



ACCREDITING COUNCIL FOR CONTINUING EDUCATION & TRAINING  
1722 N. Street, N.W., Washington, D.C. 20036  
Telephone : 202-955-1113 Fax: 202-955-1118  
<http://www.accet.org>

April 11, 2014

VIA EMAIL & FEDERAL EXPRESS  
(wsand@wbcs.edu)

Mr. Warren Sander  
Chief Financial Officer  
Lingua Franca Institute  
at Washington Baptist University  
4300 Evergreen Lane  
Annandale, VA 22003

***Re: Appeals Hearing –  
Denial Decision Remanded;  
Defer Initial Accreditation;  
Full On-Site Visit Required  
ACCET ID #1411***

Dear Mr. Sander:

This letter is written to advise you of the outcome of the appeals hearing held on March 28, 2014 regarding the decision of the Accrediting Commission of the Accrediting Council for Continuing Education & Training (ACCET) to deny initial accreditation to Lingua Franca Institute at Washington Baptist University based on eighteen (18) findings of non-compliance cited in the Commission's letter, dated December 13, 2013. Upon consideration of the appeals brief, dated February 11, 2014 and the oral presentation and additional exhibits provided during the appeals hearing on March 27, 2014, the Appeals Panel voted to remand to the Commission the findings cited in the December 13, 2013 denial letter for the Commission's further consideration, review, and final determination.

Although not previously challenged by the institution during the accreditation process, the institution in its written appeals brief and oral presentation argued that ACCET, as an institutional accrediting agency, does not have the authority to evaluate or accredit Lingua Franca Institute at Washington Baptist University, because "*ACCET only has the authority to evaluate and accredit stand-alone intensive English language departments, not a combined school*". Nonetheless, the institution proceeded to present evidence in its appeals brief and oral presentation of corrective actions taken to come into compliance with ACCET standards cited in the Commission's letter, dated December 13, 2013.

Following its deliberation, the Appeals Panel remanded to the Commission the decision of whether the Lingua Franca Institute at Washington Baptist University met the eligibility requirements to apply for institutional accreditation from ACCET, which had never been previously disputed by the institution nor considered by the Commission. If the Commission determined that the institution was eligible for ACCET accreditation, it was to determine if the institution demonstrated

compliance with ACCET standards, policies, and practices based on additional information provided during the appeal process.

On the first point, the Commission determined that Lingua Franca Institute at Washington Baptist University was eligible to apply for ACCET accreditation, consistent with ACCET policy. ACCET Document 1 – The Accreditation Process states:

*ACCET provides institutional accreditation for organizations whose primary function is for educational purposes and for organizations offering continuing education as a clearly identified institutional objective within the operational entity such as in-service corporate training or Intensive English Programs owned and operated by a college or university. . . .Institutions that may be eligible for accreditation include:*

- *Trade and professional associations*
- *Private career schools*
- *Corporate training departments*
- *Intensive English Programs (IEP)*
- *Social service, volunteer, and personal development organizations.*

The Panel found that additional information provided by the institution during the appeals process indicated significant corrective actions taken by the institution, including demonstrated compliance with eight (8) standards previously cited in the Commission's December 13, 2013 letter. Additionally, the Appeals Panel acknowledged that the institution initiated other corrective actions to improve its operation. However, these actions were incomplete and without sufficient validation of their systematic and effective implementation prior to the Commission's December 7, 2013 decision.

Therefore, the Appeals Panel remanded to the Commission the decision conveyed in the letter dated December 13, 2013, with the Panel's recommendation that the Commission consider deferring its decision relative to the initial accreditation of the institution and requiring a full on-site visit to determine whether the institution has taken the actions necessary to come into compliance with all ACCET standards, policies, and practices. The Panel requested the Commission to address the appropriate actions to be taken relative to the institution and its accredited status.

Pursuant to its review of the Appeals Panel decision, the Commission voted to defer further action on the institution's application for initial accreditation pending subsequent review at the Commission's December 2014 meeting, following a comprehensive on-site visit to evaluate the institution's compliance with all ACCET standards, policies, and practices. This deferral of a final decision on the institution's appeal is intended to allow the institution an opportunity to demonstrate full compliance with all accreditation requirements and to provide documented evidence of the systematic and effective implementation of revised policies and procedures in practice, over time.

The comprehensive follow-up visit to the institution must take place prior to the December 2014 Commission meeting. Therefore, it is imperative that the institution submit a copy of ACCET Document 8 – Request for an On Site Visit (found at the ACCET website) requesting a full initial accreditation visit, along with the on-site visit fee of \$6,000 (refer to ACCET Document 10 – Fee Schedule) and a completed Analytical Self-Evaluation Report (ASER) in the Accreditation Management System (AMS) by **July 11, 2014**. The institution's failure to meet any of these requirements in advance of the Commission's review at the December 2014 meeting will result in its immediate self-executed withdrawal from the process and the conclusion of the appeal process with a final decision of denial of initial accreditation.

Please be advised that during the period of deferral, institutions are prohibited from making substantive changes, including new programs or major program revisions, new branch campuses or other new sites, and/or relocation out of the general market area.

