

**ACCREDITING COUNCIL FOR INDEPENDENT COLLEGES AND SCHOOLS**

**STATEMENT OF FUNCTIONAL EXPENSES**

**FOR THE YEAR ENDED JUNE 30, 2019**

**(WITH COMPARATIVE TOTALS FOR THE YEAR ENDED JUNE 30, 2018)**

	Program Services		Management and General	2019 Total	2018 Total
	Accreditation Expense	Education			
Salaries and Benefits	\$ 532,118	\$ 501,712	\$ 486,508	\$ 1,520,338	\$ 1,976,935
Travel and Meals	1,141,279	-	-	1,141,279	398,409
Depreciation	158,744	149,672	145,137	453,553	495,135
Occupancy	158,039	149,009	144,493	451,541	508,397
Professional Fees	86,961	81,992	79,508	248,461	170,802
Meetings	127,823	120,519	116,866	365,208	227,412
Legal and Accounting	-	-	675,176	675,176	280,349
Recognition Petition	-	-	80,222	80,222	564,809
Interest and Fees	-	-	123,428	123,428	88,935
Payroll Taxes	30,469	28,727	27,857	87,053	110,854
Computer Maintenance and Consulting	125,418	118,251	114,668	358,337	336,112
Utilities	25,427	23,975	23,247	72,649	81,594
Workshops	-	13,806	-	13,806	-
Bad Debt Expense	-	-	104,430	104,430	601,590
Training	10,236	9,651	9,359	29,246	49,626
Office Supplies	1,679	1,583	1,534	4,796	12,577
Equipment Rentals and Maintenance	12,104	11,413	11,067	34,584	48,751
Insurance	49,897	47,046	45,621	142,564	139,835
Miscellaneous	10,456	9,858	9,559	29,873	14,264
Dues and Subscriptions	6,395	6,029	5,847	18,271	6,166
Printing and Postage	2,270	2,141	2,076	6,487	2,996
<b>Totals</b>	<u>\$ 2,479,315</u>	<u>\$ 1,275,384</u>	<u>\$ 2,206,603</u>	<u>\$ 5,961,302</u>	<u>\$ 6,115,548</u>

*See accompanying Notes to Financial Statements.*

**ACCREDITING COUNCIL FOR INDEPENDENT COLLEGES AND SCHOOLS**

**STATEMENT OF CASH FLOWS  
FOR THE YEAR ENDED JUNE 30, 2019  
(WITH COMPARATIVE TOTALS FOR THE YEAR ENDED JUNE 30, 2018)**

	<u>2019</u>	<u>2018</u>
<b>Cash Flows from Operating Activities</b>		
Change in Net Assets	\$ (2,369,847)	\$ (1,458,746)
Adjustments to Reconcile Change in Net Assets to Net Cash Used in Operating Activities		
Depreciation	453,553	495,135
Net Investment Income	(553,784)	(676,291)
Loss on Disposal of Property and Equipment	4,325	-
<u>Decrease (Increase) in Assets</u>		
Accounts Receivable	8,669	88,125
Prepaid Expenses	174,351	1,547
Lease Deposits	(37,056)	-
<u>(Decrease) Increase in Liabilities</u>		
Accounts Payable and Accrued Expenses	(190,860)	(135,852)
Accrued Compensation	(50,667)	(99,129)
Deferred Revenue	(30,680)	13,240
Deferred Rent	-	(13,436)
Net Cash Used in Operating Activities	<u>(2,591,996)</u>	<u>(1,785,407)</u>
<b>Cash Flows from Investing Activities</b>		
Purchases of Investments	(4,862,681)	(2,681,470)
Sales of Investments	6,962,681	4,181,470
Purchases of Furniture and Equipment	<u>(57,188)</u>	<u>(183,608)</u>
Net Cash Provided by Investing Activities	<u>2,042,812</u>	<u>1,316,392</u>
Net Decrease in Cash and Cash Equivalents	<u>(549,184)</u>	<u>(469,015)</u>
Cash and Cash Equivalents, Beginning of Year	<u>694,808</u>	<u>1,163,823</u>
<b>Cash and Cash Equivalents, End of Year</b>	<u><u>\$ 145,624</u></u>	<u><u>\$ 694,808</u></u>

*See accompanying Notes to Financial Statements.*

ACCREDITING COUNCIL FOR INDEPENDENT COLLEGES AND SCHOOLS

NOTES TO FINANCIAL STATEMENTS

JUNE 30, 2019

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**1. ORGANIZATION AND SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES**

Accrediting Council for Independent Colleges and Schools (ACICS) was founded in 1912 to establish and advance the quality of education of independent, non-public career schools, career institutions, and colleges. ACICS accomplishes these objectives by performing the accreditation function for its members.

***Basis of Presentation***

The accompanying financial statements have been prepared on the accrual basis of accounting. Consequently, revenue is recognized when earned and expenses when incurred. Information regarding the financial position and activities of ACICS is classified based on the existence or absence of donor-imposed restrictions. Net assets without donor restrictions are not subject to donor-imposed restrictions or board designations. Net assets with donor restrictions are subject to stipulations imposed by donors or grantors and can be temporary or perpetual in nature. There were no net assets with donor restrictions at June 30, 2019.

***Cash and Cash Equivalents***

ACICS considers all short-term, highly liquid investments with initial maturities of three months or less to be cash equivalents. Since all such cash equivalents are contained in ACICS's investment portfolio and are not used in current operations, they are reported as investments.

***Accounts Receivable***

Accounts receivable includes program related revenue that has not been received as of June 30, 2019. No interest is accrued on receivables. Accounts receivables are reported at their unpaid balances, reduced by an allowance for doubtful accounts, if necessary. As of June 30, 2019, management does not believe doubtful accounts are significant, and no allowance has been reflected in the financial statements. Receivables are considered impaired if full principal payments are not received in accordance with the contractual terms.

Management periodically evaluates the adequacy of the allowance for doubtful accounts by considering ACICS's past receivables loss experience, known and inherent risks in the accounts receivable population, adverse situations that may affect the client's ability to pay, and current economic conditions. The allowance for doubtful accounts is increased by charges to bad debts expense and decreased by charge offs of the accounts receivable balances.

***Investments***

ACICS invests in a professionally managed portfolio. All investments are carried at fair value. Such investments are exposed to various risks such as market and credit. Due to the level of risk associated with such investments, and the level of uncertainty related to changes in the value of such investments, it is at least reasonably possible that changes in risk in the near term could materially affect investment balances and the amounts reported in the financial statements.

Realized and unrealized gains and losses, netted with investment fees, are reported as investment income in the statement of activities and changes in net assets.

ACCREDITING COUNCIL FOR INDEPENDENT COLLEGES AND SCHOOLS

NOTES TO FINANCIAL STATEMENTS

JUNE 30, 2019

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1. ORGANIZATION AND SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (CONTINUED)

*Property and Equipment*

Property and equipment are recorded at cost. All acquisitions in excess of \$1,000 are capitalized. Depreciation is provided on a straight-line basis over the estimated useful lives of the assets. Artwork is not considered a collection and is a non-depreciable asset. Property and equipment are reviewed for impairment whenever changes in circumstances indicate that the carrying amount of an asset may not be recoverable. The cost of property and equipment retired or disposed of is removed from the accounts along with the related accumulated depreciation, and any gain or loss is reflected in income.

*Revenue Recognition*

Sustaining fees are recognized in the year to which they apply. Sustaining fees received in advance are recorded as deferred revenue and are recognized in subsequent periods when they are earned.

User fees are charged to cover the administrative costs of processing forms and are recognized when the forms have been processed.

Substantially all receivables are derived from institutions that ACICS accredits. All receivables to these institutions are made on an unsecured basis. Historically, ACICS has not incurred significant credit related losses.

*Functional Allocation of Expenses*

The costs of providing programs and other activities have been summarized on a functional basis in the statement of activities and changes in net assets. Accordingly, certain costs have been allocated among the program and supporting services benefited. These expenses require allocation on a reasonable basis that is consistently applied. The expenses that are allocated include salaries and benefits, travel and meals, occupancy, and depreciation, among others, which are allocated based on management's estimates of time and effort by employees. Expenses directly identifiable to program or supporting services are presented accordingly.

*Use of Estimates*

The preparation of financial statements in conformity with accounting principles generally accepted in the United States of America requires management to make estimates and assumptions that affect the reported amounts of assets and liabilities and disclosure of contingent assets and liabilities at the date of the financial statements and the reported amounts of revenues and expenses during the reporting period. Actual results could differ from those estimates.

*Prior Year Information*

The financial information as of June 30, 2018, is presented in the statements of financial position, activities and changes in net assets, functional expenses, and cash flows for comparative purposes only and is not intended to represent complete financial statement presentation.

ACCREDITING COUNCIL FOR INDEPENDENT COLLEGES AND SCHOOLS

NOTES TO FINANCIAL STATEMENTS

JUNE 30, 2019

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1. ORGANIZATION AND SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (CONTINUED)

*Reclassification of Prior Year Presentation*

Certain prior year amounts have been reclassified for consistency with the current period presentation. These reclassifications had no effect on net assets or changes in net assets.

*Advertising Costs*

ACICS expenses advertising costs as they are incurred.

*Income Taxes and Uncertainty in Income Taxes*

ACICS is exempt from federal income taxes under Section 501(c)(3) of the Internal Revenue Code as an organization that is not a private foundation. ACICS is, however, subject to income tax on any net profits generated by unrelated business activities as defined under the tax laws. To date, ACICS has not engaged in such activities. As of June 30, 2019, ACICS's information returns filed with the Internal Revenue Service remain open for examination generally for three years after they were filed.

ACICS follows the Financial Accounting Standards Board Accounting Standards Codification (FASB ASC), which provides guidance on accounting for uncertainty in income taxes recognized in an organization's financial statements. The guidance prescribes a recognition threshold and measurement attribute for the financial statement recognition and measurement of a tax position taken or expected to be taken in a tax return, and also provides guidance on derecognition, classification, interest and penalties, accounting in interim periods, disclosure, and transition. Examples of tax positions include the tax-exempt status of ACICS and various positions related to the potential sources of unrelated business taxable income (UBTI). As of June 30, 2019, ACICS had no uncertain tax positions that qualified for either recognition of an unrecognized tax benefit or disclosure in its financial statements.

ACICS's policy is to recognize interest and penalties, if any, on tax positions related to its unrecognized tax benefits in income tax expense in the financial statements. No interest and penalties were assessed or recorded during the year ended June 30, 2019.

*New Accounting Pronouncements*

In February 2016, the FASB issued ASU 2016-02, *Leases (Topic 842)*. The guidance in this ASU supersedes the leasing guidance in *(Topic 840), Leases*. Under the new guidance, lessees are required to recognize lease assets and lease liabilities on the statement of financial position for all leases with terms longer than 12 months. Leases will be classified as either finance or operating, with classification affecting the pattern of expense recognition in the statement of activities and changes in net assets. The new standard is effective for fiscal years beginning after December 15, 2020, including interim periods within those fiscal years. Earlier application is permitted. Management has not evaluated the impact of this ASU on its financial statements.

ACCREDITING COUNCIL FOR INDEPENDENT COLLEGES AND SCHOOLS

NOTES TO FINANCIAL STATEMENTS  
JUNE 30, 2019

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**2. ADOPTION OF ACCOUNTING STANDARDS UPDATE 2016-14**

For the year ended June 30, 2019, ACICS adopted Financial Accounting Standards Board (FASB) Accounting Standards Update (ASU) 2016-14, *Not-for-Profit Entities (Topic 958): Presentation of Financial Statements of Not-for-Profit Entities*. This update addresses the complexity and understandability of net asset classification and provides information about liquidity and availability of resources. The changes required by the update have been applied retrospectively to all periods presented. A key change under ASU 2016-14 is the terminology of net asset classes used in these financial statements. Amounts previously reported as temporarily restricted and permanently net assets, if applicable, are now reported as net assets with donor restrictions. Amounts previously reported as unrestricted net assets are now reported as net assets without donor restrictions. Additionally, ASU 2016-14 requires a presentation of expenses on a functional basis.

**3. LIQUIDITY AND AVAILABLE RESOURCES**

ACICS's cash flows vary from month to month depending on the timing of institutional visit cycles, workshops and meetings, and additions of new schools, campuses, or programs. ACICS manages its assets to meet its financial obligations as they become due. Excess cash flows not needed for day-to-day operations are invested in short-term investments. To meet unanticipated or seasonal needs, ACICS can draw upon its investment reserves as needed.

As of June 30, 2019, the following financial assets and liquidity sources were available for general operating expenditures in the year ending June 30, 2020:

Cash and Cash Equivalents	\$ 145,624
Accounts Receivable, Net	8,536
Investments	<u>9,776,280</u>
Total Financial Assets Available in One Year	<u>\$ 9,930,440</u>

**4. CONCENTRATION OF CREDIT RISK**

ACICS maintains its cash balances at one financial institution in the Washington, D.C., area. The balances are insured by the Federal Deposit Insurance Corporation (FDIC) up to \$250,000. At June 30, 2019, there were no uninsured balances for all cash accounts.

ACICS maintains its investments at one financial institution in the Washington, D.C., area. The cash equivalents and certificates of deposit held at this institution are insured by the FDIC up to \$250,000. At June 30, 2019, the uninsured balance for these cash equivalents and certificates of deposit was approximately \$34,000. All other investments held in this institution are insured by the Securities Investor Protection Corporation (SIPC) for up to \$500,000. At June 30, 2019, the uninsured balance for these investments was approximately \$8,992,000.

**ACCREDITING COUNCIL FOR INDEPENDENT COLLEGES AND SCHOOLS**

**NOTES TO FINANCIAL STATEMENTS  
JUNE 30, 2019**

**5. PROPERTY AND EQUIPMENT**

Property and equipment as of June 30, 2019, consisted of the following:

Furniture and Fixtures	\$ 3,639,879
Artwork	<u>4,006</u>
	3,643,885
Less Accumulated Depreciation and Amortization	<u>(2,706,642)</u>
Net Property and Equipment	<u>\$ 937,243</u>

Depreciation and amortization expense was \$453,553 for the year ended June 30, 2019.

**6. INVESTMENTS AND FAIR VALUE MEASUREMENTS**

ACICS's investments constitute its only assets or liabilities measured at fair value on a recurring basis as of June 30, 2019. These investments and their fair value measurements are summarized below:

	<u>Fair Value</u>	<u>Level 1 Inputs</u>	<u>Level 2 Inputs</u>	<u>Level 3 Inputs</u>
Cash and Short-Term				
Investments	\$ 284,041	\$ 284,041	\$ -	\$ -
Corporate Bonds	2,771,917	-	2,771,917	-
Corporate Bond Mutual Funds	419,585	419,585	-	-
U.S. Equities	3,487,523	3,487,523	-	-
U.S. Equity Mutual Funds	1,552,318	1,552,318	-	-
International Equities	<u>1,260,896</u>	<u>1,260,896</u>	-	-
Totals	<u>\$ 9,776,280</u>	<u>\$ 7,004,363</u>	<u>\$ 2,771,917</u>	<u>\$ -</u>

Accounting principles generally accepted in the United States of America provide a common definition of fair value, establish a framework for measure of fair value and expand disclosures about fair value measurements, but do not require any new fair value measurements.

All assets and liabilities required to be measured at fair value by these accounting principles have been assessed with the following three-tier hierarchy of inputs:

Financial assets measured using Level 1 inputs are based on unadjusted quoted market prices in active markets for identical assets.

Level 2 inputs include quoted prices for similar assets in active markets, quoted prices for identical or similar assets in markets that are not active, inputs other than quoted prices that are observable, and inputs derived from observable market data.

Level 3 inputs, if any, are obtained from ACICS's own assumptions.

**7. COMMITMENTS AND CONTINGENCIES**

ACICS signed a new lease for office space in Washington, D.C., on May 3, 2019. The lease was amended on June 14, 2019, to allow for early occupancy beginning June 17, 2019. The lease includes provisions for rent abatement for the first eight months of the lease and annual rent escalations. Total rental payments under the lease are recognized on a straight-line basis

ACCREDITING COUNCIL FOR INDEPENDENT COLLEGES AND SCHOOLS

NOTES TO FINANCIAL STATEMENTS  
JUNE 30, 2019

7. COMMITMENTS AND CONTINGENCIES (CONTINUED)

in the statement of activities and changes in net assets. Accordingly, there is a liability recorded for deferred rent equal to the difference between the rent expense and the actual cash payments required by the lease. ACICS also leases office equipment. Minimum monthly rent for office space and equipment is currently \$19,934.

The following is a schedule of future minimum lease payments as of June 30, 2019:

For the Years Ending June 30,

2020	\$ 74,112
2021	227,893
2022	233,591
2023	239,430
2024	245,416
Thereafter	<u>167,701</u>
Total	<u>\$ 1,188,143</u>

The total expense incurred under all operating leases during the year ended June 30, 2019, was \$472,607.

ACICS has contracted various consultants and insurance providers. ACICS is obligated to pay fees for these relationships. ACICS has an employment contract with its President expiring on July 30, 2020. In the event of termination, ACICS may be obligated to pay the President up to twelve months base salary.

8. PENSION PLANS

ACICS has a defined contribution pension plan, ACICS retirement/savings plan, as regulated by the Internal Revenue Service Code 401(a). Employees become eligible after one year of service, and become 25% vested for every year of employment. Contributions to the Plan are discretionary and ACICS contributed 5% of eligible employees' salaries. There were no contributions to the Plan for the year ended June 30, 2019. ACICS's employees are also eligible to participate in a 403(b) tax deferred annuity plan through which they can defer a portion of their annual salary. These voluntary contributions immediately vest to the employees.

