



May 3, 2024

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

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

Dear Mr. Johnston:

At its April 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 January 3, 2024 Commission letter, which deferred reaccreditation, resulting from a review of the application for reaccreditation, the team report (visit conducted on October 17–18, 2023), and the institution's response to that report, received November 28, 2023. The December 2023 action deferred reaccreditation for one cycle and directed the institution to provide an interim report regarding Standards II.D – Records, III.B – Financial Procedures, IV.B – Program/Instructional Materials, IV.D – Curriculum Review/Revision, VII.A – Recruitment, VIII.A – Performance Measurements, VIII.B – Attendance, VIII.C – Student Progress, IX.A – Student Satisfaction, and IX.D – Completion and Job Placement.

Further, the Accrediting Commission directed a two-person, one-day, unannounced follow-up visit to take place in the April 2024 review cycle to further evaluate those serious concerns originally cited on the October 17-18, 2023 reaccreditation visit team report. The on-site team reviewed the Standards as identified in the January 3, 2024 Commission action letter.

As a result of its review of the institution's interim report dated January 31, 2024, the unannounced visit team report (visit conducted February 14, 2024), and the institution's response to that report (dated March 26, 2024), the Commission voted to defer consideration for an additional cycle, and directed a two-day, two-person follow-up visit to be conducted in the August 2024 visit cycle. This action continues the institution's accredited status, pending further review at its August 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 Commission further voted to issue 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.

While the institution's interim report resolved some concerns relative to Standards IV.B, IV.D, VII.A, and VIII.A, its responses to the reaccreditation team report, interim report, and follow-up visit report, indicated a pattern of outdated policies, system errors, duplicate records, clerical errors, and general mistakes related to the administrative capabilities of running an institution. In addition, the February 14, 2024, follow-up visit report outlined additional concerns and noted inconsistencies, as detailed in this letter, between the institution's interim report submitted on January 31, 2024, and what was observed on-site two weeks later.

In its response to the reaccreditation team report, the institution noted multiple clerical errors leading to compliance issues with Standard III.B, multiple system errors leading to compliance issues with Standard II.D and VIII.B, multiple duplicate records that were not corrected until the ACCET team was on-site, and mistakenly uploading incomplete files for review by the team. In its follow-up visit team report response, the institution noted that "due to the unexpected timing, nature, and circumstances of the unannounced site visit, the team couldn't witness the successful implementation and results of our corrective measures across various areas" and that "the unexpected timing, nature and circumstances of the unannounced site visit prevented the team from observing the system's organization, accuracy, orderliness, and currency."

The Commission reminds the institution that demonstrating successful implementation of institutional policies, organization, accuracy, and corrective measures is not dependent on advance notification that an ACCET team will be on-site. Per ACCET Document 1 – The Accreditation Process, "Integrity is a central, indispensable, and defining characteristic of a quality institution demonstrated by the operation of the institution and its programs in accordance with ACCET Document 2.1 – Principles of Professional Ethics for ACCET Institutions."

Therefore, the Commission issued an Institutional Show Cause directive and directed the institution to submit an interim report for review by the Commission and use by the team during the Commission-directed unannounced, two-person, two-day follow-up visit. The interim report must include narrative responses and relevant exhibits, such as those provided in an ASER submission, regarding the following standards:

1. Standard II.D - Records

The team report for reaccreditation and subsequent interim report identified significant issues in record-keeping for which the institution cited clerical errors. Therefore, the institution is directed to provide a narrative update to address the following:

- **The institution indicated in its Interim Report dated January 31, 2024, that it had ended the offering of free trial classes; however, the follow-up visit team report indicated students were present in classrooms for a free trial class. The institution is directed to provide an explanation of why there were "trial students" in class at the time of the follow-up visit, after the Commission was informed that no additional trial classes would be offered.**

