



April 23, 2014

VIA FEDERAL EXPRESS & EMAIL  
(thomaswls@yahoo.com)

Mr. Thomas Lee, Director  
Wilshire Language School  
3200 Wilshire Boulevard, #1201  
Los Angeles, CA 90010

***Re: Initial Accreditation Denied  
(Appealable, Not a Final Action)  
ACCET ID #1423***

Dear Mr. Lee:

This letter is to inform you that, at its April 2014 meeting, the Accrediting Commission of the Accrediting Council for Continuing Education & Training (ACCET) voted to deny initial accreditation to Wilshire Language School, located in Los Angeles, California.

The decision was based upon a careful review and evaluation of the record, including the institution's Analytic Self-Evaluation Report (ASER), the on-site visit team report (visit conducted February 3-4, 2014), and the institution's response to that report, dated March 19, 2014. It is noted that five of the sixteen initial weaknesses cited in the team report were adequately addressed in the institution's response and accepted by the Commission. However, the Commission determined that the institution has not adequately demonstrated compliance with respect to ACCET standards, policies, and procedures, relative to the following findings:

1. Standard II-B: Operational Management

The institution failed to demonstrate that management develops, implements, maintains, and communicates written policies and procedures compliant with state employment statutes. As a specific example, the team noted that the vacation policy contained a "use-it-or-lose-it" provision, which is unlawful in the state of California.

The institution's response indicated that numerous policies, including the vacation policy, were revised while the ACCET team was on site. The institution further responded that all policies are currently in the process of being reviewed by attorney Yoon Han Kim (Law Offices of Yoon Han Kim) to ensure compliance with state law. However, the institution provide no documentation of updated policies and procedures for review, nor any indication as to what policies were being examined. While the institution may have revised its policies while the team was on site, it failed to demonstrate systematic and effective implementation

of written policies and procedures that guide the day-to-day operations of the institution in practice over time.

2. Standard II-C: Personnel Management

The institution failed to demonstrate that management develops, implements and maintains written policies and procedures for the systematic and effective recruitment, selection, hiring, and retention of all personnel, and failed to demonstrate that management provides orientation, supervision, evaluation, and training and development of its employees to ensure that qualified and capable personnel, at the appropriate staff levels, are effectively utilized.

The team report indicated that the institution had a 90% turnover rate in the past year, including two Chief Academic Officers, which has forced management to focus on faculty and staff hiring rather than providing quality education, including failure to implement an external test to validate its curriculum despite being made aware of this deficiency during its readiness visit months prior to the team's arrival.

The institution's response indicated that both Chief Academic Officers resigned due to higher paying positions at other institutions. Further, the high level of faculty turnover was the result of instructors' personal reasons (i.e. continuing education, relocation, career advancement, lack of work ethic, and terminations due to noncompliance). The institution further indicated that, while the turnover rate concerns management, it is largely outside of its control. Regardless of the individual reasons for the academic staff leaving, the fact remains that such high turnover of such a vital part of the staff adversely affects the institution's ability to consistently provide a high quality course of instruction. Further, the institution's response that faculty turnover is out of its control suggests that it has accepted this status and has done little to remedy it. Additionally, the institution responded that it had purchased and piloted the Michigan test in early March, 2013. The institution failed, however, to demonstrate that it has policies and procedures in place to increase staff retention, or evidence of an analysis of student results on the Michigan test which can only be evidenced in practice over time.

3. Standard IV-A: Educational Goals and Objectives

The institution failed to demonstrate that its programs and courses have appropriate educational goals and objectives, that the curricular content and learning experiences are preplanned and present a sound, systematic, and sequential educational methodology, or that sufficient and appropriate knowledge and skill elements are included to ensure adequate preparation for the expected performance outcomes in the specific program or course for which the students enroll.

The team report indicated that the performance objectives for the American Culture and Current Global Affairs courses were not supported by the syllabus, lacked specific learning outcomes, and were absent of standardized instructional materials. The team noted that courses are primarily taught using newspaper articles that are supplemented with a textbook titled, *Divine English*, which was first written by the school owner twenty years ago and

applicable only to Korean students. Additionally, the text is not designed to teach current affairs and, therefore fails to meet the learning objectives of this course. The team further noted that these two courses comprise one fourth of the institution's curriculum. Consequently, one fourth of the learning objectives are not clearly defined.

