

BMO Private Bank is a brand name used in the United States by BMO Harris Bank N.A. Member FDIC. Not all products and services are available in every state and/or location.

BMO and BMO Financial Group are trade names used by Bank of Montreal.

BMO Wealth Management is a brand name that refers to BMO Harris Bank N.A. and certain of its affiliates that provide certain investment, investment advisory, trust, banking, securities, insurance and brokerage products and services.

Investment Products are: **NOT FDIC INSURED - NOT BANK GUARANTEED – NOT A DEPOSIT – MAY LOSE VALUE**

• *Change in the Value of Your Account*

	Nov 01, 2019 to Nov 30, 2019	Sep 01, 2019 to Nov 30, 2019
Beginning Market Value	\$8,961,058.24	\$8,839,443.89
Bank Fees	-4,271.03	-12,824.51
Change in Portfolio Value		
Income	18,368.38	68,379.76
Market Change	83,904.65	164,061.10
Ending Market Value	\$9,059,060.24	\$9,059,060.24

• *Realized Gain and Loss Summary*

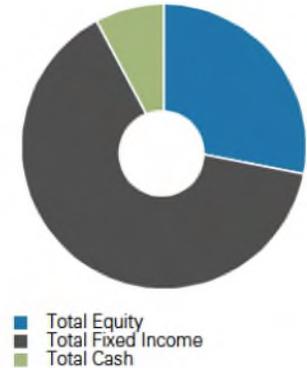
	Nov 01, 2019 to Nov 30, 2019	Sep 01, 2019 to Nov 30, 2019
Realized Capital Gain/Loss	-\$10,652.79	-\$9,998.27

• *Income Summary*

	Nov 01, 2019 to Nov 30, 2019	Sep 01, 2019 to Nov 30, 2019
Dividends	9,056.16	36,159.35
Interest	9,312.22	32,220.41
Total Income	\$18,368.38	\$68,379.76
Estimated Annual Income:	\$240,957.69	

• *Summary of Your Assets*

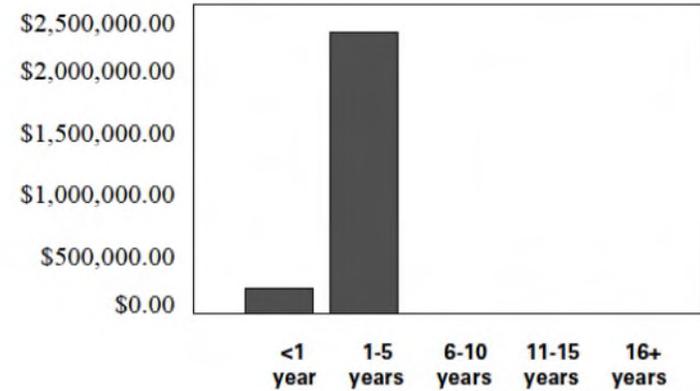
	Market Value on Nov 30, 2019	% of Your Account for Current Period
Common Stocks	598,946.11	6.61
U.S. Equity Funds	1,612,812.08	17.80
International Developed	266,328.54	2.94
Emerging Markets	70,029.90	0.77
Total Equity	\$2,548,116.63	28.13 %
Corporate and Other Taxable Bonds	2,478,458.01	27.36
Taxable Funds	2,756,077.04	30.42
Extended Fixed Funds	568,717.13	6.28
Total Fixed Income	\$5,803,252.18	64.06 %
Cash Equivalents	707,691.43	7.81
Total Cash	\$707,691.43	7.81 %
Your Total Assets	\$9,059,060.24	100.00 %



* may not add to 100% due to rounding

• *Your Bond Maturity Schedule*

Maturity Date	Market Value
Less than 1 year	
1 to 12 months	200,194.72
1 to 5 years	
13 to 24 months	815,500.77
25 to 36 months	520,717.16
37 to 48 months	836,840.37
49 to 60 months	105,204.99
Total Bonds	\$2,478,458.01



• *Summary of Sectors*

	<u>Market Value on November 30, 2019</u>	<u>% of Total Common Stocks</u>
Common Stocks		
Consumer Discretionary	92,763.16	15.49
Consumer Staples	47,138.77	7.87
Energy	36,011.65	6.01
Financials	104,670.57	17.48
Health Care	64,340.50	10.74
Industrials	82,328.92	13.75
Information Technology	151,728.20	25.33
Utilities	19,964.34	3.33
Total Common Stocks	\$598,946.11	100.00 %
Equity Funds		
U.S. Large Cap	613,156.40	
U.S. Mid Cap	613,089.13	
U.S. Small Cap	386,566.55	
Total Equity Funds	\$1,612,812.08	

• *Details of Assets in Your Account*

Description Of Asset	Quantity	X	Current Unit Value	Current Total = Market Value	Federal Tax Cost	= Unrealized Gain/Loss	Estimated Annual Income	Yield
Equity								
Common Stock								
AGCO Corp Industrials	AGCO	121.00	78.13	9,453.73	9,105.12	348.61	77.44	0.82%
Caterpillar Inc Industrials	CAT	32.00	144.73	4,631.36	3,694.72	936.64	131.84	2.85%
FedEx Corp Industrials	FDX	55.00	160.05	8,802.75	8,526.10	276.65	143.00	1.62%
Hubbell Inc Industrials	HUBB	68.00	147.02	9,997.36	9,891.21	106.15	247.52	2.48%
Oshkosh Corp Industrials	OSK	87.00	90.46	7,870.02	6,126.52	1,743.50	104.40	1.33%
Regal Beloit Corp Industrials	RBC	77.00	81.73	6,293.21	5,386.92	906.29	92.40	1.47%
Southwest Airlines Co Industrials	LUV	212.00	57.64	12,219.68	3,911.10	8,308.58	152.64	1.25%
United Rentals Inc Industrials	URI	41.00	153.05	6,275.05	4,289.01	1,986.04	0.00	0.00%
WW Grainger Inc Industrials	GWW	30.00	316.95	9,508.50	7,904.90	1,603.60	172.80	1.82%
Zebra Technologies Corp Industrials	ZBRA	29.00	250.94	7,277.26	5,090.07	2,187.19	0.00	0.00%
Amazon.com Inc Consumer Discretionary	AMZN	3.00	1 800.80	5,402.40	4,677.89	724.51	0.00	0.00%
AutoZone Inc Consumer Discretionary	AZO	10.00	1 177.92	11,779.20	6,741.69	5,037.51	0.00	0.00%

• *Details of Assets in Your Account (Continued)*

Description Of Asset		Quantity	X	Current Unit Value	= Current Total Market Value	- Federal Tax Cost	= Unrealized Gain/Loss	Estimated Annual Income	Yield
Comcast Corp Consumer Discretionary	CMCSA	329.00		44.15	14,525.35	3,985.07	10,540.28	276.36	1.90%
Discovery Inc Consumer Discretionary	DISCA	160.00		32.94	5,270.40	4,450.83	819.57	0.00	0.00%
Dollar General Corp Consumer Discretionary	DG	92.00		157.36	14,477.12	9,112.44	5,364.68	117.76	0.81%
Expedia Group Inc Consumer Discretionary	EXPE	63.00		101.66	6,404.58	8,509.66	-2,105.08	85.68	1.34%
Kohl's Corp Consumer Discretionary	KSS	68.00		47.01	3,196.68	3,074.28	122.40	182.24	5.70%
Kroger Co/The Consumer Discretionary	KR	208.00		27.34	5,686.72	4,650.44	1,036.28	133.12	2.34%
Lowe's Cos Inc Consumer Discretionary	LOW	171.00		117.31	20,060.01	11,570.12	8,489.89	376.20	1.88%
Sysco Corp Consumer Discretionary	SYU	74.00		80.55	5,960.70	4,572.03	1,388.67	115.44	1.94%
Estee Lauder Cos Inc/The Consumer Staples	EL	45.00		195.47	8,796.15	7,919.50	876.65	86.40	0.98%
Hershey Co/The Consumer Staples	HSY	27.00		148.16	4,000.32	4,136.94	-136.62	83.48	2.09%
NIKE Inc Consumer Staples	NKE	58.00		93.49	5,422.42	4,704.38	718.04	51.04	0.94%
Post Holdings Inc Consumer Staples	POST	125.00		105.60	13,200.00	11,797.45	1,402.55	0.00	0.00%
Walmart Inc Consumer Staples	WMT	132.00		119.09	15,719.88	6,601.88	9,118.00	279.84	1.78%

• *Details of Assets in Your Account (Continued)*

Description Of Asset		Quantity	X	Current Unit Value	=	Current Total Market Value	-	Federal Tax Cost	=	Unrealized Gain/Loss	Estimated Annual Income	Yield
Cabot Oil & Gas Corp Energy	COG	403.00		15.94		6,423.82		6,567.32		-143.50	161.20	2.51%
Chevron Corp Energy	CVX	97.00		117.13		11,361.61		10,196.97		1,164.64	461.72	4.06%
ConocoPhillips Energy	COP	211.00		59.94		12,647.34		10,944.42		1,702.92	354.48	2.80%
Marathon Petroleum Corp Energy	MPC	92.00		60.64		5,578.88		4,120.67		1,458.21	195.04	3.50%
Allstate Corp/The Financials	ALL	89.00		111.35		9,910.15		9,439.65		470.50	178.00	1.80%
American Express Co Financials	AXP	51.00		120.12		6,126.12		5,182.52		943.60	87.72	1.43%
Bank of America Corp Financials	BAC	140.00		33.32		4,664.80		3,694.28		970.52	100.80	2.16%
Capital One Financial Corp Financials	COF	39.00		100.01		3,900.39		3,266.25		634.14	62.40	1.60%
Citigroup Inc Financials	C	285.00		75.12		21,409.20		11,049.85		10,359.35	581.40	2.72%
Citizens Financial Group Inc Financials	CFG	270.00		38.46		10,384.20		8,504.43		1,879.77	367.20	3.54%
Discover Financial Services Financials	DFS	117.00		84.87		9,929.79		3,461.48		6,468.31	205.92	2.07%
Essex Property Trust Inc Financials	ESS	36.00		312.18		11,238.48		8,178.84		3,059.64	280.80	2.50%
Host Hotels & Resorts Inc Financials	HST	338.00		17.49		5,911.62		5,370.79		540.83	270.40	4.57%

• *Details of Assets in Your Account (Continued)*

Description Of Asset		Quantity	X	Current Unit Value	= Current Total Market Value	- Federal Tax Cost	= Unrealized Gain/Loss	Estimated Annual Income	Yield
Morgan Stanley Financials	MS	111.00		49.48	5,492.28	4,348.75	1,143.53	155.40	2.83%
Raymond James Financial Inc Financials	RJF	130.00		89.82	11,676.60	9,523.79	2,152.81	176.80	1.51%
Unum Group Financials	UNM	131.00		30.74	4,026.94	3,471.49	555.45	149.34	3.71%
Alexion Pharmaceuticals Inc Health Care	ALXN	70.00		113.94	7,975.80	7,651.93	323.87	0.00	0.00%
Eli Lilly & Co Health Care	LLY	111.00		117.35	13,025.85	9,224.20	3,801.65	286.38	2.20%
Hill-Rom Holdings Inc Health Care	HRC	69.00		107.21	7,397.49	4,327.54	3,069.95	57.96	0.78%
Hologic Inc Health Care	HOLX	248.00		51.32	12,727.36	12,159.98	567.38	0.00	0.00%
Merck & Co Inc Health Care	MRK	200.00		87.18	17,436.00	16,881.98	554.02	440.00	2.52%
Pfizer Inc Health Care	PFE	150.00		38.52	5,778.00	5,397.93	380.07	216.00	3.74%
Alphabet Inc Information Technology	GOOG	17.00		1 304.96	22,184.32	10,859.09	11,325.23	0.00	0.00%
Apple Inc Information Technology	AAPL	49.00		267.25	13,095.25	835.40	12,259.85	150.92	1.15%
Applied Materials Inc Information Technology	AMAT	117.00		57.90	6,774.30	5,469.48	1,304.82	98.28	1.45%
Cadence Design Systems Inc Information Technology	CDNS	169.00		70.25	11,872.25	10,658.42	1,213.83	0.00	0.00%

• *Details of Assets in Your Account (Continued)*

Description Of Asset		Quantity	X	Current Unit Value	= Current Total Market Value	- Federal Tax Cost	= Unrealized Gain/Loss	Estimated Annual Income	Yield
Facebook Inc Information Technology	FB	87.00		201.64	17,542.68	17,239.41	303.27	0.00	0.00%
Fortinet Inc Information Technology	FTNT	39.00		105.11	4,099.29	1,745.64	2,353.65	0.00	0.00%
Intel Corp Information Technology	INTC	236.00		58.05	13,699.80	10,818.22	2,881.58	297.36	2.17%
Microsoft Corp Information Technology	MSFT	190.00		151.38	28,762.20	6,077.72	22,684.48	387.60	1.35%
NetApp Inc Information Technology	NTAP	114.00		60.59	6,907.26	5,114.94	1,792.32	218.88	3.17%
Oracle Corp Information Technology	ORCL	211.00		56.14	11,845.54	12,208.97	-363.43	202.56	1.71%
Visa Inc Information Technology	V	81.00		184.51	14,945.31	9,759.38	5,185.93	97.20	0.65%
AES Corp/VA Utilities	AES	774.00		18.91	14,636.34	9,998.30	4,638.04	422.60	2.89%
Exelon Corp Utilities	EXC	120.00		44.40	5,328.00	5,158.84	169.16	174.00	3.27%
Sub Total Common Stock					\$598,946.11	\$429,339.14	\$169,606.97	\$9,747.96	1.63%
US Equity									
iShares Core S&P 500 ETF Large Cap	IVV	1,940.00		316.06	613,156.40	518,026.84	95,129.56	11,938.76	1.95%
Champlain Mid Cap Fund Mid Cap	CIPIX	28,743.04		21.33	613,089.13	489,370.83	123,718.30	0.00	0.00%
iShares Russell 2000 ETF Small Cap	IWM	1,146.00		161.77	185,388.42	157,937.02	27,451.40	2,243.87	1.21%

• *Details of Assets in Your Account (Continued)*

Description Of Asset	Quantity	X	Current Unit Value	= Current Total Market Value	- Federal Tax Cost	= Unrealized Gain/Loss	Estimated Annual Income	Yield
T Rowe Price Small-Cap Stock Fund Inc Small Cap	3,714.52		54.16	201,178.13	104,154.99	97,023.14	0.00	0.00%
Sub Total US Equity				\$1,612,812.08	\$1,269,489.68	\$343,322.40	\$14,182.63	0.88%
International Developed								
Tweedy Browne Global Value Fund International Developed All Cap	2,613.24		28.14	73,536.57	65,670.72	7,865.85	1,021.78	1.39%
Xtrackers MSCI EAFE Hedged Equity ETF International Developed All Cap	2,500.00		33.66	84,150.00	74,240.50	9,909.50	3,192.50	3.79%
Voya Multi-Manager International Small Cap Fund International Developed Small Cap	2,057.61		52.80	108,641.97	53,101.49	55,540.48	1,866.26	1.72%
Sub Total International Developed				\$266,328.54	\$193,012.71	\$73,315.83	\$6,080.54	2.28%
Emerging Markets								
Vanguard FTSE Emerging Markets ETF Emerging All Cap	1,665.00		42.06	70,029.90	64,908.19	5,121.71	1,894.77	2.71%
Sub Total Emerging Markets				\$70,029.90	\$64,908.19	\$5,121.71	\$1,894.77	2.71%
Total Equity				\$2,548,116.63	\$1,956,749.72	\$591,366.91	\$31,905.90	1.25%

Fixed Income

Corp & Taxable Bonds

Boston Properties LP 3.125% 01 Sep 2023 Standard & Poor's:A-	10112RAV6	200,000.00	103.02	206,043.98	201,142.84	4,901.14	6,250.00	3.03%
Burlington Northern Santa Fe LLC 3.45% 15 Sep 2021 Standard & Poor's:A+	12189LAF8	100,000.00	102.41	102,408.34	102,569.75	-161.41	3,450.00	3.37%
Chubb INA Holdings Inc 2.875% 03 Nov 2022 Standard & Poor's:A	00440EAU1	200,000.00	102.79	205,580.72	196,080.00	9,500.72	5,750.00	2.80%
Citigroup Inc 2.4% 18 Feb 2020 Standard & Poor's:BBB+	172967JJ1	200,000.00	100.10	200,194.72	198,684.00	1,510.72	4,800.00	2.40%

• *Details of Assets in Your Account (Continued)*

Description Of Asset	Quantity	X	Current Unit Value	= Current Total Market Value	- Federal Tax Cost	= Unrealized Gain/Loss	Estimated Annual Income	Yield	
Duke Energy Carolinas LLC 3.05% 15 Mar 2023 Standard & Poor's:A	26442CAV6		100,000.00	103.26	103,264.00	98,667.00	4,597.00	3,050.00	2.95%
Goldman Sachs Group Inc/The 2.6% 27 Dec 2020 Standard & Poor's:BBB+	38141GWG5		150,000.00	100.04	150,053.40	150,253.50	-200.10	3,900.00	2.60%
HSBC Holdings PLC 3.4% 08 Mar 2021 Standard & Poor's:A	404280AV1		200,000.00	101.60	203,192.58	203,326.64	-134.06	6,800.00	3.35%
Intercontinental Exchange Inc 4% 15 Oct 2023 Standard & Poor's:A	45866FAA2		200,000.00	106.57	213,144.00	203,118.91	10,025.09	8,000.00	3.75%
JPMorgan Chase & Co 4.625% 10 May 2021 Standard & Poor's:A-	46625HHZ6		200,000.00	103.67	207,345.24	205,456.25	1,888.99	9,250.00	4.46%
Marsh & McLennan Cos Inc 3.5% 29 Dec 2020 Standard & Poor's:A-	571748BE1		150,000.00	101.67	152,501.21	152,704.50	-203.29	5,250.00	3.44%
Mitsubishi UFJ Financial Group Inc 3.761% 26 Jul 2023 Standard & Poor's:A-	606822BA1		150,000.00	105.11	157,660.92	158,316.00	-655.08	5,641.50	3.58%
Nucor Corp 4.125% 15 Sep 2022 Standard & Poor's:A-	670346AL9		150,000.00	104.89	157,330.02	158,046.76	-716.74	6,187.50	3.93%
Phillips 66 4.3% 01 Apr 2022 Standard & Poor's:BBB+	718546AC8		150,000.00	105.20	157,806.42	158,394.75	-588.33	6,450.00	4.09%
Ryder System Inc 3.75% 09 Jun 2023 Standard & Poor's:BBB	78355HKH1		150,000.00	104.49	156,727.47	158,550.00	-1,822.53	5,625.00	3.59%
Schlumberger Investment SA 3.65% 01 Dec 2023 Standard & Poor's:A+	806854AH8		100,000.00	105.21	105,204.99	100,422.85	4,782.14	3,650.00	3.47%
Sub Total Corp & Taxable Bonds					\$2,478,458.01	\$2,445,733.75	\$32,724.26	\$84,054.00	3.39%

• *Details of Assets in Your Account (Continued)*

Description Of Asset	Quantity	X	Current Unit Value	= Current Total Market Value	- Federal Tax Cost	= Unrealized Gain/Loss	Estimated Annual Income	Yield
Taxable Funds								
BlackRock Strategic Income Opportunities Portfolio	BSIIX	25,252.53	9.90	250,000.00	247,310.79	2,689.21	8,535.35	3.41%
BMO Short-Term Income Fund	MSIFX	52,910.05	9.45	500,000.00	498,066.58	1,933.42	12,804.24	2.56%
BMO TCH Corporate Income Fund	MCIX	37,037.04	13.60	503,703.70	498,294.54	5,409.16	17,407.41	3.46%
Dodge & Cox Income Fund	DODIX	35,486.16	14.17	502,838.89	495,724.58	7,114.31	15,720.37	3.13%
Federated Ultrashort Bond Fund	FULIX	54,644.81	9.15	500,000.00	499,423.32	576.68	13,114.76	2.62%
Vanguard Short-Term Investment Grade Fund	VFSUX	46,554.94	10.73	499,534.45	496,030.45	3,504.00	14,618.25	2.93%
Sub Total Taxable Funds				\$2,756,077.04	\$2,734,850.26	\$21,226.78	\$82,200.38	2.98%
Extended Fixed Income								
Fidelity Advisor Floating Rate High Income Fund	315806703	60,566.26	9.39	568,717.13	568,969.34	-252.21	30,101.43	5.29%
Sub Total Extended Fixed Income				\$568,717.13	\$568,969.34	-\$252.21	\$30,101.43	5.29%
Total Fixed Income				\$5,803,252.18	\$5,749,553.35	\$53,698.83	\$196,355.81	3.38%
Cash								
Cash Equivalents								
Federated Government Obligations Fund	GOIXX	495,840.21	1.00	495,840.21	495,840.21	0.00	8,895.37	1.79%
Federated Government Obligations Fund	GOIXX	211,851.22	1.00	211,851.22	211,851.22	0.00	3,800.61	1.79%
Sub Total Cash Equivalents				\$707,691.43	\$707,691.43	\$0.00	\$12,695.98	1.79%
Total Cash				\$707,691.43	\$707,691.43	\$0.00	\$12,695.98	1.79%
Total Assets In Your Account				\$9,059,060.24	\$8,413,994.50	\$645,065.74	\$240,957.69	2.66%