9. ACCREDITATION AUTHORITY

*Current Accreditation Status*

ACICS continues to be recognized by the U.S. Department of Education as an accrediting agency. On September 28, 2018, the Senior Department Official (SDO) at the U.S. Department of Education recommended that ACICS be granted continued recognition with the condition that it submits a compliance report within 12 months demonstrating full compliance with 34 CFR §§ 602.15(a)(2) and (a)(6). ACICS's status as federally recognized accrediting agency is currently before the Secretary pending a final decision.

ACCREDITING COUNCIL FOR INDEPENDENT COLLEGES AND SCHOOLS

NOTES TO FINANCIAL STATEMENTS  
JUNE 30, 2019

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**9. ACCREDITATION AUTHORITY (CONTINUED)**

*Historical Information on Accreditation Status*

In September 2016, ACICS was notified that the SDO had accepted the recommendation of Department staff and the National Advisory Committee on Institutional Quality and Integrity (NACIQI) to deny the renewal of recognition. ACICS appealed the decision and was notified in December 2016 that the appeal had been denied. ACICS timely filed litigation seeking injunctive and other relief through the courts. On March 23, 2018, the U.S. District Court for the District of Columbia issued a Memorandum Opinion remanding the decision to deny renewal of recognition, resulting in a resubmission of the documents supporting ACICS's petition for re-recognition and the current pending decision before the Secretary.

**10. SUBSEQUENT EVENTS**

ACICS has evaluated subsequent events through December 4, 2019, the date on which the financial statements were available to be issued.



October 9, 2019

VIA E-MAIL

[acicspembrokepines@floridacareercollege.edu](mailto:acicspembrokepines@floridacareercollege.edu)

Mrs. Celeste Blackwell  
Executive Director  
Florida Career College - Pembroke Pines  
7891 Pines Boulevard,  
Pembroke Pines, FL 33024

**Subject: PVP Fraud Check Review**

Dear Mrs. Blackwell:

During its review of your campus's recent PVP data submission which includes a comparison with the ACICS Fraud Check Report, the following issues were identified:

The employer and graduate e-mail address used for PVP verification for graduate, [REDACTED] is the same e-mail address. Please refer to the screenshot below:

Placement Date	ACICS ID	Institution	Upload IP	Graduate IP	Employer IP	Graduate	Employer
October 3, 2019	00018781	Florida Career College - Pembroke Pines 7891 Pines Boulevard, FL	[REDACTED] (10/02/19)	[REDACTED] (10/02/19) warning	[REDACTED] (10/02/19) warning	[REDACTED]	[REDACTED]

1. Therefore, provide a detailed narrative on why the contact employer e-mail address is the same as the graduate's e-mail address..

This response must be received no later than **October 23, 2019**, via [verification@acics.org](mailto:verification@acics.org). The affected placement data will be kept on hold until the Council's subsequent review of your response. I am available via email if you have any questions concerning this request.

Sincerely,

[REDACTED]  
(b)(6)

Michelle Bonocore  
Compliance Analyst



October 16, 2019

Ms. Michelle Bonocore  
Compliance Analyst  
ACICS  
750 First Street, NE, Suite 980  
Washington, DC 20002

**Re: Response to ACICS PVP Inquiry**

Dear Ms. Bonocore,

International Education Corporation (IEC), parent company of Florida Career College (FCC) is in receipt of your October 9, 2019 letter requesting clarification on a PVP submission. In this response we provide a detailed explanation and supporting documentation from the graduate to showcase why the email address for the employer and graduate is accurately reflected as the same email address in the ACICS PVP portal. This response also addresses a data entry issue that was not outlined in the ACICS letter. We describe and resolve the data entry issue within this response as we believe it may have initially contributed the confusion ACICS had on the correlation between the graduate and employer.

It should be noted that under the current ACICS PVP process, if a PVP submission appears to have a discrepancy/conflicting information, ACICS would identify the submission as "invalid". At which point, ACICS permits an institution to appeal directly via the PVP portal and upload an explanation along with supporting documentation via the ACICS PVP portal. This allows an institution to immediately become aware of any concerns and quickly resolve those concerns through the portal.

[Redacted] was enrolled in the Patient Care Technician (PCT) program at the FCC-Pembroke Pines, FL campus August 2018 through July 2019. After graduation, she secured employment as an independent PCT contractor in her field of study. Upon our submission of her placement information via the ACICS PVP process, ACICS did not mark the PVP submission as "Invalid". Rather, ACICS processed and accepted the PVP submission, which is denoted via the text "Verified" in the PVP portal and shown in the screenshot below. We thank the Council for the opportunity to provide an explanation and supporting documentation as we were not previously aware of a concern based on our review of Valerie's PVP status in the ACICS portal.

Submitted For	Graduate Name	Graduate ID	Graduate Cohort	Date Submitted	Employer Name	Placement Date	Program Name	Graduate/Employer Verified	ACICS Verified	Date Reviewed	Contest Results	Remove
Sep, 2019	[Redacted]	354883 <a href="#">CHANGE</a>	06/19 <a href="#">CHANGE</a>	October 3, 2019	[Redacted]	10/03/2019 <a href="#">CHANGE</a>	Patient Care Technician <a href="#">CHANGE</a>	Graduate <input checked="" type="checkbox"/> Employer <input checked="" type="checkbox"/>	<input checked="" type="checkbox"/> Verified	October 4th, 2019		



### **IEC Independent Placement Verification Process**

IEC and FCC takes proactive measures to ensure the accuracy and integrity of FCC placement outcomes. IEC has a placement verification process where 100% of all FCC placements are verified. The verification process is separate from the placement activity at the campus as the verification is conducted by the Corporate Compliance team. The verification process is designed to substantiate a graduate's employment and confirm that it complies with ACICS criteria. Additionally, the independent verification process helps ensure there is no potential conflict of interest.

As part of our verification process, the campus Career Services Specialist (CSS) enters the initial placement into the student database. When the graduate has reached the appropriate employment benchmark, the Corporate Compliance Officer (CO) verifies the employment by contacting employer to complete an Employment Verification form. If the graduate is self-employed, the graduate is contacted to complete Self-Employment Verification form. Completed forms are returned using several different methods. The forms are returned via fax, email, or the CO conducts a site visit to retrieve the completed form. Verification forms document the student's placement information, including graduation date, employment start date, hourly wage, employment status (i.e. full-time or part-time), etc. Once the placement verification is documented on the form, the placement is considered a net placement and is counted as a placement for accreditation purposes and the placement information is also submitted via the ACICS PVP process.

IEC understands the importance of maintaining employment records and diligently works to maintain the accuracy of those records. Historically, the IEC placement verification process including placement documentation has garnered positive feedback from various regulators as well as the community in which our schools conduct training.

### **Employer & Graduate Email Address Is Correct**

On October 1, 2019, the graduate completed a Self-Employment Verification form, which is attached as **Exhibit 1**. As noted in the exhibit, [REDACTED] is self-employed and she entered the name of her client in the "Company Name/Client Name" field on the form. Since the graduate is self-employed, her email accurately matches the email address of the employer (which is herself) on the PVP submission. ACICS has regularly processed and accepted prior PVP submissions where the email address for a self-employed graduate is the same as the employer.

### **Employer Name Data Entry Error and Resolution**

Upon conducting a subsequent review of all original documents received from the graduate in **Exhibit 1**, we have determined there was a data entry error with respect to entering the name of the employer on the PVP submission. On October 3, 2019, we inadvertently listed the name of [REDACTED] client, "[REDACTED]" in the PVP "Employer" field, instead of listing the name "[REDACTED]". We realize that the data entry error on the PVP submission may have contributed to some confusion regarding the employer and the graduate. We take pride in our overall accuracy of PVP data entry submissions to ACICS and recognize this data entry error was an isolated oversight.



Upon discovering the data entry error, we immediately contacted the graduate to obtain clarification and supporting documentation. Under the standard process of resolving PVP data deemed invalid due to conflicting information, we would appeal via the ACICS portal and upload our explanation and supporting documents to resolve issues. However, as the PVP portal shows this PVP was accepted we are unable to upload through the PVP portal and are responding directly to the Council though this correspondence as requested.

Attached as **Exhibit 2** is a confirmation email that we received from the graduate on October 10, 2019. The graduate inserted their responses to our questions, which we highlight in yellow within the exhibit for your quick reference. As noted in the exhibit, the graduate stated that [REDACTED] is one of their clients. The graduate also clarifies further that they began working independently as a PCT in November 2018 and described the services provided to their clients as well as their overall monthly pay rate. We believe this recent documented clarification from the graduate further attests to their self-employment status.

In conclusion, we ask that the Council consider our response and the documentation from the self-employed graduate as evidence that the graduate's email address and employer email address is accurate in being the same email address. Additionally, the documentation provided with this response also resolves the data entry error with respect to the "Employer" name that was entered on the PVP submission. Since the graduate is self-employed, the correct "Employer" name on the PVP submission should be listed as "[REDACTED]". The employer name data entry error was an isolated oversight. Nonetheless, we remain diligent in our ongoing efforts to ensure continued accuracy on all PVP submissions. We are proud of the 100% placement verification process we have in place and are committed to assisting students with achieving their career goals.

Sincerely,

[REDACTED]  
(b)(6)

Angela Paul  
Sr. Director of Regulatory Compliance  
International Education Corporation/  
Florida Career College

# EXHIBIT 1



FLORIDA CAREER COLLEGE



UEI COLLEGE

## SELF-EMPLOYMENT VERIFICATION FORM

**To be completed no less than 60 days after graduation**

*\*If self-employment began after graduation, the form must be completed 60 days after self-employment start date*

Student Name

Student ID:

Date:

10/01/19

Program:

PCT

Graduation Date:

07/10/19

Employment Start Date:

November 10, 2018

### Self-Employment Information:

Company Name / Client Name:

Address:

Telephone:

Email:

Job Title:

PCT

Approximate Monthly Income:

\$ 700

By signing below, I acknowledge and I attest to the following:

- I have been self-employed for at least 60 days.
- This is a sustainable employment and I am making satisfactory progress towards building a client base/professional network in the field.
- My pursuit of self-employment aligns with my employment goals.
- I am earning training related income.

Graduate's Signature

Date

10/01/19

# EXHIBIT 2

**Subject:** FW: Self-Employment Verification

**From:** [REDACTED]

**Sent:** Thursday, October 10, 2019 1:08 PM

**To:** (b)(6)

**Subject:** Re: Self-Employment Verification

[Sent from Yahoo Mail on Android](#)

On Thu, Oct 10, 2019 at 1:57 PM, Rabelo, Dannys [IEC-IO]

(b)(6) wrote:

Good Morning [REDACTED],

Thank you for speaking with me and providing clarification on the attestation in regards your employment. You completed the Patient Care Technician program in July 10<sup>th</sup>, 2019. You have stated that you are working independently with a client/patient for which you provide ADL services. Can you please answer the following questions for further understanding of your current employment?

1. Who is [REDACTED] PATIENT
2. When did you started working independently? NOVEMBER 2018
3. What specific services do you provide for your client(s)/patient(s)? VITAL SIGNS ,DAILY FEEDINGS GIVING INSULIN SHOTS , WALKING HER ETC
4. What is your pay rate?  
\$700 MONTHLY

We really appreciate your time and attention to this matter. I look forward to hearing from you.

## **Dannys Rabelo**

**Regional Associate Director of Regulatory Compliance**

**International Education Corporation**

16485 Laguna Canyon Rd. Ste. 300

Irvine, CA 92618

(561) 282-5480 Tel

(949) 923-6886 Fax

[RabeloD@IECColleges.com](mailto:RabeloD@IECColleges.com)



May 31, 2019

VIA E-MAIL

ACICS ID CODE 00010811(BC)

[presidencia@atlanticu.edu](mailto:presidencia@atlanticu.edu)

Ms. Teresa De Dios-Unanue  
President  
Atlantic University College  
Colton St. # 9  
Guaynabo, PR 00970

**Subject: PVP Fraud Check Review**

Dear Ms. De Dios-Unanue:

During its review of your institution's recent PVP data submission which includes a comparison with the ACICS Fraud Check Report, the following issue was identified:

- Two employers and two Graduates used the same IP address as the individual that submitted the record to the PVP system. See the screenshot below:

Placement Date	ACICS ID	Institution	Upload IP	Graduate IP	Employer IP	Graduate	Employer
January 10, 2019	00010811	Atlantic University College Colton St. # 9, PR	[Redacted] (01/10/19) warning	[Redacted]	[Redacted] (01/11/19) warning	[Redacted]	[Redacted]
July 5, 2018	00010811	Atlantic University College Colton St. # 9, PR	[Redacted] (07/05/18) warning	[Redacted]	[Redacted] (07/05/18) warning	[Redacted]	[Redacted]

Therefore, a detailed response is required for the Council's review and must include the following:

- Narrative on why this employer and graduate would have the same IP address as the location where the placement record was submitted.

This response must be received no later than **June 14, 2019**, via [verification@acics.org](mailto:verification@acics.org). The affected placement data will be kept on hold until the Council's subsequent review of your response. I am available via email if you have any questions concerning this request.

Sincerely,

(b)(6)

Michelle Bonocore  
Compliance Analyst



ATLANTIC  
UNIVERSITY  
COLLEGE

*Oficina de la Presidenta*

June 13, 2019

VIA E-MAIL

Michelle Bonocore  
Compliance Analyst  
Accrediting Council for Independent Colleges and Schools

Subject: PVP Fraud Check Review Response from Atlantic University College

Dear: Michelle Bonocore:

We have received your notification in relation to Atlantic University College (AUC) PVP Fraud Check Report.

AUC conducted an investigation in this regard. During the process, data provided by the offices of Information Technology (IT), Employment Services, Employers and other related offices were analyzed to gain a better understanding of the situation as a whole and to provide a more accurate analysis. These are the findings:

The Creative Director of the company [REDACTED] a highly recognized professional in animation, winner of 2 Emmy Awards, also offers a course to students at AUC.

Mr. [REDACTED] is the Supervisor of the employees at that Company, therefore supervisor of the two students. According to the information provided by the IT Department the Internet Service Provider (ISP) assigns at least two public Internet Protocols (IP) subnets to the Institution. One is for the World Area Network (WAN) of the firewall, and the other one for the Internal Interface. The firewall has a public IP in the network, and this translates between the public and private IP. Therefore, multiple IP addresses will translate, appear and will be identified with the following numbers: [REDACTED] ) and ( [REDACTED] ), because they work as a port forwarding.

This port forwarding is used on each WAN interface using IP address assigned to that interface by the Internet Service Provider Dynamic Host Configuration Protocol server. In AUC the IP address is shared through the same network. This means that every single electronic device connected through the institution network at the campus, will appear under one IP address or the other.

In an interview with Mr. [REDACTED], he confirmed that he had verified both students utilizing his personal equipment while doing educational activities within the Institution using the Campus network.

Therefore, AUC, in order to provide more accurate information on this matter and clarify any misinterpretation of the above, includes the following documents:

- 1) Employment verification of [REDACTED]
- 2) Employment verification of [REDACTED]
- 3) Employment verification of [REDACTED]
- 4) Information Technology Department IP Address Report
- 5) [REDACTED] Certification
- 6) Mr. [REDACTED] Certification
- 7) Employment verification of Mr. [REDACTED] Atlantic University College

Therefore, AUC requests the Council to review and release the hold in both placements. AUC reiterates its commitment to keep the commission informed of all the processes that occur in the institution. For any questions and additional information, you can contact us at: [presidencia@atlanticu.edu](mailto:presidencia@atlanticu.edu).

Cordially,

(b)(6)

Teresa de Dios Unanue  
President



EMPLOYMENT CERTIFICATION

I, [redacted] Lead Coordinator of [redacted] certify that Mr. [redacted] worked in our corporation since [redacted] until [redacted] as a Video Game Designer. He proved to be a hard-working, diligent and responsible employee in all his entrusted tasks.

[redacted] paid the employee an hourly wage of \$ [redacted]. Payments to employees are made in fortnightly period, by check. The company makes deductions and withholdings of salary as required by law.

I issue this Employment Certification, today, Monday, June 10, 2019, in San Juan, Puerto Rico.



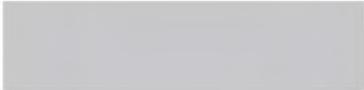


EMPLOYMENT CERTIFICATION

I, [redacted] Lead Coordinator of [redacted] certify that Mr. [redacted] worked in our corporation since [redacted] until [redacted] as a Graphic Designer. He proved to be a hard-working, diligent and responsible employee in all his entrusted tasks.

[redacted] paid the employee an hourly wage of \$ [redacted]. Payments to employees are made in fortnightly period, by check. The company makes deductions and withholdings of salary as required by law.

I issue this Employment Certification, today, Monday, June 10, 2019, in San Juan, Puerto Rico.





EMPLOYMENT CERTIFICATION

I, [redacted] Lead Coordinator at [redacted] certify that Mr. [redacted] has worked in our corporation since [redacted] as Creative Director. Mr. [redacted] has proven to be a hard-working, diligent and responsible in all his entrusted tasks.

GLADIUS pays the employee a monthly salary of \$ [redacted]. The company makes deductions and withholding wages as required by law.

I issue this Employment Certification, today, Monday, June 10, 2019, in San Juan, Puerto Rico.





ATLANTIC  
UNIVERSITY  
COLLEGE

Tuesday, June 11, 2019

To: Dra. Teresa de Dios Unanue

President | Atlantic University College

Dear Dr. de Dios, I hereby allow myself to address you in the most attentive manner to inform of the litigation for the discovery request for the two IP Address ( [REDACTED] / [REDACTED] ). These are assigned from our ISP AT&T and Neptuno Network. One is for the WAN of the firewall, and one for the inside interface. The firewall has the only public IP on the network, and this translated between public IP and private. In this case, the machines "behind" the firewall have private IP addresses, and therefore are not publicly routable.

