



September 7, 2018

ID Code 00010582(MC)

**VIA EMAIL AND CERTIFIED MAIL**

*regulatory.birmingham@vc.edu*

Ms. Deana Southerland  
Interim Campus President  
Virginia College  
488 Palisades Boulevard  
Birmingham, AL 35209-5154

**Subject: Continue Institutional Show-Cause Directive – Adverse Action by Another Agency**

**RE: Virginia College, Birmingham, Alabama (00010582 MC)**

Dear Ms. Southerland:

As detailed in its May 8, 2018, letter (revised May 15, 2018), the Council issued an institutional show-cause directive to Virginia College due to the adverse action taken by the Accrediting Council for Continuing Education & Training (ACCET) denying Virginia College's application for initial accreditation and the Council's prior campus-level student achievement show-cause directives to 15 of the institution's campuses. The Council has reviewed Virginia College's response to the institutional show-cause directive, including the July 13, 2018, response, the July 9, 2018, Appeal of the ACCET Action to Deny Initial Accreditation, the supplemental documents regarding the ACCET Appeal Hearing, and the testimony provided at the hearing held on August 7, 2018. As a result of its review, the Council notes the following:

1. The ACCET action letter dated May 1, 2018, cited noncompliance with 23 ACCET standards as the basis for the denial of initial accreditation. Each ACCET finding cites specific Virginia College campuses at which ACCET identified potential noncompliance with its standards.
2. In the heading for several of the findings, ACCET lists campuses that are not addressed by ACCET in the corresponding narrative regarding potential noncompliance. It is the Council's understanding that the references to these campuses were the result of a clerical error and that the campuses in question were not found to be out of compliance with the relevant ACCET standards. We therefore do not address those campuses below when discussing the relevant findings.
3. Virginia College asserts it experienced a compressed timetable for the initial ACCET accreditation process and, after hosting ACCET site visits, the institution had two weeks in which to respond to 27 ACCET team reports. The institution reported that these

timing limitations impacted its ability to comply with all ACCET standards and respond to ACCET's findings of noncompliance within the allotted time period.

4. For certain areas of noncompliance cited under the ACCET standards, the alleged deficiency does not result in noncompliance with ACICS standards. By way of example:
  - a. Alleged deficiencies in the institution's ACCET application regarding auxiliary classroom applications and the programs included on the institution's application do not result in noncompliance with the ACICS standards because such classrooms and programs are currently within the scope of the institution's ACICS accreditation. (*Finding 2 of the ACCET Action Letter – GAA Myrtle Beach, GAA Dallas, GAA Phoenix, GAA San Diego, Birmingham, Austin, Baton Rouge, and Shreveport*)
  - b. The institution's Occupational Associate Degree programs cited by ACCET meet the ACICS general education requirement at Section 3-3-202 of the *Accreditation Criteria*. (*Finding 8 of the ACCET Action Letter – GAA Dallas, GAA Orlando, GAA Phoenix, and GAA San Diego*)
  - c. ACICS does not require the institution to follow ACCET attendance policies. (*Finding 18 of the ACCET Action Letter – Aurora Ecotech, GAA Myrtle Beach, GAA Phoenix, Birmingham, Augusta, Charleston, Jacksonville, and Montgomery*)
  - d. ACCET and ACICS utilize different measures of student outcomes and have different reporting and documentation requirements. (*Finding 23 of the ACCET Action Letter – Birmingham, Aurora Ecotech, Augusta, Austin, Baton Rouge, Biloxi, Charleston, Chattanooga, Columbia, Columbus, Florence, Ft. Pierce, GAA Orlando, GAA Phoenix, GAA San Diego, Greensboro, Greenville, Huntsville, Jackson, Jacksonville, Knoxville, Lubbock, Macon, Mobile, Montgomery, Pensacola, Savannah, Shreveport, Spartanburg, and Tulsa*).
  
