution or an applicant institution seeking ACICS accreditation.

A member of the Review Board shall immediately inform the President of any potential violation of these Standards. The President will either determine that no violation has occurred or will notify the member of the Review Board involved of the allegation. The Review Board member involved shall have the opportunity to respond to the allegation in person or in writing to the



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v. November 2017

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President who shall make a determination. If the President determines that a violation has occurred, the Review Board member may be removed. In all other instances where a violation is found, the President shall take such action as necessary in order to maintain the integrity of ACICS.

I have read the **Standards of Ethical Responsibility for ACICS Review Board of Appeals Members** as stated above and agree to meet or exceed these Standards in performing my duties as a panel member of the Review Board.

(b)(6)

\_\_\_\_\_  
(Signature)

14 Nov. 2017  
\_\_\_\_\_  
(Date)

DAVID TENEYUCA  
\_\_\_\_\_  
(Please Print Name)



## Review Board of Appeals Members Classification and Attestation Forms

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Decision-making bodies must identify themselves as being classified as either member or public and if a member representative, either academic or administrative. Please read the definitions and attest to your classifications. A resume and/or CV will be required to evidence the selected classification(s).

### Classifications:

A **member** representative is defined as some who is:

- a) an **employee**, member of the governing board, owner, or shareholder of, or consultant to, an institution accredited by ACICS or has applied for accreditation; or
- b) a **member** of any trade association or membership organization related to, affiliated with, or associated with ACICS; or
- c) a spouse, parent, child, or sibling of an individual identified in paragraph a) or b) of this definition.

A **public** representative is defined as someone who is **not**

- a) employed by an institution or program that is either accredited by ACICS or has applied for accreditation by ACICS; or
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An **academic** representative is defined as someone currently or recently directly engaged in a significant manner in postsecondary teaching and/or research.

An **administrative** representative is defined as someone currently or recently directly engaged in a significant manner in postsecondary institutional or program administration.



**Attestations:**

Based on my qualifications and the definitions provided, I can be classified as a/an: \_\_\_\_\_

- Member representative.
- Public representative.
- Academic representative.
- Administrative representative.

I have read each of the definitions associated with classifying my role as a panel member of the Review Board and attest that my qualifications support my selections.

DAVID TENEYUCA

(Please print your full name): \_\_\_\_\_

(b)(6) \_\_\_\_\_  
(Signature)

14 Nov. 2017  
(Date)



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Dolores Capraro Goffre

(Please print your full name):

(b)(6)

(Signature)

(Date)

11/14/17



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v. November 2017

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v. November 2017

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I have read the **Standards of Ethical Responsibility for ACICS Review Board of Appeals Members** as stated above and agree to meet or exceed these Standards in performing my duties as a panel member of the Review Board.

(b)(6)

(Signature)

11/14/17  
(Date)

Dolores Capraro Goffre  
(Please Print Name)



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v. November 2017

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(b)(6)

(b)(6) *signature*

11/14/17  
(Date)

William Winger  
(Please Print Name)



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(b)(6)

11/14/17



**Attestations:**

Based on my qualifications and the definitions provided, I can be classified as a/an: \_\_\_\_\_

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I have read each of the definitions associated with classifying my role as a panel member of the Review Board and attest that my qualifications support my selections.

William Winger  
(Please print your full name)

(b)(6)

11/14/17  
(Date)

**Case Name:** *In the Matter of* Accrediting Council for Independent Colleges and Schools

**Docket No.:** 16-44-O

**Filing Party:** Respondent, Accrediting Council for Independent Colleges and Schools

**Exhibit No.:** B-O-101

## Michelle Edwards

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**From:** Karly Zeigler  
**Sent:** Monday, April 09, 2018 12:08 PM  
**To:** Michelle Edwards  
**Cc:** Perliter Walters-Gilliam  
**Subject:** RE: Schiller International University, Largo Florida

Done!

Judee has already started the review and will finish it up.

Regards,

Karly Zeigler  
Manager, Institutional Compliance  
Accrediting Council for Independent Colleges and Schools  
750 First Street, NE | Suite 980 | Washington, DC 20002  
[www.acics.org](http://www.acics.org) 202.336.6846 - p | 202.842.2593 - f  
Follow us on Twitter - <http://twitter.com/acicsaccredits>  
Like us on Facebook - <http://facebook.com/acicsaccredits>

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This communication is only intended for the persons or entities to which it is addressed or copied and may contain information that is confidential and/or privileged in some way. Distribution or copying of this communication or the information contained herein is not expressly authorized. ACICS reserves the right to disclose this communication as required by law without the consent of the persons or entities to which this communication is addressed.

-----Original Message-----

**From:** Michelle Edwards  
**Sent:** Monday, April 09, 2018 12:07 PM  
**To:** Karly Zeigler <[kzeigler@acics.org](mailto:kzeigler@acics.org)>  
**Cc:** Perliter Walters-Gilliam <[PWGilliam@acics.org](mailto:PWGilliam@acics.org)>  
**Subject:** FW: Schiller International University, Largo Florida

Karly,

Please see the email below regarding a conflict of interest in the file review assignments this week. Please work with Commissioner Fateri to ensure the file for Schiller is reassigned to another commissioner for review.

Thank you,  
Michelle

Michelle Edwards  
President and CEO  
Accrediting Council for Independent Colleges and Schools  
750 First Street, NE | Suite 980 | Washington, DC 20002 [www.acics.org](http://www.acics.org) 202.336.6780 – p | 202.842.2593 – f

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-----Original Message-----

From: Fateri, Fardad [IEC-IO] [<mailto:>] ]  
Sent: Monday, April 09, 2018 11:54 AM  
To: Michelle Edwards  
Subject: Schiller International University, Largo Florida

Michelle,

I noticed I was assigned Schiller's file as one of the schools to review during this week.

I want for this file to be re-assigned to another Commissioner as I do have a conflict of interest which would influence the process.

Thanks,

Fardad

Fardad Fateri, Ph.D.  
President and Chief Executive Officer  
International Education Corporation  
16485 Laguna Canyon Rd. Ste. 300  
Irvine, CA 92618

**Case Name:** *In the Matter of* Accrediting Council for Independent Colleges and Schools

**Docket No.:** 16-44-O

**Filing Party:** Respondent, Accrediting Council for Independent Colleges and Schools

**Exhibit No.:** B-O-102

## Michelle Edwards

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**From:** Katie Morrison  
**Sent:** Friday, September 29, 2017 4:31 PM  
**To:** Francis Giglio  
**Cc:** Perliter Walters-Gilliam; Michelle Edwards  
**Subject:** RE: Invitation - ACICS Review Board Panel - November 2017

Hi Fran,

Thank you for your response. As much we don't want to admit it, for our convenience, you bring up a good point with Branford Hall and we appreciate you doing so. Think we will ask around with some of our other administrative/member Review Board people.

Have a great weekend!

Kind regards,

**Katie Morrison**

Senior Coordinator, Accreditation Compliance

**Accrediting Council for Independent Colleges and Schools**

750 First Street, NE | Suite 980 | Washington, DC 20002

[www.acics.org](http://www.acics.org) | 202.336.6783 - p | 202.842.2593 - f

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**From:** Francis Giglio [<mailto:>] ]  
**Sent:** Friday, September 29, 2017 4:09 PM  
**To:** Katie Morrison  
**Cc:** Perliter Walters-Gilliam; Michelle Edwards  
**Subject:** RE: Invitation - ACICS Review Board Panel - November 2017

Hi Katie:

Thanks for reaching out to me. I think there would be some concern with a conflict of interest with Branford Hall Career Institute in Branford. Our company has some Lincoln Tech campuses (ACCSC accredited) in Connecticut that would be direct competitors with Branford so that would be conflict.

Also, I have to admit I've never heard of Northwest Suburban College, but saw its in IL and about 20 miles away from our location in Melrose Park, IL. We probably aren't competitors being so far away, but I would think the school would have an issue with me being on a panel.

If you seem to think that I would be okay, let me know, but that week right now does look open for me to come to DC.

Fran

---

**From:** Katie Morrison [<mailto:kmorrison@acics.org>]  
**Sent:** Thursday, September 28, 2017 9:36 PM  
**To:** Francis Giglio <>  
**Cc:** Perliter Walters-Gilliam <[PWGilliam@acics.org](mailto:PWGilliam@acics.org)>; Michelle Edwards <[medwards@acics.org](mailto:medwards@acics.org)>  
**Subject:** Invitation - ACICS Review Board Panel - November 2017

Good evening, Fran,

I hope you're having a great week.

We would like to invite you to serve on an ACICS Review Board of Appeals panel to hear the case of two withdrawals of accreditation by suspension – Branford Hall Career Institute (Branford campus) and Northwest Suburban College – on one day during the week of Monday, November 13 – Friday, November 17, 2017.

Having several new members on the Review Board of Appeals, we would certainly appreciate having you as a more seasoned member of the panel. Please let me know as soon as possible your availability for that week if you are willing and able to join the panel.

Thank you,

**Katie Morrison**  
Senior Coordinator, Accreditation Compliance  
**Accrediting Council for Independent Colleges and Schools**  
750 First Street, NE | Suite 980 | Washington, DC 20002  
[www.acics.org](http://www.acics.org) | 202.336.6783 - p | 202.842.2593 - f

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**This transmission may contain information that is privileged, confidential, and/or exempt from disclosure under applicable law. If you are not the intended recipient, you are hereby notified that any disclosure, copying, distribution, or use of the information contained herein (including any reliance thereon) is STRICTLY PROHIBITED. If you received this transmission in error, please immediately contact the sender and destroy the material in its entirety, whether in electronic or hard copy format. Thank you.**

**Case Name:** *In the Matter of* Accrediting Council for Independent Colleges and Schools

**Docket No.:** 16-44-O

**Filing Party:** Respondent, Accrediting Council for Independent Colleges and Schools

**Exhibit No.:** B-O-103



ACCREDITING COUNCIL FOR INDEPENDENT COLLEGES AND SCHOOLS  
**Canons of Ethical Behavior**

Revised: September 2016

*Members of onsite evaluation teams play a vital role in the application of ACICS policies, procedures, and standards focused on the evaluation and measurement of institutional performance consistent with the high level of integrity demanded of accreditation. Accordingly, the fulfillment of this role requires a clear and compelling understanding by evaluators of their function in the accreditation process.*

*In fulfilling accreditation responsibilities, an evaluator encounters a variety of issues and situations that require the exercise of fair and impartial judgment. Although the specifics of these issues and situations cannot be readily foreseen, the framework of such ethical principles represented in these Canons of Ethical Behavior is set forth:*

As a volunteer evaluator for the Accrediting Council for Independent Colleges and Schools,

1. I will conscientiously uphold the integrity of the accreditation process.
2. I will avoid impropriety and the appearance of impropriety while conducting all activities, including the accepting or offering of any gifts of material value.
3. I will perform all specified duties impartially and diligently.
4. I will preserve the confidentiality of the institutional information to which I am privy. This includes sharing information with an outside consulting agency.
5. I will, while representing ACICS, subscribe to the ACICS policy on Discrimination and Harassment during any and all interactions with the ACICS staff, other members of evaluation teams, or any person affiliated with an institution being evaluated. I have read the ACICS Policy on Discrimination and Harassment and will report to the ACICS President any action I perceive to be discriminatory or harassing.
6. I will refrain from any inappropriate business activity, in fact or appearance, relative to accreditation responsibilities related to serving on any evaluation team at any institution accredited by ACICS.
7. I will not solicit or accept any consulting requests from an institution for which I have served as a team member for a period of at least three years following the visit, regardless of my status as an evaluator. Active solicitation during an on-site review will result in immediate suspension of active service as an evaluator.
8. I will notify ACICS if I accept any contractual agreements, involving compensation, from any ACICS-accredited institutions in order to prospectively remove myself from any ACICS activities relative to that institution.

**By signing below, I acknowledge that I have read and will abide by these Canons of Ethical Behavior.**

\_\_\_\_\_  
Full Name

\_\_\_\_\_  
Signature & Date



ACCREDITING COUNCIL FOR INDEPENDENT COLLEGES AND SCHOOLS

Canons of Ethical Behavior

Revised September 2011

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By signing below, I acknowledge that I have read and will abide by these Canons of Ethical Behavior.

Sheila Kanderdash
Full Name

(b)(6)
Signature & Date

9-13-16

Vertical text on the left margin, possibly a page number or reference code.



ACCREDITING COUNCIL FOR INDEPENDENT COLLEGES AND SCHOOLS  
**Canons of Ethical Behavior**

Revised: August 2016

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6. I will refrain from any business activity inappropriate, in fact or appearance, relative to accreditation responsibilities, including soliciting consulting work from an ACICS-accredited institution or accepting fees from an ACICS-accredited institution or affiliated third party for any service as a consultant.
7. I will decline to serve on any evaluation team which is responsible for evaluating any institution or branch of any institution I have or prospectively intends to be involved in, in any capacity.
8. I will contact ACICS and ask to be placed on "inactive" status should I accept any consulting offer from any ACICS-accredited institution resulting in any compensation.
9. I will decline any consulting request from an institution for which I have served as a team member for three years following the visit, regardless of my status as an evaluator.

**By signing below, I acknowledge that I have read and will abide by these Canons of Ethical Behavior.**

**George Fakhoury**

Full Name

(b)(6)

Signature & Date



ACCREDITING COUNCIL FOR INDEPENDENT COLLEGES AND SCHOOLS  
**Canons of Ethical Behavior**

Revised September 2016

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**By signing below, I acknowledge that I have read and will abide by these Canons of Ethical Behavior.**

Wynan Dickey  
Full Name

(b)(6)  
  
Signature & Date 9/15/16



# ACCREDITING COUNCIL FOR INDEPENDENT COLLEGES AND SCHOOLS

## Canons of Ethical Behavior

Revised by the Board of Directors 2014

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5. I will, while representing ACICS, subscribe to the ACICS policy on Discrimination and Harassment during any and all interactions with the ACICS staff, other members of evaluation teams, or any person affiliated with an institution being evaluated. I have read the ACICS Policy on Discrimination and Harassment and will report to the ACICS President any action I perceive to be discriminatory or harassing.
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8. I will notify ACICS if I accept any contractual agreements, involving compensation, from any ACICS-accredited institutions in order to prospectively remove myself from any ACICS activities relative to that institution.

**By signing below, I acknowledge that I have read and will abide by these Canons of Ethical Behavior.**

Amanda S. King  
Full Name

(b)(6)

Signature & Date



ACCREDITING COUNCIL FOR INDEPENDENT COLLEGES AND SCHOOLS  
**Canons of Ethical Behavior**

Revised: September 2016

*Members of onsite evaluation teams play a vital role in the application of ACICS policies, procedures, and standards focused on the evaluation and measurement of institutional performance consistent with the high level of integrity demanded of accreditation. Accordingly, the fulfillment of this role requires a clear and compelling understanding by evaluators of their function in the accreditation process.*

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**By signing below, I acknowledge that I have read and will abide by these Canons of Ethical Behavior.**

Judith Bernstein  
Full Name

(b)(6)  
Signature & Date

5/24/17



## Canons of Ethical Behavior

Revised: September 2016

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GEORGE FAKHOURY  
Full Name

(b)(6)  


Signature & Date

5-24-2017



Canons of Ethical Behavior

Revised: September 2016

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HARPAL S. DHILLON
Full Name

(b)(6)
[Redacted Signature]

Signature & Date

5/24/2017



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Revised: September 2016

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Niel A Scott  
Full Name

(b)(6)

Signature & Date



Canons of Ethical Behavior

Revised: September 2016

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Lisa Bynne-Plaster

15 May 17

(b)(6)





## Canons of Ethical Behavior

Revised: September 2016

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Judee A. Timm

Full Name

(b)(6)

Signature & Date

5/4/17



Canons of Ethical Behavior

Revised: September 2016

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Carol Kizer
Full Name

(b)(6)

Signature & Date 5/15/2017

**Case Name:** *In the Matter of* Accrediting Council for  
Independent Colleges and Schools

**Docket No.:** 16-44-O

**Filing Party:** Respondent, Accrediting Council for Independent  
Colleges and Schools

**Exhibit No.:** B-O-104

## Michelle Edwards

---

**From:** Michelle Edwards  
**Sent:** Thursday, May 10, 2018 10:45 AM  
**To:** 'Scott DeBoer'  
**Subject:** RE: Invitation - ACICS Visit to Pioneer Pacific College in Wilsonville, OR - June 11, 2018

Scott,

Thanks for your quick response. I was unaware of the relationship between SBBC and Pioneer Pacific, thank you for letting me know. I appreciate you sharing the conflict of interest and we will take note.

Michelle

---

**From:** Scott DeBoer [<mailto:>] ]  
**Sent:** Thursday, May 10, 2018 12:19 AM  
**To:** Michelle Edwards  
**Subject:** RE: Invitation - ACICS Visit to Pioneer Pacific College in Wilsonville, OR - June 11, 2018

Hi Michelle. All's well and trust the same's true of you.

I'd absolutely love to join you on the visit to Pioneer Pacific College. However, our College has offered Pioneer Pacific College assistance in the past, so my participation may be a conflict of interest. Additionally, I have served with the Pioneer Pacific College's owners on different industry-based groups. Hence, it might be best if I pass on this particular visit as I certainly want to avoid any conflict that could potentially arise from my participation.

Having said that, I'm open to pretty much any other visit, assuming there's no conflict of interest. Just let me know when and where and I'll do my absolute best to help out.

Apologies for having to pass on this visit, but know you'll understand given the circumstances. Please let me know what else you need as I'd enjoy serving again.

---

**From:** Michelle Edwards [[medwards@acics.org](mailto:medwards@acics.org)]  
**Sent:** Wednesday, May 09, 2018 2:25 PM  
**To:** Scott DeBoer  
**Subject:** Invitation - ACICS Visit to Pioneer Pacific College in Wilsonville, OR - June 11, 2018

Hello Scott!

I hope you are doing well.

I would like to invite you to join me on a Quality Assurance Monitoring visit to Pioneer Pacific College in Wilsonville, OR (just outside of Portland) on Monday, June 11, 2018. Your duties would be to cover the following:

- Educational Activities (small team to include staff and two members)

The team would arrive in the Wilsonville, OR on Sunday afternoon, June 10<sup>th</sup> and depart at your leisure on Tuesday, June 12<sup>th</sup>.

Please let me know as soon as possible if you would be interested and able to join me on this visit!

Michelle Edwards  
President and CEO

**Accrediting Council for Independent Colleges and Schools**

750 First Street, NE | Suite 980 | Washington, DC 20002

[www.acics.org](http://www.acics.org) | 202.336.6780 - p | 202.842.2593 - f

**CONFIDENTIALITY NOTICE:**

This communication is only intended for the persons or entities to which it is addressed or copied and may contain information that is confidential and/or privileged in some way. Distribution or copying of this communication or the information contained herein is not expressly authorized. ACICS reserves the right to disclose this communication as required by law without the consent of the persons or entities to which this communication is addressed.

**Case Name:** *In the Matter of* Accrediting Council for Independent Colleges and Schools

**Docket No.:** 16-44-O

**Filing Party:** Respondent, Accrediting Council for Independent Colleges and Schools

**Exhibit No.:** B-O-105

## Michelle Edwards

---

**From:** Perliter Walters-Gilliam  
**Sent:** Thursday, May 10, 2018 2:10 PM  
**To:** Andre McDuffie  
**Cc:** Michelle Edwards  
**Subject:** RE: ACICS - Invitation to Fortis Institute

As formal follow up Andre, given that his association with the institution was less than 5 years (3), it is a conflict so he cannot serve. Let him know – thanks!

**Ms. Perliter Walters-Gilliam**  
Vice President - Accreditation  
**Accrediting Council for Independent Colleges and Schools**  
750 First Street, NE | Suite 980 | Washington, DC 20002  
[www.acics.org](http://www.acics.org) | 202.336.6769 - p |

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---

**From:** Andre McDuffie  
**Sent:** Thursday, May 10, 2018 11:08 AM  
**To:** Perliter Walters-Gilliam <[PWGilliam@acics.org](mailto:PWGilliam@acics.org)>  
**Subject:** FW: ACICS - Invitation to Fortis Institute  
**Importance:** High

Please advise if you see this as a conflict of interest or not.

---

**From:** George Fakhoury [<mailto:>] ]  
**Sent:** Wednesday, May 09, 2018 8:23 PM  
**To:** Andre McDuffie  
**Subject:** Re: ACICS - Invitation to Fortis Institute

Andre

Thank you for inviting me to conduct this visit. I am available and willing to participate. However, many years ago, I was an online member for their advisory board for their medical programs in Georgia I believe. It should not be a conflict of interest.

Please let me know if I am still considered for the visit or not.

Have a blessed day.

George Fakhoury

Sent from my iPhone

On May 9, 2018, at 2:53 PM, Andre McDuffie <[amcduffie@acics.org](mailto:amcduffie@acics.org)> wrote:

Hello Dr. Fakhoury,

My name is Andre McDuffie and I am conducting a visit to Fortis College in Landover, MD for their renewal of accreditation visit. The dates of the visit are as follows:

- June 21-22, 2018

Please let me know if you are available for these dates. Additionally, if you agree, I would like for you to review the following programs:

- Medical Billing and Coding
- Pharmacy Technician

Kind regards,

**Mr. Andre McDuffie, MS, SHRM-CP, aPHR**  
HR Generalist; Accreditation Coordinator  
**Accrediting Council for Independent Colleges and Schools**  
750 First Street, NE | Suite 980 | Washington, DC 20002  
[www.acics.org](http://www.acics.org) | 202.336.6767 - p | 202.842.2593 - f  
Follow us on Twitter - <http://twitter.com/acicsaccredits>  
Like us on Facebook - <http://facebook.com/acicsaccredits>

<image001.png>CONFIDENTIALITY NOTICE:

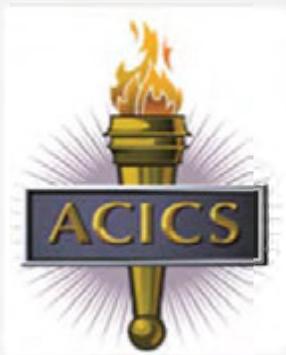
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**Case Name:** *In the Matter of* Accrediting Council for Independent Colleges and Schools

**Docket No.:** 16-44-O

**Filing Party:** Respondent, Accrediting Council for Independent Colleges and Schools

**Exhibit No.:** B-O-106



## COUNCIL

### STANDARDS OF ETHICAL RESPONSIBILITY

Each commissioner must read and comply with the following Standards of Ethical Responsibility in performing their ACICS duties:

1. A commissioner shall uphold the integrity of the accreditation process.
2. A commissioner shall avoid impropriety or the appearance of impropriety in all activities.
3. A commissioner shall perform the duties, as outlined in Article III of the Bylaws, impartially and diligently.
4. A commissioner shall refrain from any activity that might call into question their fiduciary responsibility.
5. A commissioner shall, in a timely manner, disclose to the Council any actual, potential, or appearance of a conflict of interest and shall not participate in Council actions regarding an institution that is the subject of that conflict.
6. A commissioner shall preserve the confidentiality of Council deliberations, institutional data, and ACICS business information.
7. A commissioner shall exercise discretion in advocating for, or against, a policy which may impact an institution with which he or she is associated.
8. A commissioner shall not violate the ACICS [Policy on Discrimination and Harassment](#) in interactions with other commissioners, staff, evaluators, or any person associated with a member institution.
9. A commissioner shall not solicit or accept, either for themselves or a family member, anything of value from an ACICS-accredited institution or an applicant institution seeking ACICS accreditation.

A commissioner shall immediately inform the Chair and/or Vice-Chair of any potential violation of these Standards. The Chair and/or Vice-Chair will determine that no violation has occurred and will notify the Ethics Review Board for follow up review and action, as applicable. The commissioner involved shall have the opportunity to respond to the allegation in writing to the Ethics Review Board which shall subsequently provide a

recommendation to the Council for final action. If the Council determines that a serious violation has occurred, it may remove the commissioner by a two-thirds vote. The Council shall, in all cases, take such action as necessary in order to maintain the integrity of ACICS.

Council Staff assigns institutions under review to commissioners prior to each meeting, and in doing so, distributes them in such a way as to avoid conflicts of interest. If a commissioner has any material interest in an institution or feels that there would be any conflict of interest, or appearance of the same, in his or her assignment to an institution's file, the commissioner must notify the Chair to request a reassignment of that file review and should, as appropriate, recuse or abstain from participating in the deliberations. The recusal or abstention will be recorded in the minutes

Within 30 days after the close of the Council meeting, all institutions on the agenda are notified in writing of any action taken by the Council. These actions must be kept confidential until official notification from the Council.

After the Council meeting, commissioners frequently will receive calls from representatives of institutions that were on the agenda who are seeking information concerning the action the Council has taken on their institutions. Commissioners should advise callers to contact the Council office for appropriate information following receipt of the action in writing.

**The commissioner, by signing below, acknowledges that they have read and will abide by these Standards of Ethical Responsibility.**

<input type="text" value="Richard Bennett"/>	<input type="text" value="Southern Technical College"/>
<b>Full Name of Commissioner</b>	<b>Institution/Employer Affiliation</b>
<input checked="" type="checkbox"/> <b>Signature</b>	<input type="text" value="4/3/2017"/> <input type="text" value="1:33:50 PM"/>
<b>(Checking the box above is equivalent to your signature)</b>	<b>Date</b>

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<b>Full Name of Commissioner</b>	<b>Institution/Employer Affiliation</b>
<input checked="" type="checkbox"/> <b>Signature</b>	<input type="text" value="7/31/2017"/> <input type="text" value="2:41:04 PM"/>
<b>(Checking the box above is equivalent to your signature)</b>	<b>Date</b>

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<input checked="" type="checkbox"/> <b>Signature</b>	<input type="text" value="4/9/2018"/> <input type="text" value="12:14:28 PM"/>
<b>(Checking the box above is equivalent to your signature)</b>	<b>Date</b>

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<input type="text" value="Adriene Hobby"/>	<input type="text" value="Montgomery County Community Coll..."/>
<b>Full Name of Commissioner</b>	<b>Institution/Employer Affiliation</b>
<input checked="" type="checkbox"/> <b>Signature</b>	<input type="text" value="3/27/2017"/> <input type="text" value="1:16:25 PM"/>
<b>(Checking the box above is equivalent to your signature)</b>	<b>Date</b>

recommendation to the Council for final action. If the Council determines that a serious violation has occurred, it may remove the commissioner by a two-thirds vote. The Council shall, in all cases, take such action as necessary in order to maintain the integrity of ACICS.

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<input type="text" value="Adriene Hobdy"/>	<input type="text" value="Montgomery County Community Coll..."/>
<b>Full Name of Commissioner</b>	<b>Institution/Employer Affiliation</b>
<input checked="" type="checkbox"/> <b>Signature</b>	<input type="text" value="7/31/2017"/> <input type="text" value="12:17:11 PM"/>
<b>(Checking the box above is equivalent to your signature)</b>	<b>Date</b>

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<input type="text" value="Adriene Hobdy"/>	<input type="text" value="MCCC"/>
<b>Full Name of Commissioner</b>	<b>Institution/Employer Affiliation</b>
<input checked="" type="checkbox"/> <b>Signature</b>	<input type="text" value="11/28/2017"/> <input type="text" value="9:35:43 AM"/>
<b>(Checking the box above is equivalent to your signature)</b>	<b>Date</b>

recommendation to the Council for final action. If the Council determines that a serious violation has occurred, it may remove the commissioner by a two-thirds vote. The Council shall, in all cases, take such action as necessary in order to maintain the integrity of ACICS.

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<input type="text" value="Adriene Hobdy"/>	<input type="text" value="MCCC"/>
<b>Full Name of Commissioner</b>	<b>Institution/Employer Affiliation</b>
<input checked="" type="checkbox"/> <b>Signature</b>	<input type="text" value="4/8/2018"/> <input type="text" value="1:58:57 PM"/>
<b>(Checking the box above is equivalent to your signature)</b>	<b>Date</b>

recommendation to the Council for final action. If the Council determines that a serious violation has occurred, it may remove the commissioner by a two-thirds vote. The Council shall, in all cases, take such action as necessary in order to maintain the integrity of ACICS.

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<input type="text" value="Fardad Fateri"/>	<input type="text" value="UEI/FCC"/>
<b>Full Name of Commissioner</b>	<b>Institution/Employer Affiliation</b>
<input checked="" type="checkbox"/> <b>Signature</b>	<input type="text" value="4/3/2017"/> <input type="text" value="4:35:48 PM"/>
<b>(Checking the box above is equivalent to your signature)</b>	<b>Date</b>

recommendation to the Council for final action. If the Council determines that a serious violation has occurred, it may remove the commissioner by a two-thirds vote. The Council shall, in all cases, take such action as necessary in order to maintain the integrity of ACICS.

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<input type="text" value="fardad fateri"/>	<input type="text" value="International Education Corporation"/>
<b>Full Name of Commissioner</b>	<b>Institution/Employer Affiliation</b>
<input checked="" type="checkbox"/> <b>Signature</b>	<input type="text" value="7/31/2017"/> <input type="text" value="12:47:32 PM"/>
<b>(Checking the box above is equivalent to your signature)</b>	<b>Date</b>

recommendation to the Council for final action. If the Council determines that a serious violation has occurred, it may remove the commissioner by a two-thirds vote. The Council shall, in all cases, take such action as necessary in order to maintain the integrity of ACICS.

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<input type="text" value="fardad fateri"/>	<input type="text" value="Florida Career College"/>
<b>Full Name of Commissioner</b>	<b>Institution/Employer Affiliation</b>
<input checked="" type="checkbox"/> <b>Signature</b>	<input type="text" value="12/4/2017"/> <input type="text" value="1:16:38 PM"/>
<b>(Checking the box above is equivalent to your signature)</b>	<b>Date</b>

recommendation to the Council for final action. If the Council determines that a serious violation has occurred, it may remove the commissioner by a two-thirds vote. The Council shall, in all cases, take such action as necessary in order to maintain the integrity of ACICS.

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<input type="text" value="fardad fateri"/>	<input type="text" value="Florida Career College"/>
<b>Full Name of Commissioner</b>	<b>Institution/Employer Affiliation</b>
<input checked="" type="checkbox"/> <b>Signature</b>	<input type="text" value="4/9/2018"/> <input type="text" value="12:02:08 PM"/>
<b>(Checking the box above is equivalent to your signature)</b>	<b>Date</b>

recommendation to the Council for final action. If the Council determines that a serious violation has occurred, it may remove the commissioner by a two-thirds vote. The Council shall, in all cases, take such action as necessary in order to maintain the integrity of ACICS.

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Elizabeth M. Guinan	Retired - Public member
<b>Full Name of Commissioner</b>	<b>Institution/Employer Affiliation</b>
<input checked="" type="checkbox"/> <b>Signature</b>	3/30/2017 10:02:21 AM
<b>(Checking the box above is equivalent to your signature)</b>	<b>Date</b>

recommendation to the Council for final action. If the Council determines that a serious violation has occurred, it may remove the commissioner by a two-thirds vote. The Council shall, in all cases, take such action as necessary in order to maintain the integrity of ACICS.

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<input type="text" value="Elizabeth M. Guinan"/>	<input type="text" value="Retired"/>
<b>Full Name of Commissioner</b>	<b>Institution/Employer Affiliation</b>
<input checked="" type="checkbox"/> <b>Signature</b>	<input type="text" value="8/4/2017"/> <input type="text" value="11:02:10 AM"/>
<b>(Checking the box above is equivalent to your signature)</b>	<b>Date</b>

recommendation to the Council for final action. If the Council determines that a serious violation has occurred, it may remove the commissioner by a two-thirds vote. The Council shall, in all cases, take such action as necessary in order to maintain the integrity of ACICS.

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Elizabeth M. Guinan	Retired - The Art Institute of Charlotte
<b>Full Name of Commissioner</b>	<b>Institution/Employer Affiliation</b>
<input checked="" type="checkbox"/> <b>Signature</b>	11/29/2017 2:54:46 PM
<b>(Checking the box above is equivalent to your signature)</b>	<b>Date</b>

recommendation to the Council for final action. If the Council determines that a serious violation has occurred, it may remove the commissioner by a two-thirds vote. The Council shall, in all cases, take such action as necessary in order to maintain the integrity of ACICS.

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Elizabeth M. Guinan	Retired
<b>Full Name of Commissioner</b>	<b>Institution/Employer Affiliation</b>
<input checked="" type="checkbox"/> <b>Signature</b>	4/9/2018 11:57:41 AM
<b>(Checking the box above is equivalent to your signature)</b>	<b>Date</b>

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<input type="text" value="Judee Ann Timm"/>	<input type="text" value="Monterey Peninsula College"/>
<b>Full Name of Commissioner</b>	<b>Institution/Employer Affiliation</b>
<input checked="" type="checkbox"/> <b>Signature</b>	<input type="text" value="3/31/2017"/> <input type="text" value="9:14:59 PM"/>
<b>(Checking the box above is equivalent to your signature)</b>	<b>Date</b>

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<input type="text" value="Judee Timm"/>	<input type="text" value="Monterey Peninsula College"/>
<b>Full Name of Commissioner</b>	<b>Institution/Employer Affiliation</b>
<input checked="" type="checkbox"/> <b>Signature</b>	<input type="text" value="7/31/2017"/> <input type="text" value="1:18:57 PM"/>
<b>(Checking the box above is equivalent to your signature)</b>	<b>Date</b>

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<input type="text" value="Judee A. Timm"/>	<input type="text" value="Monterey Peninsula College"/>
<b>Full Name of Commissioner</b>	<b>Institution/Employer Affiliation</b>
<input checked="" type="checkbox"/> <b>Signature</b>	<input type="text" value="12/1/2017"/> <input type="text" value="6:03:11 PM"/>
<b>(Checking the box above is equivalent to your signature)</b>	<b>Date</b>

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<input type="text" value="Judee A. Timm"/>	<input type="text" value="Monterey Peninsula College"/>
<b>Full Name of Commissioner</b>	<b>Institution/Employer Affiliation</b>
<input checked="" type="checkbox"/> <b>Signature</b>	<input type="text" value="4/5/2018"/> <input type="text" value="6:41:11 PM"/>
<b>(Checking the box above is equivalent to your signature)</b>	<b>Date</b>

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Lawrence Eric Leak, PhD	Public Member
<b>Full Name of Commissioner</b>	<b>Institution/Employer Affiliation</b>
<input checked="" type="checkbox"/> <b>Signature</b>	3/28/2017 12:21:46 PM
<b>(Checking the box above is equivalent to your signature)</b>	<b>Date</b>

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<input type="text" value="Lawrence E. Leak"/>	<input type="text" value="Public Member"/>
<b>Full Name of Commissioner</b>	<b>Institution/Employer Affiliation</b>
<input checked="" type="checkbox"/> <b>Signature</b>	<input type="text" value="7/22/2017"/> <input type="text" value="2:18:41 PM"/>
<b>(Checking the box above is equivalent to your signature)</b>	<b>Date</b>

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<input type="text" value="Lawrence E. Leak"/>	<input type="text" value="Public"/>
<b>Full Name of Commissioner</b>	<b>Institution/Employer Affiliation</b>
<input checked="" type="checkbox"/> <b>Signature</b>	<input type="text" value="12/4/2017"/> <input type="text" value="9:54:36 AM"/>
<b>(Checking the box above is equivalent to your signature)</b>	<b>Date</b>

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<input type="text" value="Lawrence Leak"/>	<input type="text" value="Public"/>
<b>Full Name of Commissioner</b>	<b>Institution/Employer Affiliation</b>
<input checked="" type="checkbox"/> <b>Signature</b>	<input type="text" value="4/4/2018"/> <input type="text" value="10:44:52 AM"/>
<b>(Checking the box above is equivalent to your signature)</b>	<b>Date</b>

recommendation to the Council for final action. If the Council determines that a serious violation has occurred, it may remove the commissioner by a two-thirds vote. The Council shall, in all cases, take such action as necessary in order to maintain the integrity of ACICS.

Council Staff assigns institutions under review to commissioners prior to each meeting, and in doing so, distributes them in such a way as to avoid conflicts of interest. If a commissioner has any material interest in an institution or feels that there would be any conflict of interest, or appearance of the same, in his or her assignment to an institution's file, the commissioner must notify the Chair to request a reassignment of that file review and should, as appropriate, recuse or abstain from participating in the deliberations. The recusal or abstention will be recorded in the minutes

Within 30 days after the close of the Council meeting, all institutions on the agenda are notified in writing of any action taken by the Council. These actions must be kept confidential until official notification from the Council.

After the Council meeting, commissioners frequently will receive calls from representatives of institutions that were on the agenda who are seeking information concerning the action the Council has taken on their institutions. Commissioners should advise callers to contact the Council office for appropriate information following receipt of the action in writing.

**The commissioner, by signing below, acknowledges that they have read and will abide by these Standards of Ethical Responsibility.**

<input type="text" value="Martha Loveman"/>	<input type="text"/>
<b>Full Name of Commissioner</b>	<b>Institution/Employer Affiliation</b>
<input checked="" type="checkbox"/> <b>Signature</b>	<input type="text" value="4/3/2017"/> <input type="text" value="1:00:56 PM"/>
<b>(Checking the box above is equivalent to your signature)</b>	<b>Date</b>

recommendation to the Council for final action. If the Council determines that a serious violation has occurred, it may remove the commissioner by a two-thirds vote. The Council shall, in all cases, take such action as necessary in order to maintain the integrity of ACICS.

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**The commissioner, by signing below, acknowledges that they have read and will abide by these Standards of Ethical Responsibility.**

<input type="text" value="Tibby Loveman"/>	<input type="text" value="Public member"/>
<b>Full Name of Commissioner</b>	<b>Institution/Employer Affiliation</b>
<input checked="" type="checkbox"/> <b>Signature</b>	<input type="text" value="7/24/2017"/> <input type="text" value="9:36:57 PM"/>
<b>(Checking the box above is equivalent to your signature)</b>	<b>Date</b>

recommendation to the Council for final action. If the Council determines that a serious violation has occurred, it may remove the commissioner by a two-thirds vote. The Council shall, in all cases, take such action as necessary in order to maintain the integrity of ACICS.

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**The commissioner, by signing below, acknowledges that they have read and will abide by these Standards of Ethical Responsibility.**

<input type="text" value="Martha Loveman"/>	<input type="text"/>
<b>Full Name of Commissioner</b>	<b>Institution/Employer Affiliation</b>
<input checked="" type="checkbox"/> <b>Signature</b>	<input type="text" value="11/28/2017"/> <input type="text" value="6:04:11 PM"/>
<b>(Checking the box above is equivalent to your signature)</b>	<b>Date</b>

recommendation to the Council for final action. If the Council determines that a serious violation has occurred, it may remove the commissioner by a two-thirds vote. The Council shall, in all cases, take such action as necessary in order to maintain the integrity of ACICS.

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**The commissioner, by signing below, acknowledges that they have read and will abide by these Standards of Ethical Responsibility.**

<input type="text" value="Martha Loveman"/>	<input type="text"/>
<b>Full Name of Commissioner</b>	<b>Institution/Employer Affiliation</b>
<input checked="" type="checkbox"/> <b>Signature</b>	<input type="text" value="4/9/2018"/> <input type="text" value="12:11:14 PM"/>
<b>(Checking the box above is equivalent to your signature)</b>	<b>Date</b>

**Case Name:** *In the Matter of* Accrediting Council for Independent Colleges and Schools

**Docket No.:** 16-44-O

**Filing Party:** Respondent, Accrediting Council for Independent Colleges and Schools

**Exhibit No.:** B-O-107

**APRIL 2017 - FULL COUNCIL**

**ABSTENTIONS LIST**

*Please initial when you have reviewed this list. List should be returned to Karly when all have reviewed.*

- Commissioner Bennett*
- Commissioner Blake*
- Commissioner Edwards*
- Commissioner Euliano*
- Commissioner Fateri*
- Commissioner Guinan*
- Commissioner Hobby*
- Commissioner Jones*
- Commissioner Leak*
- Commissioner Loveman*
- Commissioner Ramirez-Rivera*
- Commissioner Swartzwelder*
- Commissioner Thomas*
- Commissioner Timm*

(b)(6)

			RECUSED
Campus Name	ACICS ID	Class	Commissioner
Agape College of Business and Science, Fresno, CA	00240200	MAIN	
American Educational College, Vega Alta, PR	00020978	B	<i>RM</i>
American Institute of Healthcare & Technology, Stratford, CT	00259084	MAIN	
American National University, Florence, KY	00010154	B	
American National University, Pikeville, KY	00010725	B	
American National University, Pikeville, KY	00010725	B	
American National University, Richmond, KY	00010456	B	
American National University, South Bend, IN	00037761	B	
American University of Health Sciences, Signal Hill, CA	00020207	MAIN	
Art Institute of Indianapolis, Indianapolis, IN	00032160	B	
Art Institute of Las Vegas, Henderson, NV	00032209	B	
Art Institute of Las Vegas, Henderson, NV	00032209	B	
Art Institute of Las Vegas, Henderson, NV	00032209	B	
Art Institute of Phoenix, Phoenix, AZ	00016228	MAIN	
Art Institute of Salt Lake City, Draper, UT	00032150	B	
BAU International University, Washington, DC	00275488	MAIN	
Branford Hall Career Institute, Springfield, MA	00018785	B	
Brightwood College, Hammond, IN	00010363	MAIN	<i>RM</i>
Brown Mackie College - Akron, Akron, OH	00011239	B	
Brown Mackie College - Atlanta, Atlanta, GA	00020239	B	
Brown Mackie College - Cincinnati, Cincinnati, OH	00010572	B	
Brown Mackie College - Findlay, Findlay, OH	00010165	B	
Brown Mackie College - Fort Wayne, IN	00010218	B	
Brown Mackie College - Greenville, Greenville, SC	00024800	B	
Brown Mackie College - Indianapolis, Indianapolis, IN	00023533	B	
Brown Mackie College - Louisville, Louisville, KY	00020244	B	
Brown Mackie College - San Antonio, San Antonio, TX	00041546	B	
Brown Mackie College - South Bend, South Bend, IN	00010695	B	
Brown Mackie College - St. Louis, Fenton, MO	00029631	B	
Brown Mackie College - Tucson, Tucson, AZ	00011136	B	
Brown Mackie College - Tulsa, Tulsa, OK	00024239	B	
Bryan University, Los Angeles, CA	00011099	B	
Bryan University, Topeka, KS	00010128	MAIN	
California International Business University, San Diego, CA	00020292	MAIN	
California Miramar University, San Diego, CA	00024921	MAIN	
California University of Management and Sciences, Anaheim, CA	00021311	MAIN	
California University of Management and Sciences, Arlington, VA	00023818	MAIN	
Columbia College, Vienna, VA	00068978	MAIN	
Elmira Business Institute, Elmira, NY	00011107	MAIN	
Elmira Business Institute, Vestal, NY	00020757	B	
Empire College, Santa Rosa, CA	00010602	MAIN	
Everest College, Tacoma, WA	00020562	B	
Florida Academy of Nursing, Miramar, FL	00270253	MAIN	
Fortis Institute, Erie, PA	00010934	MAIN	
Gallipolis Career College, Gallipolis, OH	00011098	MAIN	

			RECUSED
Campus Name	ACICS ID	Class	Commissioner
Global Health College, Alexandria, VA	00036481	MAIN	
Gwinnett Institute, Orlando, FL	00269949	B	
Harris School of Business, Cherry Hill, NJ	00010547	MAIN	
Healing Hands Institute, Miami, FL	00267207	MAIN	
Hunter Business School, Levittown, NY	00010696	MAIN	
Hunter Business School, Medford, NY	00022604	B	
International Business College, Fort Wayne, IN	00011196	MAIN	
International College of Health Sciences, Boynton Beach, FL	00245831	MAIN	
International College of Health Sciences, Boynton Beach, FL	00245831	MAIN	
Laurel Technical Institute, Sharon, PA	00010838	MAIN	
Laurus College, Oxnard, CA	00060414	B	02
Laurus College, Oxnard, CA	00060414	B	02
Laurus College, Oxnard, CA	00060414	B	02
Laurus College, Oxnard, CA	00060414	B	02
Laurus College, Oxnard, CA	00060414	B	02
Laurus College, Oxnard, CA	00060414	B	02
Laurus College, San Luis Obispo, CA	00023501	MAIN	02
Laurus College, San Luis Obispo, CA	00023501	MAIN	02
Laurus College, San Luis Obispo, CA	00023501	MAIN	02
Laurus College, San Luis Obispo, CA	00023501	MAIN	02
Laurus College, San Luis Obispo, CA	00023501	MAIN	02
Laurus College, San Luis Obispo, CA	00023501	MAIN	02
McCann School of Business & Technology, Carlisle, PA	00029269	B	
McCann School of Business & Technology, Dickson City, PA	00020097	B	
Miami-Jacobs Career College, Dayton, OH	00010254	B	
Miami-Jacobs Career College, Springboro, OH	00022116	B	
Miami-Jacobs Career College, Troy, OH	00023417	B	
Miller-Motte Technical College, Gulfport, MS	00048170	B	
National College, Bartlett, TN	00023525	B	
New York Institute of English and Business, New York, NY	00011328	MAIN	
Niels Brock Copenhagen Business College, Copenhagen K, Denmark	00171290	MAIN	
Nobel University - Buena Park, Buena Park, CA	00240580	B	
Northwestern Polytechnic University, Fremont, CA	00015527	MAIN	
Northwestern Polytechnic University, Fremont, CA	00015527	MAIN	
Peloton College, Dallas, TX	00024852	MAIN	
Peloton College, Dallas, TX	00024852	MAIN	
Peloton College, Dallas, TX	00024852	MAIN	
PITC Institute, Wyncote, PA	00025097	MAIN	02
Redstone College - Denver East, Westminster, CO	00168008	B	
Redstone College, Broomfield, CO	00027075	MAIN	
Ridley-Lowell Business & Technical Inst., New London, CT	00011303	MAIN	
Ridley-Lowell Business & Technical Inst., New London, CT	00011303	MAIN	
Ridley-Lowell Business & Technical Institute, Danbury, CT	00033448	B	
Sentara College of Health Sciences, Chesapeake, VA	00024346	MAIN	

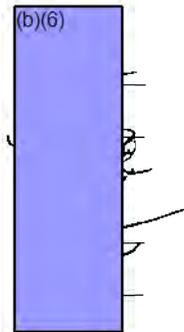
			RECUSED
Campus Name	ACICS ID	Class	Commissioner
Si Tanka University, Sioux Falls, SD	00276405	MAIN	
Silicon Valley University, San Jose, CA	00019408	MAIN	
South Baylo University - Virginia, Annandale, VA	00236409	B	
South Baylo University, Anaheim, CA	00230247	MAIN	
Stratford University, Falls Church, VA	00019411	MAIN	
Texas Health and Science University, Austin, TX	00103319	MAIN	
University of North America, Vienna, VA	00228584	MAIN	
Vet Tech Institute of Houston, Houston, TX	00010596	MAIN	
Virginia College, Lubbock, TX	00221316	B	<i>wt</i>

***APRIL 2017 - ABSTENTIONS LIST***

*Please initial when you have reviewed this list. List should be returned to Karly when all have reviewed.*

**COMMITTEE A**

- \*Commissioner Euliano*
- Commissioner Blake*
- Commissioner Edwards*
- Commissioner Leak*
- Commissioner Swartzwelder*



\*denotes Committee Chair

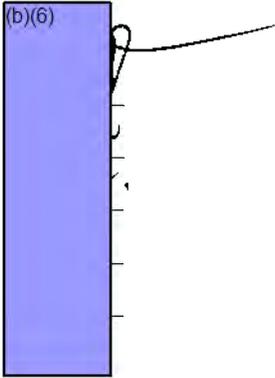


***APRIL 2017 - ABSTENTIONS LIST***

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**COMMITTEE B**

- \*Commissioner Thomas*
- Commissioner Guinan*
- Commissioner Hobdy*
- Commissioner Jones*
- Commissioner Ramirez-Rivera*



\*denotes Committee Chair

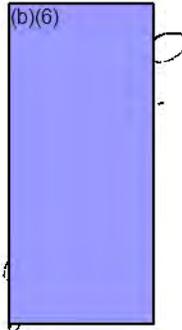
			RECUSED
Campus Name	ACICS ID	Class	Commissioner
American Institute of Healthcare & Technology, Stratford, CT	00259084	MAIN	
American National University, Florence, KY	00010154	B	
American National University, Pikeville, KY	00010725	B	
American National University, Pikeville, KY	00010725	B	
American National University, Richmond, KY	00010456	B	
American National University, South Bend, IN	00037761	B	
BAU International University, Washington, DC	00275488	MAIN	
California Miramar University, San Diego, CA	00024921	MAIN	
California University of Management and Sciences, Anaheim, CA	00021311	MAIN	
California University of Management and Sciences, Arlington, VA	00023818	MAIN	
Elmira Business Institute, Elmira, NY	00011107	MAIN	
Elmira Business Institute, Vestal, NY	00020757	B	
Empire College, Santa Rosa, CA	00010602	MAIN	
Everest College, Tacoma, WA	00020562	B	
Fortis Institute, Erie, PA	00010934	MAIN	
Gallipolis Career College, Gallipolis, OH	00011098	MAIN	
Global Health College, Alexandria, VA	00036481	MAIN	
Harris School of Business, Cherry Hill, NJ	00010547	MAIN	
Hunter Business School, Levittown, NY	00010696	MAIN	
Hunter Business School, Medford, NY	00022604	B	
McCann School of Business & Technology, Carlisle, PA	00029269	B	
McCann School of Business & Technology, Dickson City, PA	00020097	B	
Miami-Jacobs Career College, Dayton, OH	00010254	B	
Miami-Jacobs Career College, Springboro, OH	00022116	B	
Miami-Jacobs Career College, Troy, OH	00023417	B	
Miller-Motte Technical College, Gulfport, MS	00048170	B	
National College, Bartlett, TN	00023525	B	
Peloton College, Dallas, TX	00024852	MAIN	
Peloton College, Dallas, TX	00024852	MAIN	
Peloton College, Dallas, TX	00024852	MAIN	
PITC Institute, Wyncote, PA	00025097	MAIN	<i>DJA</i>
South Baylo University, Anaheim, CA	00230247	MAIN	
South Baylo University - Virginia, Annandale, VA	00236409	B	

## ***APRIL 2017 - ABSTENTIONS LIST***

*Please initial when you have reviewed this list. List should be returned to Karly when all have reviewed.*

### **COMMITTEE C**

*\*Commissioner Fateri  
Commissioner Bennett  
Commissioner Loveman  
Commissioner Timm*



\*denotes Committee Chair

RECUSED			
Campus Name	ACICS ID	Class	Commissioner
American Educational College, Vegas Alta, PR	00020978	B	
American University of Health Sciences, Signal Hill, CA	00020207	MAIN	
Brown Mackie College - Akron, Akron, OH	00011239	B	
Brown Mackie College - Atlanta, Atlanta, GA	00020239	B	
Brown Mackie College - Cincinnati, Cincinnati, OH	00010572	B	
Brown Mackie College - Findlay, Findlay, OH	00010165	B	
Brown Mackie College - Fort Wayne, IN	00010218	B	
Brown Mackie College - Greenville, Greenville, SC	00024800	B	
Brown Mackie College - Indianapolis, Indianapolis, IN	00023533	B	
Brown Mackie College - Louisville, Louisville, KY	00020244	B	
Brown Mackie College - San Antonio, San Antonio, TX	00041546	B	
Brown Mackie College - South Bend, South Bend, IN	00010695	B	
Brown Mackie College - St. Louis, Fenton, MO	00029631	B	
Brown Mackie College - Tucson, Tucson, AZ	00011136	B	
Brown Mackie College - Tulsa, Tulsa, OK	00024239	B	
Bryan University, Los Angeles, CA	00011099	B	
Bryan University, Topeka, KS	00010128	MAIN	
California International Business University, San Diego, CA	00020292	MAIN	
Columbia College, Vienna, VA	00068978	MAIN	
Florida Academy of Nursing, Miramar, FL	00270253	MAIN	
International Business College, Fort Wayne, IN	00011196	MAIN	
International College of Health Sciences, Boynton Beach, FL	00245831	MAIN	
International College of Health Sciences, Boynton Beach, FL	00245831	MAIN	
New York Institute of English and Business, New York, NY	00011328	MAIN	
Nobel University - Buena Park, Buena Park, CA	00240580	B	
Redstone College, Broomfield, CO	00027075	MAIN	
Redstone College - Denver East, Westminster, CO	00168008	B	
Sentara College of Health Sciences, Chesapeake, VA	00024346	MAIN	
Si Tanka University, Sioux Falls, SD	00276405	MAIN	
Stratford University, Falls Church, VA	00019411	MAIN	
Texas Health and Science University, Austin, TX	00103319	MAIN	
Virginia College, Lubbock, TX	00221316	B	

**Case Name:** *In the Matter of* Accrediting Council for Independent Colleges and Schools

**Docket No.:** 16-44-O

**Filing Party:** Respondent, Accrediting Council for Independent Colleges and Schools

**Exhibit No.:** B-O-108

**ACCREDITING COUNCIL  
FOR  
INDEPENDENT COLLEGES AND SCHOOLS**

**OFFICIAL MINUTES OF THE MEETING OF THE COUNCIL**

ACICS OFFICE  
750 First Street, NE, Suite 980  
Washington, D.C. 20002  
April 3-7, 2017

**Tuesday, April 4, 2017**

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**MEETING PARTICIPANTS**

**Commissioners**

Ms. Michelle Edwards, *Chair*  
Mr. Roger Swartzwelder, *Chair-Elect*  
Ms. Julie Blake, *Treasurer*  
Mr. John D. Euliano, *Secretary*  
Dr. Lawrence Leak, *Executive Committee Member*  
Mr. Richard Bennett  
Dr. Fardad Fateri  
Ms. Elizabeth M. Guinan  
Dr. Adriene K. Hobby

Dr. Deborah Jones  
Ms. Martha E. Loveman  
Dr. Rafael Ramirez-Rivera  
Dr. Edward Thomas  
Dr. Judee Timm

**Staff**

Mr. Roger Williams, Interim President  
Ms. Corrisa Barker, Program Analyst  
Ms. Anne Bennett, Accreditation Coordinator  
Ms. Latoya Boyd, Accreditation Coordinator  
Ms. Jan Chambers, Accreditation Coordinator  
Mr. Quentin Dean, Senior Regulatory Affairs Coordinator  
Mr. Steven Gelfound, Vice President of Operations  
Ms. Trina Green, Senior Accounting Manager  
Dr. Terron King, Senior Manager, Institutional and Program Review  
Ms. Cathy Kouko, Accreditation Coordinator  
Ms. Linda Lundberg, Accreditation Content Editor  
Mr. Andre McDuffie, Senior Human Resources Coordinator  
Ms. Niana Moore, Accreditation Coordinator  
Ms. Katie Morrison, Accreditation Coordinator  
Ms. Andrea Reid, Assistant Manager, Administration  
Ms. R. Kay Ropko, Senior Systems Manager  
Ms. Shaniqua Smith, Program Analyst I  
Mr. Maurice Wadlington, Senior Accreditation Coordinator  
Ms. Perliter Walters-Gilliam, Vice President of Accreditation  
Ms. Karly Zeigler, Manager of Institutional Compliance

**CALL TO ORDER**

**I. Call to Order**

Chair Michelle Edwards called the meeting to order at 8:48 a.m. on Tuesday, April 4, 2017.

**II. Approval of Minutes**

The Council reviewed the minutes from the December 5-9, 2016, Council meeting; the Board meeting on December 5, 2016; Executive Committee meetings held from December 2016 through March 2017; and the February 9-10, 2017, Council Policy meeting.

**MOTION:** Approve the Council meeting minutes with an amendment to the December 5-9 Council Meeting Minutes to include Dr. Rafael Ramirez-

Rivera, Commissioner, and Corrisa Barker, Program Analyst, to the list of participants.

**MOVED:** Bennett

**SECONDED:** Leak

**ACTION:** Unanimously Approved

## OLD BUSINESS

### III. Consideration for Research/Development of Internationally-focused Standards

This item was previously discussed at the February Council meeting for further research and proposal by staff for the Council's consideration. Staff Zeigler shared the attached document (Exhibit A: Discussion Topics for Application of Quality Assurance Standards in the Accreditation of International Institutions) which was prepared by Dr. Joseph Gurubatham, Former Executive Vice President of Accreditation at ACICS, in 2015 when ACICS was experiencing significant interest by international institutions.

Recognizing that the current state of the agency, as the discussion revealed, did not place an immediate need for this Consideration of Internationally-focused standards, Staff Zeigler proposed establishing a committee who can take a long-range perspective in its review of all current standards and practices and how they align or conflict with international regulations or education standards. Zeigler noted that the document proposed by Dr. Gurubatham will need to be updated to reflect ACICS's current situation.

Chair Edwards asked who might be interested in serving on this committee, and many commissioners (including Timm, Jones, Guinan, Leak, Ramirez-Rivera, Bennett, and Swartzwelder) showed interest.

The Council directed staff to move forward with the setting up of a committee to begin the discussion on these matters. Interested Commissioners include: Dr. Timm, Dr. Jones, Dr. Leak, Dr. Ramirez-Rivera, and Mr. Swartzwelder.

### IV. Doctoral Moratorium Update

Commissioner Leak summarized the Council's progress on ending its inclusion of doctoral programs in the accredited status of its institutions. Ten (10) ACICS-accredited institutions currently offer doctoral programs. Following the Council's decision at its December 2016 meeting, a letter was sent to these institutions, on December 30, 2016, informing them of the ACICS decision to issue a moratorium on further acceptance of doctoral programs and to direct the phasing out of the existing doctoral programs. The institutions' feedback on a plan to teach out current doctoral students was solicited and ACICS (Commissioner Leak and Staff Williams) facilitated a conference call with these institutions on March 1, 2017.

Of the ten (10) institutions, five (5) shared they were ready to teach out their current doctoral students; and the other five (5) are seeking alternative accreditation in order to continue offering the doctoral program. Subsequently, on March 27, 2017, ACICS sent two correspondences to these two groups: One was sent to the institutions that indicated movement to a new accreditor. This letter asked for more information, including their application to, and timeline for, alternate accreditation and communication to students regarding accreditation of the program. The second letter was sent to institutions teaching out the program. This letter asked for a teach-out plan and communication to students regarding the teach-out.

In conclusion, Dr. Leak proposed the following statement for the Council’s consideration concerning its commitment to the cessation of including doctoral programs in its accreditation review:

Effective April 4, 2017, the moratorium approved by the Council on December 5, 2016, is now permanent and ACICS will no longer accept new doctoral programs. All existing doctoral programs are approved through December 31, 2019, to allow institutions to: 1) teach-out their currently enrolled students in an orderly manner or, 2) move from ACICS to another institutional accrediting agency.

**MOTION:** Accept the proposal with amendments as noted below:

Effective April 4, 2017, the moratorium approved by the Council on December 5, 2016, is now permanent and ACICS will no longer accept new applications for doctoral programs. All current institutions with existing doctoral programs ~~are approved through~~ have until December 31, 2019, to allow institutions to: 1) teach-out their currently enrolled doctoral students in an orderly manner or, 2) move from ACICS to another institutional accrediting agency.

**MOVED:** Leak  
**SECONDED:** Fateri  
**ACTION:** Unanimously Passed

## NEW BUSINESS

### V. Intent to Bar/Debarment Appeals

**COMMITTEE:** Full Council/4.17/1  
**DATE:** April 4, 2017  
**SUBJECT:** Intent to Bar/Debarment Appeal  
**STAFF:** Ms. Katie Morrison

---

**ISSUE:** The way the Criteria on debarment could be read is that an individual or entity may elect to appeal the intent to bar notice and the debarment action, when a debarment action. A slight revision/moving around of language will resolve this possible interpretation.

\*\*Staff would also like to clarify with Council if the appeal hearing is also one that the Council would like to designate as in-writing only (unless in-person is allowed by the Council). The necessary changes to the Criteria for this update are included below.

## **CRITERIA**

### **2-3-900 – DEBARMENT**

... The intent to bar notice will inform the person(s) or entity that they are entitled to present information and materials in writing ~~or in person~~ to appeal the intent to bar at the next scheduled meeting of the Council. The notice will stipulate that if they intend to appeal the intent to bar, the person(s) or entity must inform the Council office in writing within ten days of receipt of the notice ~~as to whether they will appeal the intent to bar in writing or in person.~~ The Council's decision is final if the person or entity elects not to appeal within ten days of the Council notification.

A debarment order may be issued by the Council as a result of its consideration of the facts presented in the appeal. The Council's decision is final and will be sent to the person(s) or entity by electronic and certified mail following their appeal before the Council.

