



ACCREDITING COUNCIL FOR CONTINUING EDUCATION & TRAINING
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August 31, 2016

VIA EMAIL
(director@englishcenter.edu)

Dr. John Tang
Executive Director
The English Center
1005 Atlantic Avenue
Alameda, CA 94501

***Re: Quality Assurance Visit Report Reviewed;
Institutional Show Cause Issued;
Annual Report Accepted;
Follow-Up Visit Required;
Staff Report Required
ACCET ID #73***

Dear Dr. Tang:

At its August 2016 meeting, the Accrediting Commission of the Accrediting Council for Continuing Education & Training (ACCET) reviewed the report of the Quality Assurance Visit (QAV) that was conducted at your institution by ACCET on May 6, 2016, and the institution's response to that report, dated June 13, 2016. Following its review, the Commission voted to issue a show cause directive, requiring the institution to show cause why its accredited status should not be withdrawn due to the cited lack of preparation for the QAV and the institution's failure to respond in a substantive manner to the serious areas of concern indicated in the QAV report. The institution's brief and uninformative responses demonstrated a disregard for the accreditation process and serious areas of non-compliance with ACCET standards, policies, and procedures.

While the institution's response adequately addressed a small number of the findings raised in the QAV report, the remaining findings are in need of clarification and/or resolution relative to ACCET standards, policies, and procedures. Toward that end, the Commission directed that a two-person, one-day follow-up visit be conducted to validate whether the information represented in the institution's response is being systematically and effectively implemented, as follows:

1. The QAV report indicated that the team was unable to verify corrective actions from the last reaccreditation visit relative to documenting part-time employment in accordance with ACCET Document 28 - Completion and Placement Policy. In addition, as noted in the QAV report, due to a recent relocation of the institution and problems with the institution's computers, Document 28.1's - Completion and Placement Statistics could not be provided to the team for review. The report also indicated that, while some documents were available,

including a binder of placement information, it was impossible to correlate them to any specific cohort due to the missing Document 28.1's. Finally, the report stated that the Director of Admissions and Career Services could not provide the team any of the institution's policies on documenting and verifying its job placements.

The institution's response to the QAV report merely noted that the 2015 Document 28.1's were submitted to ACCET as part of the 2015 annual report, and at the Director of Admissions and Career Service will use the best practices from Document 28. No supporting documentation was submitted in the response, such as sample employment verification forms, examples of the implementation of best practices, or copies of the institution's written policies and procedures for documenting placements. Further, as no Document 28.1's were available for the team on site, this process being a central and important part of the QAV and ACCET's review of vocational Title IV institutions, the documentation that was provided to the team could not be correlated to any graduating cohort. Consequently, the institution's statistical data could not be verified.

Therefore, the follow-up team will review the completion and placement data for calendar year 2015 and January-May 2016 in order to validate the institution's reported completion and placement rates. The institution must have completed ACCET Document 28.1's for those time periods for all vocational programs, along with employment data as required by ACCET Document 28 for each listed placement. In addition, the team will review the institution's written policies procedures for documenting all types of placements, including full- and part-time placements, and will review a sample of graduate placement files to ensure that the institution's policies and procedures are being systematically and effectively implemented in practice.

2. The QAV report indicated that the team reviewed ten files for students who had withdrawn, but that only Return to Title IV (R2T4) documentation was available. Refund calculation worksheets were not provided, so the team could not verify whether any non-Title IV refunds were due to students and, if one were due, how it was calculated.

The institution's response included a copy of its catalog with the note that the R2T4 policy has been added to it. No other supporting documentation was provided to demonstrate that the institution is correctly calculating refunds due students or that refunds due are paid in a timely manner.

Therefore, the follow-up team will conduct a review of withdrawn/terminated student files to ensure that the institution is systematically and effectively implementing both the R2T4 process and the refund process in accordance with state and ACCET requirements. The institution must demonstrate to the team that it maintains the required documentation to accurately calculate refunds, including enrollment agreements, student attendance rosters to note the last date of attendance (LDA), withdrawal/termination information in order to note the date of determination (DoD), student ledgers/payment information, a refund calculation worksheet that indicates this information with a clear calculation showing how any refund due was determined, and

finally, proof of refund for all refunds due. Note that a refund calculation worksheet must be completed for all students to determine if a refund is due.

3. The QAV report indicated that the institution's Career Readiness Programs (CRP 16, 24, 32, 40, 48, 56, and 64) clock-hour totals included the work done outside of class. The hours of work done outside of class should only be used to calculate credits for Title IV financial aid purposes and do not count towards the actual class hours for a program.

The institution indicated in its response that it provided an updated program chart; however, no program chart was included. A copy of the catalog was provided, and this evidenced correct clock-hour lengths for the programs cited. However, the catalog also states on page 12 that the CRP programs are clock-hour programs when, in fact, they are credit-hour programs.

Therefore, the follow-up team will review all promotional material to ensure that the institution is promoting only ACCET-approved programs and clock/credit hours.

4. The QAV report indicated multiple items of concern with the institution's catalog, referenced by item number from ACCET Document 29 – Catalog Guidelines and Checklist. Items 3, 9, 10, 11, 12, 14, 17, 18, 23, 24, 27, 28, and 31 were cited as needing updating or revision. In addition, the report stated that the catalog referenced a Healthcare Career Pathway Project, which is described as being part of the Academic and Professional Program, but which did not identify electives such as NCLE-RN preparation. It noted that, while the institution has a Healthcare Career Coach, the institution does not have approval to offer medical courses and it was unknown if the staff employed had the qualifications to be a medical instructor or career counselor.