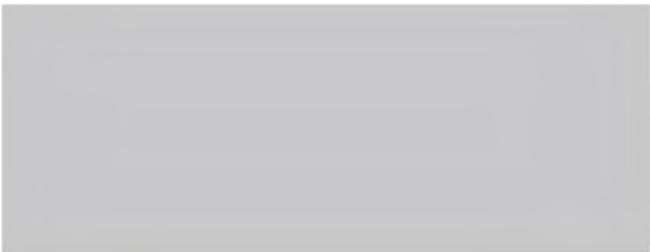
I will await your acceptance and I hope to continue the service directed towards you and Atlantic University College.

Cordially,

[REDACTED]

Coord. of Information Technology and Networks

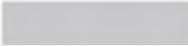
Department of Information Technology and Networking (DITN)



CERTIFICATION

I, [redacted] Lead Coordinator at [redacted] certify that [redacted] with register number [redacted] and EIN number [redacted] is a Limited Liability Company organized on August 25, 2013.

I issue this Certification, today, Monday, June 10, 2019, in San Juan, Puerto Rico.





CERTIFICATION

I, Mr. [REDACTED] certify that I completed the employment verification of the two students, [REDACTED] and [REDACTED] [REDACTED] from my personal computer, while at the facilities of Atlantic University College.

Best Regards,





**ATLANTIC  
UNIVERSITY  
COLLEGE**

June 13, 2019

To whom it may concern:

This letter is to certify that Mr. [REDACTED] offers services at Atlantic University College since August 1, 2016. Mr. [REDACTED] serves as Professor in the Digital Animation Department.

If additional information is required, you may contact at 787 720 1022.

Cordially,

(b)(6)

Viviana Santiago  
Administration Officer



May 31, 2019

VIA E-MAIL

ACICS ID CODE 00022321(BC)

[ACICSHialeah@cbt.edu](mailto:ACICSHialeah@cbt.edu)

Ms. Alexandra Ramirez  
Campus Director  
College of Business & Technology  
935 West 49th Street  
Suite 203  
Hialeah, FL 33012

**Subject: PVP Fraud Check Review**

Dear Ms. Ramirez:

During its review of your institution's recent PVP data submission which includes a comparison with the ACICS Fraud Check Report, the following issues were identified:

- One (1) record used the same IP address for the employer and graduate as the individual that submitted the record to the PVP for graduate [REDACTED]
- The e-mail address used for two (2) graduates, [REDACTED] and [REDACTED] is the same e-mail address used for their employer. See the screenshot below:

Placement Date	ACICS ID	Institution	Upload IP	Graduate IP	Employer IP	Graduate	Employer	Notes
March 5, 2019	00022321	College of Business & Technology 935 West 49th Street, FL	[REDACTED] warning	[REDACTED] warning	[REDACTED] warning	[REDACTED]	[REDACTED]	Need review
June 29, 2018	00022321	College of Business & Technology 935 West 49th Street, FL	[REDACTED]	[REDACTED] warning	[REDACTED] warning	[REDACTED]	[REDACTED]	Need review
March 23, 2018	00022321	College of Business & Technology 935 West 49th Street, FL	[REDACTED]	[REDACTED] warning	[REDACTED] warning	[REDACTED]	[REDACTED]	Need review

Therefore, a detailed response is required for the Council's review and must include the following:

- Narrative on why the employer and graduate would have the same IP address as the location where the placement record was submitted.

Mr. [REDACTED]  
May 31, 2019  
Page 2

- Narrative on why the contact employer e-mail addresses are the same e-mail used for the graduate's contact e-mail.

This response must be received no later than **June 14, 2019**, via [verification@acics.org](mailto:verification@acics.org). The affected placement data will be kept on hold until the Council's subsequent review of your response. I am available via email if you have any questions concerning this request.

Sincerely,

(b)(6)  
[REDACTED]

Michelle Bonocore  
Compliance Analyst

**From:** [Hector Duenas](#)  
**To:** [ACICS Verification](#)  
**Cc:** [Michelle Bonocore](#)  
**Subject:** RE: PVP Fraud e-VIA E-MAIL - ACICS ID Code 00022321(BC) \*\*REVISED\*\*\*  
**Date:** Friday, May 31, 2019 12:28:08 PM  
**Attachments:** [image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)  
[image006.png](#)  
[image007.png](#)  
[image008.png](#)  
[image009.png](#)



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Good morning Ms. Bonocore,  
Thank you for taking my call earlier and answering my questions so I can follow up with this investigation, and provide ACICS with the necessary documentation and explanation for the error made when submitting PVPs for last fiscal reporting period.  
Please find attached the documentation collected by our Career Service Department to support the validity of the placement of the three students in question.

1. [REDACTED] is self-employed, therefore the only email provided was used in the field of the graduate and of the employer
2. In the cases of the other two students: [REDACTED] and [REDACTED] the information was incorrectly input in the PVP template, but find attached the verification of employments we had on record for them both.

Please, let me know if there is any other necessary action on our end, and I will happily comply, or if this suffice the purpose.

Thank you

Hector J. Duenas  
Compliance Manager  
Cutler Bay Campus Director



19151 S. Dixie Highway. Suite 205  
Cutler Bay, FL 33157  
Office Line: 786-693-8844  
Direct Line: 786-693-8813  
CBT Line: Ext. 402

Connect with us:



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**From:** Michelle Bonocore <mbonocore@acics.org>  
**Sent:** Friday, May 31, 2019 10:09 AM  
**To:** ACICS Hialeah <ACICSHialeah@cbt.edu>  
**Cc:** CAR <CAR@ACICS.ORG>  
**Subject:** RE: PVP Fraud e-VIA E-MAIL - ACICS ID Code 00022321(BC) \*\*REVISED\*\*\*

Please find attached revised letter.  
Thank you,

**Michelle Bonocore**  
**Compliance Analyst**  
**Accrediting Council for Independent Colleges and Schools**  
750 First Street, NE | Suite 980 | Washington, DC 20002  
[www.acics.org](http://www.acics.org) | 202.421.5183 - cell |

*Please note new address as of July 1, 2019*  
1350 Eye Street, NW | Suite 560 | Washington, DC 20005  
[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.

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**From:** Michelle Bonocore  
**Sent:** Friday, May 31, 2019 10:06 AM  
**To:** [ACICSHialeah@cbt.edu](mailto:ACICSHialeah@cbt.edu)  
**Cc:** CAR <[CAR@ACICS.ORG](mailto:CAR@ACICS.ORG)>  
**Subject:** PVP Fraud e-VIA E-MAIL - ACICS ID Code 00022321(BC)

Ms. Ramirez:

Attached is a letter regarding PVP information that requires your campus's immediate attention. Please keep this letter in your records, as we will not be sending a hard copy. The Council will retain a copy of the letter for your institution's file. If you have any questions, please contact me.

Thank you,

**Michelle Bonocore**  
**Compliance Analyst**  
**Accrediting Council for Independent Colleges and Schools**  
750 First Street, NE | Suite 980 | Washington, DC 20002



We are committed to your success and to providing you with the best possible job search services. Therefore, we must be aware of your job search efforts, current employment status, and availability.

Student Name: \_\_\_\_\_

Date: January 4, 2019

Program: Diploma

Grad Date: 3/1/2019

Please update your current address and contact information:  Yes, I have recently moved

Address: \_\_\_\_\_

City: \_\_\_\_\_, Zip: \_\_\_\_\_

Home Phone: \_\_\_\_\_

Cell Phone: \_\_\_\_\_

Alternate Contact Number: \_\_\_\_\_

Email Address: \_\_\_\_\_

Resume Completed and e-mailed to Career Services     Resume noted in CVUE

Are you available for:             Full-time             Part-time

Date available for employment: \_\_\_\_\_ Realistic salary range: \_\_\_\_\_

**Transportation:**

Own vehicle             Public Transportation / Ride with others

I authorize my resume and information concerning my academic achievements to be sent to employers and employment agencies that meet my needs as determined by the above information and at the discretion of Career Services in order to help me secure employment. I understand that Career Services may, but will not necessarily, inform me of where my resume has been sent. However, I understand that it is up to me to contact Career Services on a regular basis to discuss my job search needs and progression.

Student Signature: \_\_\_\_\_ Today's Date: \_\_\_\_\_

Are you planning to continue your education in the near future?             Yes             No

If yes, Name of possible school(s): \_\_\_\_\_

I authorize the CBT College to contact and verify my status at the school I attend.

Student Signature: \_\_\_\_\_ Today's Date: \_\_\_\_\_

**AUTHORIZATION TO RELEASE EMPLOYMENT INFORMATION**

I authorize CBT College to contact my employer and verify my employment status. I authorize the use of personal identifying information to verify my employment.

I authorize and attest that CBT College can sign on my behalf of the Student Placement Attestation form.

Student Signature: \_\_\_\_\_ Today's Date: 01/07/19



# CBT College

## STUDENT PLACEMENT INFORMATION SHEET

(Please answer the questions and return to the Placement Department)

Date: January 4, 2019

Student's Name: \_\_\_\_\_ SS#: \_\_\_\_\_

Address: \_\_\_\_\_

City: \_\_\_\_\_ State: FL Zip Code: \_\_\_\_\_

Phone #: \_\_\_\_\_ Fax #: \_\_\_\_\_

Starting Date: \_\_\_\_\_ Expected Graduation Date: 3/1/2019

Program: Air Conditioning and Refrigeration Technician (SPA) Shift: EVE

If you are currently working, please include the following information:

Company: \_\_\_\_\_

Address: \_\_\_\_\_

City: \_\_\_\_\_ State: FL Zip Code: \_\_\_\_\_

Phone#: \_\_\_\_\_ Fax #: \_\_\_\_\_

Position: owner Start Date: 05/15/17

Full-time Part-time Earnings: \$ \_\_\_\_\_ Supervisor: \_\_\_\_\_

\_\_\_\_\_  
Student Signature

01/07/19  
Date

**Cutler Bay Campus**  
19151 South Dixie HWY  
Cutler Bay, FL 33157  
Ph. 305-273-4499 Ext. 400  
Fax: 305-238-2302

**Flagler Campus**  
8230 West Flagler Street  
Miami, FL 33144  
Ph. 305-273-4499 Ext. 200  
Fax: 305-485-4411

**Hialeah Campus**  
935 West 49 St.  
Hialeah, FL 33012  
Ph. 305-273-4499 Ext. 300  
Fax: 305-827-9955

**Miami Gardens Campus**  
5190 NW 167 St.  
Miami Gardens, FL 33014  
Ph. 305-273-4499 Ext. 600  
Fax: 305-270-0779



# CBT College

Begin. Belong. Be More.

## Self-Employment Verification

Graduate Name:	[Redacted]	Date:	[Redacted]
SSN (Last 4 Digits ONLY):	8919	Email Address:	[Redacted]
Program of Study & Grad Date:	DAC	Phone Number:	[Redacted]
Campus:	Haleah	Career Services Representative Name:	[Redacted]

### Employment Information

Company's Name	[Redacted]	Phone Number:	[Redacted]
		Fax Number:	[Redacted]
Address, City, State & Zip	[Redacted]		
Email Address:	[Redacted]		
	[Redacted]		

Start Date of Business		Business License # (Optional)	
5/15/2017			
Job Title / Position	Job Duties		
owner			
Number of Total Clients/Customers (Approx.)	Approximate Monthly Income from Business <u>After</u> Graduation	Date of <u>First</u> Job <u>After</u> Graduation	Number of Jobs/Projects Per Month <u>After</u> Graduation (Approx.)

### Attestations

Initials \_\_\_\_ Self-employment is aligned with my employment goals; it is vocational; based on and related to the education training that I received at CBT.

Initials \_\_\_\_ I am earning training-related income.

Initials \_\_\_\_ I have achieved required licensure for employment.

Please check box if applicable - I am currently concentrating on my own business, utilizing the skills, I obtained at CBT, and do not wish to seek full-time employment in my field of study. I will notify Career Services if assistance is needed in the future.

Graduate's Signature: \_\_\_\_\_ Date: \_\_\_\_\_

### For Office Use Only

Date of Follow-up Call: \_\_\_\_\_ Supporting Documents on file?  YES  No

Career Services Representative: Print \_\_\_\_\_

Career Service Representative: Signature \_\_\_\_\_

DCS Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Comments: \_\_\_\_\_

### Detail by Entity Name

Florida Limited Liability Company  
AUTO AC REPAIR LLC

Filing Information

**Document Number** L17000106682  
**FEI/EIN Number** 82-1600031  
**Date Filed** 05/15/2017  
**State** FL  
**Status** ACTIVE

Principal Address

334 E 21 STREET  
APT. # 4  
HIALEAH, FL 33010

Mailing Address

334 E 21 STREET  
APT. # 4  
HIALEAH, FL 33010

Registered Agent Name & Address

(b)(6)

Authorized Person(s) Detail

**Name & Address**

Title AP

(b)(6)

Annual Reports

Report Year	Filed Date
2018	01/08/2018

Document Images

<a href="#">01/08/2018 -- ANNUAL REPORT</a>	<a href="#">View image in PDF format</a>
<a href="#">05/15/2017 -- Florida Limited Liability</a>	<a href="#">View image in PDF format</a>



# CBT College

Begin. Belong. Be More.

## VERIFICATION OF EMPLOYMENT Electrical Programs

Graduate Name: [REDACTED]	Date:
SSN (Last 4 Digits ONLY): SS #9415	Email Address: [REDACTED]
Program of Study & Grad Date: 9/01/2017 - DEL	Phone Number: [REDACTED]
Campus: CBT College Hialeah Campus	Career Services Representative Name: [REDACTED]

Please complete each section in its entirety do not leave blank fields. Indicate N/A if not applicable

### SECTION I - GENERAL INFORMATION

The following is a list of duties related to the training program. Please check next to the duties that the graduate is responsible for at work.	Graduate's Job Title: X <u>Electrician</u>
	<input checked="" type="checkbox"/> Plan layout and installation of electrical wiring, equipment, or fixtures, based on job specifications and local codes <input checked="" type="checkbox"/> Connect wires to circuit breakers, transformers, or other components, trace out short circuits in wiring, using test meter <input checked="" type="checkbox"/> Test electrical systems or continuity of circuits in electrical wiring, equipment, or fixtures, using testing devices, such as ohmmeters, voltmeters, or oscilloscopes, to ensure compatibility and safety of system <input checked="" type="checkbox"/> Use a variety of tools or equipment, such as power construction equipment, measuring devices, power tools, and testing equipment, such as oscilloscopes, ammeters, or test lamps <input checked="" type="checkbox"/> Measure, cut, and bend wire and conduit, using measuring instruments and hand tools <input type="checkbox"/> Other:
SCHEDULE	Date of Hire / Start Date: X <u>05/07/17</u> # of Hours Worked Per Week: X <u>40</u>

### SECTION II - EMPLOYER INFORMATION

Company's Name	X [REDACTED]	Phone Number:	[REDACTED]
Address, City, State & Zip	X [REDACTED]	Fax Number:	[REDACTED]
Email Address:	X [REDACTED]		
By signing below, I hereby affirm that I am a duly authorized representative to verify the above employment information.			
Signature of Employer's Representative:	X [REDACTED]		
Representative's Name (Please print):	X (b)(6)		
Representative's Job Title:	X <u>Secretary</u>	Date Completed:	X <u>02/24/18</u>

Thank you for taking the time to complete the verification. We appreciate your feedback as an employer partner. Please assist CBT in ensuring that we are preparing our graduates to be the best. We look forward to your responses.

For Verbal Verifications \* (b)(6)

Signature of Career Services Representative: [REDACTED]

Name of Career Services Representative : NOEMI VELAZQUEZ

EMPLOYER VERIFICATION : Verification Date : 2/28/2018

GRADUATE VERIFICATION : Verification Date: \_\_\_\_\_

\* In cases where a school can show diligent efforts have been made to secure such written documentation without success, the school maintains employment verification records that include a) the graduate's and employer's name and contact information, b) a signature of school staff attesting to verbal employment verification with the employer and the graduate, and c) the date(s) of verification are acceptable.

Attach appropriate documentation proving contact to the employers ex emails.



Estamos comprometidos con su éxito y a proveerle con la mejor búsqueda de servicios de trabajo. Por lo tanto debemos estar al tanto de sus esfuerzos en esta búsqueda, actual estado de empleo y disponibilidad.

Nombre del estudiante: \_\_\_\_\_

Fecha: 20 de julio de 2017

Programa: Construction - Diploma

Fecha de graduacion: 9/1/2017

Por favor verifique su dirección postal actual e información de contacto:

Si, me mude recientemente

Calle: \_\_\_\_\_

Ciudad: \_\_\_\_\_ estado y codigo: FL postal: \_\_\_\_\_

Telefono de casa: \_\_\_\_\_ Celular: \_\_\_\_\_

Numero adicional de contacto: \_\_\_\_\_ Correo electrónico: \_\_\_\_\_

Resume completado y enviado a Career Services

Resume en CVUE

Esta usted disponible para: Tiempo completo  Empleo a medio tiempo

Fecha disponible para empleo: \_\_\_\_\_ Rango real de salario: \_\_\_\_\_

**Transportacion**  Vehiculo propio  Transporte público o con otros

### Expectativa para viajar:

¿Cuán lejos está dispuesto a recorrer hasta su trabajo?: \_\_\_\_\_ millas o \_\_\_\_\_ minutos desde casa Desearía ser reubicado \_\_\_\_\_ Si...¿dónde? \_\_\_\_\_

Clases favoritas: \_\_\_\_\_ Instructor favorito \_\_\_\_\_

Acumulado académico actual; \_\_\_\_\_

Autorizo a que mi resume e informacion académica sea enviada a los empleadores y las agencias de empleo que reunan mis necesidades como han sido declaradas en la informacion anterior confiando en que la decision de Career Services me ayudara a encontrar empleo. Entiendo que Career Services podria, pero no necesariamente, informarme del destino de mi resume. Sin embargo, entiendo que es mi responsabilidad contactar Career Services regularmente para discutir mis necesidades y el progreso de las gestiones.