~~The Council's decision is final if the person or entity elects not to appeal within ten days of Council notification. The Council's decision is also final following appeal...~~

## **OPTIONS**

1. Vote to approve the proposed policy presented below and publish it in the Memorandum to the Field.
2. Vote to approve the proposed policy with amendments shown below and publish it in the Memorandum to the Field:

### **2-3-900 – DEBARMENT**

... The intent to bar notice will inform the person(s) or entity that they are entitled to present information and materials in writing or in person to appeal the intent to bar at the next scheduled meeting of the Council. The notice will stipulate that if they intend to appeal the intent to bar, the person(s) or entity must inform the Council office in writing within ten days of receipt of the notice as to whether they will appeal the intent to bar in writing or in person. The Council's decision is final if the person or entity elects not to appeal within ten days of the Council notification.

A debarment order may be issued by the Council as a result of its consideration of the facts presented in the appeal. The Council's decision is final and will be sent to the person(s) or entity by electronic and certified mail following their appeal before the Council.

~~The Council's decision is final if the person or entity elects not to appeal within ten days of Council notification. The Council's decision is also final following appeal...~~

3. Recommend a different approach to policy issue as stated below:
4. Remove from further consideration.

---

**RECOMMENDATION:** Option 2

**MOVED:** Commissioner Bennett  
**SECONDED:** Commissioner Blake  
**ABSTENTION:** none  
**ACTION:** Unanimously Passed

**VI. Review Board Members and Expense of Appeals**

**COMMITTEE:** Full Council/4.17/2

**DATE:** April 4, 2017

**SUBJECT:** **Review Board Members and Expenses of an Appeal**

**STAFF:** Katie Morrison

---

**ISSUE:** In anticipation of the February policy meeting, the ACICS staff noted that currently the *Criteria* does not reflect the practices that ACICS has been exercising in handling the Review Board of Appeals, especially in regards to having a group of 15 persons, and having those individuals serve three year terms on the Review Board. At the policy meeting, the Council indicated its position that the practices described in the *Criteria* should continue to be followed, so the only change made in regards to the appointment of members of the Review Board is to use a "pool" of persons. The second paragraph of 2-3-602 and the Bylaws were altered for the consistency of listing "academic," "administrative" and "public" across *Criteria* sections in the indication of types of representatives

The *Criteria* also indicates that the institution would provide ACICS with a deposit for the expenses of the appeal hearing and receive a refund of any excess deposit, but we are currently charging the full fee of \$10,000 (\$5,000 for hearing + \$5,000 for panel members' expenses) in advance with no need for a refund. This will simplify practices for the accounting department, too.

Staff also wanted to inquire of the Council as to whether it should be the entire Council designating the Review Board panel members, or more appropriately, the Chair of the Council. The switch in language from “Council” to “Chair of the Council” is now included in the revisions below.

## CRITERIA

### 2-3-600 – REVIEW BOARD APPEAL PROCESS

**2-3-602. Appointment of Members.** The Review Board of Appeals shall consist of a pool of fifteen (15) persons, all of whom have had experience in accreditation, who are appointed to three-year terms. A person ~~appointed~~ shall not have been a commissioner within one year of appointment. The Review Board of Appeals shall consist of at least two (2) academic representatives, two (2) administrative representatives, and three (3) public members, as defined in Appendix A.

A Review Board of Appeals panel of three to seven persons, depending on the scope and complexity of the matter or institution being reviewed, will be designated by the Chair of the Council from the entire Review Board to hear an appeal from an institution. The ~~Chair Council~~ also will designate one member of the Review Board Panel to serve as chair. The selection and actions of the panel are subject to ACICS conflict of interest policies. A Review Board Panel will consist of at least ~~one (1) public, one (1) administrative, and one (1) academic, one (1) administrative, and one (1) public~~ representative as defined in Appendix A.

**2-3-608. Expenses of Appeal Hearing.** The institution shall bear the following expenses in connection with the appeal:

- (a) travel and subsistence of the Review Board panel members participating in the hearing; and
- (b) cost of the hearing room and transcription.

An appeals ~~fee deposit~~ must be remitted to ~~made with~~ the Council at the time of the filing of the notice of appeal described in Section 2-3-604. This fee deposit shall be applied to the expenses listed above, ~~and any excess deposit will be returned to the institution.~~

## APPENDIX A BYLAWS

### ARTICLE VII Appeals Process

*Section 1 – Review Board of Appeals.* A Review Board of Appeals shall be appointed by the Council. The purpose of the Review Board shall be to review, according to pre-established procedures and guidelines, appeals by members of final negative actions by the Council and in each case either to affirm the action of the Council, to remand the case to the Council for further review, or to amend or overturn the action. The Review Board shall consist of a pool of fifteen (15) persons, all of whom have had experience in accreditation. The Review Board shall include at least two (2) academic representatives, two (2) administrative representatives, and three (3)

public members, as defined in Article III, Section 1 herein. Review Board panels will consist of a minimum of three (3) members and be comprised of at least ~~one (1) public~~, one (1) academic, ~~and one (1) administrative~~, and one (1) public representative. Members shall be appointed to terms of three years, with terms of initial appointees staggered so that one-third of the terms expire each year. A person appointed to the Review Board shall not have been a commissioner within one year prior to appointment. The President shall convene timely a panel of the Review Board when necessary.

#### OPTIONS

1. Vote to approve the proposed policy presented below and publish it in the Memorandum to the Field.
2. Vote to approve the proposed policy with amendments shown below and publish it in the Memorandum to the Field:

#### **2-3-600 – REVIEW BOARD APPEAL PROCESS**

**2-3-602. Appointment of Members.** The Review Board of Appeals shall consist of a pool of fifteen (15) persons, all of whom have had experience in accreditation, who are appointed to three-year terms. A person appointed shall not have been a commissioner within one year of appointment. The Review Board of Appeals shall consist of at least two (2) academic representatives, two (2) administrative representatives, and three (3) public members, as defined in Appendix A.

A Review Board of Appeals panel of three to seven persons, depending on the scope and complexity of the matter or institution being reviewed, will be designated by the Council from the entire Review Board to hear an appeal from an institution. The Council also will designate one member of the Review Board Panel to serve as chair. The selection and actions of the panel are subject to ACICS conflict of interest policies. A Review Board Panel will consist of at least ~~one (1) public, one (1) administrative, and one (1) academic~~, one (1) administrative, and one (1) public representative as defined in Appendix A.

**2-3-608. Expenses of Appeal Hearing.** The institution shall bear the following expenses in connection with the appeal:

- (a) travel and subsistence of the Review Board panel members participating in the hearing; and
- (b) cost of the hearing room and transcription.

An appeals ~~fee deposit~~ must be remitted to ~~made with~~ the Council at the time of the filing of the notice of appeal described in Section 2-3-604. This ~~fee deposit~~ shall be applied to the expenses listed above, ~~and any excess deposit will be returned to the institution.~~

#### **APPENDIX A BYLAWS**

#### **ARTICLE VII Appeals Process**

*Section 1 – Review Board of Appeals.* A Review Board of Appeals shall be appointed by the Council. The purpose of the Review Board shall be to review, according to pre-established procedures and guidelines, appeals by members of final negative actions by the Council and in each case either to affirm the action of the Council, to remand the case to the Council for further review, or to amend or overturn the action. The Review Board shall consist of a pool of fifteen (15) persons, all of whom have had experience in accreditation. The Review Board shall include at least two (2) academic representatives, two (2) administrative representatives, and three (3) public members, as defined in Article III, Section 1 herein. Review Board panels will consist of a minimum of three (3) members and be comprised of at least ~~one (1) public~~, one (1) academic, ~~and one (1) administrative~~, and one (1) public representative. Members shall be appointed to terms of three years, with terms of initial appointees staggered so that one-third of the terms expire each year. A person appointed to the Review Board shall not have been a commissioner within one year prior to appointment. The President shall convene timely a panel of the Review Board when necessary.

3. Recommend a different approach to policy issue as stated below:
4. Remove from further consideration.

---

**RECOMMENDATION: Option 2**

**MOVED:** Commissioner Leak  
**SECONDED:** Commissioner Euliano  
**ABSTENTION:** none  
**ACTION:** Unanimously Passed

In relation to the above policy change, staff provided a list of 15 existing and potential members for the Review Board pool. The list contained an equal mix of persons identified as public, member, administrative, and academic. There was discussion regarding the appropriateness of the persons on the list.

Council asked that the staff clean up the list and bring a new list to the executive committee.

**VII. Institutional Grant Length Zeigler**

**COMMITTEE:** FC/April.2017/3  
**DATE:** April 2017  
**SUBJECT:** Institutional Grant Length  
**STAFF:** Karly Zeigler

---

**ISSUE:** Staff proposes a revision to once again determine grant lengths by institution, rather than by campus.

### **OVERVIEW**

In 2012 ACICS had added criterion to allow for individualized grant lengths at the campus level. However, since this revision was made, the necessity to consider grant lengths at the institutional level has become apparent due to varying factors of an institution that are often applicable to the main and its branches.

We currently have approximately 120 branch campuses which have a grant of accreditation expiring before or after the main campus, which would need to be reconciled. (See Main vs. Branch Expiration)

### **CRITERIA**

**2-1-701. *Maximum Length of Grants of Accreditation.*** The Council determines the grant lengths of each ~~campus-~~ institution that is accredited by ACICS. The maximum length of an initial grant of accreditation is three years. If an institution can demonstrate a record of having been in good standing with another institutional accrediting agency recognized by the United States Department of Education, the Council may award an initial grant of up to four years. The maximum length of a renewal grant of accreditation is six years.

**2-1-702. *Grant Lengths of Branch Campuses in Multiple Campus Institutions.*** ~~The Council at its discretion may determine that the grant length and/or expiration date for a branch campus will not coincide with the grant length and/or expiration date for the main campus. In the event that the main campus fails to maintain its accreditation status with ACICS, the associated branches and learning sites are ineligible for accreditation by ACICS.~~

### **OPTIONS**

1. Vote to approve the proposed policy presented below and publish it in the Memorandum to the Field.
2. Vote to approve the proposed policy with amendments shown below and publish it in the Memorandum to the Field:
3. Recommend a different approach to policy issue as stated below:
4. Remove from further consideration.

---

### **RECOMMENDATION: Option 1**

**MOVED:** Commissioner Ramirez-Rivera  
**SECONDED:** Commissioner Hobdy  
**ABSTENTION:** none  
**ACTION:** Unanimously Passed

Regarding the above policy item, staff asked Council to consider how to proceed with campuses that have different grant lengths from their main campuses. Staff Zeigler will prepare options for the Executive Committee's consideration.

### VIII. Establishment of Graduation Rate Standards

**DATE:** April 4, 2017  
**SUBJECT:** Establishment of Graduation Rate Standards  
**CONSIDERATION:** Proposed  
**STAFF:** Williams, Walters-Gilliam, & Gelfound

---

**Issue/Objective:** Using the scheduled-to-graduate cohort information collected on the 2016 Campus Accountability Report, the Council is now able to evaluate the spread of graduation outcomes reported by campuses, by program length, to consider the establishment of justifiable and reasonable graduation rate standards.

#### **The Graduation Rate Formula and Data Collection**

Instead of having campuses calculate and report their own rates, the CAR system requested the following information, by program and by student, with subsequent calculations initiated by cohort. Campuses were required to enter data on each student in the *schedule-to-graduate cohort*. With waiver withdrawals removed (active military service, enrollment at another campus within institution, incarceration, and death), we calculated graduation rate, e.g. total numbers of graduates divided by students enrolled in that cohort, as revised over the course of the conduct of the program.

#### **Assessment following data collection**

Institutions did not always understand the concept of scheduled-to-graduate (the date on the student's enrollment agreement or comparable document identifying the respective cohort audit trail). They often confused it with the actual graduation date (month/year) for each student.

#### **Analysis of the Data Collected**

Prior to considering the standards established by other comparable accrediting agencies, the data collected were analyzed using the following assumptions:

Because program lengths are not "standard", credential levels were used to establish the matrix to be used.

Graduate programs would be identified uniquely as graduate programs and not by program length.

1. Programs with a scheduled-to-graduate cohort of 10 or less were subtracted from the data to provide a more realistic review and eliminate extremes in the resulting percentiles.

**Table I: Summary of Graduation Rate Data from 2016 CAR**

Credential	Mean (AV)	Standard Deviation
Certificate	52%	29%
Certificate/Diploma	50%	25%
Occupational Associate's	57%	26%
Academic Associate's	55%	28%
Bachelor's degree	56%	33%
Master's degree	54%	31%

**Table II: Summary of Graduation Rate Data from 2017 Mid-Year CAR**

Credential	Mean (AV)	Standard Deviation
Certificate	52%	26%
Certificate/Diploma	49%	24%
Occupational Associate's	*	*
Academic Associate's	58%	24%
Bachelor's degree	*	*
Master's degree		

*\*Only one program was reported at this level on the mid-year*

**Table III: Summary of Comparisons with Other Agencies**

Program Length (in months)	Graduation Rate - Agency Comparison			
	ACCET	ABHES	ACCSC*	DEAC
1 – 3	67%	N/A	84%	
4 – 6	67%	N/A	69%	
7 – 9	67%	N/A	55%	
10 – 12	67%		54%	
13 – 15	67%		45%	
16 – 18	67%		42%	
19 – 24	**		36%	32%
25 – 35			33%	32%
36+			32%	32%
Bachelor's^				43%

*\*Referred to as the “benchmark” but would be our minimum compliance standard.*

*\*\*Agency does not offer this credential*

*^As differentiated by DEAC (credential versus lengths)*

### **Looking Ahead**

1. **Mid-Year CAR:** although not incorporated into this analysis, those campuses that were required to submit a mid-year Report also provided scheduled-to-graduate information and preliminary graduation rates were captured. Campuses are becoming more familiar with the “scheduled-to-graduate” information that they now need to collect (if they weren’t doing so previously).
2. **Implementation:** with the submission of the 2017 Campus Accountability Report.

### **Considerations for the Establishment of a Compliance Standard:**

While the mean across all programs’ lengths hovers between 50 – 56%, the large standard deviations indicate that the spread of data is much more varied and this variation must be taken into account when proposing a compliance point.

As summarized above, ACCET uses rate for all programs, regardless of length. ACCSC subtracted the standard deviation from the mean for each benchmark (as described in its *Accreditation Alert, June 29, 2012*). Although ABHES uses graduation rates as part of its assessment of outcomes, it is not used to take compliance actions at this time.

The benchmark of 70% already established for other student achievement outcomes – retention, placement, licensure examination pass rates – can also be applied to graduation rate.

### **Critical Questions:**

What should be the process for stabilizing the data given that only one year has been collected?

Should campuses be given a grace period prior to enforcement? (All reporting the first year)

1. Should the compliance point be a range, using a percentage above and below the mean?
2. As a starting point, should the Council considering benchmarking against a comparable agency while additional data are collected?

### **CRITERIA**

Once established, these standards will be incorporated into the guidelines of Appendix L. However, graduation rate has already been incorporated as a required element for the CEP (Section 3-1-111 & Appendix K).

Staff Gilliam proposed the policy to facilitate discussion on the topic as it had become a critical issue concerning ACICS’ compliance with ED’s expectations for student achievement. The Council discussed the establishment of a universal rate versus using rates based on the expected outcomes by credential levels. Further, consideration was given to the limitation of the data collected to date and how the outcomes already collected by comparable accrediting agencies could be incorporated in the development so far. After some discussion, Council tabled the issue and directed Staff to revise the policy for further consideration at the Friday Council meeting.

**IX. Review Board Decision: Remand Action**

The Review Board considered West Virginia Business College’s appeal of the December 22, 2017, decision to deny the institution’s application for renewal of accreditation. The Review Board determined that the institution did not have sufficient time to respond to the concerns. The Review Board remanded the decision to the Council with the recommendation that Council consider giving the institution additional time to address the remaining areas of noncompliance for review at the August 2017 Council meeting.

**MOTION:** As required by 2-3-603 of the *Accreditation Criteria*, the Council considered the recommendation of the Review Board but reaffirms its former decision to deny the institution’s application for renewal of accreditation.

**MOVED:** Swartzwelder

**SECONDED:** Hobdy

**ABSTENTION:** None

**ACTION:** Passed

**CLOSING**

Motion to adjourn at 12:30 p.m.

**MOTION:** Adjourn

**MOVED:** Leak

**ACCREDITING COUNCIL  
FOR  
INDEPENDENT COLLEGES AND SCHOOLS**

**OFFICIAL MINUTES OF THE MEETING OF THE COUNCIL**

ACICS OFFICE  
750 First Street, NE, Suite 980  
Washington, D.C. 20002

April 3-7, 2017

Thursday, April 6, 2017--Final

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**MEETING PARTICIPANTS**

**Commissioners**

Ms. Michelle Edwards, *Chair*  
Mr. Roger Swartzwelder, *Chair-Elect*  
Ms. Julie Blake, *Treasurer*  
Mr. John D. Euliano, *Secretary*  
Dr. Lawrence Leak, *Executive Committee Member*  
Dr. Edward Thomas  
Mr. Richard Bennett  
Dr. Fardad Fateri  
Ms. Elizabeth M. Guinan  
Dr. Adriene K. Hobdy  
Dr. Deborah Jones  
Ms. Martha E. Loveman  
Dr. Rafael Ramirez-Rivera  
Dr. Judee Timm

## **Staff**

Mr. Roger Williams, Interim President  
Ms. Corrisa Barker, Program Analyst  
Ms. Anne Bennett, Accreditation Coordinator  
Ms. Latoya Boyd, Accreditation Coordinator  
Ms. Jan Chambers, Accreditation Coordinator  
Mr. Quentin Dean, Senior Regulatory Affairs Coordinator  
Mr. Steven Gelfound, Vice President of Operations  
Ms. Trina Green, Senior Accounting Manager  
Dr. Terron King, Senior Manager, Institutional and Program Review  
Ms. Cathy Kouko, Accreditation Coordinator  
Ms. Linda Lundberg, Accreditation Content Editor  
Mr. Andre McDuffie, Senior Human Resources Coordinator  
Ms. Niana Moore, Accreditation Coordinator  
Ms. Katie Morrison, Accreditation Coordinator  
Ms. Andrea Reid, Assistant Manager, Administration  
Ms. Shaniqua Smith, Program Analyst I  
Mr. Maurice Wadlington, Senior Accreditation Coordinator  
Ms. Perliter Walters-Gilliam, Vice President of Accreditation  
Ms. Karly Zeigler, Manager of Institutional Compliance

## **CALL TO ORDER**

Chair Edwards called the meeting to order at 11:11 am.

## **SHOW-CAUSE REVIEW DECISIONS**

### **A. Globe University/Minnesota School of Business**

#### **Continued External Show-Cause Review (In Writing)**

*Globe University, Woodbury, MN –00010898 (Main)*

*Minnesota School of Business, Richfield, MN –00011103 (Main)*

**PRIMARY REVIEWER: RAMIREZ-RIVERA**

The panel considered the institution's current teach-out and closure plans that are underway with an anticipated final closure in October 2017. Staff has been requesting and will continue to request updated student audits to ensure that all students have been provided with an opportunity to complete or continue

**MOTION:** Continue the show-cause directive through final teach-out and closure of the institutions.

**MOVED:** Ramirez-Rivera

**SECONDED:** Bennett

**ABSTENTIONS:** None

**ACTION:** Passed

**B. Herguan University, Sunnyvale, CA – 00039183 (Main)  
Continued External Show-Cause Review (In Writing)**

PRIMARY REVIEWER: SWARTZWELDER

The panel discussed the institution's plans and ongoing legal battle with SEVIS. The institution indicated that it planned to target a new market of students, to include those already in the workforce that are looking to enhance their skills or previous Herguan University students that are currently employed under the H1B visa classification. However, no documentation of the implementation of this plan was provided other than a listing of 15 potentially interested students. No evidence of whether these potential students actually enrolled at the institution to support a new class start was provided for the Council's review. Hence, the concern remains for the viability of the institution relative to maintaining financial stability and its academic operations consistent with the *Accreditation Criteria*. The panel also recommended a special visit to the institution to evaluate the academic and operational activities as part of the continued show-cause action.

**MOTION:** Continue the show cause directive, requesting additional information and conducting a special visit to the institution.

**MOVED:** Leak

**SECONDED:** Jones

**ABSTENTIONS:** None

**ACTION:** Passed

**C. Northwest Suburban College, Rolling Meadows, IL – ACICS ID: 00135778 (Main)  
External Show-Cause Review (In Writing)**

PRIMARY REVIEWER: HOBODY

**MOTION:** Continue show cause and require campus to cease and desist unapproved programs within 15 days and will be considered at next executive committee meeting for future action.

**MOVED:** Hobdy

**SECONDED:** Fateri

**ABSTENTIONS:** None

**ACTION:** Passed

**D. MJS College School of Nursing and Business, Merrillville, IN – 00054467 (Main)  
Continued External Show-Cause Review (In Writing)**

PRIMARY REVIEWER: SWARTZWELDER

The institution voluntarily withdrew its accreditation so no action taken.

**E. Education Management Corporation**

**Continued Financial Show-Cause Review (In Writing)**

*The Art Institute of York - Pennsylvania, York, PA – ACICS ID: 00032159 (Main)*

*Art Institute of Fort Lauderdale, Fort Lauderdale, FL – ACICS ID: 00016231 (Main)*

*The Art Institutes International Minnesota, Minneapolis, MN – ACICS ID: 00010751 (Main)*

*Art Institute of Phoenix, Phoenix, AZ – ACICS ID: 00016228 (Main)*

*Art Institute of New York City, New York, NY – ACICS ID: 00016235 (Main)*

PRIMARY REVIEWER: SWARTZWELDER

The panel noted that the corporation was in the process of teaching out and closing three of the institutions (and their associated branches) but concerns still persisted with its continued financial stability.

**MOTION:** Continue financial show cause directive against EDMC and all its accredited institutions.

**MOVED:** Swartzwelder

**SECONDED:** Bennett

**ABSTENTIONS:** None

**ACTION:** Passed

**F. Bristol University, Anaheim, CA –00015728 (Main)**

**Continued Financial/Student Achievement Show-Cause Review (In Writing)**

PRIMARY REVIEWER: EULIANO

The panel considered the institution's response the financial issues and the student achievement deficiencies and determined that the institution adequately addressed the 34% retention rate it reported on its 2016 CAR. However, the panel continues to have serious concerns about the institution's continued viability and questioned the reliability of the financial data submitted in the institution's response, including a 116%% net loss, and equity as a percentage of total assets of 388%.

**MOTION:** Continue the financial show-cause directive.

**MOVED:** Euliano

**SECONDED:** Fateri

**ABSTENTIONS:** None

**ACTION:** Passed

**G. MDT College of Health and Sciences**

*MDT College of Health and Sciences, Inc., Highland Heights, OH – ACICS ID: 00016303 (Main)*

*MDT College of Health and Sciences, Inc., Dba ATS Institute of Technology, Chicago, IL – ACICS ID: 00101382 (Branch)*

PRIMARY REVIEWER: BLAKE

The panel determined that the institution addressed all the concerns related to the 43% placement rate reported by the main campus but, because the data was limited on the mid-year CAR (resulting in a 100% placement), is requesting that the institution submits a three-quarter 2017 CAR to better evaluate its student achievement in this reporting period. To that end, the student achievement show-cause directive was vacated but the institution placed on reporting.

Concerning the financial show-cause, the panel continues to have concerns with the financial stability of the institution although it recognized that improvements have already been made.

**MOTION:** Continue financial show cause, vacate student achievement show cause, and place on student achievement reporting.

**MOVED:** Blake

**SECONDED:** Guinan

**ABSTENTIONS:** None

**ACTION:** Passed

#### **H. SOLEX College**

##### **Continued On-Site Evaluation/Student Achievement Show-Cause Review (In Writing)**

*SOLEX College, Wheeling, IL – 00024422 (Main)*

*Wabash Learning Site, Chicago, IL – 00267203 (Learning Site)*

PRIMARY REVIEWER: SWARTZWELDER

The show-cause directive, initiated as a result of the institution's renewal of accreditation review, morphed to include student achievement concerns with its reported -3% placement rate on its 2016 CAR which called into question the integrity of the data. In its response, the institution addressed the -3% issue when it revised its 2016 CAR but as a result, another very critical issue surfaced. In the submitted mid-year 2017 CAR, the institution reported that its PTA program only had one remaining student and the MA program had 31 students who would complete or graduate before June 2017, with no new enrollees in either program. However, the Intensive English Program (IEP), which does not lead to a postsecondary academic credential, has over 200 students.

Further, the institution did not address the outstanding financial issue with the DOE concerning its response to the \$3, 750, 877.18 financial aid liabilities. The president provided a settlement proposal and email of acceptance from the USDE concerning a request to settle but a finalized settlement contract was not provided.

**MOTION:** Continue show-cause directive

**MOVED:** Euliano

**SECONDED:** Leak

**ABSTENTIONS:** None

ACTION: Passed

**I. Computer Systems Institute**

**Continued Student Achievement Show-Cause (On Remand)**

*Computer Systems Institute, Gurnee, IL – 00023493 (Main)*

*Computer Systems Institute, Skokie, IL – 00022181 (Branch)*

*Computer Systems Institute, Chicago, IL – 00023489 (Branch)*

*Computer Systems Institute, Elgin, IL – 00039798 (Branch)*

*Computer Systems Institute, Lombard, IL – 00023491 (Learning Site)*

*Computer Systems Institute, Charlestown, MA – 00231062 (Learning Site)*

*Computer Systems Institute, Worcester, MA – 00231063 (Learning Site)*

*Computer Systems Institute, Allston, MA – 00278094 (Learning Site)*

PRIMARY REVIEWER: SWARTZWELDER

Having considered the institution's response to the Student Achievement show-cause directive and noting that substantial improvement had not been made from its December 2016 review, the panel chronicled the institution's continued non-compliance with ACICS' standards since the initial show-cause directive was issued in February 2016. With the longest program being about a year, the institution has one year to come into compliance in accordance with Chapter 3, Introduction, unless if the Council has good cause to grant an extension.

The Council did not find good cause to extend the institution's maximum time frame.

**MOTION:** Withdraw the institution's accreditation by suspension, given that it exceeded the maximum time frame to bring itself into compliance since it was placed on show-cause in February 2016.

**MOVED:** Bennett

**SECONDED:** Swartzwelder

**ACTION:** Passed

**J. Branford Hall Career Institute, Branford CT – ACICS ID: 00010452 (Main)**

**Withdrawal by Suspension for Student Achievement**

*Branford Hall Career Institute, Branford, CT – 00010452(Main)*

*Branford Hall Career Institute, Southington, CT – 00015722(Branch)*

*Branford Hall Career Institute, Windsor, CT – 00012823 (Branch)*

*Branford Hall Career Institute, Springfield, MA – 00018785(Branch)*

*Branford Hall Career Institute, Woodland Park, NJ – 000255818(Branch)*

*Branford Hall Career Institute, Albany, NY – 00022387(Branch)*

*Branford Hall Career Institute, Bohemia, NY – 00019180(Branch)*

*Branford Hall Career Institute, Amityville, NY – 000178224 (Branch)*

*Branford Hall Career Institute, Windsor, CT – 00024281(Learning Site)*

*Branford Hall Career Institute, Springfield, MA – 00022439(Learning Site)*

PRIMARY REVIEWER: HOBODY

While the campus, in Branford, CT, where the placement performance has been below 60% for the past three years, reported a 58% rate on its mid-year 2017 CAR, it failed to provide the supporting documentation to demonstrate the improvement in outcomes, with many submitted placements to the PVP not yet verified by a graduate or employer.

**MOTION:** Rescind withdrawal by suspension action against the institution and issue a show cause directive to that campus

**MOVED:** Hobdy

**SECONDED:** Blake

**ABSTENTIONS:** None

**ACTION:** Passed

**K. Court Reporting Institute of St. Louis – ACICS ID: 00020271(Main)  
Withdrawal by Suspension for Student Achievement**

PRIMARY REVIEWER: HOBDY

Institution has closed so no action taken. At time of closure, the institution was under the adverse action.

**L. Gallipolis Career College, Gallipolis, OH – ACICS ID: 00011098 (Main)  
Withdrawal by Suspension for Student Achievement**

PRIMARY REVIEWER: HOBDY

The institution reported a 62% retention rate on its 2017 mid-year CAR, as a result of improvements in the two programs that had adversely impacted the campus-level rate in 2016.

**MOTION:** Rescind the withdrawal by suspension action and place the institution on student achievement reporting.

**MOVED:** Hobdy

**SECONDED:** Blake

**ABSTENTIONS:** None

**ACTION:** Passed

**M. Salter School, Fall River, MA– ACICS ID: 00020809 (Branch)  
Withdrawal by Suspension for Student Achievement**

PRIMARY REVIEWER: HOBDY

The panel noted that, as a result of the withdrawal by suspension action, the campus had initiated the closure process and was currently teaching out all its students with an anticipated

closure date of September 2016. As such, the panel recommended a rescission of the withdrawal action but wanted to keep the campus on show-cause through that teach-out, while monitoring the students' progress to completion and placement.

**MOTION:** Rescind withdrawal by suspension action and issue a show cause directive through the teach-out and closure of the campus, scheduled to be completed by September 2017.

**MOVED:** Hobdy

**SECONDED:** Blake

**ABSTENTIONS:** None

**ACTION:** Passed

**N. American College for Medical Careers, Orlando, FL – ACICS ID: 00171540 (Branch)  
Show-Cause Directive (Complaint Review)**

**PRIMARY REVIEWER:** EDWARDS

In its response, the campus satisfactorily addressed the seven (7) issues identified in the show cause letter, including the training of its staff, development and systematic implementation of policies and procedures, repair of the HVAC system, and addressing the ongoing concerns with campus security.

**MOTION:** Vacate show cause directive

**MOVED:** Edwards

**SECONDED:** Leak

**ABSTENTIONS:** None

**ACTION:** Passed

**CLOSING**

Motion to adjourn the meeting at 12:38 pm.

**MOTION:** adjourn

**MOVED:** Blake

**ACCREDITING COUNCIL  
FOR  
INDEPENDENT COLLEGES AND SCHOOLS**

**OFFICIAL MINUTES OF THE MEETING OF THE COUNCIL**

ACICS OFFICE  
750 First Street, NE, Suite 980  
Washington, D.C. 20002

April 3-7, 2017

Friday, April 7, 2017--FINAL

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## MEETING PARTICIPANTS

### **Commissioners**

Ms. Michelle Edwards, *Chair*  
Mr. Roger Swartzwelder, *Chair-Elect*  
Ms. Julie Blake, *Treasurer (absent)*  
Mr. John D. Euliano, *Secretary*  
Dr. Lawrence Leak, *Executive Committee Member*  
Dr. Edward Thomas  
Mr. Richard Bennett  
Dr. Fardad Fateri  
Ms. Elizabeth M. Guinan  
Dr. Adriene K. Hobdy  
Dr. Deborah Jones  
Ms. Martha E. Loveman  
Dr. Rafael Ramirez-Rivera  
Dr. Judee Timm

### **Staff**

Mr. Roger Williams, Interim President  
Ms. Corrisa Barker, Program Analyst  
Ms. Anne Bennett, Accreditation Coordinator  
Ms. Latoya Boyd, Accreditation Coordinator  
Ms. Jan Chambers, Accreditation Coordinator  
Mr. Quentin Dean, Senior Regulatory Affairs Coordinator  
Mr. Steven Gelfound, Vice President of Operations  
Ms. Trina Green, Senior Accounting Manager  
Dr. Terron King, Senior Manager, Institutional and Program Review  
Ms. Cathy Kouko, Accreditation Coordinator  
Ms. Linda Lundberg, Accreditation Content Editor  
Mr. Andre McDuffie, Senior Human Resources Coordinator  
Ms. Katie Morrison, Accreditation Coordinator  
Ms. Andrea Reid, Assistant Manager, Administration  
Ms. Shaniqua Smith, Program Analyst I  
Mr. Maurice Wadlington, Senior Accreditation Coordinator  
Ms. Perliter Walters-Gilliam, Vice President of Accreditation  
Ms. Karly Zeigler, Manager of Institutional Compliance

## CALL TO ORDER

Chair Edwards called the meeting to order at 9:01 am.

**STANDING COMMITTEE REPORTS**

**I. Financial Review Committee**

The Financial Review Committee report was presented to the Council by committee chair, Commissioner Euliano.

**MOTION:** Approve the minutes of the Financial Review Committee (with the exception of items for separate vote below)

**MOVED:** Euliano

**SECONDED:** Bennett

**ABSTENTIONS:** None

**ACTION:** Passed

**A. Coleman University, San Diego, CA (ACICS ID: 00010418)**

**MOTION:** Place on financial show cause

**MOVED:** Euliano

**SECONDED:** Leak

**ABSENTION:** Swartzwelder

**ACTION:** Passed

**B. Education Affiliates Corporate Ownership**

*Fortis Institute, Erie, PA, ACICS ID: 00010934*

*Fortis College, Orange Park, FL, ACICS ID: 00016005*

*Fortis College, Norfolk, VA, ACICS ID: 00010770*

**MOTION:** Place Education Affiliates (three mains and four branches) on financial show cause

**MOVED:** Euliano

**SECONDED:** Leak

**ABSENTIONS:** None

**ACTION:** Passed

**C. Pinchot University (00022447), Seattle, WA**

The institution has made no submission of its AFR or any other reports previously requested by the Council, including a response to the Compliance Warning action from the December meeting

**MOTION:** Revoke the accreditation of the institution for failing to submit its AFR.

**MOVED:** Euliano

**SECONDED:** Leak

**ABSTENTIONS:** None

**ACTION:** Passed

**II. Business Practices Committee**

The Business Practices Committee report was presented to the Council by committee chair, Commissioner Fateri who summarized the discussion and draft policy changes considered by the committee.

After extensive discussion on the implications of the Notification of Program Teach-Out (BPC/4.17/3) draft policy, the proposal was removed from current voting and tabled until the August meeting, with staff directed to do some more research to give considerations to other, more practical solutions.

**MOTION:** To approve the minutes of the Business Practices Committee and table the Notification of Program Teach-out Policy to August 2017.

**MOVED:** Fateri

**SECONDED:** Ramirez-Rivera

**ABSTENTIONS:** None

**ACTION:** Passed

**III. Institutional Effectiveness Committee**

The Institutional Effectiveness Committee report was presented to the Council by committee chair, Commissioner Jones.

Program-level show-cause, compliance warning, and reporting actions taken by the committee, for retention and placement were summarized along with the communication approved for those campuses who have already initiated the program teach-out process as a consequence of low student achievement outcomes.

As a result of a recommendation from the Committee, Staffs Gilliam and Gelfound conducted a short presentation on the Council's adoption of a quarterly CAR requirement for all institutions, emphasizing the value to the campuses and ACICS. Questions included when and how it can be implemented as well as the actions that would be taken as a result of the data collected. Staff assured the Council that the intent was to first gather data to conduct analyses on trends over time to determine what actions would be necessary, including training. A specific motion, separate from the acceptance of the meetings, was made concerning this item:

**MOTION:** Move forward with the development of the quarterly CAR requirement and allow staff to create an implementation plan to be presented at the next Executive Committee meeting.

**MOVED:** Leak

**SECONDED:** Ramirez-Rivera

**ABSTENTIONS:** None

**ACTION:** Passed

\*\*\*\*\*

**MOTION:** Approve the minutes of the Institutional Effectiveness Committee meeting

**MOVED:** Jones

**SECONDED:** Bennett

**ABSTENTIONS:** See Absentions List (for student achievement actions)

**ACTION:** Passed

#### **IV. Education Enhancement and Evaluation Committee**

The Education Enhancement and Evaluation Committee report was presented to the Council by committee chair, Commissioner Hobdy.

**MOTION:** Approve the minutes of the Education Enhancement and Evaluation Committee meeting.

**MOVED:** Hobdy

**SECONDED:** Thomas

**ABSTENTIONS:** None

**ACTION:** Passed

### **SHOW-CAUSE AND FILE REVIEW DECISIONS**

#### **V. Student Achievement Program Level**

A. Deny the appeals for the withdrawal of approval for 3 programs

**MOVED:** Edwards

**SECONDED:** Leak

**ABSTENTIONS:** See Abstentions List.

**ACTION:** Passed

B. Rescind the withdrawal of approval for nine programs

**MOTION:** affirm motion and place on various statuses

**MOVED:** Edwards

**SECONDED:** Leak

**ABSTENTIONS:** See Abstentions List.

**ACTION:** Passed

C. Continue show-cause directives for 15 programs

**MOVED:** Leak

**SECONDED:** Fateri

**ABSTENTIONS:** See Abstentions List.

**ACTION:** Passed

D. Vacate show-cause directive and place 5 programs on reporting

**MOVED:** Thomas

**SECONDED:** Swartzwelder

**ABSTENTIONS:** See Abstentions List.

**ACTION:** Passed

- E. Vacate show-cause directives for 15 programs

**MOVED:** Fateri

**SECONDED:** Ramirez-Rivera

**ABSTENTIONS:** See Abstentions List.

**ACTION:** Passed

- F. Vacate licensure show-cause directive 2 programs at Pioneer Pacific College

**MOVED:** Leak

**SECONDED:** Bennett

**ABSTENTIONS:** See Abstentions List.

**ACTION:** Passed

## **VI. File Review**

- A. Denial of Initial Grant - Florida Academy of Nursing, Miramar, FL (00270253)

The Council voiced concern that the institution would not be able to meet licensure pass rate requirements for ACICS (60%) nor the state of Florida (72%) having achieved rates of 45% (2016), 30.95% (2015), and 66.67% (2014) as published by the Florida Board of Nursing on its web site.

**MOTION:** To deny the institution's application for initial accreditation

**MOVED:** Loveman

**SECONDED:** Leak

**ACTION:** Passed

- B. Initial Grant Deferral—South Baylo University

*South Baylo University, Anaheim, CA (00230247) main*

*South Baylo University, Annandale, VA (00236409) branch*

Although the institution satisfactory addressed the findings identified as outstanding by the Council, ACICS received a copy of a show-cause directive issued by the institution's current accreditor, ACAOM, as a result of a formal "Accusation" from the Division of Consumer Affairs at the California Bureau of Private Postsecondary Education (BPPE).

**MOTION:** To defer an action on the institution's initial application and conduct an unannounced visit to evaluate the Accusations presented by the BPPE.

**MOVED:** Thomas

**SECONDED:** Ramirez-Rivera

**ACTION:** Passed

- C. Initial Grant Deferral—Two institutions

Agape College of Business and Science, Fresno, CA (00240200)

Si Tanka University, Sioux Falls, SD (276405)

**MOTION:** To defer action on the institutions' application for initial accreditation

**MOVED:** Leak

**SECONDED:** Bennett

**ACTION:** Passed

D. Initial Grant Approval--Healing Hands Institute, Miami, FL (00267207)

**MOTION:** Approve the application for initial accreditation for Healing Hands Institute for a 2-year period, through 2019.

**MOVED:** Leak

**SECONDED:** Euliano

**ABSTENTIONS:** See Abstentions List.

**ACTION:** Passed

E. Initial Grant Approval--BAU International University, Washington, DC (00275488)

**MOTION:** Approve the application for initial accreditation for BAU International University for a 3-year period, through 2020.

**MOVED:** Jones

**SECONDED:** Ramirez-Rivera

**ACTION:** Passed

F. Initial Grant Approval--American Institute of Healthcare & Technology, Stratford, CT (00259084)

G.

**MOTION:** Approve the application for initial accreditation for the American Institute of Healthcare & Technology for a 2-year period, through 2019.

**MOVED:** Ramirez-Rivera

**SECONDED:** Guinan

**ACTION:** Passed

H. Renewal of Accreditation Compliance Warning

**MOTION:** Place 9 campuses on compliance warning and continue compliance warning for Ridley-Lowell Business & Technical Inst., New London, CT

**MOVED:** Leak

**SECONDED:** Ramirez-Rivera

**ABSTENTIONS:** See Abstentions List.

**ACTION:** Passed

I. Renewal of Accreditation Deferrals

**MOTION:** Defer an action on the renewal of accreditation application for 5 campuses

**MOVED:** Fateri

**SECONDED:** Leak

**ABSTENTIONS:** See Abstentions List.

**ACTION:** Passed

J. Renewal of Accreditation Approvals

**MOTION:** Approve the applications for a renewal of accreditation for 20 campuses

**MOVED:** Leak

**SECONDED:** Ramirez-Rivera

**ABSTENTIONS:** See Abstentions List.

**ACTION:** Passed

K. Special Visits Compliance Warning

**MOTION:** Place 5 campuses on compliance warning

**MOVED:** Leak

**SECONDED:** Fateri

**ABSTENTIONS:** See Abstentions List.

**ACTION:** Passed

L. Special Visit Deferral--Gallipolis Career College, Gallipolis, OH (00011098)

**MOTION:** Defer action on the special visit report

**MOVED:** Leak

**SECONDED:** Fateri

**ABSTENTIONS:** See Abstentions List.

**ACTION:** Passed

M. Special Visit Approvals (23 campuses)

**MOTION:** Accept the visit reports for the special visits

**MOVED:** Leak

**SECONDED:** Bennett

**ABSTENTIONS:** See Abstentions List.

**ACTION:** Passed

N. QAM Visit Compliance Warning--Global Health College, Alexandria, VA (00023681)

**MOTION:** Place the institution on compliance warning for its quality assurance monitoring review

**MOVED:** Leak

**SECONDED:** Guinan

**ABSTENTIONS:** See Abstentions List.

**ACTION:** Passed

O. QAM Visit Approvals

**MOTION:** Approve the quality assurance monitoring reviews for 25 campuses

**MOVED:** Euliano

**SECONDED:** Leak

**ABSTENTIONS:** See Abstentions List.

**ACTION:** Passed

**OLD BUSINESS**

**VII. Intent to Debar Appeal Review (In Writing)**

President & other Board Members - MBTI Business Training Institute

Intent to Bar Five Board Members

Panel

Jones, Primary Reviewer

Timm, Panel member

Guinan, Panel member

Katie Morrison, staff liaison

LaToya Boyd, staff liaison

**MOTION:** To debar the five (5) board members for five (5) years effective at date of approval, April 7, 2017.

**MOVED:** Jones

**SECONDED:** Bennett

**ABSTENTION:** Ramirez-Rivera

**ACTION:** Passed

**VIII. Establishment of Graduation Rate Standards (Revised Policy Discussion Outline)**

**SUBJECT:** Establishment of Graduation Rate Standards

**CONSIDERATION:** Proposed

**STAFF:** Williams, Walters-Gilliam, and Gelfound

---

**ISSUE/OBJECTIVE:**

Using the scheduled-to-graduate cohort information collected on the 2016 Campus Accountability Report, the Council is now able to evaluate the spread of graduation outcomes reported by campuses, by program length, to consider the establishment of enforceable graduation rate standards.

*Should the Council then use established standards as a benchmark to begin its consideration of implementing a graduation rate compliance standard?*

**The Graduation Rate Formula and Data Collection**

Instead of having campuses calculate and report their own rates, the CAR system requested the following information, by program and by student, with subsequent calculations initiated by cohort. Campuses were required to enter data on each student in the *schedule-to-graduate cohort*. With waiver withdrawals removed (active military service, enrollment at another campus within institution, incarceration, and death), we calculated graduation rate, e.g. total numbers of

graduates divided by students enrolled in that cohort, as revised over the course of the conduct of the program.

**Assessment following data collection**

Institutions did not always understand the concept of scheduled-to-graduate (the date on the student’s enrollment agreement or comparable document identifying the respective cohort audit trail). They often confused it with the actual graduation date (month/year) for each student.

**Analysis of the Data Collected**

Prior to considering the standards established by other comparable accrediting agencies, the data collected were analyzed using the following assumptions:

1. Because program lengths are not “standard”, credential levels were used to establish the matrix to be used.
2. Graduate programs would be identified uniquely as graduate programs and not by program length.
3. Programs with a scheduled-to-graduate cohort of 10 or less were subtracted from the data to provide a more realistic review and eliminate extremes in the resulting percentiles.

**Table I: Summary of Graduation Rate Data from 2016 CAR**

Credential	Mean (AV)	Standard Deviation
Certificate	52%	29%
Certificate/Diploma	50%	25%
Occupational Associate’s	57%	26%
Academic Associate’s	55%	28%
Bachelor’s degree	56%	33%
Master’s degree	54%	31%

**Table II: Summary of Graduation Rate Data from 2017 Mid-Year CAR**

Credential	Mean (AV)	Standard Deviation
Certificate	52%	26%
Certificate/Diploma	49%	24%
Occupational Associate’s	*	*
Academic Associate’s	58%	24%
Bachelor’s degree	*	*
Master’s degree		

*\*Only one program was reported at this level on the mid-year*

**Table III: Summary of Comparisons with Other Agencies**

Program Length (in months)	Graduation Rate - Agency Comparison			
	ACCET	ABHES	ACCSC*	DEAC
1 – 3	67%	N/A	84%	
4 – 6	67%	N/A	69%	
7 – 9	67%	N/A	55%	
10 – 12	67%		54%	
13 – 15	67%		45%	
16 – 18	67%		42%	
19 – 24	**		36%	32%
25 – 35			33%	32%
36+			32%	32%
Bachelor's <sup>^</sup>				43%
Master's				54%

*\*Referred to as the “benchmark” but would be our minimum compliance standard.*

*\*\*Agency does not offer this credential*

*^As differentiated by DEAC (credential versus lengths)*

Looking Ahead

1. Mid-Year CAR: although not incorporated into this analysis, those campuses that were required to submit a mid-year Report also provided scheduled-to-graduate information and preliminary graduation rates were captured. Campuses are becoming more familiar with the “scheduled-to-graduate” information that they now need to collect (if they weren’t doing so previously).
2. Implementation: with the submission of the 2017 Campus Accountability Report.

Considerations for the Establishment of a Compliance Standard:

While the mean across all programs’ lengths hovers between 50 – 56%, the large standard deviations indicate that the spread of data is much more varied and this variation must be taken into account when proposing a compliance point.

As summarized above, ACCET uses rate for all programs, regardless of length. ACCSC subtracted the standard deviation from the mean for each benchmark (as described in its *Accreditation Alert, June 29, 2012*). Although ABHES uses graduation rates as part of its assessment of outcomes, it is not used to take compliance actions at this time.

The benchmark of 70% already established for other student achievement outcomes – retention, placement, licensure examination pass rates – can also be applied to graduation rate.

PROPOSED CHANGES:

1. Given that ACCSC is similar in scope and offering to ACICS, and given that the agency has a statistically sound and reliable process for collecting, analyzing and establishing its standards, ACICS should use this model to start.

2. ACICS will continue to collect graduation rate data along with program length information, for further development of data inventory to stabilize its graduation rate results.
3. Campuses will report graduation rate outcomes on the 2017 CAR which will be taken into consideration for review by the Council.

**CRITERIA**

Once established, these standards will be incorporated into the guidelines of Appendix L. However, graduation rate has already been incorporated as a required element for the CEP (Section 3-1-111 & Appendix K).

Options

1. Vote to approve as proposed and publish it in the Memorandum to the Field.
2. Vote to amend the policy and bring before the Council in August:
3. Recommend a different approach to policy issue as stated below:

Motion is discussion is moving forward and will be considered at the next available meeting

4. Remove from further consideration.

---

**RECOMMENDATION:**

**MOVED:** Commissioner Ramirez-Rivera moved to accept option 3 as proposed

**SECONDED:** Commissioner Thomas moved to second the motion

**ABSTENTION:** None

**AMMENDMENTS/GUIDANCE:** The Council directed staff to submit a summary of policy and chart to Executive Committee for communication to the membership via the memo to the field.

**CLOSING**

Motion to adjourn the April 2017 Council meeting at 1:30pm.

**MOVED:** Leak

**SECONDED:** Fateri

**ABSTENTIONS**

**FULL COUNCIL ABSTENTIONS**

**COMMITTEE A ABSTENTIONS**

**COMMITTEE B ABSTENTIONS**

**COMMITTEE C ABSTENTIONS**

**BOARD OF DIRECTORS**

April 2017 Minutes  
Monday, April 3, 2017, 10:00 a.m.  
FINAL

**BUSINESS PRACTICES COMMITTEE**

April 2017 Minutes  
Tuesday, April 4, 2017, 10:30 a.m.  
FINAL

**EDUCATION ENHANCEMENT AND EVALUATION COMMITTEE**

April 2017 Minutes  
Monday, April 3, 2017, 3:00 p.m.  
FINAL

**FINANCIAL REVIEW COMMITTEE**

April 2017 Minutes  
Wednesday, April 5, 2017, 3:00 p.m.  
FINAL

**INSTITUTIONAL EFFECTIVENESS COMMITTEE**

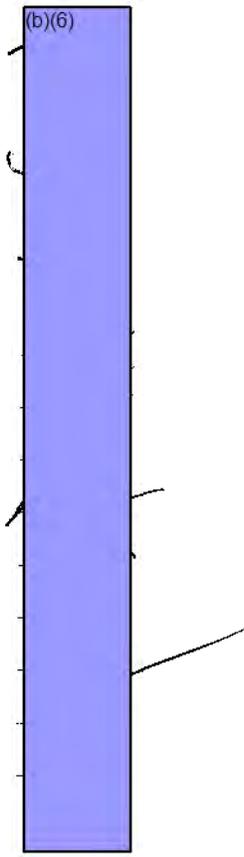
April 2017 Minutes  
Tuesday, April 4, 2017, 1:00 p.m.  
FINAL

***APRIL 2017 - FULL COUNCIL***

***ABSTENTIONS LIST***

*Please initial when you have reviewed this list. List should be returned to Karly when all have reviewed.*

- Commissioner Bennett*
- Commissioner Blake*
- Commissioner Edwards*
- Commissioner Euliano*
- Commissioner Fateri*
- Commissioner Guinan*
- Commissioner Hobby*
- Commissioner Jones*
- Commissioner Leak*
- Commissioner Loveman*
- Commissioner Ramirez-Rivera*
- Commissioner Swartzwelder*
- Commissioner Thomas*
- Commissioner Timm*



			RECUSED
Campus Name	ACICS ID	Class	Commissioner
Agape College of Business and Science, Fresno, CA	00240200	MAIN	
American Educational College, Vega Alta, PR	00020978	B	<i>RM</i>
American Institute of Healthcare & Technology, Stratford, CT	00259084	MAIN	
American National University, Florence, KY	00010154	B	
American National University, Pikeville, KY	00010725	B	
American National University, Pikeville, KY	00010725	B	
American National University, Richmond, KY	00010456	B	
American National University, South Bend, IN	00037761	B	
American University of Health Sciences, Signal Hill, CA	00020207	MAIN	
Art Institute of Indianapolis, Indianapolis, IN	00032160	B	
Art Institute of Las Vegas, Henderson, NV	00032209	B	
Art Institute of Las Vegas, Henderson, NV	00032209	B	
Art Institute of Las Vegas, Henderson, NV	00032209	B	
Art Institute of Phoenix, Phoenix, AZ	00016228	MAIN	
Art Institute of Salt Lake City, Draper, UT	00032150	B	
BAU International University, Washington, DC	00275488	MAIN	
Branford Hall Career Institute, Springfield, MA	00018785	B	
Brightwood College, Hammond, IN	00010363	MAIN	<i>RM</i>
Brown Mackie College - Akron, Akron, OH	00011239	B	
Brown Mackie College - Atlanta, Atlanta, GA	00020239	B	
Brown Mackie College - Cincinnati, Cincinnati, OH	00010572	B	
Brown Mackie College - Findlay, Findlay, OH	00010165	B	
Brown Mackie College - Fort Wayne, IN	00010218	B	
Brown Mackie College - Greenville, Greenville, SC	00024800	B	
Brown Mackie College - Indianapolis, Indianapolis, IN	00023533	B	
Brown Mackie College - Louisville, Louisville, KY	00020244	B	
Brown Mackie College - San Antonio, San Antonio, TX	00041546	B	
Brown Mackie College - South Bend, South Bend, IN	00010695	B	
Brown Mackie College - St. Louis, Fenton, MO	00029631	B	
Brown Mackie College - Tucson, Tucson, AZ	00011136	B	
Brown Mackie College - Tulsa, Tulsa, OK	00024239	B	
Bryan University, Los Angeles, CA	00011099	B	
Bryan University, Topeka, KS	00010128	MAIN	
California International Business University, San Diego, CA	00020292	MAIN	
California Miramar University, San Diego, CA	00024921	MAIN	
California University of Management and Sciences, Anaheim, CA	00021311	MAIN	
California University of Management and Sciences, Arlington, VA	00023818	MAIN	
Columbia College, Vienna, VA	00068978	MAIN	
Elmira Business Institute, Elmira, NY	00011107	MAIN	
Elmira Business Institute, Vestal, NY	00020757	B	
Empire College, Santa Rosa, CA	00010602	MAIN	
Everest College, Tacoma, WA	00020562	B	
Florida Academy of Nursing, Miramar, FL	00270253	MAIN	
Fortis Institute, Erie, PA	00010934	MAIN	
Gallipolis Career College, Gallipolis, OH	00011098	MAIN	

			RECUSED
Campus Name	ACICS ID	Class	Commissioner
Global Health College, Alexandria, VA	00036481	MAIN	
Gwinnett Institute, Orlando, FL	00269949	B	
Harris School of Business, Cherry Hill, NJ	00010547	MAIN	
Healing Hands Institute, Miami, FL	00267207	MAIN	
Hunter Business School, Levittown, NY	00010696	MAIN	
Hunter Business School, Medford, NY	00022604	B	
International Business College, Fort Wayne, IN	00011196	MAIN	
International College of Health Sciences, Boynton Beach, FL	00245831	MAIN	
International College of Health Sciences, Boynton Beach, FL	00245831	MAIN	
Laurel Technical Institute, Sharon, PA	00010838	MAIN	
Laurus College, Oxnard, CA	00060414	B	02
Laurus College, Oxnard, CA	00060414	B	02
Laurus College, Oxnard, CA	00060414	B	02
Laurus College, Oxnard, CA	00060414	B	02
Laurus College, Oxnard, CA	00060414	B	02
Laurus College, Oxnard, CA	00060414	B	02
Laurus College, San Luis Obispo, CA	00023501	MAIN	02
Laurus College, San Luis Obispo, CA	00023501	MAIN	02
Laurus College, San Luis Obispo, CA	00023501	MAIN	02
Laurus College, San Luis Obispo, CA	00023501	MAIN	02
Laurus College, San Luis Obispo, CA	00023501	MAIN	02
Laurus College, San Luis Obispo, CA	00023501	MAIN	02
McCann School of Business & Technology, Carlisle, PA	00029269	B	
McCann School of Business & Technology, Dickson City, PA	00020097	B	
Miami-Jacobs Career College, Dayton, OH	00010254	B	
Miami-Jacobs Career College, Springboro, OH	00022116	B	
Miami-Jacobs Career College, Troy, OH	00023417	B	
Miller-Motte Technical College, Gulfport, MS	00048170	B	
National College, Bartlett, TN	00023525	B	
New York Institute of English and Business, New York, NY	00011328	MAIN	
Niels Brock Copenhagen Business College, Copenhagen K, Denmark	00171290	MAIN	
Nobel University - Buena Park, Buena Park, CA	00240580	B	
Northwestern Polytechnic University, Fremont, CA	00015527	MAIN	
Northwestern Polytechnic University, Fremont, CA	00015527	MAIN	
Peloton College, Dallas, TX	00024852	MAIN	
Peloton College, Dallas, TX	00024852	MAIN	
Peloton College, Dallas, TX	00024852	MAIN	
PITC Institute, Wyncote, PA	00025097	MAIN	02
Redstone College - Denver East, Westminster, CO	00168008	B	
Redstone College, Broomfield, CO	00027075	MAIN	
Ridley-Lowell Business & Technical Inst., New London, CT	00011303	MAIN	
Ridley-Lowell Business & Technical Inst., New London, CT	00011303	MAIN	
Ridley-Lowell Business & Technical Institute, Danbury, CT	00033448	B	
Sentara College of Health Sciences, Chesapeake, VA	00024346	MAIN	

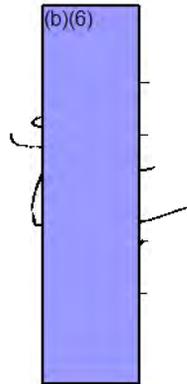
			RECUSED
Campus Name	ACICS ID	Class	Commissioner
Si Tanka University, Sioux Falls, SD	00276405	MAIN	
Silicon Valley University, San Jose, CA	00019408	MAIN	
South Baylo University - Virginia, Annandale, VA	00236409	B	
South Baylo University, Anaheim, CA	00230247	MAIN	
Stratford University, Falls Church, VA	00019411	MAIN	
Texas Health and Science University, Austin, TX	00103319	MAIN	
University of North America, Vienna, VA	00228584	MAIN	
Vet Tech Institute of Houston, Houston, TX	00010596	MAIN	
Virginia College, Lubbock, TX	00221316	B	<i>wt</i>

***APRIL 2017 - ABSTENTIONS LIST***

*Please initial when you have reviewed this list. List should be returned to Karly when all have reviewed.*

**COMMITTEE A**

- \*Commissioner Euliano*
- Commissioner Blake*
- Commissioner Edwards*
- Commissioner Leak*
- Commissioner Swartzwelder*



\*denotes Committee Chair

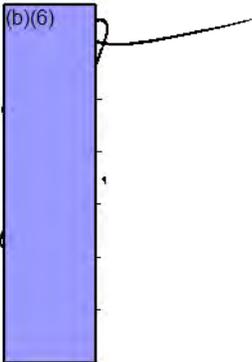


***APRIL 2017 - ABSTENTIONS LIST***

*Please initial when you have reviewed this list. List should be returned to Karly when all have reviewed.*

**COMMITTEE B**

- \*Commissioner Thomas*
- Commissioner Guinan*
- Commissioner Hobdy*
- Commissioner Jones*
- Commissioner Ramirez-Rivera*



\*denotes Committee Chair

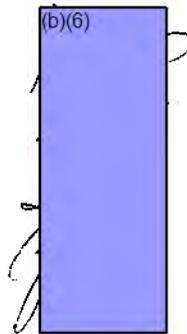
			RECUSED
Campus Name	ACICS ID	Class	Commissioner
American Institute of Healthcare & Technology, Stratford, CT	00259084	MAIN	
American National University, Florence, KY	00010154	B	
American National University, Pikeville, KY	00010725	B	
American National University, Pikeville, KY	00010725	B	
American National University, Richmond, KY	00010456	B	
American National University, South Bend, IN	00037761	B	
BAU International University, Washington, DC	00275488	MAIN	
California Miramar University, San Diego, CA	00024921	MAIN	
California University of Management and Sciences, Anaheim, CA	00021311	MAIN	
California University of Management and Sciences, Arlington, VA	00023818	MAIN	
Elmira Business Institute, Elmira, NY	00011107	MAIN	
Elmira Business Institute, Vestal, NY	00020757	B	
Empire College, Santa Rosa, CA	00010602	MAIN	
Everest College, Tacoma, WA	00020562	B	
Fortis Institute, Erie, PA	00010934	MAIN	
Gallipolis Career College, Gallipolis, OH	00011098	MAIN	
Global Health College, Alexandria, VA	00036481	MAIN	
Harris School of Business, Cherry Hill, NJ	00010547	MAIN	
Hunter Business School, Levittown, NY	00010696	MAIN	
Hunter Business School, Medford, NY	00022604	B	
McCann School of Business & Technology, Carlisle, PA	00029269	B	
McCann School of Business & Technology, Dickson City, PA	00020097	B	
Miami-Jacobs Career College, Dayton, OH	00010254	B	
Miami-Jacobs Career College, Springboro, OH	00022116	B	
Miami-Jacobs Career College, Troy, OH	00023417	B	
Miller-Motte Technical College, Gulfport, MS	00048170	B	
National College, Bartlett, TN	00023525	B	
Peloton College, Dallas, TX	00024852	MAIN	
Peloton College, Dallas, TX	00024852	MAIN	
Peloton College, Dallas, TX	00024852	MAIN	
PITC Institute, Wyncote, PA	00025097	MAIN	<i>DJA</i>
South Baylo University, Anaheim, CA	00230247	MAIN	
South Baylo University - Virginia, Annandale, VA	00236409	B	

## ***APRIL 2017 - ABSTENTIONS LIST***

*Please initial when you have reviewed this list. List should be returned to Karly when all have reviewed.*

### **COMMITTEE C**

*\*Commissioner Fateri  
Commissioner Bennett  
Commissioner Loveman  
Commissioner Timm*