5. The Council has reviewed the responses and documentation provided in response to the following findings and has found those responses acceptable, and not indicative of non-compliance with the ACICS *Accreditation Criteria*:
  - a. Governance (*Finding 2 of the ACCET Action Letter – institution-wide, Greenville, Spartanburg, and Montgomery*)
  - b. Institutional management (*Finding 3 of the ACCET Action Letter – Aurora and GAA Dallas*)
  - c. Financial procedures (*Finding 6 of the ACCET Action Letter – Chattanooga, Greenville, Spartanburg, and GAA Dallas*)
  - d. Financial assistance/scholarships (*Finding 7 of the ACCET Action Letter – Greensboro, GAA Orlando, and GAA San Diego*)
  - e. Educational goals and objectives (*Finding 8 of the ACCET Action Letter – Birmingham, Lubbock, Macon, Mobile, Pensacola, and Tulsa*)
  - f. Program/instructional materials (*Finding 9 of the ACCET Action Letter – Columbia and Jacksonville*)

- g. Externship/internships (*Finding 10 of the ACCET Action Letter – Ft. Pierce, Jackson, Montgomery*)
  - h. Curriculum Review/Revision (*Finding 11 of the ACCET Action Letter – GAA San Diego*)
  - i. Learning resources, equipment and supplies (*Finding 13 of the ACCET Action Letter – Austin, Birmingham, and Montgomery*)
  - j. Supervision of instruction (*Finding 14 of the ACCET Action Letter – Biloxi, Charleston, and Ft. Pierce*)
  - k. Admissions/enrollment (*Finding 16 of the ACCET Action Letter – Columbus, Savannah, Baton Rouge, Shreveport, and Phoenix*)
  - l. Student services (*Finding 17 of the ACCET Action Letter – Macon*)
  - m. Certification and licensing (*Finding 22 of the ACCET Action Letter – Birmingham, Jacksonville, and Richmond*)
6. With respect to other areas of noncompliance asserted by ACCET, the Council requires additional information to ensure the institution's compliance with ACICS standards:
- a. Mission (*Finding 1 of the ACCET Action Letter – Greensboro and Lubbock*)
  - b. Institutional management (*Finding 3 of the ACCET Action Letter – Greenville and Knoxville*)
  - c. Human resource management (*Finding 4 of the ACCET Action Letter – Biloxi, Chattanooga, and Knoxville*)
  - d. Communications (*Finding 5 of the ACCET Action Letter – Augusta, Biloxi, and Greenville*)
  - e. Financial assistance/scholarships (*Finding 7 of the ACCET Action Letter – Knoxville and Spartanburg*)
  - f. Educational Goals and Objectives (*Finding 8 of the ACCET Action Letter – Chattanooga, Greensboro, Greenville, Jackson, Knoxville, and Tulsa*)
  - g. Program/instructional materials (*Finding 9 of the ACCET Action Letter – Greenville and Richmond*)
  - h. Externship/internships (*Finding 10 of the ACCET Action Letter – Biloxi*)
  - i. Curriculum review/revision (*Finding 11 of the ACCET Action Letter – Ft. Pierce, Jackson, and Mobile*)
  - j. Instructional methods (*Finding 12 of the ACCET Action Letter – Biloxi, Greenville, Lubbock, Richmond, and Spartanburg*)
  - k. Learning resources, equipment and supplies (*Finding 13 of the ACCET Action Letter – Biloxi, Greenville, Jacksonville, Lubbock, Richmond, and Spartanburg*)
  - l. Supervision of instruction (*Finding 14 of the ACCET Action Letter – Greensboro and Knoxville*)
  - m. Instructor orientation and training (*Finding 15 of the ACCET Action Letter – Greenville and Spartanburg*)
  - n. Student progress (*Finding 19 of the ACCET Action Letter – GAA Myrtle Beach, Columbia, and Knoxville*)

