



Accrediting Commission of Career Schools and Colleges

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[www.accsc.org](http://www.accsc.org)

September 11, 2023

**ELECTRONIC DELIVERY**

██████████  
Chief Executive Officer  
International Education Corporation  
16485 Laguna Canyon Road  
Irvine, California 92618

*System-Wide Continued Warning*

- Re:
- UEI College – Fresno, California (School #M066364)
  - UEI College – Gardena, California (School #M070735)
  - UEI College – Riverside, California (School #B072331)
  - UEI College – Bakersfield, California (School #B072368)
  - UEI College – Sacramento, California (School #B072790)
  - UEI College – Tacoma, Washington (School #B076002)
  - United Education Institute – Las Vegas, Nevada (School #B072812)
  - United Education Institute – Stone Mountain, Georgia (School #B076006)
  - United Education Institute – Dallas, Texas (School #B076011)
  - United Education Institute – Albuquerque, New Mexico (School #B076013)

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At the August 2023 meeting, the Accrediting Commission of Career Schools and Colleges (“ACCSC” or “the Commission”) considered the Commission’s previous decision to place the above-listed schools on System-Wide Warning. In making this decision, the Commission considered:

- The Commission’s May 23, 2023 System-Wide Warning Letter;
- IEC’s May 24, 2023 Letter regarding the system’s response to the United States Department of Education (“the Department”);
- IEC’s June 12, 2023 Letter regarding the system’s presentation to the Florida Commission for Independent Education (“CIE”);
- IEC’s June 30, 2023 System-Wide Warning Response; and
- IEC’s July 20, 2023 notification of the California Attorney General’s Investigative Subpoena.

Upon review of the above, the Commission voted to continue the above-listed schools on **System-Wide Warning** with a subsequent review scheduled for ACCSC’s February 2024 meeting. The reasons for the Commission’s decision and the Commission’s requirements for the school to demonstrate compliance are set forth below.

**History of the Commission’s Review:**

**May 2023**

At the May 2023 meeting, the Commission considered:

- ACCSC’s April 13, 2023 Letter;
- International Education Corporation’s (“IEC”) response;

- The press release regarding the United States Department of Education’s (“the Department” or “USDE”) decision to deny recertification of Florida Career Colleges’ (“FCC”) participation in Title IV federal student financial aid programs; and
- The Department’s April 11, 2023 letter.

The Commission considered IEC’s response to the Commission’s April 13, 2023 letter. The Commission’s letter requested information on the basis that the Department’s press release stated that IEC employees and senior leaders knew of, and encouraged violations of, ability-to-benefit (“ATB”) testing and that IEC owns the above-listed ACCSC-accredited institutions (“the schools”). The Commission stated that “[t]he Department’s findings that IEC employees and senior leaders knew and approved of violations of ATB regulations raises immediate questions regarding whether the above referenced schools owned by IEC and accredited by ACCSC meet this standard (April 13, 2023 Commission Letter, pg.2). ACCSC requested IEC to address questions regarding the schools’ owners, members of school management, and administrative employees and to demonstrate a commitment to providing quality education to students; ethical, fair and honest practice; and compliance with accrediting standards and applicable federal, state, and local requirements (*Section I (A)(2), Substantive Standards, Standards of Accreditation*). ACCSC also requested information as to whether the schools had been contacted by the Department, information and clarification as to shared oversight, management, or performance of ATB testing between FCC and the schools, policies and procedures for ATB testing, and a breakdown by campus of ATB enrollment.