\*denotes Committee Chair

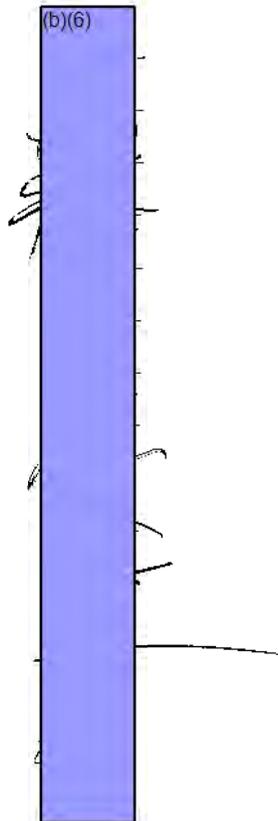
RECUSED			
Campus Name	ACICS ID	Class	Commissioner
American Educational College, Vegas Alta, PR	00020978	B	
American University of Health Sciences, Signal Hill, CA	00020207	MAIN	
Brown Mackie College - Akron, Akron, OH	00011239	B	
Brown Mackie College - Atlanta, Atlanta, GA	00020239	B	
Brown Mackie College - Cincinnati, Cincinnati, OH	00010572	B	
Brown Mackie College - Findlay, Findlay, OH	00010165	B	
Brown Mackie College - Fort Wayne, IN	00010218	B	
Brown Mackie College - Greenville, Greenville, SC	00024800	B	
Brown Mackie College - Indianapolis, Indianapolis, IN	00023533	B	
Brown Mackie College - Louisville, Louisville, KY	00020244	B	
Brown Mackie College - San Antonio, San Antonio, TX	00041546	B	
Brown Mackie College - South Bend, South Bend, IN	00010695	B	
Brown Mackie College - St. Louis, Fenton, MO	00029631	B	
Brown Mackie College - Tucson, Tucson, AZ	00011136	B	
Brown Mackie College - Tulsa, Tulsa, OK	00024239	B	
Bryan University, Los Angeles, CA	00011099	B	
Bryan University, Topeka, KS	00010128	MAIN	
California International Business University, San Diego, CA	00020292	MAIN	
Columbia College, Vienna, VA	00068978	MAIN	
Florida Academy of Nursing, Miramar, FL	00270253	MAIN	
International Business College, Fort Wayne, IN	00011196	MAIN	
International College of Health Sciences, Boynton Beach, FL	00245831	MAIN	
International College of Health Sciences, Boynton Beach, FL	00245831	MAIN	
New York Institute of English and Business, New York, NY	00011328	MAIN	
Nobel University - Buena Park, Buena Park, CA	00240580	B	
Redstone College, Broomfield, CO	00027075	MAIN	
Redstone College - Denver East, Westminster, CO	00168008	B	
Sentara College of Health Sciences, Chesapeake, VA	00024346	MAIN	
Si Tanka University, Sioux Falls, SD	00276405	MAIN	
Stratford University, Falls Church, VA	00019411	MAIN	
Texas Health and Science University, Austin, TX	00103319	MAIN	
Virginia College, Lubbock, TX	00221316	B	

**DECEMBER 2016, FEBRUARY 2017, APRIL 2017 - STUDENT  
ACHIEVEMENT ACTIONS**

**ABSTENTIONS LIST**

*Please initial when you have reviewed this list. List should be returned to Karly when all have reviewed.*

- Commissioner Bennett*
- Commissioner Blake*
- Commissioner Edwards*
- Commissioner Euliano*
- Commissioner Fateri*
- Commissioner Guinan*
- Commissioner Hobby*
- Commissioner Jones*
- Commissioner Leak*
- Commissioner Loveman*
- Commissioner Ramirez-Rivera*
- Commissioner Swartzwelder*
- Commissioner Thomas*
- Commissioner Timm*



00010400	Academy College	Bloomington	MN	
00171540	American College For Medical Careers	Orlando	FL	
00050228	American College of Commerce and	Falls Church	VA	(b)(6)
00016220	American Educational College	Toa Alta	PR	
00020978	American Educational College	Vega Alta	PR	
00010493	American Educational College	Bayamon	PR	
00010428	American Institute	West Hartford	CT	
00207625	American Institute	Toms River	NJ	
00022769	American Institute	Clifton	NJ	
00010422	American National University	Martinsville	VA	
00011176	American National University	Danville	VA	
00010278	American National University	Salem	VA	
00011138	American National University	Princeton	WV	
00037761	American National University	South Bend	IN	
00011238	American National University	Lexington	KY	
00010250	American National University	Louisville	KY	
00010147	American National University	Danville	KY	
00010947	American National University	Lynchburg	VA	
00023466	American National University	Youngstown	OH	
00011121	American National University	Harrisonburg	VA	
00011184	American National University	Charlottesville	VA	
00010725	American National University	Pikeville	KY	
00049448	American National University	Parkersburg	WV	
00010154	American National University	Florence	KY	
00109005	American University In Bosnia and Herzegovina	Tuzla		
00016231	Art Institute of Fort Lauderdale	Fort Lauderdale	FL	
00032160	Art Institute of Indianapolis	Indianapolis	IN	
00032209	Art Institute of Las Vegas	Henderson	NV	
00016228	Art Institute of Phoenix	Phoenix	AZ	
00032150	Art Institute of Salt Lake City	Draper	UT	
00010811	Atlantic University College	Guaynabo	PR	
00011208	Beal College	Bangor	ME	
00010123	Beckfield College	Florence	KY	
00024280	Beckfield College	Springdale	OH	
00023888	Bergin University of Canine Studies	Rohnert Park	CA	
00114473	Berks Technical Institute	Wyomissing	PA	
00021958	Bolivar Technical College	Bolivar	MO	
00010550	Bradford School	Columbus	OH	
00010509	Bradford School	Pittsburgh	PA	
00018785	Branford Hall Career Institute	Springfield	MA	
00012823	Branford Hall Career Institute	Windsor	CT	
00022387	Branford Hall Career Institute	Albany	NY	
00019180	Branford Hall Career Institute	Bohemia	NY	
00010452	Branford Hall Career Institute	Branford	CT	
00015722	Branford Hall Career Institute	Southington	CT	
00178224	Branford Hall Career Institute	Amityville	NY	
00010863	Brightwood Career Institute	Philadelphia	PA	(b)(6)
00011256	Brightwood Career Institute	Pittsburgh	PA	

00011179	Brightwood Career Institute	Harrisburg	PA	(b)(6)
00235508	Brightwood College	Baltimore	MD	
00170956	Brightwood College	Brownsville	TX	
00235912	Brightwood College	Dayton	OH	
00011298	Brightwood College	Sacramento	CA	
00171025	Brightwood College	McAllen	TX	
00171031	Brightwood College	North Hollywood	CA	
00171010	Brightwood College	San Antonio	TX	
00223659	Brightwood College	Beltsville	MD	
00170989	Brightwood College	Corpus Christi	TX	
00010164	Brightwood College	Houston	TX	
00170998	Brightwood College	El Paso	TX	
00173481	Brightwood College	San Diego	CA	
00173484	Brightwood College	San Antonio	TX	
00016302	Brightwood College	Friendswood	TX	
00021867	Brightwood College	Bakersfield	CA	
00180852	Brightwood College	Indianapolis	IN	
00171007	Brightwood College	Clovis	CA	
00010363	Brightwood College	Hammond	IN	
00171001	Brightwood College	Fort Worth	TX	(b)(6)
00015728	Bristol University	Anaheim	CA	
00038078	Broadview Entertainment Arts University	Salt Lake City	UT	
00027446	Broadview University-West Jordan	West Jordan	UT	
00012767	Brookline College	Tucson	AZ	
00020269	Brookline College	Albuquerque	NM	
00010976	Brookline College	Phoenix	AZ	
00020239	Brown Mackie College - Atlanta	Atlanta	GA	
00023969	Brown Mackie College - Boise	Boise	ID	
00010572	Brown Mackie College - Cincinnati	Cincinnati	OH	
00010165	Brown Mackie College - Findlay	Findlay	OH	
00010218	Brown Mackie College - Fort Wayne	Fort Wayne	IN	
00020248	Brown Mackie College - Hopkinsville	Hopkinsville	KY	
00023533	Brown Mackie College - Indianapolis	Indianapolis	IN	
00020244	Brown Mackie College - Louisville	Louisville	KY	
00021677	Brown Mackie College - Miami	Miramar	FL	
00020242	Brown Mackie College - North Canton	Canton	OH	
00024522	Brown Mackie College - Phoenix	Phoenix	AZ	
00011295	Brown Mackie College - Quad Cities	Bettendorf	IA	
00041546	Brown Mackie College - San Antonio	San Antonio	TX	
00010695	Brown Mackie College - South Bend	South Bend	IN	
00029631	Brown Mackie College - St. Louis	Fenton	MO	
00011136	Brown Mackie College - Tucson	Tucson	AZ	
00024239	Brown Mackie College - Tulsa	Tulsa	OK	
00031313	Brown Mackie College-Albuquerque	Albuquerque	NM	
00045407	Bryan University	Columbia	MO	
00010722	Bryan University	Springfield	MO	
00146787	Bryan University	Tempe	AZ	
00023162	Bryan University	Rogers	AR	
00011099	Bryan University	Los Angeles	CA	
00010128	Bryan University	Topeka	KS	

00149159	California Miramar University-Kenya	Nairobi		
00023818	California University of Management and Sciences	Arlington	VA	
00021311	California University of Management and Sciences	Anaheim	CA	
00020356	Cambridge Junior College	Yuba City	CA	
00011311	Camelot College	Baton Rouge	LA	
00010858	Charter College	Anchorage	AK	(b)(6)
00024798	Charter College - Oxnard	Oxnard	CA	
00024581	Charter College - Pasco Washington	Pasco	WA	
00035142	Charter College - Vancouver	Vancouver	WA	
00180313	Charter College, Fife, WA	Fife	WA	
00010544	Cheryl Fell's School of Business	Niagara Falls	NY	
00015801	City College	Altamonte Springs	FL	
00015624	City College	Miami	FL	
00010951	City College	Gainesville	FL	
00070469	City College	Hollywood	FL	
00010786	City College	Fort Lauderdale	FL	
00024768	Clary Sage College	Tulsa	OK	
00010253	Colegio Tecnologico y Comercial de PR	Aguada	PR	
00010418	Coleman University	San Diego	CA	
00024493	College of Business & Technology	Cutler Bay	FL	
00177353	College of Business & Technology	Miami Gardens	FL	
00022322	College of Business & Technology	Miami	FL	
00010864	College of Court Reporting	Valparaiso	IN	
00068978	Columbia College	Vienna	VA	
00024765	Community Care College	Tulsa	OK	
00022181	Computer Systems Institute	Skokie	IL	
00023489	Computer Systems Institute	Chicago	IL	
00023493	Computer Systems Institute	Gurnee	IL	
00039798	Computer Systems Institute	Elgin	IL	
00011153	Consolidated School of Business	Lancaster	PA	
00010680	Consolidated School of Business	York	PA	
00011305	Daymar College	Bowling Green	KY	
00010251	Daymar College	Nashville	TN	
00020977	Daymar College	Murfreesboro	TN	
00010142	Daymar College	Columbus	OH	
00011217	Daymar College	Clarksville	TN	
00010628	Detroit Business Institute-Downriver	Riverview	MI	
00015899	Dewey University- Bayamon Campus	Bayamon	PR	PTL ↓
00015637	Dewey University- Carolina Campus	Carolina	PR	
00022018	Dewey University- Farjardo Campus	Fajardo	PR	
00010091	Dewey University- Hato Rey Campus	Hato Rey	PR	
00021863	Dewey University- Juana Diaz Campus	Juana Diaz	PR	
00024810	Dewey University- Manati Campus	Manati	PR	
00240788	Dewey University Mayaguez	Mayaguez	PR	
00021648	Digital Media Arts College	Boca Raton	FL	
00011322	Dorsey School of Business	Wayne	MI	
00011210	Dorsey School of Business	Roseville	MI	
00011102	Dorsey School of Business	Southgate	MI	
00234674	Dorsey School of Business	Detroit	MI	

00010763	Dorsey School of Business	Madison Heights	MI	
00042275	Dorsey School of Business, Saginaw	Saginaw	MI	
00026874	Dorsey School of Business, Waterford/Pontiac	Pontiac	MI	
00010612	Douglas Education Center	Monessen	PA	
00010469	Duluth Business University	Duluth	MN	
00011200	Eagle Gate College	Murray	UT	
00021444	Eagle Gate College	Layton	UT	(b)(6)
00225143	East West College of Natural Medicine	Sarasota	FL	
00010388	Eastwick College	Ramsey	NJ	
00011227	Eastwick College	Hackensack	NJ	
00036670	Ecotech Institute	Aurora	CO	(b)(6)
00010190	EDIC College	Caguas	PR	
00242406	EDIC College	Carolina	PR	
00021281	EDP School of Computer Programming	Brooklyn	NY	
00011107	Elmira Business Institute	Elmira	NY	
00020757	Elmira Business Institute	Vestal	NY	
00010219	Everest College	Colorado Springs	CO	
00011333	Everest College	Henderson	NV	
00036352	Everest College	Fort Worth	TX	
00020553	Everest College	Dallas	TX	
00147010	Everest College	Woodbridge	VA	
00011101	Everest College	Thornton	CO	
00020754	Everest College	Arlington	TX	(b)(6)
00020562	Everest College	Tacoma	WA	
00010407	Everest College	Everett	WA	(b)(6)
00016100	Everest College	Chesapeake	VA	
00024726	Everest Institute - Tigard	Tigard	OR	
00018879	Everest University	Jacksonville	FL	
00010101	Everest University - Brandon	Tampa	FL	
00012379	Everest University - Melbourne	Melbourne	FL	
00020976	Everest University - Orange Park	Orange Park	FL	
00010126	Everest University - Pompano Beach	Pompano Beach	FL	
00010604	Everest University - South Orlando	Orlando	FL	
00011334	Everest University - Tampa	Tampa	FL	
00044818	Felbry College - School of Nursing	Columbus	OH	
00022169	Florida Career College	Lauderdale Lakes	FL	
00149752	Florida Career College	Orlando	FL	
00029287	Florida Career College - Boynton Beach	Boynton Beach	FL	
00020983	Florida Career College - Hialeah	Hialeah	FL	
00234383	Florida Career College - Houston	Houston	TX	
00024590	Florida Career College - Jacksonville	Jacksonville	FL	
00041942	Florida Career College - Margate	Margate	FL	
00011150	Florida Career College - Miami	Miami	FL	
00018781	Florida Career College - Pembroke	Pembroke Pines	FL	
00024396	Florida Career College - Riverview	Tampa	FL	
00020325	Florida Career College - West Palm Beach	West Palm Beach	FL	
00015693	Florida Technical College	Deland	FL	
00011286	Florida Technical College	Orlando	FL	
00010598	Florida Technical College	Lakeland	FL	

00049470	Florida Technical College	Kissimmee	FL	
00070801	Florida Technical College	Pembroke Pines	FL	
00010770	Fortis College	Norfolk	VA	
00016005	Fortis College	Orange Park	FL	
00023520	Fortis College	Landover	MD	
00011124	Fortis College	Richmond	VA	
00010414	Fortis College	Ravenna	OH	
00010934	Fortis Institute	Erie	PA	
00023927	Fortis Institute	Birmingham	AL	
00011098	Gallipolis Career College	Gallipolis	OH	
00010533	Gem City College	Quincy	IL	
00036481	Global Health College	Alexandria	VA	
00010898	Globe University	Woodbury	MN	
00225702	Guglielmo Marconi University	Rome	Rome	
00011909	Gwinnett College	Lilburn	GA	
00269949	Gwinnett Institute	Orlando	FL	
00010547	Harris School of Business	Cherry Hill	NJ	
00023260	Harris School of Business	Hamilton	NJ	
00044871	Harris School of Business	Upper Darby	PA	
00022418	Harris School of Business	Linwood	NJ	
00231204	Harris School of Business	Danbury	CT	
00255005	Harris-Casel Institute	Melbourne	FL	
00234214	Hondros College of Business	Westerville	OH	
00012815	Hondros College of Nursing	Fairborn	OH	
00048971	Hondros College of Nursing	Independence	OH	
00010429	Hondros College of Nursing	Westerville	OH	
00024783	Hondros College of Nursing	West Chester	OH	
00238949	Hope College of Arts & Sciences	Pompano Beach	FL	
00238527	Houston Training and Education Center	Houtston	TX	(b)(6)
00011123	Humacao Community College	Humacao	PR	
00022604	Hunter Business School	Medford	NY	
00021776	IBMC College	Cheyenne	WY	
00012706	IBMC College	Fort Collins	CO	
00268479	IBMC College	Colorado Springs	CO	
00023835	IBMC College	Greeley	CO	
00042287	IBMC College	Longmont	CO	
00051218	Iglobal University	Vienna	VA	
00010355	Instituto de Banca y Comercio	Hato Rey	PR	(b)(6)
00010460	Instituto de Banca y Comercio	Guayama	PR	
00018827	Instituto de Banca y Comercio	Caguas	PR	
00011144	Instituto de Banca y Comercio	Fajardo	PR	
00011162	Instituto de Banca y Comercio	Mayaguez	PR	
00033225	Instituto de Banca y Comercio	Bayamon	PR	
00015652	Instituto de Banca y Comercio	Moca	PR	
00051200	Instituto de Banca y Comercio	Yauco	PR	
00011159	Instituto de Banca y Comercio	Ponce	PR	
00022415	Instituto de Banca y Comercio	Aguadilla	PR	
00010922	Instituto de Banca y Comercio	Manati	PR	
00022990	Instituto de Banca y Comercio	Arecibo	PR	
00021183	Instituto de Banca y Comercio	Humacao	PR	

00237359	Instituto de Banca y Comercio, Los Colobos	Carolina	PR	(b)(6)
00024698	Instituto de Banca y Comercio-Escorial	San Juan	PR	
00011196	International Business College	Fort Wayne	IN	
00011199	International Business College	Indianapolis	IN	
00022465	Jose Maria Vargas University	Pembroke Pines	FL	
00010191	King's College	Charlotte	NC	
00108660	Kingston University	Norwalk	CA	
00010663	Lansdale School of Business	North Wales	PA	
00010641	Laurel Technical Institute	Meadville	PA	
00010838	Laurel Technical Institute	Sharon	PA	
00023501	Laurus College	San Luis Obispo	CA	(b)(6)
00048705	Le Cordon Bleu College of Culinary Arts Scottsdale	Scottsdale	AZ	
00019351	Lincoln College of Technology	Marietta	GA	
00020180	Lincoln College of Technology	West Palm Beach	FL	
00012781	Lincoln Technical Institute	Somerville	MA	
00015671	Lincoln Technical Institute	Paramus	NJ	
00019398	Lincoln Technical Institute	Lowell	MA	
00019357	Lincoln Technical Institute	Philadelphia	PA	
00011304	Lincoln Technical Institute	Moorestown	NJ	
00012783	Lincoln Technical Institute	Brockton	MA	
00010950	Lincoln Technical Institute	Iselin	NJ	
00012784	Lincoln Technical Institute	Lincoln	RI	
00023814	Living Arts College @ School of Communication Arts	Raleigh	NC	
00033024	Living Arts Institute @ School of Communication Arts	Winston Salem	NC	
00019325	Long Island Business Institute	Flushing	NY	
00012511	Manhattan School of Computer Technology	Brooklyn	NY	
00108012	McCann School of Business & Technology	Wilkes Barre	PA	
00010936	McCann School of Business & Technology	Hazle Township	PA	
00024762	McCann School of Business & Technology	Allentown	PA	
00015773	McCann School of Business & Technology	Lewisburg	PA	
00011194	McCann School of Business & Technology	Pottsville	PA	
00045494	McCann School of Business and Technology	Monroe	LA	
00045500	McCann School of Business and Technology	Shreveport	LA	
00101382	MDT College of Health Sciences, Inc, Db a ATS Institute of Technology	Chicago	IL	
00016303	MDT College of Health Sciences, Inc.	Highland Heights	OH	
00010341	Metro Business College	Jefferson City	MO	
00010937	Metro Business College	Rolla	MO	
00011253	Miami-Jacobs Career College	Columbus	OH	

00011226	Mildred Elley	Albany	NY	
00010857	Mildred Elley	Pittsfield	MA	
00032898	Mildred Elley-New York City	New York	NY	
00029110	Miller-Motte College	Fayetteville	NC	
00024664	Miller-Motte College	Greenville	NC	
00037877	Miller-Motte College	Jacksonville	NC	
00024128	Miller-Motte College	Raleigh	NC	
00010233	Miller-Motte College	Wilmington	NC	
00021570	Miller-Motte College	Cary	NC	
00046600	Miller-Motte Technical College	Macon	GA	
00010911	Miller-Motte Technical College	Clarksville	TN	
00042187	Miller-Motte Technical College	Augusta	GA	
00043616	Miller-Motte Technical College	Roanoke	VA	
00019077	Miller-Motte Technical College	Charleston	SC	
00031484	Miller-Motte Technical College	Columbus	GA	
00020286	Miller-Motte Technical College	Chattanooga	TN	
00010317	Miller-Motte Technical College	Lynchburg	VA	
00035150	Miller-Motte Technical College	Conway	SC	
00011220	Mountain State College	Parkersburg	WV	
00022603	National College	Memphis	TN	
00010139	National College	Bristol	TN	
00023525	National College	Bartlett	TN	
00011328	New York Institute of English and Business	New York	NY	
00031581	North American University	Stafford	TX	
00015527	Northwestern Polytechnic University	Fremont	CA	
00011181	Ohio Business College	Sandusky	OH	
00010662	Ohio Business College	Sheffield Village	OH	
00146976	Ohio Medical Career College	Dayton	OH	
00024769	Oklahoma Technical College	Tulsa	OK	
00237211	Pacific Institute of Technology	Morrow	GA	
00024852	Peloton College	Dallas	TX	
00010315	Penn Commercial Business/Technical School	Washington	PA	
00042957	Pinnacle Career Institute	Kansas City	MO	
00042939	Pinnacle Career Institute - North Kansas City	Kansas City	MO	
00108807	Pinnacle Career Institute - Online Education	Kansas City	MO	
00012651	Pioneer Pacific College	Wilsonville	OR	
00020227	Pioneer Pacific College - Eugene Branch	Springfield	OR	(b)(6)
00025097	PITC Institute	Wyncote	PA	
00070534	Pittsburgh Career Institute	Pittsburgh	PA	
00066575	PPG Technical College	Caguas	PR	
00053102	Provo College	Provo	UT	
00011303	Ridley-Lowell Business & Technical Inst.	New London	CT	
00015747	Ridley-Lowell Business & Technical Institute	Poughkeepsie	NY	
00033448	Ridley-Lowell Business & Technical Institute	Danbury	CT	

00243134	Ridley-Lowell Business & Technical Institute	West Warwick	RI	
00011332	Ridley-Lowell Business & Technical Institute	Binghamton	NY	
00031682	SAE Institute Atlanta	Atlanta	GA	
00245683	SAE Institute of Technology	New York	NY	
00032108	SAE Institute of Technology	North Miami Beach	FL	
00028284	SAE Institute of Technology	Los Angeles	CA	
00108398	SAE Institute of Technology - San Francisco	Emeryville	CA	
00042959	Salter College	Chicopee	MA	
00020809	Salter College	Fall River	MA	
00010357	Salter College: A Private Two-Year College, LLC	West Boylston	MA	
00019993	Salter School	Malden	MA	
00032544	Salter School of Nursing & Allied Health	Manchester	NH	
00021012	Sanford-Brown College	Henderson	NV	
00021569	Sanford-Brown College	Seattle	WA	
00024743	Sanford-Brown College Online	Tampa	FL	
00011132	Sanford-Brown College-Chicago	Chicago	IL	
00023802	Santa Barbara Business College	Rancho Mirage	CA	
00010730	Santa Barbara Business College	Bakersfield	CA	
00010731	Santa Barbara Business College	Santa Maria	CA	
00024027	Santa Barbara Business College - Online	Ventura	CA	
00010647	Schiller International University	Largo	FL	
00010639	Schiller International University	Heidelberg		
00010644	Schiller International University	Madrid		
00019408	Silicon Valley University	San Jose	CA	
00024422	SOLEX College	Wheeling	IL	
00010814	South Hills School of Business and Technology	State College	PA	(b)(6)
00020720	Southern Technical College	Orlando	FL	
00010657	Southern Technical College	Fort Myers	FL	
00018863	Southern Technical College	Tampa	FL	
00024504	Southern Technical College	Port Charlotte	FL	
00023740	Southern Technical College -	Auburndale	FL	
00024405	Southern Technical College - Mount Dora	Mount Dora	FL	
00040946	Southern Technical College, Brandon	Brandon	FL	
00024210	Southern Technical College-Sanford	Sanford	FL	
00010506	Spencerian College	Louisville	KY	
00015661	Spencerian College	Lexington	KY	
00022120	Stautzenberger College	Brecksville	OH	
00011980	Stautzenberger College	Maumee	OH	
00010552	Stevens - The Institute of Business and Arts	Saint Louis	MO	
00019411	Stratford University	Falls Church	VA	
00019413	Stratford University	Woodbridge	VA	
00135520	Stratford University	Newport News	VA	
00239628	Stratford University - Alexandria Campus	Alexandria	VA	

00039666	Stratford University - Glen Allen	Glen Allen	VA	
00230405	Stratford University - Virginia Beach	Virginia Beach	VA	
00108252	Stratford University Baltimore Campus	Baltimore	MD	
00015803	Sullivan College of Technology and Design	Louisville	KY	
00257970	Suncoast College of Health	Bradenton	FL	
00103319	Texas Health and Science University	Austin	TX	
00020240	The Art Institute of Tucson	Tucson	AZ	
00041675	The Art Institute of Wisconsin	Milwaukee	WI	
00010751	The Art Institutes International Minnesota	Minneapolis	MN	
00031491	The Digital Animation & Visual Effects School	Orlando	FL	
00028864	Tribeca Flashpoint College	Chicago	IL	
00170656	Trillium College Kingston	Kingston	Ontario	
00010408	Trinity College of Puerto Rico	Ponce	PR	
00238610	UEI College	Phoenix	AZ	
00148277	Universal Technology College of Puerto Rico	Aguadilla	PR	(b)(6)
00148280	Universal Technology College of Puerto Rico	Camuy	PR	
00233044	Universidad San Ignacio De Loyola S.A.	Lima	Lima	
00061155	Universidad San Ignacio Loyola	Lima		
00108638	Valley College	Beckley	WV	
00108644	Valley College	Princeton	WV	
00012804	Valley College	Martinsburg	WV	
00010582	Virginia College	Birmingham	AL	
00023668	Virginia College	Montgomery	AL	
00022050	Virginia College	Biloxi	MS	
00034181	Virginia College	Columbia	SC	
00018779	Virginia College	Jackson	MS	
00019670	Virginia College	Mobile	AL	
00040822	Virginia College	Macon	GA	
00062295	Virginia College	Columbus	GA	
00024833	Virginia College	North Charleston	SC	
00073373	Virginia College	Tulsa	OK	
00019669	Virginia College	Pensacola	FL	
00023959	Virginia College	Greenville	SC	
00041407	Virginia College	Baton Rouge	LA	
00019779	Virginia College	Austin	TX	
00023095	Virginia College	Chattanooga	TN	
00010424	Virginia College	Huntsville	AL	
00145523	Virginia College	Florence	SC	
00043122	Virginia College	Spartanburg	SC	
00043594	Virginia College	Richmond	VA	
00045919	Virginia College	Savannah	GA	
00024563	Virginia College	Jacksonville	FL	
00173613	Virginia College	Fort Pierce	FL	
00165129	Virginia College	Greensboro	NC	
00108695	Virginia College	Knoxville	TN	
00221316	Virginia College	Lubbock	TX	(b)(6)

00024697	Virginia College	Augusta	GA	(b)(6)	
00141660	Virginia College	Bossier City	LA		
00023099	Virginia International University	Fairfax	VA		
00048193	Virginia University of Oriental Medicine	Fairfax	VA		
00010480	West Tennessee Business College	Jackson	TN		
00010484	West Virginia Business College	Wheeling	WV		
00010868	West Virginia Business College	Nutter Fort	WV		
00019725	West Virginia Junior College	Bridgeport	WV		
00010492	West Virginia Junior College	Morgantown	WV		
00048390	Wright Graduate University for the Realization of Human Potential	Elkhorn	WI		

# BUSINESS PRACTICES COMMITTEE MINUTES

Tuesday, April 4, 2017

10:30 a.m. – 12:00 p.m.

## COMMITTEE MEMBERS

Dr. Fardad Fateri, Chair  
Ms. Julie Blake  
Dr. Rafael Ramirez-Rivera  
Dr. Edward Thomas  
Dr. Judy Timm

## STAFF LIAISONS

Ms. Perliter Walters-Gilliam – Primary Liaison  
Ms. Jan A. Chambers – Secondary Liaison

## OTHER

Ms. LaToya Boyd  
Dr. Terron King  
Ms. Cathy Kouko  
Ms. Linda Lundberg  
Ms. Katie Morrison  
Mr. Maurice Wadlington  
Ms. Karly Zeigler

## I. CALL TO ORDER

Chair Fateri called the meeting to order at 11:36 a.m. on Tuesday, April 4, 2017.

## II. OLD BUSINESS

### 1. AT-RISK INSTITUTION GROUP (ARIG) / REPORT ON ADVERSE INFORMATION

*Staff Walters-Gilliam provided a brief overview of the purpose of ARIG, along with its current membership (consisting of staff Jan Chambers, Steven Gelfound, Terron King, Perliter Walters-Gilliam, Roger Williams, and Karly Zeigler). Staff Walters-Gilliam provided updates for current open adverse cases. There are four open adverse cases, along with five institutions that we are currently monitoring due to external information (refer to **Appendix A**).*

### 2. SPECIAL VISIT UPDATE /REPORT ON COMPLAINTS

*Staff Chambers identified 25 campuses that received unannounced visits during the Winter 2017 travel cycle, as directed by ARIG (refer to **Appendix B**). Staff Chambers reviewed the reason for each evaluation visit, along with a brief overview of any findings identified during the visit. Staff Chambers also briefly summarized the complaint activity for the year-to-date seen below.*

**Average Processing Time: January 1, 2017 – April 4, 2017**

Complaint 19 days

**Percentage Closed and Open: January 1, 2017 – April 4, 2017**

Of the 31 issues opened, 13 were closed: 42%

**Total number of complaints: January 1, 2017 – April 4, 2017**

Plaintiff's lawsuit	1
Student	6
Former Student	15
Faculty	2
Former Faculty	3
Administrator	4
<b>Total</b>	<b>31</b>

**III. NEW BUSINESS**

**1. UNANNOUNCED VISIT FEES – BPC/4.17/1**

*ISSUE:*

The current version of the Accreditation Criteria states that there is no fee assessed for an unannounced visit and that the institution will be billed for expenses. This has proven to be cumbersome, especially when it comes to trying to collect expenses in order to invoice the school in a timely manner.

*OVERVIEW:*

Over the past year, there has been an increased use of unannounced visits. This has made apparent the need to have a more manageable procedure for covering the cost of expenses incurred.

At the February Policy Meeting, Council directed staff to make the language consistent between the scheduled visit fees criterion and those for unannounced. Therefore, proposed modifications to 2-1-405 are also outlined below.

*CRITERIA:*

**2-1-405. Expenses Fees.** Visit expenses for all team members, including the ACICS staff member who accompanies the team, shall be paid by the institution. Expenses include an honorarium for members of the team. A fee will be assessed for this visit. Failure to remit payment for the visit fee may result in an adverse action.

**Appendix B (in Criteria)**

## **Expenses Fees**

A flat fee will ~~not~~ be assessed for this visit, ~~but each institution will be billed for expenses incurred during the visit.~~ Failure to remit payment for expenses this fee may result in a ~~directive to show cause why the accreditation of the institution should not be withdrawn.~~ an adverse action.

*Staff Zeigler presented proposed Criteria changes regarding unannounced visit fees. Commissioner Ramirez-Rivera asked for clarification for the purpose of replacing the term “flat fee” with “fee”. Staff Walters-Gilliam and Zeigler stated that a “fee” is more broad than a “flat fee”, as a “fee” can change dependent upon the amount of team members and days needed for an on-site visit.*

MOTION: Approve the proposed policy presented and publish it in the Memorandum to the Field.  
MOVED: Thomas  
SECONDED: Ramirez-Rivera  
ABSTENTION: None  
ACTION: Passed

## **2. COUNCIL HEARING PROCEDURES – BPC/4.17/2**

### *ISSUE/OBJECTIVE:*

The Council moved at the December 2016 meeting to adjust the *Criteria* to require all show cause hearings to be in writing, unless an in-person hearing is desired by the Council. Therefore, all show-causes will require a response from the institution/campus which is reviewed by a panel of Commissioners, and “hearing” is no longer an accurate depiction of the review held. The ACICS staff recommend that the language referring to the Council “[allowing] a hearing in person” should be adjusted so that schools are not misled to believe they can request a hearing in person.

An institution would not need to send a notification of acceptance of an in-writing hearing, as the submittal of their response (and fee) alone would be confirmation of the understanding of its show-cause status.

The expenses of a court reporter for a hearing should also be covered by the participating institution, so that language has been modified accordingly.

Lastly, staff found that the language in 2-3-500(c) (now proposed (b)) which indicates that the institution may present only evidence not already considered is not procedurally correct for show-cause hearings/reviews – specific requests for information are made in a show-cause letter, which may require the institution to submit new evidence. It is only after a denial or withdrawal by suspension action that new evidence will not be considered in a Review Board hearing. This is covered in the *Criteria* on the Review Board appeal process.

*CRITERIA:*

**2-3-230. Show-cause Directive.**

...The issuance of a show-cause directive may be considered the basis for an institutional review or hearing in person, at the discretion of the Council, as defined in Section 2-3-500. A suspension order or denial action may be issued by ACICS as the result of ~~this hearing~~ the Council's review of the institution's response or the hearing, and such action is considered a final action which may only be appealed to the Review Board of Appeals as described in Section 2-3-600. All institutions that are issued a show-cause directive by the Council will be directed to submit a school closure plan and may be required to submit a teach-out agreement as described in Section 2-2-303 of the *Accreditation Criteria*.

**2-3-500 – COUNCIL HEARING-REVIEW OR HEARING PROCEDURES**

All institutional reviews~~hearings~~ will be in writing unless the Council exercises its sole discretion to require ~~allow~~ a hearing in person before the Council. The following procedures will govern reviews to be conducted by and ~~hearings to be held before the Council~~:

- (a) ~~The acceptance of a hearing must be made by a date determined by the Council, which will not be less than 10 days from the date of receipt of the letter of notification of the show-cause directive. The acceptance of a hearing must be in writing and signed by the chief executive officer of the institution. Upon receipt of the acceptance of a hearing, the Council will notify the institution of the procedures to follow to prepare for the hearing.~~
- (b) (a) The institution shall have the right to respond with evidence and facts concerning the areas of noncompliance with which it has been charged, to raise all reasonable questions, and to present evidence in opposition to or extenuation of the charges of noncompliance. Such written evidence must be submitted by the date prescribed by the Council unless the institution can show that such information was not available before the submission date and that failure to make a timely submission was outside of the institution's control.
- (c) (b) In the event that the Council requires a hearing in person, the acceptance of an in-person hearing must be made by a date determined by the Council, which will not be less than ten (10) days from the date of receipt of the letter of notification of show-cause directive. The acceptance of the in-person hearing must be in writing and signed by the chief executive officer of the institution. Upon receipt of the acceptance of the hearing, the Council will notify the institution of the procedures to follow to prepare for the hearing. In the event that the Council allows a hearing in person, the institution may present only evidence not already considered. The institution may send one or more representatives, including legal or financial counsel, to present its argument in opposition to or extenuation of the Council action. The Council transcribes all such hearings for its records. A copy of the transcript is available to the institution upon request.

**2-3-501. Institutional Review or Hearing Format.** Institutional reviews conducted by and hearings before the Council resulting from a show-cause directive and involving areas of noncompliance other than or in addition to financial concerns will take place before a panel of commissioners.

A review or hearing panel of at least three commissioners will be designated by the Council to review the written response and hear the presentation of the institution, if applicable. The panel will present its findings and its recommended action to the full Council, which will make the final decision within the time frames specified in Title II, Chapter 3.

**2-3-502. *Financial Reviews or Hearings.*** All reviews conducted by or hearings before the Council for financial concerns only will be deliberated or heard by a panel of at least three commissioners, which will include at least one representative of the Financial Review Committee. The panel will present its findings and its recommended action to the full Council, which will make the final decision within the time frames specified in Title II, Chapter 3.

*Staff Morrison presented the above proposed Criteria changes regarding council hearing procedures with no objection.*

MOTION: Approve the proposed policy presented and publish it in the Memorandum to the Field.  
MOVED: Thomas  
SECONDED: Ramirez-Rivera  
ABSTENTION: None  
ACTION: Passed

### **3. NOTIFICATION OF PROGRAM TEACH-OUT – BPC/4.17/3**

#### ***ISSUE/OBJECTIVE:***

The *Criteria* does not currently indicate that the Council should be notified of a program-level teach-out prior to the start of a teach-out, as a campus would do with a standard campus-level teach-out.

#### ***CRITERIA:***

**2-2-503. *Termination of Programs.*** The withdrawal of approval for a program following the issuance of program show-cause or compliance warning or a decision by an institution to terminate any program voluntarily must be appropriately communicated to all interested publics prior to the start of a program-level teach-out. These publics include, but are not limited to, students, governmental agencies, the local community, and ACICS.

All institutions subject to the withdrawal of approval for a program or who voluntarily terminate an approved program will be directed to submit, also prior to the start of a teach-out, a program termination application~~plan~~ that conforms to the following requirements. New students may not be enrolled in any program which cannot be completed prior to the termination date for which public notice has been given. Moreover, the institution is obligated to continue to offer appropriate courses, including prerequisites, so that currently enrolled students will be able to complete the program and receive the credential which was their designated educational objective. For this purpose, the period of time need not extend beyond sufficient time for students already enrolled and maintaining normal academic process to complete the program...

*Staff Morrison presented the above proposed Criteria changes regarding notification of program teach-outs with no objection.*

MOTION: Approve the proposed policy presented and publish it in the Memorandum to the Field.  
MOVED: Thomas  
SECONDED: Blake  
ABSTENTION: None  
ACTION: Passed

#### **4. REVISION OF CHANGE OF OWNERSHIP/CONTROL ACTION – BPC/4.17/4**

*ISSUE:*

The heading for the Criteria as currently written does not include denial actions for change of ownership.

*OVERVIEW:*

This information was presented during the February 2017 Policy Meeting and was asked to be brought back with revisions to the April 2017 Council Meeting.

*CRITERIA:*

**2-3-302. Denial of Renewal of Accreditation or Denial of Reinstatement of Accreditation Following Change of Ownership/Control.** An institution that objects to a Council decision to deny an application for a renewal of accreditation or reinstatement of accreditation following a change of ownership or control has the right to appeal the decision to the Review Board of Appeals pursuant to the procedures described in 2-3-604.

*Staff King presented the above proposed Criteria change, which will include additional language in the title of standard 2-3-302, with no objection.*

MOTION: Approve the proposed policy presented and publish it in the Memorandum to the Field.  
MOVED: Thomas  
SECONDED: Ramirez-Rivera  
ABSTENTION: None  
ACTION: Passed

#### **IV. FUTURE AGENDA/ADDITIONAL COMMENTARY**

- Staff Morrison informed the committee that staff will be revising the Program Termination Application in the near future. The changes to the application are procedural and will not need to be presented to the Council for approval.

## **V. ADJOURNMENT**

Chair Fateri motioned for adjournment which was seconded by Commissioner Blake. The Committee adjourned the meeting at 12:08 p.m.

## AT-RISK INSTITUTIONS' GROUP (ARIG) EXTERNAL INFORMATION REVIEW APRIL 2017

### Current Statistics:

<u>Open External Informaton Review:</u>	4 cases
<u>External Information Under Additional Review:</u>	5 cases

### Open External Informaton Review:

#### 1. Career Education Corporation - NY & FL Offices of Attorneys General / USDOE

##### Summary of Issues:

While submitting documents for a subpoena issued by the New York Attorney General's office, Career Education Corporation (CEC) reported findings of improper placement practices at some of its campuses. They launched an internal investigation to try and discover how the practices affected their reported placement rates. Meanwhile, state investigations were also initiated in Florida and Illinois. All of the State Attorney General activity is based on verification that the schools have not violated various consumer protection laws in the state. The states have subpoenaed documents relating to marketing, advertising, recruitment, placement and student outcomes.

The state initiated investigations led to an inquiry from the Chicago/ Denver School Participation Team of the USDOE, requesting copies of all subpoenaed documents and all adverse information responses.

ACICS was notified that ACCSC opened adverse against their CEC schools and asked for a response to the issues. Subsequently, ten campuses of CEC were show-caused by ACCSC, citing the integrity of their placement practices and employment data.

##### August 2016 Status:

CEC indicates that the office of the Attorney General of the State of Connecticut continues as the lead agency for a multi-state civil investigative demand of whether "CEC and its schools have complied with certain state consumer protection laws, and generally focus on the Company's practices relating to the recruitment of students, graduate placement statistics, graduate certification and licensing results and student lending activities, among other matters." CEC indicates it continues to cooperate with a view towards resolving these inquiries "as promptly as possible." CEC has met with representatives of the Multi-State AGs and engaged in a dialogue towards a resolution of these inquiries.

In a recent disclosure to share owners and the Securities and Exchange Commission (SEC), CEC has indicated "At the conclusion of any of these matters, the Company or certain of its schools may be subject to claims of failure to comply with state laws or regulations and may be required to pay significant financial penalties and/or curtail or modify their operations. Other state attorneys general may also initiate inquiries into the Company or its schools."

CEC's participation in federal student aid programs is provisional currently and extends through December 31, 2016. Each CEC institution must apply for recertification by September 30, 2016 in order to continue its eligibility to participate in Title IV Programs. CEC acknowledges that it "cannot predict whether, or to what extent, any of these inquiries or future resolutions of these inquiries might impact our Title IV eligibility. Depending on the circumstances of any resolution of these inquiries, ED may revoke, limit, suspend, delay or deny the institution's or all of the Company's institutions' Title IV eligibility, or impose fines. If any of the foregoing occurs, our business, reputation, financial position, cash flows and results of operations could be materially adversely affected."

The institution further indicated that it "cannot reasonably estimate a range of potential monetary or nonmonetary impact these investigations might have on the Company because it is uncertain what remedies, if any, these regulators might ultimately seek in connection with these investigations."

In addition, the institution has acknowledged that it continues to receive "informal requests from state Attorneys General and other government agencies relating to specific complaints they have received from students or former students which seek information about the student, our programs, and other matters relating to our activities in the relevant state. These requests can be broad and time consuming to respond to, and there is a risk that they could expand and/or lead to a formal inquiry or investigation into our practices in a particular state."

Regarding the Federal Trade Commission (FTC) issue, the institution indicates the investigation into its advertising, marketing or sales regarding "deceptive or unfair acts or practices" is in its early stages; that CEC continues to cooperate with the inquiry in order to resolve the issues promptly; and that it cannot estimate potential monetary or non-monetary impact on the company's ongoing operations.

**December 2016 Status:**

The following information was requested from the institution concerning its last response to ACICS:

1. A summary of CEC's meeting with the representatives of the Multi-State AGs along with any communication from, and to, the AGs concerning the civil investigative demand of whether CEC and its schools have complied with certain state consumer protection laws.
2. Evidence that each CEC institution has applied for recertification with the USDOE SFA given their current provisional status. Further, given that the approval is currently provisional, a summary of the current teach-out schedule for the institutions must be provided along with a narrative on the contingency plan if the USDOE does not approve the recertification by December 31, 2016.

3. Additional information on the Federal Trade Commission's investigation into the institutions' advertising, marketing or sales. This should include any requests from the FTC and the institutions' response.

In its response to the request, the institution provided the following:

1. A copy of the except in its 10Q, for the quarter ending September 30<sup>th</sup> concerning the civil investigative demands and subpoenas of these 18 Attorney Generals with Connecticut serving as the lead in this investigation. The summary was very general and the same as was previously submitted to ACICS. However, a draft copy of a confidential settlement with the AGs, dated September 16, 2016, was also shared with ACICS to demonstrate the company's intent to resolve the matter in an expeditious manner.
2. Evidence the campuses application for recertification with the USDOE SFA was submitted by the deadline along with affirmation (as outlined in the SFA Handbook) that the campuses will remain eligible for Title IV while the USDE completes its review of these applications. Hence it is not concerned about losing eligibility to participate. However, its contingency plan would include the consideration of self-funding, waiving tuition for remaining Title IV students, or appealing the Department's decision. According to the most current Teach-Out schedule provided (11.29.16), the last campuses would complete the teach-out in April 2018 and are Sanford-Brown College Seattle and Sanford-Brown College Tampa. ARIG confirmed the company's smooth and organized closure of a number of campuses to date and notes the good faith effort to ensure the best for students. Enrollment ceased in August 2015 upon announcement of the teach-out plan.
3. Since its original request in 2015, the FTC has not provided or contacted the corporation concerning its civil investigative demand. According to the institutional representatives, on a conference call and in its response, the only interaction with the FTC has been through legal counsel on the scope and timing of the request. A copy of the CID was provided to ACICS along with the public disclosure of this investigation in the company's 10Q.

#### **April 2017 Status:**

*The institution provided updates regarding the following on-going adverse information:*

1. **The Multi-State Attorney General Investigation:**  
CEC provided its most recent public update on this investigation by submitting a portion of the Securities and Exchange Commission's "Form 10-K" for the year ending in December 31, 2016, that was filed with the Securities and Exchange Commission on February 23, 2017. There was no substantial updated information included
2. **Recertification Status with the U.S. Department of Education (USDOE):**  
CEC's ten main campuses accredited by ACICS applied for approval of continued participation in Title IV programs (recertification) before the September 30, 2016, deadline. Since that time, two main campuses have completed teachouts, leaving

eight remaining campuses. CEC will not seek other accreditation for their ACICS-accredited campuses, as the teach out of these campus is expected to be completed prior to the June 12, 2018 expiration of the provisional participation participation agreements issued by the USDOE to ACICS-accredited institutions.

### **3. Federal Trade Commission Investigation (FTC):**

CEC reported that there have been no meetings or discussions with the FTC since their last update provided to ACICS in December 2016. The only contact has been by CEC's outside counsel whose conversations have been limited to the scope, timing and order of providing the information requested.

**Conclusion:** This case will remain open but will be monitored through ARIG's monthly meetings and based on a collective review of all risk factors to determine what additional investigative actions needed.

## **2. National College - Kentucky Attorney General's Office**

### **Summary of Issues:**

The Kentucky Attorney General's launched an investigation into Daymar Colleges in that state, citing misrepresentation, admission of students not meeting requirement, falsification of grades etc. They also launched an investigation into National College, citing misrepresentation of placement rates based on a calculation that National was using on their website. (2012)

### **December 2016 Status:**

According to the update provided by American National University, discovery disputes have slowed the process with both parties filing motions to compel. There was an original trial date set for October 10 - 17, 2016 but that had to be rescheduled as a result of the August 25, 2016 hearing during which the Court extended the discovery process. A status conference has been set for January 18, 2017 at which time the Court will evaluate the progress made to determine the need for continued discovery or to set a trial date. Finally, the Judge who considered the case on August 25 has since announced his retirement and a new judge has not yet been appointed.

### **April 2017 Status:**

According to the update provided by American National University, the case is still in the discovery phase. The institution reported that at the January 18, 2017 status conference, additional discovery issues were discussed and an additional status conference was scheduled for May 31, 2017. A new judge was appointed to fill the vacancy which will be created by the August 2017 retirement of the current judge hearing the case. The necessity for the new judge to update themselves on the litigation will possibly delay the proceedings. The institution anticipates the trial date to be set in early to mid-2018.

**Conclusion:** ARIG will continue to monitor the ANU case.

### **3. Harris College of Business/Premiere Education Group – NY Times, Linwood, NJ**

#### **Summary of Issue:**

News media reports from February 2014 described litigation filed against Harris College of Business by former employees contending that school officials “routinely misled students about their career prospects, and falsified records to enroll them and keep them enrolled.” The complaint is an amended version of a qui tam / False Claims Act lawsuit brought by the same individuals in 2011 but undisclosed publically. After formal investigations, both Federal and State prosecutors declined to prosecute the allegations under federal and state whistle blower statutes. The individuals then decided to pursue litigation through civil action, which prompted the public disclosure and coverage by the news media. (2014)

#### **April 2016 Status:**

Harris School of Business continues to contest the appeal of the former favorable court decision by the state of New Jersey. One of the key issues will be argued in front of the New Jersey Supreme Court in April. The institution noted that the state Department of Justice had declined to intervene in the matter after reviewing the allegations and numerous documents.

#### **December 2016 Status:**

A response from the institution’s legal counsel outlined the current status of the case before the Courts.

#### **April 2017 Status:**

The institution’s response indicated that on February 11, 2017, the parties submitted supplemental briefs to the court, but no further action has been taken in the case by either party or the court.

**Conclusion: ARIG will continue to monitor the ANU case.**

### **4. Spencerian College - Attorney General of Kentucky, Louisville & Lexington**

#### **Summary of Issues:**

The Attorney General of Kentucky has filed a lawsuit claiming that Spencerian College violated the Kentucky Consumer Protection Act, by providing unfair, false, misleading and deceptive information to consumers about job placement rates, graduation success and Spencerian operations in general. Specifically the complaint alleges discrepancies between placement rates reported to ACICS and those advertised by Spencerian. (2013)

#### **April 2016 Status:**

Litigation continues to be in the discovery stage. Spencerian College has submitted answers to Interrogatories and well over 100,000 documents in response to requests. Counsel for the College and the AG’s Office continue discuss certain discovery issues with respect to the applicability of FERPA regulations to certain documents/data requested. The FERPA issues have been narrowed, and notifications have been sent to Spencerian graduates. There remain, however, additional discovery issues with FERPA implications which have not been resolved.

### **December 2016 Status:**

In its letter dated November 28<sup>th</sup> to Mr. William's request for information on November 22<sup>nd</sup>, the institution asserts its resolve to defend the lawsuit and to deny the claims that it violated Consumer Protection laws. The communication was similar to the report previously submitted to ACICS concerning the information provided to the the AG and the discovery stages of the litigation.

### **April 2017 Status:**

The institution reported that there are no updates and the litigation against them is still in the discovery stage despite submitting over 100,000 documents in response to the Requests for Production of Documents filed by the Kentucky Attorney General.

**Conclusion:** Through the ARIG process, this case will be monitored to include the review of other elements of risk which may trigger more active investigation by ACICS.

### **External Information Under Additional Review:**

- American College of Commerce and Technology (ACCT), Falls Church, VA –** *Continued Show-Cause to the August 2017 meeting along with renewal reports during the spring 2017 visit cycle. The institution provided an update stating that they received a notice of "Conditional Certification" on December 12, 2016 from SCHEV, expiring on October 14, 2017. Due to ACICS losing recognition, SCHEV requires ACCT to report bi-monthly on the status of actions to achieve alternative accreditation by June 18, 2018. The first report has been submitted. ACCT and SCHEV are expecting a Hearing Officer decision no later than April 3, 2017 on the issue of SCHEV's recommendation to terminate ACCT certification to operate based on three allegations of non-compliance.*
- California University of Management and Sciences – Former Staff Lawsuit, Anaheim, CA –** *Renewal of accreditation review took place in the winter 2017 cycle with 13 findings identified between the main campus in California and the branch in Virginia.*
- Computer Systems Institute, Chicago, IL –** *The Council's remand action following the withdrawal by suspension order was to continue the show-cause directive originally initiated in February 2016, as a result of low 2016 student achievement results. The institution was also scheduled to undergo a renewal of accreditation review in the winter cycle but decided, at the last minute, to not continue with the renewal of application process. The continued show-cause directive will be considered at the April meeting.*
- Globe University and Minnesota School of Business, Minneapolis, MN –** *A show-cause directive was issued following notice that the Minnesota Office of Higher Education (MOHE) was moving forward to revoke the institutions' license to operate in the state. The day before the scheduled hearing before the Council, the institutions' received notice that the USDE acted to deny their application for recertification to participate in Financial Aid programs and their current approval would expire on December 31, 2016. In lieu of an in-person hearing so that the institution could work with its constituents, a*

*conference call was held with the institutions' leadership and the hearing panel to discuss its plans in light of this new information. The Council acted to continue the show-cause directive as the institutions work on teaching out and transferring out its current students at the campuses in the state of Minnesota.*

5. **Herguan University, Sunnyvale, CA – SEVP/ICE** – *institution is on continued show-cause following the review of its response to the original directive during the December 2016 review cycle. The institution was contesting the decision of SEVP to terminate its access to SEVIS and not allow, after January 11, 2017, its continued participation in the program.*

Appendix B

InstitutionName	VisitCity	VisitStatusCode	Visit State	VisitStart Date	InstMasterC ustomerId	ApprovalProcess Description
Art Institute of Salt Lake City	Draper	CONFIRMED	UT	2/7/2017	00032150	Special Visit
Branford Hall Career Institute	Springfield	CONFIRMED	MA	3/16/2017	00018785	Special Visit
Brown Mackie College - Akron	Akron	COMPLETED	OH	2/1/2017	00011239	Special Visit
Brown Mackie College - Atlanta	Atlanta	CONFIRMED	GA	2/2/2017	00020239	Special Visit
Brown Mackie College - Cincinnati	Cincinnati	COMPLETED	OH	1/13/2017	00010572	Special Visit
Brown Mackie College - Findlay	Findlay	COMPLETED	OH	2/2/2017	00010165	Special Visit
Brown Mackie College - Fort Wayne	Fort Wayne	COMPLETED	IN	1/19/2017	00010218	Special Visit
Brown Mackie College - Greenville	Greenville	COMPLETED	SC	1/30/2017	00024800	Special Visit
Brown Mackie College - Indianapolis	Indianapolis	COMPLETED	IN	2/10/2017	00023533	Special Visit
Brown Mackie College - Louisville	Louisville	COMPLETED	KY	2/10/2017	00020244	Special Visit
Brown Mackie College - San Antonio	San Antonio	CONFIRMED	TX	1/20/2017	00041546	Special Visit
Brown Mackie College - South Bend	South Bend	COMPLETED	IN	1/19/2017	00010695	Special Visit
Brown Mackie College - St. Louis	Fenton	COMPLETED	MO	2/13/2017	00029631	Special Visit
Brown Mackie College - Tucson	Tucson	CONFIRMED	AZ	1/25/2017	00011136	Special Visit
Brown Mackie College - Tulsa	Tulsa	CONFIRMED	OK	2/3/2017	00024239	Special Visit
Gallipolis Career College	Gallipolis	COMPLETED	OH	1/30/2017	00011098	Special Visit
Harris School of Business	Cherry Hill	COMPLETED	NJ	3/2/2017	00010547	Special Visit
McCann School of Business & Technology	Carlisle	COMPLETED	PA	1/19/2017	00029269	Special Visit
McCann School of Business & Technology	Dickson City	COMPLETED	PA	1/18/2017	00020097	Special Visit
Miami-Jacobs Career College	Troy	CONFIRMED	OH	2/9/2017	00023417	Special Visit
Miami-Jacobs Career College	Springboro	CONFIRMED	OH	2/10/2017	00022116	Special Visit
Miami-Jacobs Career College	Dayton	CONFIRMED	OH	1/31/2017	00010254	Special Visit
Miller-Motte Technical College	Gulfport	CONFIRMED	MS	2/13/2017	00048170	Special Visit
New York Institute of English and Business	New York	COMPLETED	NY	1/25/2017	00011328	Special Visit
Northwestern Polytechnic University	Fremont	COMPLETED	CA	2/16/2017	00015527	Special Visit

**EDUCATION ENHANCEMENT AND EVALUATION COMMITTEE AGENDA**

**Monday, April 3, 2017**

**3:00 PM – 4:30 PM**

Committee Members

Dr. Adriene Hobdy, Chair  
Ms. Elizabeth Guinan  
Dr. Deborah Jones  
Ms. Tibby Loveman  
Dr. Rafael Ramirez- Rivera  
Dr. Edward Thomas

Staff Liaisons

Dr. Terron King – Primary Liaison  
Ms. LaToya Boyd – Secondary Liaison

Other Attendees

Mr. Maurice Wadlington  
Ms. Shaniqua Smith  
Ms. Linda Lundberg  
Ms. Katie Morrison  
Ms. Karly Zeigler  
Ms. Cathy Kouko  
Ms. Niana Moore

**I. CALL TO ORDER**

Chair Hobdy called the meeting to order at 3:05 pm, April 3, 2017.

**II. OLD BUSINESS**

- None

**III. NEW BUSINESS**

**1. COMMITTEE:** EEE/4.17/1

**DATE:** April 3, 2017

**SUBJECT:** **Distance Education Approval**

**STAFF:** Terron King

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*The mission of the Education Enhancement and Evaluation Committee (EEE) is to establish standards for educational quality that assist institutions in mission fulfillment, program planning, non-traditional instructional delivery activities, development and implementation, institutional evaluation activities, and successful learning outcomes.*

## ISSUE

The Criteria addressing distance education currently requires new program approval prior to submission of an application for distance education for any program.

## OVERVIEW

This information was presented during the February 2017 Policy Meeting and was asked to be brought back with revisions to the April 2017 Council Meeting.

## CRITERIA

**2-2-106. Initiation of Distance Education (Online) or New Instructional Delivery Method.** Any institution that intends to initiate courses or programs delivered through an instructional method not currently included in the institution's scope of accreditation must secure approval from the Council. This includes any type of online instruction, including hybrid/blended, and any other new instructional delivery method. is the responsibility of the institution to secure approval from the Council of the intention to initiate online delivery if all courses and programs within the institution are currently approved for residential or face-to-face instructional delivery method. Any significant change in instructional delivery method requires prior Council approval.

An institution seeking to initiate a distance education course or program, including hybrid/blended instruction or other new instructional delivery methods, for a course or program currently approved for residential or face-to-face instructional delivery method, must submit a distance education application and the required documentation for Council review and approval before distance education is included in the institution's current scope of accreditation. The approval of distance education for an institution includes all of its campuses however, any campus seeking to initiate a distance education course or program must complete a distance education application and the required documentation.

The institution or campus must initiate the approval process through the submission of a new program application and required documentation information for Council review and approval before being included into the institution's current scope of accreditation.

## OPTIONS

1. Vote to approve the proposed policy presented below and publish it in the Memorandum to the Field.
2. Vote to approve the proposed policy with amendments shown below and publish it in the Memorandum to the Field:
3. Recommend a different approach to policy issue as stated below:
4. Remove from further consideration.

---

## RECOMMENDATION: Option 1

*The mission of the Education Enhancement and Evaluation Committee (EEE) is to establish standards for educational quality that assist institutions in mission fulfillment, program planning, non-traditional instructional delivery activities, development and implementation, institutional evaluation activities, and successful learning outcomes.*

**MOVED:** Commissioner Thomas moved to accept option 1 as proposed.

**SECONDED:** Commissioner Loveman moved to second the motion.

**MOTION PASSED**

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**2. COMMITTEE:** EEE/4.17/2

**DATE:** April 3, 2017

**SUBJECT:** **Denial Actions Not Affecting Overall Accreditation**

**STAFF:** Terron King

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**ISSUE**

The Criteria as it is currently written identifies branch-to-freestanding campuses and does not address any substantive changes which can be issued a denial action by the Council.

**OVERVIEW**

This information was presented during the February 2017 Policy Meeting and was asked to be brought back with revisions to the April 2017 Council Meeting.

**CRITERIA**

**2-3-303. ~~Other Denial Actions Not Affecting Overall Accreditation.~~** An institution that objects to a Council decision to deny an application for the addition of a program within the institution's current scope of accreditation for branch-to-freestanding status or new program inclusion will be given the opportunity to present its case to a panel of the Council and to be heard at a subsequent regularly scheduled meeting of the Council. The institution may offer new evidence that will be considered by the Council if timely submitted. or any substantive change addressed in Standard 2-2-101 will be given the opportunity to present its case to the Council.

**OPTIONS**

1. Vote to approve the proposed policy presented below and publish it in the Memorandum to the Field.
2. Vote to approve the proposed policy with amendments shown below and publish it in the Memorandum to the Field:
3. Recommend a different approach to policy issue as stated below:

*The mission of the Education Enhancement and Evaluation Committee (EEE) is to establish standards for educational quality that assist institutions in mission fulfillment, program planning, non-traditional instructional delivery activities, development and implementation, institutional evaluation activities, and successful learning outcomes.*

4. Remove from further consideration.

---

**RECOMMENDATION: Option 1**

**MOVED:** Commissioner Thomas moved to accept option 1 as proposed.

**SECONDED:** Commissioner Hobby moved to second the motion.

**MOTION PASSED**

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**3. COMMITTEE:** EEE/4.17/3

**DATE:** April 3, 2017

**SUBJECT:** **Substantive and Non-Substantive Changes**

**STAFF:** Katie Morrison

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**ISSUE/OBJECTIVE:**

The standards for substantive changes only dictate that approval must be obtained, prior to implementation, for an increase of 25 percent or more in the clock or credit hours of a program; they do not include the decrease of 25 percent or more, which could just as easily alter a program's compliance with *Criteria* and its credential level.

