



April 12, 2010

Glen Besterfield ✓
Kate Wolfe-Quintero
INTO University of South Florida
University of South Florida
4202 East Fowler Avenue, FAO 100
Tampa, FLA 33621

Dear Dr. Besterfield and Dr. Wolfe-Quintero:

Thank you for your March 29, 2010, letter in which you inform CEA that the English Language Institute (ELI) at the University of South Florida is now the Academic English program within a new entity, INTO University of South Florida (INTO USF). You have asked to continue CEA accreditation of the Academic English program.

First, let me say that CEA first became aware of the change that took place at the University of South Florida when we noticed that the link on our web site to the CEA-accredited ELI led to a page for INTO University of South Florida. There was no mention of the ELI on that page, but the CEA logo with "accredited by" was there, implying that INTO University of South Florida is accredited by CEA. We thank Dr. Wolfe-Quintero for addressing this issue immediately and removing the CEA logo from the web site.

Next, there are several issues related to CEA policy that come into play as a result of the organizational change. Your letter states that the University of South Florida entered into an agreement with INTO University Partnerships on January 17, 2010 and that ELI would continue to operate under INTO USF but be renamed the "Academic English program." The renaming of a program that CEA accredits would not in itself be an issue for continued accreditation. However, the fact that there evidently have been other changes, as indicated by the organizational chart, calls into question whether the Academic English program can show that it continues to meet the *CEA Standards for English Language Programs and Institutions* and whether the Academic English program continues to meet eligibility requirements for CEA accreditation under the new joint partnership. In addition, the substantive changes that have taken place were not reported to CEA in a timely manner, according to CEA policy.

Continuing to meet the CEA standards

The CEA standards are divided into 10 standards areas: Mission, Curriculum, Faculty, Facilities/Equipment/Supplies, Administrative and Fiscal Capacity, Student Services, Recruiting, Length and Structure of Program of Study, Student Achievement and Student Complaints. A university controlled program, which the ELI was, is accredited based on meeting standards in all of these standard areas. Thus, the former Director of the ELI was responsible for ensuring compliance with all of the 52 standards in the 10 areas. It appears from the organizational chart submitted with your letter that the Academic Programs Director may continue to have control over the Academic English program in the areas of Faculty, Curriculum, Student Achievement, and perhaps Length and Structure of Program of Study, which may not have changed. However,

responsibility for the other areas has clearly been assumed by other positions within the INTO USF structure, and it is likely that there have been many changes in procedures in those areas.

Thus it appears that the former ELI, (and its Intensive English Program) no longer exists in its entirety as the Academic English program since it does not appear to have control over all of the standards areas upon which accreditation was granted. In fact, the integrity of the program as it existed previously as a whole is not evident. Under the circumstances, accreditation cannot simply be assumed to continue for the Academic English program.

Continuing to meet eligibility requirements

In addition, it is not clear that the Academic English program continues to fall within CEA's scope of accreditation and to meet CEA's eligibility criteria, upon which the US Department of Education bases its recognition of CEA. The English Language Institute/IEP was programmatically accredited as a university program, as defined in the *CEA Policies and Procedures*, which states the type of accreditation granted to the ELI/IEP:

- Within the U.S, *programmatic* accreditation for intensive English programs (IEPs) in universities and colleges, including community colleges, that are accredited by a regional or other institutional accrediting body. Such programs may be part of academic departments (such as ESL, English, linguistics, education), non-instructional units (such as student affairs or international student affairs departments), or continuing education units.

The Academic English program, as an entity organized under and controlled by the INTO USF joint partnership, no longer appears to fall with the category of an intensive English program in a university or college accredited by a regional or other institutional accrediting body. The fact that all employees related to INTO USF academic programs are USF employees is not evidence that the program meets this eligibility requirement. The fact is that the Academic Program is a program of INTO USF not the University of South Florida alone.