- The institution indicated that a system error led to missing June 2023 attendance records for two students [REDACTED] therefore, the institution is directed to provide an explanation, with supporting evidence, describing the error and the subsequent actions to correct the error, and an explanation of how accurate attendance data was retrieved, and actions taken to ensure the integrity of attendance data going forward.
- The institution's vacation request form asks if a student is expecting to return after vacation. The institution stated, "Moreover, AOI does not grant students vacation in lieu of or in addition to a grace period." However, evidence in submitted files indicates that students are granted vacation even when they notify the institution that they do not plan on returning after their vacation period, essentially granting a vacation as a grace period. Therefore, the institution is directed to update this policy and form and provide evidence of such, along with appropriate staff training and student notifications.
- The institution's Leave of Absence policy does not include all required elements of ACCET Document 36.IEP including the terms of the leave or vacation, the length and frequency of approved leave or vacation, and if the leave is considered leave of absence, medical leave (reduced course load), or vacation as defined in Document 36.IEP and consistent with terms published by SEVP. Further, the Medical Leave of Absence policy does not align with Document 36.IEP and SEVP expectations, which indicate that a student must submit leave requests and medical documentation. The institution's policy states, "Satisfactory documentation shall be from a verifiable source other than the student and can include a note from a health care provider." Therefore, the institution is directed to update this policy and provide evidence of such, along with appropriate staff training and student notifications. Further, the institution is directed to provide a narrative explanation of the process for approving student requests of leaves of absence for a medical reason, or leave of absence to leave the country, including steps taken in SEVIS.
- Provide student lists from the institution's SEVIS portal and internal record-keeping system to include all active, terminated, and withdrawn students at the time of report submission.
- Describe the system(s) by which records are stored and secured to ensure ready access and review while protecting from unauthorized access and undue risk of loss. Provide the institution's policy for ensuring the confidentiality of student records.
- Describe how the institution ensures that student records are maintained in an accurate, orderly, and up-to-date manner. Identify who is responsible for creating, maintaining, and periodically auditing these records. Describe any recent efforts to audit records for accuracy and provide the institution's recording-keeping policy.
- Indicate whether each of the following types of information (if applicable) is maintained electronically, in hard copy, or both electronically and in hardcopy: (a) admissions (e.g., entrance exams, HS/GED transcripts, college credit transfer, student visa information), (b) enrollment agreements, (c) student accounts, (d) student grades/transcripts, (e) attendance, (f) counseling, and (g) placement.

2. Standard III.B – Financial Procedures

The team report for reaccreditation and subsequent interim report identified significant issues in record-keeping relative to the determination and calculation of refunds for students who canceled, withdrew, or were terminated. In its interim report, the institution explained these discrepancies as clerical errors. The institution is directed to provide a narrative update to include the following:

- Provide a narrative explanation for the frequency of clerical errors found in financial files during the on-site visit for accreditation, as well as an explanation and documentation of the credit provided to student [REDACTED], including communication about the credit and a calculation of how the credit was determined. Further, the institution is directed to explain why the student's ledger was updated only after it was pointed out by a third-party that the dates didn't match.
- Examples of other credits provided to students as well as a policy regarding the documentation and calculation of credits.
- Describe how the institution monitors, analyzes, and controls its financial operations, including (a) the controls implemented by the institution to ensure that sound and ethical financial practices are followed and (b) the individuals who are responsible for financial monitoring and the functions and authority of each. Attach a copy of the written policies for proper financial controls and supervision of financial management staff.
- Describe the process for receiving and depositing student funds as well as providing proof of payment. Attach a copy of the policy and procedures governing the documentation of student accounts.
- Attach a copy of the institution's cancellation and refund policies, compliant with ACCET Document 31 – Cancellation and Refund Policy, and, if required, applicable state regulations. If contractual agreements exist with companies or other sponsoring organizations, describe the impact of such agreements on these policies, if any.
- Attach a copy of the institution's written procedure for processing refunds.

3. Standard VII.A – Recruitment

The institution described the events that led to the display of outdated brochures, as well as issues with its website. However, it is still unclear what version of the institution's catalog is current and up-to-date. In its response to the follow-up visit team report, the institution included a version of the catalog labeled 2024. However, the footer indicated that it was revised in 2023. On its website, there is a version of a 2024 catalog, as well as a 2023 version.

In addition, the institution's address is incorrect on internet search results, as well as on some social media, such as LinkedIn. These continued issues do not demonstrate that the institution has exercised "due diligence to ensure that clear and accurate information is provided to prospective, current and former students, the public, and all interested parties and to guard against any misrepresentation," as required by ACCET Document 30 - Policy on Recruiting, Advertising, And Promotional Practices. Therefore, the institution is directed to provide a narrative update to include the following:

- **The institution's current catalog as provided to prospective students and posted on its website.**
- **Describe how the institution advertises and promotes its education/training, to include all means and media utilized (e.g., print media, radio, TV, direct mail, brochures, website, social media, and the internet). Identify the URL for the institution's website(s) and social media. Attach a copy of all print materials and promotional brochures.**
- **Who is responsible for coordinating and monitoring marketing for the institution? How does the institution ensure that informational and promotional materials make only justifiable and provable claims in compliance with ACCET Document 30 – Policy on Recruiting, Advertising, and Promotional Practices, and any applicable state or federal regulations? Attach a copy of the written policies and procedures to ensure such compliance.**

4. Standard VIII.B – Attendance

The team report for reaccreditation, subsequent interim report, and the follow-up visit team report identified significant issues in record-keeping relative to attendance. Therefore, the institution is directed to provide a narrative update to include:

- **A copy of the institution's written attendance policy, consistent with Document 35 – Policy on Attendance Requirements, to include (a) a minimum attendance requirement of at least 80%, (b) provisions for tardies and early departures, (c) policy relating to makeup work, if applicable, (d) a description of excused absences, if applicable, and (e) maximum consecutive absences.**
- **Describe how attendance requirements and documented attendance performance are communicated to students in a timely and informative manner. If a student fails to meet the minimum benchmarks for attendance performance, what are the ramifications (e.g., probationary status, repetition of a course(s), or termination)?**
- **How is student attendance and tardiness recorded in the classroom? How, when, and by whom is this information collected and documented in students' records? Attach examples of various attendance documentation for five current students, including all documents and forms utilized by the institution to track daily/weekly individual attendance.**

- **What processes are in place to ensure that attendance records are reliably and accurately maintained?**

5. Standard VIII.C – Student Progress

The follow-up visit report indicated that the institution's Satisfactory Academic Progress policy was not compliant with ACCET Doc 18.IEP, and that the institution failed to demonstrate that student progress is effectively monitored, assessed, and recorded, utilizing a sound and clearly defined assessment system established by the institution. Furthermore, the institution failed to document that student records related to student progress are consistently and accurately maintained with significant errors and omissions noted in student records.

In its response, the institution provided an updated SAP policy and several student files. The institution's classes are designed to be completed in 12 weeks, or three four-week sessions. However, the Commission noted that student files continue to lack clarity and documentation. In the listed examples below, no students have failed their classes, yet were allowed to repeat or continue in a class beyond the initial 12 weeks. There was no evidence provided of a policy regarding repeating successfully passed classes.

- [REDACTED] no grade for Level 6, December 22, 2023, LDA 12/8/23
- [REDACTED] student completed 24 weeks in Level 6, with passing grades (D, C, B, B, B, B)
- [REDACTED] student completed 24 weeks in Level 6 with passing grades (B, B, B, B, B, B)
- [REDACTED] student completed 24 weeks in Level 6 with passing grades (B, C, B, A, B, A)
- [REDACTED] student completed 24 weeks in Level 5 with passing grades (no grade for May 31 – June 24, 2022) (B, B, B, B, B); six months in Level 6 with passing grades (B, B, B, B, B, B); six months in ACC with passing grades (B, B, B, B, B, B)
- [REDACTED] student completed 20 weeks in Level 4 with passing grades (B, B, C, B, B)
- [REDACTED] student completed 16 weeks in Level 4 with passing grades (B, A, B, B); four months in Level 5 with passing grades (B, B, A, B)
- [REDACTED] student completed 20 weeks in TOEFL with no documentation of reason for repeating
- [REDACTED] student completed 16 weeks in Level 5 with passing grades (B, B, A, B)

Further, the follow-up visit report indicated that the institution posted its revised SAP policies in classrooms at the time of the visit, indicating that the institution is not auditing published policies as they are amended. Therefore, the institution is directed to provide a narrative response to include the following:

- **Provide a revised policy and procedure for updating published policies in all locations (online, on-site, etc.) to ensure accurate and updated information is made available to**

students, faculty, and staff. Provide documentation relative to staff training on the new policy.

- Provide the institution's published policy on repeating levels and documentation relative to staff training on this policy.
- A copy of the written policy used to monitor, assess, and record student progress, consistent with the institution's assessment system. How does the institution implement the policy in a systematic and effective manner to ensure that student progress is monitored timely and accurately? What procedures are used to record grades, and who monitors student records to determine student progress?
- Describe how progress is communicated to students in a timely and informative manner. If a student fails to meet the minimum benchmarks for academic progress, what are the ramifications (e.g., probationary status, repetition of a course(s), or termination), and how is the student made aware of any required action?

6. Standard IX.D – Completion and Job Placement

In its interim report, the institution provided updated policies and procedures relative to tracking completion, including responsible parties, timelines, and procedural steps, as well as evidence of staff training and completion rates for November 15, 2023–January 15, 2024. However, to demonstrate systematic and effective implementation over time of the updated policies and procedures, the institution is directed to provide the following:

- **Completion rates for partial year 2024 (January 1 –April 30, 2023).**

7. Institutional Show Cause and Follow-up Visit

The Commission further voted to issue an Institutional Show Cause directive, requiring the institution to show cause why its accredited status should not be withdrawn, as a result of continued concern relative to the institution's ability to comply with operational and governance standards in accordance with ACCET policies, and an unannounced two-person, two-day follow-up visit to be conducted in the August 2024 visit cycle. A show cause directive requires the institution to provide the following:

- **A 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 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 May 10, 2024.**
- **The institution is directed to provide its training schedule for June 1 – August 31, 2024.**

The institution's response, including the attached **interim report cover sheet**, must be uploaded (link provided below) no later than **May 31, 2024**, for the institution's report to be considered further at the Commission's August 2024 meeting. Please see the attached submission instructions. Additionally, an invoice for the two-person, two-day follow-up visit is included in this letter, with a due date of May 31, 2024.

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.

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

RH/ek

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