In addition, there has been no identified time frame for the notification to ACICS of non-substantive changes to existing programs. This leads the corresponding criterion to be, essentially, unenforceable and contributes to the discrepancy of program metrics between ACICS' database and the campus's own information. The *Criteria* also currently states that such changes are disclosed to the public via the ACICS website, which is not a current practice and would be quite cumbersome and unnecessary (especially given that substantive changes aren't disclosed to the public).

Finally, there is no mention that a campus should notify ACICS if *it does not implement* a substantive or non-substantive change, in order to always keep its information consistent with ACICS'. At the February policy meeting, the Council indicated that the changes should be implemented within one year of approval. \*\*The Council may also want to discuss if there should be a consequence for not notifying the Council if the changes are not implemented within the year.\*\*

**CRITERIA**

*The mission of the Education Enhancement and Evaluation Committee (EEE) is to establish standards for educational quality that assist institutions in mission fulfillment, program planning, non-traditional instructional delivery activities, development and implementation, institutional evaluation activities, and successful learning outcomes.*

**2-2-101. List of Substantive Changes.** The following institutional changes will be considered substantive and require Council approval before they can be included in the institution's scope of accreditation:

...(g) a 25% percent or greater change ~~increase~~ in the number of clock or credit hours awarded for successful completion of a program as described in Standard 2-2-109;...

It is the Council's expectation required that the change will occur within one year of approval. If the institution does not implement the change in this time frame, it shall notify the Council, and reapply for the change if it still seeks implementation. Requests to extend the proposed start date beyond one year of the initial date must be submitted to the Council.

**2-2-109. Increasing or Decreasing the Number of Clock or Credit Hours.** It is the responsibility of the institution to secure approval from the Council of the intention to initiate an change ~~increase~~ of 25 percent or greater in the number of clock or credit hours awarded for successful completion of a program. If the percentage is less than 25 percent but results in a change in the credential level, the credential level will be evaluated to be within the institution's scope of accreditation.

The institution or campus must initiate the approval process through the submission of a new program application and required documentation for Council review and approval before being included into the institution's scope of accreditation. The institution shall notify the Council if it does not implement the changes within one year of approval. Requests to extend the proposed start date beyond one year of the initial date must be submitted to the Council.

**2-2-121. Changes to Existing Programs.** Changes to existing or currently approved programs fall under (a) extensive changes and (b) non-substantive changes.

(a) *Extensive Changes.* An extensive change to existing program application process must be initiative and approval received prior to implementation. Failure to do so will result in a compliance warning for offering an unapproved program. The following changes will be considered substantive changes to the institution's scope of accreditation and require approval per Section 2-2-100—Substantive Changes:

- i. a 25% percent change ~~increase~~ in the number of clock or credit hours awarded for successful completion of an existing program; and
- ii. a change from clock hours to credit hours.

(b) *Non-substantive Changes.* These include minor changes to existing programs which do not substantially alter the scope, objectives and nature of the programs as described in Standard 2-2-151.

**2-2-151. Non-Substantive Program Changes.** Institutions and campuses are required to notify the Council of all non-substantive changes to existing programs within 30 days of implementation. ~~Changes in the program name, clock/contact hours, credits awarded, or program length will be disclosed to the public via the ACICS website~~ prior to implementation. The following non-substantive changes will be acknowledged:

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- (a) less than 25% percent change in existing contact hours; credits awarded, curriculum content (courses offered), or program length of a currently approved program within a 12-month period;
- (b) a change in the name of an existing program that does not change the overall objective of the program; and
- (c) a change from semester to quarter credit hours or vice versa.

If the institution applies for acknowledgment of non-substantive program changes prior to implementation, it must notify the Council if it chooses not to implement the changes following receipt of approval but chooses not to implement the changes within one year of approval, it must notify the Council. Requests to extend the proposed start date beyond one year of the initial date must be submitted to the Council.

### **OPTIONS**

1. Vote to approve the proposed policy presented below and publish it in the Memorandum to the Field.
2. Vote to approve the proposed policy with amendments shown below and publish it in the Memorandum to the Field:
3. Recommend a different approach to policy issue as stated below:
4. Remove from further consideration.

---

**RECOMMENDATION:** Option 1

**MOVED:** Commissioner Guinan moved to accept option 1 as amended.

**SECONDED:** Commissioner Jones moved to second the motion

**MOTION PASSED**

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**4. COMMITTEE:** EEE/4.17/4

**DATE:** April 3, 2017

**SUBJECT:** **Renewal of Accreditation Application Submission**

**STAFF:** Karly Zeigler

---

*The mission of the Education Enhancement and Evaluation Committee (EEE) is to establish standards for educational quality that assist institutions in mission fulfillment, program planning, non-traditional instructional delivery activities, development and implementation, institutional evaluation activities, and successful learning outcomes.*

## **ISSUE:**

Based on the current criteria, submission of renewal of accreditation applications currently can occur up to a year prior to an actual renewal of accreditation visit. Such a timeframe allows for several institutional changes to occur and therefore does not provide an accurate picture of the institution/campus

## **OVERVIEW**

In previous years, there has been a requirement that all renewal applications and fees were due by September 30<sup>th</sup>, the year prior to their scheduled renewal year. This last year we made a provisional adjustment to allow institutions to submit their applications and self-studies about two and a half months prior to their scheduled visit cycle. We found that this was a more manageable method and provided more accurate information since it was closer to the date of the visit. Therefore we propose adjusting the Criterion to make this a permanent change.

In addition, should the aforementioned revision be approved, staff proposes that language be added to prohibit any significant institutional change between the visit and the self-study submission. This would provide for a more accurate review and verification of the self-study.

## **CRITERIA**

### **2-1-300 – RENEWAL OF ACCREDITATION**

It is the responsibility of the institution to file an application and remit the appropriate fees for a renewal of accreditation three months prior to the start of the assigned review cycle, by September 30<sup>th</sup> of the year prior to the last year of the grant of accreditation. This also involves submission of the institution's renewal self-study, with supporting documents. Institutions that have not submitted a renewal self-study at least two months prior to the start of the assigned review cycle by December 1<sup>st</sup> of the year preceding expiration of the grant, and have not requested and received an appropriate extension or notified the Council of intent to voluntarily withdraw its accreditation, will be subject to late fees and may be issued a show-cause directive compliance warning. The accreditation previously granted to an institution expires automatically with the passage of time unless extended by an action taken by ACICS. An extension of the previous grant cannot exceed one year, and not more than one extension may be given except for extraordinary circumstances over which the institution has no control.

**2-1-301. Application.** The process of application for a renewal of accreditation is the same as for initial accreditation except that institutions are not required to undergo another resource visit. No substantive changes shall be made to the institution once the application has been submitted, leading up to the campus site visit. Multiple campus institutions that are applying for renewals of accreditation will be required to submit a separate self-study for each branch campus.

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## **OPTIONS**

1. Vote to approve the proposed policy presented below and publish it in the Memorandum to the Field.
2. Vote to approve the proposed policy with amendments shown below and publish it in the Memorandum to the Field:
3. Recommend a different approach to policy issue as stated below:
4. Remove from further consideration.

---

### **RECOMMENDATION: Option 1**

**MOVED:** Commissioner Loveman moved to accept option 1 as amended.

**SECONDED:** Commissioner Jones moved to second the motion.

### **MOTION PASSED**

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**5. COMMITTEE:** EEE/4.17//5  
**DATE:** April 3, 2017  
**SUBJECT:** Advertising – Third Party Services  
**STAFF:** Karly Zeigler

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### **ISSUE:**

Staff recommends the elimination of an element of Appendix C that has no known relevance to the review of institutional materials.

### **OVERVIEW**

The criterion that addresses third party services utilized for the purpose of advertising in Appendix C appears to no longer be relevant for the purpose of review. In recent years, there have been few, if any instances of the use of such practice. Further, the interpretation of the meaning of this criterion is consistent.

### **CRITERIA**

#### **Appendix C**

*The mission of the Education Enhancement and Evaluation Committee (EEE) is to establish standards for educational quality that assist institutions in mission fulfillment, program planning, non-traditional instructional delivery activities, development and implementation, institutional evaluation activities, and successful learning outcomes.*

**ADVERTISING** Any advertisement or promotional literature written or provided by an institution through any type of media shall be completely truthful and dignified. The material shall be presented in a manner which avoids leaving any false, misleading, or exaggerated impressions with respect to the institution, its personnel, its courses and services, or the occupational opportunities for its graduates. An English translation for advertising that is in a language other than English must also be available.

1. All advertising and promotional literature provided by an institution must clearly indicate that training or education, and not employment, is being offered.
2. All advertising and promotional literature must include the correct name of the institution. So-called "blind" advertisements are not permitted.
3. Institutions advertising to attract students in classified columns of newspapers or the equivalent on websites and other electronic publications must use only classifications such as "Education," "Schools," and "Instruction." Headings such as "Help Wanted," "Employment," and "Business Opportunities" may be used only to procure employees for the institution.
4. Testimonials used in advertising must reflect the opinions or experience of a current or prospective student or graduate of the institution. Testimonial messages must be factual and portray current conditions. They cannot contain any representations that would be deceptive or could not be substantiated by the institution. The institution must maintain a written release from the individual providing the testimonial on file.
5. An institution shall not use the words "free" and "guarantee" for advertising or marketing purposes in a manner that is misleading to prospective or current students. ~~A disclosure must be made for services which are funded by third parties that are offered at no cost to students.~~

#### **OPTIONS**

1. Vote to approve the proposed policy presented below and publish it in the Memorandum to the Field.
2. Vote to approve the proposed policy with amendments shown below and publish it in the Memorandum to the Field:
3. Recommend a different approach to policy issue as stated below:
4. Remove from further consideration.

---

#### **RECOMMENDATION: Option X**

**MOVED:** Commissioner Loveman moved to accept option 1 as amended.

*The mission of the Education Enhancement and Evaluation Committee (EEE) is to establish standards for educational quality that assist institutions in mission fulfillment, program planning, non-traditional instructional delivery activities, development and implementation, institutional evaluation activities, and successful learning outcomes.*

**SECONDED:** Commissioner Guinan moved to second the motion.

**MOTION PASSED**

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**6. COMMITTEE:** EEE/4.17/6  
**DATE:** April 3, 2017  
**SUBJECT:** **3-1-202 Integrity**  
**STAFF:** Anne Bennett

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**ISSUE**

Change the title of criterion 3-1-202 to a broader term.

**OVERVIEW**

Sometimes the only criteria that works for a finding is 3-1-202. But the name of the criteria usually suggests a much harsher finding than what is intended.

**CRITERIA**

**3-1-202. Institutional Integrity and Capability.** The integrity and capability of an institution is manifested by the professional competence, experience, personal responsibility, and ethical practices demonstrated by all individuals comprising the ownership, control, or management.

**OPTIONS**

1. Vote to approve as proposed and publish it in the Memorandum to the Field.
2. Vote to amend the policy and bring before the Council in April:
3. Recommend a different approach to policy issue as stated below:
4. Remove from further consideration.

---

**RECOMMENDATION:** Option 1

**MOVED:** Commissioner Guinan moved to accept option 1 as amended

**SECONDED:** Commissioner Loveman moved to second the motion

**MOTION PASSED**

*The mission of the Education Enhancement and Evaluation Committee (EEE) is to establish standards for educational quality that assist institutions in mission fulfillment, program planning, non-traditional instructional delivery activities, development and implementation, institutional evaluation activities, and successful learning outcomes.*

7. COMMITTEE: EEE/4.17/7

DATE: April 3, 2017

SUBJECT: Classification of “Centrally Controlled Institutions” and  
“Distributed Enterprise”

STAFF: Anne Bennett

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## ISSUE

Remove all references to “centrally-controlled institutions” and “distributed enterprise”

## OVERVIEW

To provide consistency of classification regarding institutions/campuses.

## CRITERIA

### 1-3-200 – Classification of Institutions

1-3-200. *Classification of Institutions.* The Council classifies institutions into ~~three~~ two categories: single campus; and multiple campus, ~~and distributed enterprise.~~ Classification depends upon the number of locations included within the institution and the nature of administrative control over educational activities at the institution.

~~1-3-203. Centrally Controlled Institution.~~ A centrally controlled institution is an institution that provides educational programs at multiple locations operating within the context of an administrative system. *\*Implementation of this section of the Criteria and all references to Centrally Controlled Institution is not yet effective. The effective date will be announced as soon as it has been determined by the Council.*

- (a) ~~The centrally controlled institution must include one main campus with branch campuses and an academic administrative center. The institution must demonstrate its capacity to add and to successfully control educational activities at multiple locations.~~
- (b) ~~The academic administrative center is the primary location of a centralized academic administrative system by which educational activities at a centrally controlled institution are controlled. These educational activities include development and delivery of instructional programs, hiring and evaluation of faculty, establishment and maintenance of facilities, selection and purchasing of instructional equipment and library resources, provision of academic and student support systems, and maintenance of financial stability. The physical address of an academic administrative center may be identical to or separate from that of a main campus. Some administrative activities not directly related to design and delivery of educational programs may be controlled at other locations affiliated with the academic administrative center.~~

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- (c) ~~To be classified as a centrally controlled institution, an institution must have~~
  - (i) ~~been accredited for at least ten consecutive years; and~~
  - (ii) ~~a main campus and at least three branch campuses that are currently accredited by ACICS and have been accredited by ACICS for at least the last four years.~~
- (d) ~~To be classified as a centrally controlled institution, an institution must provide satisfactory evidence of a well-established and highly centralized administrative system to ensure and enhance quality at all the campuses of the institution that includes the following:~~
  - (i) ~~clearly identified academic control;~~
  - (ii) ~~regular evaluation of the compliance of all the campuses with Council standards;~~
  - (iii) ~~adequate faculty, facilities, resources, and academic and student support systems;~~
  - (iv) ~~financial stability; and~~
  - (v) ~~long-range planning, including planning for expansion.~~

~~Compliance of a centrally controlled institution with the Accreditation Criteria is evaluated by the Council at the system level and also subsequently at the individual campus level. Accreditation is granted to the institution, with the specific inclusion of the main campus and all branch campuses.~~

## **Title II Chapter 1**

### **2-1-100 – Accreditation Workshop Requirements**

~~The Council schedules accreditation workshops each year. Applicants for initial or renewals of accreditation are required to attend a workshop. During these workshops, Council representatives will consult with institutional representatives to help them understand and complete the process. Institutional representatives are required to attend an accreditation workshop within 18 months prior to the final submission of the evaluation visit materials, which are due two weeks prior to an on-site visit. For initial applicants, the chief on-site administrators of main campuses and all branch campuses are required to attend. For currently accredited institutions, the chief on-site administrators or the renewal self-study coordinators for single campus institutions and multiple campus institutions, and representatives of centrally controlled institutions are required to attend. Currently accredited centrally controlled institutions are responsible for providing workshop information to the chief on-site administrators and renewal self-study coordinators of all main campuses and branch campuses.~~

### **2-1-300 – Renewal of Accreditation**

**2-1-301. Application.** ~~The process of application for a renewal of accreditation is the same as for initial accreditation except that institutions are not required to undergo another resource visit. Multiple campus institutions that are applying for renewals of accreditation will be required to submit a separate self-study for each branch campus. Institutions classified as centrally controlled institutions may submit a consolidated self-study with an appropriate supplement for~~

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~~each location.~~ The Council will not consider an application for a renewal of accreditation unless all reports are current and all fees are paid. (See Sections 2-1-801 and 2-1-802.)

### **2-1-400 – Visiting Teams, Selection and Composition**

**2-1-402. *Composition of Teams.*** The size and qualifications of the team are determined at the discretion of the Council based on the type and size of the institution, the type and number of programs being offered, the mode of educational delivery, location of the campus, student enrollment, credentials offered, and other special circumstances ~~such as visits to centrally controlled academic administrative centers.~~ Full-team on-site evaluation visits will consist of individuals serving as academic, administrative, public, or member representatives as defined in Appendix A, Bylaws.

### **2-1-500 – Team Functions and Procedures**

**2-1-503. *Procedures.*** Institutions are provided in advance with a checklist of materials and documents that should be current and readily available for review by the team. Prior to the visit, institutions are required to update the self-study where significant changes have occurred since its submission to ACICS. Teams visiting an academic administrative center will generate a report that will be shared with teams conducting visits to the individual campuses ~~within the centrally controlled structure.~~

### **2-1-600 – Post-Visit Procedures**

**2-1-601. *Opportunity to Respond.*** The ACICS office sends a copy of each evaluation team report to the designated representative at the ~~centrally controlled academic administrative center~~ main campus or to the chief on-site administrator of the respective multiple or single campus institution. These individuals are invited to respond in writing within the specified time frame.

### **2-1-800 – Maintaining Accreditation**

**2-1-801. *Annual Accountability Reports.*** The Annual Accountability Reports must be submitted on Council forms, comply with Council guidelines, and be certified by the chief executive officer of the institution. Data must be submitted separately on the Campus Accountability Report (CAR) for each main campus and for each branch campus. ~~A centrally controlled institution must also submit a consolidated Institutional Accountability Report (IAR) containing information and data on the institution as a whole.~~ These reports are due on or before November 1 annually. Failure to submit the Annual Accountability Reports in a timely manner will result in the revocation of accreditation.

**2-1-802. *Annual Financial Report.*** The Annual Financial Report must be submitted on Council forms and be certified by an officer or stockholder of the corporation. Data must be submitted separately for each campus included in a grant of accreditation. ~~A centrally controlled institution must also submit a consolidated report containing data on the institution as a whole.~~ It is due no more than 180 days after the end of the institution's fiscal year. Failure to submit the Annual Financial Report in a timely manner will result in the revocation of accreditation.

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## 2-2-200 – Redesignation of Campuses

~~2-2-203. *Designation of Centrally Controlled Institution.* An institution may apply for classification as a centrally controlled institution by submitting an application and attachments on forms provided by the Council. Upon review of these materials, an evaluation visit will be conducted at one or more administrative sites and designated campuses to verify the information submitted and assess the eligibility of the institution for this classification. A full report will be submitted to the Council for review and approval.~~

### 3-1-202. *Integrity.* ...

- (a) Emphasis shall be placed upon the efficiency and effectiveness of the overall administration of the institution. Attention shall be given to educational activities, admissions, student financial aid, financial operations, plant and equipment, student services, and compliance with applicable local, state, and federal laws. The degree of institutional compliance with the criteria in these areas is a measure of the administrative capability of the chief on-site administrator of a main campus or branch campus ~~and, for a distributed enterprise, the designated chief administrator of the institution.~~

## Glossary

~~**Institution, Distributed Enterprise.** An institution that provides educational programs at multiple locations operating within the context of a well-established and highly centralized administrative system. (See Section 1-3-203.)~~

## OPTIONS

5. Vote to approve the proposed policy presented below and publish it in the Memorandum to the Field.
6. Vote to approve the proposed policy with amendments shown below and publish it in the Memorandum to the Field:
7. Recommend a different approach to policy issue as stated below:
8. Remove from further consideration.

---

## RECOMMENDATION: Option 1

**MOVED:** Commissioner Thomas moved to accept option 1 as amended.

**SECONDED:** Commissioner Jones moved to second the motion.

## MOTION PASSED

*The mission of the Education Enhancement and Evaluation Committee (EEE) is to establish standards for educational quality that assist institutions in mission fulfillment, program planning, non-traditional instructional delivery activities, development and implementation, institutional evaluation activities, and successful learning outcomes.*

## **FUTURE AGENDA**

1. Discussion on the review and accreditation of programs with less than 300 hours.
2. Discussion on setting parameters for hybrid vs blended distance education.

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**FINANCIAL REVIEW COMMITTEE AGENDA**  
**Wednesday, April 5, 2017**  
**3:00 PM – 5:00 PM**

Committee Members

Mr. John Euliano, Chair  
Mr. Richard Bennett  
Ms. Julie Blake  
Dr. Fardad Fateri  
Dr. Lawrence Leak  
Mr. Roger Swartzwelder

Staff Liaisons

Ms. Julie Euliano – Primary Liaison  
Mr. Quentin Dean – Secondary Liaison

Additional Staff:

Mr. Steven Gelfound  
Ms. Linda Lundberg

CALL TO ORDER

John Euliano called the meeting to order at 2:58 p.m., Wednesday, April 5, 2017.

I. OLD BUSINESS

A. Consent Agenda for Institutions Previously on QFR

1. +(20271) Court Reporting Institute of St. Louis, Clayton, MO – 0 points
2. (10469) Duluth Business University, Duluth, MN – 1 point
  
3. (10190) EDIC College, Caguas, PR – 1 point

Vote on item 3 above separately:

MOTION:	Remove from QFR
MOVED:	Leak
SECONDED:	Fateri
ACTION:	Approved

+denotes closure plan

\*denotes institution also has a financial adverse included in this agenda

4. \*(10602) Empire College, Santa Rosa, CA – 0 points
5. (44818) Felbry College School of Nursing, Columbus, OH – 0 points
6. (11150) Florida Career College, Miami, FL – 0 points
7. (10950) Lincoln Technical Institute, Edison, NJ – 1 point
8. (10399) Metro Business College, Cape Girardeau, MO – 1 point
9. +(11103) Minnesota School of Business, Richfield, MN – 0 points
10. +(10292) Stone Academy, West Haven, CT – 0 points

11. (28284) SAE Institute of Technology, Los Angeles, CA – 4 points
12. (32108) SAE Institute of Technology, N. Miami Beach, FL – 0 points

Vote on items 11 and 12 above separately:

MOTION: Continue on QFR  
 MOVED: Swartzwelder  
 SECONDED: Fateri  
 ACTION: Approved

MOTION: Items 1-2 and 4-10 continue on QFR

MOVED: Leak  
 SECONDED: Bennett  
 ACTION: Approved  
 ABSTAIN: Fateri on item 6 above, Florida Career College

B. Consent Agenda for Institutions Previously on FIP

1. (27446) Broadview University-West Jordan, Woodbury, MN – 4 points
2. (11105) National Latino Education Institute, Chicago, IL – 0 points
3. (11332) Ridley-Lowell Business & Technical Institute, Binghamton, NY – 6 points
4. (11303) Ridley-Lowell Business & Technical Institute, New London, CT – 1 point

Vote on item 4 above separately:

MOTION: Remove from Reporting  
 MOVED: Swartzwelder  
 SECONDED: Bennett  
 ACTION: Approved

+denotes closure plan

\*denotes institution also has a financial adverse included in this agenda

5. (10657) Southern Technical College, Fort Myers, FL – 3 points
6. (20720) Southern Technical College, Orlando, FL – 3 points
7. (10506) Spencerian College, Lexington, KY – 6 points
8. (15803) Sullivan College of Technology and Design, Louisville, KY – 3 points

MOTION: Items 1-3 and 5-8 Continue on FIP  
 MOVED: Swartzwelder  
 SECONDED: Blake  
 ACTION: Approved  
 Abstain: Bennett, Items 5-6

C. Institutions Previously on FIP

1. (22465) Jose Maria Vargas University, Pembroke Pines, FL – 7 points

MOTION: Continue on FIP  
 MOVED: Bennett  
 SECONDED: Leak  
 ACTION: Approved

2. (11328) New York Institute of English and Business, New York, NY – 7 points

MOTION: Continue on FIP  
 MOVED: Euliano  
 SECONDED: Bennett  
 ACTION: Approved

3. (28864) Tribeca Flashpoint Media Arts Academy, Chicago, IL – 7 points

MOTION: Continue on FIP  
 MOVED: Bennett  
 SECONDED: Fateri  
 ACTION: Approved

D. Institutions Subject to Change in Review Status – Previously QFR

1. (11238) American National University, Lexington, KY – 0 points
2. (10278) American National University, Salem, VA – 0
3. (10683) National College, Nashville, TN – 0 points

+denotes closure plan

\*denotes institution also has a financial adverse included in this agenda

4. \*(10418) Coleman University, San Diego, CA – 9 points

Vote on item 4 above separately:

MOTION: Place on show-cause. Request institution to demonstrate financial stability given the losses based on December numbers that were self-reported and auditor's findings, including inadequate accounting practices. Include a FIP. Provide update on corrective action plan.

MOVED: Bennett  
SECONDED: Blake  
ACTION: Approved  
ABSTAIN: Swartzwelder

5. +(10306) Daymar College, Owensboro, KY – 19 points
6. (24852) Peloton College, Dallas, TX – 7 points
7. (11116) Prince Institute, Southeast, Elmhurst, IL – 7 points

MOTION: Remove items 1-3 from reporting. Items 5-7 Continue on QFR  
MOVED: Bennett  
SECONDED: Leak  
ACTION: Approved

#### E. Institutions Subject to Change in Review Status – Previously FIP

1. (20292) California Intl Business University, San Diego, CA – 0 points
2. +\*(12400) Colorado Heights University, Denver, CO – 10 points
3. +(10898) Globe University, Woodbury, MN – 16 points
4. (70534) Pittsburgh Career Institute, Pittsburgh, PA – 13 points

MOTION: Item 1, remove from reporting. Items 2-3 place on QFR. Item 4, continue on FIP.  
MOVED: Bennett  
SECONDED: Leak  
ACTION: Approved

+denotes closure plan

\*denotes institution also has a financial adverse included in this agenda

Career Education Corporation

1. +(48705) Le Cordon Bleu College of Culinary Arts, Scottsdale, AZ – 8 points
2. +(19019) Le Cordon Bleu College of Culinary Arts, Pasadena, CA – 8 points
3. +(48280) Le Cordon Bleu College of Culinary Arts, San Francisco, CA – 10 points
4. +(38375) Le Cordon Bleu College of Culinary Arts, Portland, OR – 4 points
5. +(21352) Le Cordon Bleu College of Culinary Arts, Austin, TX – 0 points
6. +(11161) Sanford-Brown College, Tampa, FL – 10 points
7. +(11132) Sanford-Brown College-Chicago, Chicago, IL – 1 point
8. +(70523) Sanford-Brown College, Mendota Heights, MN – 13 points

MOTION: Place on QFR  
MOVED: Euliano  
SECONDED: Bennett  
ACTION: Approved

Delta Career Education Corporation

1. (11194) McCann School of Business and Technology, Pottsville, PA – 10 points
2. (12392) Tucson College, Tucson, AZ – 13 points
3. (114473) Berks Technical Institute, Wyomissing, PA – 0 points
4. (10911) Miller-Motte Technical College, Clarksville, TN – 1 point
5. (10317) Miller-Motte Technical College, Lynchburg, VA – 1 point

MOTION: Continue on FIP  
MOVED: Fateri  
SECONDED: Blake  
ACTION: Approved  
ABSTAIN: Swartzwelder

Fortis Institute

1. (10934) Fortis Institute, Erie, PA – 1 point
2. (16005) Fortis College, Orange Park, FL – 0 points
3. (10770) Fortis College, Norfolk, VA – 10 points

MOTION: Place institution on show-cause (Education Affiliates)  
MOVED: Leak  
SECONDED: Fateri  
ACTION: Approved  
ABSTAIN: Euliano

+denotes closure plan

\*denotes institution also has a financial adverse included in this agenda

Zenith Education Group, Inc.

1. +(10748) Everest College, Springfield, MO – 14 points
2. (11101) Everest College, Thornton, CO – 16 points
3. (147010) Everest College, Woodbridge, WA – 10 points
4. (11333) Everest College, Henderson, NV – 14 points

MOTION: Continue on FIP  
MOVED: Euliano  
SECONDED: Blake  
ACTION: Approved

F. Institutions on Financial Show Cause

1. (15728) Bristol University, Anaheim, CA – 10 points

MOTION: The hearing panel recommends continuing the financial show-cause, and vacating the student achievement show-cause. Keep school on student achievement reporting, ask for full CAR, retention update, due July 10, 2017. Request corporate ownership chart / ownership structure disclosure.

MOVED: Edwards  
SECONDED: Fateri  
ACTION: Approved

2. +(16303) MDT College of Health and Science, Highland Heights, OH – 12 points

MOTION: The hearing panel recommends continuing the financial show-cause, vacating the student achievement show-cause, but continuing school on reporting (requesting a full year CAR through June 30, 2017, to be provided to the Council by July 10, 2017).

MOVED: Blake  
SECONDED: Guinan  
ACTION: Approved

3. \*(22447) Pinchot University, Seattle, WA – **NO SUBMISSION**

MOTION: FRC recommends revocation of the institutions accreditation, for not submitting an AFR, per Accrediting Criteria section 2-3-401 (c).

MOVED: Swartzwelder  
SECONDED: Leak  
ACTION: Approved

+denotes closure plan

\*denotes institution also has a financial adverse included in this agenda

Education Management Corporation (Financial Show-Cause directed in 04/16)

1. +(32159) The Art Institute of York – Pennsylvania, York, PA – 3 points
2. (16231) The Art Institute of Fort Lauderdale, Fort Lauderdale, FL – 6 points
3. +(10751) The Art Institutes International Minnesota, Minneapolis, MN – 13 points
4. (16235) Art Institute of New York City, New York, NY – 7 points
5. (16228) Art Institute of Phoenix, Phoenix, AZ – 0 points

MOTION: Continue Show-Cause. Conduct unannounced visits to 2-3 schools that have received complaints.

MOVED: Bennett

SECONDED: Hobdy

ACTION: Approved

G. Institutions Closed or Officially Withdrawn from ACICS Accreditation

1. (10219) Everest College, Colorado Springs, CO
2. (11314) Everest College, Newport News, VA
3. +(10678) Everest College, Portland, OR
4. +(10564) Everest College, Bremerton, WA
5. (10679) Everest University, Orlando, FL
6. (10845) Key College, Dania Beach, FL
7. (245680) SAE Institute of Technology, Nashville, TN
8. +(20950) Sanford-Brown College, Atlanta, GA
9. +(20968) Sanford-Brown College, Dallas, TX
10. (11096) Taylor Business Institute, Chicago, IL
11. (241563) Victory Trade School, Springfield, MO

MOTION: Remove from Reporting

MOVED: Bennett

SECONDED: Leak

ACTION: Approved

H. Policy Discussion Items

1. Title IV Compliance Audits

+denotes closure plan

\*denotes institution also has a financial adverse included in this agenda

II. NEW BUSINESS

A. Consent Agenda for Institutions with triggers on AFR and/or Audited Financial Statements

1. (31581) North American University, Stafford, TX – 1 point
2. (12769) Pacific States University, Los Angeles, CA—1 point
3. (20699) Santa Barbara Business College, Ventura, CA – 1 point
4. (10560) Sierra Valley College of Court Reporting, Fresno, CA – 1 point
5. (10596) Vet Tech Institute of Houston, Houston, TX – 3 points

MOTION: No Action  
MOVED: Swartzwelder  
SECONDED: Bennett  
ACTION: Approved

B. Institutions Subject to Review due to triggers on AFR and/or Audited Financial Statements

1. (24539) Bon Secours Memorial College of Nursing, Richmond, VA – 7 points
2. (10544) Cheryl Fell’s School of Business, Niagara Falls, NY – 1 point
3. +(10273) Jones College, Jacksonville, FL – 3 points
4. (15907) Texas County Technical College, Houston, MO – 4 points

MOTION: No action on items 1-3. Place item 4 on QFR.  
MOVED: Euliano  
SECONDED: Blake  
ACTION: Approved

C. Change of Ownership/Control

1. (237211) Pacific Institute of Technology, Morrow, GA

MOTION: Approve change of ownership  
MOVED: Fateri  
SECONDED: Bennett  
ACTION: Approved

D. Financial Adverse Information

1. (12400) Colorado Heights University – Line of Credit \$61,641 due to the decision to close and not seek to renew accreditation
2. (24765) Community Care College – Composite Score is 0.28
3. (10602) Empire College – Line of Credit \$392,060 due to a Composite Score of 1.0
4. AFRs due but not submitted as of 03/28/17:

+denotes closure plan

\*denotes institution also has a financial adverse included in this agenda

- a. (10418) Coleman University
  - i. Due 12/31/16; extension until 3/24 (submitted)
- b. (10431) International College of the Cayman Islands (submitted)
  - i. Due 02/28/17; extension until 3/31
- c. (22447) Pinchot University (voted on)
  - i. Due 12/31/16
  
- d. (254209) Process Work Institute
  - i. Due 01/31/17; letter sent 3/28; 2<sup>nd</sup> due date 4/4

MOTION: (Letter to school from Julie Euliano and Phone call from Roger Williams)

- e. (26129) Southern California Health Institute (SOCHI)
  - i. Due 12/31/16; 2<sup>nd</sup> due date 02/22

MOTION: No Action; AFR is in progress.

- E. Policy Discussion Items
  - 1. None

**FINANCIAL REVIEW COMMITTEE AGENDA - ADDENDUM**  
**Wednesday, April 5, 2017**  
**3:00 PM – 5:00 PM**

C. Institutions Subject to Change in Review Status – Previously QFR

II. NEW BUSINESS

B. Institutions Subject to Review due to triggers on AFR and/or Audited Financial Statements

- 5. (232604) Bethesda College of Health Sciences, Boynton Beach. FL – 6 points

MOTION: No action  
 MOVED: Swartzwelder  
 SECONDED: Leak  
 ACTION: Approved

D. Financial Adverse Information (update)

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\*denotes institution also has a financial adverse included in this agenda

(10431) International College of the Cayman Islands

- Submitted AFR on 03/30/17
- Zero points

MOTION: No Action.

Additional Late AFRs, due 03/31/17; not submitted as of 04/05/17

- (23888) Bergin University of Canine Studies, Rohnert Park, CA
- (10680) Consolidated School of Business, York, PA
- (11153) Consolidated School of Business, Lancaster, PA
- (148277) Universal Technology of Puerto Rico, Aguadilla, Puerto Rico
- (148280) Universal Technology of Puerto Rico, Camuy, Puerto Rico

MOTION: No action. Send late notice.

ADJOURNMENT

Chair Euliano adjourned the meeting at 5:31 p.m., Wednesday, April 5, 2017.

+denotes closure plan

\*denotes institution also has a financial adverse included in this agenda

**INSTITUTIONAL EFFECTIVENESS COMMITTEE**

**AGENDA**

**Tuesday, April 4, 2017**

**1:00 PM - 5:00 PM**

Committee Members

Dr. Deborah Jones, Chair  
Commissioner Rick Bennett  
Commissioner Michelle Edwards  
Commissioner Libby Guinan  
Commissioner Adriene Hobdy  
Commissioner Tibby Loveman  
Commissioner Judee Timm

Staff Liaisons

Ms. Karly Zeigler – Primary Liaison  
Ms. Niana Moore – Secondary Liaison

Other

Ms. Corrisa Barker  
Ms. LaToya Boyd  
Ms. Jan Chambers  
Mr. Steven Gelfound  
Dr. Terron King  
Ms. Cathy Kouko  
Ms. Linda Lundberg  
Ms. Katie Morrison  
Mr. Maurice Wadlington  
Ms. Perliter Walters-Gilliam

**I. CALL TO ORDER**

Chair Jones called the meeting to order at 1:04 p.m. on Tuesday, April 04, 2017.

**II. OLD BUSINESS**

1. CAR Actions Review

King

Staff King provided information on the remaining schools under programmatic student achievement review for the most current CAR retention and placement, which required Council action.

**MOTION:** To place all programs with current year retention rates below 49.9% on Show-Cause.

**MOVED:** Edwards

**SECONDED:** Loveman

**ACTION:** Passed

**MOTION:** To send a letter acknowledging teach out and current year retention and/or placement rates below Council standards, to campuses with programs in teach out, whom otherwise would be put on show-cause, compliance warning, or reporting.

**MOVED:** Edwards

**SECONDED:** Bennett

**ACTION:** Passed

**MOTION:** To place all programs with current year retention rates between 50-59.9% on compliance warning.

**MOVED:** Edwards

**SECONDED:** Bennett

**ACTION:** Passed

**MOTION:** To place all programs with current year retention rates between 60-69.9% on reporting.

**MOVED:** Edwards

**SECONDED:** Bennett

**ACTION:** Passed

**MOTION:** To place all programs with current year placement rates below 49.9% on Show-Cause, with the exception of programs from Marconi International University due to special circumstances.

**MOVED:** Edwards

**SECONDED:** Bennett

**ACTION:** Passed

**MOTION:** To place all programs with current year placement rates between 50-59.9% on compliance warning.

**MOVED:** Edwards

**SECONDED:** Bennett

**ACTION:** Passed

**MOTION:** To place all programs with current year placement rates between 60-69.9% on reporting.

**MOVED:** Edwards

**SECONDED:** Bennett

**ACTION:** Passed

## 2. Licensure Update

King

The committee proposed to review and discuss the topic of licensure requirements and actions remotely at a later date in order to have a more in depth review.

- Staff King presented information on Pioneer Pacific College concerning their recent student achievement show-cause directive. The institution indicated on their most recent two CARs that licensure was required to work in field for students graduating from the Medical Assisting -Limited X-Ray program. However, recently the institution informed the Council that this is not the case, as students are gainfully employed as medical assistants not X-ray technicians upon graduation, and licensure for this is optional.

**MOTION:** Vacate the show-cause for Pioneer Pacific College, since the Medical Assisting - Limited X-Ray program does not require a license in order for students to work in-field, and give direction that the campus must revise its 2016 CAR to reflect this.

**MOVED:** Bennett

**SECONDED:** Edwards

**ACTION:** Passed

### III. NEW BUSINESS

1. 2016 CAR Current Submission Program Actions King
  - Discussed as old business
2. Institutional Show-Cause & Withdrawal of Approval Language **IEC/4.17/1** Zeigler

**SUBJECT:** Show-Cause by Campus vs. Institution

**STAFF:** Karly Zeigler

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**ISSUE:**

Currently show-cause language refers to the actions being towards an institution and does not allow for withdrawal of approval of a branch. The language needs to be modified to reflect that an institution may be show-caused as to why one of their branches should not be subject to withdrawal of approval, rather than the entire institution being subject to withdrawal.

**NOTE:** As staff reviewed the Criteria for the proposed modifications, it was found that institution and campus are often used interchangeably throughout the Accreditation Criteria. Should this be modified throughout, or would such a change be necessary if a change were made to the glossary definition?

**OVERVIEW**

Previously, institution and campus were used interchangeably. However, in recent years, glossary definitions were added to clarify that an institution is a main and its branches or just a single stand-alone main campus. Therefore, when reference is made to an “institution” this would not include only a branch or just the main campus of a multi-campus institution. As noted above, there is a need for language in the Criteria to be consistent to show that show-cause actions may be taken towards an individual campus within an institution. Careful consideration

was made to show that accreditation cannot be withdrawn from one single campus of an institution, rather the approval of a branch campus may be withdrawn.

## **CRITERIA**

### **TITLE II GENERAL PROCEDURES**

#### **Chapter 3 Council Actions**

##### **INTRODUCTION**

When the Council has considered all of the information and reports submitted as a result of the accrediting process, it will make a judgment as to an institution's compliance with the *Accreditation Criteria*. The Council's decision is based on the extent of an institution's compliance. The judgment made is referred to as a "Council action." The actions which the Council may take are described in this chapter. Procedures available to institutions to challenge those actions and the maximum time frames for achieving final disposition of those actions by the Council also are explained. There are four general areas of Council actions: accreditation granted, accreditation deferred, accreditation denied, and accreditation withdrawn.

If the Council determines that an institution is not in compliance with the *Accreditation Criteria*, it will take prompt adverse action against the institution, or it will require the institution to take appropriate action to bring itself into compliance with the *Accreditation Criteria* within a time frame specified by the Council after the institution has been notified that it is not in compliance. That time frame will not exceed and may be less than the following:

(a) twelve months, if the longest program is less than one year in length;

(b) eighteen months, if the longest program is at least one year, but less than two years in length; and

(c) two years, if the longest program is at least two years in length.

The above time frames may be extended at the sole discretion of the Council for good cause, including evidence that there has been significant improvement in the deficient area(s) and the applicable time frame does not provide sufficient time to demonstrate full compliance, e.g., significant improvement in completion or placement rates. In no event will the good-cause extension exceed one year.

##### **2-3-100 – ACCREDITATION GRANTED**

If an institution is found to be in compliance with the *Accreditation Criteria*, ACICS may grant accreditation for a specific period of time from a minimum of one year to a maximum of six years. The length of the grant shall be at the discretion of ACICS. A grant of accreditation for less than six years is not a negative action and, therefore, is not appealable.

The Council will not grant accreditation for a full six-year term if the grant is awarded following any hearing resulting from a previous action to deny accreditation.

##### **2-3-200 – ACCREDITATION DEFERRED OR CONDITIONED**

The Council, upon review of relevant information concerning an institution, may take any of the following actions at any time in accordance with the procedures described, up to and including a final adverse action.

**2-3-210. Deferral.** When Council determines there is insufficient evidence available to make a decision, it may defer action until a later date pending receipt of additional information. In such cases, the Council will provide in writing the reasons for the deferral, state what the institution needs to provide with sufficient time for the institution to respond, and specify the response date. Based on the nature and/or number of identified deficiencies, the Council may require attendance of key administrators at a workshop and/or consultation.

Deferral is, in effect, “no action at this time” and is not a negative action. Therefore, deferral is not an appealable action. Neither is deferral a final action. In all cases of deferral on renewal of accreditation of accredited institutions, the Council will extend the present grant of accreditation for a period sufficient for the institution to provide the information needed.

**2-3-220. Compliance Warning.** When the Council determines that an institution is not in compliance with the *Accreditation Criteria*, the Council may issue a compliance warning. The institution will be provided in writing with the areas of noncompliance and will be required to demonstrate corrective action for review by ACICS.

The Council may issue a show-cause directive or a denial action as the result of reviewing a compliance warning as described in Section 2-3-230 or 2-3-402. Following receipt of a compliance warning, the institution must bring itself into compliance within the time frames specified in Title II, Chapter 3, or the institution will be subject to a final adverse action.

**2-3-230. Show-Cause Directive.** Show-cause is a status that the Council may impose on an institution-when it determines that the institution or one of the campuses within the institution does not materially operate in accordance with the *Accreditation Criteria*. The Council will provide ~~the institution with~~ a written summary of the areas of noncompliance to the institution, and ~~the institution which~~ will be required to provide evidence of corrective action for review by ACICS. Following receipt of a show-cause directive, the institution must bring itself into compliance within the time frames specified in Title II, Chapter 3, or ~~the institution~~ will be subject to an adverse action.

The issuance of a show-cause directive may be considered the basis for a hearing, at the discretion of the Council, as defined in Section 2-3-500. A suspension order or denial action may be issued by ACICS as the result of this hearing, and such action is considered a final action which may only be appealed to the Review Board of Appeals as described in Section 2-3-600. All institutions that are issued a show-cause directive by the Council will be directed to submit a school closure plan and may be required to submit a teach-out agreement as described in Section 2-2-303 of the *Accreditation Criteria*.

**2-3-231. Result of Show-Cause.** The Council will not accept any applications for new programs or new campuses from any institution on show-cause unless ~~the institution receives~~ approval is received in advance to submit such an application.

**2-3-232. Vacate Show-Cause.** If the institution demonstrates that it has addressed the Council’s concerns and is operating in compliance with the *Accreditation Criteria*, then ACICS may vacate the show-cause. The Council may also order a special visit at the institution’s expense before vacating the show-cause.

**2-3-233. Notification of Show-Cause.** The Council will notify the U.S. Secretary of Education, appropriate state regulatory agencies, other appropriate accrediting agencies, and the public of its decision to place an institution on show-cause. The institution is required to notify immediately its current and prospective students along with the public of its show-cause status through appropriate means, including posting a prominent notice on its website.

### **2-3-300 – ACCREDITATION DENIED**

Denial of an accredited status is characterized by the Council as a “withholding” action and is differentiated from suspension of accreditation, which is a “withdrawal” action. There are two levels of denial. One totally withholds accreditation of the institution or a branch; the other denies approval of a requested substantive change. Denial at either level constitutes a negative action and is challengeable by the institution. The process of challenge, however, is different for each level of denial as separately described in Sections 2-3-301, 2-3-302, and 2-3-303. In all cases of denial, the Council will give the institution written reasons for the denial, which are subject to modification through the appeals processes as later described and explained. Denial actions that are not appealed in accordance with the appeals procedures provided by the Council are considered final actions.

### **2-3-400 – ACCREDITATION WITHDRAWN**

“Withdrawal of accreditation” differs from “denial of accreditation” in that denial rejects an institution’s application for an initial grant of accreditation or for a renewal of accreditation to take effect upon the expiration of an existing grant of accreditation; withdrawal of accreditation takes away a current grant of accreditation before its expiration. Accreditation may be withdrawn from an institution or inclusion withdrawn from a branch campus through two types of Council action: “revocation of accreditation” or “suspension of accreditation.”

**2-3-401. Revocation.** Revocation occurs without a hearing for any of the following reasons:

- (a) An institution notifies the Council that it has closed and/or ceased operation.
- (b) An institution/campus whose accreditation has been summarily suspended does not challenge the suspension within 10 days of receipt of the suspension notice. (See Section 2-2-301.)
- (c) The institution/campus fails to file an annual report as required by the Council. (See Sections 2-1-801-2-1-802.)
- (d) The institution/campus fails to pay its annual fees, application fees, other assessed fees, or evaluation expenses. (See Section 2-1-804.)

A revocation action is not appealable. It requires an institution to start anew and to undergo the entire accreditation process to regain accreditation.

**2-3-402. Suspension.** Suspension of accreditation may occur when, in the judgment of ACICS, an institution or one of the campuses within the institution no longer complies with the criteria. By way of illustration, ACICS might issue an order of suspension for reasons such as the following:

- (a) The institution or any of its components (a branch or new program, for example), is evaluated as directed by ACICS and is determined not to be in compliance with the criteria.

- (b) Periodic required reports filed by the institution/campus fail to conform to Council reporting requirements.
- (c) The institution/campus makes substantial or significant change, without notice to ACICS, in its operation, structure, governance, ownership, control, location, facilities, or programs of study.
- (d) The institution/campus fails to respond to or cooperate with attempts by the Council to make arrangements for a site evaluation.
- (e) The institution/campus has deviated from the criteria or other directives of ACICS.
- (f) The institution fails to disclose any agreements, options, or other contractual arrangements between the institution and other parties which bear on the management or control of the main campus or its nonmain campuses.

In all cases of suspension, the Council retains discretion to specify whether and under what conditions the institution might apply for an initial grant of accreditation or inclusion of a branch campus.

**2-3-403. Procedural Guarantees for Withdrawal by Suspension.** In all cases where accreditation is subject to withdrawal by suspension under Section 2-3-402, the institution is afforded the following procedural guarantees:

- (a) Opportunity for a hearing before ACICS on all material issues in controversy.
- (b) Written prior notice of the proceedings, the charges levied, and the standards by which the institution/campus ultimately is to be judged.
- (c) A decision on the record alone and a statement of reasons for the ultimate decision.
- (d) A right of appeal as provided in Section 2-3-600.
- (e) If the Review Board of Appeals affirms the withdrawal of accreditation by way of suspension, the appeal shall be deemed to be finally disposed of upon issuance of the decision and publication will be made as described in Section 2-3-607.

## **OPTIONS**

1. Vote to approve the proposed policy presented below and publish it in the Memorandum to the Field.
2. Vote to approve the proposed policy with amendments shown below and publish it in the Memorandum to the Field:
3. Recommend a different approach to policy issue as stated below:
4. Remove from further consideration.

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**RECOMMENDATION:** Option 1

**MOVED:** Commissioner Bennett moved to accept option 1 as proposed

**SECONDED:** Commissioner Hobby moved to second the motion

**ACTION:** Passed

2. Revocation IEC/4.17/2

Morrison

**SUBJECT:** Revocation for Failure to Respond to Show-Cause Directive

**STAFF:** Katie Morrison

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**ISSUE/OBJECTIVE:**

The *Criteria* does not currently outline a consequential action to be taken for an institution that does not respond to a show-cause directive. It has also been discussed that the *Criteria* should allow for withdrawal actions to be taken at the campus-level, instead of the institution-level.

**CRITERIA**

**2-3-400 – ACCREDITATION WITHDRAWN**

“Withdrawal of accreditation” differs from “denial of accreditation” in that denial rejects an institution’s application for an initial grant of accreditation or for a renewal of accreditation to take effect upon the expiration of an existing grant of accreditation; withdrawal of accreditation takes away a current grant of accreditation before its expiration. Accreditation may be withdrawn from an institution or campus through two types of Council action: “revocation of accreditation” or “suspension of accreditation.”

**2-3-401. Revocation.** Revocation occurs without a hearing for any of the following reasons:

- (a) An institution or campus notifies the Council that it has closed and/or ceased operation.
- (b) An institution fails to submit a written response to a show-cause directive by the indicated due date.
- (c) ~~(b)~~ An institution or campus whose accreditation has been summarily suspended does not challenge the suspension within 10 days of receipt of the suspension notice. (See Section 2-2-301.)
- (d) ~~(e)~~ The institution or campus fails to file an annual report as required by the Council. (See Sections 2-1-801 – 2-1-802.)
- (e) ~~(d)~~ The institution or campus fails to pay its annual fees, application fees, other assessed fees, or evaluation expenses. (See Section 2-1-804.)

A revocation action is not appealable. It requires an institution to start anew and to undergo the entire accreditation process to regain accreditation.

**OPTIONS**

- 1. Vote to approve the proposed policy presented below and publish it in the Memorandum to the Field.
  
- 2. Vote to approve the proposed policy with amendments shown below and publish it in the Memorandum to the Field:

3. Recommend a different approach to policy issue as stated below:
4. Remove from further consideration.

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**RECOMMENDATION:** Option 1

**MOVED:** Commissioner Bennett moved to accept option 1 as proposed

**SECONDED:** Commissioner Hobby moved to second the motion

**ACTION:** Passed

3. Student Achievement Procedures (Appendix L) **IEC/4.17/3** Walters-Gilliam/Zeigler

**SUBJECT:** Revision to Student Achievement Standards & Guidelines and Procedural Guarantees

**CONSIDERATION:** Proposed

**STAFF:** Perliter Walters-Gilliam

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**ISSUE/OBJECTIVE:** The standards and guidelines recently implemented to evaluate and take action on student achievement outcomes – retention, placement, and licensure examination pass rates, where applicable – require additional consideration and revision by the Council to ensure consistency with other Council Actions already outlined in the Criteria while providing institutions with clarity on its expectations with each enforced action.

In addition to Appendix L, two sections of the Criteria were also considered for revision since the details were either already in Appendix L or needed to be, as they referred specifically to the guidelines. A change to the procedural guarantees for withdrawals by suspension was also considered and a revision made.

The proposed changes are identified below with additions underlined and deletions with ~~strike through~~.

**CRITERIA**

**2-1-809. Student Achievement Review.** The Council reviews the Campus Accountability Report (CAR) to monitor performance in terms of student achievement at both the campus and program levels. Measures will include retention, placement, and licensure examination pass rates, if applicable. When this review indicates that that the achievement of an institution's students is below benchmark, the Council will take action consistent with the guidelines outlined in Appendix L, Student Achievement Standards and Campus Accountability Reports. ~~place the campus or program on reporting and require the institution to add an Improvement Plan within its Campus Effectiveness Plan (CEP). If the Council determines the institution no longer~~

~~complies with the Council's requirement for student achievement, the Council will issue a compliance warning or a show-cause directive, or otherwise take action and require the institution to demonstrate compliance within the time frames described in Title II, Chapter 3. If the Council deems an institution significantly out of compliance relative to student achievement outcomes with little or no chance of coming into compliance, then it will take an adverse action. Those with campus- or program-level plans are subject to additional reporting requirements, and additional restrictions may be imposed upon those that are out of compliance.~~

**2-2-502. Program Show-Cause or Compliance Warning.** When the Council determines that a program at a campus of the institution has fallen below the compliance standard for retention, placement, or licensure examination pass rates, the institution will be provided in writing with a show-cause directive or compliance warning regarding the alleged deficiency in accordance with the guidelines outlined in Appendix L, Student Achievement Standards and Campus Accountability Reports. ~~The show-cause or compliance warning will note that the program will have to come into compliance by meeting or exceeding the program-level standard prior to the expiration of the established time frame or be taught out and discontinued or otherwise conditioned.~~

~~A program show-cause or compliance warning is not a negative or conditioning action and is therefore not appealable. Rather, it is issued as an official notification to an institution that a program provided by the institution is out of compliance with agency standards. Following receipt of a program show-cause or compliance warning, the institution must bring itself into compliance within the time frames specified in Title II, Chapter 3, and Appendix L, or the institution will be subject to adverse action in the form of withdrawal of approval for inclusion of the program within the institution's grant of accreditation as described in Section 2-2-503.~~

~~A program that is placed on show-cause status is required to notify its current and prospective students along with the public immediately and in writing of its show-cause status through appropriate means.~~

## **Appendix L      Student Achievement Standards and Campus Accountability Reports**

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### **INTRODUCTION**

ACICS defines academic quality in terms of the extent to which an accredited institution achieves its intended student learning and student success outcomes. Student learning outcomes involve assessment of skill and competency attainment, including licensure examination pass rates, where applicable. Student success outcomes include student retention or persistence and employment or placement.

Section 2-1-809 of the *Accreditation Criteria* requires periodic Council review of student achievement data, verified both by the institution as well as by the Council, submitted by the campus in the annual Campus Accountability Report (CAR) as required under Section 2-1-801.

Appendix L provides an overview of the Council’s student achievement standards and Council actions that will be taken if the student achievement data show that a campus or program is out of compliance with these standards.

**STUDENT ACHIEVEMENT EXPECTATIONS**

Student achievement standards outlined below apply to retention and placement rates at the campus and program levels, and licensure examination pass rates, where applicable, at the program level. Minimum standards are intended to ensure that a substantial majority of students at ACICS-accredited campuses are retained, pass licensure examinations where applicable, and find appropriate employment.

<b>Campus-Level Student Achievement Elements (Effective 2013 Reporting Year)</b>	<b>Standard</b>	<b>Benchmark*</b>
Retention Rate	<b>60%</b>	<b>70%</b>
Placement Rate	<b>60%</b>	<b>70%</b>
<b>Program-Level Student Achievement Elements (Effective 2013 Reporting Year)</b>	<b>Standard</b>	<b>Benchmark*</b>
Retention Rate		
• Program length equal to or less than one (1) year	<b>60%</b>	<b>70%</b>
• Program length equal to or more than one (1) year	<b>60%</b>	<b>65%</b>
Placement Rate	<b>60%</b>	<b>70%</b>
Licensure Examination Pass Rates, where applicable**	<b>60%</b>	<b>70%</b>

*\*A campus and/or program whose rates fall below Benchmark must develop and implement an improvement plan.*

*\*\* Licensure examination pass rates standards apply where a licensure is required for employment—to programs for which licensure or certification is required to practice in the specific career field. The program is ~~also~~ required to meet ~~applicable~~ licensure agency standards if higher rates are required any higher licensure agency standards.*

**DATA COLLECTION AND VERIFICATION OF DATA INTEGRITY**

As required under Standard 2-1-801, each main campus and each branch campus must submit an annual Campus Accountability Report (CAR). These reports are due on or before November 1 annually. The CAR reporting year is July 1 to June 30. Placement is accepted through November 1 of the CAR reporting year. Based on the student-by-student data submitted by the campus, the Council calculates the various student achievement rates. All data reported to ACICS for any purpose is expected to reflect an accurate and verifiable portrayal of institutional performance

and is subject to review for integrity, accuracy, and completeness (see Standard 3-1-203). In addition to the Council review of data on an annual basis, placement information is reviewed via monthly submissions, and all CAR data is subject to review and verification at any time, including during an on-site evaluation visit.

**STUDENT ACHIEVEMENT REVIEW AND COUNCIL ACTIONS**

The Council reviews student achievement data for each campus on an annual basis and takes appropriate action. The Council reserves the right to take immediate adverse action once a campus and/or program is found out of compliance and will exercise its judgment in applying the guidelines outlined below: ~~The Council will follow the guidelines listed below:~~

Year Reporting	Rates	Campus and/or Program <sup>^</sup> Status <sup>**</sup>	Council Directed Activities
Current Submission	60-69.9%	Reporting	<ul style="list-style-type: none"> <li>• <u>Development and Implementation of an Improvement Plan (IP) and inclusion into the Campus Effectiveness Plan (CEP) (campus and/or program level)</u></li> <li>• <u>Attendance at ACICS’s Retention and Placement Workshop (campus level)</u></li> </ul>
	50-59.9%	Compliance Warning	<ul style="list-style-type: none"> <li>• <u>Institutional review before the Council (Campus-Level)</u></li> <li>• <u>Development and Implementation of an Improvement Plan (IP) and inclusion into the Campus Effectiveness Plan (CEP) (campus- and/or program- level)</u></li> <li>• <u>Submission of a partial Campus Accountability Report (CAR) which includes backup documentation to support the rate(s) reported for the specified period and backup documentation of the activities occurring between July 1 and December 31 (campus and/or program-level)</u></li> <li>• <u>Submission of all communication and reporting with the oversight agency on licensure performance (program-level licensure)</u></li> <li>• <u>Submission of updated licensure information as provided by the oversight agency, or a reliable third-party, or as collected and compiled by the campus with supporting backup documentation (program-level licensure)</u></li> </ul>

Year Reporting	Rates	Campus and/or Program^ Status**	Council Directed Activities
	Below 49.9%	Show-Cause	<ul style="list-style-type: none"> <li>• <u>Institutional review before the Council</u></li> <li>• <u>Submission of Submit evidence of a corrective action plan to the Council along with documentation of implementation and effectiveness (campus and/or program-level)</u></li> <li>• <u>Submission of a mid-year partial Campus Accountability Report (CAR) which includes backup documentation to support the rate(s) reported for the specified period and backup documentation of the activities occurring between July 1 and December 31 (campus and/or program level)</u></li> <li>• <u>Notification of its status to its current and prospective students on its website, internal student communication system, and appropriate admissions forms and reference materials (campus- and/or program-level)</u></li> <li>• <u>Submission of a prepared campus closure plan and/or program termination plan that includes an audit of students currently enrolled along with a plan for teach out (campus- and/or program- level)</u></li> <li>• <u>Submission of all communication and reporting with the oversight agency on licensure performance (program-level licensure)</u></li> <li>• <u>Submission of updated licensure information as provided by the oversight agency, or a reliable third- party, or as collected and compiled by the campus with supporting back up documentation (program-level licensure)</u></li> </ul>
	*	Adverse Action	<ul style="list-style-type: none"> <li>• <u>Implement an ACICS approved Submission of a Campus Closure Application with a teach-out plan and agreements, if applicable (campus and program-level)</u></li> <li>• <u>Institutional review before the Council Appealable to the Review Board of Appeals (campus- and/or program-</u></li> </ul>

Year Reporting	Rates	Campus and/or Program^ Status**	Council Directed Activities
			<p><i>level)</i></p> <ul style="list-style-type: none"> <li>• <u>Submission of a Program Termination Application with teach-out or transfer-out agreements for ACICS approval (program level)</u></li> <li>• <u>Immediate cessation of new enrollment (program level)</u></li> </ul>
Following Year 1	50-59.9%	Show-Cause	<ul style="list-style-type: none"> <li>• <u>Institutional review before the Council</u></li> <li>• <u>Submission of Submit evidence of a corrective action plan to the Council along with documentation of implementation and effectiveness (campus and/or program-level)</u></li> <li>• <u>Submission of a mid-year partial Campus Accountability Report (CAR) which includes backup documentation to support the rate(s) reported for the specified period and backup documentation of the activities occurring between July 1 and December 31 (campus and/or program level)</u></li> <li>• <u>Notification of its status to its current and prospective students on its website, internal student communication system, and appropriate admissions forms and reference materials (campus- and/or program-level)</u></li> <li>• <u>Submission of a prepared campus closure plan and/or program termination plan that includes an audit of students currently enrolled along with a plan for teach out (campus- and/or program-level)</u></li> <li>• <u>Submission of all communication and reporting with the oversight agency on licensure performance (program-level licensure)</u></li> <li>• <u>Submission of updated licensure information as provided by the oversight agency, or a reliable third-party, or as collected and compiled by the campus with supporting back up documentation (program-level licensure)</u></li> </ul>

Year Reporting	Rates	Campus and/or Program <sup>^</sup> Status <sup>**</sup>	Council Directed Activities
	<b>Below 459.9%</b>	<b>Adverse Action</b>	<ul style="list-style-type: none"> <li>• Attendance at ACICS's Retention and Placement Workshop (<i>campus-level</i>)</li> <li>• Implement an ACICS approved <u>Submission of a Campus Closure Application</u> with a teach-out plan and agreements, if applicable (<i>campus and-program-level</i>)</li> <li>• <u>Institutional review before the Council Appealable to the Review Board of Appeals</u> (<i>campus- and/or program-level</i>)</li> <li>• <u>Submission of a Program Termination Application with teach-out or transfer-out agreements for ACICS approval</u> (<i>program level</i>)</li> <li>• <u>Immediate cessation of new enrollment</u> (<i>program level</i>)</li> </ul>
<b>Following Year 2</b>	<b>Below 59.9%</b>	<b>Adverse Action</b>	<ul style="list-style-type: none"> <li>• Implement an ACICS approved <u>Submission of a Campus Closure Application</u> with a teach-out plan and agreements, if applicable (<i>campus and-program-level</i>)</li> <li>• <u>Institutional review before the Council Appealable to the Review Board of Appeals</u> (<i>campus- and/or program-level</i>)</li> <li>• <u>Submission of a Program Termination Application with teach-out or transfer-out agreements for ACICS approval</u> (<i>program level</i>)</li> <li>• <u>Immediate cessation of new enrollment</u> (<i>program level</i>)</li> </ul>

*\*If the Council deems an institution or **an individual** program significantly out of compliance relative to student achievement outcomes with little or no chance of coming into compliance within the maximum time frame, it will take an adverse action. **In the event that** the Council **finds an institution or an individual program to be out of compliance at a level that, in its judgement, determines that the institution or program can come into compliance can be remedied within a period of time not to exceed the- maximum time frames specified in Title II, Chapter 3, Introduction, in a reasonable period of time**, it will take action appropriate to the circumstances such as compliance warning or show-cause directive.*

***\*\*For any campus institution or program that receives a compliance warning or show-cause directive, the institution must bring-itself-come into compliance within a period of time not to exceed the maximum time frames specified in Title II, Chapter 3, Introduction (i.e. an institution whose longest program is less than one year in length has a time frame of twelve months to come into compliance).***

***^ A program show-cause directive or compliance warning is not an adverse action and is therefore not appealable. It is issued as an official notification to an institution that a program provided by the institution is out of compliance with agency standards. Following receipt of a program show-cause or compliance warning, the institution must bring-itself-into compliance within the time frames specified in Title II, Chapter 3, and Appendix L, or the institution will be subject to adverse action in the form of withdrawal of approval for inclusion of the program within the institution's grant of accreditation as described in Section 2-2-503.***

#### DESCRIPTION OF STUDENT ACHIEVEMENT REVIEW ACTIONS

***Immediate Adverse Action:*** The Council reserves the right to take immediate adverse action if the institution or one of its campuses is significantly out of compliance with the Council standards with little or no chance of coming into compliance within the maximum time frame. An adverse action for an institution campus is a withdrawal by suspension of the institution's accreditation, or withdrawal of inclusion of the branch campus's approval within the accredited status of the institution. An adverse action for a program is the withdrawal of that program's approval termination of the program, except for teach-out purposes for the currently enrolled students. An institution, in accordance with Section 2-3-403(a), will be allowed the opportunity for a review before the Council hearing prior to the issuance execution of a withdrawal by suspension an adverse action.