Reporting substantive change

With its letter of accreditation, the ELI received a document "Reporting Substantive Change." (copy enclosed) This document states:

All accredited programs and institutions must promptly notify CEA in writing of any proposed substantive change in the program or institution prior to implementation.....Substantive changes include, but are not limited to Any change in mission, goals or objectives

- a) Any change in ownership, legal status or form of control, including a change in the relationship with departments within a host institution.*
- b) any change in location or the addition of a site or auxiliary location at which the program or institution offers at least 50% of an educational program. (For a program in a regionally*
- c) accredited institution, this might mean the program comes under the control of a different department within the institution; for an independent institution, this might mean an actual change in physical location or the addition of a site or auxiliary location at which the institution offers at least 50% of an educational program)*
- d) etc.*

Upon reviewing a report, CEA retains the right to investigate and require additional documentation or an on-site visit before permitting the program or institution to represent that its accreditation covers any such changed

or additional program. Should additional investigation, documentation, or an onsite visit be required, the site must pay an administrative fee plus all direct expenses of such investigations or visits. CEA may take action to withdraw accreditation if these changes materially alter the program so that it no longer falls within the scope of CEA's accreditation or fails to meet the CEA standards.

The initial agreement between USF and INTO University Partnerships took place on January 17, 2010, and agreement was recently reached on the process of transition. As you stated in your letter, "The ELI will continue to operate, under INTO USF, with the ELI non-credit intensive English program being renamed the "Academic English Program" within INTO USF. A review of the INTO USF web site shows no evidence of the existence of the former ELI and the Academic English Program is one of several programs now offered by INTO USF. Again, because of the partnership that now exists, there is a change in the position of the program within the university and there appear to be changes in other areas, most obvious being recruiting, admissions, administrative and fiscal capacity, and student services, including advising, none of which have been reported.

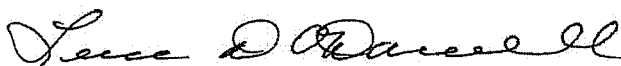
Receipt of a Substantive Change Report, prior to the signing of the partnership agreement, informing CEA of the change in status of the accredited program, would have prompted CEA to forward to you a copy of document, *CEA Policy on Change of Control or Ownership*, which states the policies and procedures to be followed when a change of control or ownership takes place, and the *Application for Continuance of Accreditation Following Change of Control or Ownership*. (See enclosed copies.) Although a Substantive Change Report *per se* was not submitted, your letter of March 29 indicates a substantive change that has resulted in a previously accredited program no longer existing in its entirety.

Thus, as of the date of this letter, CEA must withdraw the accreditation of the English Language Institute, which was granted 9-year continued accreditation for the period April 2009 to April 2018. The withdrawal may be reconsidered with the submission of the *Application for Continuance of Accreditation Following Change of Control or Ownership* and fee (\$4,000) within 30 days of the withdrawal of accreditation.

However, as explained above, it appears that the Academic English program for which you have requested continued accreditation no longer meets CEA eligibility requirements due to the fact that it is now governed by the INTO USF joint partnership rather than through the University of South Florida alone, as it was previously.

Please feel free to contact me if you have questions.

Sincerely,



Teresa D. O'Donnell
Executive Director

Enclosures:

CEA Policy on Change of Control or Ownership

Application for Continuance of Accreditation following Change of Control or Ownership

Reporting Substantive Change



CEA Policy on Change of Control or Ownership

From the CEA Policies and Procedures, Section 3, I.

I. Procedures for change of control or ownership

A change in ownership or control of a CEA accredited English language institution can result in changes in the school that will require assurance that the CEA standards continue to be met after the change takes place. Thus, the following procedures must be followed when a change of ownership or control is about to take place.

- 1) The institution or program must inform CEA by letter 30 days prior to the change of ownership taking place.
- 2) The notification must be followed by a letter and application for continuance of accreditation and payment of a change of ownership fee [See the Fee Schedule.] no later than 20 days prior to the change of ownership. With the application, the site must submit a copy of the new corporate contract, or other legal document, showing names of individuals or legal entities that own or have control over the institution or program, any change in the name of the new entity, contact information for the center director and person responsible for ensuring continued compliance with the standards, state authorization documents or exemption, organizational chart showing the internal structure, shareholders (members, partners), list of key staff with Designated School Officer identified, verification that the DSO or PDSO meet SEVIS requirements for such officers, plans for development of the institution, and a certification statement to be signed acknowledging familiarity with the CEA and the standards, and a commitment to continue the site's compliance with the standards.
- 3) If the application is complete, accreditation is continued until the application can be considered by the Commission for action at its next meeting. If continued accreditation is granted, no substantive changes may take place during the period of continued accreditation without prior approval of the Commission.
- 4) If the completed application is not received prior to the change of ownership or control, accreditation is withdrawn until a complete application is received. A complete application must be received within 30 days of the withdrawal of accreditation. If not, withdrawal of accreditation stands, and the site must begin the process for initial accreditation