IEC responded stating that the Department’s decision was limited to FCC<sup>1</sup> and that while the Department had not contacted any of the schools regarding this matter, UEI’s Eligible Career Pathways Program (“ECPP”) had been under audit by the Department but that the Department did not indicate any ECPP or ATB findings in a March 9, 2022 email or in a May 2, 2022 exit interview. The Department then informed IEC that the audit was extended in 2023. IEC stated that the decision was made to voluntarily pause ATB enrollments and testing at the schools as of April 13, 2023 “out of an abundance of caution to allow the opportunity to re-evaluate our policies and processes regarding the ECPP program” (April 26, 2023 IEC Response, pg. 8). IEC explained that per 34 CFR § 668.142 the school group uses entirely separate third parties to administer the ATB tests, contracting ██████████ (“T█████████”) to administer the tests (with Accuplacer replacing Wonderlic in 2022) for both FCC and the above-listed schools. IEC described the training of its admissions staff and provided documentation of the training in its response to the Commission. Regarding shared management and administrative staff between FCC and the above-listed schools, IEC identified one Regional Vice President of Operations (Sunbelt region) with oversight of five FCC campuses and one United Education Institute campus in Stone Mountain, Georgia. IEC provided a copy of its policies and procedures for ATB testing and admissions, enrollment, and re-entry which include the requirement for scheduling ATB tests for applicable students. IEC also stated that it had not received any formal or informal complaints regarding ATB testing and provided a breakdown by campus of the ATB enrollments at the schools.

In reviewing the submitted information and management and organizational chart, the Commission noted that the management and administrative organizational chart shows a Regional Vice President with oversight of both FCC campuses and a United Education Institute campus. The chart provided, however, appeared to be incomplete as it does not contain ██████████ or any other individual in the CEO role. Additionally, the Commission noted that the Department’s audit of the UEI groups ECPP program is ongoing.

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<sup>1</sup> The Commission understands that FCC has appealed the Department’s decision and signed an agreement with the Department extending FCC’s certification to January 31, 2024.

### **USDE Findings and Decision Subsequent to the May 2023 Commission Meeting:**

Subsequent to the Commission's May 2023 decision, ACCSC became aware of the Department's April 11, 2023 letter<sup>2</sup> sent to ██████████ in regard to Florida Career College – Denial of Recertification Application to Participate in the Federal Student Financial Assistance Programs. While this letter details the Department's findings regarding FCC, the letter also contains specific allegations regarding both IEC and the ACCSC-accredited schools listed above.

The Department alleges IEC's influence over test administration and proctoring to be inconsistent with requirements for independent test administrator ("ITA") or proctor independence. Specifically, the Department's letter states:

*IEC paid for a trainer to conduct in-person training for FCC and UEI proctors, and three former proctors reported that this training taught and encouraged misconduct. The contract ("Training Proposal") executed by IEC states "The purpose of this proposal is to have [Proctor 21] provide the proper training to all FCC & UEI campuses. She has the expertise that will create better performance so that we can quickly start to see an increase in passing rates." The plan provides for "in-person training to each individual proctor" at a rate of \$60 per hour, funded by the school, rather than their purported employer, ██████████ (USDE Letter April 11, 2023, pg. 15).*

Importantly, the letter specifically references a proctor at UEI campuses in California changing answers:

*Proctor 20, who is related to ██████████ and who proctored tests at UEI's California campuses in 2018 and 2019, stated that she was terminated at the direction of UEI officials when she failed to change answers and "cheat" on the ATB exam. She stated this came at the direction of "██████████." Proctor 20 further stated that ██████████ and his company to pass students and that if he did not, they would fire him (Id., pg. 9).*

The Department's letter further notes Proctor 20's experience at UEI:

*Proctor 20 reported that IEC directed ██████████s to assist students on the ATB exam to ensure students passed. Proctor 20 reported "IEC corporate controlled Art by saying that if they didn't ensure pass rates by cheating, then they would give the contract to someone else." She stated that ██████████ would teach new proctors how to assist students and told them that the expectation was to pass students (Id., pg. 18).*

Proctor 20 made a complaint to Wonderlic wherein "she specified that this conduct occurred at FCC schools in Orlando, Florida and Houston, Texas, in addition to other schools operated by IEC in California and Georgia" (Id.).

The Department's letter further notes the continuing practice of proctors sending score reports to FCC and/or UEI admissions staff even after ██████████ instructed proctors that there should not be more communication between proctors and admissions staff and IEC instructed admissions staff to cease communications with proctors (Id., pg. 19). Moreover, the Department alleged that the independent nature of ██████████ "was largely a fiction," contradicting IEC's assertion to ACCSC and even that the Department's investigation included "evidence suggesting IEC and FCC leaders attempted to interfere in the Department's investigation" (Id., 35).