- o. Student satisfaction (*Finding 20 of the ACCET Action Letter – GAA Phoenix, Knoxville, and Greenville*)
  - p. Employer/sponsor satisfaction (*Finding 21 of the ACCET Action Letter – Birmingham, Columbia, and Knoxville*)
  - q. Certification and licensing (*Finding 22 of the ACCET Action Letter – Knoxville*)
  - r. Completion and job placement (*Finding 23 of the ACCET Action Letter – Richmond*)
7. At the time of the Council’s May 8, 2018, show-cause directive, 15 of the institution’s campuses had been directed by ACICS to show cause why their approvals should not be withdrawn for below standard placement outcomes and 10 campuses had been placed on compliance warning for student achievement outcomes.

The institution has been able to provide updated placement verification data resulting in improved student achievement outcomes. Thus, since the May 8, 2018, letter was issued, ACICS has vacated 13 campus-level show-cause directives, placing the Birmingham campus on compliance warning, and has continued campus-level show-cause directives for Columbus and Macon, which remain under the ACICS standard placement rate of 60% based on placement verification records.

### **Council Action**

To allow the Council to obtain additional information for further monitoring of the institution’s compliance with ACICS *Accreditation Criteria*, the Council acted to continue the show-cause directive to the **December 2018** Council meeting.

In response to this continued show-cause directive, the institution must provide the appropriate in-writing show-cause review fee, as outlined in the Hearing/Review Fees section of the “Schedule of Fees” on the ACICS website, and notification of its intent to respond in writing, within ten (10) business days of receipt of this notice, by **September 21, 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. The institution must submit the following information via the current online show-cause application, no later than **October 31, 2018**:

1. **General:** A description of how the institution implements its mission and maintains compliance with ACICS Standard 3-1-100 (*Finding 1 of ACCET Action Letter*).
2. **Augusta:** Analysis and supporting documentation of student satisfaction results for all blended courses offered as part of Project Hawthorne and for the faculty members who instruct those courses (*Finding 5 of ACCET Action Letter*); and evidence that students

have adequate access to the technology required to complete out-of-class components of blended learning courses (*Finding 5 of ACCET Action Letter*).

3. **Biloxi:** Updated evidence that professional development for all members of the Biloxi faculty has continued to occur during 2018, including explanations of any extenuating circumstances when a faculty member has not attended professional development (*Finding 4 of ACCET Action Letter*); copies of faculty development plans for all Biloxi faculty members pursuant to ACICS Standard 3-1-543 (*Finding 4 of ACCET Action Letter*); analysis and supporting documentation of student satisfaction results for all blended courses offered as part of Project Hawthorne and for the faculty members who instruct those courses (*Finding 5 of ACCET Action Letter*); evidence that all Medical Billing & Coding externship sites have been reviewed by qualified personnel (*Finding 10 of ACCET Action Letter*); evidence that the Medical Assistant program currently in place at this campus includes hands-on clinical lab skills training (*Finding 12 of ACCET Action Letter*); and analysis and supporting documentation of student satisfaction results regarding the new lab equipment for the networking programs (*Finding 13 of ACCET Action Letter*).
4. **Birmingham:** Evidence that employer satisfaction surveys include appropriate questions as required by the definition of “employer satisfaction” in the ACICS *Accreditation Criteria* (*Finding 21 of ACCET Action Letter*).
5. **Chattanooga:** Current turnover rate of administration and faculty (*Finding 4 of ACCET Action Letter*); analysis and supporting documentation of student satisfaction results regarding campus leadership and faculty (*Finding 4 of ACCET Action Letter*); evidence that in-class and out-of-class activities support the amount of academic credit awarded for each course (*Finding 8 of ACCET Action Letter*); evidence of “pop-in” observations conducted in 2018 (*Finding 8 of ACCET Action Letter*); and evidence of implementation of new syllabus format across all classes (*Finding 8 of ACCET Action Letter*).
6. **Columbia:** Evidence of implementation of satisfactory academic progress policy (*Finding 19 of ACCET Action Letter*); and evidence of collection and assessment of employer satisfaction surveys (*Finding 21 of ACCET Action Letter*).
7. **Fort Pierce:** Evidence that Program Advisory Committee meetings are being conducted, including minutes of meetings (*Finding 11 of ACCET Action Letter*); and evidence of PAC feedback being incorporated into the curriculum (*Finding 11 of ACCET Action Letter*).
8. **GAA Myrtle Beach:** Evidence of implementation of satisfactory academic progress policy (*Finding 19 of ACCET Action Letter*).