***Withdrawal by Suspension or Termination of a*** If an institution or one of its campuses does not come into compliance within the time frames specified for by compliance warning or show-cause directive, the Council, then the Council will issue then they will issue a withdrawal by suspension of the institution's accreditation, or withdrawal of inclusion of the branch campus's approval within the accredited status of the institution. In cases where an immediate adverse action is warranted on a campus, an intent to show-cause will be issued to allow for a review before the Council.

***Withdrawal of Program Approval:*** If a program does not come into compliance within the time frames specified by the Council, then a withdrawal of program approval will be issued and the institution will be required to immediately cease new enrollments and terminate the program. Due to the limited nature and narrow scope of the withdrawal of program approval, the appeal to the Council may be in writing only and is not appealable to the review board. If a program does not come into compliance within the time frames specified for compliance warning or show-cause, it will be required to cease enrollment and terminate the program of study.

***Show-Cause:*** The Council will issue a show-cause directive against any campus or program that is materially below the Council standard, as defined as below 50% for any student achievement

~~indicator in its current submission.~~ The show-cause directive is an action by which the Council determines that the campus and/or program is materially out of compliance and provides the institution an opportunity for a review before the Council concerning the deficiencies identified. The campus must submit evidence, to the Council, of the corrective actions planned and implemented to improve performance and come into compliance. Further, the campus must prepare a campus closure and/or program termination plan. In addition, the campus and/or program must provide notification of its status to all current and prospective students. If the show-cause directive is as a result of licensure examination pass rate performance, the campus must also provide updated pass rate information and all communication from the oversight agency concerning the monitoring of its performance. As a result of being found out of compliance, the campus and/or program will have one year to bring themselves come into compliance with the applicable standard.

***Compliance Warning:*** ~~Following the CAR submission if a campus and/or program reports student achievement retention or placement rates or program-level licensure examination pass rates between 50-60%, the Council will issue a compliance warning, and the campus and/or program will be found out of compliance.~~ A campus and/or program on compliance warning is required to evaluate, analyze, and if necessary, revise the Improvement Plan implemented while on student achievement reporting. The Council reserves the right to request the submission of the evaluation and analysis of the Improvement Plan for Council review. The campus will be given the opportunity for a review before the Council to provide evidence of improvement at the campus and/or program levels. As a result of being found out of compliance, the campus and/or program must come in to compliance within a period of time not to exceed the maximum time frames specified in Title II, Chapter 3, Introduction.

***Reporting:*** ~~Following the CAR submission if~~ If a campus and/or program reports student achievement retention or placement rates or program-level licensure examination pass rates between 60-70%, it is considered on student achievement ~~review and~~ reporting. The campus and/or program is required to show improvement and must develop and implement an Improvement Plan that is fully incorporated into the Campus Effectiveness Plan (CEP). The Improvement Plan must identify the factors negatively impacting the student achievement outcome, the specific activities to be implemented or being implemented to address the deficiency, and an analysis of any changes realized since its implementation. ~~include the required elements and~~ This plan will may be reviewed during any on-site evaluation visit. ~~In addition, those campuses must attend an ACICS Retention and/or Placement Workshop.~~

***Data Collection and Verification:*** ACICS standards are applied by the Council to data collected from each main and branch campus through the annual Campus Accountability Report (CAR). The Council reviews campus- and program-level retention and placement rates and program-level licensure examination pass rates where licensure is required for employment in the state where the campus is located. The CAR reporting year is July 1 to June 30, and placement is accepted through November 1 of the CAR reporting year.

***Please refer to Campus Accountability Report (CAR) Guidelines and Instructions for details regarding online submission of the annual report, instructions, types of information collected, and calculation formulas.***

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**2-3-403. Procedural Guarantees for Withdrawal by Suspension.** In all cases where accreditation is subject to withdrawal by suspension under Section 2-3-402, the institution is afforded the following procedural guarantees:

- (a) Opportunity for a review or hearing before ACICS on all material issues in controversy.
- (b) Written prior notice of the proceedings, the charges levied, and the standards by which the institution ultimately is to be judged
- (c) A decision on the record alone and a statement of reasons for the ultimate decision.
- (d) A right of appeal as provided in Section 2-3-600.
- (e) If the Review Board of Appeals affirms the withdrawal of accreditation by way of suspension, the appeal shall be deemed to be finally disposed of upon issuance of the decision and publication will be made as described in Section 2-3-607.

#### **OPTIONS**

5. Vote to approve as proposed and publish it in the Memorandum to the Field.
6. Vote to amend the policy and bring before the Council in August:
7. Recommend a different approach to policy issue as stated below:
8. Remove from further consideration.

**MOVED:** Commissioner Bennett moved to accept option 1 as amended

**SECONDED:** Commissioner Hobdy moved to second the motion

**ACTION:** Passed

**Amendment guidance:** Amend the language in the appendix L chart under current submission compliance warning to only include Council directed activities at the campus level.

#### **FUTURE AGENDA**

##### 4. Quarterly CAR

Gelfound

- Staff Gelfound initiated discussion about moving forward with implementing a quarterly CAR. The committee requested a draft of the communication that will be sent to schools explaining the parameters of the quarterly CAR. The committee asked that this communication be presented for discussion to full Council.

Chair Jones adjourned the meeting at 3:01 p.m. on Tuesday, April 4, 2017

**MOTION:** Bennett

**SECONDED:** Edwards

A	Leak	00010363	MAIN	Brightwood College, Hammond, IN	Morrison, Katie	NG	7	1	12/31/2016	03	Approval
C	Timm	00221316	AL	Virginia College, Lubbock, TX	Wadlington, Maurice	DE<50%	16	0	12/31/2021	03	Approval
A	Leak	00010596	MAIN	Vet Tech Institute of Houston, Houston, TX	Moore, Niana	NG	7	1	12/31/2016	03	Approval
B	Thomas	00020562	B	Everest College, Tacoma, WA	Kouko, Cathy	NG	7	1	12/31/2016	03	Approval
C	Fateri	00168008	B	Spartan College of Aeronautics and Technology, Westminster, CO	Morrison, Katie	QAM-CO	14	1	12/31/2018	02	Approval
C	Fateri	00027075	MAIN	Spartan College of Aeronautics and Technology, Broomfield, CO	Morrison, Katie	QAM-CO	14	1	12/31/2018	02	Approval
A	Leak	00032150	AL	Art Institute of Salt Lake City, Draper, UT	Wadlington, Maurice	UA	10	2	12/31/2017	04	Approval
C	Bennett	00020292	MAIN	California International Business University, San Diego, CA	Strout, Joyce	NG	7	1	12/31/2017	06	Approval
A	Leak	00267207	MAIN	Healing Hands Institute, Miami, FL	Wadlington, Maurice	IG	4	1	N/A		Approval
A	Swartzwelder	00060414	AL	Laurus College, Oxnard, CA	Bennett, Anne	QAM-HC	12	0	12/31/2017	001	Approval
C	Timm	00245831	MAIN	International College of Health Sciences, Boynton Beach, FL	Sellers, Kathryn	NG	7	1	12/31/2017	04	Approval
A	Swartzwelder	00060414	AL	Laurus College, Oxnard, CA	Bennett, Anne	QAM-HC	12	0	12/31/2017	001	Approval
A	Swartzwelder	00060414	AL	Laurus College, Oxnard, CA	Bennett, Anne	QAM-HC	12	0	12/31/2017	001	Approval
A	Swartzwelder	00060414	AL	Laurus College, Oxnard, CA	Bennett, Anne	QAM-HC	12	0	12/31/2017	001	Approval
A	Swartzwelder	00060414	AL	Laurus College, Oxnard, CA	Bennett, Anne	QAM-HC	12	0	12/31/2017	001	Approval
A	Swartzwelder	00023501	MAIN	Laurus College, San Luis Obispo, CA	Bennett, Anne	QAM-HC	12	0	12/31/2017	01	Approval
A	Edwards	00171290	MAIN	Niels Brock Copenhagen Business College, Copenhagen K, Denmark	Zeigler, Karly	NG	7	1	12/31/2016	03	Approval
A	Swartzwelder	00023501	MAIN	Laurus College, San Luis Obispo, CA	Bennett, Anne	QAM-HC	12	0	12/31/2017	01	Approval
A	Swartzwelder	00023501	MAIN	Laurus College, San Luis Obispo, CA	Bennett, Anne	QAM-HC	12	0	12/31/2017	01	Approval
A	Swartzwelder	00023501	MAIN	Laurus College, San Luis Obispo, CA	Bennett, Anne	QAM-HC	12	0	12/31/2017	01	Approval
A	Swartzwelder	00023501	MAIN	Laurus College, San Luis Obispo, CA	Bennett, Anne	QAM-HC	12	0	12/31/2017	01	Approval
B	Ramirez-Rivera	00024852	MAIN	Peloton College, Dallas, TX	Wadlington, Maurice	QAM-HC	12	1	12/31/2019	03	Approval
A	Edwards	00228584	MAIN	University of North America, Vienna, VA	Boyd, LaToya	NG	7	6	12/31/2017	05	Approval
B	Ramirez-Rivera	00024852	MAIN	Peloton College, Dallas, TX	Wadlington, Maurice	QAM-HC	12	1	12/31/2019	03	Approval
A	Swartzwelder	00060414	AL	Laurus College, Oxnard, CA	Bennett, Anne	NG	7	6	12/31/2017	001	Approval
A	Swartzwelder	00023501	MAIN	Laurus College, San Luis Obispo, CA	Bennett, Anne	NG	7	7	12/31/2017	01	Approval
B	Jones	00275488	MAIN	BAU International University, Washington, DC	Boyd, LaToya	IG	4	3	N/A		Approval
B	Ramirez-Rivera	00025097	MAIN	PITC Institute, Wyncote, PA	Moore, Niana	NG	7	3	12/31/2016	01	Approval
C	Timm	00010128	MAIN	Bryan University, Topeka, KS	Morrison, Katie	NG	7	1	12/31/2016	03	Approval
B	Hobdy	00010696	MAIN	Hunter Business School, Levittown, NY	Boyd, LaToya	NG	7	1	12/31/2016	01	Approval
B	Ramirez-Rivera	00259084	MAIN	American Institute of Healthcare & Technology, Stratford, CT	Wadlington, Maurice	IG	4	2	N/A		Approval
B	Ramirez-Rivera	00010934	MAIN	Fortis Institute, Erie, PA	Boyd, LaToya	SP	10	2	12/31/2017	02	Approval
B	Ramirez-Rivera	00029269	AL	McCann School of Business & Technology, Carlisle, PA	Kouko, Cathy	UA	10	1	05/31/2018	02	Approval
B	Ramirez-Rivera	00020097	AL	McCann School of Business & Technology, Dickson City, PA	Kouko, Cathy	UA	10	1	05/31/2018	02	Approval
B	Ramirez-Rivera	00010254	AL	Miami-Jacobs Career College, Dayton, OH	Wadlington, Maurice	UA	10	1	05/31/2018	02	Approval
B	Ramirez-Rivera	00022116	AL	Miami-Jacobs Career College, Springboro, OH	Sellers, Kathryn	UA	10	1	05/31/2018	02	Approval
B	Ramirez-Rivera	00023417	AL	Miami-Jacobs Career College, Troy, OH	Sellers, Kathryn	UA	10	1	05/31/2018	02	Approval
B	Ramirez-Rivera	00048170	AL	Miller-Motte Technical College, Gulfport, MS	Sellers, Kathryn	UA	10	1	05/31/2018	02	Approval
B	Ramirez-Rivera	00024852	MAIN	Peloton College, Dallas, TX	Wadlington, Maurice	QAM-HC	12	1	12/31/2019	03	Approval
C	Loveman	00103319	MAIN	Texas Health and Science University, Austin, TX	Wadlington, Maurice	QAM-HC	12	2	12/31/2019	06	Approval
C	Timm	00245831	MAIN	International College of Health Sciences, Boynton Beach, FL	Sellers, Kathryn	QAM-HC	12	0	12/31/2017	04	Approval
B	Hobdy	00022604	B	Hunter Business School, Medford, NY	Boyd, LaToya	NG	7	2	12/31/2016	01	Approval
B	Jones	00023525	B	National College, Bartlett, TN	Wadlington, Maurice	NG/SP	7	10	12/31/2016	02	Approval
C	Bennett	00020207	MAIN	American University of Health Sciences, Signal Hill, CA	Morrison, Katie	NG	7	1	12/31/2016	05	Approval
C	Loveman	00024346	MAIN	Sentara College of Health Sciences, Chesapeake, VA	Boyd, LaToya	NG	7	3	12/31/2016	04	Approval
A	Blake	00011303	MAIN	Ridley-Lowell Business & Technical Inst., New London, CT	Wadlington, Maurice	QAM-OS	13	1	12/31/2016	01	Approval
A	Leak	00032209	AL	Art Institute of Las Vegas, Henderson, NV	Moore, Niana	QAM-OS	13	0	12/31/2017	04	Approval
A	Leak	00032209	AL	Art Institute of Las Vegas, Henderson, NV	Moore, Niana	QAM-OS	13	0	12/31/2017	04	Approval
A	Leak	00010838	MAIN	Laurel Technical Institute, Sharon, PA	Bennett, Anne	QAM-OS	13	1	12/31/2020	02	Approval
C	Loveman	00068978	MAIN	Columbia College, Vienna, VA	Chambers, Jan	SP	10	1	12/31/2019	03	Approval
A	Blake	00269949	AL	Gwinnett Institute, Orlando, FL	Boyd, LaToya	NG	7	0	12/31/2019	04	Approval
B	Guinan	00010725	AL	American National University, Pikeville, KY	Strout, Joyce	QAM-OS	13	0	12/31/2017	03	Approval
C	Timm	00020978	B	American Educational College, Vega Alta, PR	Walters-Gilliam, Perliter	SP	10	1	12/31/2017	01	Approval
C	Timm	00011239	AL	Brown Mackie College - Akron, Akron, OH	Moore, Moore, Niana	UA	10	1	12/31/2017	03	Approval
C	Timm	00020239	AL	Brown Mackie College - Atlanta, Atlanta, GA	Kouko, Cathy	UA	10	1	12/31/2017	03	Approval
C	Timm	00010572	AL	Brown Mackie College - Cincinnati, Cincinnati, OH	Kouko, Cathy	UA	10	2	12/31/2017	03	Approval
C	Timm	00010165	AL	Brown Mackie College - Findlay, Findlay, OH	Moore, Moore, Niana	UA	10	0	12/31/2017	03	Approval
C	Timm	00010218	AL	Brown Mackie College - Fort Wayne, IN	Boyd, LaToya	UA	10	0	12/31/2017	04	Approval
C	Timm	00024800	AL	Brown Mackie College - Greenville, Greenville, SC	Boyd, LaToya	UA	10	1	12/31/2017	04	Approval
C	Timm	00023533	AL	Brown Mackie College - Indianapolis, Indianapolis, IN	Kouko, Cathy	UA	10	1	12/31/2017	04	Approval

C	Timm	00020244	AL	Brown Mackie College - Louisville, Louisville, KY	Moore, Moore, Niana	UA	10	1	12/31/2017	04	Approval
C	Timm	00041546	AL	Brown Mackie College - San Antonio, San Antonio, TX	Wadlington, Maurice	UA	10	1	12/31/2017	04	Approval
C	Timm	00010695	AL	Brown Mackie College - South Bend, South Bend, IN	Moore, Moore, Niana	UA	10	2	12/31/2017	04	Approval
C	Timm	00029631	AL	Brown Mackie College - St. Louis, Fenton, MO	Boyd, LaToya	UA	10	0	12/31/2017	04	Approval
C	Timm	00011136	AL	Brown Mackie College - Tucson, Tucson, AZ	Wadlington, Maurice	UA	10	1	12/31/2017	04	Approval
C	Timm	00024239	AL	Brown Mackie College - Tulsa, Tulsa, OK	Wadlington, Maurice	UA	10	1	12/31/2017	04	Approval
B	Jones	00011107	MAIN	Elmira Business Institute, Elmira, NY	Kouko, Cathy/Morrison, Katie	NG	7	5	12/31/2016	02	Approval
B	Jones	00020757	B	Elmira Business Institute, Vestal, NY	Kouko, Cathy/Morrison, Katie	NG	7	5	12/31/2016	02	Approval
C	Fateri	00240580	B	Nobel University - Buena Park, Buena Park, CA	Morrison, Katie	QAM-RV	15	1	12/31/2018	04	Approval
C	Timm	00011099	B	Bryan University, Los Angeles, CA	Boyd, LaToya	NG	7	6	12/31/2016	05	Approval
C	Fateri	00019411	MAIN	Strafford University, Falls Church, VA	Kouko, Cathy	QAM-RV	15	3	12/31/2019	05	Approval
IEC	Hobdy	00020271	MAIN	Court Reporting Institute of St. Louis, Clayton, MO		Hearing-WS	1		12/31/2017	02	Closed
A	Blake	00033448	B	Ridley-Lowell Business & Technical Institute, Danbury, CT	Wadlington, Maurice	NG	5	7	12/31/2016	01	Compliance Warning
A	Euliano	00015527	MAIN	Northwestern Polytechnic University, Fremont, CA	Kouko, Cathy	UA	8	2	12/31/2018	06	Compliance Warning
A	Euliano	00015527	MAIN	Northwestern Polytechnic University, Fremont, CA	Bennett, Anne	SP	8	3	12/31/2018	6	Compliance Warning
A	Euliano	00019408	MAIN	Silicon Valley University, San Jose, CA	Kouko, Cathy	NG	5	12	12/31/2017	06	Compliance Warning
A	Leak	00032160	AL	Art Institute of Indianapolis, Indianapolis, IN	Kouko, Cathy	NG	5	2	12/31/2017	04	Compliance Warning
A	Leak	00032209	AL	Art Institute of Las Vegas, Henderson, NV	Moore, Niana	NG	5	6	12/31/2017	04	Compliance Warning
A	Swartzwelder	00018785	AL	Branford Hall Career Institute	Morrison, Katie	UA	8	9	12/31/2017	1	Compliance Warning
B	Hobdy	00036481	MAIN	Global Health College, Alexandria, VA	Moore, Niana	QAM-HC	11	4	12/31/2018	04	Compliance Warning
B	Hobdy	00010547	MAIN	Harris School of Business	Walters-Gilliam, Perliter	UA	8	8	12/31/2020	01	Compliance Warning
B	Ramirez-Rivera	00024921	MAIN	California Miramar University, San Diego, CA	Wadlington, Maurice	NG	5	3	12/31/2016	06	Compliance Warning
B	Thomas	00021311	MAIN	California University of Management and Sciences, Anaheim, CA	Strout, Joyce	NG	5	5	12/31/2017	05	Compliance Warning
B	Thomas	00023818	MAIN	California University of Management and Sciences, Arlington, VA	Boyd, LaToya	NG	5	8	12/31/2017	05	Compliance Warning
B	Thomas	00010602	MAIN	Empire College, Santa Rosa, CA	Strout, Joyce	NG	5	3	12/31/2017	02	Compliance Warning
B	Thomas	00236409	B	South Baylo University - Virginia, Annandale, VA	Walters-Gilliam, Perliter	IG	4	1	12/31/2016	03	Deferral
B	Thomas	00230247	MAIN	South Baylo University, Anaheim, CA	Wadlington, Maurice	IG	4	0	12/31/2016	03	Deferral
C	Fateri	00011196	MAIN	International Business College, Fort Wayne, IN	Moore, Niana	NG	5	10	12/31/2016	04	Compliance Warning
C	Loverman	00011328	MAIN	New York Institute of English and Business, New York, NY	Morrison, Katie	UA	8	8	12/31/2017	01	Compliance Warning
A	Blake	00011303	MAIN	Ridley-Lowell Business & Technical Inst., New London, CT	Wadlington, Maurice	NG	5	14	12/31/2016	01	Continue Compliance Warn
A	Euliano	00024422	MAIN	SOLEX College, Wheeling, IL	Zeigler, Karly	Hearing-RA	1		12/31/2016	02	Continue Show-Cause
BPC	Ramirez-Rivera	00010898	MAIN	Globe University, Woodbury, MN/Minnesota School of Business	Walters-Gilliam, Perliter	Hearing-Ex	1		12/31/2018		Continue Show-Cause
BPC	Leak	00039183	MAIN	Herquan University, Sunnyvale, CA	Zeigler, Karly	Hearing-Ex	1		12/31/2021		Continue Show-Cause
BPC	Hobdy	00135778	MAIN	Northwest Suburban College	Morrison, Katie	Hearing-Ex	1				Continue Show-Cause
FRC	Swartzwelder	00016231	MAIN	Art Institute of Fort Lauderdale, Fort Lauderdale, FL (EDMC)		Hearing-F	1		12/31/2018		Continue Show-Cause
FRC	Swartzwelder	00016235	MAIN	Art Institute of New York City, New York, NY (EDMC)		Hearing-F	1		12/31/2018		Continue Show-Cause
FRC	Swartzwelder	00016228	MAIN	Art Institute of Phoenix, Phoenix, AZ (EDMC)		Hearing-F	1		12/31/2017		Continue Show-Cause
FRC	Swartzwelder	00032159	MAIN	The Art Institute of York-Pennsylvania, York, PA (EDMC)		Hearing-F	1		12/31/2020		Continue Show-Cause
FRC	Swartzwelder	00010751	MAIN	The Art Institutes International Minnesota, Minneapolis, MN (EDMC)		Hearing-F	1		12/31/2021		Continue Show-Cause
FRC	Euliano	00015728	MAIN	Bristol University, Anaheim, CA	Perliter Walters-Gilliam	Hearing-F	1		1/31/2016		Continue Show-Cause
IEC/FR	Blake	00016303	MAIN	MDT College of Health Sciences, Inc., Highland Heights, OH	Wadlington, Maurice	Hearing-F	1		12/31/2017	04	Continue Show-Cause
A	Edwards	00240200	MAIN	Agape College of Business and Science, Fresno, CA	Wadlington, Maurice	IG	4	4	N/A		Deferral
A	Leak	00016228	MAIN	Art Institute of Phoenix, Phoenix, AZ	Wadlington, Maurice	NG	6	4	12/31/2017	04	Deferral
B	Guinan	00010154	AL	American National University, Florence, KY	Kouko, Cathy	NG	6	5	12/31/2017	03	Deferral
B	Guinan	00010725	AL	American National University, Pikeville, KY	Strout, Joyce	NG	6	4	12/31/2017	03	Deferral
B	Guinan	00010456	AL	American National University, Richmond, KY	Strout, Joyce	NG	6	4	12/31/2017	03	Deferral
B	Guinan	00037761	AL	American National University, South Bend, IN	Sellers, Kathryn	NG	6	4	12/31/2017	03	Deferral
B	Hobdy	00011098	MAIN	Gallipolis Career College, Gallipolis, OH	Kouko, Cathy	UA	9	8	12/31/2017	02	Deferral
C	Bennett	00276405	MAIN	Si Tanka University, Sioux Falls, SD	Sellers, Kathryn	IG	4	16			Deferral
C	Loverman	00270253	MAIN	Florida Academy of Nursing, Miramar, FL	Kouko, Cathy	IG	3	2	N/A		Deferral
IEC	Hobdy	00011098	MAIN	Gallipolis Career College, Gallipolis, OH		Hearing-WS	1		12/31/2017	02	Rescind WS: Reporting
IEC	Hobdy	00010452	MAIN	Branford Hall Career Institute, Branford, CT		Hearing-WS	1		12/31/2017	01	Rescind WS: Show-Cause
IEC	Hobdy	00020809	B	Salter School, Fall River, MA		Hearing-WS	1		12/31/2019	01	Rescind WS: Show-Cause t
FRC	Euliano	00022447	MAIN	Pinchot University, Seattle, Washington		FRC	2		12/31/2017	05	Rescind WS: Show-Cause
BPC	Edwards	000171540	B	American College for Medical Careers, Orlando, FL	Bennett, Anne	Hearing-Ex	1		12/31/2020	04	Vacate
IEC	Bennett	00022181	MAIN	Computer Systems Institute, Skokie, IL (and branches)	Bennett, Anne	Hearing-SA	1	0	12/31/2017	01	Withdrawn by Institution
BPC	Thomas	00054467	MAIN	MJS School of Nursing, Merrillville, IN	Zeigler, Karly	Hearing-Ex	1		12/31/2018		Withdrawn

Committee	Commissioner	Student Achievement Action	School ID	Name	City	State	ID	Level	Program	2014	2015	2016			Recommendation
A	Edwards	FY2 WA Appeal-Retention	00010233	Miller-Motte College	Wilmington	NC	9325	03	Business Administration	55%	42%	51%	Adverse	Appealing	Rescind - good cause extension until the receipt of 2017 CAR
A	Edwards	FY2 WA Appeal-Retention	00010233	Miller-Motte College	Wilmington	NC	9314	03	Criminal Justice	58%	47%	48%	Adverse	Appealing	Rescind - good cause extension until the receipt of 2017 CAR
A	Edwards	FY2 WA Appeal-Retention	00010722	Bryan University	Springfield	MO	28222	01	Business Administration	49%	56%	55%	Adverse	Appealing	Rescind - good standing
A	Edwards	FY2 WA Appeal-Retention	00010911	Miller-Motte Technical College	Clarksville	TN	7380	02	I.T. Support Specialist	51%	59%	54%	Adverse	Appealing	Rescind - good standing
A	Edwards	FY2 WA Appeal-Retention	00023099	Virginia International University	Fairfax	VA	226	01	English As A Second Language	53%	49%	51%	Adverse	Appealing	Rescind - good standing
A	Edwards	FY2 WA Appeal-Retention	00010506	Spencerian College	Louisville	KY	8678	01	Medical Coding Spe	58%	55%	57%	Adverse	Appealing	Rescind - good standing
A	Edwards	FY2 WA Appeal-Placement	00032160	Art Institute of Indianapolis	Indianapolis	IN	14900	04	Media Arts And Animation	39	41	28	Adverse	Appealing	Affirm Adverse pending teach out
A	Edwards	FY2 WA Appeal-Placement	00010452	Branford Hall Career Institute	Branford	CT	6524	01	Medical Assistant	55	46	44	Adverse	Appealing	Rescind - reporting
A	Edwards	FY2 WA Appeal-Placement	00010190	EDIC College	Caguas	PR	9441	03	Medical Sonography	43	34	29	Adverse	Appealing	Affirm Adverse pending teach out
A	Edwards	FY2 WA Appeal-Placement	00010190	EDIC College	Caguas	PR	9442	03	Radiological Technology	23	19	9	Adverse	Appealing	Affirm Adverse pending teach out
A	Edwards	FY2 WA Appeal-Placement	00022418	Harris School of Business	Linwood	NJ	341	01	Pharmacy Technician	52	45	52	Adverse	Appealing	Affirm Adverse pending teach out
A	Edwards	FY2 WA Appeal-Placement	00023814	Living Arts College @ School of Communication Arts	Raleigh	NC	13569	04	Animation & Game Design	56	30	58	Adverse	Appealing	Rescind - reporting
A	Edwards	FY2 WA Appeal-Retention	00042187	Miller-Motte Technical College	Augusta	GA	17642	02	Business Administration	58%	55%	58%	Adverse	Appealing	Rescind - reporting

Committee	Commissioner	Student Achievement Action	School ID	Name	City	State	ID	Level	Program	2018	2015		Recommendation
A	Leak	FY 1 Retention Show Cause	00012360	Art Institute of Indianapolis	Indianapolis	IN	14964	03	Digital Photography	58%	58%	Show Cause	Vocate
B	Thomas	FY 1 Retention Show Cause	00011206	Iowa College	Boone	IA	11222	03	Learning	54%	54%	Show Cause	Vocate
A	Swartzstein	FY 1 Placement Show Cause	00012671	Bearfield Hall Career Institute	Wethersfield	CT	6189	01	Computer Networking Management	55%	47%	Show Cause	Vocate
C	Bonnet	FY 1 Retention Show Cause	00010656	Charter College	Amherst	AK	34726	01	Medical Assistant	59%	56%	Show Cause	Vocate
B	Guinan	FY 1 Retention Show Cause	00010278	American National University	Salem	VA	26159	01	English as Second Language	57%	48%	Show Cause	Vocate Reporting
L	Lozeman	FY 1 Placement Show Cause	00016972	Honors College of Nursing	Independence	OH	13901	01	Practice Nursing	57%	57%	Show Cause	Vocate
B	Thomas	FY 1 Retention Show Cause	00010371	Buckfield College	Flomville	KY	14549	03	Hotel And Restaurant Management	50%	46%	Show Cause	Continue Show Cause
A	Leak	FY 1 Retention Show Cause	00010643	Laurel Technical Institute	Meadville	PA	33464	02	Early Childhood Education	54%	53%	Show Cause	Vocate
B	Guinan	FY 1 Placement Show Cause	00011304	Lincoln Technical Institute	Mooresville	NC	17622	001	Patient Care Technician	58%	58%	Show Cause	Vocate
B	Thomas	FY 1 Retention Show Cause	00012680	Buckfield College	Springdale	OH	12179	03	Paralegal Studies	57%	57%	Show Cause	Continue Show Cause
C	Berwick	FY 1 Placement Show Cause	00010656	Charter College	Amherst	AK	19548	001	Business Office Administration	52%	50%	Show Cause	Continue Show Cause
C	Facer	FY 1 Placement Show Cause	00010211	College Technologie Comertia de PB	Algeria	FR	8222	01	Pharmacy Technician	52%	47%	Show Cause	Continue Show Cause
B	Rain rez R vera	FY 1 Retention Show Cause	00014762	McCann School of Business & Technology	Albany	GA	28949	02	Human Services Assistant	52%	56%	Show Cause	Vocate
L	Jensen	FY 1 Retention Show Cause	00010326	Dewey University - Fayetteville Campus	Fayetteville	NC	5275	01	Medical Billing	58%	55%	Show Cause	Continue Show Cause
C	Tamm	FY 1 Retention Show Cause	00010372	Ryan University	Springfield	MO	28164	03	Healthcare Administration	58%	53%	Show Cause	Vocate Reporting
B	Rain rez R vera	FY 1 Retention Show Cause	00011300	McCann School of Business and Technology	Shreveport	LA	19156	02	Criminal Justice	56%	57%	Show Cause	Vocate
C	Facer	FY 1 Retention Show Cause	00014036	Dewey University - Morgantown	Morgantown	PA	14926	03	Environmental Engineering Technology	58%	53%	Show Cause	Continue Show Cause
B	Rain rez R vera	FY 1 Retention Show Cause	00019130	Mid-Atlantic College	Fayetteville	NC	13682	03	Criminal Justice	55%	56%	Show Cause	Vocate
C	Facer	FY 1 Retention Show Cause	00014038	Dewey University - Morgantown	Morgantown	PA	14921	03	Electrical Engineering Technology In Computer	58%	40%	Show Cause	Continue Show Cause
L	Lozeman	FY 1 Retention Show Cause	00010390	Leitch College	Casper	WY	13976	03	Nursing	53%	57%	Show Cause	Continue Show Cause
B	Thomas	FY 1 Retention Show Cause	00014673	Harris School of Business	Upper Merion	PA	18421	01	Professional Medical Assistant	55%	59%	Show Cause	Vocate Reporting
B	Rain rez R vera	FY 1 Retention Show Cause	00013464	Mid-Atlantic Technical College	Columbus	GA	14247	01	Medical Billing And Coding	58%	54%	Show Cause	Vocate
C	Lozeman	FY 1 Retention Show Cause	00010754	Everest College	Arlington	TX	1556	03	Business Administration	55%	42%	Show Cause	Continue Show Cause
B	Guinan	FY 1 Placement Show Cause	00011673	Lincoln Technical Institute	Paramus	NJ	17621	001	Patient Care Technician	58%	50%	Show Cause	Continue Show Cause
B	Rain rez R vera	FY 1 Retention Show Cause	00010711	Mid-Atlantic College	Washington	DC	11304	03	Electronic Health Records	55%	53%	Show Cause	Continue Show Cause
B	Rain rez R vera	FY 1 Retention Show Cause	00010212	Mid-Atlantic College	Wilmington	NC	8313	03	Paralegal	54%	52%	Show Cause	Continue Show Cause
B	Rain rez R vera	FY 1 Retention Show Cause	00010711	Mid-Atlantic College	Washington	DC	11326	03	Accounting	55%	53%	Show Cause	Continue Show Cause
C	Facer	FY 1 Placement Show Cause	00013024	Long Arts Institute @ School of Education Arts	Winston Salem	NC	14945	01	Medical Assistant	57%	44%	Show Cause	Vocate Reporting
B	Rain rez R vera	FY 1 Retention Show Cause	00010212	Mid-Atlantic College	Wilmington	NC	12194	01	Network Administration and Security	58%	55%	Show Cause	Continue Show Cause
B	Rain rez R vera	FY 1 Placement Show Cause	00010317	Mid-Atlantic Technical College	Yorkburg	VA	21512	02	Network Administration and Security	58%	53%	Show Cause	Continue Show Cause
A	Fulmer	FY 1 Retention Show Cause	00106807	Pinnacle Career Institute - Duluth Filmmaking	Duluth	GA	25251	01	Medical Assistant	55%	46%	Show Cause	Vocate
C	Lozeman	FY 1 Retention Show Cause	00012661	Southern Technical College	Tampa	FL	1826	01	Medical Assistant	58%	57%	Show Cause	Vocate
B	Rain rez R vera	FY 1 Retention Show Cause	00010286	Mid-Atlantic Technical College	Christiansburg	VA	1667	02	Business Administration	58%	43%	Show Cause	Vocate Reporting
L	Tamm	FY 1 Retention Show Cause	00010761	Viripia College	Birmingham	AL	211	03	Medical Office Administration	57%	52%	Show Cause	Vocate
C	Tamm	FY 1 Retention Show Cause	00011666	Walden College	Montgomery	AL	5261	01	Pharmacy Technician	58%	59%	Show Cause	Vocate

Institution ID	Name	City	State	Program ID	Program Name	Credential	Licensure	Action	April 2017 Action
00012651	Pioneer Pacific College	Wilsonville	OR	2705	Medical Assisting W/Limited X-Ray	Occupational Associate's D	45%	Show-Cause	Vacate x
00012651	Pioneer Pacific College	Wilsonville	OR	2704	Medical Assisting W/Limited X-Ray	Certificate/Diploma	45%	Show-Cause	Vacate x
00033024	Living Arts Institute	Winston-Salem	NC	N/A	Medical Assistant	Certificate/Diploma	61%	Show-Cause	Vacate- Place on reporting X

ACCREDITING COUNCIL  
FOR INDEPENDENT COLLEGES AND SCHOOLS

OFFICIAL MINUTES OF THE MEETING OF THE COUNCIL

ACICS OFFICE  
750 First Street, NE, Suite 980  
Washington, D.C. 20002-4223

December 5-9, 2016

**FINAL**

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## MEETING PARTICIPANTS

### COMMISSIONERS

Dr. Lawrence Leak, *Chair*  
Mr. Roger Swartzwelder, *Chair-Elect*  
Dr. Edward Thomas, *Treasurer*  
Mr. Richard Bennett  
Ms. Julie Blake  
Ms. Michelle Edwards  
Mr. John D. Euliano  
Dr. Fardad Fateri  
Mr. Jay Fund  
Dr. Adriene K. Hobdy  
Dr. Deborah Jones  
Mr. Luis Llerena  
Dr. Ruth Shafer  
Ms. Martha Loveman  
Dr. Judec Timm (Observer)

### STAFF

Mr. Roger Williams, Interim President  
Ms. Latoya Boyd, Accreditation Coordinator  
Ms. Anne Bennett, Accreditation Coordinator  
Ms. Jan Chambers, Accreditation Coordinator  
Mr. Quentin Dean, Senior Regulatory Affairs Coordinator  
Ms. Chalita Dudley, Information Management Manager  
Mr. Steven Gelfound, Vice President of Information Technology  
Ms. Trina Green, Senior Accounting Manager  
Dr. Terron King, Senior Manager, Institutional and Program Review  
Ms. Linda Lundberg, Accreditation Content Editor  
Mr. Andre McDuffie, Senior Human Resources Coordinator  
Ms. Niana Moore, Accreditation Coordinator  
Ms. Katie Morrison, Accreditation Coordinator  
Ms. Andrea Reid, Assistant Manager, Administration  
Ms. R. Kay Ropko, Senior Systems Architect  
Ms. Shaniqua Smith, Program Analyst I  
Mr. Maurice Wadlington, Senior Accreditation Coordinator  
Ms. Perliter Walters-Gilliam, Associate Vice President, Quality Enhancement and Training  
Ms. Karly Zeigler, New Institutions Development Lead

## ACCEPTANCE OF MINUTES

### I. CALL TO ORDER

Chair Larry Leak called the meeting to order at 8:30a.m. on Tuesday, December 6, 2016. He welcomed all commissioners and staff to the meeting.

## II. APPROVAL OF MINUTES

The Council reviewed the minutes from the August 2016 Council Meeting Minutes, and August-November 2016 Executive Meeting Minutes.

**MOTION:** Accept the Council meeting minutes as presented.  
**MOVED:** Thomas  
**SECONDED:** Blake  
**ACTION:** Passed

## OLD BUSINESS

### II. DOE UPDATE REPORT

Staff Williams provided an update to the Council regarding the current status with the Department of Education and the recent meeting with the Council for Higher Education Accreditation. Staff Williams also noted that ACICS has been in communication with the ASL staff, namely, Herman Bounds and Steve Porcelli, and they have been invited to attend the Council meeting.

### III. MORATORIUM ON DOCTORAL PROGRAMS

Chair Leak presented a recommendation from the board to place an immediate moratorium on all new doctoral programs. In addition, the Council discussed the 11 campuses that currently offer doctoral programs (which consists of 194 students). The Council asked the staff to discuss the doctoral programs individually with each affected campus and develop a process for no longer allowing new students and discontinuing the current programs.

**MOTION:** An immediate moratorium on accepting any new doctoral programs and staff, in discussion with institutions, to develop a process for discontinuing current programs  
**MOVED:** Swartzwelder  
**SECONDED:** Euliano  
**ACTION:** Passed

### IV. IN WRITING HEARING REPORTS

#### A. Bristol University, Anaheim, CA [00015728]

##### Financial Show-Cause Hearing (In Writing)

**MOTION:** Retroactive placement on compliance warning and continue show-cause directive  
**MOVED:** Euliano  
**SECONDED:** Edwards  
**ACTION:** Passed

#### B. Herguan University, Sunnyvale, CA [00015728]

##### External (Adverse) Information Show-Cause Hearing (In Writing)

**MOTION:** Continue show-cause directive (reconvene at January executive meeting)  
**MOVED:** Leak  
**SECONDED:** Blake  
**ACTION:** Passed

**C. Education Management Corporation**

*The Art Institute of York-Pennsylvania, NY – ACICS ID: 00032159 main*

*Art Institute of Fort Lauderdale, Fort Lauderdale, FL – ACICS ID: 00016231 main*

*The Art Institutes International Minnesota, Minneapolis, MN – ACICS ID: 00010751 main*

*Art Institute of Phoenix, Phoenix, AZ – ACICS ID: 00016228 main*

*Art Institute of New York City, NY, NY – ACICS ID: 00016235 main*

**Financial Show-Cause Hearing (In Writing)**

**MOTION:** Continue show-cause directive

**MOVED:** Swartzwelder

**SECONDED:** Bennett

**ACTION:** Passed

**D. MJS College School of Nursing and Business, Merrillville, IN [00054467]**

**External (Adverse) Show-Cause Hearing (In Writing)**

**MOTION:** Continue Show-cause to April meeting

**MOVED:** Thomas

**SECONDED:** Blake

**ACTION:** Passed

**V. REVIEW BOARD HEARING REPORT**

Staff Williams updated the Council on the Review Board Hearing that took place to hear the appeal from CENSA International College, Miami Gardens, FL [00248377] on the denial of their initial application. The review board acted to affirm the decision of the denial.

**VI. INTENT TO DEBAR HEARING REPORTS**

**A. David Abrams and Abrams Capital, LLC –Anthem Education**

**Intent to Debar Hearing (In Writing)**

**MOTION:** Vacate Intent to Debar Action for David Abrams and Abrams Capital

**MOVED:** Llerena

**SECONDED:** Blake

**ACTION:** Not Passed

**ABSTAIN:** Fateri

The Council decided to table action on this matter until Friday, December 9, 2016.

**B. Jack Massimino – Corinthian Colleges, Inc.**

**Intent to Debar Hearing (In Writing)**

Table until December 7, 2016

**MOTION:**

**MOVED:** Llerena

**SECONDED:**

**ACTION:**

**C. Corinthian Colleges, Inc. Board of Directors**

**Intent to Debar Hearing (In Person)**

**MOTION:** Vacate Intent to Debar Action for Corinthian College, Inc. Board of Directors  
**MOVED:** Blake  
**SECONDED:** Llerena  
**ACTION:** Passed

## **VII. POLICY ACTION ITEMS**

### **1. Policy Item #1 - Show-Cause/Council Action Standards**

**COMMITTEE:** Full Council/12.16/1  
**SUBJECT:** ~~Probation~~ Show-Cause Standards/Council Action Standards  
**STAFF:** Karly Zeigler/Ian Harazduk

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#### **ISSUE**

The Council recently modified the Council Action Process to include specific nomenclature and definitions for out of compliance actions. The Council also determined it to be important that the procedures for probation standards be clarified, since the action had been used minimally and as a supplemental action for other out of compliance actions. However, in review of the Council action process and the proposed language for the new probation standard, the actions appear to be somewhat duplicative.

In further discussions, it was decided that “show-cause” was the more appropriate term to capture the intent.

#### **OVERVIEW**

Staff previously conducted research on probation standards at two regional accreditors and five national accreditors. The results of the research are in the attached chart that has been previously reviewed. The determination from this review is that ACICS may need to lessen the amount of actions that it may take in between no action (deferral) and an adverse action. The current proposed language allows for three separate non-compliant actions (i.e. compliance warning, show-cause, probation). Two of these actions are substantially similar—show-cause directive and probation order. In each case the Council has serious concerns about the institution’s ability to remain in compliance. Procedurally the main difference is that probation must be disclosed by the agency and the institution. With that said, the recommendation is to essentially combine the Show-Cause Directive and Probation Order into one “severe” non-compliant action. The procedures would be generally the same in that a hearing still may be available to institutions and when a show-cause directive is issued, the agency and institution would notify the public.

In addition, the Council needs to clarify that the actions taken in the Council Action Process menu of choices do not need to be taken step-by-step. If an institution is materially or severely out of compliance, then the agency may need to take an immediate show-cause or adverse action. However, due process should be applied in all cases, in that an institution should have a chance to respond.

There were 9 responses from the September memo to the field, 8 accepted it as written and 1 wanted to modify the language. The only comment was requesting that in person should be available.

#### **CRITERIA**

**Title II, Chapter 3, Council Actions -Introduction**

When the Council has considered all of the information and reports submitted as a result of the accrediting process, it will make a judgment as to an institution's compliance with the *Accreditation Criteria*. The Council's decision is based on the extent of an institution's compliance. The judgment made is referred to as a "Council action." The actions which the Council may take are described in this chapter. Procedures available to institutions to challenge those actions and the maximum time frames for achieving final disposition of those actions by the Council also are explained. There are four general areas of Council actions: accreditation granted, accreditation deferred, accreditation denied, and accreditation withdrawn.

If the Council determines that an institution is not in compliance with the *Accreditation Criteria*, it will take prompt adverse action against the institution, or it will require the institution to take appropriate action to bring itself into compliance with the *Accreditation Criteria* within a time frame specified by the Council after the institution has been notified that it is not in compliance. That time frame will not exceed and may be less than the following:

- (a) twelve months, if the longest program is less than one year in length;
- (b) eighteen months, if the longest program is at least one year, but less than two years in length; and
- (c) two years, if the longest program is at least two years in length.

### **2-3-100 – Accreditation Granted**

If an institution is found to be in compliance with the *Accreditation Criteria*, ACICS may grant accreditation for a specific period of time from a minimum of one year to a maximum of six years. The length of the grant shall be at the discretion of ACICS. A grant of accreditation for less than six years is not a negative action and, therefore, is not appealable.

The Council will not grant accreditation for a full six-year term if the grant is awarded following any hearing resulting from a previous action to deny accreditation.

~~**2-3-101. Admonition.** The Council may judge an institution to be generally in compliance with the criteria, but it also may wish to call the institution's attention to one or more deficiencies that are not serious enough to preclude a grant of accreditation but that nonetheless must be corrected. In these cases, the institution will be awarded a grant of accreditation but will be admonished to correct the deficiencies. An admonition is an instruction to an institution either to initiate some prescribed practice or to refrain from some proscribed activity. An admonition does not condition the grant of accreditation, but failure to respond to it could result in a subsequent negative action.~~

### **2-3-200 – Accreditation Deferred or Conditioned**

The Council, upon review of relevant information concerning an institution, may take any of the following actions at any time in accordance with the procedures described, up to and including a final adverse action.

**2-3-210. Deferral.** When Council determines there is insufficient evidence available to make a decision, ~~they~~ it may defer action until a later date pending receipt of additional information. In such cases, the Council will provide in writing the reasons for the deferral, state what the institution needs to provide with sufficient time for the institution to respond, and specify the response date. Based on the nature and/or number of identified deficiencies, the Council may require attendance of key administrators at a workshop and/or consultation.

Deferral is, in effect, "no action at this time" and is not a negative action. Therefore, deferral is not an appealable action. Neither is a deferral a final action. In all cases of deferral on renewal of accreditation of accredited institutions, the Council will extend the present grant of accreditation for a period sufficient for the institution to provide the information needed.

**2-3-220. Compliance Warning.** When the Council determines that an institution is not in compliance with the *Accreditation Criteria*, the Council ~~will~~ may issue a compliance warning. The institution will be provided in

writing with the areas of noncompliance and will be required to demonstrate corrective action for review by ACICS.

The Council may issue a show-cause directive or a denial action/~~suspension order~~ may be issued by ACICS as the result of ~~this review~~ reviewing a compliance warning as described in Section 2-3-230 or 2-3-402. Following receipt of a compliance warning, the institution must bring itself into compliance within the time frames specified in Title II, Chapter 3, or the institution will be subject to a final adverse action.

~~When the reasons for the compliance warning are satisfied, the action may be lifted either by the President in cases where no evaluation is involved.~~

~~**2-3-230. Show-Cause Directive.** When the Council determines that an institution is not in compliance, and is unlikely to become in compliance, with the *Accreditation Criteria*, the institution will be provided in writing with the areas of noncompliance and will be invited to “show cause” why its accreditation should not be suspended or otherwise conditioned.~~

~~The opportunity to show cause before the Council will be considered to be a hearing as defined in Section 2-3-500. A suspension order or denial action may be issued by ACICS as the result of this hearing, and such action is considered a final action which may only be appealed to the Review Board of Appeals as described in Section 2-3-600. Following receipt of a show-cause directive, the institution must bring itself into compliance within the time frames specified in Title II, Chapter 3, or the institution will be subject to final adverse action.~~

~~When the reasons for the show-cause are satisfied, the directive may be lifted by ACICS. All institutions directed by the Council to show-cause why their accreditation should not be suspended or otherwise conditioned will be directed to submit a school closure plan and may be required to submit a teach-out agreement as described in Section 2-2-303 of the *Accreditation Criteria*.~~

**2-3-240230, Show-Cause Directive.**

~~Probation~~ Show-cause is a status that the Council may impose on an institution when it determines that if the institution does not ~~is unable to demonstrate that it consistently~~ materially operates in accordance with the *Accreditation Criteria*. **2-3-241231. Imposition.** ~~The Council will provide the institution with a written summary of the areas of noncompliance, and the institution will be required to provide evidence of~~ The institution will be provided in writing the areas in which the institution did not materially operate in accordance with the *Accreditation Criteria*, will be required to demonstrate corrective action for review by ACICS. Probation may be imposed by the Council either when it continues a show-cause directive after at least one hearing either in person or in writing, or after an institution has notified the Council that it intends to appeal a denial action. Following receipt of a show-cause directive, the institution must bring itself into compliance within the time frames specified in Title II, Chapter 3, or the institution will be subject to an adverse action.

The issuance of a show-cause directive may be considered the basis for a hearing, at the discretion of the Council, as defined in Section 2-3-500. A suspension order or denial action may be issued by ACICS as the result of this hearing, and such action is considered a final action which may only be appealed to the Review Board of Appeals as described in Section 2-3-600. All institutions that are issued a show-cause directive by the Council will be directed to submit a school closure plan and may be required to submit a teach-out agreement as described in Section 2-2-303 of the *Accreditation Criteria*.

**2-3-242231. Result of Probation Show-Cause.** The Council will not accept any applications for new programs or new campuses from any institution on ~~probation~~ show-cause unless the institution receives approval in advance to submit such an application.

**2-3-243232. Probation Vacate Show-Cause Lifted.** Probation does not expire automatically. Instead, the institution is obligated to demonstrate to the Council that the conditions or circumstances which initially led to the imposition of probation have been corrected before probation will be lifted. Probation may be continued even if the show-cause directive has been vacated. (See Title II, Chapter 3, Introduction). If the institution demonstrates that it has addressed the Council's concerns and is operating in compliance with the *Accreditation Criteria*, then the show-cause may be lifted by ACICS. The Council may also order a special visit at the institution's expense before lifting the probation show-cause.

**2-3-244233. Notification of Probation Show-Cause.** The Council will notify the U.S. Secretary of Education, appropriate state regulatory agencies, other appropriate accrediting agencies, and the public of its decision to place an institution on probation show-cause. The institution is required to notify immediately in writing its current and prospective students and the public about its show-cause status through appropriate means, including posting a prominent notice on its webpage that it has been placed on probation by its accrediting agency.

### 2-3-300 – Accreditation Denied

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### 2-3-400 – Accreditation Withdrawn

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**2-3-403. Procedural Guarantees for Withdrawal by Suspension.** In all cases where accreditation is subject to withdrawal by suspension under Section 2-3-402, the institution is afforded the following procedural guarantees:

(a) Opportunity for a hearing before ACICS on all material issues in controversy.

(b)(a) Written prior notice of the proceedings, the charges levied, and the standards by which the institution ultimately is to be judged.

(c)(b) A decision on the record alone and a statement of reasons for the ultimate decision.

(d)(c) A right of appeal as provided in Section 2-3-600.

(e)(d) If the Review Board of Appeals affirms the withdrawal of accreditation by way of suspension, the appeal shall be deemed to be finally disposed of upon issuance of the decision and publication will be made as described in Section 2-3-607.

### 2-3-500 – Council Hearing Procedures

All hearings will be in writing unless the Council exercises its sole discretion to allow a hearing in person before the Council. The following procedures will govern hearings to be held before the Council:

(a) The request for acceptance of a hearing must be made by a date determined by the Council, which will not be less than 10 days from the date of receipt of the letter of notification of the show-cause directive. The request for acceptance of a hearing must be in writing and signed by the chief executive officer of the institution. Upon receipt of the request for acceptance of a hearing, the Council will notify the institution of the procedures to follow to prepare for the hearing, including the dates by which the institution must submit its response to the show-cause directive.

(b) The institution shall have the right to respond with evidence and facts concerning the areas of noncompliance with which it has been charged, to raise all reasonable questions, and to present evidence in opposition to or extenuation of the charges of noncompliance. Such written evidence must be submitted by the date prescribed by the Council unless the institution can show that such information was not available before the submission date and that failure to make a timely submission was outside of the institution's control.

(c) At the In the event the Council allows a hearing in person, the institution may present only evidence not already considered. The institution may send one or more representatives, including legal or financial counsel, to present its argument in opposition to or extenuation of the Council action. The Council transcribes all such hearings for its records. A copy of the transcript is available to the institution upon request.

**2-3-501. Hearing Format.** Hearings before the Council resulting from a show-cause directive and involving areas of noncompliance other than or in addition to financial concerns will take place before a panel of commissioners.

A hearing panel of at least three commissioners will be designated by the Council to hear the presentation of the institution. The panel will present its findings and its recommended action to the full Council, which will make the final decision ~~in a within the time frames specified in Title II, Chapter 3. not to exceed twelve months, if the longest program is less than one year in length; eighteen months, if the longest program is at least one year, but less than two years in length; and two years, if the longest program is at least two years in length from the time the institution was found out of compliance with the Accreditation Criteria.~~

**2-3-502. Financial Hearings.** All hearings before the Council for financial concerns only will be heard by a panel of at least three commissioners, which will include at least one representative of the Financial Review Committee. The panel will present its findings and its recommended action to the full Council, which will make the final decision ~~in a within the time frames specified in Title II, Chapter 3 not to exceed twelve months, if the longest program is less than one year in length; eighteen months, if the longest program is at least one year, but less than two years in length; and two years, if the longest program is at least two years in length from the time the institution was found out of compliance with the Accreditation Criteria.~~

#### OPTIONS

1. Vote to approve the proposed policy presented below and publish it in the *Accreditation Criteria*, effective January 1, 2017.
2. Vote to approve the proposed policy with amendments shown below and publish it in the *Accreditation Criteria*, effective January 1, 2017.

The amendments are included in the policy language **(highlighted in yellow)** above.

3. Recommend a different approach to policy issue as stated below:
4. Remove from further consideration.

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**MOTION:** Option 2

**MOVED:** Swartzwelder

**SECONDED:** Hobdy

**ACTION:** Passed

#### **2. Policy Item #2 – Due Process for Student Achievement and CAR Guidelines (Appendix L)**

**COMMITTEE:** Full Council/12.16/2

**SUBJECT:** Due Process for Student Achievement and CAR Guidelines Appendix L

**STAFF:** Ms. Karly Zeigler/Mr. Ian Harazduk

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#### ISSUE

In the report for the DOE (See Section 602.20(a)), the staff analyst stated that ACICS was not following DOE requirements because ACICS “deferred” institutions that were below the Council standard for student achievement in “Year 1.” In addition, the analyst determined that ACICS did not have a clear and explicit

procedure for initiating immediate adverse action against an institution that had poor student achievement outcomes.

## OVERVIEW

In order to clarify any confusion that resulted from the previous Due Process table, the revised table is proposed for the 2016 CAR review cycle. Due to feedback from the field, Council may want to consider a later effective date following submission of a quarterly CAR.

Following the August 2016 meeting, staff revised the Student Achievement Actions Table to indicate that a campus and/or program will be considered out of compliance if they are below the Council standard and that no campus or program can exceed the maximum time frame.

**2-1-809. Student Achievement Review.** The Council reviews the Campus Accountability Report (CAR) ~~and Institutional Accountability Report (IAR)~~ to monitor performance in terms of student achievement at both the campus and program levels. Measures will include retention; placement; and licensure, ~~registration or certification examination~~ pass rates, if applicable. When this review indicates that the achievement of an institution's students is below benchmark ~~weak or deteriorating~~, the Council will place the campus or program on reporting and require the institution to add an improvement plan within its Campus Effectiveness Plan (CEP) ~~and/or Institutional Effectiveness Plan (IEP)~~. If the Council determines the institution no longer complies with the Council's requirement for student achievement, the Council will issue a compliance warning, a ~~show-cause directive~~ show-cause directive, or otherwise take action and require the institution to demonstrate compliance within the time frames described in Title II, Chapter 3. If the Council deems an institution significantly out of compliance relative to student achievement outcomes with little or no chance of coming into compliance, then it will take an adverse action. These time frames may be extended at the sole discretion of the Council for good cause, including evidence that there has been significant improvement in the deficient area(s) and the applicable time frame does not provide sufficient time to demonstrate full compliance, e.g., significant improvement in retention, placement, or licensure pass rates. Institutions that are required to include a plan of student achievement improvement within their CEPs or that are determined to be out of compliance with the Council's standards for student achievement are considered to be on student achievement review. Those with campus- or ~~institution~~ program-level plans are subject to additional reporting requirements, and additional restrictions may be imposed upon those that are out of compliance.

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**2-2-502. Program Show-Cause or Compliance Warning.** When the Council determines that a program at a campus of the institution has fallen below the compliance standard for retention, placement, or licensure examination pass rates, the institution will be provided in writing with a show-cause or compliance warning regarding the alleged deficiency. The show-cause or compliance warning will note that the program will have to come into compliance by meeting or exceeding the program-level standard prior to the expiration of the established timeframe or be taught out and discontinued or otherwise conditioned.

A program show-cause or compliance warning is not a negative or conditioning action and is therefore not appealable. Rather, it is issued as an official notification to an institution that a program provided by the institution is out of compliance with agency standards. Following receipt of a program show-cause or compliance warning, the institution must bring itself into compliance within the time frames specified in Title II, Chapter 3 and Appendix L, or the institution will be subject to adverse action in the form of withdrawal of approval for inclusion of the program within the institution's grant of accreditation as described in Section 2-2-503. ~~The time frames may be extended at the sole discretion of the Council for good cause, including evidence that there has been significant improvement in the deficient area(s) and the applicable time frame does not provide sufficient time to demonstrate full compliance, e.g., significant improvement in retention, placement or licensure pass rates.~~

A program that is placed on show-cause status is required to notify immediately in writing its current and prospective students and the public about its show-cause status through appropriate means.

**2-2-503. Termination of Programs.** The withdrawal of approval for a program following the issuance of a program compliance warning or a decision by an institution to terminate any program voluntarily must be appropriately communicated to all interested publics. These publics include, but are not limited to, students, governmental agencies, the local community, and ACICS.

All institutions subject to the withdrawal of approval for a program or who voluntarily terminate an approved program will be directed to submit a program termination plan that conforms to the following requirements. New students may not be enrolled in any program which cannot be completed prior to the termination date for which public notice has been given. Moreover, the institution is obligated to continue to offer appropriate courses, including prerequisites, so that currently enrolled students will be able to complete the program and receive the credential which was their designated educational objective. For this purpose, the period of time need not extend beyond sufficient time for students already enrolled and maintaining normal academic progress to complete the program.

Council-directed withdrawal of approval for a program conditions the institution's grant of accreditation with respect to the inclusion of the program and therefore is appealable to the Council. Due to the limited nature and narrow scope of the withdrawal of program approval, the appeal to the Council may be in writing only.

To maintain approval, an institution must demonstrate active enrollment in each program of study. If an approved program is inactive for at least ~~three~~ two years, the program will be considered discontinued and will be removed from the institution's list of approved programs. To reinstate the program, the institution must initiate a new program application process. Programs that have not started within one year of the proposed start date will be surrendered. To reinstate the program, the institution must initiate a new program application process. Requests to extend a new program's proposed start date beyond one year of the initial date must be submitted to the President.