Firma del estudiante: \_\_\_\_\_ Fecha actual: 8/1/17

¿Esta pensando continuar su educacion en el future? SI \_\_\_\_\_ NO

Si su respuesta es SI, mencione la posible escuela(s): \_\_\_\_\_

Autorizo a CBT College a contactar y verificar la escuela que yo asistire.

Firma de estudiante: \_\_\_\_\_ Fecha actual: 8/1/17

¿Trabaja actualmente? SI \_\_\_\_\_ NO \_\_\_\_\_ Si es SI, identifique su empleador y su posicion:

Empleador \_\_\_\_\_ Ciudad \_\_\_\_\_ Teléfono \_\_\_\_\_

Descripcion del trabajo \_\_\_\_\_

Autorizo a CBT College a contactar mi empleador y verificar mi estado de empleo actual. Autorizo el uso de mi informacion personal para dicha verificacion.

Yo autorizo y declaro que CBT College puede firmar en mi lugar el modelo de Declaración de Empleo de Estudiante de ACICS

Firma del estudiante: \_\_\_\_\_ Fecha actual: 8/1/17



# CBT College

## INFORMACION DE EMPLEO

Fecha: 20 de julio de 2017

Fecha de graduación: 9/1/2017

Nombre del estudiante: [Redacted]

Dirección: [Redacted]

Ciudad: [Redacted]

Estado: FL

Código postal: [Redacted]

Teléfono: 786-720-2733

Correo electrónico: [Redacted]

Programa: Construction - Diploma

### EMPLEO

Compañía: [Redacted]

Dirección: [Redacted]

Ciudad: [Redacted] Estado: FL Correo Postal: [Redacted]

Teléfono: [Redacted] Fax: \_\_\_\_\_

Posición: Electricista Fecha de inicio: \_\_\_\_\_

Supervisor: \_\_\_\_\_

Medio Tiempo  Tiempo Completo  Salario \$ \_\_\_\_\_ por hora  anual

[Redacted Signature] 08/01/2017  
Firma del estudiante Fecha

**Cutler Bay Campus**  
19151 South Dixie HWY  
Cutler Bay, FL 33157  
Ph. 305-273-4499 Ext. 400  
Fax: 305-238-2302

**Flagler Campus**  
8230 West Flagler Street  
Miami, FL 33144  
Ph. 305-273-4499 Ext. 200  
Fax: 305-485-4411

**Hialeah Campus**  
935 West 49 St.  
Hialeah, FL 33012  
Ph. 305-273-4499 Ext. 300  
Fax: 305-827-9955

**Miami Gardens Campus**  
5190 NW 167 St.  
Miami Gardens, FL 33014  
Ph. 305-273-4499 Ext. 600  
Fax: 305-270-0779



Estamos comprometidos con su éxito y a proveerle con la mejor búsqueda de servicios de trabajo. Por lo tanto debemos estar al tanto de sus esfuerzos en esta búsqueda, actual estado de empleo y disponibilidad.

Nombre del estudiante: \_\_\_\_\_

Fecha: 05 de junio de 2017

Programa: Construction - Diploma

Fecha de graduación: 6/30/2017

Por favor verifique su dirección postal actual e información de contacto:

Si, me mude recientemente

Calle: \_\_\_\_\_

Ciudad: \_\_\_\_\_ estado y código: FL postal: \_\_\_\_\_

Teléfono de casa: \_\_\_\_\_ Celular: \_\_\_\_\_

Número adicional de contacto: \_\_\_\_\_ Correo electrónico: \_\_\_\_\_

Resume completado y enviado a Career Services

Resume en CVUE

Esta usted disponible para: Tiempo completo \_\_\_\_\_ Empleo a medio tiempo \_\_\_\_\_

Fecha disponible para empleo: \_\_\_\_\_ Rango real de salario: \_\_\_\_\_

Transportación  Vehículo propio  Transporte público o con otros

Expectativa para viajar:

¿Cuán lejos está dispuesto a recorrer hasta su trabajo?: \_\_\_\_\_ millas o \_\_\_\_\_ minutos desde casa Desearía ser reubicado \_\_\_\_\_ Si...¿dónde? \_\_\_\_\_

Clases favoritas: \_\_\_\_\_ Instructor favorito \_\_\_\_\_

Acumulado académico actual: \_\_\_\_\_

Autorizo a que mi resume e información académica sea enviada a los empleadores y las agencias de empleo que reúnan mis necesidades como han sido declaradas en la información anterior confiando en que la decisión de Career Services me ayudara a encontrar empleo. Entiendo que Career Services podría, pero no necesariamente, informarme del destino de mi resume. Sin embargo, entiendo que es mi responsabilidad contactar Career-Services regularmente para discutir mis necesidades y el progreso de las gestiones.

Firma del estudiante: \_\_\_\_\_ Fecha actual: 06/13/17

¿Esta pensando continuar su educación en el future? SI \_\_\_\_\_ NO X

Si su respuesta es SI, mencione la posible escuela(s): \_\_\_\_\_

Autorizo a CBT College a contactar y verificar la escuela que yo asistire.

Firma de estudiante: \_\_\_\_\_ Fecha actual: 06/13/17

¿Trabaja actualmente? SI No Si es SI, identifique su empleador y su posición:

Empleador \_\_\_\_\_ Ciudad \_\_\_\_\_ Teléfono \_\_\_\_\_ Descripción del trabajo \_\_\_\_\_

Autorizo a CBT College a contactar mi empleador y verificar mi estado de empleo actual. Autorizo el uso de mi información personal para dicha verificación.

Yo autorizo y declaro que CBT College puede firmar en mi lugar el modelo de Declaración de Empleo de Estudiante de ACICS

Firma del estudiante: \_\_\_\_\_ Fecha actual: 06/13/17



# CBT College

## INFORMACION DE EMPLEO

Fecha: 05 de junio de 2017

Fecha de graduación: 6/30/2017

Nombre del estudiante: [Redacted]

Dirección: [Redacted]

Ciudad: [Redacted]

Estado: FL

Código postal: [Redacted]

Teléfono: [Redacted]

Correo electrónico: \_\_\_\_\_

Programa: Construction - Diploma

### EMPLEO

Compañía: [Redacted]

Dirección: [Redacted]

Ciudad: [Redacted]

Estado: FL

Correo Postal: \_\_\_\_\_

Teléfono: [Redacted]

Fax: \_\_\_\_\_

Posición: Electricista

Fecha de inicio: 08-2016

Supervisor: [Redacted]

Medio Tiempo  Tiempo Completo

Salario \$ \_\_\_\_\_ por hora  anual

[Redacted Signature]

Firma del estudiante

06/13/17

Fecha

**Cutler Bay Campus**  
19151 South Dixie HWY  
Cutler Bay, FL 33157  
Ph. 305-273-4499 Ext. 400  
Fax: 305-238-2302

**Flagler Campus**  
8230 West Flagler Street  
Miami, FL 33144  
Ph. 305-273-4499 Ext. 200  
Fax: 305-485-4411

**Hialeah Campus**  
935 West 49 St.  
Hialeah, FL 33012  
Ph. 305-273-4499 Ext. 300  
Fax: 305-827-9955

**Miami Gardens Campus**  
5190 NW 167 St.  
Miami Gardens, FL 33014  
Ph. 305-273-4499 Ext. 600  
Fax: 305-270-0779



# CBT College

## VERIFICATION OF EMPLOYMENT

Date: 9/26/17

James Duran  
935 W 49<sup>th</sup> ST Suite 203 Hialeah, FL 33012  
Phone: (786) 693-8803  
Fax: (786) 433-8581  
E-mail: [james.duran@cbt.edu](mailto:james.duran@cbt.edu)

Grad Date 6/30/17

Please complete each section in its entirety do not leave blank fields. Indicate N/A if not applicable

### SECTION I - GENERAL INFORMATION

Name of Employee \_\_\_\_\_ Social Security Number 6297  
(Last 4 digits only)

Current Job Title Electrician Number of Hours Worked Per Week 40 Rate of pay \$ \_\_\_\_\_ per Hour, Week, Month, Year (please circle one)

How often is/was the employee paid? \_\_\_\_\_ Day \_\_\_\_\_ Week  Bi-Weekly \_\_\_\_\_ Monthly

Other \_\_\_\_\_ Does/did employee receive tips? \_\_\_ Yes  No If yes, what is the average weekly amount? \$ \_\_\_\_\_  
Explain - For example: Commission, Per Assignment, etc.

Current employment start date 8/15/16 Hire date (if different from the start date) \_\_\_\_\_

Is the person currently employed?  Yes \_\_\_ No If no, provide employment end date \_\_\_\_\_ Is/was the employee covered by health insurance? \_\_\_ Yes \_\_\_ No

### SECTION II - EMPLOYER INFORMATION

Company's Name \_\_\_\_\_ Address \_\_\_\_\_

Telephone Number \_\_\_\_\_ Fax Number \_\_\_\_\_ E-Mail Address \_\_\_\_\_

By \_\_\_\_\_ that I am a duly authorized representative to verify the above employment information.

(b)(6) \_\_\_\_\_ Representative's Name (Please Print) \_\_\_\_\_

\_\_\_\_\_ Date Completed 8/17/17

### For Office Use Only

Date of Follow-up Call: \_\_\_\_\_  Phone  Fax  In person  E-mail

Career Services Advisor: (PRINT) James Duran

Career Service Advisor signature \_\_\_\_\_

Comments: \_\_\_\_\_



May 31, 2019

VIA E-MAIL

ACICS ID CODE# 00010937(BC)

[acicsrolla@metrobusinesscollege.edu](mailto:acicsrolla@metrobusinesscollege.edu)

Ms Mary Elizabeth Gapsch  
Director  
Metro Business College  
1202 East Highway 72,  
Rolla, MO 65401

**Subject: PVP Fraud Check Review**

Dear Ms. Gapsch:

During its review of your institution's recent PVP data submission which includes a comparison with the ACICS Fraud Check Report, the following issues were identified:

- One (1) record used the same IP address for the employer and graduate as the individual that submitted the record to the PVP for graduate [redacted] See the screenshot below:

Placement Date	ACICS ID	Institution	Upload IP	Graduate IP	Employer IP	Graduate	Employer
January 21, 2019	00010937	Metro Business College 1202 East Highway 72, MO	[redacted] (01/21/19) warning	[redacted] (01/22/19)	[redacted] (01/22/19) warning	[redacted]	[redacted]

Therefore, a detailed response is required for the Council's review and must include the following:

- Narrative on why this employer and graduate would have the same IP address as the location where the placement record was submitted.

This response must be received no later than **June 14, 2019**, via [verification@acics.org](mailto:verification@acics.org). The affected placement data will be kept on hold until the Council's subsequent review of your response. I am available via email if you have any questions concerning this request.

Sincerely,

(b)(6)  
[Redacted signature box]

Michelle Bonocore  
Compliance Analyst

**From:** [Mary](#)  
**To:** [ACICS Verification](#)  
**Subject:** PVP Fraud Check Review  
**Date:** Friday, May 31, 2019 10:18:35 AM

---

The reason the IP address is the same for the Employer and the upload is because [REDACTED] is the employer and he also works for Metro Business College. He hired one of his students as a massage therapists. He more than likely responded to your email for placement verification from Metro Business College.

--

Mary Gapsch  
Director  
1202 E. Hwy. 72  
Rolla, MO 65401  
Metro Business College  
573-364-8464

New Start January 2, 2019!

Are you career ready? Try our career readiness quiz [metro-cr.4.virtualadviser.com](http://metro-cr.4.virtualadviser.com)

[www.metrobusinesscollege.edu/disclosures](http://www.metrobusinesscollege.edu/disclosures)

If you no longer wish to receive emails from Metro Business College, reply to this email with 'Unsubscribe' in the subject line.

**From:** [Michelle Bonocore](#) on behalf of [ACICS Verification](#)  
**To:** [Mary](#)  
**Subject:** RE: PVP Fraud Check Review  
**Date:** Friday, May 31, 2019 12:04:00 PM

---

Thank you,  
That would clear up the issue.

Michelle Bonocore  
Compliance Analyst  
Accrediting Council for Independent Colleges and Schools  
750 First Street, NE | Suite 980 | Washington, DC 20002  
[www.acics.org](http://www.acics.org) | 202.421.5183 - cell |

Please note new address as of July 1, 2019  
1350 Eye Street, NW | Suite 560 | Washington, DC 20005  
[www.acics.org](http://www.acics.org) | 202.336.6780 – p | 202.842.2593 – f

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

From: Mary <[maryg@metrobusinesscollege.edu](mailto:maryg@metrobusinesscollege.edu)>  
Sent: Friday, May 31, 2019 10:32 AM  
To: ACICS Verification <[verification@acics.org](mailto:verification@acics.org)>  
Subject: PVP Fraud Check Review

The reason the IP address is the same for the Employer and the upload is because [REDACTED] is the employer and he also works for Metro Business College. He hired one of his students as a massage therapists. He more than likely responded to your email for placement verification from Metro Business College.

--

Mary Gapsch  
Director  
1202 E. Hwy. 72  
Rolla, MO 65401  
Metro Business College  
573-364-8464

New Start January 2, 2019!

Are you career ready? Try our career readiness quiz [metro-cr.4.virtualadviser.com](http://metro-cr.4.virtualadviser.com)

[www.metrobusinesscollege.edu/disclosures](http://www.metrobusinesscollege.edu/disclosures)

If you no longer wish to receive emails from Metro Business College, reply to this email with 'Unsubscribe' in the subject line.



May 31, 2019

VIA E-MAIL

ACICS ID CODE# 00048177(MC)

[compliance@sanignaciouniversity.edu](mailto:compliance@sanignaciouniversity.edu)

Mr. Federico Martinez  
President  
San Ignacio University  
10395 NW 4 Street, Suite 125  
Doral, Florida 33178

**Subject: PVP Fraud Check Review**

Dear Mr. Martinez:

During its review of your institution’s recent PVP data submission which includes a comparison with the ACICS Fraud Check Report, the following issues were identified:

- One (1) record used the same IP address for the employer and graduate as the individual that submitted the record to the PVP for graduate [REDACTED] See the screenshot below:

Placement Date	ACICS ID	Institution	Upload IP	Graduate IP	Employer IP	Graduate	Employer	Notes	View	Archive
April 22, 2019	00048177	San Ignacio University 10395 NW 41ST STREET SUITE 125, FL	[REDACTED] (04/22/19)	[REDACTED] (04/22/19) warning	[REDACTED] (04/22/19) warning	[REDACTED]	[REDACTED]	need review		

Therefore, a detailed response is required for the Council’s review and must include the following:

- Narrative on why this employer and graduate would have the same IP address as the location where the placement record was submitted.

This response must be received no later than **June 14, 2019**, via [verification@acics.org](mailto:verification@acics.org). The affected placement data will be kept on hold until the Council’s subsequent review of your response. I am available via email if you have any questions concerning this request.

Sincerely,

(b)(6)  
[Redacted signature box]

Michelle Bonocore  
Compliance Analyst



**ACICS ID CODE# 00048177**

June 03, 2019

Ms. Michelle Bonocore  
ACICS Compliance Analyst  
750 First Street, NE Suite 980  
Washington, DC 20002-4223

**Subject: PVP Fraud Check Review**

Dear Ms. Bonocore;

In response to your communication dated May 31, 2019; the reason the employer and graduate IP address were the same, was due to an error in populating the PVP data. The correct employer ID address is [REDACTED].

I attach as well the Placement letter form with the information provided by the student in question.

Do not hesitate to contact us, if further information is needed.

(b)(6)  
[REDACTED]

Gisselle Bermúdez  
Student Services Senior Coordinator

**Current Placement Information**

Name & Last Name: [Redacted] Phone: [Redacted]  
Program: MBA Int. Business Email: [Redacted]  
Date: 04/2019

Choose your status:

- Domestic
- International

If **domestic**, please provide us with the following details of your employment status:

Are you currently employed?

- Yes
- No

If **employed**, please provide us with the following details on your current placement:

Name of Company: [Redacted]  
Position: Office Administrator / Billing Specialist  
Job Description: Billing of business inside USA territory, accounts receivable

Start Date: 01/2016 Working Hours: 40

Point of Contact Name: [Redacted]  
Point of Contact Phone: [Redacted]  
Point of Contact Email: [Redacted]

I, [Redacted], am aware that the information provided will be used and kept for accreditation purposes and hereby authorize San Ignacio University to contact my current and future employers for further information.

Student ID: [Redacted]

[Redacted Signature]

Student Signature



May 6, 2019

VIA E-MAIL

[bau@bau.edu](mailto:bau@bau.edu)

Sinem Vatanartiran  
President  
Bay Atlantic University  
1510 H Street N.W, Suite #400  
Washington, DC 20005

**Subject: PVP Fraud Check Review**

Dear Ms. Vatanartiran:

During its review of your institution's recent PVP data submission which includes a comparison with the ACICS Fraud Check Report, the following issue was identified:

- Employer, [REDACTED] and Graduate, [REDACTED] used the same IP address as the individual that submitted the record to the PVP system. See the screenshot below:

Placement Date	ACICS ID	Institution	Upload IP	Graduate IP	Employer IP	Graduate	Employer
March 13, 2019	00275488	BAU International University 1510 H Street N.W, DC	(03/13/19) warning	(03/13/19) warning	(03/13/19) warning	[REDACTED]	[REDACTED]

Therefore, a detailed response is required for the Council's review and must include the following:

- Narrative on why this employer and graduate would have the same IP address as the location where the placement record was submitted.