• **Your Account Activity**

Date	Description	Income	Principal	Realized Gain/Loss
Beginning Cash Balance		\$3,121,472.74	-\$3,121,472.74	
Bank Fees				
	Fee collected in the period 11/01/19 - 11/30/19	-4,271.03	0.00	
Total Bank Fees		-4,271.03	0.00	
Dividend				
11/01/19	Daily Rate Income on [REDACTED] For Period of 10/01/19 to 10/31/19 Due on 11/01/19	700.97	0.00	0.00
11/01/19	Daily Rate Income on [REDACTED] For Period of 10/01/19 to 10/31/19 Due on 11/01/19	880.78	0.00	0.00
11/01/19	Daily Rate Income on [REDACTED] For Period of 10/01/19 to 10/31/19 Due on 11/01/19	1,031.31	0.00	0.00
11/01/19	Daily Rate Income on [REDACTED] For Period of 10/01/19 to 10/31/19 Due on 11/01/19	1,193.99	0.00	0.00
11/04/19	Daily Rate Income on [REDACTED] For Period of 10/01/19 to 10/31/19 Due on 11/01/19	1,047.62	0.00	0.00
11/04/19	Daily Rate Income on [REDACTED] For Period of 10/01/19 to 10/31/19 Due on 11/01/19	1,397.55	0.00	0.00
11/04/19	Daily Rate Income on [REDACTED] For Period of 10/01/19 to 10/31/19 Due on 11/01/19	1,031.88	0.00	0.00
11/04/19	Daily Rate Income on [REDACTED] For Period of 10/01/19 to 10/31/19 Due on 11/01/19	1,058.36	0.00	0.00
11/06/19	Cash Dividend 0.55 USD [REDACTED] For 171.00 Shares Due on 11/06/19 With Ex Date 10/22/19	94.05	0.00	0.00
11/08/19	Cash Dividend 0.43 USD [REDACTED] For 51.00 Shares Due on 11/08/19 With Ex Date 10/03/19	21.93	0.00	0.00

• *Your Account Activity (Continued)*

Date	Description	Income	Principal	Realized Gain/Loss
11/13/19	Cash Dividend 0.36 USD [REDACTED] For 270.00 Shares Due on 11/13/19 With Ex Date 10/29/19	97.20	0.00	0.00
11/14/19	Cash Dividend 0.77 USD [REDACTED] For 49.00 Shares Due on 11/14/19 With Ex Date 11/07/19	37.73	0.00	0.00
11/15/19	Cash Dividend 0.1365 USD [REDACTED] For 774.00 Shares Due on 11/15/19 With Ex Date 10/31/19	105.65	0.00	0.00
11/15/19	Cash Dividend 0.1 USD [REDACTED] For 273.00 Shares Due on 11/15/19 With Ex Date 11/05/19	27.30	0.00	0.00
11/15/19	Cash Dividend 0.35 USD [REDACTED] For 111.00 Shares Due on 11/15/19 With Ex Date 10/30/19	38.85	0.00	0.00
11/15/19	Cash Dividend 0.285 USD [REDACTED] For 131.00 Shares Due on 11/15/19 With Ex Date 10/25/19	37.34	0.00	0.00
11/20/19	Cash Dividend 1.03 USD [REDACTED] For 90.00 Shares Due on 11/20/19 With Ex Date 10/18/19	92.70	0.00	0.00
11/22/19	Cash Dividend 0.4 USD [REDACTED] For 39.00 Shares Due on 11/22/19 With Ex Date 11/08/19	15.60	0.00	0.00
11/22/19	Cash Dividend 0.51 [REDACTED] For 285.00 Shares Due on 11/22/19 With Ex Date 11/01/19	145.35	0.00	0.00
Total Dividend		9,056.16	0.00	
Interest				
11/04/19	Interest Payment 0.02875 USD [REDACTED] 2.875% 03 Nov 2022 For 200,000.00 Par Value Due on 11/04/19 With Ex Date 11/03/19	2,875.00	0.00	0.00
11/05/19	Interest Payment 0.0108333 USD [REDACTED] 2.6% 05 Dec 2019 For 100,000.00 Par Value Due on 11/05/19 With Ex Date 11/05/19	1,083.33	0.00	0.00
11/07/19	Interest Payment 0.0072889 USD [REDACTED] 3.2% 15 Aug 2021 For 100,000.00 Par Value Due on 11/07/19 With Ex Date 11/07/19	728.89	0.00	0.00
11/12/19	Interest Payment 0.023125 USD [REDACTED] 4.625% 10 May 2021 For 200,000.00 Par Value Due on 11/12/19 With Ex Date 11/10/19	4,625.00	0.00	0.00
Total Interest		9,312.22	0.00	

• *Your Account Activity (Continued)*

Date	Description	Income	Principal	Realized Gain/Loss
Purchases				
11/13/19	Purchase 10,649.627 Units of [REDACTED] @ \$9.39	0.00	-100,000.00	0.00
11/14/19	Purchase 23,461.602 Units of [REDACTED] @ \$9.39	0.00	-220,304.44	0.00
11/21/19	Purchase 70.00 Shares of [REDACTED] @ \$109.2733 Broker Commission: USD 2.80	0.00	-7,651.93	0.00
11/21/19	Purchase 46.00 Shares of [REDACTED] @ \$110.4108 Broker Commission: USD 1.84	0.00	-5,080.74	0.00
11/21/19	Purchase 130.00 Shares of [REDACTED] @ \$16.2901 Broker Commission: USD 5.20	0.00	-2,122.91	0.00
11/21/19	Purchase 87.00 Shares of [REDACTED] @ \$198.1141 Broker Commission: USD 3.48	0.00	-17,239.41	0.00
11/21/19	Purchase 168.00 Shares of [REDACTED] @ \$49.4917 Broker Commission: USD 6.72	0.00	-8,321.33	0.00
11/21/19	Purchase 68.00 Shares of [REDACTED] @ \$145.4189 Broker Commission: USD 2.72	0.00	-9,891.21	0.00
Total Purchases		0.00	-370,611.97	
Sales				
11/14/19	Sale 26,932.084 Units of [REDACTED] Rate Daily Access Fund @ \$8.18	0.00	220,304.45	-23,922.99
11/21/19	Sale 58.00 Shares of [REDACTED] @ \$143.5752 SEC Fee: USD 0.18 Broker Commission: USD 2.32	0.00	8,324.86	1,628.18
11/21/19	Sale 21.00 Shares of [REDACTED] @ \$118.2409 SEC Fee: USD 0.06 Broker Commission: USD 0.84	0.00	2,482.16	274.57

• *Your Account Activity (Continued)*

Date	Description	Income	Principal	Realized Gain/Loss
11/21/19	Sale 107.00 Shares of [REDACTED] @ \$44.2819 SEC Fee: USD 0.10 Broker Commission: USD 4.28	0.00	4,733.78	3,437.73
11/21/19	Sale 14.00 Shares of [REDACTED] @ \$192.5129 SEC Fee: USD 0.06 Broker Commission: USD 0.56	0.00	2,694.56	230.71
11/21/19	Sale 64.00 Shares of [REDACTED] @ \$44.3383 SEC Fee: USD 0.06 Broker Commission: USD 2.56	0.00	2,835.03	83.65
11/21/19	Sale 79.00 Shares of [REDACTED] @ \$138.7764 SEC Fee: USD 0.23 Broker Commission: USD 3.16	0.00	10,959.95	2,453.62
11/21/19	Sale 52.00 Shares of [REDACTED] @ \$57.9841 SEC Fee: USD 0.07 Broker Commission: USD 2.08	0.00	3,013.02	629.35
11/21/19	Sale 106.00 Shares of [REDACTED] @ \$37.6963 SEC Fee: USD 0.09 Broker Commission: USD 4.24	0.00	3,991.48	176.94
11/21/19	Sale 159.00 Shares of [REDACTED] @ \$69.3159 SEC Fee: USD 0.23 Broker Commission: USD 6.36	0.00	11,014.64	3,645.47
Total Sales		0.00	270,353.93	
Capital Changes/Maturities				
11/05/19	Full Call 1 USD [REDACTED] 2.6% 05 Dec 2019 For 100,000.00 Par Value Due on 11/05/19 With Ex Date 11/05/19	0.00	100,000.00	0.00
11/05/19	Full Call 100:100 Debit 100,000.00 [REDACTED] 2.6% 05 Dec 2019 For 100,000.00 Par Value of Amazon.com Inc 2.6% 05 Dec 2019 Due on 11/05/19 With Ex Date 11/05/19	0.00	0.00	0.00
11/07/19	Full Call 1.02539 USD [REDACTED] 3.2% 15 Aug 2021 For 100,000.00 Par Value Due on 11/07/19 With Ex Date 11/07/19	0.00	102,539.00	0.00
11/07/19	Full Call 100:100 Debit 100,000.00 [REDACTED] 3.2% 15 Aug 2021 For 100,000.00 Par Value of Baker Hughes a GE Co LLC 3.2% 15 Aug 2021 Due on 11/07/19 With Ex Date 11/07/19	0.00	0.00	709.98

• *Your Account Activity (Continued)*

Date	Description	Income	Principal	Realized Gain/Loss
Total Capital Changes/Maturities		0.00	202,539.00	
Other Activity				
11/05/19	Adjustment - Amortized Premium Current Year of [REDACTED] 2.6% 05 Dec 2019 - Adjustment Amount of \$72.06, Federal Cost \$72.06, State Cost \$72.06	0.00	0.00	0.00
11/07/19	Adjustment - Amortized Premium Current Year of [REDACTED] 3.2% 15 Aug 2021 - Adjustment Amount of \$220.98, Federal Cost \$220.98, State Cost \$220.98	0.00	0.00	0.00
11/12/19	Adjustment - Amortized Premium Current Year of [REDACTED] 4.625% 10 May 2021 - Adjustment Amount of \$1,811.57, Federal Cost \$1,811.57, State Cost \$1,811.57	0.00	0.00	0.00
Total Other Activity		0.00	0.00	
ACM Activity				
11/22/19	Sweep purchases totaling 9,018.44 units of [REDACTED] (Capital) (14 Transactions)	0.00	-9,018.44	0.00
11/25/19	Sweep sales totaling -104,491.35 units of [REDACTED] (Capital) (3 Transactions)	0.00	104,491.35	0.00
11/26/19	Sweep purchases totaling 211,851.22 units of [REDACTED] for FIMT-8Y TAX NTR (Capital) (1 Transactions)	0.00	-211,851.22	0.00
Total ACM Activity		0.00	-116,378.31	
Ending Cash Balance		\$3,135,570.09	-\$3,135,570.09	-\$10,652.79

• Customer Notes

1. Prices, most of which are provided by national pricing services, are not guaranteed for accuracy or realizable value. Generally, the price shown for market-traded securities is the closing price as of the statement date. If a price is not received for that date, then the price will be the last price received. Non-market traded security prices are based on the most recent values provided or obtained. Securities traded in a foreign market show a local market price. A currency exchange rate has been applied so the Market Value is in U.S. dollars.
2. Percentage columns may not total 100.0 due to rounding.
3. For Individual Retirement Trust (IRT) accounts, you have the right to modify the withholding instructions you have on file with us at any time. If you wish to do so, please contact your account administrator.
4. Estimated annual income is based on current assets and returns. It is a snapshot of your account as of the statement date. Variations in the asset composition and returns of the account will change these estimates. Please keep in mind that these are estimates only and not a guarantee of income.
5. Income and gain/loss information are based on the best information we have at the time of the transaction, some of which may have been provided by third parties. Subsequent changes can occur during the year. Also, in some instances, such as complex corporate mergers or tenders, the taxability of the transaction cannot adequately be reflected on your statement. Therefore, you should only use the official tax information letter, which is sent to you after the year-end, in preparation of your tax return.
6. You will receive an official tax information letter after the end of the tax year which advises you regarding the amounts you should include in your tax return. Do not rely on the income reported on this statement to prepare your taxes.
7. Trust accounting income is reflected in the section entitled "Your Account Activity". If your account is a Trust or an Estate, and BMO Harris or an affiliate is Trustee/ Co-Trustee or Executor/ Co-Executor, we will first apply the provisions specified in the governing document(s) or, in the absence of such provisions, the appropriate state law that applies for the allocation of income and principal as it relates to receipts and disbursements. Thus, the allocation may vary from state to state and account to account.
8. Receipt of this account statement will serve to confirm that the individual(s) with investment authority (i) directed or approved all account transactions listed on the account statement and (ii) ratifies all trades disclosed on the account statement. Please contact your portfolio manager or trust administrator with any questions.
9. For trust accounts governed by Arizona, Arkansas, Colorado, Kansas, Kentucky, Maine, Michigan, Missouri, Nebraska, New Hampshire, New Mexico, North Dakota, Virginia, West Virginia, Wisconsin, or the District of Columbia law, a beneficiary may not commence a proceeding against a trustee for breach of trust more than one year after the date the beneficiary or a representative of the beneficiary was sent a report that adequately disclosed the existence of a potential claim for breach of trust.
10. For trust accounts governed by Delaware law, a person may not initiate a proceeding against a trustee for breach of trust (i) more than one year after the date such person was sent a report that adequately disclosed the facts constituting the potential claim for breach of trust, (ii) more than 120 days after the trustee has ceased to serve and such person was sent a report that adequately disclosed the facts constituting the potential claim for breach of trust, or (iii) if earlier, after the date the proceeding was otherwise precluded by adjudication, release, consent or limitation.
11. For trust accounts governed by Florida law, a beneficiary may not commence a proceeding against a trustee for breach of trust with respect to a matter that was adequately disclosed in a trust disclosure document unless a proceeding to assert the claim is commenced within six months after receipt of the trust disclosure document.
12. For trust accounts governed by New Jersey law, a beneficiary may not commence a proceeding against a trustee for breach of trust with respect to a matter that was adequately disclosed in a trust disclosure document unless a proceeding to assert the claim is commenced within six months after receipt of the trust disclosure document.

• *Customer Notes (continued)*

13. For trust accounts governed by Ohio law, a beneficiary may not commence a proceeding against a trustee for breach of trust more than two years after the date the beneficiary, a representative of the beneficiary, or a beneficiary surrogate is sent a report that adequately discloses the existence of a potential claim for breach of trust.
14. For trust accounts governed by Oklahoma law, a beneficiary may not commence a proceeding against a trustee for breach of trust unless a proceeding to assert the claim is commenced within two years after receipt of the report or other statement that adequately discloses the existence of the claim for breach of trust.
15. For trust accounts governed by Utah law, a beneficiary may not commence a proceeding against a trustee for breach of trust more than six months after the date the beneficiary or a person who may represent and bind the beneficiary was sent a report that adequately discloses the existence of a potential claim for breach of trust.
16. For trust accounts governed by Wyoming law, a beneficiary may not commence a proceeding against a fiduciary for breach of trust more than two years after the date the beneficiary or a representative of the beneficiary received a report that adequately discloses the existence of a potential claim for breach of trust.
17. For trust accounts governed by Oregon law, per Oregon Statute §130.820: (1) Notwithstanding ORS chapter 12 or any other provision of law, but subject to subsection (2) of this section, a civil action against a trustee based on any act or omission of the trustee, whether based in tort, contract or other theory of recovery, must be commenced within six years after the date the act or omission is discovered, or six years after the date the act or omission should have been discovered, whichever is earlier. (2) A beneficiary may not commence a proceeding against a trustee more than one year after the date the beneficiary or a representative of the beneficiary is sent a report by certified or regular mail that adequately discloses the existence of a potential claim and that informs the beneficiary of the time allowed for commencing a proceeding. A copy of this section must be attached to the report. The report must provide sufficient information so that the beneficiary or representative knows of the potential claim or should have inquired into its existence. (3) If subsections (1) and (2) of this section do not apply, a judicial proceeding against a trustee must be commenced within 10 years from the date of the act or omission complained of, or two years from the termination of any fiduciary account established under the trust, whichever is later.
18. For accounts governed by Pennsylvania law, a beneficiary is barred from challenging a transaction or asserting a claim against a trustee for breach of trust if the trustee provided the beneficiary with a written financial report that disclosed the transaction or such report provided sufficient information so that the beneficiary knew or should have known of the potential claim or should have inquired into its existence and in the 30 months after a report was sent by the trustee to the beneficiary, the beneficiary did not notify the trustee in writing that the beneficiary challenges the transaction or asserts a claim and provides in writing the basis for that challenge or assertion.
19. For accounts governed by South Dakota law, if no objection has been made by a distribution beneficiary of a trust within one hundred and eighty days after a copy of the trustee's accounting has been mailed to the distribution beneficiary, the distribution beneficiary is deemed to have approved such accounting of the trustee, and the trustee, absent fraud, intentional misrepresentation, or material omission, shall be released and discharged from any and all liability to all beneficiaries of the trust as to all matters set forth in such accounting.
20. For trust accounts governed by Washington State law, a beneficiary may not commence a proceeding against a trustee for breach of trust more than three years after the date the beneficiary or a representative of the beneficiary was sent a report that adequately discloses the existence of a potential claim for breach of trust. A beneficiary may petition the Superior Court of Washington pursuant to chapter 11.106 RCW to obtain review of the statement and of acts of the trustee disclosed in the statement.
21. If your account is a Trust or an Estate account, the statement reflects the total assets held in that Trust or Estate account and is not necessarily reflective of your rights and interests to the income or assets of the Trust or Estate. Your rights and interests with respect to income or assets detailed on this account statement are determined by the instrument or will governing the Trust or Estate and applicable law.

• **Customer Notes (continued)**

- 22. Taxable Bond Election. The IRS requires taxpayers to amortize the premium on all bonds over the life of the bond or until the bond is sold or redeemed. The annual amount of amortized premium will reduce the cost basis of the bond and may provide an offset to the income earned on the bond during the year. If the bond is a taxable bond, the taxpayer may elect out of the amortization rule; there is no opt out for tax-exempt bonds. BMO Harris will amortize premiums paid for all bonds in Client's account, including taxable bonds unless Client instructs otherwise in writing.
- 23. BMO Harris Bank's annual Privacy Policy is available for your review. For more information, please visit www.BMOHarrisBank.com/Privacy.
- 24. BMO Harris Bank's Terms and Conditions Disclosure, as part of your account agreement, is available for your review. To access the appropriate disclosure for your account, please visit www.bmo.com/privatebank/us/about/disclosure.

For accounts where BMO Harris Bank provides investment management services, this disclosure provides information on matters such as but not limited to: brokerage discretion (BMO Harris Bank's ability to engage an authorized broker-dealer to buy and sell securities without the client's consent), soft dollars (commission arrangements in which BMO Harris Bank pays brokerage firms for their services and receives products and services which assist in our investment decision making process for the benefit of all managed accounts) and statements.

For custody accounts, this disclosure provides information on matters such as but not limited to: safekeeping (BMO Harris Bank will hold assets as the custodian of the account), pledging (use of assets as collateral for a loan) and statements.

Notification Regarding Proprietary Products and Fees: If permitted, your account will likely contain BMO Harris Proprietary Products. Proprietary Products are investment products or services that are offered, sponsored, or advised by BMO Harris or its affiliates, or for which BMO Harris or its affiliates receive compensation. Proprietary Products may include certificates of deposit; mutual funds; unregistered private funds; structured products; equity, commodity, financial or other derivatives; or other securities. BMO Harris or its affiliates receives compensation directly or indirectly from the Proprietary Products. This compensation may be in addition to any advisory or subadvisory fee or investment management fee for your Account.

Details regarding Proprietary Products and fees can be found in the BMO Harris information and disclosure for the particular product, as updated from time to time ("Disclosure"). For the current copy of the Disclosure, please contact your account representative or go to www.bmoprivatebank.com/us/disclosures.

"BMO Harris" as used in these Customer Notes means BMO Harris Bank N.A.

INVESTMENT PRODUCTS:

ARE NOT FDIC INSURED

MAY LOSE VALUE

CARRY NO BANK GUARANTEE



Accrediting Council for
Independent Colleges & Schools



Updated as of 12/02/2019



Accrediting Council for Independent Colleges and Schools

POSITION DESCRIPTION

May 2018

Position: President and CEO
Type: Full time, Exempt
Reports to: ACICS Board of Directors
Supervises: Vice President of Accreditation and Vice President of Operations

Position Summary:

The President and CEO is ultimately responsible for the overall operations of the Accrediting Council for Independent Colleges and Schools (ACICS) and for the implementation of the policies and visions of the Council. The President and CEO provides leadership and direction to the staff and is the primary representative of ACICS with the member institutions, governmental, educational, agencies, professional organizations, and other accrediting agencies.