The Department's letter also identifies an October 20, 2022 FSA Investigations Group communication to FCC containing a summary of evidence. Accrediting standards require that each accredited school and each

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<sup>2</sup> Available publicly at this link: <https://www2.ed.gov/policy/gen/leg/foia/florida-career-college-denial-apr-2023.pdf>

applicant for initial accreditation must notify ACCSC of any material event, such as investigations or open actions by state or federal authorities, beyond those required in the normal course, related to a school's licensure, approval to operate, program approval(s), or participation in federal programs (e.g., issuance of a Civil Investigative Demand or subpoena by a state or federal agency). Such notification must be in writing, made within 10 calendar days of the event's occurrence, and is in addition to disclosures that are required in the applications for initial or renewal of accreditation or any substantive change report (*Section V (E)(1) & Section V (E)(2)(g), Rules of Process and Procedure, Standards of Accreditation*). If the Department's October 20, 2022 communication to FCC contained reference to IEC senior leadership or any reference to UEI – which given the content of the April 13, 2023 letter seems likely – then certainly this should have been considered a material event and thus required notification to ACCSC within ten days. IEC made no notification to ACCSC after the October 20, 2022 communication, potentially violating the requirements of *Section V (E)(1) & Section V (E)(2)(g), Rules of Process and Procedure, Standards of Accreditation*.

A review of the Department's April 11, 2023 letter gives much clearer information than first reviewed by the Commission in the press release. The Department's findings and allegations call into question the schools' compliance with the following ACCSC standards (in addition to those cited above):

- *Section I (G)(1), Rules of Process and Procedure, Standards of Accreditation:* The burden rests with the school to establish that it is meeting the standards and a school must supply the Commission with complete, truthful, and accurate information and documentation showing the school's compliance with all accrediting standards if the school is to be granted and maintain accreditation.
- *Section I (G)(2)(a&d), Rules of Process and Procedure, Standards of Accreditation:* In order for a school to maintain its eligibility for accreditation, it must comply on a continuous basis with accreditation standards and requirements and maintain all necessary authorizations from the state(s) in which it operates and maintain compliance with all applicable local, state, and federal requirements.
- *Section V (A)(1), Substantive Standards, Standards of Accreditation:* The schools must develop admissions criteria that are designed to admit only those students who are reasonably capable of successfully completing and benefiting from the training offered.
- *Section V (A)(3), Substantive Standards, Standards of Accreditation:* A school must consistently and fairly apply its admissions requirements.
- *Section V (B)(1), Substantive Standards, Standards of Accreditation:* If the school enrolls a person who does not possess a high school diploma or recognized equivalency certificate, the school must determine the applicant's ability to benefit from the training offered confirmed by documentation of the applicant's achievement of an approved score on an appropriate.
- *Section V (B)(2), Substantive Standards, Standards of Accreditation:* The acceptable score to enroll on the ability-to-benefit test must ensure that students will benefit from the training provided and that a substantial number of students will complete the training and be employed in the field for which training was provided.

The Department's investigation and action has created questions regarding the schools' compliance with accrediting standards. The issues set forth demand the Commission's heightened scrutiny and as such the Commission elected to take additional steps and voted to direct IEC to cease all ATB testing and enrollment at each of the schools until such time as the Commission releases IEC from this directive. Additionally, the Commission questioned the timing of IEC's cease enrollment directive and whether the Commission's letter or other information spurred that action, (i.e., why did IEC not make this decision sooner knowing of the Department's investigation and findings at FCC.) Furthermore, the Commission voted to hold in abeyance any awards of accreditation at the above-listed schools until this issue is resolved. Finally, the Commission noted its interest in reviewing the disposition of the school's ATB students (their retention, graduation, and

employment rates) and requested detailed campus-by-campus data in these areas. The Commission scheduled its next review of this matter for its August 2023 meeting.

### **August 2023 Meeting Review and Action:**

The Commission considered IEC's response to the Commission's May 23, 2023 letter. The Commission's letter requested an updated Management and Administrative Organizational Chart, updates as to the Department's audit over UEI's ECPP program and a copy of an October 20, 2022 FSA Investigations Group communication to FCC, clarification as to the timing of IEC's cease enrollment and testing of ATB students, information on how IEC evaluates the character of its owners, management, and administrative employees, information regarding any internal review of ATB processes, documentation of IEC's compliance with the accrediting standards referenced on pages 4 and 5 of this letter, justification as to IEC's compliance with ACCSC notification requirements, student achievement data, contingency teach out plans, and any additional information IEC felt that may be supportive to the group's compliance with ACCSC accrediting standards.

