

August 31, 2018

VIA EMAIL & FEDERAL EXPRESS (john.carreon@ecacolleges.com roger.swartzwelder@ecacolleges.com)

Mr. John Carreon SVP, Regulatory Affairs and Associate General Counsel Virginia College, LLC (dba Virginia College, Golf Academy of America, Ecotech Institute) 488 Palisades Blvd. Birmingham, AL 35209

> Re: Initial Accreditation Denied (Final Action) ACCET ID # 1539

Dear Mr. Carreon,

This letter is written to advise you that the denial of initial accreditation to Virginia College, LLC (dba Virginia College, Golf Academy of America, and Ecotech Institute) by the Accrediting Commission of the Accrediting Council for Continuing Education and Training (ACCET) was amended and affirmed by the ACCET appeals panel subsequent to the July 27, 2018 appeals hearing. The Accrediting Commission's denial of initial accreditation in its letter, dated May 1, 2018, cited findings of non-compliance under ACCET Standards for Accreditation, along with specifying an opportunity to appeal the decision. The institution submitted its request to appeal and subsequently provided its appeals brief and exhibits on July 9, 2018.

Upon review of the institution's written appeals brief (dated July 9, 2018), the oral presentations and exhibits provided by representatives of both the institution and ACCET, and additional written statements provided by Virginia College on July 30, 2018, the appeals panel unanimously voted to affirm, as amended, the Commission's decision to deny initial accreditation to Virginia College, LLC, based on the institution's violation of nineteen standards as set forth in the Commission's decision letter of May 1, 2018. The appeals panel made this decision after its deliberation on July 27, 2018 and again on July 31, 2018 after recess to allow the institution the opportunity to submit additional written statements on July 30, 2018 regarding documents presented by representatives of ACCET during the July 27, 2018 hearing. Having carefully considered the record, the appeals panel found that the institution failed to provide documented evidence to demonstrate compliance with the following nineteen ACCET Standards for Accreditation:

- 1) Standard I-A Mission (Greensboro, Lubbock)
- 2) Standard II-A <u>Governance</u> (Austin, Birmingham, Baton Rouge, GAA Dallas, GAA Myrtle Beach, GAA Phoenix, GAA San Diego, Greenville, Spartanburg)

- 3) Standard II-C <u>Human Resource Management</u> (Biloxi, Chattanooga, Knoxville)
- 4) Standard II-E Communications (Augusta, Biloxi, Greenville)
- 5) Standard III-B <u>Financial Procedures</u> (Chattanooga, Greenville, Spartanburg, Austin, GAA Dallas)
- 6) Standard III-C <u>Financial Assistance/Scholarships</u> (Greensboro, Knoxville, GAA Orlando, GAA San Diego, Spartanburg)
- 7) Standard IV-A <u>Educational Goals and Objectives</u> (Birmingham, Chattanooga, GAA Dallas, GAA Orlando, GAA San Diego, GAA Phoenix, Greensboro, Greenville, Jackson, Knoxville, Lubbock, Macon, Mobile, Pensacola, Tulsa)
- 8) Standard IV-B <u>Program/Instructional Materials</u> (Columbia, Greenville, Jacksonville, Richmond)
- 9) Standard IV-C Externships/Internships (Biloxi, Ft. Pierce, Jackson, Montgomery)
- 10) Standard IV-D <u>Curriculum Review/Revision</u> (Ft. Pierce, GAA San Diego, Jackson, Mobile)
- 11) Standard V-A <u>Instructional Methods</u> (Biloxi, Greenville, Richmond, Spartanburg, Lubbock)
- 12) Standard V-B <u>Learning Resources</u>, <u>Equipment</u>, <u>and Supplies</u> (Austin, Biloxi, Birmingham, Greenville, Jacksonville, Lubbock, Montgomery, Richmond, Spartanburg)
- 13) Standard VI-B <u>Supervision of Instruction</u> (Biloxi, Charleston, Ft. Pierce, Greensboro, Knoxville)
- 14) Standard VI-C <u>Instructor Orientation and Training</u> (Greenville, Spartanburg)
- 15) Standard VIII-B <u>Attendance</u> (Aurora, GAA Myrtle Beach, GAA Phoenix, Birmingham, Augusta, Charleston, Jacksonville, Montgomery)
- 16) Standard VIII-C Student Progress (GAA Myrtle Beach, Columbia, Knoxville)
- 17) Standard IX-B Employer/Sponsor Satisfaction (Birmingham, Columbia, Knoxville)
- 18) Standard IX-C <u>Certification and Licensing</u> (Birmingham, Knoxville, Jacksonville, Richmond)
- 19) Standard IX-D Completion and Job Placement (31 campuses including: Birmingham, Aurora, Augusta, GAA San Diego, Jackson, GAA Orlando, Charleston, GAA Phoenix, Florence, Lubbock, Pensacola, Austin, Columbia, Biloxi, Huntsville, Mobile, Montgomery, Chattanooga, Macon, Knoxville, Columbus, Spartanburg, Ft. Pierce, Greensboro, Greenville, Jacksonville, Tulsa, Baton Rouge, Savannah, Richmond, Shreveport)