Responsibilities:

- Leadership of all ACICS activities and functions
- Implementation of Council directives and actions
- Liaison to Executive Committee
- Primary spokesperson for the Council
- Develop strong relations with the USDE, state regulators, other accrediting agencies, trade associations representing career colleges, and other ACICS constituents
- Effective performance management of ACICS staff
- Interaction with ACICS accredited institutions
- Assist in development and implementation of Strategic Plan
- Travel responsibilities as required to monitor accrediting activities and meet with colleagues
- Other tasks as assigned by the Board of Directors

Qualifications:

- Earned graduate or professional degree
- Ten years management experience that includes a demonstrated understanding of the career education sector in a post-secondary environment; or ten years management of a post-secondary educational institution
- Superior leadership and interpersonal skills
- Knowledge of accreditation and compliance, research and statistics, and curricular issues
- Experience in budget development, management, and investments
- Experience with media and government relations
- Experience working with volunteer boards
- Superior oral and written communications skills

(b)(6)

Employee Signature & Date

Supervisor Signature & Date



MICHELLE L. EDWARDS

KEY STRENGTHS:

Excellent oral and written communication skills
Self motivated and goal-oriented
Strong organizational, business, and financial insights
Ability to work with minimal supervision and direction

EDUCATION:

Saint Leo University – Saint Leo, Florida
Master of Business Administration
B.A. – Business Administration – Management Specialization
Minor – Human Resource Administration

HIGHLIGHTS OF PROFESSIONAL EXPERIENCE:

- 2008 - Present **Delta School of Business & Technology.** Lake Charles, LA
Dean of Academics/Corporate Secretary. Responsibilities include providing leadership, vision and direction for the development and modification of the educational programs, creating an effective environment of academic and professional excellence while meeting the key educational, compliance and financial performance targets of the school, and establishing and communicating accountabilities and performance expectations for 20 direct reports consisting of both faculty and staff.
- Duties also include maintaining strict regulatory compliance in regards to state, accreditation and Federal guidelines, developing, monitoring and implementing policies for the selection, evaluation and training of faculty and discussing any areas of concern and promoting plans of action to improve conditions when necessary. Heavily focused on evaluation and development of course and program curriculum. Design and implement yearly faculty development activities.
- 2005 - 2008 **The Chamber SWLA.** Lake Charles, LA
Vice-President, Membership. Responsibilities include recruiting new members, retaining current members, creating new programs and events to stimulate growth in southwest Louisiana, and working to create economic development opportunities within our region. Duties also include involvement with creating and managing an annual budget of over \$600K, while providing support and services to over 1000 businesses in the five parish area.
- 2004 - 2005 **Randstad North America.** Atlanta, GA.
Specialty Agent. Responsibilities include building, managing, qualifying, and maintaining a portfolio of both existing clients and prospective clients, effectively recruiting, interviewing, retaining, coaching and developing Talent (temporary employees) to help them meet their professional goals, and marketing the employee's skills, knowledge and abilities to the right companies making the best match for the Client and the Talent. The main focus of my efforts is placing high end office positions while effectively managing the profitability of my portfolio.
- 2003 - 2004 **Affordable Residential Communities.** Based in Orlando, FL. Supporting locations throughout 11 states.
Field Training Specialist. Responsibilities include training management personnel on operating standards, procedures & software programs. Duties also include developing programs, evaluating and revising processes and implementing program enhancements and procedural changes. Instrumental in creating and establishing training curriculum designed to improve operating uniformity throughout the company. Scope of training executed involved one-on-one, as well as small to large classroom environments.



MICHELLE L. EDWARDS

PROFESSIONAL EXPERIENCE CONTINUED:

- 1998 - 2003 **Kinko's Inc.** Based in Orlando, FL.
Branch Trainer. Responsibilities include training and development of new and tenured coworkers in the 11 branches in the North Florida region. Facilitate entry and mid-level classes remotely as well as out of a training center. Additional responsibilities include: scheduling, administrative support, and liaison between management and co-workers.
Territory Representative. Responsibilities include managing 50-100 active accounts. Accountable for achieving growth, penetration and retention in all named accounts. Provides effective problem-solving and solutions-based selling for on-going customer satisfaction and interacts with multiple departments to ensure proper fulfillment and satisfaction of all orders.
- 1992 - 1998 **Arthur Treacher's Inc.** National Headquarters, Jacksonville, Florida. On site support provided to all Florida locations. In addition, provided locations throughout the company with phone support.
General Manager of Operations. Other responsibilities began at the Assistant Manager Level and up. Responsible for guest services, local store marketing, scheduling, ordering, loss prevention, payroll, hiring and terminating, P&L's, inventory, and continuously recruiting and training.
Franchise and Corporate Services. Responsibilities include coordinating and executing franchisee and new manager training, daily communication with franchisees and managers, maintaining franchisee files, initiated and completed all manual updates, coordinated uniform and equipment orders, frequent QSC and audit inspections, coordinated travel and lodging agendas for Directors, assisted in HR responsibilities such as due process, wage and labor, new hires, compensation, and benefits, as well as the liaison between Directors and contractors, suppliers, and vendors during construction and new unit development.

CIVIC AND PROFESSIONAL ORGANIZATIONS:

- 2015 – Present Accrediting Council of Independent Colleges and Schools (ACICS) Board of Directors
Current Chair Board of Directors/Council
- 2010 – Present Accrediting Council of Independent Colleges and Schools (ACICS) Evaluator
Focus: Team Chair, Business Specialist, Student Relations, and Educational Activities
- Junior League of Lake Charles, Inc. Board of Directors/President
- Louisiana Association of Private Colleges and Schools (LAPCS) Board of Directors
- Leadership Southwest Louisiana Council, Alumni Relations Chair
- Big Brothers Big Sisters Lunch Buddy
- Fusion Five Board of Directors
- Campfire USA Board of Directors, Chair – Board Development
- Profit and Loss Association, Member
- Louisiana Chamber of Commerce Executives (LACCE) Board of Directors
- U.S. Chamber of Commerce Institute of Organization Management



Accrediting Council for Independent Colleges and Schools

POSITION DESCRIPTION

May 2018

Position: Vice President of Accreditation

Type: Full time, Exempt

Reports to: President

Supervises: Accreditation Coordinators, Program Analysts, Manager of Policy and Institutional Compliance, Accreditation Support Coordinators and contract staff as assigned

Position Summary:

The Vice President of Accreditation is the senior administrator of the Department of Accreditation and is responsible for the systematic and consistent implementation of policies, procedures and ACICS accreditation standards pertaining to assessment of institutional compliance, quality assurance, policy, and quality enhancement. The Vice President of Accreditation is also responsible for ensuring Agency compliance with USDE regulations and reporting requirements.

Responsibilities:

- Direct and implement the *Accreditation Criteria*
- Provide membership information, statistical data, institutional reports, budget information, and support to other ACICS departments as requested for technology support systems development and electronic data management
- Supervise manager responsible for institutional quality assurance and provide executive direction to all aspects of the accreditation/visit process
- Supervise manager responsible for the recruitment, training and development of evaluators
- Supervise manager responsible for screening, guiding, and developing initial applicants for accreditation; training and development of accreditation coordinators; and continued development of institutions through accreditation workshops
- Supervise manager responsible for coordinating and providing all institutional services, including processing of all requests for approval of institutional changes and expansion of campuses
- Manage complaints and investigation of adverse information. as well as the ARIG
- Supervise staff responsible for the implementation and monitoring of the PVP
- Manage all campus development operations and development of internal processes and internal quality assurance
- Direct the development of criteria related to distance and non-traditional education; evaluation of international educational institutions; and assessment of consortium and contractual arrangements proposed by member institutions

- Be responsible for systematically presenting reports from the evaluation visits for Council consideration; assisting the Council in the decision-making process; and coordinating the notification of Council actions to institutions, other agencies, and the general public
- Interact with membership and the general public regarding compliance and accreditation issues
- Travel responsibilities, as needed
- Other tasks as assigned by President

Qualifications:

- Earned master's degree from an accredited institution, preferably an MBA or MPP or master's degree in higher education policy
- Ten years of experience in postsecondary educational institutional management; knowledge of and/or exposure to the management of proprietary institutions; or, ten years' experience in management positions within accrediting or governmental agencies charged with oversight of postsecondary educational institutions; or, a combination thereof
- In-depth knowledge of accreditation and compliance issues
- In-depth knowledge of accreditation of online and distance education programs
- Five years of supervisory and team building experience
- Ability to manage and coordinate multiple tasks with varied deadlines
- Ability to work effectively with professionals of diverse backgrounds and qualifications within a collegial setting
- Functional competence with common office equipment, computer technology and software, and office procedures
- Effective professional interpersonal, oral and written communications skills
- Integrity in handling sensitive and confidential information
- Ability to manage and coordinate personal travel expenses and authorized travel expenses of staff and evaluators
- Desire and ability to travel as necessary, domestically and internationally

(b)(6)

Employee Signature & Date

Supervisor Signature & Date

e

Perlter Walters-Gilliam

SUMMARY OF QUALIFICATIONS

Ambitious, results-oriented business professional with proven expertise in leading strategic teams to perform quality evaluations in the quality assurance and enhancement environment. Motivated achiever offering improved operational efficiency by developing and implementing successful systems and procedures. Capabilities include:

- *Problem-solving skills*
- *Development of policies & procedures*
- *Strategic analysis*
- *Training and development*
- *Interpersonal & cross-cultural communication*
- *Accreditation compliance*
- *Project management*
- *Management of Remote Teams*
- *International Education*

EDUCATION

Robert H. Smith School of Business, University of Maryland, College Park, MD

Master of Business Administration, Leadership and Strategy focus, May 2011

State University of New York at Plattsburgh, Plattsburgh, NY

Bachelor of Science in International Business, Magna cum Laude, May 2005

Bachelor of Arts in Spanish, Magna cum Laude, May 2005

EXPERIENCE

The Accrediting Council for Independent Colleges and Schools, Washington, D.C.

2007 – Present

➤ **Vice President – Accreditation**

2016 – Present

- Oversee the department and all critical functions pertaining to accreditation, including but not limited to, policy development and implementation, institutional compliance, institutional reporting, and onsite quality assurance monitoring.
- Manage a team of accreditation, policy, institutional compliance, and institutional development staff to include remote members.
- Interact with state and federal agencies on mutual areas of interest relative to institutional performance and compliance.
- Represent the agency at the Council of Higher Education Accreditation (CHEA) and United States Department of Education (USDE) meetings and other activities.
- Work with the President on daily accreditation matters including the defense of ACICS for its recognition with the USDE.

➤ **Associate Vice President, Quality Enhancement & Training**

2015 – 2016

- Oversaw quality enhancement activities, which include various workshops, Webinars, special orientations, and training support directed at member institutional representatives, volunteer evaluators, on-site evaluation chairs, and prospective applicants for initial accreditation.
- Managed the Evaluator training and development activities, which include the recruitment, vetting, training and development of volunteer evaluators and chairs of institutional evaluation visit teams.
- Led the review and preparation of initial applications for the ACICS accreditation process to include the systematic processing of initial applications—from inquiry stage to the initial grant of accreditation stage.
- Directed the recruitment, training and development of new accreditation staff to include the development of training and enhancement activities in the areas of accreditation evaluation and criteria implementation.

➤ **Senior Manager, Quality Enhancement**

2013 - 2015

- Managed workshops and other training delivery that enhance institutional effectiveness and regulatory preparedness.
- Evaluated and determined the compliance of over institutions with accreditation standards.
- Counseled institutions, primarily initial applicants, on achieving compliance with agency regulations.
- Conducted training needs analysis to design and launched professional development activities for a team of 15 travel coordinators.
- Managed the recruitment and training of over 1200 subject matter experts in the area of accreditation evaluations.

- **Manager, Institutional Development** **2011 - 2013**
 - Operationalized the New Institutional Development function that resulted in a 30% membership growth
 - Consulted with potential applicants to assess eligibility and compliance, with a 95% success rate of applicants receiving the initial award during first review.
 - Explored international opportunities in countries that include Macedonia, Bahrain, India, Antigua, and Switzerland.
 - Coached and supervised a team of up to 5 junior coordinators on organizational processes and industry expectations.

- **Senior Coordinator, New Institutional Development** **2009 – 2011**
 - Managed teams of subject matter experts to conduct on site evaluation visits to more challenging institutions.
 - Initiated the systematic review and monitoring of evaluation reports to include the quality of the templates and the final reports.
 - Served as a liaison with the department’s leadership on exploring potential applicants and providing support and guidance.

- **Accreditation Coordinator** **2007 - 2009**
 - Build and manage teams of subject matter experts from 4 to 15 members to conduct on site evaluation visits that assess the regulatory preparedness of institutions.
 - Managed the evaluation of more than 100 institutions that offer credentials from the non-degree to the master’s degree level.
 - Worked closely with all types of institutions from single campus to large corporate school systems, with enrollments ranging from 10 - 10 000 students, and operations on-ground and online.

National Association for College Admissions Counseling, Alexandria, VA 2005 - 2006

Administrative/Program Assistant

- Supported the general management of the College Fairs programs by providing backing with the planning and execution of college fairs.
- Assisted in the development and implementation of programs that streamlined the management processes in the department.
- Managed the department’s electronic database and Revenue Sharing programs.

ADDITIONAL INFORMATION

International Experience: High school Math Teacher on the island of Dominica; Semester Study Abroad in Monterrey, Mexico; Smith Global Studies to India; Business trips to India, Switzerland, Denmark, Bosnia & Herzegovina, Cayman Islands, Peru, and Taiwan; Consultations with institutions in Macedonia, Australia, India, Singapore, Jamaica, Spain, Paraguay, and Colombia to name a few.

References Furnished upon Request



Accrediting Council
for Independent
Colleges & Schools

POSITION DESCRIPTION

Position: Compliance Analyst
Type: Full time, Exempt
Reports to: Vice President of Accreditation

Position Summary:

The Compliance Analyst supports the operations of the accreditation department in several key areas including the review and oversight of the quarterly and annual accountability reports, the validation of placement data through the Placement Verification Program (PVP), recruitment and support of the evaluator volunteer program, and investigation and review of complaints and adverse information. The Analyst is a core member of the accreditation team working closely with the vice president of accreditation and others to ensure consistency in practices and compliance with ACICS standards and procedures.

Responsibilities:

CAR and PVP Review (40%)

- Maintain CAR/Reporting inboxes to include responding to emails and requests (unlocking of CAR, show-cause/withdrawal responses, etc.)
- Maintain the PVP verifications to be at 0 every week.
- Work with management on the PVP and CAR processes, as necessary.
- Prepare Program Withdrawal Appeals for the Council's review, as needed.
- Maintain and track placement actions at the campus and program level, as a result of any revisions made since the Council's decision.
- Evaluate campuses' compliance with show-cause disclosures and reporting requirements– program and campus level.
- Manage the licensure reporting requests as per Council's directive.
- Assist with the preparation and processing of SA-related Council actions and respond to institutional inquiries in a timely and professional manner.
- Other duties as assigned.

Volunteer Evaluator Program (30%)

- Maintain the evaluatormanager@acics.org inbox to include responding to emails and requests.
- Update evaluator records as appropriate to include training completion, professional development, statuses, and accounts
- Monitor the GotoWebinar Reports to ensure completion of required training.
- Communicate with evaluators, as needed, to request information or materials to maintain their ACTIVE status.

- Conduct an audit of all ACTIVE evaluators for currency and accuracy.
- Support the evaluator recruitment efforts, as needed, to staff institutional reviews.
- Other duties as assigned.

Complaints and Adverse Oversight (30%)

- Conduct the initial review of complaints and adverse information to evaluate compliance with the *Accreditation Criteria*.
- Administer the recording, review, and reconciliation of complaints.
- Communicate and provide guidance to complainants concerning the filing, review, and possible investigation of their complaints consistent with the *Accreditation Criteria*.
- Interact with institutional representatives on any open complaint cases and/or adverse information review.
- Manage the dissemination of information on complaints/adverse to travel staff, management/leadership teams, and the Council as required.
- Serve as a core member of ARIG, providing reports on the complaints/adverse activities of campuses/institutions and making recommendations, as appropriate
- Other duties as assigned.

Qualifications:

- Earned bachelor's degree from an accredited institution
- Above average understanding of ACICS standards and accreditation criteria
- Analytical skills pertaining to institutional compliance issues
- Ability to work with numerical data with extreme accuracy
- Demonstrated ability to multi-task, prioritize and meet deadlines
- Post-secondary education experience particularly supporting ACICS-accredited institutions
- Functional competence with common office equipment, computer technology and software including Excel spreadsheets and Microsoft Word, and with office policies and procedures
- Demonstrated ability to develop and maintain document and process tracking systems
- Ability to function effectively in a team environment
- Effective interpersonal, oral and written communications skills
- Integrity in handling sensitive and confidential information

(b)(6)

Employee Signature & Date

Supervisor Signature & Date

PROFILE

Senior compliance and operations leader with 20+ years' experience in management guiding and reinforcing effective practice and change, managing regulatory compliance and achieving sales and service goals to maximize business operations. Demonstrated strong strategic development, resource management, business partnerships and employee relations skills achieving progressive results, regulatory compliance and performance standards.

ASSOCIATIONS

- Member New Jersey and Pennsylvania Private Career School Associations, Association of Private Career Schools and Colleges
- Evaluator, Accrediting Council for Independent Colleges and Schools - 1996 – 2014
- ACICS Intermediary Review Committee, Appointed 2010 - 2012

EDUCATION

Rutgers University, Newark, NJ May 1998

M.A., Public Administration, Summe Cum Laude

Montclair State University, Upper Montclair, NJ May 1996

B.A. Psychology, Magna Cum Laude

WORK HISTORY

Princeton Information Technology Center, Wyncote, PA

Director, Institutional Effectiveness & Compliance

April 2016 - January 2018

Consultant

February 2018 - Present

- Responsible for all regulatory operational compliance activities for the campus to include state licensing Boards (PDE-PLS), Board of Nursing, Accreditation and Federal Title IV compliance.
- Responsible for keeping abreast of all regulatory changes and trends that can impact the operation and making adjustments in operations as necessary.
- Active participant with Pennsylvania Association of Private School Administrators (PAPSA).
- Developed and managed the compliance calendar to ensure all timelines and due dates were met.
- Lead the campus through ACICS reaccreditation process to include visit preparation and visit activities and all post visit responses to the accreditor.
- Lead the campus through the preparation and submission of the application, self-evaluation report (SER) and initial accreditation process for the transition from the Accrediting Council of Independence Colleges & Schools (ACICS) to Accrediting Bureau of Health Education Schools (ABHES). We proudly secured a four-year grant of initial accreditation.
- Responsible for managing all Federal Title IV Provisional Program Participation Agreement (PPPA) requirements imposed on ACICS schools for the 18-month window while seeking new accreditation after ACICS' loss of Department recognition.
- Responsible for all submissions to state oversight bodies and accreditors to include application and visits for new program submissions.
- Responsible for the oversight, completion and submission for annual reporting for the state licensing board, Board of Nursing and accrediting body.
- Provided sound business, managerial and financial guidance to management team as well as facilitating effective communication on a daily basis so as to reinforce teamwork and information sharing.
- improvement in the collections rate in first 60 days of employment.
- Responsible for the successful operation of the sales process and marketing of new and existing program launches.
- Effectively managed the academic programs, support activities and resources.
- Responsible for all campus and systems projects and successful implementation of work flow projects and ensuring compliance with regulatory requirements.

- Created, implemented, and balanced campus initiatives designed to increase new student enrollments and existing customer satisfaction levels.
- Human Capital Development: oversees the recruitment and development of, and retains excellent faculty and staff to include setting up development programs and timely performance reviews. Manages successions and develops staff for career growth.

Star Career Academy, NJ

2012 – 2016

Campus President 2015 – 2016

Director of Operations 2012 - 2015

- Lead campus through national accreditation process with ACCSC to include application preparation, workshop attendance, self - evaluation report completion while serving as campus president.
- Worked closely with Program Chair to secure new programs approval for culinary offerings through the state and accreditation.
- Actively supported and directed remote campus leadership through the accreditation process to include application completion and self-evaluation report submissions at multiple campus locations simultaneously.
- Review and make recommendations on all regulatory submissions to state and accrediting agencies.
- Coordinated and conducted mock accreditation visits at all eight campus locations to ensure campus compliance with state and accreditation requirements at all times.
- In conjunction with key campus level and support staff, navigated multiple campuses through regulatory challenges, development, monitoring and implementation of corrective action plans to correct areas of deficiency.
- Improved external referrals from government agencies by 115% in first year increasing student enrollment
- Increased graduate employment rates by 40%.
- Implemented strategies improving cash collections and revenue generation resulting in an 85% cash collections rate and 90/10 team compliance.
- Improved customer retention rates by 15% in the first 6 months and student satisfaction ratings by 35%.
- Increased employment contacts by 110% with job order to hire conversion rate of 76% through implementation of a new job matching process to better meet employer hiring needs.
- Managed a \$1.6M facility expansion project launching new campus culinary division.
- Responsible for all campus departments coordination and management including: sales, marketing, human resources, community outreach, customer satisfaction and ensuring compliance with regulatory guidelines.
- Lead grassroots marketing campaign generating 15% increase in inquiries.
- Responsible for profit and loss, budgeting, financial planning and business development.
- Managed executive level campus leadership and operations for eight remote educational facilities.
- Realized \$4 M company-wide savings through implementation of standardized organizational structure and procedures in first year.
- Increased social media presence and inquiry generation by 210% through sales and marketing.
- Implemented accountability tools and processes resulting in improved customer retention rates by 25%.
- Developed and launched 7 new educational programs.
- Managed the coordination and delivery of all departmental services across 8 remote locations to include human resources, sales and marketing, fiscal and budgeting, process and procedure development and implementation, customer satisfaction and business development.
- Implemented strategies improving cash collections/revenue with average collections rate of 84%.
- Increased program career placement results company-wide by 76%.
- Responsible for the coordination and management of all fiscal and human resource activities.
- Managed effective relationships and collaboration with all levels of personnel to meet organizational goals and improve process and procedures.