As an initial matter, the Commission reviewed IEC's response to the questions posed regarding the owners, members of school management, and administrative employees and their commitment to providing quality education to students; ethical, fair and honest practice; and compliance with accrediting standards and applicable federal, state, and local requirements (*Section I (A)(2), Substantive Standards, Standards of Accreditation*). IEC's response includes an updated Management and Administrative Organizational Chart as well as short biographies of each of IEC's board of directors. IEC's response states that the Board of Directors operates in an oversight capacity with the duty to manage IEC's corporate officers and has fiduciary responsibilities under Delaware corporate law. IEC noted that the board meets four times a year and operates subcommittees including committees on governance and compliance. Below the board level, IEC uses multiple compliance teams and multiple lines of reporting issues for employees and students. IEC also provided the code of conduct required for any staff with recruitment responsibilities.

Following the Department's October 20, 2023 letter, IEC stated it had retained the services of an outside law firm to review the organization's ECPP program and provided the result of the review which states that for the three campuses reviewed, the "investigation uncovered no evidence that the practices the Department alleged FCC employees to have participated in or encouraged with respect to ATB testing exist today" (June 30, 2023 IEC Response, pg. 382).

IEC also described its history of compliance with ACCSC, the Council on Occupational Education ("COE"), and the Accrediting Council for Continuing Education and Training which included a description of COE's May 2020 Notification of Apparent Deficiency which constitutes ongoing monitoring. IEC further noted the ongoing talks with the Department to extend FCC's certification, FCC's recent provisional grant by the Florida Commission for Independent Education ("CIE")<sup>3</sup>, and the recent action by the Arizona State Board for Private Postsecondary Education ("AZPPSE") to issue an annual license to UEI Mesa with stipulations and a civil fine of \$1,000 due to the non-submission of required quarterly reports. Under normal practices, AZPPSE also increased the required bond amount for both UEI Mesa and Phoenix from [REDACTED]

IEC also notified ACCSC of an investigative subpoena from the California Attorney General pursuant to the Department's action against FCC. While the Commission recognized IEC's history of compliance efforts across multiple states and accreditors, the allegations raised by the Department, although vigorously contested by IEC<sup>4</sup>, support an ongoing review regarding IEC's specific efforts to show its commitment to ethical, fair, and honest practice. In addition, the Commission acknowledged IEC's narrative regarding its

<sup>3</sup> Provisional status on account of changes to FCC's financial soundness.

<sup>4</sup> As noted in IEC's May 24, 2023 and September 5, 2023 letters to ACCSC.

Board’s commitment and its internal processes, but found the ongoing nature of the Department’s investigation, attention<sup>5</sup>, and potential decision warrant the Commission’s ongoing review.

Accrediting standards require that each accredited school must notify ACCSC of any material event, such as investigations or open actions by state or federal authorities, beyond those required in the normal course, related to a school’s licensure, approval to operate, program approval(s), or participation in federal programs (e.g., issuance of a Civil Investigative Demand or subpoena by a state or federal agency). Such notification must be in writing, made within 10 calendar days of the event’s occurrence, and is in addition to disclosures that are required in the applications for initial or renewal of accreditation or any substantive change report *Section V (E)(1) & Section V (E)(2)(g), Rules of Process and Procedure, Standards of Accreditation*). The Commission previously noted that IEC may have failed to fulfill the requirements under *Section V (E)(1) & Section V (E)(2)(g), Rules of Process and Procedure, Standards of Accreditation* due to late notification. In response, IEC agreed it had erred in not notifying the Commission in a timely manner and affirmed IEC’s commitment to timely notification and response to the Commission. IEC provided a history of the system’s on-time responses to ACCSC requests for information and noted its recent notifications to ACCSC. Although the Commission acknowledged IEC’s recent attention to ACCSC notification requirements and responsiveness to Commission requests, the school’s response does not fully absolve IEC’s of its shortcoming in this area.

