



December 20, 2016

ID Code 00010791(MC)

VIA E-MAIL AND OVERNIGHT DELIVERY

Mr. Dante Ferraro
President
Spanish-American Institute
215 West 43rd Street, 2nd Floor
New York, NY 10036

acics@sai2000.org

Dear Mr. Ferraro:

Subject: Denial of Renewal of Accreditation

The Council considered your institution's application for a renewal of accreditation, the visit report, and the responses. The institution first appeared before Council in April 2016 with 16 findings and was then issued a Compliance Warning action. The institution most recently appeared before Council with 11 findings. As a result of its review, the Council found the following based on the *Accreditation Criteria*:

1. The institution no longer meets ACICS minimum eligibility requirements. Due to lack of enrollment since June 2014 in any of the three career-based programs at the institution, the institution is ineligible for ACICS accreditation. The Council found that the institution does not primarily offer "programs designed to educate students for professional, technical, or occupational careers." With students enrolled only in the ESL programs, the institution does not enroll "a majority of its students in one or more programs, the content of which is on a postsecondary academic level and which leads to a postsecondary academic credential or an occupational objective" (Section 1-2-100(a)(d)).

In response to the finding, the campus submitted an explanation that it had a "sustained and growing student enrollment." However, this documentation did not meet Council standards due to the following: there is no evidence that there is enrollment in one or more career-based programs.

2. There is insufficient evidence of the effectiveness and efficiency of the campus administration (Section 3-1-202(a)).

In response to the finding, the campus submitted an organization chart, job descriptions, data sheets, in-service certificates, action plans, workshop certificates, and detailed action

plans for going forward. Two administrative members had Renewal Accreditation Workshop certificates dated September 2, 2015. However, this documentation did not adequately address Council standards due to the following: there was no evidence of continuous training on the responsibilities of key administrators with appropriate oversight to ensure they are able to manage the campus effectively and maintain compliance with ACICS Accreditation Criteria. The action plans did not include any completion dates for the activities already completed or to be carried out.

3. The institution does not maintain appropriate records in a number of administrative areas. There is insufficient evidence that the institution provides supervision of employees and evaluates their work; that faculty and staff are aware of their job duties and responsibilities; or of the completion of faculty in-service and professional growth activities (Sections 3-1-202(b), 3-1-303(a), and 3-1-543).

In response to the finding, the campus provided standardized job descriptions and professional development and in-service documents. However, this documentation did not meet Council standards due to the following: the job descriptions were not individualized and were not signed and dated by the employee. Professional development and in-service documents were not individualized.

4. There was no evidence that students receive a copy of their enrollment agreement (Section 3-1-414).

In response to the finding, the campus stated that it would be difficult to review the enrollment agreements of all its students. The campus did provide copies of a form called "Acknowledgement & Affirmation" signed by admissions employees stating that they always give students a copy of their enrollment agreement. However, this documentation did not meet Council standards due to the following: the evidence provided does not evidence that each individual student acknowledges receipt of their enrollment agreements.

5. There is no documentation that students are advised of their satisfactory academic progress (SAP) status (Section 3-1-422).

In response to the finding, the campus provided the current list of students not meeting SAP, newly created counseling forms, tutoring forms, and a formalized plan for the counseling process. However, this documentation did not meet Council standards due to the following: there was no evidence that these forms are being implemented systematically and effectively in counseling with students.

6. The academic governance policy does not meet Council standards, and there is no evidence that faculty are aware of this policy (Section 3-1-501).

In response to the finding, the campus provided a revised Academic Governance policy. However, this documentation did not meet Council standards due to the following: there is no evidence that faculty members are aware of the policy.

7. There is no documentation to evidence that the ESL program chair has sufficient authority, time, and resources to develop and administer the program (Section 3-1-511).

In response to the finding, the campus provided credentials and an ACICS data sheet for the ESL chair. The response also included a general job description for all positions at the institution and a course schedule for Dr. Panganiban. However, this documentation did not meet Council standards due to the following: the job description was not an individual description of Dr. Panganiban's duties only. The class schedule did not include all classes offered at the institution.

8. There is no evidence that all interested parties, such as advisory boards, are involved in the formation of policies and the design of educational programs (Section 3-1-512).

In response to the finding, the campus provided letters to community members to request participation by reviewing syllabi and program offerings, a chart delineating board member assignments, a spreadsheet showing responsible parties for CEA (their programmatic accreditor for English Language programs) standards, and meeting minutes regarding CEA standards. However, this documentation did not meet Council standards due to the following: no evidence was presented showing a developed plan in designing educational programs. There was no evidence of active participation in curriculum design of the educational programs.

9. The disclosed performance information is not available where stated in the revised catalog (Section 3-1-701 and Appendix C).

In response to the finding, the campus provided a revised catalog showing retention and placement tables on page 12 and graduation rates on page 13. However, this documentation did not meet Council standards due to the following: data provided in the online version of the catalog does not match the data presented in the hard copy version.

Council Action

Because no evidence has been provided that there is enrollment in any career-related program, the campus is not eligible for accreditation by ACICS. Therefore, the Council acted to deny the

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institution's application for a renewal of accreditation. Further, the institution fails to meet ACICS standards in several other areas as noted above.

Current Grant Expires December 31, 2016

The institution is advised that the current grant of accreditation expires on December 31, 2016. Should the institution elect to appeal the decision and remit the appropriate fee by the established deadline, the grant of accreditation will be extended through April 30, 2017.

Please notify the Council office in writing within ten days of receipt of this notice if you desire to appeal this decision to the Review Board. The appeal notification must include payment as detailed in the Schedule of Fees under Hearing Fees. The Council's decision is final and will be published if the appeal notice and appropriate fee are not provided within ten days of your receipt of this notice. If the institution elects to appeal this action to the Review Board and remits the appropriate fee by the established deadline, then more detailed appeal procedures and information will be forwarded to the institution.

Institutional Teach-Out Plan

Finally, if the institution exercises its appeal rights, in compliance with Section 2-2-303 of the *Accreditation Criteria*, the institution is directed to submit to the Council office by **January 31, 2017**, the ACICS Campus Closing Application, which includes an appropriate teach-out plan and all applicable documentation requested by the application.

The Council expects that the institution will take the appropriate steps to assist its students through any transition to successfully complete their programs in an orderly manner. You are advised that Section 2-3-900 of the *ACICS Accreditation Criteria* stipulates that the Council may bar any person or entity from being an owner or senior manager of an ACICS-accredited institution if that person or entity was an owner or manager of an institution that loses its accreditation as a result of a denial or suspension action or that closes without providing a teach-out or refunds to students matriculated at that time of closure.

If the institution elects not to appeal this action, any comments you may wish to make with regard to this decision must be submitted to the Council office within two weeks of the date of this letter. Should you choose to submit any comments, these comments will be included in the summary detailing the reasons for the Council's decision that will be made available to the U.S. Secretary of Education, the appropriate State licensing or authorizing agency, and the public through www.acics.org.

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Please contact Ms. Perliter Walters-Gilliam at pwgilliam@acics.org or (202) 336-6770 if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Roger J. Williams". The signature is written in a cursive style. Behind the signature, there is a faint, semi-transparent watermark of a building with a dome, likely the U.S. Department of Education seal.

Roger J. Williams
Interim President

- c: Ms. Cathy Sheffield, Accreditation and State Liaison, U.S. Department of Education
(aslrecordsmanager@ed.gov)
Ms. Betty Coughlin, U.S. Department of Education, School Participation Team, Region I
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(mhreeves@cea-accredit.org)