Anthem Education Group, Phoenix, AZ

2009 - 2012

Division Vice President, 2010 – 2012

Director of Operations, 2009 – 2010

- Responsible for the facilitation and support to 14 remote campus locations across the united states in the preparation of required submission of application and self- study reports for initial accreditation with ACICS.
- Responsible for the development and delivery of accreditation training program for 24 campus locations

- Conducted a review and assessment of company compliance with new accreditation standards when making changes to a new accreditor. Lead the corporate and campus teams in development and revision to existing operation policies and procedures to ensure compliance with new requirements.
- Responsible for the delivery of training on ACICS accreditation process for the campus leadership teams in preparation for the transition to this new accreditor.
- Responsible for the coordination and oversight of mock compliance visit teams to ensure the schools were operating in compliance.
- Active participant in the state and national career school associations to include meeting attendance and workshop participation.
- Hand selected by New Jersey Department of Education staff to participate in a meeting to evaluate new proposed rules and compliance with state regulation in relation to accreditation requirements.
- Responsible for working with campus locations to keep abreast of changes in the regulatory environment, new legislation and requirements that had potential impact on business operations.
- Worked with campus leadership and home office support team to develop corrective action plans and monitoring of progress for areas of compliance deficiencies with company, state, federal and/or accreditation compliance.
- Lead corporate support team through policy and procedure reviews and development with collaboration of campus level staff.
- Responsible for curriculum design and development and ensured adherence to state, accreditation and federal regulatory guidelines with 100% compliance.
- Managed \$100M revenue budget and executive team overseeing campus operations and ensuring regulatory compliance, fiscal responsibility and successful talent management for eleven locations.
- Developed purchasing and inventory systems establishing goals and benchmarks resulting in company-wide savings of \$3M.
- Managed effective relationships and collaboration with all levels of personnel to meet organizational goals and improve process and procedure.
- Influenced hiring and training of executive level leadership achieving optimal performance and an executive leadership team retention rate of 86%.
- Responsible for facility and lease management and the purchasing of capital equipment across the organization.
- Managed the coordination and delivery of all departmental services across 11 remote locations to include human resources, sales and marketing, fiscal and budgeting, process and procedure development and implementation, customer satisfaction and business development.

The Chubb Institute/High Tech Institute, Cherry Hill, NJ

2003 - 2009

Associate Vice President, 2008 - 2009

Campus President, 2003 – 2008

- Achieved multiple promotions and guided successful transition of company ownership.
- Lead the campus team through reaccreditation to include self – study development and accreditation visit readiness.
- Responsible for all state and accreditation submissions top include license renewals, annual reporting and periodic update reports as necessary.
- Managed a single campus, promoted into increased responsibility for a network of for-profit educational facilities consisting of 50+ employees per location.
- Responsible for generating targeted sales, customer retention and satisfaction, budgets, profit & loss and regulatory compliance. Increased student population from 190 to 450 students.
- Built strong relations and facilitated communication between school departments, external community relations and state and accreditation regulators.
- Responsible for curriculum design and development.
- Created processes for cohesive school operations and department communication.
- Managed the coordination and delivery of all departmental services to include human resources, sales and marketing, fiscal and budgeting, customer satisfaction and business development.



Accrediting Council
for Independent
Colleges & Schools

POSITION DESCRIPTION

Position: Accounting Manager
Type: Full Time, Exempt
Reports to: President & CEO

Position Summary:

The Accounting Manager is responsible for full range of accounting support functions, from simple accounting tasks to the design and execution of major projects.

Responsibilities:

Accounts Payable –

- Release approved evaluator/staff expense reports in Concur daily
- Process weekly batches of checks/direct deposits for company invoices and reimbursements in (A/P) module of Great Plains (GP)
- Email and return phone calls for evaluators and vendors pertaining to A/P payments on a timely basis
- Reconcile the American Express BTA accounts by applying the Concur expense reports to the Amex payments made in GP
- Ensure that new employees and all evaluators are imported correctly from Personify to Great Plains and that a W-9 form is on file.
- Process the monthly FAR510 refunds
- Send out letters for outstanding A/P checks after 6 months
- Scan W-9 forms for evaluators and vendors into EDM monthly and file in notebook
- Scan stop payment confirmations into EDM
- Ensure the confidentiality of financial and employee files
- Process vendor/evaluator 1099 forms and reports using Greenshades
- Assist with year-end audit

Accounts Receivable –

- Conduct final review and approval of evaluator/staff expense reports according to guidelines daily
- Prepare Credit card reconciliation for purchases made via the web using Personify and Paypal daily
- Perform monthly bank reconciliations
- Run a report to identify all newly accredited institutions that need to be billed prorated sustaining fee invoices.
- Run a report to identify all institutions to be invoiced for a visit during the current visit cycle.

- Run an unapplied cash report, research unapplied items, properly apply the cash to A/R or create a check request for the cash to be refunded.
- Prepare for and assist in the annual financial audit
- Send out collection letters to any institution carrying a balance hitting the 90-day mark signed by the President and CEO.
- Maintain detailed records of all collection efforts to include phone calls and emails.
- Maintain a spreadsheet for all workshops hosted and onsite to include (dates, type of workshop, cost, number of participants, total of payments, and total revenue).
- Generate visit cycle invoice, annual sustaining fee invoices and workshop invoices review and mail.
- Respond to all inquiries on invoices from institutions via email or phone.

Accounting Manger -

- Perform internal month-end close procedures including but not limited to reconciliation of bank accounts and maintenance of schedules and monthly reconciliations for investments and other various general ledger accounts.
- Oversight of all accounting and budgetary functions, including cash receipts, A/R, A/P, reconciliation
- Preparation of monthly financial statements for the President and CEO
- Annual financial audit (will serve as a company contact to an independent auditor)
- Strategic financial input and leadership on issues of contracts and investments
- Asset inventory control

AFR -

- Supervise the collection and analysis of institutional financial data through the Annual Financial Report (AFR)
- Review of audited annual financial reports from ACICS accredited institutions, financial reports submitted in connection with new applications for accreditation, business plans in connection with institutional reorganization and growth, financial information provided through the Department of Education and all other financial/business information that supports accreditation decisions made by the Council
- Monitor cohort default rates
- Serve as the lead source for the Council on financial/business analysis of educational institutions and as Primary Staff Liaison to the Council's Financial Review Committee
- Advise Council on financial and business matters of ACICS accredited institutions, particularly as they relate to sustainability of those institutions
- Advise AID department/Council on financial suitability of institutions aspiring to initial ACICS accreditation or currently accredited institutions considering expansion, change of ownership or control, or other business strategies
- Communicate with member institutions to provide guidance on financial aspects of ACICS accreditation
- Conduct special financial on-site visits as directed by Council

Qualifications:

Position Description
Accounting Manager
Page 3

- Earned bachelor's degree from an accredited institution preferred
- Three years of progressive competence in with accounting processes, procedures and databases
- Two years of experience working in a business office setting, including functional competence with common office equipment, computer technology and software, and office procedures
- Demonstrated ability to prioritize and meet deadlines
- Ability to function effectively in a team environment
- Effective interpersonal, oral and written communications skills
- Integrity in handling sensitive and confidential information

(b)(6)

Employee Signature & Date

Supervisor Signature & Date

2/19

Professional Summary:

Experienced, Hard-working, educated and skilled Accounting Manager with accounting background that spans 20 years. Detail oriented and highly motivated in multi-tasking various accounting responsibilities/tasks. Credentials include: Master's degree in Accounting. System operated include: Solomon, SAGE100, Great Plains, Quick books, Microsoft Office Suite and web-based reporting tools in Member max.

PROFESSIONAL EXPERIENCE

Highland Lake Inn & Resort, Flat Rock, NC

March 2018 – Present

Accounting Manager/HR Manager/Admin

- Responsible for all Human Resource Management duties, including but not limited to Annual Insurance Contract Renewal Negotiations, Interviewing, Employee Retention, Benefit Administration, and Employee Relations.
- Providing support to Owner of Company, including performing various analyses as it pertains to financial matters and/or human resource management.
- Reconcile balance sheet and income statement accounts on a monthly basis (annual revenues of \$4M)
- Responsible for supervision of two employees.
- Prepare month-end close journal entries
- Prepare financial statements monthly
- Responsible for all general ledger entries in SAGE PRO accounting system. Ensuring the accuracy of the general ledger, cash receipts, account receivables, and account payables and other financial records of the organization.

National Alcohol Beverage Control Association, Alexandria VA

November 2011 – March 2018

Accounting Manager of Operations

- Reconcile balance sheet and income statement accounts on a monthly basis (annual revenues of \$11M)
- Prepare month-end close journal entries
- Prepare financial statements monthly
- Responsible for all general ledger entries in SAGE100 accounting system. Ensuring the accuracy of the general ledger, cash receipts, account receivables, and account payables and other financial records of the Association
- Perform monthly reconciliations of NABCA bank account and wire documents
- Assist Director of Finance with various system projects to enhance accounting functions
- Maintain prepaid expenses
- Assist CFO in preparation of the annual budget
- Research and prepare proposals for assisting NABCA with various ongoing projects such as obtaining
- PCI Compliance Certification and improving their current in-house payroll process
- Supervise two accounting staff

- Manage external audit
- Responsible for A/R Collection Activity
 - Prepare sales and use tax filing on a monthly basis
 - Prepare 1099 forms for vendors
 - Maintain petty cash

Crippen Company, Dumfries, VA (Construction Landfill, Waste Mgmt.) June 2007 – November 2011
Assistant Controller

- Prepare financial statements monthly
- Assist in preparation of annual budget.
- Perform monthly reconciliations of the fixed asset accounts, as well as the depreciation and appreciation of such accounts. Implementation of FAS so as to track purchase, disposal, and monthly depreciation costs more efficiently.
- Executed accounts receivable reporting enhancements and reconciliation procedures.
- Provide payroll support.
- Manage accounting operations, accounting close, account reporting and reconciliations.
- Manage annual external audit and prepare year-end closing for audit.
- Supervisory responsibility.
- Prepare yearly 1099 tax forms.
- Responsible for the sales and use tax filings. Preparation of business license renewal and personal property tax returns.
- Prepare and maintain DBR

American Trucking Associations, Alexandria, VA January 2004 – May 2007
Accounting Manager

- Produced the organization's \$45 million revenue financial statements.
- Performed monthly closing process timely and reviewed budget vs. actual variances.
- Supervised the Accounts Payable Specialist and ensured that all duties associated with this function were fulfilled timely and accurately.
- Performed monthly reconciliations of the fixed asset accounts, as well as the depreciation and appreciation of such accounts.
- Reconciled accrued expense/revenue accounts and any prepaid expense accounts.
- Prepared the lease schedules.
- Prepared all of the tax returns for ATA and related companies.
- Ensured all filing deadlines were met on a timely basis and researched and resolved any tax notice discrepancies when received.
- Prepared the yearly 1099 tax forms.
- Prepared and filed all 990 forms, as well as the 990T forms for all entities.
- Prepared and filed all sales and use tax forms on a monthly basis.
- Prepared audit schedules; assisted with other duties relating to the annual audit.

G/L Accountant March 1999 – January 2004

- Performed monthly bank reconciliations of approximately 25 accounts.
- Performed various account analyses.
- Posted journal entries to the general ledger.
- Assisted with the monthly close, as well as the annual audit.
- Responsible for all aspects associated with the TRUCKPAC.
- Served as back-up to the payroll manager.

- Reconciled the investment accounts.
- Installed software to file unclaimed property and followed through in filing the unclaimed property reports when due.

EDUCATION

CPA Candidate

Strayer University, Woodbridge, VA
Masters Degree - Accounting, specializing in Controllershship

Strayer University, Woodbridge, VA
Bachelor of Science Degree - Business Administration



ACCREDITING COUNCIL FOR INDEPENDENT COLLEGES AND
SCHOOLS

POSITION DESCRIPTION

Position: Senior Program Analyst
Type: Part-Time, non-exempt
Reports to: Vice President, Accreditation

Position Summary:

The Senior Program Analyst provides leadership in the review and executive consideration of applications submitted electronically from ACICS member institutions, and researches and evaluates the contents of the application for compliance with ACICS policies and procedures for subsequent action by the Council. The individual presents to the Executive Committee, on behalf of staff, the recommendations for substantive change applications as well as other procedural matters requiring the Council's attention.

Responsibilities:

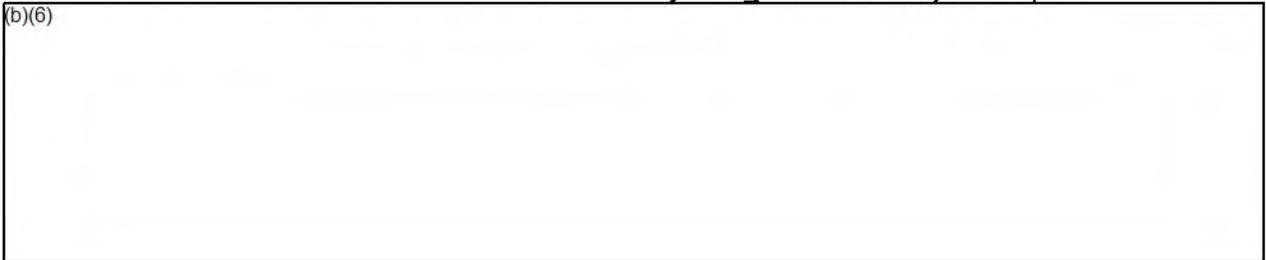
- Prepare and present all materials relevant to a substantive change application for the consideration of the Executive Committee, in their capacity as the Substantive Change Review Committee
- Draft and transmit substantive change action letters following the EC meetings as well as prepare Substantive Change Meeting minutes
- Participate in Policy Review as it relates to Institutional Change processes and procedures.
- Understand the agency's *Accreditation Criteria* as it relates to the specific application processes and provide guidance to other program analyst staff
- Manage the updates made for all Substantive Change actions in the Department's DAPIP portal.
- Provide leadership in the review and revision of the requirements and templates for Applications to ensure currency with ACICS expectations
- Manage the program-level updates in the CRM (Personify) and Member Center to ensure accuracy in all records
- Analyze and evaluate the application with the relevant *Criteria* and procedural expectations and apply policies pertaining to standard requirements for various applications
- Maintain effective communication with institutions concerning the application materials and expectations to ensure a thorough review
- Prepare application review communication to institutions including those needing additional information, approvals, revisions, and denials, as appropriate
- Routinely communicate issues and concerns to the supervisor as needed

- Work in group format, or as needed, to ensure applications are processed within an established timeframe and with the highest degree of accuracy
- Perform other duties as assigned

Qualifications

- Advanced knowledge of ACICS Institutional Change processes and procedures
- Earned bachelor's degree from an accredited institution preferred or at least five years of experience in a professional setting
- Ability to utilize effective spoken and written communication
- Ability to proofread reports and correspondence with attention to details
- Ability to meet specific deadlines and quotas
- Capable of understanding existing accreditation policies and applying them in the analysis of substantive change and non-substantive change applications
- Adequate mathematical ability to verify calculations and formulas
- Knowledge of database systems, including experience in data entry, report management, and security and confidentiality protocol associated with database information

(b)(6)



Terri Jelinek

PROFESSIONAL SKILLS

- Program Management; Strong interpersonal skills; Developing a climate of enthusiasm
- Proficient in Microsoft Office Suite (Word, Outlook, Excel, PowerPoint), Windows and Mac; Skillful in typing
- Proficient at completing research, reporting, and information management within demanding time frames
- Comprehensive support for executive-level staff; Excel at scheduling meetings, coordinating travel
- Excellent communication skills; Outstanding organizational skills; Creative thinking; Highly dependable
- Adept at developing administrative processes that reduce redundancy and achieve organizational objectives
- Superior customer service; Time management skills; Deadline driven; Multi-media experience; Results driven

EDUCATION

Bachelor of Science, Business Management, 2007

W. P. Carey School of Business, Arizona State University, Tempe, Arizona

GPA: 3.6 Magna Cum Laude

PROFESSIONAL PROFILE

USAF Thunderbird's Community Liaison Volunteer

July 2010-Present

- Administered and directed the 2010 back-to-school event with providing over 30 local school children with required supplies and hosting the class with a meet and greet luncheon at Nellis AFB.
- Pioneered the Thunderbird's "Angel Tree" adoption program for underprivileged children.
- Skillfully led 20+ Airmen to execute the Thunderbird's family carnival; largest squadron social event in 10+ years.
- Successfully coordinated and hosted the annual Aviation Nation Hangar Party where 750+ families were entertained.

NextCare Urgent Care Internal Corporate Communications and Media Relations

October 2009-July 2010

- Provided high-level administrative support to the Vice President of Sales and Marketing and created the Vice President's 2010 brand rollout plan that was successfully delivered to over 1000 employees.
- Proactively developed NextCare's entire Target Awards Program, resulting in NextCare winning the highly coveted Better Business Bureau Ethics Award for Business of the Year.
- Coordinated the preparation, planning and follow-up of NextCare's annual sales and marketing meeting.
- Reviewed on a regular basis, NextCare's public relations/sales results and metrics.
- Responded to verbal and written enquiries from NextCare's sales team and the VP of Sales and Marketing.
- Screened, assessed and anticipated workload based on the knowledge of the Vice President's priorities.
- Partnered with Cramer-Krasselt Public Relations to secure over 16 million circulation views and over \$2 million worth of ad value via NextCare's media campaigns in just four months.
- Successfully delivered NextCare's public relations and media campaign to all 6 NextCare markets, 56 medical clinics, and 1000 employees through ongoing communication efforts.
- Established and implemented mechanisms for communication to all employees and medical providers via NextCare's monthly corporate newsletter and intranet.
- Increased employee awareness for upcoming marketing and philanthropic events and encouraged employee participation and volunteer efforts through ongoing internal communication initiatives.
- Managed NextCare's charity program for community relationships with domestic abuse shelters.

NextCare Urgent Care Arizona Outreach Specialist

May 2009-October 2009

- Developed and maintained long-term positive working relationships with diverse targeted audiences including small businesses, large national accounts, insurance payors, physicians, schools, pharmacies, hotels, senior care centers, day cares, gyms, etc.
- Generated leads, managed a sales cycle, and successfully closed sales.
- Provided weekly reporting statistics and communication on both current and upcoming objectives.
- Represented 21 Arizona NextCare Urgent Care clinics at 50,000+ consumer-attended events and health fairs in order to promote NextCare's full-scope of services.
- Assisted in the development and execution of marketing plans and programs, both short and long range, to facilitate the profit growth and expansion of the organization's programs and services.
- Represented the organization to hospitals, plans, practices, local businesses and other referral sources within Arizona.

- Assisted in developing, planning and follow-up of requirements for functions, special events, open houses, orientations, displays, tours, etc.
- Worked to ensure that the local initiatives were accomplished within NextCare's marketing budget.
- Initiated a systematic schedule and process that accomplished quantifiable goals.

MedicAlert Foundation Nonprofit Outreach Specialist

July 2007-May 2009

- Honorably selected as the first outreach representative in MedicAlert's 53-year nonprofit history.
- Developed and implemented key and effective marketing/communication plans for all of Arizona.
- Influenced/counseled case managers, hospital staff, neurologists, endocrinologists, nurses, condition associations, the Alzheimer's Association, and the general public to use and promote MedicAlert and the MedicAlert+Safe Return Program.
- Worked independently from home office to successfully create and execute weekly sales calls and weekly status reports.
- Created a grassroots approach to marketing/sales for MedicAlert Foundation.
- Conducted weekly lectures, presentations to key decision makers/general public that helped drive MedicAlert's sales.
- Averaged 7+ physician office stops/calls each day while continuously promoting MedicAlert's life saving services.



ACCREDITING COUNCIL FOR INDEPENDENT COLLEGES AND SCHOOLS

POSITION DESCRIPTION (May 2017)

Position: Senior Coordinator, Accreditation Compliance
Type: Full-Time, Exempt
Reports to: Manager, Policy & Institutional Compliance

Position Summary:

The Senior Accreditation of Accreditation Compliance, in the Department of Accreditation, serves as a primary staff in the review and oversight of processes affected by conditioning or adverse Council actions, as well as in the management of campus and institutional closure in a manner consistent with the expectations of the *Accreditation Criteria* and the U.S. Department of Education. Further, this individual is an experienced member of the Accreditation staff with strong understanding and interpretation of the *Accreditation Criteria* to support in-depth work in policy development and review, coordination of the Intermediate Review Committee, support of the institutional review panels, and the Council meeting deliberations.

Responsibilities:

Institutional Compliance (75%)

- Manage and monitor the campus/institutional closure application process to ensure timeliness and thoroughness of review.
- Review and approve teach-out agreements and plans to ensure compliance with the *Accreditation Criteria* and Council's expectations.
- Manage the Review Board of Appeals process to include the coordination of any cases.
- Manage the recording and review of show-cause directives and adverse actions.
- Work with management on the drafting and preparation of formal Council communication.
- Provide support and guidance to institutions concerning campus closures, teach-out agreements, responses to show-cause directives, and other related accreditation matters.
- Support the leadership team in the acknowledgement of institutional withdrawal from ACICS accreditation and other accreditation-affecting reviews.
- Recommend, following appropriate review, intent to bar actions to the Council based on evaluation of institutional closure proceedings.
- Manage external requests for information on accreditation status, institutional closure, and other ACICS actions, to all constituents.
- Manage the public notification of relevant accreditation actions including the web site notices of adverse and conditioning actions.
- Update institutional and other stakeholder information in the database to ensure accuracy and currency.
- Coordinate onsite visits, as assigned.
- Other responsibilities as assigned.

Policy Review & Council Support (25%)

- Assist in the research and development, editing, and delivery of policy materials for the Policy meeting and subsequent Council meetings.

- Support the review and preparation of findings from institutional submission of Campus Accountability Reports, Retention and Placement Improvement Plans, and Interim Accountability Reports.
- Work with the manager of institutional compliance on the coordination and oversight of the Intermediate Review Committee.
- Assist the Manager of Institutional Compliance with the preparation for Council meetings to include file review assignments, meeting minutes, and accurate recording of decisions.
- Serve as Council committee liaison, as assigned.
- Other responsibilities as assigned.