9. **GAA Phoenix:** Evidence of completion and assessment of graduate satisfaction surveys (*Finding 20 of ACCET Action Letter*).
10. **Greensboro:** Evidence of compliance with instructor-to-student ratios in lab classes for Medical Assistant, Medical Billing and Coding Specialist, Medical Office Specialist, Network Support Technician and Pharmacy Technician programs (*Finding 8 of ACCET Action Letter*); evidence that any teaching assistants assisting in labs in 2018 have been appropriately qualified (*Finding 8 of ACCET Action Letter*); and evidence of faculty observations completed in 2018 (*Finding 14 of ACCET Action Letter*).
11. **Greenville:** Analysis and supporting documentation of student satisfaction with campus leadership and Project Hawthorne (*Findings 3, 5, and 20 of ACCET Action Letter*); evidence of program development and evaluation and instructional components for blended/hybrid programs offered as part of Project Hawthorne as required by ACICS Standards 3-1-513, 3-1-514, and 3-1-532 (*Finding 8 of ACCET Action Letter*); analysis and supporting documentation of student satisfaction with course materials including textbooks and e-books (*Finding 9 of ACCET Action Letter*); evidence of appropriate interaction between instructors and students and among students (*Finding 12 of ACCET Action Letter*); analysis and supporting documentation of student satisfaction with the new lab equipment for the networking programs (*Finding 13 of ACCET Action Letter*); and evidence of instructors' understanding of the pedagogy of blended learning and the integration of digital and classroom content (*Finding 15 of ACCET Action Letter*).
12. **Jackson:** Evidence that in-class and out-of-class activities support the amount of academic credit awarded for each course (*Finding 8 of ACCET Action Letter*); evidence of "pop-in" observations conducted in 2018 (*Finding 8 of ACCET Action Letter*); evidence of implementation of new syllabus format across all classes (*Finding 8 of ACCET Action Letter*); evidence that Program Advisory Committee meetings are being conducted, including minutes of meetings (*Finding 11 of ACCET Action Letter*); and evidence of PAC feedback being incorporated into the curriculum (*Finding 11 of ACCET Action Letter*).
13. **Jacksonville:** Analysis and supporting documentation of student satisfaction with U-Certify (*Finding 13 of ACCET Action Letter*).
14. **Knoxville:** Evidence of implementation of campus policies (*Finding 3 of ACCET Action Letter*); analysis and supporting documentation of student satisfaction with campus leadership and Project Hawthorne (*Findings 3, 4, and 20 of ACCET Action Letter*); updated turnover rate of administration and faculty (*Finding 4 of ACCET Action Letter*); evidence demonstrating competence and professional development of financial aid staff (*Finding 7 of ACCET Action Letter*); evidence that in-class and out-of-class activities support the amount of academic credit awarded for each course (*Finding 8 of ACCET Action Letter*); evidence of "pop-in" observations conducted in 2018 (*Finding 8 of*