This response must be received no later than **May 13, 2019**, via [verification@acics.org](mailto:verification@acics.org). The affected placement data will be kept on hold until the Council's subsequent review of your response. I am available via email if you have any questions concerning this request.

(b)(6)

Michelle Bonocore  
Compliance Analyst

**From:** [Michelle Bonocore](#)  
**To:** [BAU](#)  
**Subject:** RE: BAU -PVP Fraud Check- ID# 000275488  
**Date:** Monday, May 6, 2019 3:54:00 PM

---

Unfortunately I will not be present at the conference.  
I will be there in spirit!

**Michelle Bonocore**  
Compliance Analyst  
Accrediting Council for Independent Colleges and Schools  
750 First Street, NE | Suite 980 | Washington, DC 20002  
[www.acics.org](http://www.acics.org) | 202.421.5183 - cell |

**MARK YOUR CALENDAR for the ACICS Professional Development Conference and Annual Meeting “Ensuring Quality through Transparency and Accountability” to be held at the Hyatt Regency Crystal City, VA Wednesday, May 8, 2019 – Friday, May 10, 2019.**

**[Click here for information and registration details!](#)**

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---

**From:** BAU <bau@bau.edu>  
**Sent:** Monday, May 06, 2019 3:24 PM  
**To:** Michelle Bonocore <mbonocore@acics.org>  
**Cc:** CAR <CAR@ACICS.ORG>; Perliter Walters-Gilliam <PWGilliam@acics.org>  
**Subject:** Re: BAU -PVP Fraud Check- ID# 000275488

You are welcome,

Looking forward to seeing you at the ACICS conference.

Best,

Sinem

On May 6, 2019, at 15:06, Michelle Bonocore <[mbonocore@acics.org](mailto:mbonocore@acics.org)> wrote:

Hello Simen,

I am receipt of your response, which will be sufficient to address the letter.  
Thank you for the timely response!

**Michelle Bonocore**  
**Compliance Analyst**  
**Accrediting Council for Independent Colleges and Schools**  
750 First Street, NE | Suite 980 | Washington, DC 20002  
[www.acics.org](http://www.acics.org) | 202.421.5183 - cell |

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---

**From:** BAU <[bau@bau.edu](mailto:bau@bau.edu)>  
**Sent:** Monday, May 06, 2019 3:00 PM  
**To:** Michelle Bonocore <[mbonocore@acics.org](mailto:mbonocore@acics.org)>  
**Cc:** CAR <[CAR@ACICS.ORG](mailto:CAR@ACICS.ORG)>; Perliter Walters-Gilliam <[PWGilliam@acics.org](mailto:PWGilliam@acics.org)>  
**Subject:** Re: BAU -PVP Fraud Check- ID# 000275488

Hi Michelle,

██████████ is our own establishment. That is why the IP address is the same. It is the Housing Apartments for our students and the owner is ██████████ We use the same internet cabling and the same wi-fi system, and the Director is appointed by us.

She was our student and we hired her.

What do you recommend that we do? How do we proceed?

Sinem

On May 6, 2019, at 14:46, Michelle Bonocore <[mbonocore@acics.org](mailto:mbonocore@acics.org)> wrote:

May 6, 2019

Via e-mail

Attached is your Council action letter with the results of the PVP Fraud Check review. Please keep this letter in your records, as we will not be sending a hard copy. The Council will retain a copy of the letter for your institution's file. If you have any questions, please contact the ACICS staff member listed in the last paragraph of the letter.

Thank you.

**Michelle Bonocore**

**Compliance Analyst**

**Accrediting Council for Independent Colleges and Schools**

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

[www.acics.org](http://www.acics.org) | 202.421.5183 - cell |

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<000275488-Fraud Check Email - BAU.pdf>

# Chronology of Review – Fairfax University of America

## Re. SCHEV Action

<b>Date</b>	<b>Action</b>
<b>February 11, 2019</b>	Formal Communication of Audit Report to ACICS from SCHEV
<b>February 12, 2019</b>	Email/Telephone Communication with SCHEV staff on Report Follow up with ACICS leadership and legal counsel
<b>March 15, 2019</b>	Outreach to SCHEV staff to follow up
<b>March 18, 2019</b>	Conversation with SCHEV staff before the Council's meeting
<b>March 21, 2019</b>	Follow up conversation with SCHEV staff on the Council's decision to move ahead with revocation proceedings
	ARIG briefing and formulation of recommendation to the Executive Committee of ACICS
	Executive Committee Review and Action
<b>March 22, 2019</b>	Institutional Show-Cause Directive Letter sent to Institution and all state and federal agencies
<b>May 8, 2019</b>	In-person hearing at the Council's May Annual Meeting
<b>May 10, 2019</b>	Communication to institution on Continued Show-Cause action
<b>August 8, 2019</b>	Show-cause directive vacated and request information on teach-out of the Distance Education modality
<b>December 13, 2019</b>	Acknowledgement of Receipt of Requested Information sent to the institution – institution advised of ongoing compliance expectations
<b>February 4, 2020</b>	ACICS receives a copy of SCHEV's limited scope audit visit, conducted January 28-29, 2020
<b>April 7, 2020</b>	FXUA provided a copy of its response to SCHEV's audit report
<b>April 27, 2020</b>	Telephone conversation with SCHEV to discuss institution's response and consideration before its Council
<b>May 1, 2020</b>	Communication from SCHEV that FXUA will not be on its May agenda; it will be on the July agenda
<b>May 8, 2020</b>	Council discusses the institution's response and its continued commitment to cooperate with SCHEV.

## Perlter Walters-Gilliam

---

**From:** Rosa-Casanova, Sylvia <sylviarosacasanova@schev.edu>  
**Sent:** Friday, May 1, 2020 8:39 AM  
**To:** Perlter Walters-Gilliam  
**Subject:** Re: FW: FXUA's Response to Report of 2020 Limited Audit by SCHEV

Perlter,

I just wanted you to know that FXUA will not be on the Council meeting in May. The Director of Academic Affairs (Joe DeFilippo), said that presenting this at the May meeting will be too long and complicated and Council already has all the actionable items from March to vote on and some additional actionable items that need to be on the May Agenda. He says it will be on the July Agenda.

Sylvia Rosa-Casanova  
Director, Private Postsecondary Education  
State Council of Higher Education for Virginia (SCHEV)  
101 N. 14th Street  
Richmond VA 23219  
(P) 804-225-3399 (C) 804-592-8772  
(F) 804-225-2604

*Amid the coronavirus outbreak, SCHEV is exercising caution to protect employees and the public. We are primarily communicating via email, telephone or video conference. Please be safe, be informed and be well.*

## Perlter Walters-Gilliam

---

**From:** Perlter Walters-Gilliam  
**Sent:** Monday, April 27, 2020 11:24 AM  
**To:** sylviarosacasanova@schev.edu  
**Subject:** Accepted: Invitation: Perlter and SRC phone call @ Mon Apr 27, 2020 11:30am - 12pm (EDT) (pwgilliam@acics.org)

## Perlter Walters-Gilliam

---

**From:** Rosa-Casanova, Sylvia <sylviarosacasanova@schev.edu>  
**Sent:** Monday, April 27, 2020 7:49 AM  
**To:** Perlter Walters-Gilliam  
**Subject:** Re: FW: FXUA's Response to Report of 2020 Limited Audit by SCHEV

I'd love to talk with you today. I have a meeting at 9 and one at 10. After that I am free.

Sylvia Rosa-Casanova  
Director, Private Postsecondary Education  
State Council of Higher Education for Virginia (SCHEV)  
101 N. 14th Street  
Richmond VA 23219  
(P) 804-225-3399 (C) 804-592-8772  
(F) 804-225-2604

*Amid the coronavirus outbreak, SCHEV is exercising caution to protect employees and the public. We are primarily communicating via email, telephone or video conference. Please be safe, be informed and be well.*

On Mon, Apr 27, 2020 at 7:45 AM Perlter Walters-Gilliam <[PWGilliam@acics.org](mailto:PWGilliam@acics.org)> wrote:

Good morning Sylvia

I trust you and the family are staying safe during these unprecedented times. How is your grandbaby doing – already 3 months! I wanted to touch base with you concerning SCHEV's review of FXUA's response...below...let me know if you have time to connect on the phone later today.

Thanks!

(b)(6)

**Vice President of Accreditation**

**Accrediting Council for Independent Colleges and Schools**

**1350 Eye Street, NW | Suite 560 | Washington, DC 20005**

**[www.acics.org](http://www.acics.org) | 202.336-6769 - P |**

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---

**From:** Perliter Walters-Gilliam

**Sent:** Thursday, April 9, 2020 7:39 AM

**To:** Kevin Martin <[kevin@fxua.edu](mailto:kevin@fxua.edu)>; Michelle Edwards <[medwards@acics.org](mailto:medwards@acics.org)>

**Cc:** Compliance <[compliance@cea-accredit.org](mailto:compliance@cea-accredit.org)>; Ahmed Alwani <[aalwani@fxua.edu](mailto:aalwani@fxua.edu)>; FXUA Office of Institutional Effectiveness <[oi@fxua.edu](mailto:oi@fxua.edu)>; Chap Petersen <[jcp@petersenfirm.com](mailto:jcp@petersenfirm.com)>; Sandra Luevano <[sl@petersenfirm.com](mailto:sl@petersenfirm.com)>; NS Hasan <[nshasan@fxua.edu](mailto:nshasan@fxua.edu)>

**Subject:** RE: FXUA's Response to Report of 2020 Limited Audit by SCHEV

Good morning Dr. Martin

This confirms receipt of your response. If additional information or clarification is required, we will let you know.

Stay safe.

(b)(6)

**Vice President of Accreditation**

**Accrediting Council for Independent Colleges and Schools**

**1350 Eye Street, NW | Suite 560 | Washington, DC 20005**

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**From:** Kevin Martin <[kevin@fxua.edu](mailto:kevin@fxua.edu)>

**Sent:** Tuesday, April 7, 2020 5:41 PM

**To:** Michelle Edwards <[medwards@acics.org](mailto:medwards@acics.org)>; Perliter Walters-Gilliam <[PWGilliam@acics.org](mailto:PWGilliam@acics.org)>

**Cc:** Compliance <[compliance@cea-accredit.org](mailto:compliance@cea-accredit.org)>; Ahmed Alwani <[aalwani@fxua.edu](mailto:aalwani@fxua.edu)>; FXUA Office of Institutional Effectiveness <[oie@fxua.edu](mailto:oie@fxua.edu)>; Chap Petersen <[jcp@petersenfirm.com](mailto:jcp@petersenfirm.com)>; Sandra Luevano <[sl@petersenfirm.com](mailto:sl@petersenfirm.com)>; Kevin Martin <[kevin@fxua.edu](mailto:kevin@fxua.edu)>; NS Hasan <[nshasan@fxua.edu](mailto:nshasan@fxua.edu)>

**Subject:** FW: FXUA's Response to Report of 2020 Limited Audit by SCHEV

Dear Ms. Edwards and Ms. Walters-Gilliam,

Please find attached a copy of our response to SCHEV's recent audit. Our response includes a copy of the findings from SCHEV in Exhibit 1. If you are unable to access the link below, please let me know.

If you require a physical copy of our response, please let me know.

As always, please let me know if there are any questions.

**Kevin J. Martin, Ph.D.**

**Director of Institutional Effectiveness**

**Dean, School of Language Studies**

**Fairfax University of America**

[www.fxua.edu](http://www.fxua.edu)

4401 Village Drive

Fairfax, VA 22030

Tel: (703) 865-8736

Fax: (703) 591-7046

[kevin@fxua.edu](mailto:kevin@fxua.edu)



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**From:** Sandra Luevano <[sl@petersenfirm.com](mailto:sl@petersenfirm.com)>

**Sent:** Friday, April 03, 2020 5:05 PM

**To:** Rosa-Casanova, Sylvia <[sylviarosacasanova@schev.edu](mailto:sylviarosacasanova@schev.edu)>; Defilippo, Joseph (SCHEV) <[joedefilippo@schev.edu](mailto:joedefilippo@schev.edu)>

**Cc:** Chap Petersen <[REDACTED]>; Ahmed Alwani <[aalwani@fxua.edu](mailto:aalwani@fxua.edu)>; Kevin Martin <[kevin@fxua.edu](mailto:kevin@fxua.edu)>

**Subject:** FXUA's Response to Report of 2020 Limited Audit by SCHEV

Ms. Rosa-Casanova and Dr. DeFilippo,

I hope you and SCHEV's team are well.

In the link below, please find FXUA's Response to SCHEV's February 4, 2020 Report of Audit pertaining to the limited audit performed by SCHEV on January 28-29, 2020.

[FXUA's April 3, 2020 Response to SCHEV](#)

We have bookmarked the PDF file for ease of reference.

Per your communications with Mr. Petersen, a binder containing a hard copy of FXUA's Response was mailed to you via first-class mail.

Thank you,

[Redacted]

The content contained in this email may include information which is protected by the attorney-client or work product privilege. If you come into contact with this information accidentally, please notify the sender and discard the message immediately. Thank you.

## Michelle Edwards

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**From:** Rosa-Casanova, Sylvia <sylviarosacasanova@schev.edu>  
**Sent:** Tuesday, February 4, 2020 9:22 AM  
**To:** peterblake@schev.edu; Defilippo, Joseph (SCHEV); Love, Deborah A.; Michelle Edwards  
**Subject:** Fairfax U of America  
**Attachments:** ROA and Letter limited scope audit january 2020.PDF

See attached for results of the limited scope audit per the Consent agreement with Fairfax U of America (formally Virginia International University)

Sylvia Rosa-Casanova  
Director, Private Postsecondary Education  
State Council of Higher Education for Virginia (SCHEV)  
101 N. 14th Street  
Richmond VA 23219  
(P) 804-225-3399 (C) 804-592-8772  
(F) 804-225-2604



*COMMONWEALTH of VIRGINIA*  
*STATE COUNCIL OF HIGHER EDUCATION FOR VIRGINIA*  
*James Monroe Building, 101 North Fourteenth Street, Richmond, VA 23219*

Peter Blake  
Director

(804) 225-2600  
www.schev.edu

February 4, 2020

President Ahmed Alwani  
Fairfax University of Virginia  
4401 Village Drive  
Fairfax, VA 22030

Dear Mr. Alwani:

In accordance with the consent agreement between the State Council of Higher Education for Virginia (SCHEV) and Fairfax University of Virginia (FXUA) (formally known as Virginia International University), signed on June 13, 2019, I write to inform you that SCHEV staff has completed its limited scope audit and has prepared a Report of Audit. Pursuant to 8VAC40-31-200(D) of the Virginia Administrative Code, SCHEV staff will present the results of the limited scope audit to Council at the next feasible meeting. Council will review the report and determine the next actions to be pursued by staff. We will notify you of the time and place of the presentation to Council in advance of the meeting.

The enclosed report reflects two repeat items of non-compliance from the August 8-9, 2018 audit. While we have not indicated that you are required to respond to the violations noted on the report, you may wish to submit a response for our review. Please submit your response no later than **April 3, 2020**.

Please contact Art Wells at 804-786-1448 or via e-mail at [alfonsowells@schev.edu](mailto:alfonsowells@schev.edu) with any questions you may have regarding this letter or the results of the limited scope audit.

Sincerely,

(b)(6)

Sylvia Rosa-Casanova  
Director, Private Postsecondary Education

Enclosures

C: Ms. Deborah Love, Senior Assistant Attorney General, Education  
Ms. Michelle Edwards, President/CEO, ACICS

# **STATE COUNCIL OF HIGHER EDUCATION FOR VIRGINIA**

## **Report of Audit**

**Fairfax University of Virginia (FXUA)**

**Limited Scope Audit Date: August January 28-29, 2020**

Report Date: February 4, 2020

### **UNRESOLVED ITEMS OF NON-COMPLIANCE**

#### **1. INSTRUCTORS NOT QUALIFIED TO TEACH ASSIGNED COURSES**

**(Repeat Finding: August 14-16, 2018)**

##### **8 VAC 40-31-140(D)(3)(4)**

- All instructional faculty members who teach in programs at the baccalaureate level shall hold a master's degree in the discipline being taught or hold a master's degree in an area other than that being taught with at least 18 graduate semester hours in the teaching discipline from an accredited college or university.
- All instructional faculty teaching in a program at the master's level or higher shall hold a doctoral or other terminal degree in the discipline being taught from an accredited college or university. Exception to academic preparation requirements for instructional faculty may be made in instances where substantial documentation of professional and scholarly achievements and/or demonstrated competences in the discipline can be shown. The institution must document and justify any such exception.

#### **Finding:**

The SCHEV audit team reviewed the files of thirty instructors teaching at the baccalaureate and/or master's degree level. Two did not have required documentation in the faculty file to support teaching the courses assigned. The following instructors do not have the appropriate documentation:

<b>Instructor</b>	<b>Course</b>	<b>Comments</b>
	Baccalaureate & master's level business courses.	Doctorate of Management in Organizational Leadership, Information Systems & Technology qualify Dr. Galloway to teach: Hospitality & Tourism Mgmt. Event Planning & Mgmt. &

		International Mgmt.
	Spanish Classes	No foreign transcript evaluation found in the file.