The institution's response included a copy of its 2016 catalog, which was updated based upon the items noted in the QAV report. However, no completed copy of Document 29 was provided to aid in the review of the catalog. Upon evaluation, the Commission found that several items are still in need of revision and/or clarification, as noted:

- Item 10: The QAV report cited the description of the admissions process as being unclear, noting that prospective enrollees are "encouraged" to visit the center. In its review, the Commission noted that students are "encouraged" to review the catalog before signing the enrollment agreement. However, per ACCET Document 29.1 – Enrollment Agreement Checklist, students must sign that they have read and understood the catalog before signing the enrollment agreement.
- Item 11: The report cited the catalog for not indicating admissions procedures for students with special needs. The catalog provided in the response still did not include admissions procedures for students with special needs.
- Item 17: The QAV report indicated that the catalog did not include the breakdown by course of clock hours and credit hours or the lecture/lab hour breakdowns for each course. The updated catalog still did not include this information.

- Finally, while the institution removed reference to the Healthcare Career Pathway Project, this program is still listed on the institution's website, along with Study Tours, which appear to be avocational courses with both English and content-based curriculum that are not approved by ACCET.

In addition to its review of the catalog, the QAV team reviewed the institution's enrollment agreement using ACCET Document 29.1- Enrollment Agreement Checklist. Items 3 and 12 of the checklist were cited. For item 3, the fees for room, board, and health insurance were referenced but not broken out. For item 12, the refund policy did not address no-shows or students who are rejected for admission by the institution.

The institution's response included an updated copy of its enrollment agreement with no explanation of the changes made. It appears that the fees cited by the team have been removed, although it is unclear whether or not the institution has ceased offering the services described by the previous fees. Further, the cancellation and refund policy in the enrollment agreement provided in the response still does not address no-shows or students rejected by the institution, as required by ACCET Document 31 – Cancellation and Refund Policy.

Therefore, the follow-up team will review the institution's catalog and enrollment agreement to ensure that they are in full compliance with ACCET policy. The institution must complete an ACCET Document 29 and 29.1, with page number references to the catalog and the enrollment agreement, for review by the follow-up team.

In addition, upon receipt of this letter, the institution is directed to seek guidance from ACCET staff on the Healthcare Career Pathway Project and Study Tours, for possible application as new programs/courses. Direct your inquiry to Ms. Carol Crehan, Accreditation Coordinator, at ccrehan@accet.org.

In addition, the Commission directed the institution to submit a staff report to include the following specific items:

- The team report indicated that the commission Representative on the QAV visit was informed that face-to-face enrollment takes place at the institution's auxiliary campus in Pittsburg, California, which is contrary to ACCET requirements for branch and auxiliary locations as stipulated in ACCET Document 26 – Policy on Additional Locations and Changes of Location.

The institution indicated in its response that it would submit an application to "upgrade the Pittsburg auxiliary classroom to a branch campus." However, as of the date of this letter, no application has been received.

Therefore, the institution is directed to submit an application for a new branch campus per the requirements of ACCET Document 26, with all supporting documentation as

stipulated in the ACCET policy. Prior to receiving interim approval of the new branch, the institution must cease enrollment activities at the Pittsburg campus.

A copy of this application, including the attached staff report cover sheet, must be emailed to staffreports@accet.org and to Mr. James Doran, Senior Accreditation Coordinator, at jdoran@accet.org for receipt at the ACCET office no later than **September 30, 2016**.


As a reminder, please be advised that late submission and receipt of documents and reports are subject to significant late fees in accordance with Commission policy. These fees are outlined in ACCET Document 10, which can be found at www.accet.org.

The follow-up visit must take place prior to the December 2016 Commission meeting. Therefore, it is imperative that the institution submit a copy of ACCET Document 8 – Visit Request Form, requesting a two-person, one-day on-site evaluation visit and the on-site visit fee of \$3800.00 (refer to ACCET Document 10 – Fee Schedule) for receipt at the ACCET office no later than **September 9, 2016**, to allow for appropriate scheduling of the on-site visit and subsequent review by the Commission. These documents are available on our website at www.accet.org.

Further, while under a Show Cause directive, the institution is restricted from making any substantive changes including, but not limited to, new programs, major program revisions, new branch campuses or other new sites, or relocations out of the general market area. However, the Commission will allow the institution to apply to upgrade the Pittsburg, CA auxiliary location to a branch campus as required on page 4 of this letter.

Your demonstrated capabilities and commitment in support of the institution's accredited status are essential to a favorable outcome in this process. Should you have any questions or need further assistance regarding this letter, please contact the ACCET office at your earliest opportunity.

Sincerely,



William V. Larkin, Ed.D.
Executive Director

WVL/sef

Enclosures: Staff Report Cover Sheet
ACCET Document 8 – Request for On-Site Visit

The English Center

August 30, 2016

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CC: Mr. Herman Bounds, Chief, Accreditation Division, US ED (aslrecordsmanager@ed.gov)
Ms. Martina Fernandez-Rosario, ACD - San Francisco/Seattle, US ED (martina.fernandez-rosario@ed.gov)
Mr. Ron Bennett, Director, School Eligibility Service Group, US ED (ron.bennett@ed.gov)
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ACCET Staff: Linsay Oakden, James Doran, Carol Crehan