



April 16, 2019

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VIA EMAIL AND USPS DELIVERY

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Dr. Sinem Vatanartiran
President and CEO
Bay Atlantic University
1510 H Street NW, Suite 400
Washington, DC 20005

**Subject: Vacate Financial and Campus-Level Student Achievement Show-Cause Directives
Quality Assurance Monitoring Review – Place on Compliance Warning**

Dear Dr. Vatanartiran:

At its April 2019 meeting, the Council reviewed your institution's response to the show-cause directives issued in the letter dated February 27, 2019, and considered the testimony provided by the institution's leadership at the hearing on April 2, 2019. As a result of its review, the Council notes the following:

1. The institution submitted its 2018 Annual Financial Report (AFR), which included audited financial statements, and appropriately addressed all the concerns identified in the Council's letter which referenced the 2017 AFR submission.
2. The institution revised and submitted for approval its 2018 Campus Accountability Report (CAR), which did not, at the time of submission in November 2018, appropriately categorize graduates not available for placement; or submit placements through the Placement Verification Program (PVP) for verification and validation. As a result of this revision, the institution's placement rate for the 2018 CAR period is 76%.
3. The institution has appropriately submitted applications for its Change of Name (which has been approved) and for new associate's, bachelor's, and master's degree programs which the institution had advertised, but not enrolled students in, prior to its reinstatement. Concerning the PhD programs, the institution was advised, during the hearing, that ACICS could have only considered professional doctoral degrees prior to its decision to terminate its approval of such terminal degrees. Therefore, ACICS will not approve, nor can the institution offer (independently), PhD programs outside of ACICS' scope.

Further, the Council reviewed the institution's response to the four (4) findings remaining from the quality assurance monitoring visit for its out-of-scope bachelor's degree programs in

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international relations and economics. Two (2) of the findings have been resolved to the Council's satisfaction. As a result of its review, the Council found the following based on the *Accreditation Criteria*:

1. An official qualifying transcript for one faculty member is still missing (Section 3-1-542). The institution provided evidence of the instructor's attempt to obtain a copy of her transcripts from Université de Toulouse-Le Mirail in France, but no response from the foreign institution was submitted. The instructor, ██████████, shared that she will be traveling to France and will obtain a copy during that time. In the interim, the institution sought to make the case that ██████████'s almost 20-year teaching tenure at George Washington University in its French Language Program should suffice. An attestation from the director of the program was submitted to indicate that ██████████ has taught introductory, intermediate, and advanced-level French courses. However, given that ██████████ is teaching a general education course, evidence of actual coursework in the subject is required to evidence qualification to teach, consistent with Section 3-5-302.
2. Current faculty development plans do not appropriately include in-service and professional growth activities and provide evidence of implementation for all faculty members (Section 3-1-543). The institution provided revised 2018–2019 plans, along with the original documents from 2018. A coversheet and the plan for each faculty member identified which activities were in-service training and which were professional growth, as well as if they were completed and documented to date. However, many copied documents were difficult to read, and the following issues were noted:
 - a. The “Venezuela in Crisis” and “The Decentralized Future and Web 3.0 Impact,” *among others* provided in 2018, are not professional growth activities, as they were facilitated by the institution's related Global Policy Institute partner. According to the *Accreditation Criteria* Glossary definition of in-service, these are in-service training activities, as they were sponsored by the institution. Additionally, “Implementing Global Fluency in the Classroom,” and “ItsLearning” are also in-service training activities, especially in terms of their content matter. The institution identified the same activities (as summarized in the cover document) as in-service and professional growth for different faculty members.
 - b. ██████████ – missing a copy of her membership in the American Council of the Teaching of Foreign Languages and evidence of having taken instructional design courses at George Washington University.
 - c. ██████████ – missing evidence of the October 2, 2018, Washington Post Cybersecurity Summit.
 - d. ██████████ – missing evidence of “ItsLearning,” completed on October 11, 2018.
 - e. ██████████ – all listed professional growth activities are in-service

trainings, and documentation of only one activity was provided (“Implementing Global Fluency”). The “Negotiation Skills Workshop,” if it were not an in-service activity, is also not appropriate professional growth for ██████████’s teaching specialization – English. Additionally, documentation was not provided for her completion of the “Venezuela in Crisis” in-service.

- f. ██████████ – missing evidence of membership in Middle East Studies Association.
- g. ██████████ – missing evidence of completion of “Program in Management and Economics” (January 2019). Other activities listed for professional growth are also in-service activities, as they are those sessions presented by the institution’s Global Policy Institute partner.
- h. ██████████ – missing evidence of planned attendance at Society of Risk Analysis and Society of Benefit and Cost Analysis conferences; ██████████’s article/presentation at the Transportation Research Board (January 2019) and presentation at the National Academy of Science (June 2018) also were not documented as indicated.

Council Action

Therefore, the Council acted to vacate the continued financial show-cause and the student achievement show-cause directives and place the institution on compliance warning for its quality assurance monitoring review. The Council requires the following information prior to its August 2019 meeting:

1. A copy of ██████████’s official transcript for her bachelor’s degree in French studies from Université de Toulouse-Le Mirail, as well as a translation, and evaluation of the transcript by AACRAO or a member of NACES or AICE; or formal communication from the foreign institution that it is unable to provide a copy of ██████████’s transcripts given that she graduated in 1985. This communication should include an attestation by the university as to ██████████’s conferred undergraduate credential.

Alternatively, as the institution indicated it will remove ██████████ from the instruction of French general education courses if her transcript cannot be procured, evidence of its Summer 2019 course schedule with a replacement instructor for the French course(s).

2. Revised, current faculty development plans and/or evidence of implementation for the faculty members identified above, as well as current faculty development plans for any new faculty members hired for the Summer 2019 term.

The information listed above must be received in the Council office electronically by **June 28, 2019**. 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 institution and its students.

Dr. Sinem Vatanartiran

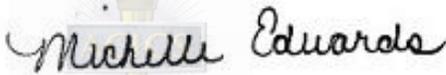
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The Council is obligated to take adverse action against any institution that fails to come into compliance within established time frames without good cause, pursuant to Title II, Chapter 3, Introduction of the *Accreditation Criteria*. The institution is reminded that all references concerning its doctoral degree programs must be eliminated from all webpages, publications and media channels. Public disclosure concerning the show-cause can also be removed at this time.

If you have any questions about this action, please contact Ms. Perliter Walters-Gilliam at 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.

Michelle Edwards
President and CEO

c: Ms. Cathy Sheffield, Accreditation and State Liaison, U.S. Department of Education
Ms. Angela Lee, District of Columbia Higher Education Licensure Commission
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