December 14, 2021

VIA EMAIL AND REGULAR MAIL

Mr. Jorge Moreno
Dean
American International College of Arts and Sciences-Antigua
University Park
Coolidge
St. John’s, Antigua, West Indies
Antigua and Barbuda

Subject: Renewal of Accreditation and Distance Education Review – Compliance Warning

At its November 2021 meeting, the Council considered your institution’s application for renewal of accreditation, the evaluation team visit report, and the institution’s responses to that report. The visit yielded 15 findings, of which the institution has resolved 10 to the Council’s satisfaction. As a result of its review, the Council requires additional information in the following areas of the Accreditation Criteria in response to its review of the renewal of accreditation evaluation report:

1. *(Section 3-1-100 and Appendix H, A2).* *The mission statement is not aligned with the academic level of the program, modes of delivery used, and the enrollment profile of the institution; supporting objectives of the mission are incomplete.* In response to the finding, the institution submitted a revised mission statement that was more aligned with the academic level of programs offered, modes of delivery used, and the enrollment profile. However, the institution did not submit the Change of Mission application to the Council to record and document the change. As a substantive change, this must be approved by the Council. Additionally, the revised mission statement must be published in all relevant publications and to stakeholders following approval by the Council.

2. *(Section 3-1-110 and Appendix K).* *Distance Education is not addressed in the CEP, and faculty satisfaction with the modality is not being evaluated.* In response to the finding, the institution submitted a revised CEP that notes that the curriculum is currently being delivered through distance education only due to the COVID-19 pandemic. The revised CEP included two new goals and survey tools to measure student and faculty satisfaction with the distance education mode of delivery. However, there was no evidence of implementation of the assessment tools along with the necessary summary and analysis in the CEP.

3. *(Sections 3-1-412(a) and 3-1-432).* *Tuition and fees on some enrollment agreements do not match charges on some student ledgers or that stated in the catalog. Fees charged on student ledgers were not consistent among similarly circumstanced students and did not agree with fees*
on enrollment agreements or in the catalog. In response to the finding, the institution submitted a partial written explanation as to why there were discrepancies with tuition and fees charged to what is published, as well as why some enrollment agreements did not include an expected graduation date or start date. However, the supporting documentation did not evidence why charges were not consistent; did not provide review or clarification of the discrepancies between the catalog, enrollment agreements, and student ledgers for the students identified in the visit report; nor was any information provided as to how the discrepancies were resolved and any preventative action for future occurrences.

4. **(Section 3-1-414).** The enrollment agreement does not include all financial obligations; Some enrollment agreements do not include start dates and graduation dates. The institution submitted a revised enrollment agreement template to be utilized moving forward (Spring 2022 semester), which includes the required elements. However, no revised, signed agreements were provided for the students noted in the visit report.

5. **(Section 3-1-441 (c)).** There is insufficient evidence that an individual is assigned to provide employment assistance and activity of employment assistance for students who do not continue their education is not available. In response to the finding the institution submitted documentation that the student in question was provided employment assistance after graduation. Additionally, the responsibilities for future employment services were assigned to Mr. Ashok Reddy for future graduating cohorts. However, no documentation was provided to evidence the assignment of such responsibilities. The Council notes that the majority of graduates at the institution go on to further their education, however employment assistance must be readily available to any student requesting such services.

Additionally, the Council reviewed the Quality Assurance Monitoring (QAM) report and responses to that report for your institution’s ongoing distance education via hybrid delivery. The visit report identified 11 findings, of which 4 were resolved to the Council’s satisfaction, and 2 of which were combined. The Council requires additional information in the following areas of the Accreditation Criteria in response to its review of the distance education QAM evaluation report:

1. **(Section 3-1-100 and Appendix H, A2).** The mission objectives published in the institution’s 2021 catalog does not identify the role of distance education within its scope and purpose. In response to the finding, the institution submitted a copy of their current catalog with an updated mission, objectives, and vision statement to address the distance education mode of delivery. However, as previously noted, the institution has failed to submit a request for a substantive change to the Council for review and approval as a substantive change prior to publishing.