Based on additional information provided in the appeals brief, the presentation provided both orally and in writing by Virginia College, and the written statements submitted on July 30, 2018, the Appeals Panel concluded that the institution demonstrated compliance with the following four standards cited by the Commission in its May 1, 2018 letter:

- 1) Standard II-B Institutional Management (Aurora, GAA Dallas, Greenville, Knoxville)
- 2) Standard VII-B Admissions/Enrollment (Columbus, Savannah, Baton Rouge, Shreveport)
- 3) Standard VII-D Student Services (Macon)
- 4) Standard IX-A Student Satisfaction (GAA Phoenix, Knoxville, Greenville)

Therefore, it was the unanimous decision of the members of the Appeals Panel to affirm the Commission's decision conveyed in the May 1, 2018 action letter, as amended by the Appeals

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Panel's decision. Thus, the decision to deny initial accreditation to the institution is a final action. It is noted for the record that at the August 2018 Commission meeting, the Commission acknowledged the appeals panel's decision to deny initial accreditation to Virginia College, LLC after its consideration of the written record, including the appeals brief, documents and exhibits prepared by the institution and ACCET for the appeals hearing, and the additional written statements provided by the institution on July 30, 2018.

As a closing note, the institution has the opportunity to provide a narrative to the Commission's action within 15 days of receipt of this letter. ACCET reserves the right to redact any inappropriate or inflammatory comments prior to posting the response on the website. It remains our hope that the accreditation process has served to focus the institution's resources and commitment towards strengthening its operations.

Sincerely,

William V. Larkin, Ed.D.

William V. Lonkin

Executive Director

WVL/jhh

Enclosure: Decision of the appeals panel

CC:

Mr. Herman Bounds, Chief, Accreditation Division, USDE (aslrecordsmanager@ed.gov)

Ms. Valerie Lefor, Accreditation Division, USDE (valerie.lefor@ed.gov)

Mr. Ron Bennett, Director, School Eligibility Service Group, USDE (ron.bennett@ed.gov)

Mr. Michael Frola, ACD - Multi-Regional (michael.frola@ed.gov)

Michelle Edwards, President, ACICS (medward@acics.org)

Ms. Tivoli Nash, Private School License Compliance Coordinator, AL Department of Postsecondary Education, (tivoli.nash@accs.edu)

Ms. Teri Stanfill, Executive Director, AZ State Board for Private Postsecondary Education, (teri.stanfill@azppse.gov)

Ms. Yvette Johnson, Enforcement Chief, CA Bureau for Private Postsecondary Education, (yvette.johnson@dca.ca.gov)

Ms. Leeza Rifredi, Deputy Bureau Chief, CA Bureau for Private Postsecondary Education, (leeza.rifredi@dca.ca.gov)

Ms. Lorna Candler, Director, Private Occupational Schools, CO Department of Higher Education, (lorna.candler@dhe.state.co.us)

Mr. Samuel L. Ferguson, Executive Director, FL Commission for Independent Education, (susan.hood@fldoe.org)

Ms. Corinna Robinson, Executive Director, GA Nonpublic Postsecondary Education Commission, (corinnar@npec.state.ga.us)

Ms. Carol N. Marabella, Program Manager, LA State Board of Regents, (carol.marabella@la.gov)

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- Ms. Kim Verneuille, Director of Proprietary Schools, MS Community College Board, (kverneuille@mccb.edu)
- Mr. Scott Corl, Executive Director, NC Office of Proprietary Schools, (mcallisterr@nccommunitycolleges.edu)
- Ms. Kelly Wuest, Administrator, NV Commission of Postsecondary Education, (kdwuest@cpe.state.nv.us)
- Ms. Ruth A. Singer, Supervisor of Educational Programs, NYSED Bureau of Proprietary School Supervision, (ruth.singer@nysed.gov)
- Ms. Nora Ann House, Director, OK Board of Private Vocational Schools, (nhouse@obpvs.ok.gov)
- Ms. Lane Goodwin, Program Coordinator, SC Commission on Higher Education, (lgoodwin@che.sc.gov)
- Ms. Stephanie Bellard Chase, Asst. ED Postsecondary School Authorization, TN Higher Education Commission, (stephanie.bellard@tn.gov)
- Ms. Cathe Maeyaert, Special Projects Director, TX Higher Education Coordinating Board (degree granting), (cathie.maeyaert@thecb.state.tx.us)
- Mr. Milan George, Policy Program Specialist, TX Workforce Commission, (career.schools@twc.state.tx.us)
- Ms. Sylvia Rosa Casanova, Director for Private and Out-of-State Postsecondary Educ., VA State Council of Higher Education, (sylviarosacasanova@schev.edu)