**2. INSTITUTION DOES NOT COLLECT ALL ITEMS JUSTIFYING ADMISSION**  
 (Repeat Finding: August 14-16, 2018)

**8 VAC 40-31-160(E)(1)(4)**

The postsecondary school shall maintain records on all enrolled students. At a minimum, these records shall include:

- Each student's application for admission and admissions records containing information regarding the educational qualifications of each regular student admitted that are relevant to the postsecondary school's admissions standards. Each student record must reflect the requirements and justification for admission of the student to the postsecondary school.
- A record of all financial transactions between each individual student and the school including payments from the student, payments from other sources on the student's behalf, and refunds. When tuition and fees are paid by the student in installments, clear disclosure of truth-in-lending statement must be provided to and signed by the student.

**Finding:**

- FXUA is not collecting relevant and proper documentation to prove that students are meeting its admissions policy. The following student files were reviewed and found to be missing documents:

Student	Missing documents
	No Statement of Purpose; Resume; Letter of Recommendation; No truth in Lending statement
	No Statement of Purpose; Resume; Letter of Recommendation; No truth in Lending statement
	No truth in Lending statement
	No Statement of Purpose; Resume; Letter of Recommendation; transcript not evaluated for US equivalency
	No Statement of Purpose; Resume; Letter of Recommendation; transcript not evaluated for US equivalency
	No truth in Lending statement;

	No truth in Lending statement; Degree from a foreign country not evaluated for equivalency; No proof of English requirement
	No truth in Lending statement; Degree from a foreign country not evaluated for equivalency
	No truth in Lending statement; Degree from a foreign country not evaluated for equivalency;
	No truth in Lending statement;
	Degree from a foreign country not evaluated for equivalency;
	No Statement of Purpose; Resume; Letter of Recommendation; No indication of ESL course in the transcript but it was required; TOEFL required-79, score is 76.
	No truth in Lending statement;

SCHEV staff noted the following items during the review of student records:

- Transcripts indicate students are granted graduate admission for degrees earned at foreign institutions. The file does not provide proof that the foreign degree was evaluated for equivalency to a US degree. In many instances, the foreign degree was evaluated by TXUA or by the foreign issuing institution and accepted as meeting US equivalency.
- Students who were granted a payment plan option and paid tuition in installments did not show a signed truth-in-ending statement.
- Some student records did not reflect proof of English requirement by meeting minimum scores on tests.

## Michelle Edwards

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**From:** David Moser  
**Sent:** Wednesday, January 15, 2020 2:32 PM  
**To:** acicsinfo@viu.edu  
**Cc:** Michelle Edwards; sylviarosacasanova@schev.edu  
**Subject:** ACICS Acknowledgement of Receipt of Requested Information 00023099 FUA  
**Attachments:** 00023099\_FUA\_Conclusion of Review.pdf

January 15, 2020

VIA EMAIL

DECEMBER 2019 COUNCIL ACTION LETTER

Attached is your Council action letter with the results of the December 2019 Council meeting. Please keep this letter in your records, as we will not be sending a hard copy. The Council will retain a copy of the letter for your institution's file. If you have any questions, please contact the ACICS staff member listed in the last paragraph of the letter.

Thank you.

David J Moser  
Accreditation Content Editor  
Accrediting Council for Independent Colleges and Schools

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January 15, 2020

ID Code 00023099(MC)

**VIA EMAIL**

[acicsinfo@viu.edu](mailto:acicsinfo@viu.edu)

Dr. Ahmed Alwani  
Interim President  
Fairfax University of America  
4401 Village Drive  
Fairfax, VA 22030

**Subject: Acknowledgement of Receipt of Requested Information**

Dear Dr. Alwani:

At its December 2019 meeting, the Council considered the institution's response to its letter dated August 19, 2019, requesting information on the winding down and cessation of all distance education activities at the institution, consistent with the Consent Agreement with the State Council on Higher Education of Virginia (SCHEV).

In addition to providing a copy of its communication to SCHEV concerning the matter, the institution provided the following documents, as requested:

1. A copy of the refund check in the amount of \$2562.00 to former student [REDACTED]
2. Withdrawal notices, institutional transfer documents, and program transfer to residential for the five other students who were previously undecided.
3. The three students completing their program through teleconferencing have since graduated on December 16, 2019, and formal acknowledgement from ACICS has been sent concerning the cessation of all Distance Education activity.

Based on the information provided, the institution has satisfied the remaining concerns, and no additional information is needed at this time. However, the institution is advised that its ongoing compliance with all ACICS standards and expectations is subject to review, including an unannounced visit, by the Council at any time.

Sincerely,

[REDACTED]  
(b)(6)

Michelle Edwards  
President & CEO

c: Ms. Sylvia Rosa-Casanova, State Council of Higher Education for Virginia  
(sylviarosacasanova@schev.edu)



## Michelle Edwards

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**From:** David Moser  
**Sent:** Monday, August 19, 2019 1:08 PM  
**To:** acicsinfo@viu.edu  
**Cc:** nancy.paula.gifford@ed.gov; sylviariosacasanova@schev.edu; katherine.h.westerlund@ice.dhs.gov; james.d.hicks@ice.dhs.gov; Michelle Edwards; Perliter Walters-Gilliam  
**Subject:** ACICS Vacate Show-Cause Directive and Request Information 00023099 VIU  
**Attachments:** 00023099\_VIU\_VSC.pdf

August 19, 2019

VIA E-MAIL

AUGUST 2019 COUNCIL ACTION LETTER

Attached is your Council action letter with the results of the August 2019 Council meeting. A hard copy will be mailed to you for your records. The Council will retain a copy of the letter for your institution's file. If you have any questions, please contact the ACICS staff member listed in the last paragraph of the letter.

Thank you.

**David J Moser**  
**Accreditation Content Editor**  
**Accrediting Council for Independent Colleges and Schools**

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August 19, 2019

ID Code 00023099(MC)

**VIA EMAIL AND REGULAR MAIL**

*acicsinfo@viu.edu*

Dr. Isa Sarac  
President and CEO  
Virginia International University  
4401 Village Drive  
Fairfax, VA 22030

**Subject: Vacate Show-Cause Directive and Request Information**

Dear Dr. Sarac:

At its August 2019 meeting, the Council considered the institution's response to the continued show-cause directive regarding the State Council of Higher Education for Virginia's (SCHEV) intent to revoke Virginia International University's (VIU) certificate to operate. In its response, the institution provided a copy of the signed Consent Agreement with SCHEV, which outlines the cessation of distance education instruction through 2022, as well as the follow-up visit to take place within six months. The institution detailed the current status of each of the 16 online students who are being accommodated either to facilitate their transition to residential programs or withdraw from their program of study, or who are scheduled to graduate. In addition, the Council noted the following:

1. While the institution is taking the appropriate steps to comply with the State's directive, ACICS has not yet been formally notified of the termination of distance education as an approved mode of educational delivery.
2. There were three students ( [REDACTED] ) who were working on transferring to other universities, one (Harriet Cimeli) who was still considering options, and one ( [REDACTED] ) with whom no contact has been made. Another student ( [REDACTED] ) was to be refunded \$2,861.98. Evidence of the refund was not provided, and a final decision on the other five students could not be made until the beginning of the fall term.

**Council Action**

Therefore, the Council acted to vacate the show-cause. However, the Council requests that the following information be submitted for its review:

1. A copy of the acknowledgement by ACICS of the institution's termination of its distance education activities. This acknowledgement will be provided once ACICS has been appropriately notified of the institution's completion of the teach-out.
2. A copy of the refund check issued to [REDACTED]
3. A report with supporting documentation on the final status of the other students for whom the institution did not yet have a final determination on transfer or withdrawal.

The information listed above must be received, via the existing online application in the institution's Member Center, by **October 31, 2019**. Failure to provide all information requested by the Council may result in the withdrawal of the institution's accreditation.

Please contact Ms. Perliter Walters-Gilliam at [pwgilliam@acics.org](mailto:pwgilliam@acics.org) if you have any questions about this action.

Sincerely,

(b)(6)

Michelle Edwards  
President and CEO

- c: Ms. Cathy Sheffield, Accreditation and State Liaison, U.S. Department of Education  
Ms. Nancy Gifford, U.S. Department of Education, School Participation Team, Region III (nancy.paula.gifford@ed.gov)  
Ms. Sylvia Rosa-Casanova, State Council of Higher Education for Virginia (sylviarosacasanova@schev.edu)  
Ms. Katherine Westerlund and Mr. James Hicks, U.S. Immigration and Customs Enforcement, Student Exchange and Visitor Program (katherine.h.westerlund@ice.dhs.gov) (james.d.hicks@ice.dhs.gov)

## Michelle Edwards

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**From:** Katie Morrison  
**Sent:** Tuesday, May 28, 2019 11:25 AM  
**To:** acicsinfo@viu.edu  
**Cc:** aslrecordsmanager@ed.gov; nancy.paula.gifford@ed.gov; Rosa-Casanova, Sylvia (SCHEV); katherine.h.westerlund@ice.dhs.gov; james.d.hicks@ice.dhs.gov; Michelle Edwards; Perliter Walters-Gilliam  
**Subject:** ACICS Continued Show-Cause Directive 00023099 Virginia International University  
**Attachments:** 00023099\_VIU\_CSC - External Information.pdf  
**Importance:** High

May 28, 2019

VIA EMAIL

MAY 2019 COUNCIL ACTION LETTER

Attached is your Council action letter with the results of the May 2019 Council meeting. A hard copy will be mailed to you for your records. The Council will retain a copy of the letter for your institution's file. If you have any questions, please contact the ACICS staff member listed in the last paragraph of the letter.

Thank you.

Katie Morrison

Accrediting Council for Independent Colleges and Schools

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**MARK YOUR CALENDAR for the ACICS Professional Development Conference and Annual Meeting "Ensuring Quality through Transparency and Accountability" to be held at the Hyatt Regency Crystal City, VA Wednesday, May 8, 2019 – Friday, May 10, 2019.**



May 28, 2019

ID Code 00023099(MC)

VIA EMAIL AND USPS DELIVERY

*acicsinfo@viu.edu*

Dr. Isa Sarac  
President and CEO  
Virginia International University  
4401 Village Drive  
Fairfax, VA 22030

**Subject: Continued Show-Cause Directive – External Information**

Dear Dr. Sarac:

At its May 2019 meeting, the Council reviewed your institution's response to the show-cause directive issued in the letter dated March 22, 2019, regarding the State Council of Higher Education for Virginia's (SCHEV) staff recommendation and Council acceptance of the intent to revoke Virginia International University's (VIU) certificate to operate. The Council also considered the testimony provided by the institution's leadership at the hearing before the Council on May 8, 2019. As a result of its review, the Council notes the following:

1. Following its August 2018 audit of VIU and prior to its February 2019 provision of the report of the audit, SCHEV issued a certificate to operate, with an "unconditional status," to VIU in September 2019. At this time, the institution continues to be licensed to operate and to confer credentials in the state of Virginia until a final action is taken by SCHEV, following the institution's appeal, if applicable. VIU has an informal fact-finding conference with SCHEV scheduled for May 29, 2019, in Richmond, Virginia.
2. VIU has temporarily ceased operation of its distance education program for the Summer 2019 term and notified its students of the online hold and the reasons for it. Therefore, while the institution has also indicated its willingness to discontinue all distance education course offerings, if necessary for the health of its operations, it has not yet done so.
3. To improve the quality of its residential course offerings and its future distance education offerings, the institution has implemented the following, among others:
  - a. A 5-student course minimum for its online courses, with exceptions for courses necessary to fulfill students' program requirements, in order to ensure an appropriate amount of peer interaction is possible;
  - b. A change to requiring all course assignments to be submitted to Turnitin to check for academic integrity. Previously, the use of Turnitin for assignments was optional. The institution has identified and acted on more instances of plagiarism,

- using Turnitin, and review by faculty and its Quality Assurance department, in the past few months since this implementation;
- c. Revision of the institution's online education manual for faculty teaching in the online setting;
  - d. Transformation of the institution's demo process, in which faculty show how they can perform tasks for online instruction, into required and supplemental training processes for online faculty, "regardless of their prior experience in teaching online education." This includes "a course on online course facilitation, as well as a course on the Canvas Learning Management System";
  - e. A new observation system for distance education courses, in which faculty preparedness and quality of course instruction and facilitation are evaluated by the faculty's program/department chair (and by another faculty member in the department if the course is taught by the chair), using "Course Readiness" and "Online Course Facilitation Observation" forms; and
  - f. Establishment of a "Scholarship & Academic Work" policy which identifies the institution's expectation for these areas, as well as the formal connection between its attendance policy, and the rigor of participation in online courses. Students' attendance is dependent on their contribution of meaningful and substantive participation, as well as timely completion of assigned activities.
4. The institution provided a teach-out plan and student audit which identify that, at the time of submission, there were 272 students enrolled in 20 programs at the institution. Most students enrolled are anticipated to graduate by December 2023. VIU provided a list of institutions, for each program, which offer similar programs which VIU students may be able to attend to complete their degrees in the event of institutional closure. One such institution is University of the Potomac, for which VIU provided a "teach-out agreement" effective December 31, 2017, and which appears more transfer agreement-like in nature.

### **Council Action**

Therefore, given the continued uncertainty of the institution's authorization to operate by SCHEV, as well as the hiatus of its distance education program, the Council acted to continue the show-cause directive for subsequent review at its August 2019 meeting.

In written response to the show-cause directive, the institution must submit the following information by **July 19, 2019**:

1. A summary of the institution's fact-finding conference with SCHEV, to include the outcome of the conference. Documentation must include all communication between the institution and SCHEV as to the status of the institution's approval to operate. The institution is reminded that in the event of a revocation of its license to operate by the state, it is required to notify ACICS immediately of such action.
2. A status update and clarity on the institution's plans for its distance education offerings.

VIU must also provide immediate notification to ACICS upon the reinstatement of its online education program (at any time prior to, on, or after July 19, 2019). The Council reserves the right to conduct a visit to the institution to review the quality of the online program at any time following its reinstatement.

3. An updated audit of students, for the Teach-Out Plan, which shows their progression towards completion of their respective programs.

The information listed above must be received, via the existing online Show-Cause Application in the institution's Member Center, by the date indicated above. Failure to provide all information requested by the Council may result in the withdrawal of the institution's accreditation.

The Council is obligated to take adverse action against any institution that fails to come into compliance within established time frames without good cause, pursuant to Title II, Chapter 3, Introduction of the *Accreditation Criteria*.

If you have any questions about this action, please contact Ms. Perliter Walters-Gilliam at [pwgilliam@acics.org](mailto:pwgilliam@acics.org).

Sincerely,

(b)(6)

Michelle Edwards  
President and CEO

- c: Ms. Cathy Sheffield, Accreditation and State Liaison, U.S. Department of Education  
Ms. Nancy Gifford, U.S. Department of Education, School Participation Team, Region III ([nancy.paula.gifford@ed.gov](mailto:nancy.paula.gifford@ed.gov))  
Ms. Sylvia Rosa-Casanova, State Council of Higher Education for Virginia  
([sylviarosacasanova@schev.edu](mailto:sylviarosacasanova@schev.edu))  
Ms. Katherine Westerlund and Mr. James Hicks, U.S. Immigration and Customs Enforcement, Student Exchange and Visitor Program  
([katherine.h.westerlund@ice.dhs.gov](mailto:katherine.h.westerlund@ice.dhs.gov)) ([james.d.hicks@ice.dhs.gov](mailto:james.d.hicks@ice.dhs.gov))

## Michelle Edwards

---

**From:** Katie Morrison  
**Sent:** Tuesday, April 23, 2019 1:16 PM  
**To:** acicsinfo@viu.edu  
**Cc:** Michelle Edwards; Perliter Walters-Gilliam; Cathy Kouko  
**Subject:** Virginia International University Show-Cause - Scheduled Hearing Notification  
**Attachments:** 00023099\_VIU Show-Cause\_Scheduled Hearing Notification.pdf

**Importance:** High

Good afternoon, Dr. Sarac,

Please find attached formal notification of the assigned show-cause hearing date, time and panel for Virginia International University at the ACICS office in Washington, D.C.

Please let us know if you have any questions or comments in regards to the notification.

Thank you,

Katie Morrison

Accrediting Council for Independent Colleges and Schools

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**MARK YOUR CALENDAR for the ACICS Professional Development Conference and Annual Meeting "Ensuring Quality through Transparency and Accountability" to be held at the Hyatt Regency Crystal City, VA Wednesday, May 8, 2019 – Friday, May 10, 2019.**

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## Perlter Walters-Gilliam

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**To:** Perlter Walters-Gilliam  
**Subject:** FW: ACICS Institutional Show-Cause Directive - External Information 00023099 Virginia International University

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**From:** Katie Morrison  
**Sent:** Friday, March 22, 2019 3:39 PM  
**To:** 'acicsinfo@viu.edu' <[acicsinfo@viu.edu](mailto:acicsinfo@viu.edu)>  
**Cc:** 'isarac@viu.edu' <[isarac@viu.edu](mailto:isarac@viu.edu)>; 'aslrecordsmanager@ed.gov' <[aslrecordsmanager@ed.gov](mailto:aslrecordsmanager@ed.gov)>; 'nancy.paula.gifford@ed.gov' <[nancy.paula.gifford@ed.gov](mailto:nancy.paula.gifford@ed.gov)>; 'Rosa-Casanova, Sylvia (SCHEV)' <[SylviaRosaCasanova@schev.edu](mailto:SylviaRosaCasanova@schev.edu)>; 'katherine.h.westerlund@ice.dhs.gov' <[katherine.h.westerlund@ice.dhs.gov](mailto:katherine.h.westerlund@ice.dhs.gov)>; 'james.d.hicks@ice.dhs.gov' <[james.d.hicks@ice.dhs.gov](mailto:james.d.hicks@ice.dhs.gov)>  
**Subject:** ACICS Institutional Show-Cause Directive - External Information 00023099 Virginia International University  
**Importance:** High

March 22, 2019

VIA EMAIL

MARCH 2019 COUNCIL ACTION LETTER

Attached is your Council action letter with an Executive Committee decision. A hard copy will be mailed to you for your records. The Council will retain a copy of the letter for your institution's file. If you have any questions, please contact the ACICS staff member listed in the last paragraph of the letter.