2. **(Section 3-1-511 and Appendix H, D3).** There is insufficient evidence that all staff assigned to or involved in the administration and support of the distance education activities are clearly identified and possess the skills and experience necessary; and there is no evidence of the assessment of online learning. In response the institution has submitted a signed job description for [redacted] which now includes the responsibility for the oversight and administration of distance education. In addition, the institution has included online delivery via the blackboard platform, post team visit. The institution has indicated [redacted] will be supported by [redacted].
In the administration of technical support and training for the Blackboard platform, however, the institution has not provided documentation to substantiate qualifications to administer support for the Blackboard platform.

Additionally, the institution stated that online teaching is monitored by [redacted]. However, documentation to substantiate online learning assessment was not provided. Absent were surveys, checklists, observation forms, and/or feedback relative to the online delivery.

3. **(Appendix H, B2).** *It is not clear in writing how student’s identity will be protected.* The institution provided a clear statement in its response regarding how a student's identity will be verified, and privacy protected. The statement is stated to be published on their website and in the institutional catalog. However, the statement regarding student identity protection on the website could not be located. Additionally, the catalog provided in the response included the statement, however the version on the website contains no mention of the distance education delivery.

4. **(Appendix H, F2).** *There is no evidence that employment assistance is offered to students.* As noted previously, the institution has stated in its response that oversight of employment assistance will be the responsibility of [redacted]. However, no signed job description detailing employment assistance as one of the duties of [redacted] was provided nor any other evidence of the implementation.

5. **(Section 3-1-110 and Appendix K, Appendix H, A3).** *There is insufficient documentation that the distance education plan is incorporated into the CEP, to include an evaluation of the impact on each of the elements.* In response, the institution submitted CEP meeting minutes to discuss the development of the distance education plan, along with the completed plan. However, the institution is currently developing their CEP for the 2022 plan year, therefore incorporation into the plan and evaluation of the impact of the distance education delivery on the outcomes for 2021 are still missing.

6. **(Section 3-1-111, Appendix K and Appendix H, G4).** *There is insufficient evidence the institution conducts course/program evaluations, student satisfaction, faculty satisfaction, or employer satisfaction within the distance education environment; There is no documentation of evaluation of the effectiveness of its distance learning activities.* In response, the institution submitted sample instruments to demonstrate that it will evaluate program effectiveness and faculty satisfaction within the distance education environment. The institution also provided CEP meeting minutes and sign in sheets for the CEP discussions. However, an updated CEP and evidence of implementation was not available.

**Council Action**

Therefore, the Council acted to place your institution on **compliance warning**, extend the current grant of accreditation through May 31, 2022, and require the following information prior to its May 2022 meeting. The information or reports listed below must be received in the Council office electronically by
March 25, 2022. The following items must be provided in response to the institution’s renewal of accreditation application:

1. Evidence that the institution has revised its institutional mission. The institution must seek the approval from the Council for their proposed revision to their mission statement and disclose the approved mission statement in all relevant publications. Documentation must include, but is not limited to, submission of the “Change of Institutional Mission Statement Application” for Council approval. Following the approval, the institution must document that the revised mission has been published in their catalog, CEP, and website if applicable. Copies of such documents (and website screenshots/links) must be included in the institution’s response along with evidence of the notification to all relevant stakeholders.

2. Evidence that the distance education plan is integrated into the CEP and the elements are evaluated to include the effect of the modality on overall outcomes, to include faculty satisfaction. The institution must submit a new CEP for 2022 that includes a fully developed distance education plan which includes all of the elements noted in Appendix H, A(3). The impact of the mode of delivery must be included in the evaluation of the CEP elements of retention, placement, graduation, student satisfaction, graduate satisfaction, and employer satisfaction (if applicable).

3. Evidence that accurate information is being communicated during the admissions process regarding tuition and fees and that all charges are consistent among similarly circumscribed students enrolling at the same time in the same program. Documentation must include, but is not limited to, an audit of student ledgers for all current students enrolled at the institution along with a narrative explanation of why the students were charged more than the published tuition and insurance cost. At a minimum, this must address the discrepancies for the following students listed in the visit evaluation report:

Supporting documentation must be provided to support the narrative, to include copies of the enrollment agreements, catalog(s) under which students were enrolled, and student ledger cards. Announcements of changes in tuition or fees which state the effective date of the change must also be provided. If students were due a refund for any erroneous charges, the disposition and documentation of said refunds must be included in the response. The institution must also address how they will ensure consistent charges between publications, enrollment agreements, and ledger cards moving forward, to include documentation of any training and/or procedural changes that have been implemented.