July 31, 2018

In re: Virginia College 1539

AMEND AND AFFIRM DECISION Re: Denial of Initial Accreditation

Appeal of the decision of the Accrediting Commission of the Accrediting Council for Continuing Education & Training at its April 2018 meeting, denying initial accreditation to Virginia College, LLC (dba Virginia College, Golf Academy of America (GAA), Ecotech Institute) with a main campus located in Birmingham, Alabama.

DECISION OF THE APPEALS PANEL

Following the appeals hearing on July 27, 2018, having carefully considered the record before the Accrediting Commission when the Commission made its decision in this case at its April 2018 meeting, the institution's written appeals brief (dated July 9, 2018), the oral presentations and exhibits provided by representatives of the institution (Mr. Roger Swartzwelder, Executive Vice President, General Counsel, and Chief Compliance Officer and Mr. John Carreon, Senior Vice President, Regulatory Affairs and Associate General Counsel) and representatives of ACCET (Mr. John Shaheen, Associate Executive Director; Ms. Linsay Oakden, Assistant Executive Director, and Mr. James Doran, Senior Accreditation Coordinator), and additional written statements provided by Virginia College on July 30, 2018, the members of the Appeals Panel unanimously find with regard to the citations outlined in the May 1, 2018 Commission action letter after its deliberation on July 27, 2018 and again on July 31, 2018 after recess to allow the institution the opportunity to submit additional written statements on July 30, 2018 regarding documents presented by representatives of ACCET during the July 27, 2018 hearing, as follows:

The institution is in violation of the following nineteen standards as set forth in the Commission's decision letter of May 1, 2018, including those cited under:

1) Standard I-A Mission (Greensboro, Lubbock)

- 2) Standard II-A <u>Governance</u> (Austin, Birmingham, Baton Rouge, GAA Dallas, GAA Myrtle Beach, GAA Phoenix, GAA San Diego, Greenville, Spartanburg)
- 3) Standard II-C Human Resource Management (Biloxi, Chattanooga, Knoxville)
- 4) Standard II-E Communications (Augusta, Biloxi, Greenville)
- 5) Standard III-B <u>Financial Procedures</u> (Chattanooga, Greenville, Spartanburg, Austin, GAA Dallas)
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- 7) Standard IV-A <u>Educational Goals and Objectives</u> (Birmingham, Chattanooga, GAA Dallas, GAA Orlando, GAA San Diego, GAA Phoenix, Greensboro, Greenville, Jackson, Knoxville, Lubbock, Macon, Mobile, Pensacola, Tulsa)
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- 11) Standard V-A Instructional Methods (Biloxi, Greenville, Richmond, Spartanburg, Lubbock)
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- 13) Standard VI-B Supervision of Instruction (Biloxi, Charleston, Ft. Pierce, Greensboro, Knoxville)
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- 18) Standard IX-C Certification and Licensing (Birmingham, Knoxville, Jacksonville, Richmond)
- 19) Standard IX-D <u>Completion and Job Placement</u> (31 campuses including: Birmingham, Aurora, Augusta, GAA San Diego, Jackson, GAA Orlando, Charleston, GAA Phoenix, Florence, Lubbock, Pensacola, Austin, Columbia, Biloxi, Huntsville, Mobile, Montgomery, Chattanooga, Macon, Knoxville, Columbus, Spartanburg, Ft. Pierce, Greensboro, Greenville, Jacksonville, Tulsa, Baton Rouge, Savannah, Richmond, Shreveport)

Based on additional information provided in the appeals brief and presentation provided both orally and in writing by Virginia College, the Appeals Panel concluded that the institution demonstrated compliance with the following four standards cited by the Commission in its May 1, 2018 letter:

- 1) Standard II-B Institutional Management (Aurora, GAA Dallas, Greenville, Knoxville)
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- 3) Standard VII-D Student Services (Macon)
- 4) Standard IX-A Student Satisfaction (GAA Phoenix, Knoxville, Greenville)

Therefore, it is the unanimous decision of the members of the Appeals Panel to affirm the Commission's decision conveyed in the May 1, 2018 action letter, as amended by this Appeals Panel decision.

APPEALS PANEL

Ms. Patricia Stein Chairperson

CONCURRING

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Ms. Kaelen Johnson Mr. Jason Craft