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## **APPENDIX L Student Achievement Standards and Campus Accountability Reports**

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### **INTRODUCTION**

ACICS defines academic quality in terms of the extent to which an accredited institution achieves its intended student learning and student success outcomes. Student learning outcomes involve assessment of skill and competency attainment, including licensure pass rates, where applicable. Student success outcomes include student retention or persistence and employment or placement.

Section 2-1-809 of the Accreditation Criteria requires periodic Council review of student achievement data, verified both by the institution as well as by the Council, submitted by the campus in the annual Campus Accountability Report (CAR) as required under Section 2-1-801. Appendix L provides an overview of the Council's student achievement standards and Council actions that will be taken if the student achievement data show that a campus or program is out of compliance with these standards.

### **STUDENT ACHIEVEMENT STANDARDS**

Student achievement standards outlined below apply to retention and placement rates at the campus and program levels, and licensure examination pass rates, where applicable, at the program level. Minimum standards are intended to ensure that a substantial majority of students at ACICS-accredited campuses are retained, pass licensure examinations where applicable, and find appropriate employment.

<b><u>Campus- Level Student Achievement Elements</u></b> <b><u>(Effective 2013 Reporting Year)</u></b>	<b><u>Standard</u></b>	<b><u>Benchmark*</u></b>
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<u>Retention Rate</u>	<b><u>60%</u></b>	<b><u>70%</u></b>
<u>Placement Rate</u>	<b><u>60%</u></b>	<b><u>70%</u></b>
<b><u>Program- Level Student Achievement Elements (Effective 2013 Reporting Year)</u></b>	<b><u>Standard</u></b>	<b><u>Benchmark*</u></b>
<u>Retention Rate</u>		
<ul style="list-style-type: none"> <li>• <u>Program length equal to or less than one (1) year</u></li> <li>• <u>Program length equal to or more than one (1) year</u></li> </ul>	<b><u>60%</u></b> <b><u>60%</u></b>	<b><u>70%</u></b> <b><u>65%</u></b>
<u>Placement Rate</u>	<b><u>60%</u></b>	<b><u>70%</u></b>
<u>Licensure Examination Pass Rates, where applicable**</u>	<b><u>60%</u></b>	<b><u>70%</u></b>

\*A campus and/or program whose rates fall below the Benchmark must develop and implement an Improvement Plan.

\*\*Licensure examination pass rates apply where a licensure is required for employment. The program is also required to meet applicable licensure agency standards if higher rates are required.

### **DATA COLLECTION AND VERIFICATION OF DATA INTEGRITY**

As required under **Standard 2-1-801** each main campus and each branch campus must submit an annual Campus Accountability Report (CAR). These reports are due on or before **November 1** annually. The CAR reporting year is July 1 to June 30. Placement is accepted through November 1<sup>st</sup> of the CAR reporting year. Based on the student-by-student data submitted by the campus, the Council calculates the various student achievement rates. All data reported to ACICS for any purpose is expected to reflect an accurate and verifiable portrayal of institutional performance and is subject to review for integrity, accuracy, and completeness (See **Standard 3-1-203**). In addition to the Council review of data on an annual basis, placement information is reviewed via monthly submissions, and all CAR data is subject to review and verification at any time, including during an on-site evaluation visit.

### **STUDENT ACHIEVEMENT REVIEW AND COUNCIL ACTIONS**

The Council reviews student achievement data for each campus on an annual basis and takes appropriate action. The Council reserves the right to take immediate adverse action once a campus and/or program is found out of compliance. The Council will follow the guidelines listed below:

<u>Year Reporting</u>	<u>Rates</u>	<u>Campus and/or Program Status*</u>	<u>Council Directed Activities</u>
<b><u>Current Submission**</u></b>	<b><u>60-69.9%</u></b>	<b><u>Reporting</u></b>	<ul style="list-style-type: none"> <li>• <u>Implementation of an Improvement Plan (IP) and inclusion into the Campus Effectiveness Plan (CEP) (campus- and program-level)</u></li> <li>• <u>Attendance at ACICS' Retention and Placement Workshop (campus-level)</u></li> </ul>
	<b><u>50-59.9%</u></b>	<b><u>Compliance Warning</u></b>	<ul style="list-style-type: none"> <li>• <u>Implementation of an Improvement Plan (IP) and inclusion into the Campus Effectiveness Plan (CEP) (campus- and program-level)</u></li> <li>• <u>Mid-year rate and backup documentation of the activities occurring between July 1</u></li> </ul>

			and December 31 ( <i>campus-level</i> )
	<u>Below 49.9%</u>	<u>Show-Cause</u>	<ul style="list-style-type: none"> <li>• <u>Submit evidence of corrective action to the Council (<i>campus- and program-level</i>)</u></li> <li>• <u>Mid-year rate and backup documentation of the activities occurring between July 1 and December 31 (<i>campus-level</i>)</u></li> <li>• <u>Notification of its status to its current and prospective students (<i>campus- and program-level</i>)</u></li> </ul>
	*	<u>Adverse Action</u>	<ul style="list-style-type: none"> <li>• <u>Implement an ACICS approved Teach-out Plan and Agreement, if applicable (<i>campus- and program-level</i>)</u></li> <li>• <u>Appealable to the Review Board of Appeals (<i>campus-level</i>)</u></li> <li>• <u>Submit a Program Termination Plan for ACICS approval (<i>program-level</i>)</u></li> </ul>
<u>Following Year 1</u>	<u>50-59.9%</u>	<u>Show-Cause</u>	<ul style="list-style-type: none"> <li>• <u>Submit evidence of corrective action to the Council (<i>campus- and program-level</i>)</u></li> <li>• <u>Notification of its status to its current and prospective students (<i>campus- and program-level</i>)</u></li> <li>• <u>Attendance at ACICS' Retention and Placement Workshop (<i>campus-level</i>)</u></li> </ul>
	<u>Below 59.9%</u>	<u>Adverse Action</u>	<ul style="list-style-type: none"> <li>• <u>Implement an ACICS approved Teach-out Plan and Agreement, if applicable (<i>campus- and program-level</i>)</u></li> <li>• <u>Appealable to the Review Board of Appeals (<i>campus-level</i>)</u></li> <li>• <u>Submit a Program Termination Plan for ACICS approval (<i>program-level</i>)</u></li> </ul>
<u>Following Year 2</u>	<u>Below 59.9%</u>	<u>Adverse Action</u>	<ul style="list-style-type: none"> <li>• <u>Implement an ACICS approved Teach-out Plan and Agreement, if applicable (<i>campus- and program-level</i>)</u></li> <li>• <u>Appealable to the Review Board of Appeals (<i>campus-level</i>)</u></li> <li>• <u>Submit a Program Termination Plan for ACICS approval (<i>program-level</i>)</u></li> </ul>

*\* If the Council deems an institution or an individual program significantly out of compliance relative to student achievement outcomes with little or no chance of coming into compliance within the maximum time frame, it will take an adverse action. In the event that the Council finds an institution or an individual program to be out of compliance at a level that, in its judgement, can be remedied in a reasonable period of time, it will take action appropriate to the circumstances such as compliance warning or show-cause.*

**\*\*For any campus or program that receives a compliance warning or show-cause, the institution must bring itself into compliance within the time frames specified in Title II, Chapter 3 (i.e. an institution whose longest program is less than one year in length has a timeframe of twelve months to come into compliance).**

## **DESCRIPTION OF STUDENT ACHIEVEMENT REVIEW ACTIONS**

**Immediate Adverse Action** – The Council reserves the right to take immediate adverse action if the campus is significantly out of compliance with the Council standards with little or no chance of coming into compliance within the maximum time frame. An adverse action for a campus is a withdrawal by suspension and for a program is termination of the program, except for teach-out purposes for the currently enrolled students. **An institution, in accordance with Section 2-3-403(a), will be allowed the opportunity for a hearing prior to the issuance of a withdrawal by suspension.**

**Show-Cause**– The Council will issue a show-cause directive against any campus or program that is materially below the Council standard, as defined as below 50% for any student achievement indicator in its current submission. The show-cause directive is an action by which the Council determines that the campus and/or program is materially out of compliance and submit evidence of corrective action to the Council. In addition, the campus and/or program must provide notification of its status to all current and prospective students. As a result of being found out of compliance, the campus and/or program will have one year to bring themselves into compliance with the applicable standard.

**Reporting** – Following the CAR submission if a campus and/or program reports student achievement retention or placement rates or program-level licensure pass rates between 60-70%, it is considered, on student achievement review and reporting. The campus and/or program is required to show improvement and must develop and implement an Improvement Plan that is fully incorporated into the Campus Effectiveness Plan (CEP). The Improvement Plan must include the required elements and may be reviewed during any on-site evaluation visit. In addition, those campuses must attend an ACICS Retention and/or Placement Workshop.

**Compliance Warning** – Following the CAR submission if a campus and/or program reports student achievement retention or placement rates or program-level licensure pass rates between 50-60%, the Council will issue a compliance warning and the campus and/or program will be found out of compliance. A campus and/or program on compliance warning is required to evaluate, analyze and, if necessary, revise the Improvement Plan implemented while on student achievement reporting. The Council reserves the right to request submission of the evaluation and analysis of the Improvement Plan for Council review. As a result of being found out of compliance, the campus and/or program must come in to compliance within the time frame specified in Title II, Chapter 3.

**Withdrawal by Suspension or Termination of a Program** – If a campus does not come into compliance within the time frames specified for compliance warning or show-cause, then the Council will issue a withdrawal by suspension action. The Council will require the campus to submit an ACICS-approved teach-out plan **and teach-out agreement, if applicable**. If a program does not come into compliance within the time frames specified for compliance warning or show-cause, it will be required to cease enrollment and terminate the program of study.

**Data Collection and Verification** – ACICS standards are applied by the Council to data collected from each main and branch campus through the annual Campus Accountability Report (CAR). The Council reviews campus and program-level retention and placement rates and program-level licensure examination pass rates where licensure is

required for employment in the state the campus is located. The CAR reporting year is July 1 to June 30 and placement is accepted through November 1st of the CAR reporting year.

*Please refer to Campus Accountability Report (CAR) Guidelines for details regarding online submission of the annual report, instructions, types of information collected, and calculation formulas.*

#### **OPTIONS**

1. Vote to approve the proposed policy and procedural language and make effective immediately for implementation on the 2016 CAR.
2. Vote to approve the proposed policy and procedural language with amendments and make effective immediately for implementation on the 2016 CAR.

**The amendments are included in the policy language (highlighted in yellow) above.**

3. Make no changes.

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**MOTION:** Option 2

**MOVED:** Swartzwelder

**SECONDED:** Euliano

**ACTION:** Passed

#### **NEW BUSINESS**

#### **VIII. INTENT TO BAR DISCUSSIONS**

##### **1. ITT Technical Institute**

**SUBJECT:** Intent to Bar Action – ITT Technical Institute

**STAFF:** Ms. Katie Morrison

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#### **ISSUE**

Should the Council issue an intent to bar action to Mr. Kevin Modany, Chairman and CEO of ITT Educational Services, Inc. (IESI), and associated senior management personnel and members of the board of directors for IESI because the institution (136 campuses) closed without providing viable teach-outs?

#### **OVERVIEW**

The Council issued a continue show-cause directive letter to ITT Technical Institute (2 main campuses, 134 branch campuses) on August 17, 2016 given the ongoing nature of the adverse information (unresolved civil investigative demands or complaints from the attorneys general of 20 states and the District of Columbia, and unresolved litigation and investigations by the CFPB and SEC) and ITT's responses to Council requests for information that continued to raise questions as to the institutions' administrative capacity, organizational integrity, financial viability, and ability to serve students while in compliance with ACICS standards.

The U.S. Department of Education (DOE) sent a letter on August 25, 2016 indicating the imposition of the following: an increased letter of credit/surety, HCM2<sub>1</sub> payment status, required notification to the DOE of

oversight or financial events, additional reporting and operational requirements. The DOE's decision to impose the above conditions was a result of the its monitoring of ITT's ongoing operations and finances over the past two years, and ACICS' continue show-cause directive to the institutions, which the DOE cited as evidence that they were failing to meet the requirements established by their accreditor, as required by their provisional program participation agreements:

ITT Technical Institute closed on September 6, 2016 (with the exception of the Indianapolis main campus on October 16, 2016, and the Baton Rouge branch campus on September 10, 2016) citing that the DOE rejected ITT's proposed alternatives to the imposed conditions, to include a teach out of ITT's students and the time to sell the schools to another company, and that it had made the decision to discontinue academic operations and cancel the upcoming September quarter after evaluating the impact of the DOE's requirements on the institutions.

ITT supplied ACICS with contingency plans, to include a spreadsheet of comparable programs at potential transfer/teach out institutions, but no teach out plans for its students. The ITT website indicates that it "has articulation agreements with several schools that may provide you with an opportunity to complete your program of study at a different school," and lists the institutions as well as their website addresses, and also lists the same information for "other institutions" that ITT "is working with...to help provide you with an opportunity to complete your program of study at a different school."

\*<http://itt-tech.info/>

\*<https://studentaid.ed.gov/sa/about/announcements/itt>

## **CRITERIA**

### **2-3-900 – Debarment**

The Council may bar a person or entity, including spouses and closely related family groups as defined in Section 2-2-300, from being an owner, senior administrator, or governing board member of an ACICS-accredited institution if that person or entity was found guilty of fraudulent or criminal behavior; was debarred by a government agency or an accrediting agency; or was an owner, senior administrator, or governing board member of an institution that lost its accreditation as a result of a denial or suspension action or that closed without providing a teach-out or refunds to students matriculating at the time of closure.

## **OPTIONS**

1. Issue an intent to bar notice to Mr. Kevin Modany, chairman and CEO of ITT Educational Services, Inc., for a prescribed amount of years.
2. Issue an intent to bar notice to Mr. Kevin Modany and selected senior management personnel/members of the board of directors, as listed below, for a prescribed amount of years:
3. Recommend a different approach to debarment of ITT-related individuals as stated below:
4. Do not issue an intent to debar notice to any ITT-related individuals or groups.

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**MOTION:** Option 4

**MOVED:** Edwards

**SECONDED:** Blake

**ACTION:** Passed

**2. JTC Education Holdings, Inc.**

**SUBJECT:** Intent to Bar Action – Medtech/Radians College – JTC Education Holdings, Inc.

**STAFF:** Ms. Katie Morrison

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**ISSUE**

Should the Council issue an intent to bar action to corporate officers/board of JTC Education Holdings, Inc. because the Medtech College and Radians College institutions closed without ensuring teach-outs for all students?

**OVERVIEW**

The Council was informed that the mid-Atlantic campuses of Medtech Institute, located in Washington, DC, Falls Church, VA, and Silver Spring, MD, and accredited by the COE, were closing as a result of the U.S. Department of Education’s action to deny their recertification application to participate in Title IV programs. This action came from the DOE’s conclusion that placement data from these campuses were overstated and misrepresented, as gathered through an audit.

Therefore, ACICS took the initiative to conduct visits to the ACICS-accredited Medtech College main campus in Indianapolis, IN [ACICS ID 00021231] and Radians College [ACICS ID 00033239] campus in Washington, DC in response to financial concerns for the institution, as the closed campuses of Medtech Institute fell under the same ownership of Medtech College and Radians College – that of JTC Education Holdings, Inc. – and that the campuses had undergone a similar assessment of placement information that had pending results. There were also concerns about the nursing program at Radians College and an open complaint about Radians College.

Information from both visits indicated that a purchase of the schools from JTC Education Holdings, Inc. (JTC) could occur and was being pursued by JTC. Specifically, LTT Enterprises, the owner of a Medtech school in Florida, was entertaining the idea of the purchase of the Medtech College institution (1 main, 3 branches) if it would not be required to post a letter of credit. During the visits, LTT Enterprises was awaiting a response from the DOE about this item. After the visits, ACICS received an update from Medtech College and Radians College; the purchase did not occur and Medtech College campus in Lexington, KY ceased operations on August 23, 2016 to be followed by Radians College and the other Medtech College campuses on September 23, 2016.

Radians College did not provide a suitable plan for the teach-out of the students. The only information as to options for the Radians students was a note in the communication to students that it was “coordinating with Stratford College, Washington Adventist University and PN schools in the District of Columbia to offer transfer options.” As anticipated as a potential outcome, Medtech College commenced a partnership with Harrison College for the benefit of its Indianapolis, Greenwood, and Fort Wayne, Indiana campus students. Students would have the option to continue their education with Harrison College, if possible. Harrison College was applying to the Indiana State Board of Nursing and Indiana Board for Proprietary Education to offer a practical nursing program and dental assistant program for the purpose of the teach out. However, no complete teach-out plan was submitted to ACICS, only an articulation and memorandum of understanding dated August 24, 2016 between Harrison College and JTC. The only service offered for Medtech students at the Lexington, KY campus was waived application fees for students who wished to continue their education at Spencerian College.

The board of directors of JTC Education Holdings, Inc. consists of Mr. Patrick O’Keefe and Ms. Gail Myers. Mr. William Winkowski is the CEO of JTC. It should be noted that all notifications of the closures were signed by Mr. Patrick O’Keefe.

## **2-3-900 – Debarment**

The Council may bar a person or entity, including spouses and closely related family groups as defined in Section 2-2-300, from being an owner, senior administrator, or governing board member of an ACICS-accredited institution if that person or entity was found guilty of fraudulent or criminal behavior; was debarred by a government agency or an accrediting agency; or was an owner, senior administrator, or governing board member of an institution that lost its accreditation as a result of a denial or suspension action or that closed without providing a teach-out or refunds to students matriculating at the time of closure.

### **OPTIONS**

1. Issue an intent to bar notice to Mr. Patrick O’Keefe and Ms. Gail Myers, board of directors, and Mr. William Winkowski, CEO of JTC Education Holdings, Inc., for a prescribed amount of years.
2. Recommend a different approach to debarment of Medtech/Radians/JTC-related individuals as stated below:
3. Do not issue an intent to debar notice to Mr. O’Keefe, Ms. Myers, and Mr. Winkowski or other related individuals or groups.

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**MOTION:** Option 3

**MOVED:** Fateri

**SECONDED:** Bennett

**ACTION:** Passed

**ABSTAINED:** Fund

### **3. MBTI Business Training Institute**

**SUBJECT:** Intent to Bar Action – Ms. Barbara Alonso, MBTI Business Training Institute

**STAFF:** Ms. Katie Morrison

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### **ISSUE**

Should the Council issue an intent to bar action to Ms. Barbara Alonso, President and CEO of MBTI Business Training Institute, because the institution closed without providing teach-outs and refunds to all students?

### **OVERVIEW**

The Council was informed on Monday, September 26, 2016, via e-mail, that the MBTI Business Training Institute (MBTI) in Puerto Rico [main ID 00010107, branch campus IDs 00039406, 00039407, and 00070623] institution would be closing on Friday, September 30, 2016. However, ACICS received other information that the campuses had already been closed and students were not being given assistance or information from the school. Given the urgency, an ACICS representative located in PR was contracted to conduct a visit to the main campus in Santurce, PR. The state representative was also contacted and invited to attend.

The ACICS representative arrived at the MBTI main campus on Wednesday, September 28, 2016 to find the doors closed and several police officers and others standing outside; the institution's main frame was not working (due to a blackout on the island of PR), in order to be able to provide students with their transcripts, which led to aggressive hostility from students and a call to the police. The ACICS representative then met with an MBTI consultant at the MBTI central office a block away. Based on the information gained from conversation with the consultant and e-mails from the institution, the details of the closing are as follows:

The U.S. Department of Education placed MBTI on Heightened Cash Monitoring 2 on or about July 1, 2016.

Ms. Barbara Alonso became president of the institution effective July 18, 2016, and two of the institution's top executives were let go after an internal preliminary investigation.

While the campuses have been operating, all academic activities at all four campuses had been discontinued since September 15, 2016 (and the academic term was scheduled to be completed on October 20, 2016). First, an academic recess was declared for the week of September 19, and then the institution notified the Consejo de Educación de Puerto Rico (CEPR) on September 21 of its intent to terminate operations by September 30, 2016.

The institution had been in continuous communication with the CEPR and was going to provide it and ACICS with a list of students who were enrolled at the time of closing along with their available financial aid balance, those who were able to transfer, and those who could not be transferred or located.

As of September 28 during the visit, the Fajardo and Bayamón campuses were permanently closed, the Mayaguez campus would remain open to provide transcripts to those students who request them, and the Santurce main campus would reopen on Friday, September 30 to serve students from the Fajardo, Bayamón, and Santurce campuses. CEPR staff were going to attend this event, and both the institution and CEPR invited ACICS to do so as well. However, MBTI decided on September 29 not to open any of its campuses as it could not assure the safety of its staff (ex. students at the Mayaguez campus got in, injured the registrar, and started to take their files). The CEPR was informed of and amicable to this decision. MBTI would set up an e-mail address to manage all requests for those who need copies of their transcripts and issue a press release with details.

Ms. Alonso was the person who had final authority for the closing of all MBTI campuses. She indicated, over the phone, that MBTI did not submit a teach-out plan due to the limited time frame. Instead, MBTI had contacted and invited different schools to offer transfer and admissions services to the students. ACICS was able to verify that other institutions had been on all campuses on September 26 and at the Santurce main campus on September 28. Institutions in attendance were EDIC College, IBC, ICPR, Edutech, Cambridge Technical Institute, Universidad Interamericana, POPAC, EDP University, and Humacao Community College.

There were approximately 1,200 students enrolled at the institution at the time of closing.

## **CRITERIA**

### **2-3-900 – Debarment**

The Council may bar a person or entity, including spouses and closely related family groups as defined in Section 2-2-300, from being an owner, senior administrator, or governing board member of an ACICS-accredited institution if that person or entity was found guilty of fraudulent or criminal behavior; was debarred by a

government agency or an accrediting agency; or was an owner, senior administrator, or governing board member of an institution that lost its accreditation as a result of a denial or suspension action or that closed without providing a teach-out or refunds to students matriculating at the time of closure.

## OPTIONS

1. Issue an intent to bar notice to Ms. Barbara Alonso, President and CEO of MBTI Business Training Institute, for a prescribed amount of years.
2. Recommend a different approach to debarment of MBTI-related individuals as stated below:

Issue an intent to bar notice for the board members of MBTI Business Training Institute for 10 years to include:

Ms. Barbara Alonso  
Mr. Fidel C. Alonso  
Ms. Paulette Alonso  
Ms. Sharline Alonso

3. Do not issue an intent to debar notice to Ms. Alonso and/or other MBTI-related individuals or groups.

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**MOTION:** Option 2

**MOVED:** Bennett

**SECONDED:** Fateri

**ACTION:** Passed

**ABSTAINED:** Ramirez-Rivera

4. **Missouri College**

**SUBJECT:** Intent to Bar Action – Earl Weston, CEO – Missouri College

**STAFF:** Ms. Katie Morrison

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## ISSUE

Should the Council issue an intent to bar action to Mr. Earl Weston, CEO of Weston Education Group and sole shareholder of Missouri College because the campus (the only one) in Brentwood, MO closed without supplying the students and ACICS with an appropriate teach-out plan?

## OVERVIEW

The Council was informed on Wednesday, November 2, 2016, by the national director of accreditation for Heritage College/Heritage Institute/Missouri College that Missouri College (MC) in Brentwood, MO closed on November 1, 2016 at 5:00 pm. The director provided the Council with a written notification of the closure from Mr. Earl Weston, and requested that Mr. Weston be informed of any additional requirements that the campus would need to complete for ACICS for its closing, beyond completing a teach-out application. The written notification included the following information: 1) MC has been engaged in the process of sending e-mails with the closure notice to all currently enrolled students, but some of the students hadn't yet received the notice due to a script error, and the campus resolved the program and resent the notice to all students; 2) MC was working on locating other institutions to teach-out their students, and contact had been made with varying state associations

and individual institutions that might provide assistance with the development of a teach-out plan. MC would provide a formal teach-out plan in the coming days; and 3) Mr. Earl Weston's mailing address and phone number.

The Council e-mailed the contact person to follow-up on a teach-out plan, but the e-mail bounced back. No documentation has been uploaded by the campus to the campus closure application that ACICS created.

### **2-3-900 – Debarment**

The Council may bar a person or entity, including spouses and closely related family groups as defined in Section 2-2-300, from being an owner, senior administrator, or governing board member of an ACICS-accredited institution if that person or entity was found guilty of fraudulent or criminal behavior; was debarred by a government agency or an accrediting agency; or was an owner, senior administrator, or governing board member of an institution that lost its accreditation as a result of a denial or suspension action or that closed without providing a teach-out or refunds to students matriculating at the time of closure.

### **OPTIONS**

1. Issue an intent to bar notice to Mr. Earl Weston for a prescribed amount of years.
2. Recommend a different approach to debarment of Mr. Weston as stated below:
3. Do not issue an intent to debar notice to Mr. Weston.

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### **MOTION: Option 1 for a period of 10 years**

**MOVED:** Bennett  
**SECONDED:** Shafer  
**ACTION:** Passed

## **STANDING COMMITTEE REPORTS**

### **BUSINESS PRACTICES COMMITTEE MINUTES**

Tuesday, December 6, 2016

**10:30AM – 12:00PM**

#### **COMMITTEE MEMBERS**

Mr. Luis Llerena, Chair  
Mr. Richard Bennett  
Dr. Fardad Fateri  
Mr. Jay Fund  
Dr. Ruth Shafer  
Dr. Edward Thomas

#### **STAFF LIAISONS**

Ms. Perliter Walters-Gilliam – Primary Liaison

Ms. Jan A. Chambers – Secondary Liaison

**OTHER**

Ms. Karly Zeigler  
Ms. Katie Morrison  
Ms. Linda Lundberg  
Mr. Maurice Wadlington  
Mr. Quentin Dean  
Mr. Roger Williams  
Mr. Ian Harazduk (observer/former ACICS Staff)  
Ms. Judee Tim (observer)  
Commissioner Deborah Jones

**CALL TO ORDER**

Chair Llerena called the meeting to order at 12:32pm on Tuesday, December 06, 2016.

**OLD BUSINESS**

**1. LEARNING SITE DEFINITIONS/PROCEDURES – BPC/12.16/1**

**ISSUE**

Learning sites with located in different marketing areas, impacts the ability of ACICS and the school to adequately report student outcomes from that specific location.

**OVERVIEW**

*The current definition of a learning site does not restrict distance from the managing campus or the percent of a program to be offered at the learning site. Currently learning sites have been approved in states and even other countries separate and apart from the managing campus with a full program of study and administrative staff services provided via online methods.*

**Accountability:** *Is there sufficient accountability of student achievement and financial outcomes when students of programs that are offered at a learning site are rolled-up into the managing campuses rates?*

**Expectations:** *Are member institution’s meeting residential student expectations if the support services are offered via online or remotely through a kiosk format? Can expectations be met if member institutions are required to fully disclose how each administrative support role would be made available to a prospect student prior to enrollment and in the catalog?*

The Council moved to accept the proposed policy at the August 2016 (remote) EEE meeting and publish it in the September Memo to the Field.

**CRITERIA**

**1-3-103. Learning Site.** A learning site is an extension of a main campus or branch campus that is ~~apart from the managing location within a five mile radius of the managing campus; offers less than 50% of a program of study; and maintains academic quality by is capable of providing~~ providing sufficient academic and administrative oversight ~~providing and~~ access to all student services and instructional resources.; ~~and maintaining required to academic quality.~~ Learning sites that are greater than five miles from the managing campus and offer student transportation to the managing campus; or are used for

delivery of distance education activity or collaborative arrangements with other entities for specific on-site educational activity must be approved by the Council on a case-by-case basis and are subject to a quality assurance visit as specified by the Council. All learning sites are subject to an onsite evaluation visit during the managing campus renewal of accreditation evaluation visit.

Staff Zeigler presented the most recent learning site definition, previously brought before the Education Enhancement and Evaluation (EEE) Committee and accepted by the full Council August 2016; the definition will take effect on January 1, 2017. The Call for Comment survey completed by member institutions in response to the September 2016 Learning Site Definition Memo to the Field was also provided by Staff Zeigler (**Appendix A**). BPC discussed the relevance of the distance from the learning site to the oversight campus and determined that the Executive Committee will review, on a case-by-case basis, any application submitted for a new learning site beyond a 5 mile radius from the oversight campus. Campuses currently with learning sites farther than 5 miles from the oversight campus must comply with the proposed Criteria by January 1, 2018. Another memo will be sent to the field informing institutions of the additional January 2018 date.

PPG Technical Institute sent a letter on December 6, 2016 requesting clarification from the Council regarding the learning site definition (**Appendix B**). The institution applied for a learning site and was previously denied. The letter made note of the Executive Committee's decision to approve a learning site for another member institution (Computer Systems Institute) in September 2016 which was 900 miles away from its oversight campus. The committee and staff discussed the factors involving the approval of the learning site approval and resolved that the contexts for that particular approval were not standard, but were under mitigating circumstances.

- MOTION: Accept the proposed policy and publish it in the *Accreditation Criteria* effective January 1, 2017; furthermore, allowing institutions with current learning sites until January 1, 2018 to comply with the new standard.
- MOVED: Bennett
- SECONDED: Schafer
- ABSTENTION: None
- ACTION: Passed

## 2. AT-RISK INSTITUTION GROUP (ARIG) REPORT

Staff Walters-Gilliam provided an overview of the current ARIG membership (consisting of Staff Chambers, Dean, Gelfound, King, Walters-Gilliam, Williams, and Zeigler). Over the projector, Staff Walters-Gilliam displayed the spreadsheet ARIG uses to track the progress of member institutions, along with Unannounced/At-Risk/Special visits directed by the group.

## 3. REPORT ON COMPLAINTS

Staff Chambers briefly summarized the complaint activity for the year and quarter, stating that former students of member institutions filed the most complaints, stated the average complaint processing time for the quarter was 14 days and an average of 32 days for the year. Commissioner Llerena suggested that a chart comparing open vs. closed complaints be provided as was provided in previous meetings.

**Average Processing Time: August 1, 2016 - December 6, 2016**

Complaint 14 days

**Average Processing Time: January 1, 2016 - December 6, 2016**

Complaint 32 days

**Total number of complaints: August 1, 2016 - December 6, 2016**

State Regulatory Agency	4
Student	18
Former Student	28
Faculty	3
Former Faculty	8
Anonymous	1
Other	6
<b>Total</b>	<b>68</b>

**Total number of complaints: January 1, 2016 - December 5, 2016**

State Regulatory Agency	4
Federal	1
Student	65
Former Student	92
Faculty	13
Former Faculty	42
Parent	2
Administrator	4
Anonymous	2
Other	21
<b>Total</b>	<b>246</b>

**4. REPORT ON ADVERSE INFORMATION**

Staff Walters-Gilliam presented the Report on Adverse Information and provided updates for all open adverse cases (**Appendix C**). There are currently 14 open adverse cases. Staff Walters-Gilliam also shared that Globe University’s main campus received a letter from the Department of Education on December 6, 2016 informing them that they will not recertify the institution’s Title IV.

ADD REPORT ON ADVERSE NOTES HERE

**NEW BUSINESS**

- **FAILURE TO SUBMIT A RENEWAL APPLICATION – TAKING A REVOCATION ACTION**

Staff Walters-Gilliam provided information that Silicon Valley University and New York Institute of English and Business had not yet submitted a 2016 CAR or Self-Study despite several conversations and reminders provided by staff. Staff Walters-Gilliam recommended a suspension action based upon Section 2-3-402 in the Criteria. The committee challenged the recommendation and decided to recommend sending another letter to the campuses providing 10 days for them to take action (submit the

renewal application and self-study, give notice of withdrawal, etc.). If no response is provided by the campuses, it is recommended that the Executive Committee suspend the campuses' grant of accreditation.

#### **ADJOURNMENT**

Chair Llerena motioned for adjournment which was seconded by Commissioner Fateri. The Committee adjourned the meeting at 1:50pm.

### **EDUCATION ENHANCEMENT AND EVALUATION COMMITTEE AGENDA**

**Monday, December 5, 2016**

**3:00 PM – 4:30 PM**

#### Committee Members

Ms. Julie Blake, Chair

Ms. Michelle Edwards

Mr. Jay Fund

Dr. Adriene Hobdy

Dr. Deborah Jones

Dr. Rafael Ramirez-Rivera

Dr. Edward Thomas

#### Staff Liaisons

Dr. Terron King – Primary Liaison

Ms. LaToya Boyd – Secondary Liaison

#### Other

Dr. Judee Timm

Ms. Niana Moore

Mr. Maurice Wadlington

Ms. Anne Bennett

Ms. Linda Lundberg

Mr. Ian Harazduk

Ms. Perliter Walters-Gilliam

Mr. Steven Gelfound

Ms. Katie Morrison

Ms. Karly Zeigler

## **I. CALL TO ORDER**

Chair Blake called the meeting to order at 3:30 PM., December 5, 2016

## **II. OLD BUSINESS**

### **1. Workshop Report      Walters-Gilliam**

Staff Walters-Gilliam provided an update on workshops held since the August 2016 Council meeting.

Overview: Three workshops were presented. Two of the workshops were for renewals, with 33 and 34 participants in attendance respectively. The third was a CEP workshop with 37 total participants. The workshops were conducted by staff Hartman and staff Zeigler.

### **2. COMMITTEE:      EEE/8.16/1**

**DATE:**      December 5, 2016

**SUBJECT:**      **Defining Basic Records**

**STAFF:**      Dr. Terron King

### **ISSUE**

Policies regarding records maintenance and retention require clarification; specifically, defining what the Council regards as “basic” records.

### **OVERVIEW**

In reference to **Section 3-1-303(f)(g) and Glossary**, there is confusion in the field regarding the requirements for records retention. Specifically, it is not clear which records must be protected and maintained and for how long.

One approach may be to require the institution to have a policy for record retention and for the Council to provide general guidelines.

The Council directed the staff to conduct research on student records. The Council suggested reviewing and receiving guidance from AACRAO (particularly on the retention of student records). The Council also suggested that upon this review the *Criteria* language will need to be updated. Specifically, the language should define the “basic” record for protection (to include the academic record, financial aid record, application materials, and counseling [for purposes of accreditation and program reviews]). There should be a separate definition for the basic record as it deals with maintenance, which should include the permanent academic record.

In addition, the Council noted that some agencies, such as States and Title IV, have their own standard for records retention policies and ACICS should have a flexible enough policy to accommodate those rules.

### **Section 3-1-303. Records.**

(f) All basic records and reports pertaining to students shall be safely protected. Records shall be stored consistently in a manner that provides protection against misuse, misplacement, damage, destruction, or theft. Acceptable methods of protecting records from theft, fire, water damage, or other possible loss include electronic records management systems and software, appropriately fire-rated file cabinets (that can be and are locked when not being used); a central location such as a vault, the entirety of which is protected; and microfilmed records, computer disk, backup tape, printout records, or other hard copies of records protectively stored off the premises.

(g) Certain basic records shall be maintained by the institution for a specified period of time. The institution shall adopt and publish a policy on the responsibility and authority of the institution to properly maintain and retain such records. At a minimum, the policy should address the following document retention requirements:

1. Transcripts Academic records should shall be kept maintained indefinitely permanently (see *Record, Permanent Academic* in Glossary);
2. Admissions data and other advisement records should shall be kept for at least five years from graduation or the last day date of attendance(see *Record, Admissions and Advisement* in Glossary);
3. Financial aid records shall be maintained according to the record retention policies and guidelines established by the funding source (see *Record, Financial Aid* in Glossary).

The institution shall comply with its published policy on records maintenance and retention.

### **Glossary of Definitions**

**Record, Admissions and Advisement.** Official documents of admissions data, counseling, and advising. Such documents include but are not limited to, applications for admission or readmission (for matriculants), admissions letters, denial and waitlist notifications, aptitude/assessment test scores, military records, degree audit records, transfer credit evaluations, transcripts reflecting degrees earned from other institutions, and counseling and advising correspondence.

**Record, Permanent Academic.** The oOfficial documents on which is listed the courses attempted, grades and credit earned, and status achieved by a student of the student’s scholastic progress. Such documents include, but

are not limited to, official transcripts; final grade reports detailing each course code, course title, and final grades for a given year and term; and any documented change to final grades.

**Record, Financial Aid.** Official documents regarding any grant, scholarship, or loan offered to assist the student in meeting college expenses. Documentation may vary depending upon the funding source (e.g. state or federal programs, high schools, foundations, or corporations).

**Record, Student.** A record (electronic or hard-copy) which is comprised of, at a minimum, a student's admissions and advisement, permanent academic, and financial aid records. A file which may contain the following: a record of the student's scholastic progress, the extracurricular activities, personal characteristics and experiences, family background, secondary school background, aptitudes, interests, counseling notes, etc.

## OPTIONS

1. Vote to approve the proposed policy presented below and publish it as final language in the Memorandum to the Field.
2. Vote to approve the proposed policy with amendments shown below and publish it as final language in the Memorandum to the Field:
3. Recommend a different approach to policy issue as stated below:
4. Remove from further consideration.

**RECOMMENDATION:** Option 1

**MOVED:** Commissioner Hobby moved to accept option 1 as proposed

**SECONDED:** Commissioner Jones moved to second the motion

3. **COMMITTEE:** EEE/12.16/2

**DATE:** December 5, 2016

**SUBJECT:** **Library, Instructional Resources and Technology**

**STAFF:** Dr. Terron King

## ISSUE

The following proposed revisions to the Accreditation Criteria for Library, Instructional Resources and Technology are being recommended:

- Revision of outdated technology language.
- Revision of language to allow for a centralized library budget for multiple campuses.

- Addition of language requiring campuses to have a physical library resource center on-site or within close proximity to the institution.

## OVERVIEW

The Library, Instructional Resources and Technology sections of the Accreditation Criteria were one of the focus areas of ACICS' 2014 Systematic Review. This item was discussed during the 2015 Policy Meeting and an ad hoc committee was created to work with staff on the revision of the language to bring back to the February 2016 Policy Meeting for further discussion.

## CRITERIA

### 3-1-800 – Library Resources and Services

The adequate provision of library resources and information services, appropriate to the academic level and scope of an institution's programs, is essential to teaching and learning. It is incumbent upon all member institutions to assess the level of library resources needed in relation to their programs and to provide a range of support to meet these needs. The size of collections and the budget allowed for library resources and services do not ensure adequacy. The quality, relevance, accessibility, availability, and provision of support services ultimately will determine the adequacy of an institution's efforts. In assessing library resources and services, ACICS requires that an institution, at a minimum, shall:

(a) develop an adequate base core of library resources to support academic success and to meet instruction and research needs as appropriate;

(b) ensure up-to-date means to access these resources;

(c) develop a continuous assessment strategy for library resources and information services that includes staff and faculty;

(d) provide adequate staff to support assessment, library development, collection, organization, and accessibility;

(e) ensure that library services are provided to all learners, including those at nonmain campuses and those online;

(f) provide training and encouragement for students and faculty to utilize library resources as an integral part of the learning process and as life-long learners; and

(g) those campuses that have a residential component, must provide students a physical space on site or within close proximity to the institution in order to allow for access to library resources and services;

### 3-2-200 – Instructional Resources, Materials

The instructional resources, audiovisual teaching equipment, and instructional materials shall be adequate to serve the needs of the institution's educational programs. The resources shall be consistent with the institutional mission and include current print or digital titles, periodicals, professional journals, and/or full-text online resources appropriate for the institution's educational programs. There shall be evidence that appropriate instructional resources, equipment, technology, and materials are utilized to support the educational objectives.

**3-2-201. *References.*** The institution shall have available and easily accessible to faculty and students standard print, digital, or online reference works appropriate to the curriculum. Major consideration will be given to the diversity of the collection including variety of volumes books, periodicals, online resources and information technology readily available to students and faculty, recency their currency of publications, appropriateness, and relevance to the programs offered by the institution.

#### **Budget (at all credentials)**

**3-2-204. *Budget.*** Budget allocations and expenditures for instructional resources, equipment, and materials may be centralized and shall be sufficient to meet the needs and fulfill objectives of the institution's programs.

**3-3-402, 3-4-402, 3-5-402, 3-6-702, 3-7-702. *Budget.*** An annual library budget, appropriate to the size and scope of the institution and the programs offered, shall be established, may be centralized, and the allocation expended for the purchase of books, periodicals, library equipment, print and/or digital books, periodicals, and other resource and reference materials.

#### **Function (at all credential levels)**

**3-3-403. *Function.*** The library function is shaped by the mission and the educational programs of the institution. Appropriate reference, research, and information resources must be made available to enhance, augment, and support the curricular and educational offerings. The resources shall include the study, reading, and information technology facilities necessary to make the educational programs effective. The ultimate test of the library's adequacy is determined by the extent to which its resources support all the courses offered by the institutions.

**3-4-403, 3-5-403. *Function.*** The library function is shaped by the mission and the educational programs of the college. Appropriate reference, research, and information resources must be made available to provide basic support for curricular and educational offerings and to enhance student learning.

**3-6-703. *Function.*** The library function is shaped by the mission and the educational programs of the institution. Institutions offering master's degree programs shall provide access to substantially different library resources in terms of their depth and breadth from those required for baccalaureate degree programs. Students should discover information in a variety of formats with an appropriately supporting information technology infrastructure.

These resources shall include bibliographic and monographic references, major professional journals and reference services, research and methodology materials, and, as appropriate, information technologies. The depth and breadth of the accessible library holdings shall be such as to exceed the requirements of the average student in order to encourage the intellectual development of superior students and to enrich the professional development of the faculty.

Appropriate reference, research, and information resources must be made available to enhance, augment, and support the curricular and educational offerings and to enhance student learning. The resources shall include the study, reading, and information technology facilities necessary to make enhance the effectiveness of the educational programs effective.

**3-7-703. Function.** The library function is shaped by the mission and the educational programs of the institution. Institutions offering master's degree programs shall provide access to substantially different library resources in terms of their depth and breadth from those required for baccalaureate degree programs. Students demonstrate the ability to define problems, access, evaluate, and analyze a variety of resources, and use retrieved information ethically.

These resources shall include bibliographic and monographic references, major professional journals and reference services, research and methodology materials, and, as appropriate, information technologies. The depth and breadth of the accessible library holdings shall be such as to exceed the requirements of the average student in order to encourage the intellectual development of superior students and to enrich the professional development of the faculty.

Appropriate reference, research, and information resources must be made available to enhance, augment, and support the curricular and educational offerings and to enhance student learning. The resources shall include the study, reading, and information technology facilities necessary to make enhance the effectiveness of the educational programs effective.

#### **Use and Accessibility (at all credential levels)**

**3-3-404. Use and Accessibility.** In evaluating the use of library resources by students, consideration shall be given to accessibility and to methods used by the faculty to encourage the use of these resources by students. Records of physical and/or online circulation and inventory shall be current and accurate.

Physical and/or online library materials and services must be available at times consistent with the typical student's schedule in both day, and evening, and online programs. Easy access to and use of reference materials, periodicals, and information technology are of prime importance in determining if the institution is meeting the educational needs of its students and faculty. If online resources are utilized, an appropriate number of terminals and/or wireless access shall be provided for student use. Interlibrary agreements are not substitutes for an institution's library, but rather a means to supplement the institution's holdings in limited areas. In determining the appropriateness of such agreements, consideration will be given to the uniqueness of the lending library's collection, provisions for interlibrary loans, and the degree of accessibility to the students.

**3-4-404, 3-5-404, 3-6-704, 3-7-704. Use and Accessibility.** The faculty should inspire, motivate, and direct student usage of the library resources. The library's adequacy ultimately is determined by the extent to which physical and/or online resources including full-text resources support all the courses offered by the institution.

For library resources, the Dewey Decimal System, Library of Congress classification system, or other appropriate system of classification should be used. Records of physical and/or online circulation and inventory shall be current and accurate and must be maintained to assist staff and faculty in evaluating the adequacy and utilization of the physical and/or online resources including full-text holdings.

Physical and/or online, full-text library materials and services must be available at times consistent with the typical student's schedule in both day, and evening, and online programs. If online or computer based resources are computer software is utilized on site, a sufficient number of terminals and/or wireless access shall be provided for student use. If interlibrary agreements are in effect, provisions for such use must be practical and accessible and use must be documented. In determining the appropriateness of such agreements, consideration will be given to the nature of the participating library's collection, provisions for interlibrary loans, and the degree of

accessibility to the students. A college's library must contain, at a minimum, a core collection of physical and/or online resources including full-text reference materials appropriate for the offerings of the institution.

### **Holdings (at all credential levels)**

**3-3-405. Holdings.** The institution shall have available and easily accessible standard physical and/or online reference works, professional journals, and current periodicals appropriate to the curriculum. Consideration also shall be given to supplementary library resources contracted by the institution and online resources available to its student body.

**3-4-405, 3-5-405. Holdings.** A collegiate library shall contain up-to-date physical and/or online resources including full-text titles appropriate for the size of the institution and the breadth of and enrollment in its educational programs. The library collection shall include holdings on the Humanities, Arts, Social Sciences, and Sciences, including mathematics; magazines and essential professional journals and periodicals; and, when appropriate, online data networks and retrieval systems, CD-ROMs, and interactive research systems that support all of the course offerings of the institution.

**3-6-705. Holdings.** The library shall support the academic programs and the literacy, intellectual, and cultural development of students, faculty, and staff; shall provide current and appropriate physical and/or online, full-text resources for the size of the institution and the breadth of and enrollment in its educational programs; shall provide, when appropriate, on-line data networks and retrieval systems, CD-ROMs, and interactive research systems; and shall be capable of supporting an understanding of the methods and principles of scholarly research and how to use information ethically and/or scholarly research at the graduate level.

**3-7-705. Holdings.** The library shall support the academic programs and the intellectual and cultural development of students, faculty, and staff; shall provide current and appropriate physical, digital, and/or online full-text resources for the size of the institution and the breadth of and enrollment in its educational programs; shall provide, when appropriate, physical and/or on-line, full-text data networks and retrieval systems, CD-ROMs, and interactive research systems; and shall be capable of supporting scholarly research at the graduate doctoral level.

### **Staffing (at all credential levels)**

**3-4-401, 3-5-401. Staff.** A professionally trained individual shall supervise and manage library and instructional resources, facilitate their integration into all phases of the institution's curricular and educational offerings, and assist students in their use. A professionally trained individual is one who holds a bachelor's or master's degree in library or information science or a comparable program, or state certification to work as a librarian, where applicable, or, for foreign institutions, who holds a bachelor's or master's degree recognized as appropriate for the position by its government or higher education authority. The institution must provide evidence that the degree is from an institution accredited by an agency recognized by the United States Department of Education. If the degree is from an institution outside of the United States, the institution must be recognized by its government as an institution of higher education or be evaluated by a member of the Association of International Credentials Evaluators (AICE), the American Association of Collegiate Registrars and Admissions Officers (AACRAO), or the National Association of Credential Evaluation Services (NACES) to determine the equivalency of the degree to degrees awarded by institutions in the United States. ACICS, if unable to determine qualifications, may require

the translation and/or evaluation of transcripts in languages other than English. The professionally trained individual must participate in documented annual professional growth activities.

During library hours that are scheduled and posted, there shall be a trained individual on-site who is assigned to oversee and to supervise the library and to assist students with library and information services. This individual shall be competent and technologically literate to use and to aid in the use of the online and computer based library technologies and resources.

**3-6-701, 3-7-701. Staff.** A professionally trained individual shall supervise and manage library and instructional resources, facilitate their integration into all phases of the institution's curricular and educational offerings, and assist students in their use. A professionally trained individual is one with special qualifications to aid students in research and who holds a M.L.S. degree or the equivalent, or, for foreign institutions, who holds a master's degree recognized as appropriate for the position by its government or higher education authority. The institution must provide evidence that the degree is from an institution accredited by an agency recognized by the United States Department of Education. If the degree is from an institution outside of the United States, the institution must be recognized by its government as an institution of higher education or be evaluated by a member of the Association of International Credentials Evaluators (AICE), the American Association of Collegiate Registrars and Admissions Officers (AACRAO), or the National Association of Credential Evaluation Services (NACES) to determine the equivalency of the degree to degrees awarded by institutions in the United States. ACICS, if unable to determine qualifications, may require the translation and/or evaluation of transcripts in languages other than English. The professionally trained individual must participate in annual documented professional growth activities.

There shall be a professionally trained individual on duty for sufficient hours, as published by the institution, to support the programs and to assist students with library functions and research. This individual shall be competent both to use and to aid in the use of the physical, computer based, digital and online library technologies and resources.

## **Appendix H- Principles and Requirements for Nontraditional Education**

### **Resources and Equipment**

(b) The institution must demonstrate that students taking online courses have access to the same or equivalent library resources and support as students taking courses in a physical classroom. If the majority of a student's classes are online, these resources must include at a minimum access to a virtual library collection of program-related books, journals, and periodicals, and access to virtual library and information technology services.

### **OPTIONS**

1. Vote to approve the proposed policy presented below and publish it as final language in the Memorandum to the Field.
2. Vote to approve the proposed policy with amendments shown below and publish it as final language in the Memorandum to the Field:
3. Recommend a different approach to policy issue as stated below:
4. Remove from further consideration.

**RECOMMENDATION:** Option 1

**MOVED:** Commissioner Edwards moved to accept option 2 as amended

**SECONDED:** Commissioner Ramirez-Rivera moved to second the motion

**ABSTENTION:** Commissioner Hobdy abstained from the discussion and voting

**AMENDMENT:** Commissioner Edwards proposed the following amendment to option 2:

#### **Appendix H- Principles and Requirements for Nontraditional Education**

##### **Resources and Equipment**

(b) The institution must demonstrate that students taking online courses have access to the same or equivalent library resources and support as students taking courses in a physical classroom. If 50 % or more of the student's program is approved for online delivery the majority of a student's classes are online, these resources must include at a minimum access to a virtual library collection of program-related books, journals, and periodicals, and access to virtual library and information technology services.

4. **COMMITTEE:** EEE/12.16/3

**DATE:** December 5, 2016

**SUBJECT:** Faculty Field Preparation

**STAFF:** Dr. Terron King

##### **ISSUE**

The following proposed revisions to the Accreditation Criteria for Faculty Field Preparation are being recommended:

- Revision of dated fields of preparation for faculty to provide membership with current examples of field preparation.
- Revision of language to replace “academic term” to address institutions offering modules within an academic term.

##### **OVERVIEW**

Faculty sections of the Accreditation Criteria were one of the focus areas of ACICS' 2014 Systematic Review. This item was discussed during the 2015 Council meetings and staff was directed to bring it back to the February 2016 Policy Meeting for further discussion.

##### **CRITERIA**

**3-2-102. Field Preparation.** Assignments requiring more than three preparations in different fields (e.g., allied health, business, criminal justice secretarial studies, business administration, data processing) shall not be given to an instructor at any given time during one academic term.

## OPTIONS

1. Vote to approve the proposed policy presented below and publish it as final language in the Memorandum to the Field.
2. Vote to approve the proposed policy with amendments shown below and publish it as final language in the Memorandum to the Field:
3. Recommend a different approach to policy issue as stated below:
4. Remove from further consideration.

**RECOMMENDATION:** Option 1

**MOVED:** Commissioner Thomas moved to accept option 1 as final

**SECONDED:** Commissioner Edwards moved to second the motion

5. **COMMITTEE:** EEE/12.16/04

**DATE:** December 5, 2016

**SUBJECT:** **Workshop Attendance Timeframe**

**STAFF:** Ms. Katie Morrison

## ISSUE

There is currently a restriction of the timeframe for which attendance at a workshop will be accepted during the evaluation cycle.

## OVERVIEW

The intent of this requirement is to ensure that the membership, for each reevaluation cycle, is adequately informed on policy and procedural changes that may affect the review. Historically, the “self-study” was interpreted as the application for a new grant. However, this has since been revised and updated to include the submission of a number of documents at different times up until the actual visit.

Further, recognizing the unpredictability of personnel change, attendance at a workshop up until the visit itself has been accepted. Further, if this requirement was not met, a finding would be issued and attendance after the fact would be needed. This conflicts with the original intent of the workshop attendance. Both policy and procedural changes may be necessary to resolve the ongoing confusion.

This item was moved from the April 2016 to August 2016 meeting agenda. The Council moved to accept the proposed policy at the August 2016 (remote) meeting and publish it in the Memo to the Field.

## **CRITERIA**

### **2-1-100 – Accreditation Workshop Requirements**

The Council schedules accreditation workshops each year. Applicants for initial or renewals of accreditation are required to attend a workshop. During these workshops, Council representatives will consult with institutional representatives to help them understand and complete the process. Institutional representatives are required to attend an accreditation workshop within 18 months prior to the final submission of the evaluation visit materials self-study. For initial applicants, the chief on-site administrators of main campuses and all branch campuses are required to attend. For currently accredited institutions, the chief on-site administrators or the renewal self-study coordinators for single campus institutions and multiple campus institutions, and representatives of centrally controlled institutions are required to attend. Currently accredited centrally controlled institutions are responsible for providing workshop information to the chief on-site administrators and renewal self-study coordinators of all main campuses and branch campuses.

## **OPTIONS**

1. Vote to approve the proposed policy presented below and publish it in the *Accreditation Criteria*, effective January 1, 2017.
2. Vote to approve the proposed policy with amendments shown below and publish it in the *Accreditation Criteria*, effective January 1, 2017:
3. Recommend a different approach to policy issue as stated below:
4. Remove from further consideration.

### **RECOMMENDATION: Option 1**

**MOVED:** Commissioner Edwards moved to accept option 2 as amended

**SECONDED:** Commissioner Ramirez-Rivera moved to second the motion

**AMENDMENT:** Commissioner Edwards proposed the following amendment to option 2:

The Council schedules accreditation workshops each year. Applicants for initial or renewals of accreditation are required to attend a workshop. During these workshops, Council representatives will consult with institutional representatives to help them understand and complete the process. Institutional representatives are required to attend an accreditation workshop within 18 months prior to the final submission of the evaluation visit materials, which are due two weeks prior to an onsite visit. For initial applicants, the chief on-site administrators of main campuses and all branch campuses are required to attend. For currently accredited institutions, the chief on-site administrators or the renewal self-study coordinators for single campus institutions and multiple campus institutions, and representatives of centrally controlled institutions are required to attend. Currently accredited

centrally controlled institutions are responsible for providing workshop information to the chief on-site administrators and renewal self-study coordinators of all main campuses and branch campuses.

6. **COMMITTEE:** EEE/12.16/05

**DATE:** December 5, 2016

**SUBJECT:** Transfer of Credit (TC) & Admission of International Students / Catalog Requirements for Disclosure of TC Policies and Agreements

**STAFF:** Ms. Katie Morrison

## **ISSUE**

- 1) The evaluation and acceptance of transfer of credit must only be from accredited institutions or those recognized as institutions of higher education (international). This is currently not clear in the language and neither is the expectation that foreign transcripts must be evaluated for equivalency prior to accepting said credits. The Criteria also does not identify provisions in place to ensure that the transcripts of international students seeking admission indicate the equivalent of graduation from high school.
- 2) There have been questions as to whether campuses should be required to disclose their transfer of credit policy, articulation agreements, and contracts or agreements in their catalog.

## **OVERVIEW**

- 1) With the increase and sophistication of diploma mills, it is important that the Council communicates its emphasis on academic quality via the expectations of academic coursework being considered for transfer into one of its institutions. Implicitly, the campus should conduct its own assessment of the validity of coursework already completed for alignment with its own program outcomes, and the equivalency of foreign credentials with high school graduation for the admission of international students. However, with additional clarity in the language, all institutions, including those not currently accredited, will be informed of this explicit requirement. This item was moved from the April 2016 to August 2016 meeting agenda.
- 2) Operationally, it is often difficult to determine whether an institution must have an item noted within its catalog when the requirement simply states that these policies or procedures are to be made public. In order to provide clarification, the recommendation is to explicitly state that these particular items must be included in a campus' catalog, and such information listed in Appendix C. The proposed revision of criteria in regards to this item was accepted for consideration in August by the BPC committee at the April meeting, and has been mingled with the proposed criteria revision for item (1), as they both affect Section 3-1-413.

The Council moved to accept the proposed policy at the August 2016 (remote) meeting and publish it in the Memo to the Field.

## CRITERIA

**3-1-411. Admissions.** The admissions policy shall conform to the institution's mission, shall be publicly stated and shall be administered as written. The following minimums apply:

- (a) The requirements for students admitted to programs leading to a certificate, diploma or degree shall include graduation from high school or its equivalent, or demonstration of the student's ability to complete the program under the ability-to-benefit classification as specified under standard 3-1-303(b) and (c), as provided for by governing laws. Foreign transcripts of international students seeking admission must be evaluated by a member of the Association of International Credentials Evaluators (AICE), the American Association of Collegiate Registrars and Admissions Officers (AACRAO), or the National Association of Credential Evaluation Services (NACES) to validate equivalency with graduation from high school and eligibility to enter college or university in the United States.
- (b) It is the responsibility of the institution to maintain student records which reflect the requirements for admission of all students.
- (c) Institutions are not precluded from admitting, under different requirements, students who are beyond the age of compulsory school attendance or who may be otherwise specifically circumstanced, such as:
  - (i) having financial sponsorship through contractual agreements with public or private organizations
  - (ii) having identifiable needs requiring remedial instruction as a supplement to the regular curriculums
  - (iii) participating in innovative postsecondary programs specially described to ACICS; or
  - (iv) being enrolled in individual courses not leading to an academic credential.

**3-1-413. Transfer of Credit.** An institution shall evaluate and consider awarding proper academic credit for credits earned only at institutions that are either accredited by agencies recognized by the United States Department of Education, or recognized by the respective government as institutions of higher education, for internationally-based institutions. The institution shall establish and adhere to a systematic method for evaluating and awarding academic credit for those courses that satisfy current program course requirements, including an evaluation of all foreign transcripts by a member of the Association of International Credentials Evaluators (AICE), the American Association of Collegiate Registrars and Admissions Officers (AACRAO), or the National Association of Credential Evaluation Services (NACES), prior to the evaluation and award. Written policies and procedures must clearly outline the process by which transfer of academic credit is awarded. The institution shall make public disclose in its catalog its policies on transfer of credit, including a statement of the criteria established by the institution by which a determination is made with regard to accepting credits from another institution and if applicable, a list of institutions with which the institution has established articulation agreements.

In addition, the institution must provide notification to students as to disclose in its catalog these articulation agreements and the transferability of the credits in the programs that are offered.

### Appendix C:

Add the following items under “At a minimum, the catalog must contain the following items”:

- A statement of the criteria established by the institution by which a determination is made with regard to accepting credits from another institution and, if applicable, a list of institutions with which the institution has establish articulation agreements (See Section 3-1-413).
- A statement on the transferability of the credits in the programs that are offered (See Section 3-1-413).
- A description of the contracts or agreements and the services to be provided, if the institution has entered into an agreement with an accredited institution, an agreement with an unaccredited institution, or an international partnership agreement (See Sections 2-2-504, 2-2-505, and 2-2-507 for additional information).

### OPTIONS

1. Vote to approve the proposed policy presented above and publish it in the *Accreditation Criteria*, effective January 1, 2017.
2. Vote to approve the proposed policy with amendments shown below and publish it in the *Accreditation Criteria*, effective January 1, 2017:
3. Recommend a different approach to policy issue as stated below:
4. Remove from further consideration.

**RECOMMENDATION:** Option 1

**MOVED:** Commissioner Hobdy moved to accept option 2 as amended

**SECONDED:** Commissioner Thomas moved to second the motion

**AMENDMENT:** Commissioner Hobdy proposed the following amendments to option 2:

**3-1-413. *Transfer of Credit.*** An institution shall evaluate and consider awarding proper academic credit for credits earned only at institutions that are either accredited by agencies recognized by the United States Department of Education, or recognized by the respective government as institutions of higher education, for internationally-based institutions. The institution shall establish and adhere to a systematic method for evaluating and awarding academic credit for those courses that satisfy current program course requirements, including an evaluation of all foreign transcripts by a member of the Association of International Credentials Evaluators (AICE), the American Association of Collegiate Registrars and Admissions Officers (AACRAO), or the National Association of Credential Evaluation Services (NACES), prior to the evaluation and award. Written policies and procedures must clearly outline the process by which transfer of academic credit is awarded. The institution shall disclose in its catalog its policies on transfer of credit, including a statement of the criteria established by the institution by which a determination is made with regard to accepting credits from another institution and if applicable, a list of institutions with which the institution has established articulation agreements.

In addition, the institution must shall disclose in its catalog the transferability of the credits in the programs that are offered.

### Appendix C:

Add the following items under “At a minimum, the catalog must shall contain the following items”:

- A statement of the criteria established by the institution by which a determination is made with regard to accepting credits from another institution and, if applicable, a list of institutions with which the institution has established articulation agreements (See Section 3-1-413).
- A statement on the transferability of the credits in the programs that are offered (See Section 3-1-413).
- A description of the contracts or agreements and the services to be provided, if the institution has entered into an agreement with an accredited institution, an agreement with an unaccredited institution, or an international partnership agreement (See Sections 2-2-504, 2-2-505, 2-2-506, and 2-2-507 for additional information).