4. Evidence that the enrollment agreements include all financial obligations and include all required elements. Documentation must include, but is not limited to, copies of updated enrollment agreements which include all financial obligations under which the student was enrolled, start dates and anticipated date of graduation, along with all other required elements. Revised and signed agreements must be provided for the following students:
Additionally, copies of signed enrollment agreements for all students enrolled for the Spring 2022 semester, along with a complete student roster (including enrollment dates) must be included.

5. Evidence that the institution has designated an individual to advise students on employment opportunities. The institution must provide a signed and dated job description for Mr. Reddy that includes the responsibilities of placement services/advisement on job opportunities for students when requested.

The following items must be provided in response to the institution’s distance education application: (Note: Some response documents items be duplicated from the renewal of accreditation application)

1. Evidence that the institution has revised its institutional mission. As previously stated, the institution must seek the approval from the Council for their proposed revision to their mission statement and disclose the approved mission statement in all relevant publications. Documentation must include, but is not limited to, submission of the “Change of Institutional Mission Statement Application” for Council approval. Following the approval, the institution must document that the revised mission has been published in their catalog, CEP, and website if applicable. Copies of such documents (and website screenshots/links) must be included in the institution’s response along with evidence of the notification to all relevant stakeholders.

2. Evidence that staff assigned to or involved in the administration and support of the distance education activities possess the skills and experience necessary to provide the support for course development and delivery. Documentation must include, but is not limited to, a signed job description identifying the oversight responsibilities, ACICS data sheet, and evidence of qualifications, to include copies of completed certifications or trainings, qualifying transcripts, or documented previous experience.

3. Evidence that the institution makes it clear in writing how the student’s identity will be verified throughout the program and how the student’s privacy will be protected. Documentation must include, but is not limited to, a 2022 draft catalog that includes the statement on student identity protection and verification. The catalog must include the effective date and any addendum must clearly state that it is part of the catalog and must include the name, location, and effective date for the entire document. If the information is disclosed on the website, the active link and web address must be provided.

4. Evidence that the institution has designated an individual to advise students on employment opportunities. The institution must provide a signed and dated job description for that includes the responsibilities of placement services/advisement on job opportunities for students when requested.

5. Evidence that the distance education plan is integrated into the CEP and the CEP evaluates the effectiveness of its distance learning activities and conducts course/program evaluations, including assessment of student learning outcomes; student retention and
placement; and student, graduate, faculty, and employer satisfaction. The institution must submit a new CEP for 2022 that includes a fully developed distance education plan which includes all of the elements noted in Appendix H, A(3). The impact of the mode of delivery must be included in the evaluation of the CEP elements of retention, placement, graduation, student satisfaction, graduate satisfaction, and faculty, and employer satisfaction (if applicable).

The campus must describe the methodologies used to collect data, provide a rationale for using each type of data, and provide a summary and analysis of the data collected and an explanation of how the data have been used to improve the educational processes at the campus. The campus must also describe any changes made to the educational processes that were directly related to the collection and analysis of this data. Further, the campus must identify SLOs, such as course grades, GPA, entrance assessment, portfolios, externships grades, and other measures of skill and competency attainment.

The surveys used to assess graduate and faculty satisfaction must include questions relative to the distance education delivery, must be dated to reflect when the survey was administered, and clearly identify the responder. The campus must use the same survey for all members of the group being surveyed. The analysis of the surveys should include the number of surveys sent out and the number returned. The surveys should be designed to provide feedback to the campus that will allow it to determine if improvements should be made to educational processes, as well as the effectiveness of the distance education delivery in reaching set goals.

An institution’s effort toward continuous improvement is an important component of its accredited status; therefore, a constructive response to this Council action letter is essential to a favorable outcome for both the institution and its students.

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

Please contact Ms. Karly Zeigler at kzeigler@acics.org or (202) 336-6846 if you have any questions.

Sincerely,

Michelle Edwards
President and CEO