Qualifications:

- Earned bachelor's degree required
- Above average understanding of ACICS standards and accreditation criteria
- Experience and proven success with the coordination of evaluation visits
- Analytical skills pertaining to institutional compliance issues
- Demonstrated ability to prioritize and meet deadlines
- Ability to function effectively in a team environment
- Effective interpersonal, oral, and exceptional written communications skills
- Integrity in handling sensitive and confidential information

(b)(6)

Employee Signature & Date

Supervisor Signature & Date

CATHY KOUKO

SUMMARY:

Dedicated professional with 10+ years experience in customer service, accounting and administration. Demonstrated project management and interpersonal skills. Strong organizational ability and an excellent record of completing projects according to deadlines. Adaptable and quick learner able to work on own initiative and as a team towards achievement of company's goals and objectives.

CORE COMPETENCIES AND TECHNOLOGY SKILLS:

- Ability to multitask and prioritize
- Ability to deal with confidential material
- Ability to arrange complex travel & accommodations
- Excellent analytical and problem solving skills
- Typing Speed: 55wpm
- Quick Books & ADP Payroll
- MS Office applications: Word, Excel, Outlook, PowerPoint and Access

PROFESSIONAL EXPERIENCE:

Education Assistant/Project Coordinator

NCBFAA, Washington, DC

July 2012 – April 2013

- Edited the educational database achieving 95% accuracy thereby reducing cost
- Implemented a spreadsheet program for educational credits shortening the posting period
- Participated in the development and initiation of a five-year educational project to get accredited
- Initiated and wrote the education policy and procedures manual
- Provided customer service to association members via phone, fax & email
- Managed department accounts receivables & reconciliations
- Prepared department BOD accounting reports and account analysis
- Edited and updated the educational website
- Prepared and proofread marketing materials
- Assisted with special projects as assigned by the Educational Director

Executive Secretary

September 2011 – May 2012

Helena's House Inc, Upper Marlboro, MD

- Designed and executed an Inventory system cutting costs
- Streamlined daily office operations improving efficiency
- Scheduled and conducted preliminary job application process
- Scheduled staff in the five residences
- Managed correspondence with individual families, company vendors and suppliers
- Managed the appointment calendar
- Prepared meeting notices and agendas
- Maintained office supplies and inventory
- Provided administrative support to the President

CATHY KOUKO

Contractor Accounts Associate

July 2005 – April 2011

Tri-state Home Health Agency, Washington, DC

- Eliminated over six months backlog of contractors' invoice payments to the tune of 1000 invoices per month
- Revised forms and procedures to improve efficiency and accuracy by 80%
- Reviewed all contractor invoices and verified that they complied with Medicaid policies and procedures
- Audited medicaid billing claims
- Resolved contractors' complaints, invoice discrepancies and escalated when necessary
- Prepared contractor accounts payable and assisted with employee payroll
- Provided support to the CFO as needed

VOLUNTEER WORK

Omega Gospel Mission, Washington DC

February 2008 – October 2012

- Coordinated meetings and conferences
- Coordinated travel arrangements and catering
- Managed correspondence with guest speakers and attendees
- Prepared meeting material

EDUCATION:

MBA - Project Management, Grantham University, Kansas City, MO - December 2014

Certified Hospitality Professional (CHP) & Certified Hospitality Supervisor (CHS), American Hospitality Academy, Orlando, FL

BS, Hotel and Restaurant Management, Alliant International University, San Diego, CA .



Accrediting Council
for Independent
Colleges & Schools

POSITION DESCRIPTION

Position: Accreditation Coordinator
Type: Full Time, Exempt
Reports to: Vice President of Accreditation

Position Summary:

The Accreditation Coordinator is a member of the Accreditation team whose primary function is to serve as a liaison between ACICS and institutions during the evaluation processes. Additionally, the Coordinator is the ACICS representative who works most closely with, serves as a resource for, and acts as liaison to member institutions and evaluation teams. The Accreditation Coordinator focuses on the evaluation visit processes, for different assessment of compliance – initial, renewal, and quality assurance monitoring. The Coordinator must understand and be able to apply Accreditation Criteria; review and edit team reports, orange sheets, and motion letters; and coordinate a number of accreditation visits, as assigned.

Responsibilities:

- Gain a clear understanding of ACICS accreditation standards and how they are applied to various types of institutions
- Provide support services to institutions as they seek various approvals from ACICS for any institutional changes affecting their maintenance of accreditation status with ACICS
- Coordinate on-site evaluation visits to institutions including securing evaluators for visits and arranging lodging, food, and travel
- Prepare professional correspondence in connection with each visit and finalize team reports
- Review, update, classify, and arrange for archiving of institutional files in the electronic data management system for future reference
- Prepare formal notifications of Council actions to institutions
- Perform support functions for committees and subcommittees, as assigned
- Prepare for and attend Council Meetings
- Other responsibilities as assigned

Qualifications:

- Earned bachelor's degree; relevant graduate degree preferred
- Creditworthiness
- Ability to coordinate and manage personal travel expenses and authorized travel expenses for evaluation team members
- Desire and ability to travel extensively as required
- Valid driver's license and clean driving record

- At least two years of experience working in a project management setting, including functional competence with common office equipment, computer technology and software, and office procedures
- Demonstrated ability to prioritize, organize and meet deadlines
- Ability to build a team and function effectively in a team environment
- Effective and professional interpersonal, oral and written communications skills
- Integrity in handling sensitive and confidential information
- Ability to work with more than one functional manager in the management of each project

(b)(6)

E

Andre McDuffie, MS, SHRM-CP, aPHR

Education

State University of New York at Stony Brook | Stony Brook, NY **August 2016**
Masters of Science in Human Resource Management

State University of New York at Geneseo | Geneseo, NY **May 2011**
Bachelor of Art in Communication

Certifications

Society for Human Resource Management (SHRM) **December 2016**
Society for Human Resource - Certified Professional (SHRM-CP)

HR Certification Institute (HRCI) **August 2016**
Associate Professional in Human Resources (aPHR)

Professional Experience

Accrediting Council for Independent Colleges and Schools (ACICS) | Washington, DC **April 2013 - Present**
The largest national accrediting organization of degree granting institutions that offer programs in professional, technical, and occupational fields.

HR Generalist (July 2016 – Present)

Responsible for the day-to-day management of HR operations including the administration of organizational policies, procedures, and programs; administer and guarantee benefit plans are in accordance with federal and state regulations; oversee payroll to ensure all federal, state, and local laws are adhered.

Achievements:

- HR representative for organization while performing duties concurrently with Accreditation Coordinator role
- Served as a member of the HR Certification Institute (HRCI) Standard Setting Panel to help with the creation and the implementation of the Associate Professional in Human Resources (aPHR) certification exam
- Worked with the Vice President, and other team members of Information Technology to integrate the payroll information collection into office intranet system
- Successfully converted all Human Resource files and documents into electronic format records that were uploaded into company's SharePoint HRIS system

Accreditation Coordinator (December 2017 – Present)

Provide support services to institutions as they seek various approvals from ACICS for any institutional changes affecting their maintenance of accreditation status with ACICS; conduct each site visit as a separate project and perform all activities as specified by ACICS to complete each project.

Achievements:

- Coordinated on-site evaluation visits across the country with teams of subject matter experts
- Solid project management skills scheduling visits, building teams, handling lodging, food, transportation, and serving as ACICS representative while on site at institutions

Senior Human Resources Coordinator (June 2015 – July 2016)

Onboard new hires by providing education and training on company policies and procedures through manuals, handbooks, and presentations; processed all enrollments into the wellness and wellbeing benefits. Processed updates and terminations to the benefits plans; administered the 403B and 401A retirement plans; submitted all retirement contributions and loan payments on behalf of employees.

Achievements:

- Created and implemented a disaster contingency plan
- Served on the Quality Control Committee for organization to ensure ACICS' written and digital communications and reports had no grammatical errors

Administration Coordinator (April 2013 – June 2015)

Performed full cycle recruitment for all internal openings; assisted in the execution of Annual Conference and State Association events; acted as building tenant liaison.

Achievements:

- Recruited and filled positions ranging from executive to entry level roles
- Managed two summer interns



ACCREDITING COUNCIL FOR INDEPENDENT COLLEGES AND SCHOOLS

POSITION DESCRIPTION (September 2015)

Position: Accreditation Content Editor
Type: Full-Time, Exempt

Position Summary:

The Accreditation Content Editor applies Council policies and procedures in editing, disseminating, and storing various types of accreditation-related content and actions. These materials include, but are not limited to, evaluation visit reports, Council motion letters, and communications with the field. In addition, the position is responsible for maintaining and updating guidance documents related to visits, motion letters, applications, other communication materials to align with current Council policies and procedures.

Responsibilities:

- Oversee the editing, dissemination, and electronic storage of on-site visit team reports with the assistance of other staff, contract editors, and Senior Manager, Compliance.
- Assist with the editing, dissemination, and electronic storage of motion letters and notification letters communicating Council actions, and accurate publication of Council actions on the ACICS website.
- Assist with the notification of Council actions to institutions, other agencies, and the general public in collaboration with the Office of the President.
- Oversee the production (in collaboration with the IT department) and dissemination of the Certificate of Accreditation and Certificate of Honor Roll awards.
- Oversee the development, maintenance, and standardization of visit report templates, motion letter templates, editing guidelines, memo templates, application templates, and other communication materials to align with Council policies and procedures.
- Oversee the development and maintenance of the Council File Review process through the electronic storage system.
- Analyze, summarize, and report out on team visit report information and data.
- Serve as quality control liaison for Accreditation and Institutional Development Department.
- Assist with production and editing of Council meeting minutes and communications to the field.
- Collaborate with Senior Manager, Compliance and Vice President- Accreditation Operations in developing, reviewing, updating and maintaining the ACICS Policies and

Procedures Manual that is in compliance with the Department's regulations and Council policies.

- Other responsibilities as assigned by immediate supervisor.

Qualifications:

- Earned bachelor's degree from an accredited institution; master's degree preferred
- Two years of experience in accreditation or other related activities
- Excellent demonstrated ability in writing and editing professional letters and reports
- Two years of experience working in a business office setting, including functional competence with common office equipment, computer technology and software, and office procedures
- Demonstrated ability to prioritize and meet deadlines
- Ability to build a team and function effectively in a team environment
- Effective interpersonal, oral, and written communications skills
- Integrity in handling sensitive and confidential information

Reports to:

Senior Manager, Compliance

Supervises:

None

(b)(6)

David J Moser

PROFILE

Extensive pedagogical and andragogical experience as a language instructor, writer, editor, facilitator, curriculum developer, and manager in the US and abroad. Proven results in furthering subject matter acquisition and retention. Strong work ethic, able to take initiative and work with limited supervision as a team leader or member. Exacting editor and writer able to present complex concepts clearly and concisely. Bilingual in English and Spanish, with additional language studies in Latin, German, French, and Russian.

EXPERIENCE

04/2018 – Present Freelance Language Consultant

- Edit material written for scholarly journals which has been translated into English
- Design and develop contextualized English language teaching material, synthesizing job-specific vocabulary and phrasing with Bloom's Taxonomy and Quality Matters Standards

01/2016 – 04/2018 Curriculum Developer, UDC Community College

- On a TAACCCT grant from the US DOL, applied the ADDIE cycle to fully re-design and develop existing health care curricula content, training materials, training modules, and instructional aids for face-to-face, hybrid, and online teaching and learning, while incorporating contextualization and accelerated learning strategies to include literacy, numeracy, and soft skills
- Maintained course content master files, incorporating student and instructor feedback from end-of-course surveys into the quality assurance and course maintenance processes
- Conducted professional development workshops – including face-to-face, online, and web-conference sessions – for faculty and staff on curriculum best practices, implementation, and other relevant topics
- Contributed to an overall increase in course retention rates from 48% to 70%, and of certification exam results from 27% to 86% above the national average

10/2014 – 06/2015 Adjunct Faculty – ESL, Prince George's Community College

- Designed, developed, and facilitated "American English Pronunciation and Fluency" for Washington Suburban Sanitary Commission employees, and "Introduction to Spanish" for PG County Department of Social Services employees
- Received a 95% approval rating as "well prepared, knowledgeable, effective and responsive" from students in Introduction to Spanish course

10/2008 – 04/2014 ESL Facilitator, Southern Management Corporation

- Applied the ADDIE cycle to develop and facilitate a multi-level ESOL program for SMC employees
- Incorporated contextualized learning to include training material relevant to the job descriptions and responsibilities of SMC employees
- Created and maintained course content master files and student outcome data files to be shared with Property Managers, Training Coordinators, and Southern Management University Dean

01/2007 – 04/2008 Writer/Editor, Expert Editions, Inc.

- Collaborated with a large team of bilingual writers, editors, and educators to write/edit the K-6 Teacher Edition for McGraw-Hill SRA's basal reading program, *Imagine It!* © 2008
- Vetted final manuscript with compositor, ensuring strict alignment with CA standards

10/2005 – 03/2006 Project Manager, Advanced Language Systems International

- Managed the creation of a multilingual translation test for use by the IRS
- Created four 100-question multiple-choice tests for Spanish component of test

10/1994 – 06/2007 English Language Trainer, World Bank

- Designed, developed, and facilitated courses in intensive English grammar, communication skills, and technical writing for Bank staff, economists, and executive directors

09/1988 – 06/1992 English Instructor, Video Idiomas, S.A.

- Designed, developed, and instructed English courses for employees of Banca March, Sol-Melia Hotels, Hotel Los Loros, Europcar, Sociedad Anonima de Autores, PepsiCo, and Bristol-Myers, Squibb in Madrid, Palma de Mallorca, and Ibiza, Spain

09/1987 – 06/1988 English Instructor, Centro Afuera, S.A.

- Developed and instructed English courses for junior and senior high students in Madrid, Spain

EDUCATION

BA, Beloit College: Classical Civilization/Philology

TRAINING & CERTIFICATES

- Online Teach-Only Capstone (2017)
- Online Learning Consortium (OLC): Essentials Part 1 (2017)
- Quality Matters: Independent Applying the QM Rubric (2017)
- Blackboard Collaborate Ultra (2017)
- CASAS: eTests Online Proctor, Coordinator (2016)
- American University TESOL Tactics & Techniques Pronunciation Workshop (2012)

PRESENTATIONS

- March 2018: League for Innovation National Conference, National Harbor, MD “Contextualized Learning for Workforce Students in the Healthcare Pathway”
- March 2018: COABE National Conference, Phoenix, AZ “Integrating Contextualized Learning and Soft Skills to Enhance and Advance Healthcare Career Programs”



Accrediting Council
for Independent
Colleges & Schools

POSITION DESCRIPTION

Position: Senior Systems Manager
Type: Full Time, Exempt
Reports to: President & CEO

Position Summary:

The Senior Systems Manager (SM) is responsible for providing technological expertise and support of all ACICS IT solutions. The SM serves all the ACICS staff, performing a full range of technological functions, including on-site troubleshooting, systems and interactivity design, and system maintenance. He/she should proactively evaluate new systems, enhancements and products to determine capability, functionality, integration, cost, and appropriateness for supporting both current and future operations. This includes coordinating with suppliers of hardware and software platforms, equipment, and machines, technical and professional services. The SM is also responsible for the security system and video surveillance.

Responsibilities:

- Design, deploy, monitor, maintain, upgrade, and support new and existing Windows based network; this includes hardware, software, and peripherals, including storage area networks and backup infrastructure
- Management and understanding of VMware hosts, virtual machines and 3rd party plugins
- Monitors systems, servers and equipment for performance, security and stability
- Manage client-server applications, cloud-based applications, and LAN/WAN connections
- Manage Accreditation Management System including document management and content management systems
- Assist with the planning, purchasing, installation, maintenance and control of computer related hardware and software throughout the organization
- Manage external vendors and suppliers
- Participate in the IT Change Management and Asset Management processes
- Manage Active Directory, user accounts, passwords, mailboxes, database, file level permissions
- Provide training on an as needed basis on a variety of IT topics to staff, such as Microsoft Office, proper network usage, and new technologies
- Maintain inventory of all office production, computer equipment and related software
- Review all necessary IT related invoices to ensure proper charges apply
- Oversight of accounting and budgetary functions
- Prepare monthly financial statements for the President and CEO
- Serve as contact to independent auditor for the Annual Financial Audit
- Prepare 1099's

Position Description
Senior Systems Manager
Page 2

- Assist AID Analyst to coordinate, collect, monitor, and prepare data from institutional submission of Campus Accountability Reports (CAR)
- Develop reporting tools for AID Analyst to review and analyze CAR and PVP data to verify numbers and identify inaccuracies
- Assist with Council Meeting and IRC preparation
- Assist with workshop, meeting, and event preparation, as needed
- Supervise IT Support Specialist
- Manage the A/P and A/R process and staff persons, providing assistance and guidance
- Available to work on-call support as necessary
- Such other responsibilities as assigned

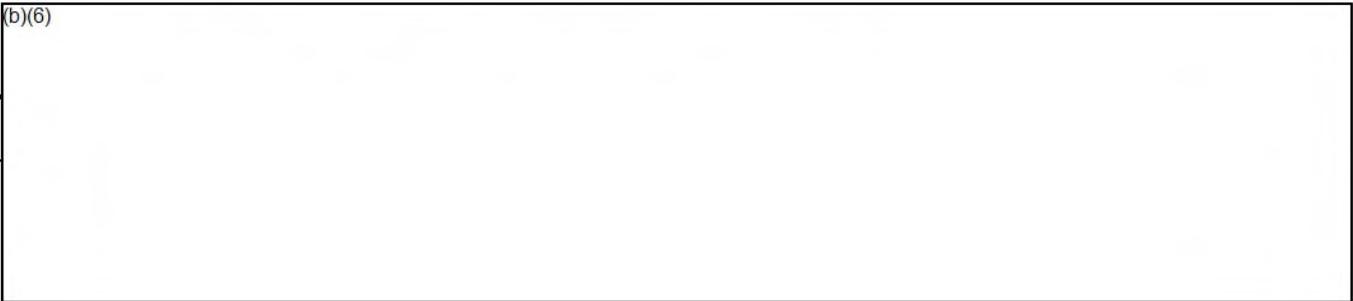
Proficient with:

VMware, Microsoft Server and Desktop OS, AppAssure, Backup Exec, Remote Desktop, VPN, Firewalls, SharePoint, Microsoft Azure, Active Directory, Great Plains, BI360 Budgeting and Reporting

Qualifications:

- Training and expertise in computer technology, networking, systems administration, interactivity, software, communications, and office procedures required.
- Professional dress and demeanor
- The ability to prioritize and meet deadlines
- Ability to function effectively independently as well as in a team environment
- Exercise of independent judgment
- Problem-solving skills, and
- Excellent interpersonal, oral and written communications skills also required.
- Degree preferred, but not required.
- Ongoing professional development required.
- IT Certifications desired in Microsoft, VMware or Cisco

(b)(6)



SR SYSTEMS ARCHITECT

Senior Solutions architect adept at designing and implementing effective technical business solutions. Advanced levels of technical knowledge combined with sound business vision and project management skills. Exceptional problem-solving and written and verbal communication skills, with broad understanding of SQL databases, constituent management, financial management, and related applications. Enjoy leading teams to deliver end-to-end solutions to customers.

- Experience**
- Sept 2014–Present *Accrediting Council for Independent Colleges and Schools* Washington, DC
Sr. Systems Architect
- Review and advise on use and configuration of ACICS’s systems architecture, including a wide range of foundation technology such as server and storage virtualization, performance analysis and management, and enterprise infrastructure monitoring.
 - Participate in the discovery, documentation and refinement of business requirements to ensure alignment with technically viable solution designs.
 - Work with functional subject matter experts to collect and describe both current and future capabilities, operational activities, system functions, business processes, operational and system performers, and associated data and attributes.
 - Identify and analyze alternative system solutions considering costs, risks, and benefits, as well as system performance, usability, scalability, reliability, and maintainability.
 - Responsible for definition and improvement of software development methodology and processes.
 - Identify technical risks and provides mitigation strategies.
 - Oversee the financial, membership, and accreditation system activities including EDM/Millennium document management system, Website/Ektron content management system, eBusiness/Commerce systems and Sharepoint.
 - Responsible for full range of accounting support functions, from simple accounting tasks to the design and execution of major projects and administration of financial application (Great Plains).
 - Responsible for developing applications and reports to analyze the quality and completeness of all financial and business information and reports submitted to ACICS by member institutions.
 - Work with VP of Finance on overseeing all accounting and budgetary functions, including A/R and A/P reconciliation, calculation and billing of annual sustaining fees, grant renewals, and visit deposits.
- Sept 2007–Sept 2014 *Bryant Business Solutions* Millersville, MD
Owner/Operator
- Manage all phases of day to day operations of company. Direct financial management and company development.
 - Provide consulting services for the project management, implementation, training and ongoing support of Association Management System, Financial Systems and products.
 - Develop ongoing integrations from 3rd party products into business software applications.
 - Perform classroom and one-on-one training on AMS modules and tools
 - Complete full-scale conversion programming from legacy systems into new formats utilizing SQL programming.
 - Develop, program, test and implement complex stored procedures, triggers and processes as needed to satisfy client requirements.
 - Compile advanced reporting tools utilizing SQL, Crystal, Access and software specific programs to deliver required reports, extracts and data analysis.
 - Install, configure and document backend software to support the implementation including but not limited to: NT, SQL, SSIS, ETL, Business Objects Server, Great Plains, Quickbooks, Concur, Personify, BizTalk, Scribe and BI360 software.
- July 2001–Sept 2007 *Intuitive Business Concepts, LLC* Columbia, MD
Managing Member
- Manage all phases of day to day operations of company. Direct financial management and company development.
 - Provide consulting services for the project management, implementation, training and ongoing support of iMIS Association Management System and products.
 - Develop ongoing integrations from 3rd party products into iMIS applications.
 - Perform classroom and one-on-one training on iMIS modules and tools
 - Complete full-scale conversion programming from legacy systems into new formats utilizing SQL programming.
-

- Develop, program, test and implement complex stored procedures, triggers and processes as needed to satisfy client requirements.
- Compile advanced reporting tools utilizing SQL, Crystal, Access and software specific programs to deliver required reports, extracts and data analysis.
- Install, configure and document backend software to support the implementation including but not limited to: NT, SQL, Cold Fusion, IIS, and Crystal Info Server.