- 5) If approval of continued accreditation is granted and a new director was appointed at the time of the change of ownership or control, that person may be required to attend an accreditation workshop along with the CEA contact person for the site.
- 6) Within 90 days after the change of ownership, the new owners or persons with oversight responsibilities must submit certified financial statements which show adequate and available financial reserves, confirming that Administrative and Fiscal Standard 16 continues to be met. The statements will be reviewed by the Commission at its next meeting following submission.
- 7) A special on-site visit will take place within 12 months following the change of control or ownership. In preparation for the visit, the site must submit, at least one month prior to the visit, a narrative report in which it affirms the mission of the institution and submits the following with any changes noted since the change of ownership or control: a list of courses offered along with curriculum documents; a list of faculty with qualifications and teaching assignments; a copy of any faculty, student, or administrative policy handbooks with any changes noted since the change of ownership or control; copies of promotional materials; verification that student advising and other student services have continued at the same level as before the change; and current financial statements showing that AFC 15 and 16 continue to be met. [See the Fee Schedule: special on-site visit]
- 8) Following the visit, the Commission will use the report submitted by the institution, the report following the visit, and the response by the site to determine whether to 1) approve the continued accreditation, 2) defer a decision pending receipt of additional information, or 3) deny continued accreditation.
- 9) The new owners or persons with oversight responsibilities are responsible for any requirements of accreditation and are liable for all accreditation fees due either prior to or following the change of ownership.



**Application for Continuance of Accreditation
Following Change of Control or Ownership**

Please submit this application and all required supporting documentation, along with the fee, to CEA at the address at the end of this form.

Current name of institution/program: _____

Address: _____

Accredited through (year): _____

Date of change of control/ownership: _____

Name of new owner or legal entity: _____

Contact information:

Person submitting application: _____ Phone: _____

Center director under new ownership: _____ Phone: _____

Name of person to whom the center director reports: _____

Person responsible for ensuring continued compliance with CEA standards: _____

Name of DSO/PDSOs, with verification that they meet SEVIS requirements for such officers and evidence of any recent training for the position: _____

(See supporting documentation requirements.)

Supporting documentation and fees

The following must be included with this application:

1. A copy of the new corporate contract (or other legal document) showing names of individuals or legal entities that own or are responsible for oversight of the program or institution.
2. Verification of any change in the name of the program or institution
3. State authorization documents to do business or exemption letter
4. Ownership organizational chart showing the chain of authority
5. Organizational chart for the institution with titles of all key faculty and staff and their years with the program or institution.
6. Documentary evidence that all DSOs or PDSOs meet SEVIS requirements for such officers and evidence of any recent training for the responsibilities of the position.
7. Business plan or plans for development of the institution.
8. Signed and notarized certification statement acknowledging familiarity with the CEA standards and a commitment to continue the site's compliance with the standards. (See below)
9. Change of ownership fee

NOTE: Within 90 days after the change of ownership, the new owner must submit certified financial statements which show adequate and available financial reserves, confirming that Administrative and Fiscal Capacity Standard 16 continues to be met.

Statement of Certification

Submit this statement of certification, signed by a notary public, with the application for continued accreditation.

The new owners are familiar with and committed to upholding the *CEA Standards for English Language Programs and Institution*.

The new owners are aware of policies and procedures required for accreditation and agree to abide by these policies and procedures, including payment of any and all fees and submission of required reports in a timely manner.

The new owners understand that if continued accreditation is granted, no substantive changes may take place during the period of continued accreditation without prior approval of the Commission. (See Substantive Change Report)

The new owners agree to submit certified financial statements showing adequate and available financial reserves, in accordance with Administrative and Fiscal Capacity Standard 16, within 90 days after the change of ownership.