The institution's response indicated that, while the Current Global Affairs course did not have a textbook at the time of the visit, instructors were provided regular office hours to find resources and develop reliable assessment methods. However, given the high faculty turnover, the Commission expressed serious concerns relative to the institution's ability and/or willingness to provide a sound, systematic and sequential curriculum for this course. Further, the institution provided meeting minutes relative to the ongoing development of the Current Global Affairs course, which has resulted in the adoption of the Pearson-Longman textbook *Academic Writing*. The institution further noted that the textbook, *Divine English*, was not required to be used by teachers and is updated periodically by the writer/owner. However, the institution did not address how the textbook is relevant in a multicultural environment. The institution provided a revised course syllabus for the American Culture course which contained updated performance objectives and learning outcomes, along with quizzes, mid-term examinations, and exit examinations for both courses. However, the assessment examples provided were blank. Therefore, the institution failed to demonstrate that it has systematically and effectively implemented appropriate educational goals and objectives, supported by curricular content and learning experiences that are preplanned and present sound, systematic, and sequential educational methodology which can only be demonstrated in practice over time.

#### 4. Standard IV-B: Program/Instructional Materials

The institution failed to evidence that program materials, including syllabi, lesson plans, instructional guides, and texts demonstrate the appropriate scope, sequence, and depth of each program or course in relation to the stated goals and objectives. The team report indicates that the textbook *Future* (which is designed for 72 hours of instruction) does not provide sufficient material for the length of a 288-hour course. The report further indicated that the institution's continuing education courses rely heavily on undefined supplementary material which places a large burden on instructors; amplified by the fact that the institution does not have a resource library nor magazine/newspaper subscriptions. While there is one textbook in use in the American Culture course, there is no defined text or set of materials for the Current Global Affairs course.

The institution's response indicated that the Pearson-Longman website states that the *Future* textbook and workbook combined equal 130 clock hours. *Future* workbooks and accompanying audio CDs are uniformly used in the last class of the day, which was not observed by the team. The institution further noted that the remaining clock hours come from supplementary material from the *Future* website, along with multimedia associated with *Divine English*, study hours during final/midterms week, and extracurricular activities, all of which total 288 clock hours. Additionally, the institution responded that *Divine English* is organized by themes of conversation, almost all of which can be tied to a similar topic or

module of the *Future* textbook. Not included in the response was evidence that the instructional materials, including supplementary textbooks, audio CDs, software, and visual aids, support the educational goals and objectives of the two courses in question. Further, the institution failed to demonstrate that it provides structure and guidance relative to its use of a wide range of supplementary material developed by its instructors, which is further hindered by the high rate of turnover among the faculty. Therefore, the institution has failed to demonstrate that it incorporates sufficient instructional materials for a 288-hour course which can only be demonstrated in practice over time.

#### 5. Standard IV-D: Curriculum Review/Revision

The institution failed to demonstrate systematic and effective procedures to continuously monitor and improve the curriculum. The team report indicated that there were numerous concerns expressed by the faculty members and the Chief Academic Officer; however, the institution failed to take any corrective actions to address these concerns. Further, the team expressed concern that the curriculum weaknesses may have contributed to the institution's high turnover rate.

The institution's response indicated that the *Future* textbook series that it uses is aligned with both the Common Core Standards (CCS) and the Common European Framework of Reference for Languages (CEFR), which allows the teachers to use supplementary material from numerous sources, including the Test of English as a Foreign Language (TOEFL) and English for Specific Purposes (ESP). Further, the *Future* series contains a large amount of online supplementary material and lesson guides. However, the institution failed to provide documentation of a curriculum review or a curriculum action plan that demonstrates input from and responsiveness to faculty and staff in order to improve the institution's educational offering. Therefore, the institution failed to demonstrate systematic and effective implementation of a revised curriculum revision and review process which can only be demonstrated in practice over time.

#### 6. Standard V-D: Facilities

The institution failed to demonstrate that instruction is conducted in a safe, accessible, sanitary, and comfortable environment that meets all applicable local, state and federal requirements. The team report indicated that the institution was unable to provide an updated fire and safety inspection certificate.

The institution's response included a letter from the building owner attesting that the fire and safety certificate was unavailable due to the fact that the building had recently completed repairs previously cited and is awaiting retesting. However, effective implementation and observable results were not provided as evidence that the building is up to code. Therefore, the institution failed to demonstrate that the facility is appropriate for the education, training and student services offered.

7. Standard VI-B: Supervision of Instruction

The institution failed to demonstrate that individuals with relevant education and experience in instructional delivery and management supervise instructional personnel. The team report indicated that the Chief Academic Officer responsible for the supervision of ESL instruction did not have the requisite background or experience in ESL education. Further, the team noted that the Chief Academic Officer's lack of experience impairs his ability to review the effectiveness and accuracy of the placement test and the choice of an external test to validate the curriculum.