The Commission’s May 23, 2023 letter requests ATB student achievement data and analysis of that data and IEC’s June 30, 2023 response provides the requested information. While the Commission requests and reviews data in the aggregate, as pointed out by IEC, the Commission also requires that schools develop admissions criteria that are designed to admit only those students who are reasonably capable of successfully completing and benefiting from the training offered (*Section V (A)(1), Substantive Standards, Standards of Accreditation*). IEC requires a successful score on its Digital Readiness Assessment and Wonderlic Basic Skills Test or Accuplacer for its ATB students and stated that the required test scores “ensure that students will benefit from the training provided and that a substantial number of students will complete the training” (*Id.*, pg. 41). Disaggregated data submitted by IEC show that ATB students do not prevail at the same rate as non-ATB students and that the rate of ECPP ATB completion does not appear to be substantial:

Campus	Average % of Withdrawn/Terminated ATB/ECPP Students Across Reported Data	Average % of Withdrawn/Terminated Non-ATB/ECPP Students Across Reported Data	% Increase of Enrollment	Years of Data
Bakersfield	47.83%	27.00%	77.58%	6 years (2016-2022)
Fresno	58.17%	34.00%	30.52%	6 years (2016-2022)
Gardena	46.50%	29.17%	99.70%	6 years (2016-2022)
Las Vegas	59.50%	44.50%	00.21%	2 years (2020-2022)
Riverside	51.67%	32.00%	67.65%	6 years (2016-2022)
Sacramento	56.25%	40.00%	130.88%	4 years (2018-2022)
Stone Mountain*	64.00%	44.00%	N/A	1 year (2021-2022)
Tacoma*	48.00%	36.00%	N/A	1 year (2021-2022)

\*Omitted due to only one year of available data

<sup>5</sup> As seen through IEC’s June 12, 2023 notification to ACCSC regarding its presentation to CIE and the Department’s response to that presentation.

On average, four of six campuses with more than one year of data categorize over half of admitted ATB/ECPP students as withdrawn or terminated (*Id.*, pgs. 49-55). The highest comparable average of non-ATB/ECPP students across all campuses remains below 50%. The Commission found this data to raise serious questions about the actual effectiveness of IEC's ECPP/ATB admissions requirements. Furthermore, the data also show total enrollment increases for all campuses, with some increases being substantial, leading the Commission to question the school's support for ECPP/ATB students in light of those enrollment increases and the noted disparity in student graduation rates. Accrediting standards require that a school is attentive to its students' educational and other needs as a means to support retention, maintains written policies and procedures addressing student services, and makes students aware of such services (*Section VI (A)(1), Substantive Standards, Standards of Accreditation*). Also, the Commission questioned whether IEC schools had previously conducted this research, whether IEC made any changes to admissions criteria and if not, why the schools continued to enroll ATB students using requirements that may not be useful assessment tools.

IEC provided documentation of career coaching and student advisement specifically for ECPP/ATB students which cover both student strengths and barriers to student success as well as elements of career preparation and noted that each campus has an ECPP facilitator who is responsible for assisting ECPP/ATB students. While the Commission recognizes IEC's service to ATB/ECPP populations and the noted student advisement and career support specifically for ECPP/ATB students, the Commission is interested in reviewing the total system of support offered to ATB/ECPP students during the program to aid in student success given the noted rates of ECPP/ATB graduation. IEC argued against the Department's allegation that withdrawn ECPP/ATB students did not benefit from the training provided and incurred financial responsibility by saying that this argument discounted the "thousands of students who graduated and benefitted from the education" and discounted the non-academic reasons, comparable to non-ATB students, that lead to student withdrawal (June 30, 2023 IEC Response, pg. 45). Given that the rate of ECPP/ATB student withdrawals and terminations, on average, is above 50%, there are potentially thousands of students who did not meaningfully benefit from the training. While this could be for a variety of reasons, with those reasons being comparable to non-ECPP/ATB student withdrawals, the Commission viewed the disparity in persistence and achievement as a foundation for additional scrutiny in the areas of the IEC schools' admissions and student services.