7. **COMMITTEE:** EEE/12.16/6

**DATE:** December 5, 2016

**SUBJECT:** Glossary Definition of Externship

**STAFF:** Ms. Katie Morrison

### ISSUE

There is a need to clarify the expectation of the supervision of faculty of the externship course and not the development of the agreement

### OVERVIEW

In an attempt to clarify its intent that the externship course be supervised by a faculty member (and not staff), the Council inadvertently made a change that reads as though the faculty should supervise the agreement and not the experience. This item was moved from the April 2016 to August 2016 meeting agenda. The Council moved to accept the proposed policy at the August 2016 (remote) meeting and publish it in the Memo to the Field.

### CRITERIA

**Externship.** A supervised practical experience, under the supervision of a faculty member, that is the application of previously studied theory. Under the supervision of a faculty member, a A written agreement shall be developed that outlines the arrangement between the institution and the externship site, including specific learning objectives, course requirements, and evaluation criteria.

### OPTIONS

1. Vote to approve the proposed policy presented above and publish it in the *Accreditation Criteria*, effective January 1, 2017.
2. Vote to approve the proposed policy with amendments shown below and publish it in the *Accreditation Criteria*, effective January 1, 2017:
3. Recommend a different approach to policy issue as stated below:
4. Remove from further consideration.

**RECOMMENDATION:** Option 1

**MOVED:** Commissioner Edwards moved to accept option 2 as amended

**SECONDED:** Commissioner Ramirez-Rivera moved to second the motion

**AMENDMENT:** Commissioner Edwards proposed the following amendment to option 2:

**Externship.** A practical experience, under the supervision of a qualified faculty member, that is the application of previously studied theory. A written agreement shall be developed that outlines the arrangement between the institution and the externship site, including specific learning objectives, course requirements, and evaluation criteria.

8. **COMMITTEE:** EEE/12.16/7
- DATE:** December 5, 2016
- SUBJECT:** Mission Statement
- STAFF:** Ms. Katie Morrison

**ISSUE**

Institutional missions have been presented for review and approval with objectives as part of the mission statement versus separating out the objectives or specifically stating the objectives.

**OVERVIEW**

This item was moved to the EEE committee agenda (from IEC) after the April 2016 meeting. The Council reviewed the current criteria at the April meeting to determine if revision would be required to satisfy its intent for the structure and function of a mission statement and objectives, and voted to accept the following revised language. The Council moved to accept the proposed policy at the August 2016 (remote) meeting and publish it in the Memo to the Field.

**CRITERIA**

### **3-1-100 – Mission: Purpose and Objectives**

Every institution must have a mission which is its specific purpose for existing. The mission must include a mission statement and a set of objectives which together accomplish the purpose of the institution. This mission, together with a set of objectives to accomplish it, must be summarized in a mission statement. The objectives should be devoted substantially to career-related education and should be reasonable for the program of instruction, mode of delivery, and facilities of the institution.

Institutions may exhibit a variety of missions, ranging from those which have a singleness of purpose to those which are multi-purpose.

### **OPTIONS**

1. Vote to approve the proposed policy presented above and publish it in the *Accreditation Criteria*, effective January 1, 2017.
2. Vote to approve the proposed policy with amendments shown below and publish it in the *Accreditation Criteria*, effective January 1, 2017:
3. Recommend a different approach to policy issue as stated below:
4. Remove from further consideration.

**RECOMMENDATION:** Option 1

**MOVED:** Commissioner Thomas moved to accept option 1 as proposed

**SECONDED:** Commissioner Ramirez-Rivera moved to second the motion

### **III. ADJOURNMENT**

Commissioner Blake motioned for adjournment which was seconded by Commissioner Edwards. The Committee session adjourned at 4:25 PM.

**FINANCIAL REVIEW COMMITTEE MINUTES**

**Monday, December 5, 2016**

**9:00 AM – 12:00 PM**

Committee Members

Mr. John Euliano, Chair

Mr. Richard Bennett

Ms. Julie Blake

Dr. Fardad Fateri

Dr. Lawrence Leak

Mr. Roger Swartzwelder

Observer:

Ms. Judee Timm

Staff Liaisons

Ms. Julie Euliano – Primary Liaison

Mr. Quentin Dean – Secondary Liaison

Additional Staff:

Mr. Roger J. Williams

Mr. Steven Gelfound

Ms. Perliter Walters-Gilliam

Ms. Kay Ropko

Ms. Linda Lundberg

**CALL TO ORDER**

Chair Euliano called the meeting to order at 9:00 A.M. Monday, December 5, 2016.

**OLD BUSINESS**

**A. Consent Agenda for Institutions Previously on QFR**

1. (11238) American National University, Lexington, KY - 1 point
2. (10278) American National University, Salem, VA - 0 points
3. (10683) National College, Nashville, TN - 0 points
4. (20271) Court Reporting Institute of St. Louis, Clayton, MO - 1 point

Vote on item 4 above separately:

MOTION: Continue QFR  
MOVED: Euliano  
SECONDED: Bennett  
ACTION: Approved  
ABSTAINED: Fateri

5. (10469) Duluth Business University, Duluth, MN - 1 point
6. (10190) EDIC College, Caguas, PR - 1 point
7. (10602) Empire College, Santa Rosa, CA - 1 point
8. (44818) Felbry College School of Nursing, Columbus, OH - 0 points
9. (11150) Florida Career College, Miami, FL - 1 point
10. (10845) Key College, Dania Beach, FL - 2 points
11. (10950) Lincoln Technical Institute, Edison, NJ - 2 points
12. (10399) Metro Business College, Cape Girardeau, MO - 1 point
13. (11303) Minnesota School of Business, Richfield, MN - 0 points
14. (10292) Stone Academy, West Haven, CT - 0 points

MOTION: Items 1-3 and 5-14 above, continue on QFR  
MOVED: Bennett  
SECONDED: Leak  
ACTION: Approved  
ABSTAINED: Fateri, Item 9 above: Florida Career College

**B. Consent Agenda for Institutions Previously on FIP**

1. (11105) National Latino Education Institute, Chicago, IL - 1 point
2. (11332) Ridley-Lowell Business & Technical Institute, Binghamton, NY - 3 points
3. (11303) Ridley-Lowell Business & Technical Institute, New London, CT - 1 point
4. (10657) Southern Technical College, Fort Myers, FL - 1 point
5. (20720) Southern Technical College, Orlando, FL - 1 points
6. (11096) Taylor Business Institute, Chicago, IL - 1 point

MOTION: Continue on FIP  
MOVED: Swartzwelder  
SECONDED: Leak  
ACTION: Approved  
ABSTAINED: Bennett, on items 4 and 5

*The mission of the Financial Review Committee ("FRC") is to monitor the financial stability of accredited institutions in order to ensure they maintain sufficient financial resources to deliver a quality education to their students.*

C. Institutions Directed to Continue on FIP

1. (20292) California Intl Business University, San Diego, CA – 5 points

MOTION: Continue FIP  
MOVED: Fateri  
SECONDED: Leak  
ACTION: Approved

2. (28864) Tribeca Flashpoint Media Arts Academy, Chicago, IL – 7 points

MOTION: Continue FIP  
MOVED: Fateri  
SECONDED: Blake  
ACTION: Approved

D. Institutions Subject to Change in Review Status – Previously QFR

1. (10740) Cambria-Rowe Business College, Johnstown, PA – CLOSED

MOTION: Remove from QFR  
MOVED: Blake  
SECONDED: Leak  
ACTION: Approved

2. (10418) Coleman University, San Diego, CA – 6 points

MOTION: Continue on QFR  
MOVED: Euliano  
SECONDED: Blake  
ACTION: Approved  
ABSTAINED: Swartzwelder

3. (10306) Daymar College, Owensboro, KY – 10 points

MOTION: Continue QFR  
MOVED: Blake  
SECONDED: Fateri  
ACTION: Approved

4. (73849) EMSTA College, Santee, CA – NO SUBMISSION

MOTION: Remove from QFR  
MOVED: Blake  
SECONDED: Bennett  
ACTION: Approved

5. (10898) Globe University, Woodbury, MN – 7 points

MOTION: Place on FIP  
MOVED: Swartzwelder  
SECONDED: Fateri  
ACTION: Approved

6. (11116) Prince Institute, Southeast, Elmhurst, IL – 7 points

MOTION: Continue QFR  
MOVED: Bennett  
SECONDED: Blake  
ACTION: Approved

7. (28284) SAE Institute of Technology, Los Angeles, CA – 4 points

MOTION: Continue QFR  
MOVED: Leak  
SECONDED: Bennett  
ACTION: Approved

8. (32108) SAE Institute of Technology, N. Miami Beach, FL – 0 points

MOTION: Continue QFR  
MOVED: Leak  
SECONDED: Blake  
ACTION: Approved

9. (245680) SAE Institute of Technology, Nashville, TN – 1 point

MOTION: Continue QFR  
MOVED: Leak  
SECONDED: Blake  
ACTION: Approved

E. Institutions Subject to Change in Review Status – Previously FIP

1. (73857) Bay Area College of Nursing, Palo Alto, CA – CLOSED

MOTION: Remove from FIP  
MOVED: Fateri  
SECONDED: Blake  
ACTION: Approved

2. (19459) Brooks Institute, Ventura, CA – CLOSED

MOTION: Remove from FIP  
MOVED: Blake  
SECONDED: Leak  
ACTION: Approved

3. (12400) Colorado Heights University, Denver, CO – 10 points

MOTION: Continue on FIP  
MOVED: Euliano  
SECONDED: Blake  
ACTION: Approved

4. (22465) Jose Maria Vargas University, Pembroke Pines, FL – 7 points

MOTION: Continue on FIP  
MOVED: Swartzwelder  
SECONDED: Fateri  
ACTION: Approved

5. (16303) MDT College of Health and Science, Highland Heights, OH – 10 points

MOTION: Place on show-cause.  
MOVED: Fateri  
SECONDED: Swartzwelder  
ACTION: Approved

6. (40730) Missouri College, Brentwood, MO – CLOSED

MOTION: Remove from FIP  
MOVED: Leak  
SECONDED: Blake  
ACTION: Approved

7. (11328) New York Institute of English and Business, New York, NY – 8 points

MOTION: Continue on FIP  
MOVED: Euliano  
SECONDED: Fateri  
ACTION: Approved

B. (22447) Pinchot University, Seattle, WA – NO SUBMISSION

MOTION: Place on show-cause  
MOVED: Bennett  
SECONDED: Leak  
ACTION: Approved

9. (15661) Spencerian College, Lexington, KY – 13 points

MOTION: Continue on FIP  
MOVED: Blake

SECONDED: Swartzwelder  
ACTION: Approved

10. (15803) Sullivan College of Technology and Design, Louisville, KY – 4 points

MOTION: Continue on FIP  
MOVED: Blake  
SECONDED: Swartzwelder  
ACTION: Approved

11. (27446) Broadview University-West Jordan, Woodbury, MN – 7 points

MOTION: Continue on FIP  
MOVED: Fateri  
SECONDED: Euliano  
ACTION: Approved

12. (70534) Pittsburgh Career Institute, Pittsburgh, PA – 13 points

MOTION: Continue on FIP  
MOVED: Euliano  
SECONDED: Fateri  
ACTION: Approved

Career Education Corporation

1. +(48705) Le Cordon Bleu College of Culinary Arts, Scottsdale, AZ – 4 points
2. +(19019) Le Cordon Bleu College of Culinary Arts, Pasadena, CA – 7 points
3. +(48280) Le Cordon Bleu College of Culinary Arts, San Francisco, CA – 7 points
4. +(38375) Le Cordon Bleu College of Culinary Arts, Portland, OR – 1 point
5. +(21352) Le Cordon Bleu College of Culinary Arts, Austin, TX – 4 points
6. +(10798) SBI Campus-An Affiliate of Sanford-Brown, Melville, NY – CLOSED
7. +(15768) Sanford-Brown Institute, Jacksonville, FL – CLOSED
8. +(11161) Sanford-Brown College, Tampa, FL – 13 points
9. +(20950) Sanford-Brown College, Atlanta, GA – 13 points
10. +(20968) Sanford-Brown College, Dallas, TX – 13 points
11. +(11132) Sanford-Brown College-Chicago, Chicago, IL – 10 points
12. +(70523) Sanford-Brown College, Mendota Heights, MN – 13 points

MOTION: Continue on QFR, and remove schools 6 and 7  
MOVED: Euliano

SECONDED: Bennett  
ACTION: Approved

Delta Career Education Corporation

1. (11194) McCann School of Business and Technology, Pottsville, PA - 4 points
2. (12392) Tucson College, Tucson, AZ - 8 points
3. (114473) Berks Technical Institute, Wyomissing, PA - 0 point
4. (10911) Miller-Motte Technical College, Clarksville, TN - 0 points
5. (10317) Miller-Motte Technical College, Lynchburg, VA - 0 points

MOTION: Continue on FIP  
MOVED: Euliano  
SECONDED: Blake  
ACTION: Approved  
ABSTAINED: Swartzwelder

Fortis Institute

1. (10934) Fortis Institute, Erie, PA - 1 points
2. (16005) Fortis College, Orange Park, FL - 1 point
3. (10770) Fortis College, Norfolk, VA - 10 points

MOTION: Continue on FIP  
MOVED: Euliano  
SECONDED: Fateri  
ACTION: Approved

F. Institutions on Financial Show Cause

1. (15728) Bristol University, Anaheim, CA - 16 points

MOTION: The hearing panel recommends continuing the show-cause.  
MOVED: Fateri  
SECONDED: Edwards  
ACTION: Approved

2. (21231) Medtech College, Indianapolis, IN – NO SUBMISSION  
School closed. At the time of closure the institution was on show-cause.

MOTION: Remove from Show-Cause  
MOVED: Euliano  
SECONDED: Blake  
ACTION: Approved

3. (33239) Radians College, Washington, DC – NO SUBMISSION  
School closed. At the time of closure the institution was on show-cause.

MOTION: Remove from Show-Cause  
MOVED: Bennett  
SECONDED: Leak  
ACTION: Approved

Education Management Corporation (Financial Show-Cause directed in 04/16)

1. +(32159) The Art Institute of York – Pennsylvania, York, PA – 3 points
2. (16231) The Art Institute of Fort Lauderdale, Fort Lauderdale, FL – 6 points
3. (10751) The Art Institutes International Minnesota, Minneapolis, MN – 13 points
4. (16235) Art Institute of New York City, New York, NY – 8 points
5. (16228) Art Institute of Phoenix, Phoenix, AZ – 4 points

MOTION: The hearing panel recommends continuing show-cause  
MOVED: Swartzwelder  
SECONDED: Bennett  
ACTION: Approved

Zenith Education Group, Inc. (Financial Show-Cause directed in 04/16)

1. (10219) Everest College, Colorado Springs, CO – 4 points
2. (10748) Everest College, Springfield, MO – 10 points
3. (11101) Everest College, Thornton, CO – 13 points
4. (11314) Everest College, Newport News, VA – 8 points
5. (147010) Everest College, Woodbridge, WA – 7 points
6. (11333) Everest College, Henderson, NV – 14 points
7. +(10678) Everest College, Portland, OR – 7 points
8. +(10564) Everest College, Bremerton, WA – 7 points
9. (10679) Everest University, Orlando, FL – 3 points

MOTION: The hearing panel recommends vacating the financial show-cause directive and probation order and placing the institution on quarterly financial reporting.  
MOVED: Edwards  
SECONDED: Jones  
ACTION: Approved

G. Policy Discussion Items

1. Submission of the Title IV compliance audit

MOTION: Adopt Option 1: Accept the proposed Policy requesting schools to submit Title IV Compliance Audits; and publish as final to the Memo to the Field and the Accreditation Criteria, effective January 1, 2017  
MOVED: Swartzwelder  
SECONDED: Bennett  
ACTION: Approved

**II. NEW BUSINESS**

- A. Consent Agenda for Institutions Directed to Submit Quarterly Financial Reports

1. (32315) American International College of Arts and Sciences, St. John's, Antigua, West Indies – 1 point

MOTION: No Action  
MOVED: Swartzwelder  
SECONDED: Blake  
ACTION: Approved

B. Institutions Subject to Review due to triggers on AFR and/or Audited Financial Statements

1. (24852) Peloton College, Dallas, TX – 3 points

MOTION: Place on QFR  
MOVED: Euliano  
SECONDED: Fateri  
ACTION: Approved

2. (241563) Victory Trade School, Springfield, MO – 7 points

MOTION: Place on QFR  
MOVED: Bennett  
SECONDED: Blake  
ACTION: Approved

C. Change of Ownership/Control - NONE

D. Financial Adverse Information

1. (903200) Empire College – Letter of Credit
2. No AFR Submission, due 06/30/16:
  - a. (61155) Universidad San Ignacio Loyola, Lima, Peru
  - b. (233044) Universidad San Ignacio De Loyola S.A. , Lima, Peru

The institution uploaded the audited financial statement but didn't submit an AFR. The school hasn't paid their sustaining fees. Send a letter to the institution, stating the school's accreditation will be revoked if the Council does not receive their AFR and sustaining fee by a certain date.

3. See attached FRC Adverse Report – NONE

E. Policy Discussion Items

1. New QFR form

Julie Euliano will test ACICS new financial IT platform. In the interim, Excel QFR and FIP forms were approved for the web site.

#### **IV. ADJOURNMENT**

Chair Euliano adjourned the meeting at 12:15 p.m., Monday, December 5, 2016.

**INSTITUTIONAL EFFECTIVENESS COMMITTEE  
AGENDA  
Tuesday, December 6, 2016  
1:00 PM-5:00 PM**

Committee Members

Ms. Michelle Edwards, Chair  
Dr. Adriene Hobdy  
Dr. Deborah Jones  
Mr. Luis Llerena  
Dr. Rafael Ramirez-Rivera  
Dr. Ruth Shafer  
Ms. Martha Loveman

Staff Liaisons

Ms. Karly Zeigler – Primary Liaison  
Ms. Niana Moore– Secondary Liaison  
Mr. Steven Gelfound - Vice President Liaison

Attendees

Ms. Julie Blake  
Dr. Fardad Fateri  
Mr. Jay Fund  
Dr. Judee Timm  
Dr. Edward G. Thomas  
Ms. Anne Bennett  
Ms. LaToya Boyd  
Mr. Quentin Dean  
Dr. Terron King  
Mr. Ian Harazduk  
Ms. Linda Lundberg  
Ms. Katie Morrison  
Mr. Maurice Wadlington  
Ms. Perliter Walters – Gilliam  
Mr. Roger Williams

## **I. CALL TO ORDER**

Chair Edwards called the meeting to order at 2:08 p.m. on December 6, 2015.

## **II. OLD BUSINESS**

### **1. Campus Effectiveness Plan IEC/12.16/1**

#### **ISSUE:**

The current criteria regarding the CEP include policies and procedures, as well as examples, create confusion in the field concerning the expectations and interpretation of the language, and lack much needed guidance to emphasize the value of the CEP for members' daily operations and evaluation of their own effectiveness.

#### **OVERVIEW:**

Over the past few years, extensive research was conducted and discussion had which led to several rounds of changes to clarify the composition and elements of the CEP, the first of which being the revision of the definition of *Student Learning Outcomes* in the Glossary. The second round of changes went into effect on July 1, 2016, adding the *level of student satisfaction* as a required element of the CEP; deleting *graduation rate* as a required element but keeping it, in addition to *cohort default rates* and *matrices of financial stability*, as a recommended area for evaluation; and revising all language to remove references to centrally controlled institutions, institutional effectiveness and Institutional Effectiveness Plans (IEP), in order to place the focus on campus-level effectiveness. At the April 2016 meeting, the Council voted to consider for proposed policy change the addition of a supplementary Appendix K on the Requirements and Guidelines for the CEP, and simplification of criteria for the CEP in order to

outline the ACICS policy and refer to Appendix K for more explicit guidelines. After the April meeting, the staff has added additional verbiage under Student Learning Outcomes (SLOs) in Appendix K to indicate that licensure and certification pass rates, if applicable, are a required student learning outcome.

The Council, at the August 2016 meeting, moved to accept the proposed policy with amendments and publish it in the Memo to the Field. The amendments included the addition of graduation rates and cohort default rates (if applicable) as required CEP elements, and expansion on those elements to be added to the new Appendix K.

**CRITERIA: 3-1-110 – Institutional Effectiveness**

**3-1-111. Campus and Institutional Effectiveness Plans.**

**3-1-112. Implementation and Monitoring of Campus and Institutional Effectiveness Plans.**

**3-1-113. Evaluation of Campus and Institutional Effectiveness Plans.**

**Appendix K**

**OPTION 1:** Vote to approve the proposed policy presented below and publish it in the *Accreditation Criteria*, effective January 1, 2017.

**OPTION 2:** Vote to approve the proposed policy with amendments shown below and publish it in the *Accreditation Criteria*, effective January 1, 2017:

**ATTACHMENT A: PROPOSED REVISION TO CEP CRITERIA (with amendment)**

**3-1-110 – CAMPUS EFFECTIVENESS**

An important indication of the overall effectiveness of an ACICS-accredited campus is the degree to which it meets the mission, objectives, and educational goals it has identified. Each ACICS-accredited main and branch campus shall develop and implement a written Campus Effectiveness Plan (CEP) that is consistent with its mission and objectives. The CEP shall identify how a campus plans to assess and continuously improve its overall educational operations and how it plans to meet the educational and occupational objectives of its programs, taking into consideration its review of all critical organizational functions such as admissions, recruitment, financial aid, and student services.

For the Campus Effectiveness Plan, the following elements, at a minimum, shall be evaluated and reported for achievement of outcomes, at both the campus and program levels:

1. retention rate,
2. placement rate,
3. graduate rates,
4. the level of student satisfaction,

5. the level of graduate satisfaction,
6. the level of employer satisfaction,
7. student learning outcomes, and
8. cohort default rates, if applicable.

**3-1-111. *Development of the Campus Effectiveness Plan.*** The effectiveness plan for each campus shall be described in a written CEP document that complies with Appendix K, “Requirements and Guidelines for the Campus Effectiveness Plan (CEP).”

**3-1-112. *Implementation and Monitoring of the Campus Effectiveness Plan.*** Each campus shall establish a process for developing, reviewing, and monitoring the Campus Effectiveness Plan (CEP). Each campus shall document that progress reports, completed at least biannually, related to completion of activities and changes in data and information for each of the elements identified in the CEP are prepared.

**3-1-113. *Evaluation of the Campus Effectiveness Plan.*** Each campus shall evaluate the CEP, its goals, and the effectiveness of activities completed at least annually. The annual evaluation will involve comparison of outcomes with baseline rates and goals for each of the elements measured after completion of planned activities. Data for historical outcomes shall be maintained and included in the report to provide a basis for evaluating the achievement of goals for the various elements of operations and campus and program effectiveness over time.

## **APPENDIX K Requirements and Guidelines for the Campus Effectiveness Plan (CEP)**

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This Appendix identifies the Council’s requirements for the content of a written Campus Effectiveness Plan (CEP) document. The CEP should provide information about the campus and how it measures and evaluates key elements of its operations in order to continuously improve its overall educational operations and meets its mission and objectives. The Council requires each campus to have a current CEP available that meets the requirements identified in this Appendix.

A main and branch campus may use similar language, format, and general content in CEPs, where appropriate. However, the CEP for each main and branch campus must also include information and data specific to its own campus including the characteristics and demographics of the current student population; the number of students enrolled in each program; campus and program retention and placement rates; results of surveys to determine current student, graduate, and employer satisfaction; student learning outcomes; and any additional elements used to evaluate effectiveness, such as graduation rates, cohort default rates, and matrices of financial stability.

For those campuses offering programs in non-traditional modes of delivery, the distance education plan must be integrated into the CEP and the elements evaluated to include the effect of the modality on overall outcomes. Further, the campus must also incorporate its assessment of faculty satisfaction into its plan.

### **A. Evaluation of Elements in the Campus Effectiveness Plan (CEP)**

The CEP shall, at minimum and at both the campus and program levels, report outcomes for each of the elements listed below. For each element, at the campus and program levels, as appropriate, baseline rates

and levels for comparison and goals for the current evaluation period must be identified. A summary and analysis of previous performance, a rationale for the baseline rates and levels, goals, and a listing of activities that will be undertaken to achieve the goals must also be included.

1. Retention rates.
2. Placement rates.

Student retention and graduate placement rates reported on the Campus Accountability Report (CAR) shall be included in the CEP for the most recent three years, or, if less than three years' worth of CAR data is available, data for at least one reporting period. The data and information reported for retention and placement rates must demonstrate that the campus is maintaining or improving performance each year or, if that is not the case, then the campus must provide an explanation of mitigating circumstances affecting improved outcomes. In accordance with Section 2-1-809, a specific plan to improve the retention and/or placement rate(s) for each program not meeting current Council standards for retention and/or placement must be included within the CEP.

3. Graduation Rates

Graduation rates are based on scheduled to graduate cohort for each program offered at a campus. The graduation rates reported on the Campus Accountability Report (CAR) shall be included in the CEP for the most recent three years, or, if less than three years' worth of CAR data is available, data for at least one reporting period.

4. The level of current student satisfaction.
5. The level of graduate satisfaction.
6. The level of employer satisfaction.

The level of satisfaction for each of the three elements identified above shall be determined and reported at least twice a year. For each of these three elements, the CEP must identify and describe what types of data were used to determine the level of satisfaction, how they were collected, and the target group's response rate. Graduate satisfaction should be evaluated no sooner than 30 days following and within 6 months after graduation and include both placed and non-placed graduates.

7. Student learning outcomes (SLOs).

Measuring and evaluating achievement of the SLOs are among the most important activities available to validate and confirm overall program and campus effectiveness. SLOs should be appropriately selected to reflect the nature of the academic programs offered and must include direct assessments but may also include indirect measurements (see Glossary definitions of **Direct** and **Indirect Assessment**). For campuses that offer programs for which licensure or certification is required to practice in the specific career field, pass rates shall be evaluated as a required student learning outcome.

8. Cohort Default Rates

~~For those campuses that participate in the Title IV program, the campus must review its cohort default rates. The cohort default rates received from the Department of Education shall be included in the CEP for the most recent three years' worth of data, or, if less than three years' worth of data is available, data for at least one reporting period. Any campus that is required to~~

~~submit an improvement plan in accordance with Section 2-1-810 must include the plan within the CEP.~~

**B. Implementation and Monitoring of the Campus Effectiveness Plan (CEP)**

Each campus shall systematically maintain progress reports on a periodic basis as defined by the campus but no less than two times during the CEP year that document completion of activities and changes in data and information for each of the CEP elements. Activities, as described in the reports, are to be specific and measurable.

In addition to the periodic progress reports, each campus is required to conduct a comprehensive evaluation of its plan at the end of the CEP year and to incorporate the results of that evaluation into the next year's CEP, as appropriate. The next year's CEP should contain a narrative section describing or explaining the consideration and, if applicable, the incorporation of the previous year's outcomes in the formulation of the new document.

**MOTION:** Vote to approve the proposed policy with amendments shown (strike – through) and publish it in the Accreditation Criteria, effective January 1, 2017:

**MOVED:** Hobdy  
**SECONDED:** Jones  
**ACTION:** Passed

**III. NEW BUSINESS**

1. Enrollment Growth Monitoring

**SUBJECT:** Enrollment growth monitoring for Empire College, Santa Rosa, CA, Silicon Valley University, San Jose, CA and California University of Management and Sciences, Arlington, VA

**STAFF:** Dr. Terron King

**OVERVIEW:**

In 2007, the Council discussed the issue of rapid enrollment growth and the risk that such growth might pose for a campus and for the Council, should it be so rapid and so unforeseen as to outpace the ability of the campus to finance and deploy the academic support and student services necessary to maintain the quality of educational programs. The problems at Decker College and their impact upon the students and the institution's accreditor were described as an example of the potential for this kind of breakdown in the effectiveness of the accreditation process. It was decided at its December 2007 meeting that enrollment growth would be monitored through the Campus Accountability Report (CAR), formerly known as Annual Institutional Report (AIR).

**The Effectiveness of the CAR for monitoring growth** – The CAR can be used to calculate growth in total enrollment across one and two year periods. The definition of total enrollment in the CAR is clear and useful for this purpose. However, there are limitations to the CAR as a means for monitoring growth. Rapid growth that exceeds 100% within a timeframe of less than one year cannot be effectively monitored by using the CAR. Even growth measured at the end of a traditional academic year, say at the end of the spring semester or the end of the third quarter, will not be captured by the CAR until June 30<sup>th</sup>, and will not be reported to ACICS until the following fall (November 1<sup>st</sup>).

**Report on ACICS-accredited institutions that doubled their growth over one year -**

Based upon a comparison of the total enrollment figures from the 2015 and 2016 CARs, three campuses passed the threshold of more than 400 students between 2015 and 2016 having enrollment growth rates ranging from 133 % to 180%. See the attached table of Campus Annual Percentage Growth for details.

**OPTION 1:** Vote to approve placing Empire College, Santa Rosa, CA, Silicon Valley University, San Jose, CA and California University of Management and Sciences, Arlington, VA on Enrollment Growth Monitoring.

**OPTION2:** Vote to approve the proposed policy with amendments shown below and publish it in the *Accreditation Criteria*, effective January 1, 2017: Vote to approve staff recommendations placing Empire College, Santa Rosa, CA, Silicon Valley University, San Jose, CA and California University of Management and Sciences, Arlington, VA on Enrollment Growth Monitoring presented above with the following amendments

**MOTION:** Accept option 1 and approve placing Empire College, Santa Rosa, CA, Silicon Valley University, San Jose, CA and California University of Management and Sciences, Arlington, VA on Enrollment Growth Monitoring.

**MOVED:** Jones

**SECONDED:** Hobdy

**ACTION:** Passed

Exhibit A:

## Campuses that experienced $\geq$ 100% of growth from 2015-2016

### Profile for 00010602: Annual Growth of 180%

Empire College, Santa Rosa, CA

School Type	Accreditation Expiration Date	Credential Level	Online Activities	Online Branch	DE Approval	# of Programs of Study	# of New Program Applications	Financial Reporting	Retention	Placement	New Campus	Learning Sites	Complaints & Adverse	Licensure Pass Rates
For-Profit	12/31/2017	2	No	No	No	25	0	Yes	80%	87%	No	No	Yes	Not Applicable

Last PVP Submission Date- 11/30/16

Total Placements Reported- 29 graduates and ACICS has verified -27= 93 %

ACICS has not verified/ no response from 2 graduates (neither these graduates nor their employers have responded to request of their employment status)

### Profile for 00019408: Annual Growth of 133%

Silicon Valley University, San Jose, CA

School Type	Accreditation Expiration Date	Credential Level	Online Activities	Online Branch	DE Approval	# of Programs of Study	# of New Program Applications	Financial Reporting	Retention	Placement	New Campus	Learning Sites	Complaints & Adverse	Licensure Pass Rates
For-Profit	12/31/2017	6	No	No	No	8	0	No	94%	80%	No	No	No	Not Applicable

Last PVP Submission Date- 11/30/16

Total Placement Reported- 247 and ACICS has verified-191/77 %

Total Responses- 202 / 82% (Of the 202 Responses, 11 / 5 % were deemed invalid by ACICS since they were all titled as internships)

### Profile for 00023818: Annual Growth of 169%

California University of Management and Sciences, Arlington, VA

School Type	Accreditation Expiration Date	Credential Level	Online Activities	Online Branch	DE Approval	# of Programs of Study	# of New Program Applications	Financial Reporting	Retention	Placement	New Campus	Learning Sites	Complaints & Adverse	Licensure Pass Rates
For-Profit	13/31/2017	5	No	No	No	6	0	No	64%	50%	No	No	No	Not Applicable

Last PVP Submission Date- 9/20/16

Total Placements Reported- 1

ACICS verified-0% (this placement was deemed invalid by ACICS since the graduate completed an MBA program but was a Customer Assistant at CVS Pharmacy, this placement was by benefit)

ACICS Not Verified/ No response-0

2. Online activities includes students who are enrolled in one or more online course at the institution and/or institutions that offer online courses/programs.

3. Number of New Program Applications refers to the applications received by the office since January 2016

2. 2016 CAR Review and Actions IEC/12.16/4

King

- 2016 Campus and Program-Level Retention, Placement, and Licensure Pass Rate Review
- Egregious errors on 2016 CAR

**SUBJECT:** Campus Accountability Report/ Student Achievement Review

**ISSUE:** A review of campuses and programs that fell below the Council Standard for 2016 Campus Accountability Report in the areas of retention, placement, and licensure, where applicable to determine the status for the campuses and/or programs as well as to determine the Council directed activities required for the campuses and programs.

**CRITERIA:** 2-1-809. *Student Achievement Review.* The Council reviews the Campus Accountability Report (CAR) and Institutional Accountability Report (IAR) to monitor performance in terms of student achievement at both the campus and program levels. Measures will include retention; placement; and licensure pass rates, if applicable. When this review indicates that student achievement is below Council standards, the Council will require the institution to add an Improvement Plan within its Campus Effectiveness Plan (CEP) and/or Institutional Effectiveness Plan (IEP). If the Council determines the institution is out of compliance with the Council's requirement for student achievement, the Council will issue a Compliance Warning and require the institution to demonstrate compliance with the next year's CAR submission. This time frame may be extended at the sole discretion of the Council for good cause, including evidence that there has been significant improvement in the deficient area(s) and the applicable time frame does not

provide sufficient time to demonstrate full compliance, e.g., improvement in retention, placement, or licensure pass rates.

**Overview:** 670 campuses submitted the 2016 Campus Accountability Report. Based on data submitted staff recommendations are as follows:

**CAMPUS LEVEL**

The following actions are being recommended for campuses that have fallen below the Council standard:

**Current Submission**

	<b>Reporting</b>	<b>Compliance Warning</b>	<b>Show-Cause</b>	<b>Adverse Action</b>
<b>Campus Retention</b>	59	8	6	
<b>Campus Placement</b>	91	41	27	
<b>Campus Retention (Less than or equal to 10 removed)</b>	59	8	6	
<b>Campus Placement (Less than or equal to 10 removed)</b>	87	41	24	

**Following Year 1**

	<b>Show-Cause</b>	<b>Adverse Action</b>
<b>Campus Retention</b>	14	4
<b>Campus Placement</b>	5	7
<b>Campus Retention</b>	14	4

(Less than or equal to 10 removed)		
Campus Placement (Less than or equal to 10 removed)	4	8

**Following Year 2**

	Adverse Action
Campus Retention	7
Campus Placement	5
Campus Retention (Less than or equal to 10 removed)	TBD
Campus Placement (Less than or equal to 10 removed)	TBD

**PROGRAM LEVEL**

The following actions are being recommended for programs that have fallen below the Council standard:

**Current Submission**

	Reporting	Compliance Warning	Show-Cause	Adverse Action
<b>Program Retention</b>	542	300	287	
<b>Program</b>	609	350	512	

<b>Placement</b>				
<b>Program Licensure</b>	50	24	76	
<b>Program Retention (Less than or equal to 10 removed)</b>	428	221	145	
<b>Program Placement (Less than or equal to 10 removed)</b>	390	160	192	
<b>Program Licensure (Less than or equal to 10 removed)</b>	36	18	50	

**Following Year 1**

	<b>Show-Cause</b>	<b>Adverse Action</b>
<b>Program Retention</b>	227	202
<b>Program Placement</b>	175	484
<b>Program Licensure</b>	12	30
<b>Program Retention (Less than or equal to 10 removed)</b>	150	90
<b>Program Placement (Less than or equal to 10 removed)</b>	43	130

<b>Program Licensure (Less than or equal to 10 removed)</b>	6	23
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**Following Year 2**

	<b>Adverse Action</b>	
<b>Program Retention</b>	81	
<b>Program Placement</b>	115	
<b>Program Licensure</b>	TBD	
<b>Program Retention (Less than or equal to 10 removed)</b>	TBD	
<b>Program Placement (Less than or equal to 10 removed)</b>	TBD	
<b>Program Licensure (Less than or equal to 10 removed)</b>	TBD	

**Option 1:** Vote to approve staff recommendations for student achievement Council actions for campuses and programs presented above.

**Option 2:** Vote to approve staff recommendations for student achievement Council actions for campuses and programs presented above with the following amendments:

**MOTION:** To accept option 2 with amendment and place all 11 campuses below Council standard for retention for the second year in a row on Show Cause.

**Amendment:** Issue letter to campuses already on show-cause and/ or teach-out, acknowledging their current status and notifying them of failure to meet benchmark standards for placement and retention.

**MOVED:** Hobdy  
**SECONDED:** Jones  
**ABSTAINED:** Hobdy  
**ACTION:** passed

**MOTION:** To accept option 2 and place all 11 campuses below Council standard for placement for the second year in a row on Show Cause.

**Amendment:** Issue letter to campuses already on show-cause and/or teach-out, acknowledging their current status and notifying them of failure to meet benchmark standards for placement and retention.

**MOVED:** Hobdy  
**SECONDED:** Jones  
**ABSTAINED:** Llerena  
**ACTION:** Passed

**MOTION:** To accept option 1 and issue withdrawal by suspension for one campus: Gallipolis Career College, Gallipolis, OH for below Council standard for retention following year one.

**MOVED:** Shafer  
**SECONDED:** Jones  
**ACTION:** Passed

**MOTION:** To accept option 1 and issue withdrawal by suspension, effective at the end of directed teach out, for Branford Hall Career Institute, Branford, CT ; Court Reporting Institute of St. Louis, Clayton, MO ( both below placement standards following year 2) and Salter School, Fall River, MA (below placement standards following year one).

**MOVED:** Hobdy  
**SECONDED:** Jones  
**ACTION:** passed

**MOTION:** Accept option 1 and issue program termination letters to all schools with programs not meeting retention, placement, and/or licensure benchmarks for three consecutive years.

Due to the high volume of schools with programs not meeting retention, placement, and/or licensure benchmarks for less than three consecutive years, action is deferred to later meeting until data can be further analyzed for individual programs.

**MOVED:** Shafer

**SECONDED:** Hobdy  
**ACTION:** Passed

- **Discussion:** Several campuses have flagrant errors on 2016 CAR.
  - The following campuses have reported data in the 2016 CAR with obvious error:

<b>INSTITUTION_ID</b>	<b>Institution Name</b>	<b>CITY</b>	<b>STATE</b>	<b>Retention_2016</b>	<b>Placement_2016</b>
00011331	Professional Business College	New York	NY	385%	0%
00024422	SOLEX College	Wheeling	IL	76%	-3%
00170150	Shepherd University	Los Angeles	CA	311%	59%
00179004	Miami Regional University	Miami Springs	FL	250%	0%
00225702	Guglielmo Marconi University	Rome	Rome	94%	1%

**MOTION:** Send letter issuing compliance warning and CAR revision fee to campuses in table above, addressing obvious errors submitted on the 2016 CAR for either placement or retention, with impending withdrawal by suspension and/or unannounced visit based on non-compliance of 3-1-203 and 3-1-303 (a) if no response is received within 10 days following receipt of letter.

**MOVED:** Jones  
**SECONDED:** Shafer  
**ACTION:** passed

- **Discussion-** Camelot College PVP appeal
  - A formal appeal to the Council was presented from Camelot College in LA to overturn the decision of the staff to deny PVP placement of Medical assisting graduates in CNA and phlebotomy related positions.
  - **Motion:** Uphold the decision of staff and request all back-up data for the 2016 CAR. The campus must also change its program placement objectives in its advertising to avoid misleading the public to believe that such placements are appropriate.
    - **MOVED:** Llerena
    - **SECONDED:** Hobdy
    - **ACTION:** Passed
  
- **Discussion -** Proposal to begin Quarterly CAR Reporting
  - Staff Gelfound lead the discussion on initiating a quarterly reported CAR in place of a yearly CAR. Having quarterly reports would hopefully take away some the burden on staff to deal with a heavy load of submission revisions at one time as well as help to track graduation and placement by scheduled to graduate cohorts. Alternative starting dates, starting points, and sample sized were discussed by the committee. A bi –annual CAR submission was settled on.

Chair Edwards adjourned the meeting at 6:53 p.m. on Tuesday, December 6, 2016.

Chair Edwards reconvened the meeting at 12:15 p.m. on Wednesday, December 7, 2016

- Discussion - A proposal for a semi-annual CAR was deliberated.
  - Motion: Make recommend to Full Council to implement a bi-annual CAR for all schools starting with the data due date of January 31, 2017, with no punitive actions taken based on this data. However the data collected can be used on upcoming visits.
  - **MOVED:** Hobdy
  - **SECONDED:** Shafer
  - **ACTION:** Passed

**IV. FUTURE AGENDA**

Review of Schedule-to-graduate rate King

- Moved for discussion in future Meeting

Review of licensure exam pass rates below standard action King

- Moved for discussion in future Meeting

**HEARING REPORT**

ACICS ID	Class	Campus Name	Recommendation	Council Action	Motion	Second	Opposed	Abstain
00016231	MAIN	Art Institute of Fort Lauderdale, Fort Lauderdale, FL	Show Cause	Show Cause				
00016235	MAIN	Art Institute of New York City, New York, NY	Show Cause	Show Cause				
00016228	MAIN	Art Institute of Phoenix, Phoenix, AZ	Show Cause	Show Cause				
00015728	MAIN	Bristol University, Anaheim, CA	Show Cause	Show Cause				
00010091	MAIN	Dewey University, Hato Rey, PR	Vacate Show Cause	Vacate Show Cause	Jones	Shafer		Ramirez
00016100	MAIN	Everest College, Chesapeake, VA	Vacate Show Cause	Vacate Show Cause	Blake	Edwards		
00010219	MAIN	Everest College, Colorado Springs, CO	Vacate Show Cause	Vacate Show Cause	Blake	Edwards		
00010417	MAIN	Everest College, Everett, WA	Vacate Show Cause	Vacate Show Cause	Blake	Edwards		
00011333	MAIN	Everest College, Henderson, NV	Vacate Show Cause	Vacate Show Cause	Blake	Edwards		

00010678	MAIN	Everest College, Portland, OR	Vacate Show Cause	Vacate Show Cause	Blake	Edwards		
00010748	MAIN	Everest College, Springfield, MO	Vacate Show Cause	Vacate Show Cause	Blake	Edwards		
00011101	MAIN	Everest College, Thornton, CO	Vacate Show Cause	Vacate Show Cause	Blake	Edwards		
00147010	MAIN	Everest College, Woodbridge, VA	Vacate Show Cause	Vacate Show Cause	Blake	Edwards		
00011334	MAIN	Everest University - Tampa, Tampa, FL	Vacate Show Cause	Vacate Show Cause	Blake	Edwards		
00010898	MAIN	Globe University, Woodbury, MN	Show Cause	Show Cause	Ramirez-Rivera	Bennett		
00039183	MAIN	Herguan University, Sunnyvale, CA	Show Cause	Show Cause				
00011103	MAIN	Minnesota School of Business, Richfield, MN	Show Cause	Show Cause	Ramirez-Rivera	Bennett		
00054467	MAIN	MJS School of Nursing, Merrillville, IN	Show Cause	Show Cause	Thomas	Ramirez-Rivera		
00032159	MAIN	The Art Institute of York-Pennsylvania, York, PA	Show Cause	Show Cause				
00010751	MAIN	Ther Art Institutes International Minnesota, Minneapolis, MN	Show Cause	Show Cause				

### Globe University/Minnesota School of Business

The institution was notified that its application for recertification with the USDE was denied and it would no longer receive access to Title IV at the end of the year. Hence, the institution initiated a teach-out plan for all of the campuses in the state of Minnesota. With that in mind, the recommendation was to continue the show-cause directive through teach-out.

- MOTION:** Continue Show-Cause
- MOVED:** Ramirez-Rivera
- SECONDED:** Bennett
- ABSTENTIONS:** See Abstentions List.
- ACTION:** Passed

### Dewey University

- MOTION:** Vacate Show-Cause
- MOVED:** Jones
- SECONDED:** Shafer
- ABSTENTIONS:** See Abstentions List.
- ACTION:** Passed

### Everest Colleges (Corinthian)

- MOTION:** Vacate Show-Cause
- MOVED:** Blake
- SECONDED:** Edwards
- ABSTENTIONS:** See Abstentions List.
- ACTION:** Passed

### MJS College School of Nursing and Business External (Adverse) Show-Cause Hearing (In Writing)

Commissioner Thomas continued his presentation of the Panel's review in light of the additional information received from Ms. Toni Herron, Education Compliance Officer at the Indiana Board of

Nursing. The institution, retracted its previous claim of ceasing operations and will be having an administrative hearing with the Board of Nursing in January 2017. As such, the Panel recommends that the show-cause directive be continued to the Council's April 2017, pending receipt of additional information concerning these proceedings.

**MOTION:** Continue Show-cause to April meeting  
**MOVED:** Thomas  
**SECONDED:** Blake  
**ACTION:** Passed  
 (See page 3 for In-Writing Hearing Reports)

**FILE REVIEW DECISIONS**

**I. File Review**

**A. Denial Remand from the Appeals Board**

00023493	Computer Systems Institute, Gurnee, IL
----------	--

Commissioner Edwards summarized the chronology of the institution's review by the Council since the initial show-cause directive in February 2016. Following an appeal to the Review Board, the matter was remanded to the Council which acted to direct the institution to complete third-party verification of its 2016 CAR placement data upon submission to the Council. The third-party options were presented to the Council and an independent group, Auxicent, was chosen. While the placement data were accurate, including employer and graduate satisfaction survey results as required by the Review Board, the outcomes were below Council standards. As such, Commissioner Edwards recommended a continued show-cause directive (from the initial directive) to the institution with review of its 2017 mid-year CAR data at its April 2017 meeting. It was noted that the placements must be first verified and validated through the PVP system prior to inclusion in the submission.

**MOTION:** To continue the institution on show-cause status pending receipt of third party placement verifications and other requested documentation.  
**MOVED:** Edwards  
**SECONDED:** Ramirez-Rivera  
**ACTION:** Passed

**B. Initial Grant Deferral**

00275488	BAU International University, Washington, DC
00267207	Healing Hands Institute, Miami, FL
00270253	Florida Academy of Nursing, Miramar, FL
00236409	South Baylo University - Virginia, Annandale, VA
00230247	South Baylo University, Anaheim, CA
00240200	Agape College of Business and Science, Fresno, CA

00259084	American Institute of Healthcare & Technology, Stratford, CT
----------	---

**MOTION:** To defer action on the institutions' application for initial accreditation

**MOVED:** Edwards

**SECONDED:** Bennett

**ACTION:** Passed

C. Initial Grant Approval

00271557	UEI College, Anaheim, CA
00271555	UEI College, Chula Vista, CA
00271554	UEI College, El Monte, CA
00271550	UEI College, Encino, CA
00270683	UEI College, Huntington Park, CA
00271553	UEI College, Ontario, CA
00271552	UEI College, San Marcos, CA
00271551	UEI College, Stockton, CA
00271549	United Education Institute, Morrow, GA

**MOTION:** Approve the application for initial accreditation for UEI College for a 3-year period, through 2019.

**MOVED:** Leak

**SECONDED:** Thomas

**ABSTENTIONS:** See Abstentions List.

**ACTION:** Passed

D. Initial Grant Approval

00263809	MAIN	The Puerto Rico School of Nurse Anesthetists, San Juan, PR
----------	------	--

**MOTION:** Approve the application for initial accreditation for The Puerto Rico School of Nurse Anesthetists for a 3-year period, through 2019.

**MOVED:** Blake

**SECONDED:** Llerena

**ACTION:** Passed

E. Initial Grant Approval

00271845	MAIN	Larkin Health Science Institute, Miami, FL
----------	------	--

**MOTION:** Approve the application for initial accreditation for the Larkin Health Sciences Institute for a 3-year period, through 2019.

**MOVED:** Fund

**SECONDED:** Edwards

**ACTION:** Passed

F. Renewal of Accreditation Denial

00010791	MAIN	Spanish-American Institute, New York, NY
----------	------	--

Commissioner Fateri summarized the institution’s response to the deferral action which required its demonstration of eligibility with ACICS minimum requirements. The original recommendation was to show-cause the institution why its application should not be denied; however, in light of the institution’s failure to demonstrate that it is still eligible for ACICS accreditation, the institution’s application should be denied.

**MOTION:** Deny renewal of accreditation for Spanish-American Institute.

**MOVED:** Fateri

**SECONDED:** Loveman

**ABSTENTIONS:** See Abstentions List.

**ACTION:** Passed

G. Renewal of Accreditation Denial

00010484	MAIN	West Virginia Business College, Wheeling, WV
00010868	B	West Virginia Business College, Nutter Fort, WV

Commissioners Euliano and Bennett shared the ongoing concerns with the institution’s response to the teams report for its two campuses and its consistent failure to systematize compliance with ACICS standards over its history. A denial of accreditation was recommended and accepted by all.

**MOTION:** Deny renewal of accreditation for West Virginia Business College.

**MOVED:** Euliano

**SECONDED:** Llerena

**ABSTENTIONS:** See Abstentions List.

**ACTION:** Passed

H. Special Visit – Continue Show-Cause Directive

00274252	B	American College of Commerce and Technology - Alhambra, Alhambra, CA
00050228	MAIN	American College of Commerce and Technology, Falls Church, VA

Commissioner Swartzwelder shared with the Council that the full evaluation visits directed to the both campuses during the fall review cycle, in conjunction with the show-cause directive identified over 30 findings between the main campus in Falls Church, VA and the branch in Alhambra, CA. These visits followed a special limited announced visit to the Falls Church campus by a small team in June 2016, upon receipt and review of information from SCHEV. The institution responded to the team’s report and also provided in-person testimony to the show-cause directive. Eight items remained of grave concern to the Council and Commissioner Swartzwelder noted that the institution is scheduled for a renewal of

accreditation visit in Spring 2017. To that end, the recommendation was made to continue the show-cause directive to the August 2017 meeting, with the team’s reports to include assessments of the institution’s response to the eight outstanding items.

- MOTION:** Continue a show-cause directive to American College of Commerce and Technology.
- MOVED:** Swartzwelder
- SECONDED:** Ramirez-Rivera
- ABSTENTIONS:** See Abstentions List.
- ACTION:** Passed

I. Renewal of Accreditation – Continue Show-Cause Directive

00023814	MAIN	Living Arts College @ School of Communication Arts, Raleigh, NC
00033024	B	Living Arts Institute @ School of Communication Arts, Winston Salem, NC

Following its renewal visit in spring 2016, the institution was directed to show-cause because of serious concerns with its data reporting. The institution was also directed to complete third-party verification of its 2016 CAR data. Following its review of the institution’s response and the 2016 CAR data, Commission Fateri recommended that the Council continued the show-cause directive to its April 2017 meeting in light of the CAR results and consistent with the guidelines in Appendix L.

- MOTION:** Continue the In-Writing Show-Cause for Living Arts College
- MOVED:** Fateri
- SECONDED:** Ramirez-Rivera
- ABSTENTIONS:** See Abstentions List.
- ACTION:** Passed

J. Renewal of Accreditation – Continue Show-Cause Directive

00024422	MAIN	SOLEX College, Wheeling, IL
----------	------	-----------------------------

The documentation submitted was still missing pieces and further the administration does not appear to have a full grasp on the necessary reporting practices, although the academic head just recently obtained the position. Commissioner Euliano shared his review of the institution’s application for renewal of accreditation in addition to the testimony provided by institutional representatives at the hearing. The institution’s lack of awareness of the CAR preparation and submission procedures continue to be a concern as well as its outstanding financial issues with the USDE. Consequently the recommendation was made to continue the show-cause on the institution’s renewal of accreditation application.

- MOTION:** Continue the Show-Cause for SOLEX College and request them to respond in writing.
- MOVED:** Euliano
- SECONDED:** Llerena
- ABSTENTIONS:** See Abstentions List.
- ACTION:** Passed

K. Renewal of Accreditation –Vacate Show-Cause

00011220	MAIN	Mountain State College, Parkersburg, WV
----------	------	---

**MOTION:** Vacate the Show-Cause for Mountain State College

**Moved:** Leak

**SECONDED:** Ramirez-Rivera

**ABSTENTIONS:** See Abstentions List.

**ACTION:** Passed

L. Renewal of Accreditation Compliance Warning

			Moved	Second
00015527	MAIN	Northwestern Polytechnic University, Fremont, CA	Euliano	Bennett
00011107	MAIN	Elmira Business Institute, Elmira, NY	Jones	Bennett
00020757	B	Elmira Business Institute, Vestal, NY	Jones	Bennett
00011099	B	Bryan University, Los Angeles, CA	Llerena	Bennett
00023525	B	National College, Bartlett, TN	Edwards	Bennett
00011196	MAIN	International Business College, Fort Wayne, IN	Fateri	Llerena
00011303	MAIN	Ridley-Lowell Business & Technical Inst., New London, CT	Blake	Thomas
00171290	MAIN	Niels Brock Copenhagen Business College, Copenhagen K, Denmark	Edwards	Thomas

**MOTION:** Place the institution/campus on compliance warning (campuses reviewed individually).

**Moved:** See Above

**SECONDED:** See Above

**ABSTENTIONS:** See Abstentions List.

**ACTION:** Passed

M. Renewal of Accreditation Deferrals

00024346	MAIN	Sentara College of Health Sciences, Chesapeake, VA
00033448	B	Ridley-Lowell Business & Technical Institute, Danbury, CT
00010128	MAIN	Bryan University, Topeka, KS
00020207	MAIN	American University of Health Sciences, Signal Hill, CA
00022604	B	Hunter Business School, Medford, NY
00020562	B	Everest College, Tacoma, WA
00010696	MAIN	Hunter Business School, Levittown, NY
00010363	MAIN	Brightwood College, Hammond, IN
00024921	MAIN	California Miramar University, San Diego, CA
00025097	MAIN	PITC Institute, Wyncote, PA
00015803	MAIN	Sullivan College of Technology and Design, Louisville, KY
00010596	MAIN	Vet Tech Institute of Houston, Houston, TX

**MOTION:** Defer an action on the renewal of accreditation application for these 12 campuses

**MOVED:** Edwards  
**SECONDED:** Bennett  
**ABSTENTIONS:** See Abstentions List.  
**ACTION:** Passed

**N. Renewal of Accreditation Approvals**

00019725	B	West Virginia Junior College, Bridgeport, WV
00010481	MAIN	West Virginia Junior College, Charleston, WV
00016100	B	Everest College, Chesapeake, VA
00010407	MAIN	Everest College, Everett, WA
00011314	MAIN	Everest College, Newport News, VA
00012511	MAIN	Manhattan School of Computer Technology, Brooklyn, NY
00045500	B	McCann School of Business and Technology, Shreveport, LA
00053102	MAIN	Provo College, Provo, UT
00108638	MAIN	Valley College, Beckley, WV
00108644	MAIN	Valley College, Princeton, WV
00024280	B	Beckfield College, Springdale, OH
00010950	MAIN	Lincoln Technical Institute, Iselin, NJ
00011304	B	Lincoln Technical Institute, Moorestown, NJ
00015671	B	Lincoln Technical Institute, Paramus, NJ
00019355	B	Lincoln Technical Institute, Philadelphia, PA
00010096	MAIN	Pinnacle Career Institute, Lawrence, KS
00170656	B	Trillium College Kingston, Kingston, Canada
00010552	MAIN	Stevens - The Institute of Business and Arts, Saint Louis, MO
00022603	B	National College, Memphis, TN
00249348	B	Florida Technical College, Cutler Bay, FL
00059982	MAIN	Manhattan Institute of Management, NEW YORK, NY
00265917	B	Dorsey School of Business, Taylor, Taylor, MI

00109005	MAIN	American University In Bosnia and Herzegovina, Tuzla, Bosnia And Herzegovina
00011157	MAIN	Ohio Valley College of Technology, East Liverpool, OH
00010341	B	Metro Business College, Jefferson City, MO
00180852	B	Brightwood College, Indianapolis, IN

**MOTION:** Approve the applications for a renewal of accreditation for 26 campuses

**MOVED:** Bennett

**SECONDED:** Edwards

**ABSTENTIONS:** See Abstentions List.

**ACTION:** Passed

O. Special Visits Compliance Warning

00068978	MAIN	Columbia College, Vienna, VA
00023525	B	National College, Bartlett, TN

**MOTION:** Place 2 campuses on compliance warning

**MOVED:** Leak

**SECONDED:** Fateri

**ABSTENTIONS:** See Abstentions List.

**ACTION:** Passed

P. Special Visit Deferral--Gallipolis Career College, Gallipolis, OH (00011098)

00020978	B	American Educational College, Vega Alta, PR
00010934	MAIN	Fortis Institute, Erie, PA

**MOTION:** Defer action on the special visit report for these 2 campuses

**MOVED:** Leak

**SECONDED:** Fateri

**ABSTENTIONS:** See Abstentions List.

**ACTION:** Passed

Q. Special Visit Approvals (23 campuses)

00238610	B	UEI, Phoenix, AZ
00053102	MAIN	Provo College, Provo, UT
00010165	B	Brown Mackie College - Findlay, Findlay, OH
00020239	B	Brown Mackie College - Atlanta
269949	B	Gwinnett Institute
00223527	MAIN	BIR Training Center, Chicago, IL
00170962	B	Brightwood College, Chula Vista, CA
00173481	MAIN	Brightwood College, San Diego, CA

**MOTION:** Approves compliant status of the special visits for these 8 campuses

**MOVED:** Leak

**SECONDED:** Bennett

**ABSTENTIONS:** See Abstentions List.

**ACTION:** Passed

R. QAM Visit Compliance Warning

00010845	MAIN	Key College, Dania Beach, FL
----------	------	------------------------------

**MOTION:** Place the institution on compliance warning for its quality assurance monitoring review

**MOVED:** Leak

**SECONDED:** Guinan

**ABSTENTIONS:** See Abstentions List.

**ACTION:** Passed

S. QAM Visit Deferrals

T.

00168008	B	Redstone College - Denver East, Westminster, CO
00027075	MAIN	Redstone College, Broomfield, CO
00036481	MAIN	Global Health College, Alexandria, VA
00103319	MAIN	Texas Health and Science University, Austin, TX
00024852	MAIN	Peloton College, Dallas, TX
00011303	MAIN	Ridley-Lowell Business & Technical Inst., New London, CT
00240580	B	Nobel University - Buena Park, Buena Park, CA
00019411	MAIN	Stratford University, Falls Church, VA

**MOTION:** Defer action on the quality assurance monitoring reviews for the 8 campuses

**MOVED:** Edwards

**SECONDED:** Bennett

**ABSTENTIONS:** See Abstentions List.

**ACTION:** Passed

U. QAM Visit Approvals

00262761	MAIN	Madison Media Institute, Madison, WI
00035142	MAIN	Charter College - Vancouver, Vancouver, WA
00012781	B	Lincoln Technical Institute, Somerville, MA
00093164	B	Golf Academy of America, Farmers Branch, TX
00060366	MAIN	Emerging Technologies Institute, Forest Hills, NY
00035150	B	Miller-Motte Technical College, Conway, SC
00225377	MAIN	California Institute of Advanced Management, El Monte, CA
00012804	MAIN	Valley College, Martinsburg, WV
00108644	MAIN	Valley College, Princeton, WV
00242406	B	EDIC College, Carolina, PR

00053102	MAIN	Provo College, Provo, UT
00010506	MAIN	Spencerian College, Louisville, KY
00262761	MAIN	Madison Media Institute, Madison, WI
00011101	MAIN	Everest College, Thornton, CO
00011150	MAIN	Florida Career College - Miami, Miami, FL
00033448	B	Ridley-Lowell Business & Technical Institute, Danbury, CT
00010363	MAIN	Brightwood College, Hammond, IN
00010825	MAIN	Laurel Business Institute, Uniontown, PA
00221316	B	Virginia College, Lubbock, TX
00108644	MAIN	Valley College, Princeton, WV

**MOTION:** Approve the quality assurance monitoring reviews for 20 campuses

**MOVED:** Bennett

**SECONDED:** Edwards

**ABSTENTIONS:** See Abstentions List.

**ACTION:** Passed

Chair Edwards adjourned the meeting at 12:53 p.m. on Friday, December 9, 2016

## ABSTENTIONS

See Attachment.

**Case Name:** *In the Matter of* Accrediting Council for Independent Colleges and Schools

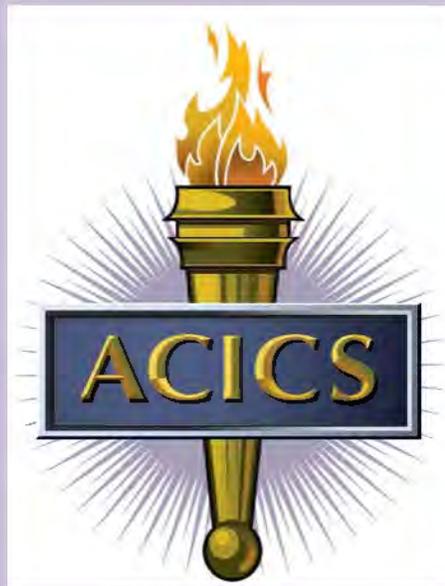
**Docket No.:** 16-44-O

**Filing Party:** Respondent, Accrediting Council for Independent Colleges and Schools

**Exhibit No.:** B-O-109

**ACCREDITING COUNCIL FOR  
INDEPENDENT COLLEGES AND SCHOOLS**

**STAFF HANDBOOK**



**January 2015**

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**ACKNOWLEDGEMENT/RECEIPT**

## **INTRODUCTION**

This handbook is intended as a reference and to provide all Accrediting Council for Independent Colleges and Schools (ACICS) employees with a general understanding of our personnel policies. You are encouraged to familiarize yourself with the contents of this handbook, for it will answer many common questions concerning employment with ACICS; however, we cannot anticipate every situation or answer every question, so if you do have questions, please speak with your supervisor or the Vice President of Administration.