April 1996–July 2001

Aronson Consulting, Inc.

Rockville, MD

Senior Technical Consultant

- Senior Technical Consultant certified in iMIS, a customer relations management, web and content management tool for the Association industry.
- Completed full-scale conversion programming from legacy systems into new formats utilizing advanced SQL programming.
- Developed, programmed, tested and implemented complex stored procedures, triggers and processes as needed to satisfy client requirements.
- Compiled advanced reporting tools utilizing SQL, Crystal, Access and software specific programs to deliver required reports, extracts and data analysis.
- Installed, configured and documented backend software to support the implementation including but not limited to: NT, SQL, ColdFusion, IIS, and Crystal Info Server.

1992–1996

Jackson and Tull

Seabrook, MD

Finance Manager

- Managed employees in the financial unit of the Aerospace Engineering Division.
- Developed proposals in response to government and commercial RFPs.
- Developed financial procedures and directives to ensure acceptable and sound fiscal planning and control.
- Developed and monitored the execution of the financial program; reviewed and analyzed contract program objectives and the effective utilization of contract funds; developed maintained and monitored financial reporting and accounting system.
- Prepared contract budgets; developed expense projections; and was responsible for the processing, preparation, administration and control of \$260+ million in NASA contracts.

1989–1992

Jackson and Tull

Gaithersburg, MD

Senior Financial Analyst

- Coordinated all submissions into a consolidated budget and financial forecast.
- Prepared and issued regular and special reports including NASA/GSFC Form 18-42's and NASA Form 533Ms.
- Reconciled all cost and budget data with accounting system.
- Prepared estimates for cost proposal; developed and maintained financial procedures to monitor expenditures of labor, overhead, materials and other costs on project activities.
- Conducted special studies and analyses of financial practices and procedures and documented recommendations to promote efficiency in the area of financial management.
- Monitored the status of costs versus budgets to prevent cost overruns; compared costs to total budget and to milestone schedules; reviewed and audited operating budgets periodically to analyze trends affecting budget needs. Maintained financial records of operation and compiled manpower and material cost estimates.

Technical Skills

Applications/Programming Tools:

Microsoft SQL, MSDE, Sybase, Cold Fusion, IIS, Microsoft Word, Excel, Access, MS Project, PowerPoint, Great Plains, Solomon, MAS90, Quickbooks, Crystal Report Writer, iMIS, Personify, BI360, Concur, and SharePoint.

Education/ Training

University of Maryland, College Park, MD

- Management Information Services
- Howard Community College, Columbia, MD
- Business Management/Finance

References Available on Request



ACCREDITING COUNCIL FOR INDEPENDENT COLLEGES AND
SCHOOLS

POSITION DESCRIPTION

Position: Program Analyst I
Type: Full Time, non-exempt
Reports to: Vice President, Accreditation

Position Summary:

The Program Analyst reviews applications submitted electronically from ACICS member institutions, and researches and evaluates the contents of the application for compliance with ACICS policies and procedures for subsequent action by the Council.

Responsibilities:

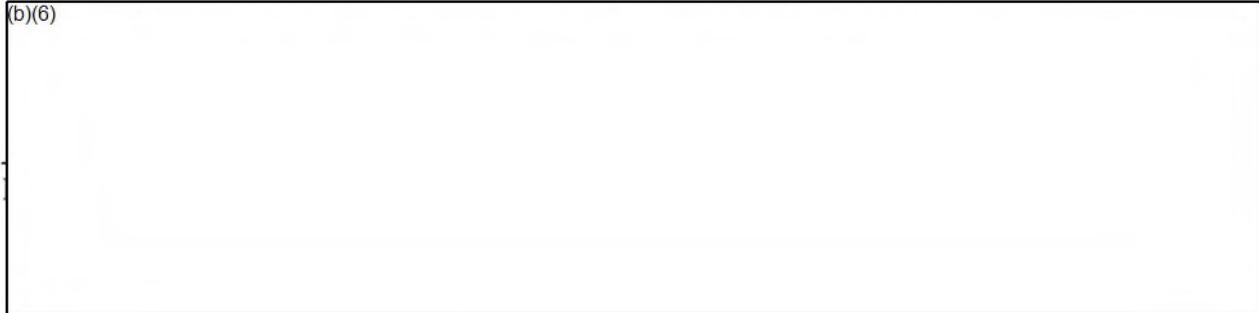
- Understand the agency's *Accreditation Criteria* as it relates to the specific application processes
- Verify institutional compliance with all applicable standards in part of the review of the application submission
- Analyze and evaluate the application with the relevant *Criteria* and procedural expectations and apply policies pertaining to standard requirements for various applications
- Maintain effective communication with institutions concerning the application materials and expectations to ensure a thorough review
- Produce weekly reports on the status of applications approved, in-process and not yet reviewed, and in-process and waiting for additional information from the member institutions
- Prepare, as needed, all materials relevant to a substantive change application for the consideration of the Executive Committee, in their capacity as the Substantive Change Review Committee.
- Prepare application review communication to institutions including those needing additional information, approvals, revisions, and denials, as appropriate
- Routinely communicate issues and concerns to the supervisor as needed
- Work in group format, or as needed, to ensure applications are processed within an established timeframe and with the highest degree of accuracy
- Perform other duties as assigned

Qualifications

- Earned bachelor's degree from an accredited institution preferred or at least five years of experience in a professional setting
- Ability to utilize effective spoken and written communication

- Ability to proofread reports and correspondence with attention to details
- Ability to meet specific deadlines and quotas
- Capable of understanding existing accreditation policies and applying them in the analysis of substantive change and non-substantive change applications
- Adequate mathematical ability to verify calculations and formulas
- Knowledge of database systems, including experience in data entry, report management, and security and confidentiality protocol associated with database information

(b)(6)



Shaniqua Y. Smith

Objective: I plan to earn a degree in business management and with that develop a chain of privately owned businesses, including restaurants and childcare facilities.

ACICS **July 2008- Present**
(Accrediting Council
For Independent Colleges
And Schools)
Washington, DC 20002

As an administrative temp my responsibilities include scanning records, demonstrating the use of industrialized scanners. Other responsibilities include, organizing membership databases, preparing box numbers for scanning and filing purposes, filing, and copying documents needed for databases. During this process I type documents and correspondence from handwritten material or other draft documentation. I have mastered all new skills being taught.

ACICS **June 2007- August 2007**
(Accrediting Council
For Independent Colleges
And Schools)
Washington, DC 20002

As an administrative temp I organized membership databases, filed newly submitted correspondence and other documents. Typing documents and correspondence from handwritten material or other draft documents was also included in my line of work. I expeditiously completed all tasks assigned.

Smoothie King **July 2005- January 2007**
College Park, MD 20740

As a shift leader I supervised fellow workers, provided superior customer service skills in a timely manner, opened and closed the store, operated the cash register, took orders, prepared smoothies, maintained store cleanliness, restocked as necessary, washed dishes, book keeping, and bank transactions.

On a voluntary basis I decorated the store for the holiday season(s).

I received \$100 dollars on three different occasions for solely earning 100% on mystery shops.

Education:

TC Williams High School, High school diploma (spring, 2007)
Cheyney University of PA (fall, 2007)

Volunteer: **fall 2005 - spring 2007**

Mount Vernon Elementary School- Taught and helped young children to read during an after school program.

TC Williams High School- After school I stayed to clean classrooms. During lunch break on occasion I would help out in the office, screening calls, greeting visitors and parents, and answering phone calls.

Software:

- Microsoft Excel
- PowerPoint
- Word Perfect

Hobbies/Personal

- Reading
- Writing
- Online Exploring
- Member of the FBLA



ACCREDITING COUNCIL FOR INDEPENDENT COLLEGES AND SCHOOLS

POSITION DESCRIPTION

Position: Manager of Policy & Institutional Compliance
Type: Full time, exempt
Reports to: Vice President - Accreditation

Position Summary:

The Manager of Policy & Institutional Compliance is responsible for the overall management of those processes that affect Council decision making, including the policy review process, the Intermediate Review Committee, and Council sessions. These processes include critical areas of institutional compliance including administration of the ACICS Placement Verification Program (PVP) process, preparation of formal communication to institutions on behalf of the Council (team reports, teach out/campus closure letters, Council action letters, etc.), and providing relevant webinars and informational sessions to all constituents.

Key Responsibilities:

Policy: 25%

- Oversee the regular and systematic policy development, review, approval, and implementation processes
- Develop a system to enhance and improve the involvement of all constituents in policy review and drafting.
- Track and manage the research of policy issues in higher education as they relate to ACICS and its standards
- Coordinates the assignment for the research, review and drafting of policy items for the Council's consideration.
- Manages the preparation and publication of policy items at the Council meetings, along with the recording of actions and meeting minutes for follow up and final action.
- Works with leadership on the preparation and communication of the *Memorandum to the Field* as well as the hosting of the *AWARE*.

Institutional Compliance: 25%

- Oversees the collection and reporting of information through the ACICS Annual Financial Reports (AFR) and Campus Accountability Report (CAR) to identify trends for policy consideration as well as to ensure institutional compliance.
- Manages the implementation and review of the Placement Verification Program (PVP)
- Develop procedures to streamline the PVP to ensure consistency and institutional compliance.
- Develop guidance documents and training for staff and the institutions concerning the reporting of placement information, including presentations, webinars, and manuals.
- Provide guidance to critical stakeholders including staff, institutions, and state agencies, on institutional expectations on the placement verification program.

- Manage all Council actions related to institutional compliance including student achievement, the PVP, and periodic reviews.

Council Oversight: 50%

- Manages the tracking, preparation, and final communication of team reports to campuses undergoing review
- Oversees the receipt and preparation of institutional responses to inform the Council's decisions
- Manages the application, selection and oversight of the Intermediate Review Committee (IRC) to ensure compliance with ACICS and USDE regulations
- Works with leadership to assign institutional files for commissioner review as well as staff-liaison assignments
- Coordinates the file review process of the Council and manages the final review by the Council on every decision
- Works with the President to ensure the accurate and timely preparation of Council decision letters
- Prepares the Council Action Report for communication the USDE and for public notice
- Oversees the regular policy development, review, and approval process for ACICS to include staff and committee assignments, Policy Binder preparation, and final action.
- Manages staff policy review and staff policy and procedures workday
- Compiles, edits, and publishes the *Memo to the Field*
- Develops and facilitates the *AWARE* webinars as well as other webinars related to institutional compliance (Student Achievement, CAR/PVP)
- Manages the drafting, compilation and publication of minutes for the Council and its Committees

Qualifications:

- Earned bachelor's degree, master's degree preferred
- Advance knowledge of accreditation and compliance
- Ability to manage and coordinate multiple tasks
- Experience with web-based data entry forms and procedures, running database application reports, and performing back-end administrative tasks
- Demonstrated ability to organize and develop systems for tracking, prioritizing and meeting deadlines
- Ability to supervise and to build and function effectively in a team environment
- Effective interpersonal, oral and written communications skills
- Integrity in handling sensitive and confidential information

(b)(6)

Karly S. Smith

PROFESSIONAL OBJECTIVE:

To obtain a challenging position that will allow me to utilize my strong organizational and communication skills, my educational background, and my ability to work well with people.

PROFESSIONAL SKILLS and QUALIFICATIONS:

- Strong oral and written communication skills
- Highly organized with detailed planning skills
- Proficient with Microsoft Office
- Excellent interpersonal skills
- Flexibility within various circumstances and environments
- Open-minded to new ideas and experiences
- Self-starter with solid time-management
- Basic conversation skills in Mandarin Chinese and Spanish
- Knowledge of international corporate and educational structures
- Strong work ethic in both individual and team settings

EDUCATION and CERTIFICATION:

Bachelor of Science in Unified Elementary and Special Education May 2005

Keuka College, Keuka Park, NY

Concentration in Family and Child Studies GPA: 3.6, Graduated *Cum Laude*

License: Maryland State Elementary Education (Grades 1-6) and Special Education (Grades 1-8)

EMPLOYMENT EXPERIENCE:

Program Coordinator of Education (Temporary)

Envision, EMI, National Youth Leadership Forum on Medicine

Vienna, VA April 2010-August 2010

- Oversaw educational programs of 400 students
- Hired, trained and managed 23 staff members
- Addressed and resolved scholar/parent/staff concerns and conflicts
- Organized curriculum and supervised implementation
- Completed various tasks in a fast-paced environment and under strict deadlines to ensure program success
- Conducted meetings and presentations for staff and conference attendees

English as a Foreign Language Teacher (Jr. & Sr. High)

Taichung City Public Schools

Taichung, Taiwan, September 2007-January 2010

- Designed curricula for varied levels and abilities
- Trained adult professionals in English communication skills
- Researched, organized, and compiled various resources and activities for use in English program
- Implemented self-created lesson plans in an effective and engaging manner
- Created content and conducted English classes for adults and children
- Developed positive professional and collaborative relationships with an all-Taiwanese staff
- Communicated effectively at a basic level with non-English speaking staff/students
- Created lesson plans, spreadsheets, and presentations using Microsoft Office programs
- Edited and revised testing drafts and written works

4th Grade Inclusion Teacher/ Team Leader/Yearbook Chair
Charles County Public Schools, Dr. Samuel A. Mudd Elementary
Waldorf, MD, August 2005-June 2007

- Created lesson plans and activities that motivated students and engaged them in the learning process by infusing humor and other methods of intrigue
- Kept detailed records of classroom proceedings, student actions and correspondence with parents
- Compiled data on student success and program effectiveness
- Incorporated technology into instruction
- Assessed, analyzed and reported educational data for multidisciplinary meetings
- Generated and implemented objectives, goals, indicators and procedures for Individualized Education Plans to promote student success
- As Team Leader, kept grade-level team under budget and addressed needs of staff, and planned curriculum related activities
- Managed, designed, and organized school yearbook
- PBIS (Positive Behavioral Interventions and Supports) committee member

Substitute Teacher/Preschool
Abide In the Vine Childcare Center

Owego, NY, June 2003-July 2005 (Intermittently)

- Created and planned daily instructional lessons for children ages 1-12
- Developed activities for outdoor and indoor learning experience and recreation
- Engaged various teaching strategies for working with students of different abilities
- Used principles of behavior management to work with students with emotional disorders
- Assisted supervisor with secretarial tasks

Pharmacy Associate
Eckerd Pharmacy

Owego, NY, May 2000-August 2003

- Recorded and filed confidential information using online information systems
- Problem-solved complaints in a way that suited the best interest of customers and the company
- Completed prescription and drug inventories, automation services, and other clerical duties
- Carried out customer service duties

VOLUNTEER EXPERIENCE:

American Chamber of Commerce

Taichung, Taiwan September 2007-November 2010

- Assisted in coordination of fundraising functions (book sales, golf tournaments, dinner dances) through soliciting sponsors and participants, ticket sales, scheduling, and logistical support.

Taichung International Golf Society

Taichung, Taiwan, April 2008-January 2010

- Supported the Society with help setting-up and seeing to the needs of players in their Cross Straits Challenge Tournament. Logistical support was also given for their annual year end banquets.

Accreditation Staff Training & Meeting Agenda, Winter 2019

January 3, 2019

11:00am – 2:00pm

11:45am – Noon: *The Data Integrity Reviewer's Role of Staff*
Presenter: Karly Ziegler

Noon – 12:30pm: Pre-Winter 2019 Meeting

1. Template changes (Katie)
2. Evaluation Visit Invoicing and Payment (PWG)
3. Procedural Changes/Memo to the Field/*Accreditation Criteria*
4. Visit Management I: Visit Preparation
 - a. Full Team Composition Requirements – Academic/Administrative/Public
 - b. Evaluators
 - i. **Training Requirement**
 - ii. Conflicts of Interest
 - iii. 2019 Attestations
 - c. Consideration of the Record of Complaints & Review of External Information
 - d. Pre-Visit Communications
 - i. Notice to State Agencies
 - ii. Sufficient opportunity to identify conflicts of interest
5. Visit Management II: Onsite Evaluation
 - a. Pre-visit team meeting – Required Review & Briefing
 - b. Student Achievement Review

Open Discussion

Thank you for your continued diligence and commitment!

Staff Sign-in Sheet

Name	Role	Signature
McDuffie, Andre	HR Generalist; Accreditation Coordinator	(b)(6)
Morrison, Katie	Accreditation Content Editor	
Walters-Gilliam, Perliter	Vice President of Accreditation	
Zeigler, Karly	Manager, Institutional Compliance	

The Required Pre-Visit Meeting Agenda

- Introduction
- Expectations of Onsite Review based on Information received
- **Discussion of Institutional History and Risk Assessment**
- Council Policies and Procedural Changes
- Review of Various Sources of Information
 - Call for Comment Results
 - Comments from the public (if applicable)



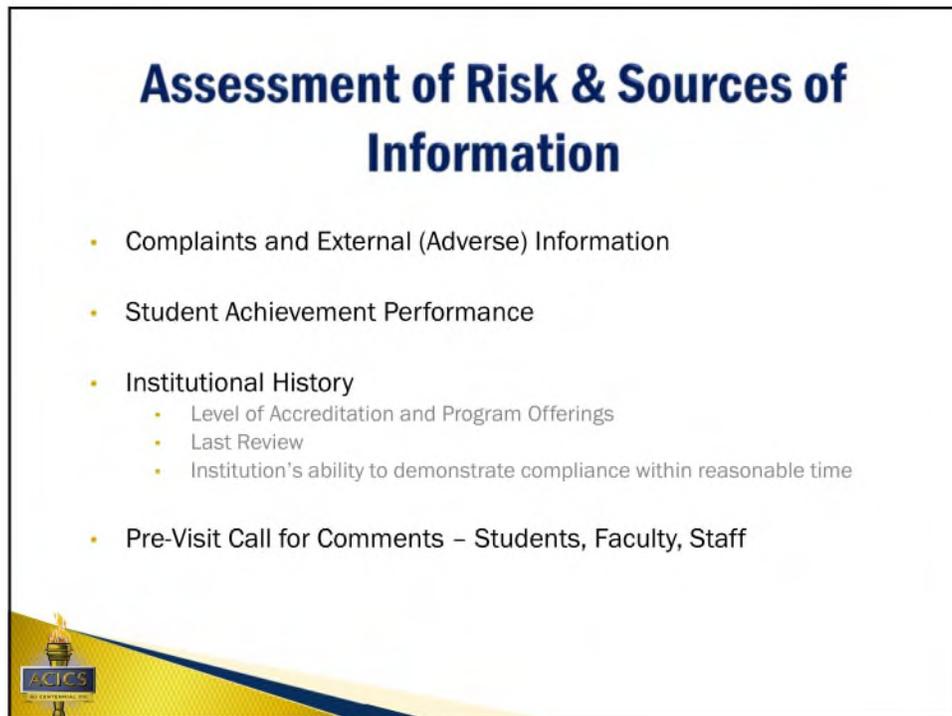
1

Council Policies and Procedural Changes

- Reviewed by ACICS Staff
- Include details on implications of changes to the onsite process
- May require action by evaluators
- Constitutes training prior to serving



2



Perlter Walters-Gilliam

Subject: Post-Council & Pre-Visit Meeting

Location: Conference Room

Start: Mon 8/19/2019 10:30 AM

End: Mon 8/19/2019 12:00 PM

Recurrence: (none)

Meeting Status: Meeting organizer

Organizer: Perlter Walters-Gilliam

Required Attendees: Perlter Walters-Gilliam; Allstaff; Michelle Bonocore

Optional Attendees: Kay Ropko; Michelle Edwards; Shaniqua Smith; Diane Durham; Andre McDuffie; Terri Jelinek

Hi Everyone

So that we can get feedback on the Council meeting, ensure that all post-Council tasks are on schedule, and to prep for the Fall 2019 review cycle, we will meet for about an hour and a half. MB and TJ, the call-in information is the same. Andre, this meeting replaces our meeting 😊

General Agenda Items:

1. Post Council Review and Feedback
 - a. Committee meetings and Council engagement
 - b. Motion Letter Preparation – through September 8, 2019
2. Policy and Procedural Changes
 - a. Final Criteria Changes
 - b. Memo to the Field – mid September
 - c. Revised Criteria – mid September
3. Visit Management I: Visit Preparation
4. Visit Management II: Onsite Evaluation

Have a good weekend!

(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 | 202.336-6769 - P |

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.

Staff Sign-In Sheet

Fall 2019 Post-Council and Pre-Travel Meeting
 Monday, August 19, 10:30am - Noon

Name	Role	Signature	
Michelle Bonocore	Compliance Analyst	(b)(6)	
Diane Durham	Accounting Manager		
Michelle Edwards	President & CEO		
Steven Gelfound	Vice President of Operations		
Terri Jelinek	Sr. Program Analyst		
Cathy Kouko	Sr. Coordinator, Institutional Compliance		
Andre McDuffie	Accreditation Coordinator		
David Moser	Accreditation Content Editor		
Kay Ropko	Sr. Systems Manager		
Shaniqua Smith	Program Analyst		(b)(6)
Perliter Walters-Gilliam	Vice President of Accreditation		
Karly Zeigler	Manager of Policy and Institutional Compliance		

Fall 2019 Post-Travel Meeting Agenda

Monday, November 4, 2019

10:30AM – 12 NOON

- | | |
|--|-------------|
| 1. Travel Cycle in Review | Open |
| 2. Team Report Editing Update/TRIC | Karly/David |
| 3. Evaluators (performance, evaluations, training) | Perliter |
| 4. Personify Project Wrap-Up | Perliter |
| 5. IRC Preparation | Karly |
| 6. December 2019 Council Preparation | Karly |

Open Discussion

Thank you for your continued hard work!