The institution indicated in its response that Wilshire Language School abides by the Bureau for Private and Postsecondary Education (BPPE) standard for qualification of at least three years of teaching experience, which the Chief Academic Officer meets. Further, the Chief Academic Officer works closely with the Curriculum Developer who possesses the required qualifications and experience outlined by the BPPE and ACCET. Additionally, the Chief Academic Officer is currently taking online TESOL courses for professional development. However, the institution failed to provide substantive evidence that the Chief Academic Officer meets the qualifications to supervise ESL faculty performance. Therefore, the institution failed to demonstrate systematic and effective implementation of a sound process for supervision of instruction that demonstrates good practice in the evaluation and direction of instructors.

8. Standard VIII-A: Student Progress

The institution failed to demonstrate that it effectively monitors, assesses, and records the progress of participants utilizing a sound assessment system with a set of defined elements that are appropriately related to the performance objectives of the programs or courses and that student progress is documented consistently in accordance with institutionally established performance outcomes which are communicated to all participants. The team report indicated that the majority of students repeat a level at least once. Further, a review of student files failed to provide observable evidence of learning plans for those students required to repeat a level, as defined in the institution's policy. Additionally, the institution failed to demonstrate that student progress included a cumulative measure of student attendance. While the institution provided a revised appeals and satisfactory academic progress policy while the team was on site, the institution was unable to demonstrate implementation of learning plans, cumulative attendance tracking and communication of the revised policies. Additionally, the team noted that the institution was unable to provide evidence of an exit examination.

In its response, the institution provided documentation indicating that 22 of the 90 students repeated a level in 2013 (24%) and 16 of 91 (17%) students have repeated a level to date in 2014. The institution provided evidence of corresponding learning plans, all of which were dated in February 2014 after the team had left; clearly indicating that its Satisfactory Academic Progress (SAP) policy had not been implemented. Further, as evidence that the institution used the Michigan Test as an exit test, it provided four completed answer sheets from March 2014

without any analysis of the results or the impact on curricular assessment. Therefore, the institution failed to provide documentation to demonstrate the systematic and effective implementation of the revised satisfactory academic progress policy or the recently implemented Michigan exit examination which can only be evidenced in practice over time.

#### 9. Standard VIII-B: Attendance

The institution failed to demonstrate that it establishes and implements written policies and procedures for monitoring and documenting attendance and that the attendance policy is effective in ensuring that student participation and preparation are consistent with the expected performance outcomes of the course or programs. The team report indicates that attendance reporting was inconsistent. Further, the team observed low classroom attendance. Fifty percent of students were absent during the first hour. Half of those students present were tardy. The team report further noted that the low rate of attendance combined with the high rate of tardiness was not reflected in any of the institution's attendance reporting prior to the team's visit. Additionally, the team noted that the tardy and attendance policies were worded and applied in an excessively lenient manner. For example, attendance was not taken for non F-1 visa students.

The institution responded that the high rate of tardiness and absenteeism was due to the Asian New Year. The institution further indicated that attendance is taken for all current students regardless of visa status. The institution provided a copy of the attendance policy along with attendance reports and documentation for eight students who were terminated due to attendance violations, all dated after the on-site visit, suggesting that prior to the visit the attendance policy was not being enforced. Therefore, the institution failed to provide observable evidence that it implements and monitors a sound attendance policy which can only be evidenced in practice over time.

#### 10. Standard VIII-C: Participant Satisfaction

The institution failed to demonstrate that written policies and procedures are followed that provide an effective means to regularly assess, document, and validate student satisfaction relative to the quality of education and training offered, as well as student services provided. The team report indicated that the majority of student surveys indicate areas of concern that the institution has failed to address.

In its response, the institution provided documentation of meeting minutes and agendas as evidence of the analysis of student surveys. The institution indicated that student concerns are addressed immediately. The institution did not, however, provide the published policy relative to the review and analysis of student surveys, nor did it provide evidence of any actions taken in response to student concerns. Therefore, the institution failed to provide evidence of systematic and effective implementation of the participant satisfaction review process which can only be demonstrated in practice over time.