- ACCET Action Letter*); evidence of implementation of new syllabus format across all classes (*Finding 8 of ACCET Action Letter*); evidence demonstrating completion of faculty evaluations in 2018 (*Finding 14 of ACCET Action Letter*); evidence of implementation of satisfactory academic progress policy (*Finding 19 of ACCET Action Letter*); evidence of collection and assessment of employer satisfaction surveys (*Finding 21 of ACCET Action Letter*); and updated pass rates for the National Certifying Examination for Surgical (CST exam) and evidence of assessment of such results (*Finding 22 of ACCET Action Letter*).
15. **Lubbock:** Evidence of appropriate interaction between instructors and students and among students in the Business Administration program (*Finding 12 of ACCET Action Letter*); and analysis and supporting documentation of student satisfaction with the new lab equipment for the networking programs (*Finding 13 of ACCET Action Letter*).
  16. **Mobile:** Evidence that Program Advisory Committee meetings are being conducted, including minutes of meetings (*Finding 11 of ACCET Action Letter*); and evidence of PAC feedback being incorporated into the curriculum (*Finding 11 of ACCET Action Letter*).
  17. **Richmond:** Analysis and supporting documentation of student satisfaction with course materials including textbooks and e-books (*Finding 9 of ACCET Action Letter*); analysis and supporting documentation of student satisfaction with U-Certify (*Finding 9 of ACCET Action Letter*); observations of faculty in Electrical Technician program demonstrating appropriate interaction between instructors and students and among students (*Finding 12 of ACCET Action Letter*); analysis and supporting documentation of student satisfaction results regarding the new lab equipment for the networking programs (*Finding 13 of ACCET Action Letter*); and evidence the institution has considered and addressed the “additional concerns” listed on page 55 of the ACCET Action Letter (*Finding 23 of ACCET Action Letter*).
  18. **Spartanburg:** Evidence of competence and professional development of financial aid staff (*Finding 7 of ACCET Action Letter*); evidence of appropriate interaction between instructors and students and among students (*Finding 12 of ACCET Action Letter*); analysis and supporting documentation of student satisfaction with the new lab equipment for the networking programs (*Finding 13 of ACCET Action Letter*); and evidence of instructors’ understanding of the pedagogy of blended learning and the integration of digital and classroom content (*Finding 15 of ACCET Action Letter*).
  19. **Tulsa:** Evidence that in-class and out-of-class activities support the amount of academic credit awarded for each course (*Finding 8 of ACCET Action Letter*); evidence of “pop-in” observations conducted in 2018 (*Finding 8 of ACCET Action Letter*); and evidence of implementation of new syllabus format across all classes (*Finding 8 of ACCET Action Letter*).

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Five hard copies of your response and one electronic copy via the show-cause application on the institution's account must be received by the date indicated above. Failure to provide all information requested by the Council may result in the withdrawal of your institution's accreditation.

With respect to the institution's compliance with ACICS student achievement standards (*Finding 2 of the ACICS Show-cause Directive*), the institution must continue to comply with the campus-specific directives for the campuses that remain on show-cause or compliance warning within the timeframes previously set forth by the Council.

The institution must also continue to keep ACICS apprised of any further actions taken by ACCET with regard to its appeal and application for initial accreditation.

As part of its upcoming renewal of accreditation, the institution will be hosting site visits for all of its campuses within the next nine months.

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

Further, to ensure that students will receive an appropriate outcome in the event of institutional closure, the institution must provide the Council with an updated student audit in the institutional teach-out plan. This update to the institutional teach-out plan must be completed as part of the institution's response to this continued show-cause directive.

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

The institution's ongoing attention and efforts toward continuous improvement are a very important component of its accredited status, and your responsiveness to this Council action letter is essential to a favorable outcome for both the campus and its students.

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

Sincerely,

A handwritten signature in cursive script that reads "Michelle Edwards". The signature is written in black ink and is positioned over a faint, circular watermark logo that features a torch and the text "ACICS".

Michelle Edwards  
President and CEO



Ms. Deana Southerland

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cc: Ms. Cathy Sheffield, Accreditation and State Liaison, U.S. Department of Education  
Ms. Tivoli Nash, Alabama Community College System (tivoli.nash@accs.edu)  
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