Recommendation for changes in these policies can be made to the President and/or the Vice President of Administration. Matters not covered in the handbook which may warrant new policies may be introduced at any time. However, no changes to existing policy or policy additions will be effective until authorized by the President of ACICS for inclusion in the handbook. Interim policy changes and guidance may be provided by memorandum until this manual is formally amended.

In order to retain necessary flexibility in the administration of policies and procedures, ACICS reserves the right to change, revise or eliminate any of the policies and/or benefits described in this handbook at any time. You are an employee at will, subject to termination with or without cause. Moreover, this handbook does not create a contract of employment between ACICS and its employee(s). As noted, it is impossible for any handbook to anticipate all situations, and accordingly, ACICS must reserve the right to respond to any particular situation in the manner which it best believes will promote equity, fairness, and the interests of ACICS.

Our compensation policies and benefits programs are designed to make ACICS a rewarding place to work. We want your time with ACICS to be a positive experience, and we will endeavor to support you throughout the duration of your service to the Accrediting Council for Independent Colleges and Schools.

### **1. ACICS STRUCTURE**

- A. The President operates under the authority of and reports to the Board of Vice Presidents. All other ACICS employees follow the direction of the President.
- B. All employees operate under the authority of and report to their immediate supervisor within the structure of the ACICS organizational chart. The chart is available upon request from the office of the Vice President of Administration.

## **2. CLASSIFICATION OF EMPLOYEES**

- A. Under the guidelines of the Fair Labor Standards Act (FLSA) and applicable to the provisions of the District of Columbia (DC) wage and hour law, all positions are designated as either exempt or non-exempt from the minimum wage and overtime requirements of applicable wage and hour laws. If you are uncertain whether your position is designated exempt or non-exempt, clarification is available from supervisors or the Vice President of Administration.
1. Exempt positions generally include executive, administrative, and professional positions as defined by law. Employees with exempt positions are paid on a salary or fee basis and are not entitled to overtime pay.
  2. Non-exempt positions include all hourly paid positions, as well as positions which do not qualify for an exemption noted above. Employees with non-exempt positions are entitled to overtime pay under the applicable provisions of federal and DC wage and hour law.
- B. Employees are classified as full-time, part-time, intern, or temporary.
1. Full-time employees are those scheduled to work 37.5 hours per week (or more) on a regular schedule. Generally, they are eligible to receive the ACICS benefits package and are subject to the terms, conditions, and limitations of each benefit program.
  2. Part-time employees are those authorized to work less than 34 hours per week on a regular schedule. They will be eligible to receive some ACICS benefits subject to the terms and limitations of each benefit program. The description of each benefit program will include specific eligibility information.
  3. Intern employees are those scheduled to work on a limited term schedule. They will not be eligible to receive ACICS benefits other than those required by law.
  4. Temporary employees are those who are hired for a limited period of time, in order to supplement the work force temporarily. Generally, temporary employees are not eligible for any ACICS benefits other than those required by law.
  5. Independent Contractors are individuals retained pursuant to contract or agreement in order to complete specific projects or provide consultative services on an "as needed" basis to ACICS. Independent contractors are not employees of ACICS and are not eligible for ACICS benefits. All state and federal taxes and withholding on any amounts paid the contractor pursuant to the contract or agreement will be the responsibility of the contractors, not ACICS.

## **3. EQUAL EMPLOYMENT OPPORTUNITY**

- A. In order to provide equal employment and advancement opportunities to all individuals, employment decisions at ACICS will be based on merit, qualifications, and abilities as well as the needs of ACICS. ACICS employment practices and decisions will not be influenced or affected by an applicant's or employee's race, color, religion, sex, national origin, age, disability, sexual orientation, political opinion, or any other characteristics protected by applicable law.

- B. ACICS will make reasonable accommodations for qualified individuals with disclosed disabilities in order to enable them to perform the requirements of their job position unless doing so would result in an undue hardship to ACICS. This policy governs all aspects of employment, including selection, position assignment, compensation, discipline, termination, and access to benefits and training.
- C. Any employees with questions or concerns about any type of discrimination in the workplace are encouraged to bring these issues to the attention of their immediate supervisor, the Vice President of Administration, or the President. Employees can raise concerns and make reports without fear of reprisal. Anyone found to be engaging in any type of unlawful discrimination will be subject to disciplinary action up to and including termination of employment.

#### **4. RECRUITMENT PROCESS**

Requests for filling approved, budgeted, and vacated positions are handled by the President and the Vice President of Administration. Vacant positions will be posted, as appropriate, for the information of all employees.

Beginning compensation packages must be approved by the President before formal offers of employment are made.

##### **A. Internal Recruiting**

ACICS supports advancement opportunities for its employees and encourages qualified employees to apply for open positions.

An employee's current status will not be prejudiced by either the expression of interest in or application for an open position. Qualifications for promotions will be based on position requirements, the demonstrated capabilities of the employee, and in compliance with our Equal Employment Opportunity policy.

Employees may apply for open positions for which they feel qualified. When application is made for an open position, employees should contact their supervisor to discuss their interest and should contact the Vice President of Administration to discuss, informally, the position requirements and duties.

##### **B. External Recruiting**

Open positions are often externally posted through advertisements in local and national newspapers, listed with local member institutions' school placement offices, and with local employment and temporary agencies, as the budget permits. The Vice President of Administration will review all applications.

##### **C. New Hires**

All offers of employment are contingent on the verification of the individual's rights to accept employment and work in the United States. All new employees will be required to provide documentation in order to permit ACICS to complete employment verification as required by federal law. If individuals are unable to verify their employment eligibility or, where appropriate, their continued eligibility to engage in employment, ACICS may be required to terminate their employment.

#### **5. ADVANCEMENT AND PROMOTION**

- A. It is the policy of ACICS to encourage employee advancement into new positions and, whenever possible, to promote from within the organization. Ability to perform the new position responsibilities is of primary importance.
- B. Position vacancies are posted on the kitchen bulletin board and on the internal office e-mail as they become available so that qualified employees may apply.
- C. No adverse action will be taken against any employee who is not the successful candidate; it will not affect current position or status.

## **6. PROFESSIONAL CONDUCT**

ACICS considers a consistent and professional attitude, whether in the office or traveling on business, to be an essential function of every position. While different positions have different primary areas of responsibility, ACICS expects your best efforts on behalf of the entire organization.

ACICS expects all employees to voice concerns and constructive criticism solely to management, and never, under any circumstances express views to member institutions, Commissioners, Evaluators, or media critical of the processes or administration of ACICS. Violation of this rule will result in disciplinary action, which may include immediate termination.

## **7. WORKDAY**

- A. The regular workday is 8:30 a.m. to 5 p.m. Vice Presidents may approve different regular working hours but only if that is consistent with ACICS staffing needs.
- B. Meal period. Non-exempt employees are provided with one unpaid meal period of one hour each workday. Staff is encouraged to take their one hour meal period between 12:00 noon and 2:00 p.m. each day. Supervisors will schedule meal periods to accommodate operating requirements. Non-exempt employees will be relieved of all active responsibilities and restrictions during meal periods.
- C. Time records. Federal law and ACICS require that employee time records accurately reflect the hours worked by employees. Time record procedures will be reviewed with each employee at the start of employment. All time records must be signed by a supervisor.

## **8. DRESS CODE**

In a professional organization with a public profile staff members are expected to act and dress accordingly. All attire must be appropriate for the business environment at ACICS. There are three types of attire that may be worn at ACICS. Business casual is the standard, everyday dress code. This includes appropriate slacks and collared shirts for men and appropriate slacks with blouses or sweaters, skirts with blouses or sweaters, or dresses for women. When professional dress is necessary, men are expected to be in conservative suits or sport coats and slacks, dress shirt and tie, and dress shoes and socks. Women are expected to dress in generally accepted conservative business attire. On most Fridays (except on Fridays during workshops, IRC, Council, or other announced meeting dates), casual attire is appropriate.

## 9. SALARY ADMINISTRATION

- A. Position descriptions are maintained in the Vice President's office for each position and include functional responsibilities and duties. Employees will receive a copy of their position descriptions. Supervisors are responsible for ensuring that position descriptions are accurate and reflect responsibilities and duties of each position.
- B. An Annual Staff Performance Review will be completed on an employee's annual anniversary of hire. This will include updating goals, realigning position descriptions, and discussing areas of improvement and achievements.
- C. Salary progression will be based on the quality of individual performance. Increases, if deemed appropriate, will commence on an employee's annual anniversary of hire.
- D. An extended leave of absence (whether paid or unpaid) may affect the timing of Performance Reviews and any salary adjustments.
- E. New employees will receive a six month review and setting of goals.
- F. The regular work week for full-time employees is a minimum of 37.5 hours per week, excluding holidays listed in Section 11 of this handbook.
- G. Compensatory time may be provided to exempt employees who are deemed ineligible for overtime as follows:
  - 1. Compensatory time is earned for mandatory holiday or weekend work. This could include, but is not limited to, attendance or participation in an ACICS seminar or convention, working on an officially designated holiday, or working on Saturday or Sunday during a Council meeting. Time earned is equivalent to time worked with a maximum 7.5 hours earned per day.
  - 2. Other than for business travel, working during times for which compensatory time is earned must be approved by the supervisor involved prior to the beginning of the work period.
- H. Compensatory time for exempt employees who travel:
  - 1. Weekend travel earns compensatory time as follows:
    - a. Site Visits – Sunday or holiday travel from home to the site visit earns a half day (3.75 hours) compensatory time (necessary for the pre-visit meeting with the team).
    - b. ACICS Designated Events - Saturday or Sunday travel "to/from" earns 3.75 hours compensatory time.
    - c. Weekend travel resulting from staying over a Friday or Saturday night before, between or after completing a Site Visit does not earn compensatory time unless approved by supervisor.
  - 2. Compensatory time should be used as soon as possible after it is earned.

- a. Advance approval must be received from the employee's immediate supervisor for compensatory time to be used. Scheduling and use of compensatory time is subject to office and personal workloads.
  - b. Unused compensatory time will not be paid or otherwise compensated at the time of separation from employment.
- I. Overtime - Non-exempt employees may occasionally be called upon to work additional hours beyond their regular schedule. In accordance with applicable laws, all hours worked up to 40 hours in any weekly non-exempt employees will be paid on a straight time basis. Hours worked over 40 in any work week will be paid for at 1½ times the regular hourly wage. In calculating the hours worked in a week, annual leave or other paid excused time is deducted from the total paid hours. No additional hours may be worked without prior approval in writing by the employee's supervisor. Any unsupervised work must be approved in advance and work results must be demonstrated. Such work must also be performed at the business office of ACICS, except as noted in subparagraph I, below. Exempt employees are not eligible for, and will not be paid overtime for hours worked in excess of 40 in any given work week.
- J. ACICS does not compensate employees for hours worked while away from the office other than for the following:
  - 1. Authorized business travel
  - 2. Company sponsored events/activities
  - 3. Authorized leave
  - 4. Working from home as part of maternity/paternity leave (pre-approved only by the President on a case by case basis)
  - 5. Working offsite at Vice President's discretion with President's prior approval
- K. Pay day is every other Friday. If pay day falls on a bank holiday, employees will be paid on the last prior workday. Employees should review their paycheck carefully and report any errors or questions to the Vice President of Administration immediately.
- L. Pay checks for payroll employees are deposited directly to the employees' personal account via electronic funds transfer at their request. All employees must deliver approved time sheets to the Vice President of Administration or the Human Resources Assistant five days prior to the scheduled pay day in order for those hours to be reflected on the next pay check.
- M. Payroll advances are not permitted by ACICS.

## **10. EMPLOYEE RECORDS**

- A. It is the policy of ACICS to maintain official personnel records in the HR office for every staff member. These records are maintained during the term of employment and for a period of time thereafter as required by law. Personnel records serve the employee by providing a reliable record of the period of employment for future reference.
- B. **CONTENT:** The employee information is maintained as follows:
  - 1. The personnel file includes:

Application for employment;  
Resume;  
Letter of appointment to ACICS;  
Personnel change form and related correspondence;  
Originals of the Staff Performance Plans and Annual Performance Reviews that have been signed by the employee and supervisor;  
Employee authorizations for payroll deductions;  
Academic transcripts, proof of degree, professional development;  
Other appropriate material submitted by the employee or supervisor.

2. The personal file contains:
  - Health records;
  - Tax information;
  - Emergency contact information;
  - Retirement plan information;
  - Other private/restricted access information.
3. Separate file: Form I-9 and documentation of right to accept employment in the United States.

- C. EMERGENCY CONTACT INFORMATION. All employees must provide emergency contact information for persons to be contacted in the event of a personal emergency. Emergency contact information is confidential and will not be made available to nonessential staff. Emergency contact information may not be used for any purposes other than its original intention.

All employees are required to supply emergency contact information—it is each employee's personal decision as to whom he or she chooses to have as the emergency contact. In an effort to keep information current should an emergency arise, employees are asked to verify emergency contact information at least annually or as requested.

- D. UPDATES. Employees should promptly report in writing to the Vice President of Administration changes in home address, telephone number, and the name, address, and telephone number of a person to be notified in the event of an emergency. Additionally, changes in name, marital status, and dependents should be promptly reported for the purpose of tax exemptions and administration of staff benefits.

E. ACCESS TO AND RELEASE OF CONTENTS

1. Employees have a right to inspect their own personnel file in the presence of the Vice President of Administration. The employee's personnel file is also available for inspection by the employee's supervisor and any prospective supervisory staff member officially considering recruitment of the employee.
2. The Vice President of Administration will, with prior employee approval, verify the date of employment, position held, and annual gross salary reported to creditors by employees. Information is verified by telephone and/or in writing. Any employee who does not wish to have information verified should notify the Vice President of Administration in writing. The Vice President of Administration will not release the home address and telephone number of any employee without the consent of the employee.

## 11. EMPLOYEE BENEFITS

Eligible employees at ACICS are provided a wide range of benefits. A number of the programs (such as Social Security, workers' compensation, state disability, and unemployment insurance) cover all employees in the manner prescribed by law.

The following benefit programs are available to eligible full time employees:

- Annual Leave (Vacation and Sick Days)
- Benefit Conversion at separation
- Dental Insurance
- Direct Deposit
- Family Medical Leave
- Flextime Scheduling
- Funeral Leave
- Holidays
- Jury Duty Leave
- Life Insurance
- Short/Long Term Disability
- Medical Insurance
- Military Leave
- Parental Leave
- Professional Development (as approved by President)
- 401(a) Profit Sharing Plan
- 403(b) Retirement Plan

Some benefit programs require contributions from employees, but most are fully paid by ACICS. For a regular full-time employee, the benefits package value is approximately 25% percent in addition to annual salary.

## **12. HEALTH BENEFITS PLAN**

ACICS provides a comprehensive health benefit and dental package for full time employees. A monthly co-pay (as determined annually by management) is required for participation.

Part time employees may participate in ACICS health and/or dental plans after 3 months of employment at the following rates:

- Authorized to work between 15 and 24 hours per week - ½ policy premium
- Authorized to work between 25 and 34 hours per week - ¼ policy premium

Interns are not eligible to participate in ACICS health benefit plans.

## **13. PENSION PLANS**

ACICS provides a 401(a) profit sharing plan as defined by the Employee Retirement Income Security Act (ERISA). All employees are eligible to participate if they work 1000 hours in a 12 month period.

All full time and part time employees are immediately eligible to make contributions to the ACICS 403(b) retirement plan.

## 14. HOLIDAYS

- A. Days Observed
- |                                   |                        |
|-----------------------------------|------------------------|
| New Year's Day                    | Columbus Day           |
| Martin Luther King, Jr's Birthday | Veteran's Day          |
| Presidents' Day                   | Thanksgiving           |
| Memorial Day                      | Day after Thanksgiving |
| Independence Day                  | Christmas Eve          |
| Labor Day                         | Christmas Day          |

If any of these paid holidays falls on Sunday, the following Monday will be observed; or if any of these holidays falls on Saturday, the preceding Friday will be observed.

Typically the office building is closed and provides limited services on the above holidays. For their safety and security, employees should notify their immediate supervisor if they plan on working in the office during a holiday.

- B. Any additional recognized religious holidays that are significant to an individual employee may be taken subject to advanced approval of the immediate supervisor and will be charged to annual leave.
- C. Part-time employees and interns will not be paid for holidays.

## 15. ANNUAL LEAVE (Vacation Time and Sick Days)

Employees are encouraged to use available vacation time and holidays. ACICS policy requires employees to verify hours worked and/or hours compensated as well as leave, holidays, etc., in the appropriate time/leave forms. These forms should be approved by the immediate supervisor, attached to the timesheet, and submitted to the Vice President of Administration five days prior to the scheduled pay day in order for leave hours to be reflected in the next pay cycle.

- A. Annual Leave for vacation periods and sick days are combined. Leave is granted to all full-time and part-time employees after one month of employment. Annual leave for full-time employees is in accordance with the following schedule:

<u>Year of Employment</u>	<u>Number of Annual Leave Days*</u>
New Hire through Fifth	20
Sixth through Tenth	30
Eleventh and Subsequent	40

Part-time employees authorized to work between 15 and 24 hours a week will accrue annual leave at  $\frac{1}{2}$  of the full-time rate. Part-time employees authorized to work between 25 to 34 hours a week will earn  $\frac{3}{4}$  of the full time rate.

Interns do not accrue annual leave.

\* Annual leave is a combination of vacation and sick days.

- B. The accruing Annual Leave rate will be based upon length of service. Employees will receive 5.77 hours accrued leave each pay period for the first 5 years of employment. After completion of five years of employment the accrual rate is 8.65 hours for each pay period. After completion of ten years the accrual rate is 11.54
- C. The maximum amount of annual leave that may be accrued is 225 hours. No annual leave will be earned or accrued over the 225 hour accrual limit.
- D. Scheduling of annual leave time is important. ACICS requires that all annual leave, except for medical or personal emergencies, be scheduled and approved by the employee's supervisor at least two weeks in advance. Employees are also encouraged to take at least five consecutive days of annual leave for vacation purposes during each year. The earlier an employee requests annual leave time, the more likely it is that the request can be approved.
- E. Medical or personal emergencies. Supervisors are to be notified as soon as possible. The employee must take responsibility for ensuring such contact is made and arrangements for critical work-related events are identified.
- F. Unanticipated absence. It is the responsibility of each employee to:
  1. Notify his/her supervisor in any situation that results in an unanticipated absence from work. A message of the absence left on voicemail and/or e-mail with a phone number where the employee may be reached is acceptable. Employees must contact their supervisor, the Vice President of Administration, or one of the Vice Presidents if the immediate supervisor is unavailable. Messages left with employees having no supervisory role in the employee's work area does not constitute notification; and
  2. Inform his/her supervisor of any work-related activity that needs attention during the unanticipated absence. Failure to properly report absences may result in disciplinary action.
  3. If an employee is absent for three or more days due to an illness or injury, a physician's statement may be required verifying the illness or disability and its beginning and expected ending dates.
- G. Termination of employment. Full-time or part-time employees who terminate their employment from ACICS will be compensated for all accrued and unused annual leave.

## 16. MATERNITY AND PATERNITY LEAVE

Paid Maternity and Paternity Leaves of absence may be requested by qualifying employees for the birth or placement of a child for foster care or adoption. In order to qualify for this leave, the employee must have worked the twelve continuous months prior to the commencement of the leave and at least 1,000 hours during this twelve-month period. Maternity and Paternity Leave is not charged against the employee's leave credit and the maximum amount of Maternity and Paternity Leave is 100 hours. Part-time employees are entitled to Maternity and Paternity Leave if employee has worked the twelve continuous months prior to the commencement of the leave and at least 1,000 hours during this twelve-month period. Part-time employees benefit is pro-rated in accordance with their schedule. For example, an employee who works  $\frac{3}{4}$

time, will be entitled to 75 hours of Maternity and Paternity Leave. Temporary and contract employees are not eligible for Maternity and Paternity Leave.

Maternity and Paternity Leave may be used intermittently before or after the birth or placement of the child for adoption or foster. In the event that the employee qualifies for short term disability in connection with the birth of the child, Maternity and Paternity Leave may be used after short term disability leave benefits terminate.

During Maternity and Paternity Leave, employees will continue to accrue leave and receive health insurance benefits; provided that if the organization changes health benefits rates or coverage for all employees, during leave health benefits may change in accordance with organization-wide changes to coverage and/or rates.

Maternity and Paternity Leave may be used in increments no smaller than one hour. Unused Maternity and Paternity Leave will expire six months after the birth or placement of the child for adoption or foster care. If both parents are employed by ACICS, only one is entitled to Maternity and Paternity Leave. The parents shall designate the parent who will use the leave.

Paid leave under this policy shall run concurrently with any leave entitlement under the District of Columbia Family and Medical Leave Act ("DCFMLA") or any other law entitling the employee to leave. To the extent that the employee is entitled to DCFMLA leave beyond the leave period covered by this policy, the employee shall first use any other accrued but unused leave and then the remainder of any DCMLA leave shall be unpaid.

The employee must submit a written request for Maternity and Paternity Leave to their immediate supervisor and the human resources department as far in advance of the anticipated leave date as practicable. If the absence is due to an emergency, the employee or a member of their immediate family must inform the immediate supervisor or the head of their department as soon as is practicable; this should be followed up with a written leave request, normally submitted within three days of the beginning of the leave. All medical leave requests must be accompanied by appropriate medical certification from the employee's physician, indicating the condition necessitating the leave request and the projected date of return to work.

If the Maternity and Paternity Leave is due to the employee's own health related issue, the employee may be required to present ACICS with a note from their physician indicating that the employee is capable of returning to work and performing the essential functions of their position, with or without reasonable accommodation. (Note: ACICS will consider making reasonable accommodation to any disability in accordance with applicable laws where required).

## **17. FAMILY MEDICAL LEAVE**

ACICS provides leaves of absence to eligible employees in accordance with the District of Columbia Family & Medical Leave Act ("DC FMLA"). In general, an employee who has been employed at ACICS for at least one year and who has worked a minimum of 1000 hours in the 12 months prior to the first day of the leave is eligible for a family or medical leave of absence.

If you have further questions regarding DC or Federal FMLA leave, please contact the Vice President of Administration.

## 18. PARENTAL LEAVE

In accordance with DC law, ACICS will grant qualifying "parental leave" to parents of school age children in order to permit them to attend school related events involving the parent's child up to a total of 24 hours during any 12 month period. For purposes of this policy, parent includes the natural parents, persons with legal custody, guardians, aunt, uncles and grandparents as well as the spouse of any of the foregoing.

ACICS may deny parental leave where its grant would disrupt ACICS' business or make the delivery of services difficult. All such leave provided under this policy shall be unpaid unless the parent elects to use paid leave provided by ACICS.

Employees who want to take parental leave are expected to give at least 10 calendar days notice prior to the event, unless the need to attend the school related events cannot be reasonably foreseen.

School related events include activities sponsored by the school or associated organization such as a PTA and includes performances in plays, concerts, rehearsals, sporting games or practice, meeting with a teacher or counselor or any other similar type of activity.

## 19. FUNERAL LEAVE

All regular full-time and part-time employees will be entitled to receive up to 3 days leave with pay in the event of the death of a member of their immediate family. The immediate family is defined as father, mother, husband, wife, brother, sister, child, grandparents, grandchildren, or any other individual living in the household of the employee or the corresponding relative of the employee's spouse. Up to one day of leave with pay will be granted for an employee to attend the funeral of other close relatives of the employee.

Should more days be needed, they may be taken as annual leave days or they may be taken without pay subject to the discretion of the immediate supervisor and the President. For part-time or temporary employees, leave without pay will be granted upon the death of a member of the immediate family.

## 20. MILITARY LEAVE

**Temporary**-Time off without pay will be granted for required military duty for employees enlisted in the National Guard or inactive reserves. Employees should notify their supervisor of planned training as soon as possible to permit appropriate scheduling and should provide a copy of their orders upon receipt.

**Extended**- Employees entering active military service of the United States are granted a leave of absence without pay pursuant to federal law (see "Your Rights Under USERRA") for the period of service. Employees should provide notice of entry to their supervisor to facilitate scheduling.

Upon the conclusion of service, the employee may be reinstated after completion of military service provided the employee retains the ability to perform the duties of the

job and provided that ACICS' circumstances have not changed to make it impossible or unreasonable to reemploy that person. To be eligible for reinstatement, the employee must make written request for reinstatement within the period after discharge specified by USERRA and otherwise comply with the requirements of USERRA.

While serving in active duty, you may continue your health insurance coverage for you and your dependents for up to 24 months. If you elect not to continue your health insurance coverage you may be re-instated without any waiting periods or exclusions upon re-employment.

## **21. JURY DUTY**

When called upon, employees are encouraged to participate in jury duty.

- A. Employees will be paid their regular pay for five days or less of service on jury duty. More than five days of jury duty, employees will not be paid until return to regular work hours.
- B. Either the employee or ACICS on behalf of the employee may request an excuse from jury duty if the employee's absence would create serious operational difficulties.

## **22. FEDERALLY DECLARED EMERGENCIES, WEATHER DAYS, AND UNANTICIPATED HOLIDAYS**

- A. Employees are to follow instructions as broadcast on public radio stations during federally declared emergencies.
- B. ACICS will normally follow the policy of the federal government regarding weather emergency days.
  - 1. The ACICS office will be closed when the federal government is closed. In the event of area-wide closings, ACICS will follow the federal government's Policy of Excused Absence. If ACICS is closed for a weather emergency, employee absences will not reduce annual leave.
  - 2. Liberal Leave (Due to Weather Emergency). In the case of a federally declared weather emergency (without federal closings), taking leave, arriving late or leaving early is at the discretion of the employee. The employee does not need prior approval of the immediate supervisor. However, the employee is responsible for following the same notification process as taking annual leave. If the employee does not report to work, he/she will take annual leave for that time in which ACICS was open and operating under federal Liberal Leave Weather Emergency Policy.
- C. Unanticipated federally declared holidays or non-weather closures will be handled on a case by case basis by the President.

## **23. PROFESSIONAL DEVELOPMENT**

ACICS supports the continued intellectual growth of each employee. Full Time regular employees in good standing, with at least one year of employment are eligible, to the

extent that ACICS funds are available, for the following professional development assistance:

- A. ACICS professional development prepaid programs are free to the employee and attendance is scheduled at the convenience of the employee and immediate supervisor. Proof of attendance will be submitted to Human Resources to be filed in employee folder.
- B. Seminars and workshops fees (including travel and lodging) up to \$2,500 a fiscal year for full time employees.
  - 1. Employee will submit a Professional Development Approval Request with a printout of seminar brochure or informational website and estimated cost of program (including travel and lodging) to immediate supervisor and President prior to enrolling in seminar.
  - 2. Employee may take the seminars on company time and will schedule seminars at the convenience of the ACICS work schedule.
  - 3. Proof of attendance will be submitted to Human Resources to be filed in employee folder.
  - 4. The cost of pursuing or maintaining a certification or license (such as Notary Public) for the benefit of ACICS will not be calculated in the \$2,500 limit.
  - 5. Part-time employees' participation in seminars and workshops will be considered on a case by case basis.
  - 6. If an employee chooses to leave ACICS voluntarily, all seminars, workshops, certification payments made within six months preceding the departure of an employee must be repaid to ACICS. The six month repayment period starts on the last day of the seminar, workshop, and certification program attended or the payment date, whichever is later.
- C. Employees tuition assistance is available for full time employees up to \$5,000 per fiscal year for programs of study leading to an undergraduate and/or graduate degree related to ACICS activities. It is expected that skills learned will improve productivity in the employee's current position.
  - 1. Employee will submit a Professional Development Approval Request form, degree plan, and a letter of acceptance into a program of study leading to a degree to the immediate supervisor and President. These forms must be submitted prior to enrolling in classes accompanied by an explanation of how the degree will enhance the skills and knowledge that the employee uses in his/her position with ACICS.
    - a. Eligible courses will be taken on the employee's own time and from an institution accredited by a U.S. Department of Education recognized accrediting agency.
    - b. Employees may not have more than two courses reimbursed per academic term.
  - 2. Tuition Reimbursement –

- a. Does not include costs for books or equipment but it may include registration and laboratory fees.
  - b. Will be made for tuition costs upon receipt of verification that courses have been completed with grades of "C" or above for undergraduate courses and "B" or above for graduate courses.
  - c. Will only be made upon the completion of the course and the submission to accounting of a request for reimbursement with the original grade report attached (the original will be copied and returned).
3. Part-time employees' participation in tuition reimbursement will be considered on a case by case basis.
  4. If an employee chooses to leave ACICS voluntarily, all tuition reimbursements made within six months preceding the departure of an employee must be repaid to ACICS. The six month repayment period starts on the last day of the course attended or the tuition payment date, whichever is later.

## **24. ALL STAFF MEETINGS**

All Staff meetings are scheduled on a regular basis for the benefits of exchanging information, training, and developing staff. Attendance for All Staff meetings is encouraged for all employees. Excused absence from All Staff meetings will be obtained in advance at the discretion of the President.

## **25. CREDIT CARDS AND MEMBERSHIPS**

Staff members whose responsibilities include on-site institutional evaluations, regular travel and/or purchasing by credit card for ACICS expenses may be issued a corporate credit card in their name and will be reimbursed for said card's annual fee. Upon receipt of the credit card, employee will sign an agreement on the use of the credit card. It is the employee's responsibility to submit requests on a timely basis for reimbursement of all expenses charged and to pay the balance on the card at least monthly. With no exception, personal expenses may not be charged on the corporate credit card. Using the card for personal expenses, failure to submit reimbursements or failure to pay the monthly balance before the end of the next billing cycle are subject to appropriate counseling intervention by the Finance Vice President. Repeated personal expenses and/or failure to pay the monthly balance will lead to termination of the corporate credit card.

Upon termination (voluntary or involuntary), the final reimbursement request may be paid directly to the credit card company.

Employees may use their personal credit cards for charging ACICS expenses. However, annual fees for personal credit cards or travel (airline) memberships clubs will not be reimbursed.

## 26. SMOKING

In keeping with ACICS' intent to provide a safe and healthful work environment, smoking is prohibited throughout the workplace. This policy applies equally to all employees and visitors. This policy also complies with the no smoking policy of building management.

## 27. DRUGS AND ALCOHOL

No employee shall consume alcohol or use illegal drugs on ACICS premises during working hours or report to work under the influence of alcohol or illegal drugs. No employee shall consume or have in their possession alcoholic beverages on ACICS premises unless it is at an office function approved by the President. No employee shall partake or have in their possession any illegal drugs on ACICS premises. The sale and/or distribution of drugs and/or alcohol are cause for immediate termination.

Due to the social aspect of school visits, alcohol consumption off ACICS premises is permissible with restrictions and precautions taken to ensure the safety of ACICS employees, guests and team members.

- A. All employees are responsible for full awareness of the federal and local requirements and restrictions concerning the consumption of alcohol.
- B. It is understood that all employees are responsible for their own behavior, and regardless of ACICS policy, individuals must make their own decisions concerning alcohol consumption and take responsibility for any problems they encounter as a result.
- C. ACICS allows moderate consumption of alcohol by team members, guests, and ACICS employees during ACICS sponsored meals. ("Moderate consumption" will usually be interpreted as up to two beverages.)
- D. Other than with meals, alcohol consumption is not acceptable and will not be paid for by ACICS or be considered a reimbursable expense. (See travel policy for reimbursement guidelines).
- E. ACICS staff members who are responsible for the transporting of guests, team members and other staff members are considered to be designated drivers and will abstain from all alcohol before operating a motor vehicle.

Any employee who violates the above guidelines in any way or refuses to cooperate with any aspect of the above guidelines is subject to appropriate disciplinary action up to and including termination.

## 28. WORKPLACE SAFETY

- A. Weapons. ACICS prohibits all who enter the premises, including employees, contractors, temporary employees, patrons, vendors, and visitors from carrying a weapon on ACICS premises or at ACICS events. ACICS reserves the right to search desks, bags, briefcases, purses, and personal workspace for concealed weapons as it does for other prohibited items. Possession of a weapon by an employee, contractor, or temporary employee is considered criminal trespass and is grounds for immediate termination and removal from the premises.

Prohibited weapons include any form of weapon or explosive restricted under local, state or federal regulation. This includes all firearms, illegal knives or other weapons covered by the law. Legal, chemical dispensing devices such as pepper sprays that are sold commercially for personal protection are not covered by this policy. Any questions about what constitutes a weapon will be answered by the Vice President of Administration.

This policy is not intended to create any duty to act by ACICS other than as required by law.

- B. Any threats or implied threats of bodily harm by employees to employees will be taken seriously. Each instance will be investigated and dealt with up to including termination.
- C. Safe Workplace. ACICS strives to maintain a safe workplace for its employees. Employees who sustain work-related injuries must inform their supervisor immediately no matter how minor the injury may appear.

## **29. NO SOLICITATION**

In order to prevent disruptions of our operations and in order to protect employees from harassment and interference with their work, the rules below regarding solicitation and distribution of literature or goods and services on ACICS property must be observed. Violation of these rules will be cause for appropriate discipline or removal from the premises.

### **Employees**

On the ACICS premises, no employee shall solicit/collect funds, distribute literature, or distribute goods and services to another employee or visitor for any purpose including school fundraisers, Girl Scout Cookies, school raffles, personal business, etc. This includes collecting funds for birthday, anniversary, or showers for employees.

### **Non-Employees**

Persons who are not employed by ACICS shall not be permitted to distribute literature or solicit employees or visitors at any time for any purpose inside the ACICS offices.

## **30. INTERNET, E-MAIL, AND COMPUTER USAGE POLICY**

The use of ACICS (*also referred to as "the company" or "company"*) systems, including computers, fax machines, and all forms of Internet/intranet access, is for company business and for authorized purposes only. Brief and occasional personal use of the electronic mail system or the Internet is acceptable as long as it is not excessive or inappropriate and does not result in expense or harm to ACICS or otherwise violate this policy.

Use is defined as "excessive" if it interferes with normal job functions, responsiveness, or the ability to perform daily job activities. Electronic communication should not be used to solicit or sell products or services that are unrelated to the

company's business; distract, intimidate, or harass coworkers or third parties; or disrupt the workplace.

Use of ACICS computers, network, and Internet access is a privilege granted by management and may be revoked at any time for inappropriate conduct carried out on such systems, including, but not limited to:

- Participating in any way in the creation or transmission of unsolicited commercial e-mail ("spam") that is unrelated to legitimate company purposes;
- Engaging in private or personal business activities, including excessive use of instant messaging and chat rooms (see below);
- Accessing networks, servers, drives, folders, or files to which the employee has not been granted access or authorization from someone with the right to make such a grant;
- Making unauthorized copies of ACICS files or other ACICS data;
- Destroying, deleting, erasing, or concealing company files or other company data, or otherwise making such files or data unavailable or inaccessible to the Company or to other authorized users of company systems;
- Misrepresenting oneself or the company;
- Violating the laws and regulations of the United States or any other nation or any state, city, province, or other local jurisdiction in any way;
- Engaging in unlawful or malicious activities;
- Deliberately propagating any virus, worm, Trojan horse, trap-door program code, or other code or file designed to disrupt, disable, impair, or otherwise harm either ACICS's network or systems or those of any other individual or entity;
- Using abusive, profane, threatening, racist, sexist, or otherwise objectionable language in either public or private messages;
- Sending, receiving, or accessing pornographic materials;
- Becoming involved in partisan politics;
- Causing congestion, disruption, disablement, alteration, or impairment of company networks or systems;
- Maintaining, organizing, or participating in non-work-related Web logs ("blogs"), Web journals, "chat rooms", or private/personal/instant messaging;
- Failing to log off any secure, controlled-access computer or other form of electronic data system to which you are assigned, if you leave such computer or system unattended;
- Using recreational games; and/or

- Defeating or attempting to defeat security restrictions on company systems and applications.

Using company systems to access, create, view, transmit, or receive racist, sexist, threatening, or otherwise objectionable or illegal material, defined as any visual, textual, or auditory entity, file, or data, is strictly prohibited. Such material violates the company anti-harassment policies and is subject to disciplinary action. The company's electronic mail system, Internet access, and computer systems must not be used to harm others or to violate the laws and regulations of the United States or any other nation or any state, city, province, or other local jurisdiction in any way. Use of company resources for illegal activity can lead to disciplinary action, up to and including dismissal and criminal prosecution. The company will comply with reasonable requests from law enforcement and regulatory agencies for logs, diaries, archives, or files on individual Internet activities, e-mail use, and/or computer use.

Unless specifically granted in this policy, any non-business use of the company's automation systems is expressly forbidden.

If you violate these policies, you could be subject to disciplinary action, up to and including dismissal.

#### **A. Ownership and Access of Electronic Mail, Internet Access, and Computer Files; No Expectation of Privacy**

ACICS owns the rights to all data and files in any computer, network, or other information system used in the company and to all data and files sent or received using any company system or using the company's access to any computer network, to the extent that such rights are not superseded by applicable laws relating to intellectual property. ACICS also reserves the right to monitor electronic mail messages (including personal/private/instant messaging systems) and their content, as well as any and all use by employees of the Internet and of computer equipment used to create, view, or access e-mail and Internet content. Employees must be aware that the electronic mail messages sent and received using company equipment or company-provided Internet access, including web-based messaging systems used with such systems or access, are not private and are subject to viewing, downloading, inspection, release, and archiving by company officials at all times. ACICS has the right to inspect any and all files stored in private areas of the network or on individual computers or storage media in order to assure compliance with company policies and state and federal laws. No employee may access another employee's computer, computer files, or electronic mail messages without prior authorization from either the employee or an appropriate company official.

ACICS uses software in its electronic information systems that allows monitoring by authorized personnel and that creates and stores copies of any messages, files, or other information that is entered into, received by, sent, or viewed on such systems. Accordingly, employees should assume that whatever they do, type, enter, send, receive, and view on company electronic information systems is electronically stored and subject to inspection, monitoring, evaluation, and company use at any time. Further, employees who use company systems and Internet access to send or receive files or other data that would otherwise be subject to any kind of confidentiality or disclosure privilege thereby waive whatever right they may have to assert such confidentiality or privilege from disclosure. Employees who wish to maintain their right to confidentiality or a disclosure privilege must send or receive

such information using some means other than company systems or the company-provided Internet access.

ACICS has licensed the use of certain commercial software application programs for business purposes. Third parties retain the ownership and distribution rights to such software. No employee may create, use, or distribute copies of such software that are not in compliance with the license agreements for the software. Violation of this policy can lead to disciplinary action, up to and including dismissal.

#### **B. Confidentiality of Electronic Mail**

As noted above, electronic mail is subject at all times to monitoring, and the release of specific information is subject to applicable state and federal laws and company rules, policies, and procedures on confidentiality. Existing rules, policies, and procedures governing the sharing of confidential information also apply to the sharing of information via commercial software. Since there is the possibility that any message could be shared with or without your permission or knowledge, the best rule to follow in the use of electronic mail for non-work-related information is to decide if you would post the information on the office bulletin board with your signature.

It is a violation of company policy for any employee, including system administrators and supervisors, to access electronic mail and computer systems files to satisfy curiosity about the affairs of others, unless such access is directly related to that employee's job duties. Employees found to have engaged in such activities will be subject to disciplinary action.

#### **C. Electronic Mail Tampering**

Electronic mail messages received should not be altered without the sender's permission; nor should electronic mail be altered and forwarded to another user and/or unauthorized attachments be placed on another's electronic mail message.

#### **D. Use of Internet/Intranet Browser(s)**

The Internet is to be used to further the company's mission, to provide effective service of the highest quality to the company's customers and staff, and to support other direct job-related purposes. Supervisors should work with employees to determine the appropriateness of using the Internet for professional activities and career development. The various modes of Internet/Intranet access are company resources and are provided as business tools to employees who may use them for research, professional development, and work-related communications. Limited personal use of Internet resources is a special exception to the general prohibition against the personal use of computer equipment and software.

Employees are individually liable for any and all damages incurred as a result of violating company security policy, copyright, and licensing agreements.

All company policies and procedures apply to employees' conduct on the Internet, especially, but not exclusively, relating to: intellectual property, confidentiality, company information dissemination, standards of conduct, misuse of company resources, anti-harassment, and information and data security.

#### **E. Personal Electronic Equipment**

Employees should not connect personal computers or data storage devices (such as floppy disks, CDs/DVDs, external hard drives, flash drives, iPods, iPhones, or other data storage media) to company electronic systems unless expressly permitted to do so by the IT Department.

#### **F. Use of Social Media by**

While ACICS encourages its employees to enjoy and make good use of their off-duty time, certain activities on the part of employees may become a concern if they have the effect of impairing the work of any employee; harassing, demeaning, or creating a hostile working environment for any employee; disrupting the smooth and orderly flow of work within the office; or harming the goodwill and reputation of the company among its customers or in the community at large. In the area of social media (print, broadcast, digital, and online services such as Facebook, LinkedIn, MySpace, and Twitter, among others), employees may use such media in any way they choose as long as such use does not produce the adverse consequences noted above. For this reason, ACICS reminds its employees that the following guidelines apply in their use of social media, both on and off duty:

1. If an employee publishes any personal information about the employee, another employee of the organization, the company, a client, or a customer in any public medium (print, broadcast, digital, or online) that:
  - a. has the potential or effect of involving the employee, their coworkers, or the company in any kind of dispute or conflict with other employees or third parties;
  - b. interferes with the work of any employee;
  - c. creates a harassing, demeaning, or hostile working environment for any employee;
  - d. disrupts the smooth and orderly flow of work within the office, or the delivery of services to the company's clients or customers;
  - e. harms the goodwill and reputation of the company among its customers or in the community at large; or
  - f. tends to place in doubt the reliability, trustworthiness, or sound judgment of the person who is the subject of the information the employee(s) responsible for such problems will be subject to counseling and/or disciplinary action, up to and potentially including termination of employment, depending upon the severity and repeat nature of the offense.
2. No employee may use company equipment or facilities for furtherance of non-work-related activities or relationships without the express advance permission of [designated member of management].
3. Employees who conduct themselves in such a way that their actions toward and relationships with each other interfere with or damage work relationships, disrupt the flow of work or customer relations, or cause unfavorable publicity in the community, should be concerned that their conduct may be inconsistent with one or more of the above guidelines. In such a situation, the employees involved should request guidance from [designated member of management] to discuss the possibility of a resolution that would avoid such problems. Depending upon the circumstances, failure to seek such guidance may be considered evidence

of intent to conceal a violation of the policy and to hinder an investigation into the matter.

4. Use of social media that involves any kind of criminal activity or harms the rights of others may result in criminal prosecution or civil liability to those harmed, or both.
5. Social media access and use involving company equipment and resources are subject to ACICS's "Internet, E-Mail, and Computer Usage Policy" at all times.

How an employee uses social media is not a matter of concern as long as it is consistent with the above guidelines. Employees may address any questions on this policy to [designated member of management].

Violations of the internet, e-mail, and computer usage policy are subject to discipline up to and including termination.

### **31. CHILDREN IN THE OFFICE**

In order to maintain a professional work environment, employees generally may not bring their children to the office. It is preferred that ACICS employees use leave to stay home with their children when child care is not available. Exceptions to this policy may only be made by the immediate supervisor in consultation with the President.

### **32. PERSONAL CALLS**

Personal telephone calls are to be kept to a minimum. It is recognized that occasionally personal calls are necessary, but rarely should they last more than a few minutes. Personal cell phones are to be placed on mute and used during employee breaks only.

ACICS reserves the right to review the monthly summary of long distance and calling card charges and require employees to reimburse ACICS for all personal telephone use.

### **33. COMPUTER SPEAKERS/RADIO/CD PLAYER USE**

Use of computer speaker, radios, or CD players is a privilege. Speakers, radios, and CD players should be kept at a low volume, and there may be times management requests that radios not be played at all. The playing of music in the office may be pleasing to the employee, but to others the music may be distracting. Consideration of others is paramount.

### **34. PERSONAL USE OF COMPANY PROPERTY**

- A. No employee shall use ACICS property for personal use unless specific permission has been granted by the President. This includes, but is not limited to, computers, laptops, telephones, cellular phones, copiers, faxes, Internet services, printers, cameras, and scanners. Should permission be granted, the employee is responsible for the return and care of the loaned property. Special

care should be taken to identify any concerns regarding its condition before the property is removed and/or used.

- B. If equipment issued to an employee is lost it is the employee's responsibility to pay the insurance policy deductible for replacement of the equipment unless those items are stolen in which case a police report should be filed and a copy forwarded to the IT Manager.

Any charges incurred for personal use of ACICS equipment will be the responsibility of the employee.

- C. Any personal use, transmittal or dissemination of proprietary or confidential information on ACICS-accredited institutions to any outside source is prohibited.

### **35. POSTAGE AND SHIPPING**

Under no circumstances is the ACICS postage meter to be used for personal mail. To offer ACICS reimbursement for personal postage or shipping is not an option. Only official ACICS business correspondence and materials may be mailed or shipped using ACICS funds. Employees may drop stamped personal mail envelopes in the outgoing mail box. ACICS is not liable for any loss of personal mail.

### **36. CONFLICT OF INTEREST**

Employees will act solely in the best interests of ACICS without regard for personal interests. A current, signed Conflict of interest Employee Agreement will be kept on file in employee personnel files.

To ensure ethical and impartial business operation, it is prohibited for ACICS employees to:

- Offer, accept, or solicit money, property, service or other items of value by way of gift, favor, inducement or loan because of the appearance that the offer would influence or the recipient would be influenced by such conduct in the discharge of public duties. The value of any gift accepted must be no more than \$5.
- Use their official position to gain advantage in business, employment, personal matters or any other benefit derived from such relationship.
- Accept honorariums if the employee is being paid by ACICS for the time and travel costs to the event/occasion for which the honorarium will be received.
- Accept gifts, services or amenities over \$5. All gifts, services, or amenities over \$5 coming to ACICS or to individual employees from vendors and/or constituents must be reported to the President, who will treat them as offers to the organization and not to any individual.

### **37. CONFIDENTIAL INFORMATION**

- A. Only the Council Chair, the President or their designee may speak on behalf of ACICS to the media or in answer to public inquiries
- B. No employee shall knowingly dispense such information to any outside party unless authorization has been granted. This could include other employees who do not have the right to know such information. Any breach shall be considered a violation of ACICS policy concerning confidentiality and may be subject to disciplinary action.
- C. Current and former ACICS employees will not use confidential ACICS information or their knowledge of ACICS policies and procedures to secure employment or for their own personal benefit. Such use by current employees will warrant immediate termination and/or legal liability. ACICS may pursue its legal rights and remedies against employees who violate these terms of confidentiality.
- D. Each employee will sign a confidentiality agreement as a condition of employment.

### **38. NON-DISCRIMINATION/PREVENTION OF HARASSMENT**

ACICS is committed to providing a work environment that is free of unlawful discrimination and harassment for all employees and others in the workplace. Violations of this policy will result in appropriate disciplinary action up to and including termination of employment. Under this policy, ACICS may impose disciplinary action, even if the employee's conduct does not rise to the level of behavior necessary to meet the legal definition of unlawful harassment, if ACICS views the conduct as inappropriate and/or disruptive.

**Non-Discrimination:** ACICS is committed to the principles of equal employment opportunity in all terms, conditions, and privileges of employment. We do not discriminate against applicants or employees on the basis of age, race, sex, color, religion, national origin, disability, political affiliation, personal appearance, genetic information, sexual orientation, gender identity or any other status protected by federal, state, or local law. If you believe there has been a violation of this policy, please use the Reporting Policy set forth below.

**Harassment:** Unlawful harassment includes verbal or physical conduct based upon the recipient's age, race, sex, color, religion, national origin, disability, sexual orientation or any other ground prohibited by law that has the purpose or effect of substantially interfering with an individual's work performance or creating an intimidating, hostile or offensive work environment. The anti-harassment policies listed in this handbook apply to all employees (including managers, supervisors and coworkers) and non-employees who affect our workplace (such as visitors, vendors and sub-contractors).

Prohibited conduct includes the following, if taken on one of the bases prohibited by law:

- Comments, slurs, jokes, or remarks that demean, ridicule, or offend;

- Displaying offensive pictures, cartoons, posters, internet sites, or electronic media; and
- Impeding or blocking movement, interference with work or possessions or threats of assault.

If any employee believes there has been a violation of this policy based on any of the protected classes above, the employee should report it using the Reporting Procedure set forth below.

**Sexual Harassment:** It is the policy of ACICS to maintain a working environment free from sexual harassment. Unwelcome sexual advances, request for sexual favors, other verbal, non-verbal or physical conduct of a sexual nature, including sexual jokes and inappropriate touching, displays of sexually suggestive pictures or objects are not permitted. In addition, no supervisor or manager is permitted to make submission to such conduct a basis for employment decisions affecting any employee.

If any employee believes that he or she has experienced or witnessed sexual harassment in the workplace, the employee should report it using the Reporting Procedure set forth below.

**Reporting Procedure:** If an employee believes that he or she has experienced or witnessed a violation of this policy, the employee should report it immediately to the Vice President of Administration or the President. The complaint will be investigated promptly. Investigations will be treated as confidentially as is consistent with conducting a fair and complete investigation. Where the investigation reveals that the complaint has merit, appropriate corrective or disciplinary action will be taken, up to and including termination.

**No Retaliation:** No employee will be retaliated against because they have filed a good faith complaint of illegal harassment under this policy. There will also be no retaliation against any employee because he or she has provided information in any investigation of harassment. Any employee who believes that he or she has been retaliated against for filing a complaint or participating in an investigation should immediately report the retaliation using the Reporting Procedure set forth above.

Allegations of retaliation will be promptly investigated. Any employee (including supervisors and managers) who has been found to have retaliated against an employee in violation of this policy will be subject to disciplinary action.

**Employee Responsibility:** False allegations of harassment could be very detrimental to the individual falsely accused. All employees are expected to act responsibly and use this policy only in good faith.

### 39. COMPLAINT AND GRIEVANCE PROCEDURES

Employees, who feel any situation affecting them is unjust, inequitable, or creates a problem with their ability to perform their job duties should discuss the matter with their supervisor. If the employee feels the matter has not been resolved fairly by the immediate supervisor, then concerns may be described in person, by telephone, or in writing to the supervisor at the next level, to the Vice President of Administration, and to the President, if necessary. It is the policy of ACICS to answer all inquiries of

employees, and the organization will do what it determines is reasonable in order to address complaints concerning fair treatment.

#### **40. WHISTLE-BLOWER PROTECTION**

Any employee, who discloses to his/her supervisor, discloses or threatens to disclose to any public body an act or omission by another ACICS employee that he/she reasonably believes to be a violation of law, rule or regulation will be protected from retaliatory action by ACICS. Any employee may provide information to or testify before any public body conducting an investigation, hearing or inquiry into a violation of law, rule, or regulation without retaliatory action.

A reprimand, discharge, suspension, demotion or denial of promotion or transfer may be considered to be a retaliatory action if taken in response to an employee's exercise of any one of the protected activities, noted above.

To report fraud, waste, abuse or misconduct by an ACICS employee or those doing business with ACICS, please contact the Vice President of Administration. A complaint of a retaliatory action may be filed with any Occupational Safety and Health Administration (OSHA) office or employee within 90 days after an alleged action.

#### **41. WARNING AND TERMINATION PROCEDURES**

- A. ACICS desires at all times to be fair and just in administering disciplinary action. In this vein, supervisors are expected to provide training and guidance to assist employees in improving their job performance and for meeting the performance expectations of ACICS. There will, nevertheless, be times in which disciplinary action and/or termination of employment may be necessary whether due to employee violations of ACICS rules, failure to meet legitimate business expectations, or unacceptable performance.
- B. ACICS may terminate any employee at any time for failure to meet ACICS standards for conduct or performance. ACICS may, but is not required to, use progressive discipline if it believes the employee's conduct or performance can be improved to expected standards. Progressive discipline may be appropriate for:
- Poor work performance, either quality or quantity
  - Minor safety violations
  - Excessive tardiness or absenteeism
  - Abuse or neglect of Council property or equipment
  - Less serious violations of rules of conduct or work rules

Progressive discipline may include the following:

- a verbal warning
- a written warning to a personnel file
- a written warning in personnel file and a suspension of one to three days duration, without pay
- termination of employment

- C. Types of conduct that may result in immediate termination include, but not are not limited to, the following:

- Dishonesty, theft or attempted theft.
  - Assault, fighting, or threatening or abusive conduct.
  - Falsification of records or information, including personnel records.
  - Misappropriation of Council property.
  - Bringing, using, or being under the influence of alcoholic beverages on the job.
  - Use or possession of controlled substances, including the improper use of prescription medication.
  - Possession of a weapon on ACICS property or in the course of performing ACICS business.
  - Insubordination.
  - Violation of the INTERNET, E-MAIL, and COMPUTER USAGE POLICY.
  - Participating in unlawful harassment or discriminatory actions.
  - Job abandonment.
  - Unprofessional conduct which may reflect negatively on the business and reputation of ACICS.
  - Engaging in immoral or indecent conduct while on ACICS premises or while conducting business on behalf of ACICS.
- D. For offenses which, in the view of ACICS merit progressive discipline, any such discipline will be given by the supervisor so that the employee understands the severity of the matter and is able to take corrective action to avert further disciplinary action and/or termination in the future. Written warnings, suspensions and terminations must be approved by the President.
- E. Written warnings will be presented to the employee by the supervisor. A copy is to be given to the employee and a copy signed by supervisor will be retained in the employee's personnel file.

## **42. PERFORMANCE COUNSELING**

Certain expectations of job performance and conduct must be maintained in any work unit. The supervisor's responsibility is to ensure that employees understand these expectations. If it appears that an employee has failed to perform in accordance with these expectations, the supervisor should discuss the matter with the employee to ensure that the employee understands the position requirements and the supervisor's performance expectations. Employees unclear as to their position responsibilities may also review their position description.

Employees who do not meet performance expectations are subject to dismissal.

## **43. TERMINATION AND RESIGNATION**

- A. Any employee who resigns or is terminated during the first six months of their employment for whom ACICS had paid a fee to an employment agency will be required to reimburse ACICS on a pro-rata basis for any amounts not returned by the employment agency.

- B. Termination of employment is a part of personnel activity within any organization. Employment is at will, subject to termination with or without cause. Below are examples of some of the most common circumstances under which employment is terminated:
1. Resignation: Employment termination initiated by an employee who chooses to leave the organization voluntarily. It is expected that the employee will give ACICS at least two weeks notice.
  2. Discharge: Employment termination initiated by ACICS for failure to meet performance or conduct standards. Discharge can be immediately effective.
  3. Layoff: Involuntary employment termination initiated by ACICS for non-disciplinary reasons. ACICS will give the employee at least 2 weeks notice.
  4. Involuntary Terminations/Other: Employment termination initiated by the employee or by ACICS when an employee is unable, for health or other reasons, to continue to perform the essential functions of their position. ACICS will give the employee at least two weeks notice in the event of such terminations.
  5. Retirement/Resignations: Voluntary retirement from active employment status initiated by the employee.
- D. All terminated employees are expected to cooperate with termination procedures. The Vice President of Administration will schedule an exit interview at the time of employment termination. The exit interview will afford an opportunity to discuss such issues as employee benefits and conversion privileges. Suggestions, complaints, and questions may also be voiced.
- E. All credit cards, equipment, keys and other property of ACICS must be returned to ACICS at termination. Any equipment, keys or other property of ACICS that cannot be returned will be replaced at cost to the employee.
- F. Terminated employees will be held financially responsible for all unused transportation purchases that cannot be refunded when canceled and of which the value remains in the former employee's possession.

## **ACKNOWLEDGMENT/RECEIPT**

I have received my copy of the ACICS Staff Handbook. I understand that this handbook is intended as a guide for personnel policies, benefits, and general information and that these guidelines should not be construed as an employment contract.

I understand management reserves the right to make changes in the contents or their application as it deems appropriate, and these changes may be made with or without notice. I also understand that employment is terminable at the will of either myself or the company at any time, and that no representative of the company other than the President has any authority to make any contrary agreement.

**PLEASE SIGN AND RETURN**

This notice acknowledges that you have received and read your January, 2015 staff handbook. Please fill in your name, sign and date this form, and return it to Vice President of Administration within five workdays after you have received your staff handbook. This will confirm that you have received and read your staff handbook.

Printed Name of Employee: \_\_\_\_\_

Signature of Employee: \_\_\_\_\_

Date: \_\_\_\_\_

**ACICS EMPLOYEE AGREEMENT  
CONFLICT OF INTEREST**

**Outside Interest:**

In order to safeguard the activities and assets of the Accrediting Council for Independent Colleges and School (ACICS), employees of ACICS should not have interests in outside businesses which conflict or appear to conflict with their ability to act and make independent decisions in the best interest of ACICS.

An employee is considered to have an interest in an outside business if the employee or any member of his/her immediate family holds any ownership in the business or its property; furnishes goods or services to the business; is a creditor, employee, agent, officer, Vice President, or consultant of the business. Outside businesses include any person, firm, corporation, or government agency that sells or provides a service to, purchases from, or competes with ACICS.

At the time of hire, and periodically thereafter as requested, all employees will be required to complete an Agreement concerning ethical standards of conduct & conflict of interest. Periodic checks will be conducted by ACICS to determine whether changes have occurred; however, all employees are expected to exercise good judgment and discretion in evaluating a particular activity so as to avoid any actual, or apparent, conflict of interest. If there is a doubt, the employee should discuss it with his/her supervisor and/or the Vice President of Administration.

Excluded are investments in the securities of a bank, public utilities, and transportation companies subject to regulations by government authority or a mutual fund or investment company registered under the Investment Company Act. Also excluded are securities listed on a national securities exchange or customarily bought and sold at least once a week in the over-the-counter market or in which the employee and/or his or her family have less than \$10,000 invested, at cost or market value, or hold less than one percent of such outstanding securities.

### **Ethical Standards**

ACICS expects its employees to observe the highest standards of business ethics.

No employee should take any action on behalf of ACICS that they know, or reasonably should know, violates any applicable law or regulation. This obviously includes such activities as bribery, kickbacks, falsehoods, and misrepresentation.

ACICS prohibits all employees from accepting gifts, gratuities, or entertainment from individuals and firms with whom ACICS does business. It is also a violation to give gifts to individuals or firms with whom ACICS does business. Excluded from this prohibition is the exchange of normal business courtesies such as luncheons or dinners, when they are reciprocated or are proper and consistent with regular business practice. Also excluded are advertising or promotional materials and holiday or other gifts, which are of nominal value (less than \$5.00).

Failure to comply with the aforementioned provisions may result in discipline, up to and including termination of employment.

**A. Do you or any member of your immediate family hold any "interest" in an "outside business" in such terms as defined above (check only one)?**

YES     NO

If YES, please describe:

*A plan is in place for the management or elimination of potential conflict of interest:*

**B. Do you have any other relationships that might reasonably be regarded as creating a possible conflict of interest (check only one)?**

YES     NO

If YES, please describe:

*A plan is in place for the management or elimination of potential conflict of interest:*

**C. Have you accepted anything of value, other than what is excluded from this policy, from anyone who does business with ACICS, including independent contractors/evaluators?**

YES     NO

If YES, please describe:

*A plan is in place for the management or elimination of potential conflict of interest:*

**In submitting this form, I affirm that I have read and clearly understand the company policy on Conflict of Interest and that the above information is true and complete to the best of my knowledge; and I also accept responsibility for complying with company policies on Conflict of Interest and assume responsibility for updating this disclosure as necessary. I certify that I have read, understand and will comply with the ACICS position on Conflict of Interest.**

\_\_\_\_\_  
DATE

\_\_\_\_\_  
EMPLOYEE NAME

\_\_\_\_\_  
EMPLOYEE SIGNATURE

## **PHOTO RELEASE FORM**

I hereby grant permission to Accrediting Council for Independent Colleges and Schools (ACICS), to take and use: photographs and/or digital images of me for use in news releases and/or educational materials. These materials might include printed or electronic publications, Web sites or other electronic communications. I further agree that my name and identity may be revealed in descriptive text or commentary in connection with the image(s). I authorize the use of these images without compensation to me. All negatives, prints, and digital reproductions shall be the property of ACICS.

Circle one:

I do grant my permission

I do not grant my permission

\_\_\_\_\_  
*Employee signature*