Staff Sign-in Sheet

Name	Role	Signature
Durham, Diane	Accounting Manager	(b)(6)
Edwards, Michelle	President & CEO	(b)(6)
Kouko, Cathy	Sr. Coord. Institutional Compliance	(b)(6)
Moser, David	Accreditation Content Editor	(b)(6)
McDuffie, Andre	Accreditation Coordinator	(b)(6)
Ropko, Kay	Senior Systems Manager	(b)(6)
Walters-Gilliam, Perliter	Vice President, Accreditation	(b)(6)
Zeigler, Karly	Manager, Policy & Institutional Compliance	(b)(6)



THE ACICS PLACEMENT VERIFICATION PROGRAM

Annual Report to the U.S. Department of Education



DECEMBER 21, 2019

Table of Contents

Context.....	2
Background	2
Changes to the PVP System or Review Protocol.....	3
Ongoing Assessment of Strengths and Weaknesses	4
STRENGTHS:	4
CHALLENGES:	5
Evaluation of Invalid Placement Data	6
Programs with Special Circumstances	6
Plan for Hard-to-Verify Placements	6
Data Integrity Assessment and Action	7
Conclusion.....	8

Context

As directed by the Secretary in the November 21, 2018 Decision, this PVP Report addresses: (1) the system's overall function and effectiveness; (2) changes made to the PVP system and protocol since November 2018; (3) our assessment of the current strengths or weaknesses of the system; (4) steps being taken to address identified weaknesses; (5) data on the percentage of placements each year which are found to be invalid during third party review and are not resolved by the institution through the submission of additional information; (6) a description of programs where the agency has had any difficulty obtaining email verification of employment from either the graduate or the employer and a description of how the agency makes efforts to reach those individuals through alternative means, and (7) a table indicating which institutions were cited for high error rates or lack of data integrity, the action the agency took in those instances, and the results of that action.

Background

The ACICS Placement Verification Program (PVP) is a custom-built application which facilitates the submission and review of graduate placement information submitted by ACICS member schools. Hosted in Amazon's cloud, the application is web-based and provides a user-friendly process for the submission of placement information for verification by the graduate and/or the employer directly prior to the validation by the ACICS review team.

The value of the system hinges on the direct contact made through the system with the graduate and/or employer to validate the accuracy of the placement information provided by campuses and reported to ACICS. To prevent abuse, the respondent's IP address is captured at that time and compared against that of the submitter to prevent abuse. This information is extremely important as it gives the location of the submitter and responders. As an IP address is a 32-bit number that uniquely identifies a host on the internet (in this case). For example, we expect that the submitter's IP address is located within the campus. The responder's IP address should not be an exact match or within the same network (the first six numbers of the IP address) unless the graduate is placed at the campus. The PVP system also keeps these IP addresses in its database and a report is generated if the responder's IP already exists in the database. When this does happen, staff verifies that the duplicate IP is for the same employer. The objective of the system is to strengthen the integrity, reliability, and accuracy of the placement information reported and published by ACICS-accredited institutions to all stakeholders.

Changes to the PVP System or Review Protocol

Since its launch and full implementation in 2016, and the submission of the *ACICS Placement Verification Program* document to the U.S. Department of Education in May 2018, the following changes have been made to the PVP system and review protocol:

1. Independent review of contested placement data – to ensure objectivity at every level of review, the ACICS staff member responsible for the review of the original submission is not tasked with reviewing the request for reconsideration of that placement action. This second level review is conducted either by a manager or a third-party, thereby providing additional confidence in the review process and the independence of the validations.
2. Addition of a new language – Mandarin Chinese was added to the list of language choices for selection by graduates and employers.
3. Upgrades to the Administrative Dashboard – to improve the analysts' review by focusing the fields on those areas that are needed to make a determination of appropriateness (and not all the fields that are captured in reporting). Analysts are able to efficiently filter and modify the data fields so that they can target specific schools or placement classification type.
4. Tracking of the total number of non-responders during the reporting period – this capability provides data to determine how significantly non-responders affect the campuses' overall placement rate. Consequently, it allowed ACICS to implement its acceptance of third-party verifications (see item 5 below).
5. Submission of Third-Party Verifications – recognizing that non-respondents may be beyond the control of the campus, ACICS enhanced the PVP system to allow for the acceptance of third-party verifications from Work Number/Equifax of placement, by title, for 10 percent of total submissions. To maintain the integrity of the system, the submission can only be for placement data already in the PVP but for which there were no responses from the graduate or the employer.
6. Exportable Reports - to ensure that campuses can easily reconcile the PVP verification data with their Campus Accountability Report (CAR) for submission, ACICS made the PVP reports exportable in Excel format. Campuses can efficiently manipulate the spreadsheet to feed into the CAR program template (required for submission to the ACICS CAR system). By marrying the two reports, this reduces the error-checking time on the ACICS administrative side and provides the campuses

with an efficient way of making sure the data match. This enhancement has resulted in a marked reduction in error reporting, discussed later.

Ongoing Assessment of Strengths and Weaknesses

STRENGTHS:

1. At least 90% of the verified placement data is dependent on the graduate and/or the employer. This information comes directly to ACICS, not through a 3rd party. As a result, ACICS is able to obtain additional information from these two stakeholders including the use of skills, the placement services provided, and any conflicts in the verification (disagreement between the two). As noted above, following its research over the last year, ACICS is allowing for no more than 10% of the annual submission to be verified by Equifax's Work Number. Because a title match can be verified through employment means and taxes, the acceptance of this method of verification does not compromise the strength of the PVP review process.
2. ACICS is able to identify and take appropriate action on any data point that calls into question the integrity of the placements being report. These include the submission of placements for unacceptable positions, responses from graduates and employers about the accuracy of the placement information, and inconsistencies/inaccuracies in the data.
3. Through the system, staff is able to monitor the verifications by one particular employer or individual, especially if there are multiple verifications from that one source. Further, especially if the graduates deny the validity of the placement, questions would be raised on the objectivity of the employer and suggest possible collusion with the campus. This information is also critical during the Fraud Check review, which is a separate report that is regularly monitored.
4. With regular monitoring of its Fraud Check Report, ACICS is able to detect and take action on any systemic abuse of the system through possible fraudulent responses (by the campus). As will be detailed further in this annual report, there have been instances of such abuses and ACICS very promptly held the institutions accountable. Aware of this PVP capability and the punitive actions taken by ACICS, coupled with the training provided by ACICS, campuses have been more diligent in submitting placement data that are representative of efforts to secure employment for graduates.
5. ACICS has validated 31,132 or 88.6% of placement data submitted to the PVP since its inception. The 11.4% difference represents those data points which were invalid,

non-responders, or unable to verify. In order for ACICS to validate any placement record, it must first be verified by the graduate and/or the employer. Data points that had conflicting verification would not be validated. The previous (historic) onsite sampling process would only identify conflicting information if both the graduate and employer were contacted as part of the sample for verification. Additionally, during the transitional use of independent Data Integrity Reviewers (DIRs) attempting to make 100% contact, identifying conflicting placement information between graduate and employer would also be limited and require that both groups be contacted.

6. Integration of the PVP with the CAR – this assures the accuracy of the placement data reported on the CAR because only those graduates that have been validated in the PVP can be identified as employed. This in turn bolsters the integrity of the placement information published by institutions to students and the public, improving public confidence in the reliability of the data.

CHALLENGES:

1. Institutional integrity – with the possibility of an adverse action against a campus or institution for not meeting student achievement (placement) standards, there is an incentive for campus staff members to manipulate placement data by misrepresenting placement statistics, colluding with “employers”, or creating their own verification mechanism. ACICS has responded very expeditiously to any potential instance of misuse. See below, Data Integrity Assessment and Action. However, with institutional staff members feeling pressured to “produce” on placement, this could be an ethical dilemma for many. ACICS has been vigilant in monitoring its fraud report, reviewing employer frequency (company and contact) and looking at graduate/employer feedback.
2. Changes in campus personnel impacts the ability to commit resources and remain up-to-date on the system changes and enhancements. To ensure that institutions always had access to the information, regardless of the individual tasked with the responsibility, ACICS created a PVP Resources section in its Member Center which includes FAQs, Guidelines, copy of the spreadsheets, and webinar training sessions. Administrators also always have a point of contact for PVP or CAR related issues. However, user error is an ongoing challenge as ACICS continues to provide individual attention to campuses so that the submission to the PVP and ultimately the CAR is accurate. The quarterly submission of data also helps facilitate this ongoing training initiative to help campuses prepare for the November 1 annual submission.

Evaluation of Invalid Placement Data

Since its implementation in 2017, two full CAR reporting periods have been completed – the 2017 – 2018 and the 2018 – 2019. Below is a tabulated break-down of the percentage of placements that were found to be invalid, and the percentage that were not resolved following the consideration of additional information (contested). It should be noted that not all records that were deemed to be invalid were contested by the campus since this is voluntary.

Total Submission	Percentage Invalid	Percentage of Invalid Submissions Contested	Percentage of Invalid Submissions Contested That Remained Invalid
35023	17.4 (6100)	86.5 (5279)	29.6 (1808)

Programs with Special Circumstances

Generally speaking, employers are unresponsive for two reasons:

1. Restrictions as a result of HIPAA or other privacy and data protection laws.
2. Internal procedures concerning their verification of employment for all their employees

These concerns are most evident in the Medical Assisting and Nursing programs, and understandably so given the privacy restrictions. These two programs are also two of the largest offered by ACICS-accredited institutions. See below, Plan for Hard-to-Verify Placements.

Plan for Hard-to-Verify Placements

To mitigate the unresponsiveness, particularly from employers, the Council approved the acceptance of third-party verifications through Equifax's Work Number.

Because non-respondent data negatively affected the placement data reported by campuses, there was a need to consider the reliability of third-party providers as a source of placement verification. The service could only be used for the "title" placement classification as the other classifications require a confirmation of skills being used, or benefit had, by the graduate or employer and no evidence of these qualifiers can be provided by the third-party verification, consistent with ACICS' definitions.

Through research, Equifax's Work Number was found to be (1) the most widely accepted, (2) the most frequently used (and accepted) by those that have used third-party verifications when contesting, and (3) the most reliable.

However, to prevent misuse and to maintain the integrity of the PVP system, a limit was set on the percentage of third-party verifications that would be allowed during a reporting year. From the review of PVP outcomes from the 2018 period, 87% campuses had at least a 90% response rate. Therefore, it was determined that 10% of total PVP submissions, per campus, would be the maximum allowed for third-party verification. This was more than sufficient to allow institutions to capture accurate data from those that do not respond to the PVP email requests.

Implemented for the submission of the 2019 CAR, third party verification requests were submitted for only 31 placement records. Of the 31, 18 were approved and the remainder denied because appropriate documentation (from Work Number) was not submitted. While the response to this opportunity may be attributed to the fact that it is new and campuses not being aware of it, it may also be a result of campuses being more focused on getting responses from graduates instead of the employers with this restriction. Establishing relationships with students from admissions through graduation and placement, with regular follow up and support would also positively affect graduates' responsiveness, reducing the reliance on employers to verify the placement.

Data Integrity Assessment and Action

Following its evaluation of the Fraud Report, ACICS determined that there were a number of campuses whose submissions raised concerns for different reasons, but included the following:

1. The IP address where the placement data was uploaded was the same as that of the graduate and/or employer who verified.
2. The email address for multiple graduates or multiple employers was identical.
3. The email address for the graduate and the employer was the same.
4. The employer is the same for multiple graduates, across various fields, and the website provided for the employer is questionable.

As a result of this review and following a request for information from the campus in question, recommendations were presented to the Council to direct the institution to show-cause why its accreditation, or the approval of the branch campus in question, should not be withdrawn. See the Council Action letters in Exhibit 12.

Institution	Applicable campus	Data Integrity Issue	Council Action	Final Action
Stratford University, Falls Church, Virginia	Stratford University - New Delhi, India	Misrepresentation of placement by the career services director	Direct to Show-Cause	Vacate the show-cause directive but continue the institution on compliance warning for other issues
Gwinnett College, Lilburn, GA	Gwinnett Institute – Orlando, Fl	Misrepresentation of placement by the career services director	Direct to show-cause	Vacate the show-cause directive
American Institute, West Hartford, CT	American Institute, Hartford, CT and Clifton, NJ	Misrepresentation of placement by the career services director	Direct to show-cause	Institution voluntarily withdrew its accreditation prior to being sent the letter

Conclusion and Overall Assessment

The ACICS PVP system is a ground-breaking placement verification process in the career education industry, and the learning curve has been tremendous for both institutions as well as ACICS. Being cognizant of that growth, ACICS has included a system of regular review of the system to identify areas in need of improvements, ways the system can be strengthened, and other ways it can be incorporated into the accreditation process to hold the agency and the institutions accountable. This Report summarizes the agency's ongoing assessment and the outcomes of that assessment by means of changes and adaptations to the system. ACICS is committed to regular ongoing review of the system and making necessary upgrades and changes as deemed necessary for continued confidence in the integrity of graduate placement data reported by accredited institutions.



April 18, 2019

ID CODE 00011909(MC)

VIA EMAIL ONLY

admin@gwinnettcollege.edu

Ms. Lisa McLario
Campus President
Gwinnett College
4230 Highway 29, Suite 11
Lilburn, GA 30047

Subject: Vacate Show-Cause Directive – Data Integrity
Re: Gwinnett Institute, Orlando, FL

ID Code 00269949(BC)

Dear Ms. McLario:

At its April 2019 meeting, the Council considered your institution's response to the three (3) remaining concerns identified in the continued show-cause action taken at its December 2018 meeting, following its review of the institution's verified placement data in the ACICS Placement Verification Program (PVP).

Based on the documentation provided, the Council notes the following:

1. The institution performed an internal audit, as directed by the Council; identified 40 placement records that may have been misrepresented; and took corrective action, as well as steps to prevent future misrepresentation.
2. The institution submitted its new policy on Placement Data Integrity, and evidence of training of the campus's employees on the policy.
3. The institution provided clear evidence of appropriate notification to students of its show-cause status through email and postings around the campus facility.

Council Action

Therefore, the Council acted to vacate the show-cause directive for data integrity.

The institution is reminded that its current grant of accreditation expires December 31, 2019; consequently, it will receive a full renewal of accreditation evaluation visit in the Fall 2019 evaluation cycle in order to continue to assess the institution's compliance with the ACICS *Accreditation Criteria*.

Ms. Lisa McLario

April 18, 2019

Page 2 of 2

If you have any questions about this action, please contact Ms. Michelle Bonocore at mbonocore@acics.org.

Sincerely,

(b)(6)

Michelle Edwards

President and CEO

- c: Mr. William Atkinson, Orlando branch campus (medtechorlando@gwinnettcollege.edu)
Ms. Cathy Sheffield, Accreditation and State Liaison, U.S. Department of Education
Mr. Samuel Ferguson, Commission for Independent Education, Florida Department of Education (joey.smith@fldoe.org)
Mr. Kirk Shook, Georgia Nonpublic Postsecondary Education Commission (kshook@gnpec.ga.gov)
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)



January 11, 2019

ID Code 00011909(MC)

VIA EMAIL AND REGULAR MAIL

admin@gwinnettcollege.edu

Ms. Lisa McLario
Campus President
Gwinnett College
4230 Lawrenceville Highway, Suite 11
Lilburn, GA 30047

Subject: Continued Show-Cause Directive for Placement Data Integrity

GWINNETT INSTITUTE, ORLANDO, FL

ID CODE 00269949(BC)

Dear Ms. McLario:

At its December 2018 meeting, the Council considered the institution's response to the show-cause directive issued in August 2018 regarding the Orlando campus's misrepresentation of placement verification data on the ACICS Placement Verification Program (PVP).

As communicated in the Council's July 8, 2018, letter to the institution, a review of the Orlando campus's placement data submission to the ACICS PVP, which included a comparison with the ACICS Fraud Check Report, uncovered issues with seven submitted employment records. These records included "employer" contacts that were using the same IP address to confirm employment as that of the individual that submitted the PVP record on behalf of the school, and a fictitious e-mail address that was the same for three varied employers.

In response, the campus administration conducted an investigation that found that the e-mail address was created non-maliciously by the director of career services to perform the verification on behalf of employers and graduates that were non-responsive and employers that require use of a third-party verification service such as The Work Number; it claimed the seven graduate placements were legitimate and had been verified via a third party prior to PVP submission. The institution shut down the fictitious e-mail account and put the employee on written warning. Additionally, it reported a change in internal procedures regarding submission of placement verification records into the PVP system.

Following its August 2018 meeting, the Council directed the institution to show-cause why the inclusion of the Orlando branch campus should not be withdrawn from within its accreditation, and requested further information regarding the resolution of the concerns. Based on the Council's review of the additionally requested information, the following areas remain a concern:

1. The campus was required to complete an audit of its placement records for July 2017 – June 2018. Upon the completion of the audit, 40 records were found that may have been misrepresented, and the campus took subsequent actions to correct the records in question and prevent future misrepresentation. In 24 instances, the graduates' email addresses were listed twice, once as the graduate's and once as the employer's. The students' emails were supposedly listed twice based on an oversight made by career services personnel, who listed the graduate's email as the employer's if 3rd party verification was utilized. The records were corrected by leaving the employer's email blank, and resubmitted. The "graduate" is listed as the verifier.

In two instances for a total of eight graduates, a group of four graduates were placed on the same day with the same employers – [REDACTED]

[REDACTED] The campus's internal audit team discovered all of the employee start dates were actually different; however, the career services department personnel had erroneously listed the placement dates for all eight of the graduates as the dates when they were uploaded to the PVP. All eight of the placement records were corrected. Finally, the campus's audit noted that eight employer email addresses listed for eight graduates, separate from those identified above, were from personal rather than workplace domains; all eight of the employers were contacted and the contact persons were re-verified to be associated with the employer listed. While appropriate steps were taken to correct previous inaccuracies in PVP submissions, the substantial number of errors raises concerns over current placement data being reported.

2. The campus made updates to its placement policies, effective August 28, 2018, to eliminate future misrepresentations, based upon the previous findings. However, the "Placement Services and Follow-Up Plan" does not address procedures for monitoring career services personnel and placement data submission to ensure data integrity.
3. The campus provided evidence of the posting of the show-cause directive on the campus website and a copy of the notice that was purportedly sent to students. However, no evidence was provided to demonstrate that the notice was sent, such as email lists, copies of emails sent, or follow-up email/communications among staff that the notice had been sent.

Council Action

Therefore, the Council acted to continue the show-cause directive for subsequent review at its **April 2019** meeting. In response to the show-cause directive, the institution must submit the following information, via the online show-cause application, no later than **February 28, 2019**.

1. Evidence that current data is accurate and reliable. Documentation must include an audit of placement records for the Orlando branch campus for the first half of the 2019 CAR reporting period (July 1, 2018 – December 31, 2018), to include the use of any fictitious email addresses or companies that may have been used and any other records that may have been influenced by this misrepresentation, as well as subsequent actions taken by the campus.
2. Evidence that the institution has appropriate policies and procedures in place to ensure data integrity. Documentation must include a formalized policy on data integrity and an

explanation of procedures the institution has implemented to ensure the appropriate monitoring of career services personnel and data relative to placement, along with evidence that it has been communicated to all staff.

3. Evidence of the notification to current and prospective students regarding the show-cause directive. Documentation must include, but is not limited to, a copy of the notification and the means of communication (i.e. copies of emails sent with email list, etc.).

The response materials must be received via the online show-cause application in the institution's account by the date indicated above. Failure to provide all information requested by the Council may result in the withdrawal of the institution's accreditation.

Institutional Teach-Out Plan

Based on the Council's review of the Teach-Out Plan provided by the institution, 241 students are currently enrolled in five of the campus's six active approved programs. The institution asserts that it has the financial capacity to provide the educational services promised to students and provided a list of four comparable, accredited institutions within a 25 mile radius of the Orlando campus. As part of the continued directive, the institution must provide an updated audit of students which shows their progression towards completion.

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

Please contact Ms. Michelle Bonocore at mbonocore@acics.org if you have any questions.

Sincerely,

(b)(6)

Michelle Edwards
President and CEO

- c: Mr. William Atkinson, Orlando branch campus (medtechorlando@gwinnettcollege.edu)
Ms. Cathy Sheffield, Accreditation and State Liaison, U.S. Department of Education
Mr. Samuel Ferguson, Florida Department of Education, Commission for Independent Education (joey.smith@fldoe.org)
Ms. Corinna Robinson, Georgia Nonpublic Postsecondary Education Commission (crobinson@gnpec.org)
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)



August 10, 2018

ID CODE: 00011909(MC)

VIA EMAIL AND CERTIFIED MAIL

admin@gwinnettcollege.edu

Ms. Lisa McLario
Campus President
Gwinnett College
4230 Lawrenceville Highway, Suite 11
Lilburn, GA 30047

Subject: Show-cause Directive for Placement Data Integrity
Re: Gwinnett Institute, Orlando, FL

ACICS ID: 00169949 (BC)

Dear Ms. McLario:

At its July 2018 meeting, the Executive Committee of the Council considered the matter related to the Orlando campus's misrepresentation of placement verification data on the ACICS Placement Verification Program (PVP) System.