The new owners agree to undergo a special on-site visit 12 months following the change of ownership or control. In preparation, a narrative report will be submitted 1 month prior to that visit.

The new owners agree to pay all fees due either prior to or following the change of ownership or control.

New owner: _____

Signature: _____ Date: _____

Notary:

Date:

Commission on English Language Program Accreditation
801 North Fairfax Street, Suite 402(A), Alexandria VA 22314



Reporting Substantive Change

The Substantive Change Report informs CEA that a significant change is being proposed in an accredited program or institution. CEA policy differentiates between these substantive changes and other minor changes. Since education and accreditation are dynamic, not static, processes, changes are part of a healthy educational process. Ongoing self-evaluation, which is required by the *CEA Standards for English Language Programs and Institutions*, and the resulting changes are expected. However, substantive changes may affect the program or institution's ability to continue to meet the standards. Thus, all accredited programs and institutions must promptly notify CEA in writing of any proposed substantive change in the program or institution prior to implementation.

CEA retains the right to investigate and require additional documentation or an on-site visit before permitting the program or institution to represent that its accreditation covers any such changed or additional programs, and may take action to withdraw the accreditation if these changes materially alter the program so that it no longer falls within the scope of CEA's accreditation or fails to meet the *CEA Standards*.

Types of changes to report

A Substantive Change Report should provide a thorough explanation of any change. Substantive changes include, but are not limited to

- (a) any change in mission, goals or objectives (only if the goals and objectives affect the mission)
- (b) any change in ownership, legal status or form of control
- (c) any change in location or the addition of a site or auxiliary location at which the program or institution offers at least 50% of an educational program. (For a program in a regionally accredited institution, this might mean the program comes under the control of a different department within the institution; for an independent institution, this might mean an actual change in physical location or the addition of a site or auxiliary location at which the institution offers at least 50% of an educational program)
- (d) any change in the type of students served (academic to non-academic, for example)
- (e) the addition of courses that represent a significant departure, in terms of either content or method of delivery, from those offered during the most recent accreditation evaluation*
- (f) the addition of courses or programs at a level below or a level above that included in the program or institution's current accreditation*
- (g) a change in the means for determining student hours and /or a substantial increase or decrease in the number of clock or credit hours awarded for the successful completion of any program of study
- (h) a substantial increase or decrease in the length of the program
- (i) a change in resources, which would affect the program or institution's ability to provide its services

**For (e) and (f), report changes in courses, delivery, or levels unless the changes were as a result of the site visit or recommendations contained in the self-study. These changes should be included in future annual reporting.*

Consultation

When a change in a program or institution is under consideration, and it is unclear whether it is a substantive or minor change, CEA staff should be consulted. In addition, if a program or institution anticipates a substantive change, administrators should consult with staff to assess how the change will affect the program or institution's accredited status.

Process of reporting

1. The program administrator submits a Substantive Change Report.
2. Staff reviews the report to determine whether the change will impact the program or institution's ability to continue to comply with the *CEA Standards*.
3. If appropriate, the report is submitted to the CEA Standards Compliance Committee.
4. The Standards Compliance Committee will make a recommendation for action at the next meeting of the Commission.
5. Additional information may be requested if the change is not well documented.
6. The program director will receive a notice of the results of the Commission review.

Format for the report

In a narrative, describe the change briefly and as clearly as possible. Provide a chronology of circumstances leading to the change. Include a description of the program before the change, a chronology of circumstances leading to the change, and a description of the program after the change. Illustrate the impact of the change on program services. Provide relevant documentation (evidence) to show how the program or institution will continue to comply with the *CEA Standards*.

Mechanics for submission

Submit

- a. one hard copy of your response, including the narrative and all documentation.
- b. one copy of the full response on CD. The preferred format is as a **single** pdf file with links to all documents embedded in the narrative

Remember that a report must be submitted whenever a substantive change is proposed in the program or institution. If you have any questions or wonder whether to submit a report, please contact CEA staff. 703.519.2070.

CEA, 801 North Fairfax Street, Suite 402(A)
Alexandria, VA 22314

Adopted 2000
Commission on English Language Program Accreditation