



September 6, 2024

VIA EMAIL
academic@aoicollege.edu

Mr. Noah Johnston
Manager
AOI College of Languages
3 Corporate Park, #140
Irvine, CA 92606

**Re: Reaccreditation Deferred
Institutional Show Cause Continued
Follow-up Visit Report Reviewed
Interim Report Reviewed
Interim Report Required
ACCET ID #1454**

Dear Mr. Johnston:

At its August 2024 meeting, the Accrediting Commission of the Accrediting Council for Continuing Education & Training (ACCET) considered the interim report submitted by AOI College of Languages, located in Irvine, CA, in response to the May 3, 2024 Commission letter, which deferred reaccreditation, resulting from a review of the application for reaccreditation, the team report (visit conducted October 17–18, 2023), the institution's response to that report (received November 28, 2023), the institution's interim response report (dated January 31, 2024), the unannounced visit report (visit conducted February 14, 2024), and the institution's response to that report (dated March 26, 2024). The April 2024 action deferred reaccreditation for one cycle and directed the institution to provide an interim report regarding Standards II.D – Records, III.B – Financial Procedures, VII.A – Recruitment, VIII.B – Attendance, VIII.C – Student Progress, and IX.D – Completion and Job Placement.

In addition, the April 2024 action directed a two-day, two-person follow-up visit to be conducted in the August 2024 review cycle to further evaluate serious concerns relative to a pattern of outdated policies, system errors, duplicate records, clerical errors, and general mistakes related to the administrative capabilities of running an institution, and issued an Institutional Show Cause directive requiring the institution to show cause why its accredited status should not be withdrawn, as a result of continued serious concern relative to the institution's ability to comply with operational and governance standards in accordance with ACCET policies.

At the August 2024 meeting, upon review of the institution's interim report, dated May 31, 2024, the follow-up visit team report (visit conducted June 19-20, 2024), and the institution's response to that report (dated July 19, 2024), the Commission voted to continue the Institutional Show Cause directive, defer consideration of reaccreditation for an additional cycle and to continue the institution's accredited status, pending further review at its December 2024 meeting. The deferral of reaccreditation indicates that the institution has not demonstrated compliance with one or more standards of accreditation and is reported to the US Department of Education as a probationary equivalent status. The Institutional Show Cause directive was continued as the institution has yet to demonstrate compliance with operational and governance standards in accordance with ACCET policies as identified below.

Therefore, the Commission directed the institution to submit an interim report for review at the December 2024 meeting to include the following specific items:

1. Standard II.D – Records

The interim report directed the institution to provide a narrative explanation of the presence of “trial students” in classrooms during the unannounced visit in February 2024, after indicating it had ceased offering free trial classes.

The interim report also directed the institution to update its Leave of Absence policy which did not contain all required elements of ACCET Document 36.IEP - Leave of Absence, Medical Leave, and Vacation Policies, nor did it align with SEVP expectations relative to appropriate documentation required for medical leaves of absence.

Further, the follow-up visit team report indicated that the institution’s internal records auditing process continues to produce inaccurate student data. Of the 85 student records reviewed, 10 student end dates were listed incorrectly in the institution’s database as compared to student records in SEVIS.

In its interim report response, the institution confirmed that trial classes are no longer offered and indicated a difference between “trial classes” and “trial students.” However, no policy regarding “trial students” was provided.

In its response to the team report, the institution indicated that it has consistently applied its revised records auditing policy, and these inaccuracies were a result of clerical errors. However, the issue still remains that the institution is not demonstrating effective record-keeping techniques.

Therefore, the institution is directed to provide a written policy regarding “trial students,” including a clear definition and expectations of trial students, associated student costs, timing, record keeping, and required agreements. Additionally, the institution is directed to provide documentation that this policy has been provided to prospective students, staff, and faculty, as well as evidence of training provided to all admissions staff and faculty regarding the trial student policy. The institution is directed to provide a list of all current trial students, including their corresponding class and length of the trial.

Further, the institution is directed to provide evidence that it can produce student records free of clerical issues and inaccuracies. Documentation must include a list of all student end dates from the period of May 1–September 31, 2024 to include the student’s name, final level, and end date. The institution must also provide the SEVIS records for the same list of students to demonstrate that all end dates align.

2. Standard III.B – Financial Procedures

The interim report directed the institution to provide a narrative explanation for the frequency of clerical errors found in financial files to include an explanation and documentation regarding the issuance of a credit to student T. Kajitani as listed in the

student ledger, as well as examples of credits issued to other students and the calculation of such credits.

In its response, the institution indicated that a process of checks and balances has been adopted to prevent clerical errors in financial files. The institution provided an explanation of the credit provided to student T. Kajitani to cover the cost of tuition after an approved leave of absence, as well as examples of other issued credits and their calculations. However, the institution did not provide a copy of its refund policy and procedures, nor did it demonstrate how the issuance of these credits is in compliance with ACCET standards.

Therefore, the institution is directed to provide a copy of its refund policy and procedures, which are in compliance with ACCET Document 31.IEP—Cancellation and Refund Policy.