As communicated in its July 8, 2018, letter to Mr. [REDACTED] at that campus, the contacts at the places of employment for three graduates used the same IP address as the IP address used by the individual who submitted the records to the system on behalf of the campus. Further, the email address, 3rdpartyverifier@gmail.com, is the same for these three unique employers as well as for four additional graduates.

In its response, the campus confirmed that the email address was created by the director of career services, Mr. [REDACTED] even though the intent was not to commit fraud. The institution claims the seven graduates in question were legitimately placed and verified via a third party prior to being uploaded to the PVP. However, by Mr. [REDACTED], having identified that the PVP does not accept third-party verification documents for those employers who only use such a service, and where the student is unresponsive, the institution concluded that creating an email account to represent these employers and to respond on their behalf was only a serious lack of judgment and not fraudulent. Further, the response suggests that a lack of guidance from ACICS to Mr. [REDACTED] inquiry about this issue somehow justifies his subsequent action to ensure that these placement records do not stay as unverified, so the campus is able to count the placement it has earned. However, the campus did determine that there is a need for a better internal system of checks and balances for placement prior to uploading to the PVP. As a result, an internal two-step placement verification process has been implemented and includes the verification of all placements by the campus's accreditation coordinator prior to any upload. Further, the director of career services is no longer able to upload any information into the campus database or the

PVP. Instead, once verified by the accreditation coordinator, this individual will be responsible for uploading the information. Mr. [REDACTED] was given a Final Written Warning that indicated that he would be terminated if any further incident of this nature occurred. A copy of said warning was provided in the campus's response along with communication with ACICS staff, an employer, and copies of the verification forms for the graduates in question.

However, the Council considers institutional integrity and capability to be manifested by the professional competence, personal responsibility, and ethical practices demonstrated by all individuals comprising the management; and expects that all data reported to ACICS for any purpose be an accurate and verifiable portrayal of institutional performance, subject to review for integrity and accuracy.

Council Action

Therefore, the institution is directed to show-cause why the approval of the Orlando branch campus should not be withdrawn from within its accreditation. The institution 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 (10) business days of receipt of this notice, by August 24, 2018**. Failure to do so will be considered a deviation from the directives of ACICS and result in a withdrawal by suspension action in accordance with **Section 2-3-402** of the *Accreditation Criteria*.

In response to the show-cause directive, the institution must submit the following information via the online show-cause application, no later than **September 10, 2018**:

1. Internal audit of placement records for the 2018 reporting period (July 2017 – June 2018) at the Orlando branch campus to include an assessment of the use of any other fictitious email address or company that may have been used, any other records that may have been influenced by this misrepresentation, and subsequent action by the institution.
2. Evidence of training completed by all relevant staff, including the accreditation coordinator and the director of career services, which must include ethical responsibility and expectations. A copy of the policy for the two-step placement verification process must also be submitted.
3. The link to the Orlando campus webpage where the show-cause directive has been posted as well as copies of the notice to current and prospective students of the show-cause status.

Institutional Teach-Out Plan

Further, to ensure that students will receive an appropriate outcome in the event of campus closure, the campus must provide the Council with an Institutional Teach-out Plan, utilizing the

Ms. Lisa McLario
August 10, 2018
Page 3 of 3

online Request for Institutional Teach-out Plan application in the Member Center. This *Request for Institutional Teach-out Plan* must be completed as part of the institution's response to this show-cause directive.

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. Michelle Bonocore at (202) 421-5183 or mbonocore@acics.org.

Sincerely,

(b)(6)

Michelle Edwards
President and CEO

- c: Mr. William Atkinson, Orlando branch campus (medtechorlando@gwinnettcollege.edu)
Ms. Cathy Sheffield, Accreditation and State Liaison, U.S. Department of Education
Mr. Samuel Ferguson, Commission for Independent Education, Florida Department of Education (Joey.Smith@fldoe.org)
Ms. Corinna Robinson, Georgia Nonpublic Postsecondary Education Commission (crobinson@gnpec.org)



May 3, 2019

ID Code 00019411(MC)

VIA EMAIL AND USPS DELIVERY

acicsfallschurch@stratford.edu

Dr. David Brand
Interim Campus President
Stratford University
7777 Leesburg Pike, Suite 100-S
Falls Church, VA 22043

**Subject: Vacate Show-Cause Directive – Data Integrity
Place on Compliance Warning – Renewal of Accreditation**

STRATFORD UNIVERSITY, FALLS CHURCH, VA	ID CODE 0019411(MC)
STRATFORD UNIVERSITY, WOODBRIDGE, VA	ID CODE 00019413(BC)
STRATFORD UNIVERSITY – NEW DELHI, UTTAR PRADESH, INDIA	ID CODE 00029108(BC)
STRATFORD UNIVERSITY – GLEN ALLEN, GLEN ALLEN, VA	ID CODE 00039666(BC)
STRATFORD UNIVERSITY BALTIMORE CAMPUS, BALTIMORE, MD	ID CODE 00108252(BC)
STRATFORD UNIVERSITY, NEWPORT NEWS, VA	ID CODE 00135520(BC)
STRATFORD UNIVERSITY – VIRGINIA BEACH, VIRGINIA BEACH, VA	ID CODE 00230405(BC)
STRATFORD UNIVERSITY – ALEXANDRIA CAMPUS, ALEXANDRIA, VA	ID CODE 00239628(BC)

Dear Dr. Brand:

At its April 2019 meeting, the Council considered your institution's response to the two (2) remaining concerns identified in the continued show-cause action taken at its December 2018 meeting, regarding the data integrity of the institution's New Delhi branch campus, and following its review of the institution's verified placement data in the ACICS Placement Verification Program (PVP). Based on the documentation provided, the Council notes the following:

1. The institution performed an internal placement audit for the months of July 2018 – December 2018, as directed by the Council and formally revised its 2018 Campus Accountability Reports by removing three students as "placed" and classifying them as "not placed."

2. The institution submitted evidence of the training of the former new career services director and the current interim career services director on data integrity and ACICS placement standards, as well as overall training of their career services department.
3. The responsibility for inputting campus placements in the PVP has been reassigned to the corporate career services director for Stratford University.

The Council also considered your institution's application for renewal of accreditation, the evaluation team's visit reports for the six (6) campuses visited, and the institution's responses to those reports. The institution appeared before the Council with a cumulative total of 107 findings, of which 74 have not been satisfactorily addressed and include additional areas to ensure consistency across all campuses of the institution. As a result of its review, the Council found the following based on the *Accreditation Criteria*:

Falls Church main campus:

1. There is lack of clarity on the distance education activity administration and delivery at the campus, to include the facilitation of online courses for students at its branch campuses (Section 2-2-106 & Appendix H).
2. The CEP does not evaluate all required elements at the campus and program levels, including direct assessments of student learning outcomes which have not been appropriately selected (Section 3-1-111 and Appendix K). In its response the campus provided the following:
 - a. Student Satisfaction: A blank student satisfaction survey with six (6) questions, and survey results with answers to 16 questions and an open-ended comment section. Also, no summary, analysis, or benchmark data was provided.
 - b. Employer Satisfaction: Completed employer satisfaction surveys – 16 from 2017, and 5 from 2018. However, the surveys did not identify the related student's program or graduation date, and the campus did not provide a summary, analysis or benchmark data.
 - c. Graduation Rates: The campus acknowledged they need a new system and provided graduation rates for each program from 2017-2018 but did not summarize or analyze this data.
 - d. Student Learning Outcomes: The campus provided an updated CEP identifying specific student and program learning outcomes and the assignments for direct assessment to be used to measure each of these. However, the data was only provided for calendar years 2015, 2016, and 2017. There was no data or explanation of how student learning outcomes were utilized and assessed in 2018.
3. Emphasis is not placed on the effectiveness of the overall administration of the campus (Section 3-1-202(a)). The campus responded by providing a resume, job description, and offer of employment to a new campus president, [REDACTED]. However, there was

no evidence to support ██████████ had accepted the position. The campus outlined many activities planned to bring itself into compliance with the issues described in the team's report, yet none of these activities were documented. Supporting evidence was a 343 page document, of which 271 pages were of the Administrative Policies Manual, dated March 8, 2019. However, a review of the policy manual found the most recent date of revision for any activity to be February 23, 2018.

4. The campus does not maintain appropriate documentation that faculty and staff members clearly understand their duties and responsibilities. The campus does not maintain records to support all of its administrative functions (Sections 3-1-202(b) and 3-1-303(a)). While the campus submitted the three faculty members that were identified in the team's report with signed and dated job descriptions, they did not address the other faculty and staff members.
5. The 2018 CAR cannot be verified (Section 3-1-203 and Appendix L). The team found the CAR's 2017 ending student population (793) did not match the CAR's 2018 beginning population (784), as well as the beginning student population reported on the 2018 quarterly reports. The campus responded by stating that the variations between the 2018 quarterly CARs was a result of a need for further CAR training on the new quarterly reporting structure, and that a corporate registrar has been hired who will "oversee the CAR process to ensure proper training and oversight is provided." However, the campus did not acknowledge the discrepancy in number of students from the end of the 2017 CAR to the beginning of the 2018 CAR. If one of these population numbers is accurate, nine students remain unaccounted for. Lastly, as discussed in #8, Stratford University reports undeclared bachelor's degree students in the non-program enrollment of the CAR; this means that students are not accounted for in the campus's retention rate until they have declared their program of study, which is not appropriate.

The campus also provided documentation or information to support retention and placement waivers that the team had been unable to verify onsite, with the exception of one placement waiver for ██████████, graduate of the bachelor's degree program in business administration. The campus had revised its 2018 CAR to address graduates who the team found reported with inaccurate scheduled graduation dates and revised schedule to graduate dates, including ██████████. However, the team had also noted that ██████████'s visa had expired coincident with the start of the CAR period, and she was classified on the 2018 CAR as unavailable for placement due to visa restrictions. The only reference to ██████████'s visa in the campus's response is that her "Initial I-20 was created on 4/25/18" – which was after her program graduation date.

6. Some student records do not reflect the requirements for admission of all students, including graduation from high school or its equivalent (Sections 3-1-303(d), 3-1-411(b), and 3-6-601). In its response, the campus provided copies of the two noted students' – ██████████ and ██████████ – international degrees, evaluated for equivalency by Global Evaluators, which is affiliated with AACRAO through its paid membership. The

Council notes that the *Accreditation Criteria's* current reference to members of AICE, NACES and AACRAO means that a foreign transcript may be evaluated by an endorsed member of AICE or NACES, or by AACRAO's own International Education Services; paid membership in AACRAO, which is available to all schools, students, registrars, etc., does not constitute qualification to evaluate foreign transcripts.

7. Not all student records are safely protected (Section 3-1-303(f)). The campus provided photos to evidence that it has moved the assortment of files, which were unprotected in a space no longer actively utilized by the campus, but which was used for staging in conjunction with a visit from another accreditor and responding to its Title IV audit, and stated that the files are now safely protected. However, the Council must ensure that student records are protected on an ongoing and consistent basis, regardless of circumstantial visits or audits conducted at the campus, and that the registrar is properly trained and aware of his or her responsibility to ensure that such records are properly secured and maintained.
8. Enrollment agreements are not appropriate (Section 3-1-414). The campus responded to the original finding by providing an updated draft enrollment agreement which lists program fees, and provided two implemented agreements for two newly enrolled students, one of whom is undeclared. However, the Council notes that the enrollment agreement still includes references to doctorate programs, when such programs are no longer admitting new students. In addition, the campus has not provided any indication as to whether students sign a new enrollment agreement when they declare their bachelor's degree major. Regardless, the "Undeclared" designation of a student, on an enrollment agreement or otherwise, is not appropriate, especially as it relates to the inaccuracy of retention reporting on the campus's CAR (see #5). Further, if the institution allows for its students to take online courses (up to a certain percentage of their program) administered by other campuses, the enrollment agreement must disclose this possibility in its agreement to ensure understanding.
9. The campus does not have a comprehensive SAP policy for undergraduate and graduate students (Section 3-1-421 and Appendix D). The campus response included a single, revised SAP policy that meets Council standards. The catalog addendum has been updated to include the revised policy. However, in the response the campus stated the following:
Additionally, to ensure the students and staff and faculty are aware of, and understand, the revised policy the following actions have taken place:
 - a. *Campus leadership plans to educate campus level faculty and staff during upcoming staff meetings*
 - b. *Campus leadership will audit the notification workflow and ensure that all policy guidelines are followed and are tracked accordingly.*
 - c. *Campus leadership will host town hall meetings, and open office hours to discuss the changes to the SAP policy with students.*

10. The catalog does not identify application deadlines and amounts that may be awarded for scholarships (Sections 3-1-431(b), 3-1-701, and Appendix C). The campus responded by providing a campus addendum to update these issues in the scholarship section of the catalog. For “Short-Term Scholarships,” more information is stated including deadlines, criteria, procedures, and amount, but which can be found on the website. However, this information is required by the *Accreditation Criteria* to be published in the institution’s catalog in totality. Also, for the “International Student Scholarships,” no information on the amounts, deadlines or procedures is provided.
11. The campus is not conducting follow-up studies on graduate and employer satisfaction at specific measuring points following placement of the graduate (Section 3-1-441(c)). The campus responded by providing employer satisfaction surveys from 16 employers in 2017 and 5 employers in 2018. However, the individual surveys did not identify the student’s program or graduation date, there was no analysis or summary of the data, and no benchmark data was provided. A table of university-wide response rates for January, February, and March 2018 was provided. These were not based on programs of study, but rather for the university as a whole. No additional data of the rest of 2018 or 2019 surveys were provided.
12. The individuals assigned to administer all of the campus’s educational programs and the business administration programs, respectively, do not have adequate time and support to do so. The administration of the accounting programs is not assigned to a qualified individual and there is no evidence that the time and resources devoted to its administration is sufficient. The individual assigned to administer the CSIT programs is not qualified to oversee all programs, especially at the master’s degree level. The administration of the master’s degree program in software engineering is not assigned to a qualified individual (Sections 3-1-511 and 3-6-302). The campus responded stating that it has terminated the dean responsible for all the general education faculty; hired a business administration program director (██████████); and temporarily assigned current faculty to the positions of interim program directors for the accounting (██████████) and computer science/information technology programs (██████████) while it searches for permanent program directors. No documentation was provided to support these individuals have accepted their positions as stated in the response, and no documentation or explanation was provided for the oversight of the general education faculty. The master’s degree program in software engineering is still not administered by a qualified individual, as the team report indicated that ██████████ does not have experience or education in the field of the software engineering field.
13. The accounting and business administration programs do not use a variety of community resources to enrich the programs (Section 3-1-512(c) and Glossary). The campus responded by providing documentation to support they have held a graduate steering committee and held a meeting to discuss the business curriculum. However, no evidence to support these activities have been conducted was submitted.

14. Personnel is not sufficient to support the business administration program (Section 3-1-531(a)). The campus responded by stating they have offered employment as of March 18, 2019 to a new Accounting Program Director to [REDACTED]. [REDACTED] will continue in her role until March 18, 2019. Documentation of [REDACTED]'s resume was provided and a blank accounting program position job description was provided as well as the resume of [REDACTED], the newly appointed director of academic support for the campus, and an unsigned job description for this position.
15. Official transcripts are not on file for all qualifying faculty credentials (Section 3-1-542). The campus responded by providing copies of transcripts for all faculty; however, for one faculty member, [REDACTED], the transcript for her MBA was not valid as it did not identify the campus who conferred the degree and no grading scale included.
16. There is not documented and consistent evidence of the establishment and implementation of faculty development plans (Section 3-1-543). The team responded by providing updated faculty development plans and documentation to support many of the individuals identified in the team's report. However, no documentation to support appropriate in-service plans and/or completion of these planned activities were on file for: [REDACTED].
17. The catalog does not meet Council requirements and is not updated at an appropriate interval (Section 3-1-701 and Appendix C). The campus responded by providing an addendum with appropriate revisions for catalog issues but did not remove all references to the Stratford University Language Institute. On page 18 of the addendum in the ESL Program Scholarship the Stratford University Language Institute is still referenced. The institution also stated that it will update the catalog with the addendum changes by the end of April 2019, but at the time of this letter, the changes still have not been made.
18. All advertising is not compliant with Council requirements. The campus did not provide evidence of consent for testimonials used in its advertising (Section 3-1-703 and Appendix C). The campus responded by providing examples of signed testimonials; however, they did not provide an example of the one student identified in the team's report and did not address this student - [REDACTED].
19. There is no evidence that the librarian participates in annual professional growth activities (Sections 3-4-401, 3-5-401 and 3-6-701). The campus provided a flyer of an upcoming library training; however, there were many dates on this flyer and no indication of which one(s) the librarian planned to attend.
20. The bachelor's degree programs in Health Information Management and Healthcare Administration do not include the minimum number of hours in general education. The SCII15 Introduction to Computer course does not meet the definition of a general education course (Section 3-5-202 and Glossary). The campus submitted a copy of the letter of notification to ACICS of a course substitution. However, the ACA submitted by

the campus designated many courses incorrectly as general education courses: BUS 210, Human Resources Management, BUS 380 Project Management, CIS130 Introduction to Databases and others. Also, the change in course requirements for the program, as well as the removal of the SCI115 course from its Arts and Sciences (general education) course pool (to ensure that students in other programs do not select this course to meet their general education course requirements), have not been updated in the catalog – the changes are still contained within a catalog addendum.

21. There are not qualified and designated committees responsible for the development, modification and maintenance of the graduate programs in CSIT, business administration, and accounting (Section 3-6-301). The campus responded to this concern by creating an oversight committee comprised of the required members for each program and meeting minutes. However, the meeting minutes did not indicate the accounting program was discussed.
22. There is not sufficient evidence that business administration graduate degree program faculty are directly involved in the development and modification of the master's degree program policies, procedures and curricula (Section 3-6-402). Documentation indicated a statement that all faculty are trained on student learning outcomes and rubric training; however, no sign in sheets, or meeting minutes were provided to support this.

Baltimore branch campus:

1. The campus has not notified the Council of all non-substantive changes to its programs (Section 2-2-151(a)). In response to the finding the campus submitted copies of the Academic Credit Analysis (ACA) from 2013 and 2018. The contact hours on the ACA do not match what is currently listed as the approved hours by ACICS for all programs. Additionally, the campus's response noted that for the academic associate's in advanced culinary arts and the academic associate's in baking and pastry arts, two courses, CIS110 and CUL270 were replaced with SCI115 and SCI212, respectively.

The campus indicated that the academic associate's degree in baking and pastry was never 1155 contact hours; however, ACICS located a Non-Substantive Change application from 2012 (App: ID 19603), which identifies the hours as 1155 on both the program application and the submitted ACA for the application.

2. There is lack of clarity on the distance education activity administration and delivery at the campus, to include the facilitation of online courses for students enrolled at other campuses within the institution (Section 2-2-106 & Appendix H).
3. There is no evidence of a plan for distance education instruction and its integration in the CEP (Section 3-1-111 and Appendices H, Section II(b) and K). The campus response included a plan for distance education, but the plan did not contain all the required elements. The plan did appear in the CEP, but was not listed in the Table of Contents, did

not include any actual data or surveys, and lacked evidence of the plan being implemented. The Campus Effectiveness Plan does not include data with distance education activities nor is the data summarized and analyzed.

4. The CEP does not contain all the required elements (Section 3-1-111 and Appendix K). The campus submitted an updated CEP that still contains the campus outcomes but does not include the individual program outcomes. The campus states the previous surveys did not capture program-specific data therefore they will only be able to provide program-specific outcomes after Term 2. However, the Employer Satisfaction surveys do capture the graduate's name and the data could have been assessed by program accordingly. In addition, the SLOs were updated in the CEP but they do not contain program-specific data. Further, adequate analyses, goals, and activities to achieve the stated goals are not consistently provided at either campus or program level for each of the seven required elements in the 2018-2019 and the 2017-2018 CEPs.
5. Direct assessments have not been appropriately selected to reflect the nature of the programs and evaluate student learning outcomes (Section 3-1-111 and Appendix K). The one direct assessment the campus added was a measurement of how many students met the benchmark of 70% in a specific course (typically Capstone) in each program. The campus included data for 2017 but stated this data has not yet been assessed for 2018. It is unclear if the campus had taught these courses in 2018 and therefore could have included program-specific outcome measures. No goals or analysis of these outcomes data for 2017 was included. Further, adequate analyses, goals, and activities to achieve the stated goals were not provided.
6. The campus does not maintain adequate records to support all administrative operations (Section 3-1-303(a)). The Team noted that student [REDACTED] did not have documentation in her file in regards to her taking an STNA. The campus responded "Student did not take an STNA during her enrollment. She was erroneously reported on the 2018 CAR as having taken an STNA. Accordingly, no documents were missing from her file." Therefore the Campus Accountability Report could not be verified.
7. The campus does not consistently follow its admissions requirements for international students (Sections 3-1-303(a) and 3-1-411(b)). The finding was in regards to two international students not having a notarized Affidavit of Support (AOS) on file. The campus responded with a revised international admissions policy that clearly states the AOS is not required to be notarized and evidence of the revised policy in the catalog addendum. However, a review of the campus website shows that the statement "This letter must be notarized" is clearly stated in the international admissions section in regards to the signed affidavit of financial support.
8. Student relations do not reflect high ethical standards in regards to the administration of SAP and admissions requirements for international students (Section 3-1-400). This finding is related to other findings on administration of SAP and Admissions