The appropriate federal and state education officials will be notified of this action by copy of this letter. In the event you choose not to continue with the process, it remains our hope that the accreditation evaluation process served to strengthen your institution's commitment to and development of administrative and academic policies, procedures, and practices that inspire a high quality of education and training for your students. Should you have any questions or need further assistance regarding this letter, please contact the ACCET office at your earliest opportunity.

Sincerely,



William V. Larkin  
Executive Director

RJW/jhh

cc: Mr. Louis Farrell, Director, DHS/SEVP ([louis.farrell@ice.dhs.gov](mailto:louis.farrell@ice.dhs.gov))  
Ms. Katherine Westerlund, Certification Chief, DHS/SEVP  
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March 28, 2014

**In re: Lingua Franca Institute at Washington Baptist University #1411**

**REMAND DECISION  
Re: Initial Accreditation Denied**

Appeal of the decision of the Accrediting Commission of the Accrediting Council for Continuing Education & Training at its December 2013 meeting, denying initial accreditation to Lingua Franca Institute at Washington Baptist University, 4300 Evergreen Lane, Annandale, VA 22003.

**DECISION OF THE APPEALS PANEL**

Having considered the record before the Accrediting Commission when it made its decision in this case at its December 2013 meeting, as supplemented by the institution's written appeals brief, dated February 11, 2014, the oral presentation made by representatives of the institution (Dr. Peter Chang, President, Mr. Warren Saunder, CEO, Ms. Heather Ettus, Director of English Language Program, Mr. Peter Leyton and Mr. Stephen Chema II, legal counsel) who appeared at the hearing before the Appeals Panel on March 28, 2014, and exhibits entered during the hearing, the members of the Appeals panel unanimously find with regard to the citations outlined in the December 13, 2013 Commission action letter, as follows:

Based upon the argument and information presented during the appeal process, the Appeals Panel remands to the Commission for its further consideration, review, and final determination the decision under appeal relative to the findings cited in the Commission's decision letter dated December 13, 2013, including those cited under:

- 1) Standard I-B Institutional Goals
- 2) Standard I-C Planning
- 3) Standard II-A Governance
- 4) Standard II-B Operational Management
- 5) Standard II-C Personnel Management
- 6) Standard II-D Records

- 7) Standard III-B Financial Procedures
- 8) Standard IV-A Educational Goals and Objectives
- 9) Standard IV-B Program/Instructional Materials
- 10) Standard IV-C Performance Measurements
- 11) Standard IV-D Curriculum Review
- 12) Standard VI-B Supervision of Instruction
- 13) Standard V-A Instructional Methods
- 14) Standard VII-A Recruitment
- 15) Standard VIII-A Student Progress
- 16) Standard VIII-B Attendance
- 17) Standard VIII-C Participant Satisfaction
- 18) Standard VIII-E Completion and Placement

Although not previously challenged by the institution during the accreditation process, the institution in its written appeals brief and oral presentation argued that ACCET, as an institutional accrediting agency, does not have the authority to evaluate or accredit Lingua Franca Institute at Washington Baptist University, because “ACCET *only* has the authority to evaluate and accredit stand-alone intensive English language departments, not a combined school”. In the appeals brief, the institution alleged that: “ACCET breached the integrity of the process by overstepping its authority when it accepted the institution’s initial application.” Nonetheless, the institution proceeded to present evidence in its appeals brief and oral presentation of corrective actions taken by the institution to come into compliance with the ACCET standards cited in the Commission’s letter, dated December 13, 2013.

Therefore, the Appeals Panel is remanding to the Commission the decision as to whether the Lingua Franca Institute at Washington Baptist University met the eligibility requirements to apply for institutional accreditation from ACCET, and if eligible for ACCET accreditation, whether the institution has demonstrated compliance with ACCET standards, policies, and practices. The question of the institution’s eligibility for accreditation is being remanded to the Commission, as this is a matter never previously disputed by the institution nor considered by the Commission.

Based on additional information provided during the hearing process regarding corrective actions taken by the institution, the Appeals Panel concluded that the institution demonstrated compliance with eight standards cited by the Commission in its December 13, 2013 letter, including:

- 1) Standard I-B Institutional Goals
- 2) Standard I-C Planning
- 3) Standard II-B Operational Management
- 4) Standard IV-A Educational Goals and Objectives
- 5) Standard IV-B Program/Instructional Materials
- 6) Standard IV-D Curriculum Review
- 7) Standard VI-B Supervision of Instruction
- 8) Standard VIII-E Completion and Placement

Additionally, the Appeals Panel acknowledged that the institution has initiated other corrective actions to improve its operation; however, these actions were incomplete and without sufficient validation of their systematic and effective implementation prior to the Commission's December 7, 2013 decision

Therefore, if the Commission determines that Lingua Franca Institute at Washington Baptist University is eligible to seek ACCET accreditation, it is the unanimous decision of the Appeals Panel to recommend that the Commission consider deferring its decision relative to the initial accreditation of the institution and require a full on-site visit and/or additional reporting to determine whether the institution has taken the actions necessary to come into compliance with all ACCET standards, policies, and practices. The Panel directs the Commission to address the appropriate action(s) to be taken relative to the institution and its accredited status.

APPEALS PANEL

by Alexis Lasheras

Ms. Alexis Lasheras  
Chairperson

CONCURRING

Ms. Yadexy Sierra  
Ms. Megan Kobzej