**Information Received Subsequent to the August 2023 meeting:**

Following the August 2023 meeting, the Commission received the following from IEC:

- IEC's August 8, 2023 Notification regarding the Department's July 31, 2023 notice;
- IEC's August 14, 2023 Notification regarding IEC's August 9, 2023 meeting with the Department regarding a potential resolution of matters before Federal Student Aid; and
- IEC's September 5, 2023 Notification regarding IEC's September 5, 2023 response to the Department's July 31, 2023 notice.

IEC's August 8, 2023 notification to ACCSC details the Department's July 31, 2023 notice to IEC of ongoing investigation regarding United Education Institute and UEI College's compliance with Title IV of the Higher Education Act of 1965, as amended, 20 U.S.C. §§ 1070 et seq. The Department's notice specifically names UEI College, located in Fresno, California and UEI College, located in Gardena, California which are accredited by ACCSC. The Department's notice alleges violations of regulations regarding ATB testing similar to the allegations from the Department's April 11, 2023 letter, falsification of attendance records leading to improper retention of federal student aid, and misrepresentation to prospective students. The Department's letter contains detailed quotes from interviews with students and

employees of IEC, UEI, and [REDACTED] and documentation of text messages between [REDACTED] and UEI employees.

The Department alleges, with quotes and other documentation:

- That proctors and UEI staff helped students to pass the ATB exam during and after the exam;
- That Senior IEC and UEI leadership tracked pass rates and chose specific proctors;
- That proctors reported pressure from UEI officials to pass students;
- That Senior IEC and UEI leaders influenced test administration and proctor training;
- That campus leaders knew of and did not react to compromising communications between proctors and IEC employees;
- That IEC and UEI knew of potential issues with ATB testing;
- That more than half of UEI's ATB students do not complete the program;
- That former UEI employees and students reported falsification of attendance records;
- That UEI made substantial misrepresentations to students regarding employability after graduation and the nature of financial charges; and
- That UEI's leadership exerted pressure to maximize student enrollment without regard for whether enrolled students could benefit from the program.

IEC stated that it is preparing a response to the Department similar to the system's previous May 24, 2023 request for reconsideration and had secured an extension to September 5, 2023.

The allegations contained within the Department's July 31, 2023 letter maintain the Commission's previously expressed concern regarding the standards referenced on pages five through seven of this letter. In addition, the inclusion of attendance and advertising related allegations raised additional questions regarding compliance with the Commission's standards. Accrediting standards state that the school enforces a policy of acceptable student attendance (*Section VII (A)(3)(b), Substantive Standards, Standards of Accreditation*).

The Department referenced several accounts of UEI employees overstating or falsifying attendance which would appear to show that UEI does not enforce its attendance policies (August 8, 2023 IEC Notification, pgs. 17-18). The Department also referenced alleged misrepresentations made to students regarding promises of employment and the nature of their federal financial aid loans (*Id.*, pg. 19). Accrediting standards state that all advertising and promotional materials are truthful and accurate and clearly indicate that education, and not employment, is being offered. No overt or implied claim or guarantee of individual employment is made at any time (*Section IV (B)(1-2), Substantive Standards, Standards of Accreditation*). Accrediting standards also state that tuition costs and charges and all costs incidental to training are fully, clearly, and accurately disclosed to the prospective student before enrollment (*Section I (D)(1)(a)(i), Substantive Standards, Standards of Accreditation*). Given these allegations, the Commission intends to continue to review the school's compliance in these areas.

IEC additionally notified ACCSC of an August 9, 2023 meeting with senior Department officials at the Federal Student Aid ("FSA") office. IEC stated that the group submitted a draft proposal<sup>6</sup> to the Department following guidance given by the Department on August 9, 2023. The draft proposal includes third-party

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<sup>6</sup> IEC proposed an August 24, 2023 date for the FSA to redline the draft proposal.



multi-department monitoring by a group chosen by the Department. IEC indicated that it expects the proposal to result in the resolution of all matters before the FSA including the most recent July 31, 2023 notice. There is no evidence, however, that such a resolution has been reached.

IEC's September 5, 2023 notification to ACCSC contains IEC's September 5, 2023 response to the Department's July 31, 2023 letter. IEC's response to the Department asserts that "[t]here is no merit to allegation of widespread violations of ATB by IEC or UEI" (September 5, 2023 IEC Notification, pg. 3). Similarly, IEC asserts that the system did not falsify attendance records, misrepresent employability or financial aid to potential students, or pressure potential students to enroll. The Commission will continue to review the Department's investigation and will take into account any Department actions in the course of this review.