#### 11. Standard VIII-E: Completion and Placement

The institution failed to demonstrate that written policies and procedures are followed that provide an effective means to regularly assess, document, and validate the quality of the education and training services provided relative to completion rates. The team noted that the institution's current policies and procedures for tracking completion of students is not compliant with ACCET Document 28 – Completion and Placement. The institution's completion rate for 2013 was reported to be 100%. However, four students received refunds making it impossible for these students to complete. In a review of student refunds, the team noted that 22 students left the institution prior to completing their enrollment period. These students were not included in the institution's completion calculations.

The institution responded that it was aware that it was not calculating the completion rate correctly. The institution further indicated that its policy is identical to that of ACCET and therefore, does not require correction. The institution provided updated completion rates along with supporting documentation which indicated completion rates as follows: 2011 = 99%, 2012 = 98%, 2013 = 98%. However, while the institution stated that its completion policy is ACCET compliant, it failed to provide a copy of its policy. Additionally, the institution failed to provide an explanation of the discrepancy between the team's and the institution's calculation. The team calculated the 2013 completion rate to be 88%, yet the institution's response indicates a 2013 completion rate of 98%. Therefore, the institution failed to demonstrate systematic and effective implementation of a written policy for monitoring and tracking completion rates as required by the standard.

Since denial of initial accreditation is an adverse action by the Accrediting Commission, the institution may appeal the decision. The full procedures and guidelines for appealing the decision are outlined in Document 11 – Policies and Practices of the Accrediting Commission, which is available on our website at [www.accet.org](http://www.accet.org). If the institution wishes to appeal the decision, the Commission must receive written notification no later than fifteen (15) calendar days from receipt of this letter, in addition to a certified or cashier's check in the amount of \$8,500.00, payable to ACCET, for an appeals hearing.

In the case of an appeal, a written statement, plus six (6) additional copies regarding the grounds for the appeal, saved as **PDF documents and copied to individual flash drives**, must be submitted to the ACCET office within sixty (60) calendar days from receipt of this letter. The appeal process allows for the institution to provide clarification of and/or new information regarding the conditions at the institution at the time the Accrediting Commission made its decision to deny or withdraw accreditation. The appeal process does not allow for consideration of changes that have been made by or at the institution or new information created or obtained after the Commission's action to deny or withdraw accreditation, except under such circumstances when the Commission's adverse action included a finding of non-compliance with Standard III-A, Financial Stability, whereupon the Appeals Panel may consider, on a one-time basis only, such financial information provided all of the following conditions are met:

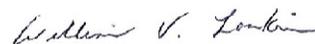
- The only remaining deficiency cited by the Commission in support of a final adverse action decision is the institution's failure to meet ACCET Standard III-A, Financial Stability, with the institution's non-compliance with Standard III-A the sole deficiency warranting a final adverse action.
- The financial information was unavailable to the institution until after the Commission's decision was made and is included in the written statement of the grounds for appeal submitted in accordance with the ACCET appeals process; and
- The financial information provided is significant and bears materially on the specified financial deficiencies identified by the Commission.

The Appeals Panel shall apply such criteria of significance and materiality as established by the Commission. Further, any determination made by the Appeals Panel relative to this new financial information shall not constitute a basis for further appeal.

Initial applicants are advised that, in the instance of an appeal following a denial of accreditation being initialized in accordance with ACCET policy, the institution may not make substantive changes to its operations, such as additional programs or sites, until a notice of final action is forwarded by the Commission.

It remains our hope that the accreditation evaluation process has 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.

Sincerely,



William V. Larkin, Ed.D.  
Executive Director

WVL/mmn

C: Mr. Herman Bounds, Chief, Accreditation Division, USDE, [aslrecordsmanager@ed.gov](mailto:aslrecordsmanager@ed.gov)  
USDE Accredited Schools Directory ([AccreditedSchoolsList@westat.com](mailto:AccreditedSchoolsList@westat.com))  
Mr. Louis Farrell, Director, SEVP, DHS/SEVP ([louis.farrell@ice.dhs.gov](mailto:louis.farrell@ice.dhs.gov))  
Ms. Katherine Westerlund, Certification Chief, SEVP, DHS/SEVP  
([Katherine.H.Westerlund@ice.dhs.gov](mailto:Katherine.H.Westerlund@ice.dhs.gov))  
Joanne Wenzel, Bureau Chief, CA Bureau for Private Postsecondary Education  
([joanne\\_wenzel@dca.ca.gov](mailto:joanne_wenzel@dca.ca.gov))  
Leeza Rifredi, CA Bureau for Private Postsecondary Education  
([leeza.rifredi@dca.ca.gov](mailto:leeza.rifredi@dca.ca.gov))