3. VIII.C – Student Progress

The follow-up visit team report indicated that the institution's policy on repeating levels permits a student to repeat a successfully completed course once. The team found that this policy is appropriate for test preparation programs, however, relative to the the IEP program, the policy does not align with ACCET Document 18.IEP, which states, "Levels may be repeated, based on a sound written and well-documented rationale established by the institution." Approximately half of the student files reviewed by the team contained learning plans, even after students successfully completed a course which raised concerns regarding the institution's curriculum learning outcomes.

Further, the follow-up visit team report indicated that progress and attendance are not calculated cumulatively as required by ACCET Document 18.IEP - Satisfactory Progress Policy which states, "Satisfactory Progress policies are cumulative, include all periods of attendance at the institution, and are applied consistently to all students attending similar programs."

In its response to the team report, the institution provided an updated repeat policy which now narrows the eligibility of a student to repeat a course they have successfully completed to those who achieved a final grade of 70-75%. The policy requires students to seek approval from the Academic Director to repeat a course and the completion of a Student Learning Plan with sound rationale is to be included in the student's academic file. However, no documentation to demonstrate implementation of the revised policy was provided.

The institution also provided the attendance and academic record of student T. Oebisu, which indicated attendance and grades for Spring A 2024, Spring B 2024, Spring C 2024, and Summer A 2024 sessions. The record also indicated cumulative calculations of attendance and grades per term (Spring A/B/C 2024 cumulative and Summer A/B/C cumulative). However, ACCET Document 18.IEP requires cumulative calculation of all periods of attendance at the institution, not per term or session. In the case of student T. Oebisu, this would include all four sessions of attendance with no separation or distinction between Spring and Summer terms.

Therefore, the institution is directed to provide a narrative update on these issues to include:

- **Evidence of systematic and effective** implementation of its revised repeat policy to **include five examples** of students who repeated a successfully completed level to include the corresponding student transcripts, written approval from the Academic Director, and documented learning plans.
- Updated policies and procedures to align with ACCET Document 18.IEP Satisfactory Progress Policy indicating that satisfactory progress is cumulative and includes all periods of attendance at the institution.
- Evidence of training **of staff and faculty** on the revised policy and evidence that the revised policy has been shared with all students.
- Evidence of all students placed on attendance or academic warnings as a result of implementation of the required student progress policy update.

Further, as a result of the continued Show Cause directive, the institution is required to provide the following:

- An updated teach-out plan in accordance with ACCET Document 32 – Teach-out/Closure Policy, in the event of the institution’s closure, and as required following the issuance of a Show Cause directive as described in ACCET Document 11 – The Policies of the Practices of the Accrediting Commission.
- **Notification to all current and prospective students of the** continued show cause action within seven days of receipt of this letter in accordance with ACCET Document 11 – Policies and Practices of the Accrediting Commission. **Evidence of notification must be submitted to the ACCET Interim Report upload link noted below no later than September 13, 2024.**

The institution’s response, including the attached interim report cover sheet, must be uploaded (link provided below) no later than **October 31, 2024**, for the institution’s report to be considered further at the Commission’s December 2024 meeting. Please see the attached submission instructions.

ACCET Interim Report upload link: <https://www.dropbox.com/request/owwNFFSirPC8ai6OKh25>

As a reminder, a \$500 late fee will be charged to an institution for the late submission of an interim report. Please see (page 6 of) [ACCET Document 10 – Fee Schedule](#) for additional information.

Deferral of reaccreditation is not an adverse action and is explained in ACCET Document 11 – Policies and Practices of the Accrediting Commission, which is available on our website at www.accet.org. The deferral of a final decision is intended to allow for an opportunity to clarify and/or resolve the issues of concern cited herein, specifically focused on the demonstration of systematic and effective implementation of revised policies and procedures in practice over time. In accordance with Commission policy, no substantive changes, including, but not limited to, new programs or major program revisions, new branch campuses or other new sites, and/or relocation out of the general market area, will be permitted during the term of the deferral period

In accordance with Commission policy, no substantive changes, including, but not limited to, new programs or major program revisions, new branch campuses or other new sites, and/or relocation out of the general market area, will be permitted while on a show cause directive.

The appropriate state and federal education officials will be notified of this action by copy of this letter. The institution is advised to visit the ACCET website at www.accet.org for timely updates and for downloading the most current information, policy documents, and forms.

Should you have any questions or need further assistance, please contact the ACCET office at info@acct.org or 202-955-1113.

Sincerely,



Res Helfer
Executive Director

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Attachments: Interim Report Cover Sheet
Interim Report Submission Instructions

cc: Mr. Herman Bounds, Chief, Accreditation Division, US ED (aslrecordsmanager@ed.gov)
Ms. Charity Helton, Specialist, Accreditation Division, US ED (charity.helton@ed.gov)
Mr. James Hicks, Deputy Director of External Services, SEVP (james.d.hicks@ice.dhs.gov)
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