Thank you.

**Katie Morrison**  
Accreditation Content Editor  
**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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**CONFIDENTIALITY NOTICE:**

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March 22, 2019

ID Code 00023099(MC)

VIA EMAIL AND UPS DELIVERY

[acicsinfo@viu.edu](mailto:acicsinfo@viu.edu)

Dr. Isa Sarac  
President and CEO  
Virginia International University  
4401 Village Drive  
Fairfax, VA 22030

**Subject: Show-Cause Directive – External Information**

Dear Dr. Sarac:

The Council reviewed the February 8, 2019, communication from the State Council of Higher Education for Virginia (SCHEV) recommending revocation of Virginia International University's certificate to operate in the State of Virginia, and confirmation from Ms. Sylvia Rosa-Casanova, Director of Postsecondary Private Education at SCHEV, that the Council had accepted the staff's recommendation at its March 18-19, 2019, meeting. This action raises serious concerns about academic quality at the institution as well as the institution's ability to continue to provide educational services to its students consistent with Sections 1-2-100(b) of the *Accreditation Criteria*.

**Council Action**

Therefore, the Executive Committee, acting on behalf of the Council, has directed the institution to show cause at a Special Meeting of the Council in May why its accreditation should not be withdrawn by suspension. The institution must **respond to this directive in person** and is required to review and follow the Council hearing procedures as detailed in Section 2-3-500 of the *Accreditation Criteria* and the "Schedule of Fees" listing on the ACICS website. The institution must provide the appropriate notification and fee within **ten business days, April 5, 2019**, of receipt of this notice.

In response to the show-cause directive, the institution must submit the following information, via the online Show-Cause Application, by **April 24, 2019**.

1. Evidence that the institution continues to be licensed to operate and to confer credentials in the state of Virginia. Documentation must include all communication between the institution and SCHEV as to the status of the institution's approval to operate. The institution is reminded that in the event of a revocation of its license to operate by the state, it is required to notify ACICS immediately of such action.

2. A complete response to SCHEV's February 8, 2019, letter which includes evidence that all academic activity, residually and online, is of sound academic quality. Documentation must be provided to demonstrate that students engage in substantive, course-related discussions online, and that faculty provide feedback and grading of corresponding depth. Similarly, that the quality of work in the classroom is reflective of the expectations of Section 3-1-500 of the *Accreditation Criteria*.

In addition to the online submission, five (5) hard copies of your response must be received in the ACICS office by the date indicated above. Failure to provide all information requested by the Council may result in the withdrawal of your institution's accreditation.

### **Institutional Teach-Out Plan**

Further, in compliance with Section 2-3-230 of the *Accreditation Criteria*, the institution is directed to submit, via the **online application**, a Teach-out Plan that includes:

- a. A listing of students with the student name; program of study; expected graduation date; and status of unearned tuition, refunds due, and current account balance for each student.
- b. A listing of comparable programs offered at other nearby institutions, in the event that teach-out agreements or transfer arrangements are needed for students to complete their programs elsewhere.
- c. Identification of a custodian for all permanent academic records, in case of institutional closure, which includes contact information for this individual or entity and the process by which students can obtain their records.
- d. A description of the financial resources available to ensure that students can complete their programs or receive refunds if the institution does cease operations.

The Council is obligated to take adverse action against any institution that fails to come into compliance with the *Accreditation Criteria* within established time frames without good cause. Please consult the Introduction of Title II, Chapter 3 for additional information.

If you have any questions about this action, please contact Ms. Perliter Walters-Gilliam at [pwgilliam@acics.org](mailto:pwgilliam@acics.org).

Sincerely,

(b)(6)

Michéne Edwards  
President and CEO

Dr. Isa Sarac  
March 22, 2019  
Page 3 of 3

- c: Ms. Cathy Sheffield, Accreditation and State Liaison, U.S. Department of Education  
(aslrecordsmanager@ed.gov)  
Ms. Nancy Gifford, U.S. Department of Education, School Participation Team, Region  
III (nancy.paula.gifford@ed.gov)  
Ms. Sylvia Rosa-Casanova, State Council of Higher Education for Virginia  
(sylviarosacasanova@schev.edu)  
Ms. Katherine Westerlund and Mr. James Hicks, U.S. Immigration and Customs  
Enforcement, Student Exchange and Visitor Program  
(katherine.h.westerlund@ice.dhs.gov) (james.d.hicks@ice.dhs.gov)

## Michelle Edwards

---

**From:** LAWRENCE LEAK <[REDACTED]>  
**Sent:** Thursday, March 21, 2019 8:33 PM  
**To:** Michelle Edwards  
**Cc:** Mr. Richard Bennett; Dr. Adriene K. Hobdy; Ms. Tibby Loveman; Perliter Walters-Gilliam  
**Subject:** Re: Show Cause Recommendation for Virginia International University

I move to issue a show cause directive to Virginia International University.

lol

*Sent by my iPhone ... iMessage • iTypos • iApologize!!*

On Mar 21, 2019, at 6:20 PM, Michelle Edwards <[medwards@acics.org](mailto:medwards@acics.org)> wrote:

EC:

Please find below a timeline of events concerning Virginia International University. Additionally, Perliter has provided context and a recommendation as a result of ARIG's discussion. This action would be consistent with previous actions we have taken when we are notified of adverse action taken by another accreditor or agency.

Timeline:

- We conducted a renewal of accreditation visit to VIU in January 2018 with 10 findings, see attached.
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- 2/8/19 SCHEV notified VIU and ACICS of the audit and the recommendation to revoke the institution's license to operate, see attached.
- 3/21/19 SCHEV notified ACICS of their intent to pursue revocation.

Please let me know if you have any questions and if you accept the recommendation by ARIG to show cause the institution. I will need a motion, a second, and subsequent vote.

Thank you,  
Michelle

---

**From:** Perliter Walters-Gilliam <[PWGilliam@acics.org](mailto:PWGilliam@acics.org)>  
**Sent:** Thursday, March 21, 2019 10:21 AM  
**To:** Michelle Edwards <[medwards@acics.org](mailto:medwards@acics.org)>  
**Cc:** Katie Morrison <[kmorrison@acics.org](mailto:kmorrison@acics.org)>; Karly Zeigler <[kzeigler@acics.org](mailto:kzeigler@acics.org)>; Steven Gelfound <[sgelfound@acics.org](mailto:sgelfound@acics.org)>  
**Subject:** Re: For ARIG Discussion - Virginia International University

Good morning everyone

I have spoken with Sylvia at SCHEV and her summation of their meeting is that their Council believes there is sufficient evidence to move ahead with the revocation of licensure action. The institution does have an opportunity to appeal that decision which would "buy them time" with a fact finding consultation which can have one of three conclusions (staff has 60 days from visit to issue report/recommendation):

1. Move ahead with revocation since additional review didn't address issues.
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3. Clearing of the intent to revoke

This is similar to the ACCT review in 2016-2017. We did conduct our RA review to VIU in 2017 with my observation of Andre as staff, Adrienne as DE, and observation by Beth from ED. I do recall Adrienne having concerns with DE but I do not remember the findings that resulted or the subsequent Council action (deferral/CW).

Consistent with the expectations of the Criteria (the specific reference escapes me), I make the recommendation to the Executive Committee that Virginia International University be directed to show cause why it's Accreditation should not be suspended because of the State's decision.

Perlter Walters-Gilliam  
Vice President - Accreditation  
ACICS

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On Mar 20, 2019, at 9:46 PM, Michelle Edwards <[medwards@acics.org](mailto:medwards@acics.org)> wrote:

<https://www.insidehighered.com/quicktakes/2019/03/20/virginia-regulators-move-shut-down-university>

Ms. Michelle Edwards  
President and CEO  
ACICS

<Pages from 00023099\_VirginiaIntnlU\_RA.pdf>

<00023099\_Virginia IntnlU\_RA-DF 4.20.18.pdf>

<00023099\_VIU\_RA-AP.pdf>

<VIU ROA and letter Aug2018.pdf>

## Michelle Edwards

---

**From:** [REDACTED]  
**Sent:** Thursday, March 21, 2019 8:54 PM  
**To:** Dr. Lawrence Leak; Michelle Edwards  
**Cc:** Mr. Richard Bennett; Dr. Adriene K. Hobdy; Perliter Walters-Gilliam  
**Subject:** Re: Show Cause Recommendation for Virginia International University

I second the motion to issue a show cause directive to Virginia International University.

Tibby

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

**From:** LAWRENCE LEAK <[REDACTED]>  
**To:** Michelle Edwards <[medwards@acics.org](mailto:medwards@acics.org)>  
**Cc:** Mr. Richard Bennett <[REDACTED]>; Dr. Adriene K. Hobdy <[REDACTED]>; Ms. Tibby Loveman <[REDACTED]>; Perliter Walters-Gilliam <[PWGilliam@acics.org](mailto:PWGilliam@acics.org)>  
**Sent:** Thu, Mar 21, 2019 7:33 pm  
**Subject:** Re: Show Cause Recommendation for Virginia International University

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Please let me know if you have any questions and if you accept the recommendation by ARIG to show cause the institution. I will need a motion, a second, and subsequent vote.

Thank you,  
Michelle

---

**From:** Perliter Walters-Gilliam <[PWGilliam@acics.org](mailto:PWGilliam@acics.org)>  
**Sent:** Thursday, March 21, 2019 10:21 AM

## Michelle Edwards

---

**From:** Adriene Hobby <[REDACTED]>  
**Sent:** Thursday, March 21, 2019 8:57 PM  
**To:** Michelle Edwards; Mr. Richard Bennett; Dr. Lawrence Leak; Ms. Tibby Loveman  
**Cc:** Perliter Walters-Gilliam  
**Subject:** Re: Show Cause Recommendation for Virginia International Unvers

I support the motion.

Adriene

[Sent from Yahoo Mail on Android](#)

On Thu, Mar 21, 2019 at 6:20 PM, Michelle Edwards <medwards@acics.org> wrote:

EC:

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Please let me know if you have any questions and if you accept the recommendation by ARIG to show cause the institution. I will need a motion, a second, and subsequent vote.

Thank you,

Michelle

## Michelle Edwards

---

**From:** Richard Bennett <[REDACTED]>  
**Sent:** Thursday, March 21, 2019 10:26 PM  
**To:** Ms. Tibby Loveman  
**Cc:** Dr. Lawrence Leak; Michelle Edwards; Dr. Adriene K. Hobdy; Perliter Walters-Gilliam  
**Subject:** Re: Show Cause Recommendation for Virginia International University

Aye, 100%.

Sent from my iPhone

On Mar 21, 2019, at 8:54 PM, "[REDACTED]" <[REDACTED]> wrote:

I second the motion to issue a show cause directive to Virginia International University.

Tibby

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

From: LAWRENCE LEAK <[REDACTED]>  
To: Michelle Edwards <[medwards@acics.org](mailto:medwards@acics.org)>  
Cc: Mr. Richard Bennett <[REDACTED]>; Dr. Adriene K. Hobdy <[REDACTED]>; Ms. Tibby Loveman <[REDACTED]>; Perliter Walters-Gilliam <[PWGilliam@acics.org](mailto:PWGilliam@acics.org)>  
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## Perlter Walters-Gilliam

---

**From:** Michelle Edwards  
**Sent:** Thursday, March 21, 2019 6:21 PM  
**To:** Mr. Richard Bennett; Dr. Adriene K. Hobdy; Dr. Lawrence Leak; Ms. Tibby Loveman  
**Cc:** Perlter Walters-Gilliam  
**Subject:** Show Cause Recommendation for Virginia International University  
**Attachments:** Pages from 00023099\_VirginiaIntnlU\_RA.pdf; 00023099\_Virginia IntnlU\_RA-DF 4.20.18.pdf; 00023099\_VIU\_RA-AP.pdf; VIU ROA and letter Aug2018.pdf

**Importance:** High

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**Sent:** Thursday, March 21, 2019 10:21 AM  
**To:** Michelle Edwards <[medwards@acics.org](mailto:medwards@acics.org)>  
**Cc:** Katie Morrison <[kmorrison@acics.org](mailto:kmorrison@acics.org)>; Karly Zeigler <[kzeigler@acics.org](mailto:kzeigler@acics.org)>; Steven Gelfound <[sgelfound@acics.org](mailto:sgelfound@acics.org)>  
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Perlter Walters-Gilliam  
Vice President - Accreditation  
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Ms. Michelle Edwards  
President and CEO  
ACICS

## Perlter Walters-Gilliam

---

**From:** Perlter Walters-Gilliam  
**Sent:** Tuesday, February 25, 2020 1:23 PM  
**To:** Perlter Walters-Gilliam  
**Subject:** Re: For ARIG Discussion - Virginia International University

**From:** Perlter Walters-Gilliam  
**Sent:** Thursday, March 21, 2019 10:21 AM  
**To:** Michelle Edwards <medwards@acics.org>  
**Cc:** Katie Morrison <kmorrison@acics.org>; Karly Zeigler <kzeigler@acics.org>; Steven Gelfound <sgelfound@acics.org>  
**Subject:** Re: For ARIG Discussion - Virginia International University

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Perlter Walters-Gilliam  
Vice President - Accreditation  
ACICS

"If I cannot do great things, I can do small things in a great way." Martin Luther King, Jr.

## Perlter Walters-Gilliam

---

**From:** Perlter Walters-Gilliam  
**Sent:** Monday, March 18, 2019 1:52 PM  
**To:** 'Rosa-Casanova, Sylvia'  
**Subject:** RE: Follow up on VIU

Hi Sylvia

Thank you for taking the time to speak with me this morning prior to your Council's meeting, at which VIU will make its case concerning SCHEV's recommendation to pursue revocation of its approval. As we discussed, we will touch base on Wednesday, following your meeting to determine what action, if any, ACICS should take in recognition of your authority over the continued approval of the institution in VA. I appreciate your continued collaboration. Have a productive Council meeting!

(b)(6)

**Vice President of 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 |

**MARK YOUR CALENDAR** for the ACICS Professional Development Conference and Annual Meeting "Ensuring Quality through Transparency and Accountability" to be held at the Hyatt Regency Crystal City, VA Wednesday, May 8, 2019 – Friday, May 10, 2019. Click [HERE](#) to register!

### CONFIDENTIALITY NOTICE:

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---

**From:** Perlter Walters-Gilliam  
**Sent:** Saturday, March 16, 2019 12:51 PM  
**To:** Rosa-Casanova, Sylvia <sylviarosacasanova@schev.edu>  
**Cc:** Michelle Edwards <medwards@acics.org>  
**Subject:** Re: Follow up on VIU

Thanks Sylvia. I'll give you a call around 9:20am on Monday.

Perlter Walters-Gilliam  
Vice President - Accreditation  
ACICS

"If I cannot do great things, I can do small things in a great way." Martin Luther King, Jr.

On Mar 16, 2019, at 12:35 PM, Rosa-Casanova, Sylvia <[sylviarosacasanova@schev.edu](mailto:sylviarosacasanova@schev.edu)> wrote:

Hi Perliter

Our academic affairs committee will meet Monday at 2 pm. Staff is presenting the results of the audit and requesting a decision by Council to move forward with revocation. The agenda item is posted on our website.

I will be in my office until about 10 when I will depart for the meeting. We can talk Monday morning

On Fri, Mar 15, 2019 at 2:29 PM Perliter Walters-Gilliam <[PWGilliam@acics.org](mailto:PWGilliam@acics.org)> wrote:

Hi Sylvia

Just wanted to touch base re VIU so let me know when you have a few minutes. Thanks!

Perlitter Walters-Gilliam  
Vice President - Accreditation  
ACICS

"If I cannot do great things, I can do small things in a great way." Martin Luther King, Jr.

--

**Sylvia Rosa-Casanova**  
**Director, Private Postsecondary Education**  
**State Council of Higher Education for Virginia (SCHEV)**  
**101 N. 14th Street**  
**Richmond VA 23219**  
**(P) 804-225-3399 (C) 804-592-8772**  
**(F) 804-225-2604**

## Perlter Walters-Gilliam

---

**From:** Perlter Walters-Gilliam  
**Sent:** Tuesday, February 12, 2019 11:11 AM  
**To:** Michelle Edwards  
**Cc:** Dymowski, Julianne E.  
**Subject:** FW: VIU Report  
**Attachments:** VIU ROA and letter Aug2018.pdf; ATT00001.htm

I am sending this email primarily for the record 😊 I spoke with Sylvia this morning and she outlined the process that was recently revised (January resolution) concerning the pathway to revocation of state authorization. At the March meeting, their Council will consider the staff's recommendation to revoke and decide whether to PROCEED with that recommendation or ask VIU to do something else. VIU's opportunity to respond to this ROA will be at that March meeting. My thought was to wait until after the March meeting and final decision to determine if a show-cause directive is warranted. Sylvia supported that thinking given that the Council will be the one making the final decision. That decision will be communicated within days of the conclusion of the meeting so we should be ready to act accordingly.

Additional perspective is appreciated – thanks!