Based on the foregoing, the Commission directs IEC to submit the following:

- a. Copies of ethical attestations, codes of conduct, character reference checks, or other similar documentation for the board, management, and administrative staff;
- b. Any copies of attestations or codes of conduct for test proctors;
- c. Justification as to the effectiveness of IEC's admissions criteria for ECPP/ATB students;
- d. A detailed description of the student services available to IEC's ECPP/ATB student population, to include any specific services for ECPP/ATB students;
- e. A detailed analysis of the ECPP/ATB student population's student achievement in relation to non ECPP/ATB students;
- f. An update as to the California Attorney General's investigative subpoena to include any correspondence between IEC and the California Attorney General;
- g. An update as to IEC's proposal to the Department to include any correspondence between IEC and the Department as well as copies of the proposal; and
- h. Any additional information that IEC would like to submit in support of its compliance with the accrediting standards referenced above.

**Warning Restrictions:**

Pursuant to *Section VII (K)(8), Rules of Process and Procedure, Standards of Accreditation*, the Commission will not consider substantive changes, a change of location/relocation, or additions (i.e., separate facilities, new programs) to a school or its separate facilities while the school is under a Warning.

**Notification to Students:**

The Commission requires the school to inform current and prospective students in writing that the school has been continued on Warning and to provide a summary of the reasons for the Warning Order (*Section VII (K)(7) Rules of Process and Procedure, Standards of Accreditation*).

**Response Requirements:**

By applying for accreditation, a school accepts the obligation to demonstrate continuous compliance with the *Standards of Accreditation*. While the Commission employs its own methods to determine a school's compliance with accrediting standards, the burden rests with the school to establish that it is meeting the standards. The Commission's deliberations and decisions are made on the basis of the written record and

thus a school must supply the Commission with complete documentation of the school's compliance with accrediting standards.

IEC must provide a response to the items expressed above that provides the information requested along with any additional information that the school believes supports a demonstration of compliance with accrediting standards.<sup>7</sup> If the school's response contains documentation that includes personal or confidential student or staff information that is not required for the Commission's review (e.g., social security numbers, dates of birth, etc.), please remove or redact that information.

IEC must upload the school's electronic response directly to ACCSC's College 360 Database. The ACCSC College 360 database can be accessed by [clicking here](#). Please note that the password utilized by the institution to access the Annual Report Portal is the same to access the School Submission section of the College 360 database. The Instructions for Electronic Submission can be found [here](#). A detailed overview on how to upload a school submission can be found [here](#).

Keep in mind, the school's response must be prepared in accordance with ACCSC's Instructions for Electronic Submission (e.g., prepared as one Portable Document Format ("PDF") file that has been prepared using Adobe Acrobat software (version 8.0 or higher) and which has a .pdf extension as part of the file name). The school will receive an e-mail confirmation that the file has been received within 24 hours of the submission.

The school's response must also include a signed certification attesting to the accuracy of the information and be received in the Commission's office **on or before December 14, 2023**. If a response, the required fee,<sup>8</sup> and the certificate of attesting to the accuracy of the information is not received in the Commission's office **on or before December 14, 2023**, the Commission will consider further appropriate action.

For assistance with the password or for any other questions regarding the electronic submission requirements, please contact [REDACTED]. Please note that any password requests to access College 360 must be made by the school director, or designated member of the school's management team, via e-mail.

For further assistance or additional information, please contact [REDACTED] or [REDACTED].

Sincerely,

[REDACTED]

Michale S. McComis, Ed.D.  
Executive Director

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<sup>7</sup> ACCSC has issued two modules of the **Blueprints for Success Series** – [Organizing an Effective Electronic Submission](#) and [Preparing a Comprehensive Response for Commission Consideration](#) – which provide a framework for submitting a well-documented, organized, electronic response for Commission consideration. ACCSC encourages the school to review these modules when formulating its response to this letter. More information is available in the [Resources section](#) at [www.accsc.org](http://www.accsc.org).

<sup>8</sup> ACCSC assesses a \$500 processing fee to a school placed on Warning.