![CEA logo](Leading by Advancing Standards)

December 13, 2012

Dante Ferraro
English Plus Program
Spanish-American Institute
215 West 43rd Street
Manhattan, NY 10036

Dear Dante:

At its December 2012 meeting, the Commission on English Language Program Accreditation reviewed the application for accreditation of the English Plus Program at the Spanish American Institute.  The Commission has the granted the program accreditation for one year.  The enclosed Certificate of Accreditation signifies the program's achievement.

In reviewing a program or institution, the Commission seeks to determine that the mission and educational objectives are being communicated and met; That performance with respect to student achievement is being realized; that the program or institution is organized so that its mission and educational objectives are supported by adequate human and fiscal resources, that there is evidence of sufficient financial stability, and that the *CEA Standards for English Language Programs and Institutions* are being met.

One-year accreditation may be granted to a program or institution that substantially meets the *CEA Standards* but needs time to address standards-related deficiencies in order to fully comply. The program or institution must agree to meet the conditions of the accreditation within one year.  If the conditions are met within that period, the Commission will grant the program a four-year extension of its accreditation.

With this letter you are receiving the Commission Action Report that includes the reporting requirements, by standard, the reasons for the requirements, and instructions for submitting your response.

**Public Announcement**

Within 30 days following the decision by the Commission, CEA will make the accreditation status public through distribution to various professional groups, as required by the U.S. Department of Education.  The program will be listed on the CEA web site with a link to your web site.  CEA will keep complete records of the review in a secure place and will make public only the type of accreditation granted.  Information provided by the program and related to the accreditation review is considered the property of the program.

**Constituent Council**

A CEA accredited program or institution becomes a member of the CEA Constituent Council. (Constituent Council Governing Rules on enclosed CD.) The annual meeting of the Constituent Council takes place at the NAFSA conference at a time to be announced. As a member of the Council, you have a number of obligations to CEA:

- to maintain the *CEA Standards* (Available on the CEA website and on the enclosed CD)
- to adhere to CEA policies and procedures as stated in the *CEA Policies and Procedures* (Available on the CEA web site)
- to post the *CEA Standards* in a public place, along with the document "Filing a Complaint Against an Accredited Program," (Copies on enclosed CD.) Please make these two documents publicly available to allow others to review the standards that the program meets and to provide an opportunity for input should there be any questions about whether the program continues to meet the standards.
- to submit an annual report each year of accreditation
- to report any proposed substantive changes. (Note that substantive changes, as detailed on the Substantive Change form found on the CD, must be reported in advance.)
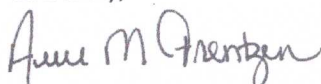
**Annual Reports and Fees**

Annual reports and annual sustaining fees are due at the beginning of each calendar year of accredited status. The report asks for an end of year financial report and confirmation that the standards continue to be met. Annual sustaining fees are based on clock hours calculated for the calendar year prior to the time the annual report is due. CEA will send you calculation and payment forms.

At the time of accreditation, programs also pay an accreditation fee. Accreditation fees for those programs accredited in the spring and summer are based on a calculation of annual sustaining fees and are prorated based on the year's enrollments. For programs accredited in December, the fee is based on a calculation of sustaining fees for that year. A form for payment of the fee is on the enclosed CD. This fee is due within one month of your receipt of this letter.

Accreditation is an intensive process of self-evaluation and review. Congratulations on your achievement.

Please contact Terry O'Donnell at the CEA National Office at 703.519.2070 if you have questions.

Sincerely,

Ann Frentzen, Chair 2012

Enclosed: Commission Action Report
Enclosures on CD:     *CEA Standards,* Filing a Complaint against an Accredited Program, Constituent Council Governing Rules, Sustaining Fee Information and Payment Form, Substantive Change form, Format for the One-Year Accreditation Report

**✓CEA**
Leading by Advancing Standards

**Commission on English Language Program Accreditation**

**Commission Action Report**

**Program or institution:** English Plus Program, Spanish American Institute

**Date of action:** December 2012

**Action taken:** Granted one-year re- accreditation with thirteen (13) reporting requirements

**Date of next review:** December 2013

The Commission has found the program or institution not to be in full compliance with the individual *CEA Standards* noted below. Non-compliance means that the program or institution does not have all of the essentials in place to meet the specified standard. The program or institution must respond to the reporting requirement listed below at least two months prior to the date of next review (See above.).

**Reporting requirements by standard:**

**Three Standards: Curriculum 3, LSPS 1 & LSPS 2**
*Curriculum Standard 3: The instructional materials and methodologies are appropriate and contribute to the mastery of course objectives.*

*Length and Structure of Program of Study Standard 1: The calendar states the number of terms per year, the number of weeks per term and the number of hours of instruction per week. The calendar is consistent with and supportive of the program or language institution's stated mission and goals*

*Length and Structure of Program of Study Standard 2: The program or language institution's curricular design clearly indicates the levels of instruction and specifies how students progress through a full program of study.*

In each of its four 12-week terms per year, SAI permits new or progressing students to enter a level on the second Monday of every month. Students who enter a level after the first week of the term join the on-going class in its sequential march through the units in the text. If they can't pass the comprehensive Exit test given at the end of the end of the 12-week term or at other times at the recommendation of the teacher, they continue in the course and start at the beginning of the book—as is the case with textbook-based, rolling- intake schools. The issues identified by the team are the following interrelated ones: (1) Curriculum 3 and LSPS 1 - "examination of the texts revealed that the units become progressively more difficult as students move through the book, making it difficult for students to study later units in conjunction with or before an earlier unit." (2) LSPS 2 - In order to demonstrate that the current system works, "the average pass/fail patterns and rates of promotion for each level have not been provided."