(b)(6)

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---

**From:** Michelle Edwards  
**Sent:** Monday, February 11, 2019 3:40 PM  
**To:** Perlter Walters-Gilliam <PWGilliam@acics.org>  
**Subject:** Fwd: VIU Report

Ms. Michelle Edwards  
President and CEO  
ACICS

Begin forwarded message:

**From:** "Rosa-Casanova, Sylvia" <[sylviarosacasanova@schev.edu](mailto:sylviarosacasanova@schev.edu)>  
**Date:** February 11, 2019 at 3:32:51 PM EST  
**To:** "[peterblake@schev.edu](mailto:peterblake@schev.edu)" <[peterblake@schev.edu](mailto:peterblake@schev.edu)>, "Defilippo, Joseph (SCHEV)" <[joedefilippo@schev.edu](mailto:joedefilippo@schev.edu)>, [DLove3@oag.state.va.us](mailto:DLove3@oag.state.va.us), Michelle Edwards <[medwards@acics.org](mailto:medwards@acics.org)>, "Kanno, Jason I" <[jason.i.kanno@ice.dhs.gov](mailto:jason.i.kanno@ice.dhs.gov)>, "Doan, Kipling G" <[kipling.g.doan@ice.dhs.gov](mailto:kipling.g.doan@ice.dhs.gov)>, "Schmitt, Matthew E" <[matthew.e.schmitt@ice.dhs.gov](mailto:matthew.e.schmitt@ice.dhs.gov)>  
**Subject:** VIU Report

FYI

See attached. Original sent via certified mail to VIU.

Sylvia Rosa-Casanova  
Director, Private Postsecondary Education  
State Council of Higher Education for Virginia (SCHEV)  
101 N. 14th Street  
Richmond VA 23219  
(P) 804-225-3399 (C) 804-592-8772  
(F) 804-225-2604

## Perlter Walters-Gilliam

---

**From:** Perlter Walters-Gilliam  
**Sent:** Tuesday, February 12, 2019 7:16 AM  
**To:** Rosa-Casanova, Sylvia  
**Subject:** RE: VIU Report

You get started really early in the office 😊 I am about to get my sons up and ready for school. Would 9:20am work?

**From:** Rosa-Casanova, Sylvia <sylviarosacasanova@schev.edu>  
**Sent:** Tuesday, February 12, 2019 7:11 AM  
**To:** Perlter Walters-Gilliam <PWGilliam@acics.org>  
**Subject:** Re: VIU Report

Yes. I'm in my office now.

Sylvia Rosa-Casanova  
Director, Private Postsecondary Education  
State Council of Higher Education for Virginia (SCHEV)  
101 N. 14th Street  
Richmond VA 23219  
(P) 804-225-3399 (C) 804-592-8772  
(F) 804-225-2604

On Tue, Feb 12, 2019 at 6:57 AM Perlter Walters-Gilliam <[PWGilliam@acics.org](mailto:PWGilliam@acics.org)> wrote:

Good morning Sylvia

Do you have a few minutes this morning to discuss? Thanks!

Ms. Perlter 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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President and CEO

ACICS

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**From:** "Rosa-Casanova, Sylvia" <[sylviarosacasanova@schev.edu](mailto:sylviarosacasanova@schev.edu)>  
**Date:** February 11, 2019 at 3:32:51 PM EST  
**To:** "[peterblake@schev.edu](mailto:peterblake@schev.edu)" <[peterblake@schev.edu](mailto:peterblake@schev.edu)>, "Defilippo, Joseph (SCHEV)" <[joedefilippo@schev.edu](mailto:joedefilippo@schev.edu)>, [DLove3@oag.state.va.us](mailto:DLove3@oag.state.va.us), Michelle Edwards <[medwards@acics.org](mailto:medwards@acics.org)>, "Kanno, Jason I" <[jason.i.kanno@ice.dhs.gov](mailto:jason.i.kanno@ice.dhs.gov)>, "Doan, Kipling G" <[kipling.g.doan@ice.dhs.gov](mailto:kipling.g.doan@ice.dhs.gov)>, "Schmitt, Matthew E" <[matthew.e.schmitt@ice.dhs.gov](mailto:matthew.e.schmitt@ice.dhs.gov)>  
**Subject:** VIU Report

FYI

See attached. Original sent via certified mail to VIU.

Sylvia Rosa-Casanova  
Director, Private Postsecondary Education  
State Council of Higher Education for Virginia (SCHEV)  
101 N. 14th Street  
Richmond VA 23219  
(P) 804-225-3399 (C) 804-592-8772  
(F) 804-225-2604

## Perlter Walters-Gilliam

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**From:** Michelle Edwards  
**Sent:** Monday, February 11, 2019 3:40 PM  
**To:** Perlter Walters-Gilliam  
**Subject:** Fwd: VIU Report  
**Attachments:** VIU ROA and letter Aug2018.pdf; ATT00001.htm

Ms. Michelle Edwards  
President and CEO  
ACICS

Begin forwarded message:

**From:** "Rosa-Casanova, Sylvia" <[sylviarosacasanova@schev.edu](mailto:sylviarosacasanova@schev.edu)>  
**Date:** February 11, 2019 at 3:32:51 PM EST  
**To:** "[peterblake@schev.edu](mailto:peterblake@schev.edu)" <[peterblake@schev.edu](mailto:peterblake@schev.edu)>, "Defilippo, Joseph (SCHEV)" <[joedefilippo@schev.edu](mailto:joedefilippo@schev.edu)>, [DLove3@oag.state.va.us](mailto:DLove3@oag.state.va.us), Michelle Edwards <[medwards@acics.org](mailto:medwards@acics.org)>, "Kanno, Jason I" <[jason.i.kanno@ice.dhs.gov](mailto:jason.i.kanno@ice.dhs.gov)>, "Doan, Kipling G" <[kipling.g.doan@ice.dhs.gov](mailto:kipling.g.doan@ice.dhs.gov)>, "Schmitt, Matthew E" <[matthew.e.schmitt@ice.dhs.gov](mailto:matthew.e.schmitt@ice.dhs.gov)>  
**Subject:** VIU Report

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*COMMONWEALTH of VIRGINIA*  
*STATE COUNCIL OF HIGHER EDUCATION FOR VIRGINIA*  
*James Monroe Building, 101 North Fourteenth Street, Richmond, VA 23219*

Peter Blake  
Director

(804) 225-2600  
www.schev.edu

February 8, 2019

Dr. Isa Sarac, President  
Virginia International University  
4401 Village Drive  
Fairfax, VA 22030

**Certified Mail: 7018 0360 0000 6304 6905**

Dear Dr. Sarac:

I write to inform you that the staff of the State Council of Higher Education for Virginia (SCHEV) will report the results of Virginia International University's (VIU) most recent audit at the next feasible Council meeting, pursuant to 8VAC40-31-200(D) of the Virginia Administrative Code and in accordance with "Guidelines for Procedures Related to Audits of Certified Institutions" adopted by Council on January 14, 2019.

Staff will prepare a report recommending revocation of VIU's certificate to operate, and Council will review the report and determine the next actions to be pursued by staff. The options for action will include (but are not necessarily limited to): (i) allowing VIU to maintain its certification status; (ii) changing the VIU's certification to "conditional;" or (iii) initiating procedures, consistent with the Administrative Process Act, to revoke the school's certificate to operate.

SCHEV staff's recommendation to revoke VIU's certificate to operate is based on the following:

1. SCHEV staff conducted an audit of Virginia International University (VIU) on August 14-16, 2018.
2. SCHEV staff found five items of non-compliance.
3. Two of the non-compliant items were repeat violations from the October 2014 audit.
4. One item of non-compliance is of special significance because it adversely affects the quality of education at VIU.

The next Council meeting is scheduled for March 18-19, 2019 at Virginia Polytechnic Institute and State University (Virginia Tech) located in Blacksburg, VA. I have enclosed a Report of Audit detailing the five items of non-compliance that will be reported to Council. You are

encouraged to attend the meeting on behalf of VIU to respond to any questions that may arise. Once the agenda for the meeting has been finalized, I will provide additional information regarding the meeting times and locations.

If you have any questions, you may contact me at 804-225-3399 or via e-mail at [SylviaRosaCasanova@schev.edu](mailto:SylviaRosaCasanova@schev.edu).

Sincerely,

(b)(6)

Sylvia Rosa-Casanova  
Director, Private Postsecondary Education

Enclosures

- c: The Honorable Atif Qarni, Secretary of Education
- Mr. Peter Blake, SCHEV
- Dr. Joseph G. Defilippo, SCHEV
- Ms. Deborah Love, Senior Assistant Attorney General, Education
- Ms. Michelle Edwards, President and CEO ACICS
- Mr. Kipling Doan, Special Agent, DHS/ICE/ Homeland Security Investigation
- Mr. Jason Kanno, Adjudicator, SEVP Analysis and Operations Center, DHS/ICE
- Special Agent Matthew Schmitt, Homeland Security Investigation (HSI)

# STATE COUNCIL OF HIGHER EDUCATION FOR VIRGINIA

Report of Audit  
Virginia International University (VIU)  
Audit Date: August 14-16, 2018

Report Date: February 8, 2019

## ITEMS OF NON-COMPLIANCE

### **1. INSTRUCTORS NOT QUALIFIED TO TEACH ASSIGNED COURSES** **(Repeat Finding: October 2010 & October 2014)**

*8 VAC 40-31-140(D)(4)*

All instructional faculty teaching in a program at the master's level or higher shall hold a doctoral or other terminal degree in the discipline being taught from an accredited college or university. Exception to academic preparation requirements for instructional faculty may be made in instances where substantial documentation of professional and scholarly achievements and/or demonstrated competences in the discipline can be shown. The institution must document and justify any such exception.

#### **Finding:**

The faculty file reviewed by SCHEV staff did not support Jeffrey White's qualification to teach CMP557 or MBA640. The file does not include evidence of academic preparation to teach graduate level healthcare-related subjects.

### **2. INSTITUTION DOES NOT COLLECT ALL ITEMS JUSTIFYING ADMISSION** **(Repeat Finding: October 2010 & October 2014)**

*8 VAC 40-31-160(E)(1)*

The postsecondary school shall maintain records on all enrolled students. At a minimum, these records shall include each student's application for admission and admissions records containing information regarding the educational qualifications of each regular student admitted that are relevant to the postsecondary school's admissions standards. Each student record must reflect the requirements and justification for admission of the student to the postsecondary school.

#### **Finding:**

I. VIU is not collecting relevant and proper documentation to prove that students are meeting its admissions policy. The following student files were reviewed and found to be missing documents:

Student	Missing documents
Bayarmaa Batchuluun	No Proof of English Proficiency
Gantsetseg Khishigdeleg	No Proof of English Proficiency
Seyedali Mirmoghtadaei	No Proof of English Proficiency
Teerapongphant Buasathaporn	Degree from foreign country not evaluated for equivalency
Bayarmaa Batchuluun	Degree from foreign country not evaluated for equivalency
Gantsetseg Khishigdeleg	Degree from foreign country not evaluated for equivalency
Ahmed Obans	Degree from foreign country not evaluated for equivalency
Merina Dangol	Degree from foreign country not evaluated for equivalency
Chisolu Nwofor	Degree from foreign country not evaluated for equivalency

II. In order to enroll in certain master's level programs at VIU, students who are identified as not having the "required background" must take some or all prerequisite undergraduate courses before enrolling in core courses. In some cases prerequisite courses may be waived at the Academic Advisor's discretion.

SCHEV staff noted the following items during the review of student records:

- Transcripts indicate students are granted undergraduate "transfer" credit for courses taken at foreign institutions. The file does not provide proof that the foreign degree was evaluated for equivalency to a US degree, nor does it indicate how VIU determined the foreign course is equivalent to the course the student was granted credit for.
- Transcripts reflect the undergraduate courses taken at VIU along with the undergraduate courses taken at a foreign institution for which a student was granted "transfer" credit. In some cases, VIU did not account for all prerequisites.
- Students are allowed to enroll in the prerequisite undergraduate courses simultaneously with graduate courses.
- The student record did not reflect sufficient information regarding the student's qualification to enroll in the master's program in the first place.

Student	Program
Tamrat W. Teare	MS Computer Science
Chisolu Tobenna Nwofor	MS Info Systems Management
Sumeet Hemnani	MS Info Technology
Merina Dangol	MPA
Nhung Thi Hong Le	MS International Relations

### **3. ADMINISTRATORS ARE NOT APPROPRATELY QUALIFIED**

*8 VAC 40-31-140 (F) (5)*

Administrative personnel must be appropriately experienced and educated in the field for which they are hired, or receive documented, relevant training within the first year of Employment. Administrative personnel generally encompass individuals who oversee areas as outlined in operational and administrative standards. This includes by function, but is not limited to, titles of financial aid administrator; director of admissions; director of education; business officer or manager; director of student services (including counseling and placement), and the registrar.

#### **Finding:**

SCHEV staff determined Yoko Uchida Gursen was not qualified to act as Registrar at the time of hire in 2010 as she did not have the appropriate experience or training. In addition, there is no indication in the personnel record that she received training through a relevant group. The lack of training and experience may be a contributing factor in the lack of consistency of VIU's student records maintenance.

### **4. STUDENT FINANCIAL RECORDS ARE INADEQUATELY MAINTAINED; REFUNDS IMPROPERLY CALCULATED**

*8 VAC 40-31-160(E) (4)*

The postsecondary school shall maintain records on all enrolled students including a record of all financial transactions between each individual student and the school including payments from the student, payments from other sources on the student's behalf, and refunds.

*8 VAC 40-31-160(N) (1-12)*

In accordance with § 23-276.3 B of the Code of Virginia, the school shall establish a tuition refund policy and communicate it to students. Each school shall establish, disclose, and utilize a system of tuition and fee charges for each program of instruction. These charges shall be applied uniformly to all similarly circumstanced students.

#### **Finding:**

Based on the student financial information provided at the time of audit, SCHEV staff determined the following:

- Zainab Ally should have received a refund at the time of withdrawal.
- SCHEV staff was unable to verify whether refunds were due for the following four students due to incomplete student files:

Sergio San Martin	Syed Khaja
Elchidos Kemelbaev	Yue Liang

## 5. ON-LINE COURSE OFFERINGS DO NOT MEET STANDARDS OF TRAINING

*8VAC40-31-160 I. (1-5)*

All programs offered via telecommunications or distance education must be comparable in content, faculty, and resources to those offered in residence, and must include regular student-faculty interaction by computer, telephone, mail, or face-to-face meetings.

*8VAC 40-31-140(C)*

The course, program, curriculum and instruction must be of quality, content and length to adequately achieve the stated objective.

### **Overview:**

SCHEV staff found the quality and content of the online education provided by VIU to be patently deficient. Notable concerns include: limited peer-to-peer and student-faculty interaction; failure of instructors to adhere to standards outlined in course syllabi; rampant plagiarism; graduate level courses lacking academic rigor; online courses that are not comparable in content to those offered in residence; and grade inflation. Inadequacies found in the online course offerings reviewed by staff were not limited to one area of study or one instructor. Instead, the low quality of education passing as online education at VIU affects all programs of study on the undergraduate and graduate level.

### **Audit Process:**

Online classes reviewed were randomly selected and included:

- Undergraduate and graduate offerings
- Courses in business, computer science, project management, general education and Teaching English to Speakers of Other Languages (TESOL)
- Courses taught by nineteen different faculty members

Auditor review included:

- Online platform from the administrator point of view
- Student assignment submissions
- Student to student and faculty to student interactions
- Time students and faculty spent on the online platform
- Student grades

### **Statistics for online courses reviewed by SCHEV Staff**

Period of review: Fall 2017, Spring 2018, Summer I 2018 and Summer II 2018

Total number of courses offered during period (excluding ESL): 385

Total number of online courses offered during period: 98 (25% of total offerings)

Number of online courses reviewed by SCHEV staff: 27 (26% of online offerings)

Number of online courses reviewed with no issues to report: 3 (11% of online offerings)

## **Findings**

- I. **Limited peer-to-peer interaction** - Online classes require peer-to-peer interaction and a portion of the grade received is based on the quality of these interactions.
  - A. Peer-to-peer interaction was severely limited or impossible due to the number of students enrolled in certain classes. Out of the 98 online classes offered during the period reviewed, 26 (27%) had enrollments of three students or less. Eight classes (8%) had enrollments of one student. Even under the best circumstances, students cannot benefit from peer-to-peer interaction in classes this small.
  - B. Courses with more than three students did not fare better in peer-to-peer interaction. SCHEV staff noted very little peer-to-peer interaction in the courses reviewed. In many cases peer exchanges were inconsequential; such as “hello there, you explained very clear and easy to understand,” (sic). SCHEV found no original, meaningful communication between peers in courses where peer interaction was reviewed
  
- II. **Limited faculty-student interaction** - Online courses require faculty engagement.
  - A. Out of the 27 online courses reviewed by SCHEV staff, only three (11%) were noted to have good faculty to student engagement.
  - B. Feedback provided by instructors was random and was not helpful in improving the learning experience. Instructors did not provide constructive feedback or comments on assignments and quizzes.
  - C. SCHEV staff randomly selected 11 courses and evaluated the amount of time each faculty member spent on the online platform for the class assigned.
    1. Hours clocked in by the eleven faculty members ranged from a low of 3 hours 34 minutes to a high of 78 hours 42 minutes.
    2. Four faculty members (36%) clocked into the class more than 42.5 hours during the 8-week online session. (Note: 42.5 hours is the actual time a 3 credit face-to-face class meets during a 15 week semester.)
    3. Four (36%) clocked in between 20 and 40 hours during the 8-week online session.
    4. Three faculty members (27%) clocked in for less than 10 hours during the entire 8-week session.
  
- III. **Failure of instructors to adhere to standards outlined in course syllabi or school policy**
  - A. While the discussion forum is part of the online learning experience, student responses did not reflect a clear understanding the topic of study, yet students were not penalized for substandard postings.
  - B. Although there’s a clear policy on academic integrity, in most cases instructors did not follow policy when instances of plagiarism were detected. In some cases, the instructor would warn the student and in one case, two students received zeros for plagiarized work. This was not the norm, however.