SAI's response to the review team report for these three partially met standards re-explains its rationale for having rolling intake(which is not the issue) and re-presents one year's worth (2012) of data for students' pass- rates on the bi-monthly achievement tests and the multi-year statistics on the

progression of Level 1 students. The response does not address the underlying issue of demonstrating that the current system prepares students to progress through the levels of instruction.

**Reporting requirement 1 (for Curriculum 3, LSPS 1, LSPS 2):**
Present aggregated data from multiple years since implementation of the NorthStar-based curriculum to demonstrate that the instructional materials and methodologies are appropriate and contribute to the mastery of course objectives. Demonstrate that there is a logical consistency among the pass/fail patterns at each level, rates of promotion for each level, and the average time required to complete all levels in the curriculum.

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*Faculty Standard 1: Faculty members have education and training commensurate with their teaching assignments.*

All faculty hold at least a bachelor's degree, and some hold a master's degree; all faculty's degrees have been formally evaluated for US equivalency. These degrees often are not in TESL or a related field. All instructors must have at least a provisional license to teach ESL from the State of New York Department of Education, which requires evidence of 3 semester hours or 30 clock hours of ESOL methods coursework to receive a permit. To move to the next stage of licensure, the person must add 30-clock hours or 3 semester hours in general education methods or 30 additional clock hours in ESOL methods course work and must have one year of teaching experience. To receive full licensure, all of the previous requirements must be met plus an additional year of teaching experience.

The review team notes that it was stated throughout the self study and included in the Objectives in the description of English courses in the catalog that the program prepares students "to obtain admission to academic or vocational training requiring improved English language skills." Classes entitled TOEFL Preparation and "College Success" are in the 9480 and 5956 course lists. As stated in the discussion section of this standard, a master's degree is considered the baseline qualification for faculty who teach college and university preparation courses. It appears that some SAI faculty teaching academic preparation courses do not meet this baseline qualification. Faculty who teach more general English courses at the lower levels appear to have adequate qualifications.

In its response to the review team report, the site mistakenly suggests that because SAI is not a degree-granting institution, it does not have to meet this baseline for teachers of classes used to prepare students for college or university. The site has documented that its mission statement has been changed to say that SAI's mission is to provide English language skills training to individuals seeking "further non-academic studies . . . ." They do not document that the language referencing academic-preparatory training has been removed from other documents.

**Reporting requirement 2**
Document that all sources of information are consistent in stating the type of English language training offered by SAI. If information indicates that some SAI classes prepare students for further academic studies, document that all faculty teaching those courses have education and training commensurate with their teaching assignments, as required by the standard discussion.

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*Faculty Standard 2: Faculty have experience relevant to teaching students at the postsecondary level in their areas of assignment and demonstrate an ongoing commitment to professional development.*

The review team reported that the site's response in the self-study to this standard was to state that experience is not a requirement for teaching in the English Plus Program. The review team could not find evidence that all ESL faculty had prior work experience relevant to ESL teaching. There was no evidence that all instructors have participated in a supervised practicum experience or taught English in a supervised setting prior to hire by SAI or that after their hiring by SAI they are being supervised or mentored as required in the discussion section of this standard.

In the response to the review team report, SAI stated that they recognize the need to provide their teachers with a more formalized mentoring and teaching effectiveness plan. They state that the plan will be posted on their website and disseminated to the faculty via printed memo. This revised Faculty Mentoring and Teaching Effectiveness Plan would provide instructors who lack experience with supervision and mentoring as required by the standard.

**Reporting requirement 3**
Provide evidence of the development, implementation, and assessment of a plan to provide careful monitoring and developmental support for all faculty who do not have experience relevant to teaching ESL students at the postsecondary level in their areas of assignment.

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*Faculty Standard 3: Faculty who teach English demonstrate excellent proficiency in English. In language institutions where languages other than English are taught, faculty demonstrate excellent proficiency in the languages they teach.*

The review team reports that almost all instructors in the English Plus Program are non-native speakers of English. Classroom observations and interviews with faculty revealed that there is a wide range of English proficiency among the instructors. The review team stated that some instructors speak English with near-native proficiency; among other instructors, grammatical errors and strong accents sometimes made it difficult for site reviewers to understand the faculty member. Student satisfaction surveys indicate that some students are not satisfied with the English language proficiency of their instructors.

In the self study, the site stated that applicants for a New York State ESL teaching license must complete courses at an approved institution, and that in order for teachers to successfully complete these courses, they must demonstrate language proficiency based on the criteria outlined by the institution. Also, they stated that both the President and the Dean of Academic Affairs interview all prospective candidates. SAI indicates that, taken together, these two things serve as their informal language proficiency assessment. The review team concluded that this process for establishing faculty proficiency in the English language does not appear to meet the requirements of this standard.

The site's response to the review team report states that Spanish-American Institute's administrative team anticipates initiating minimum standards for teachers in the near future and will evaluate establishing a policy for non-native speaking, incoming faculty to demonstrate proficiency through scores on the TOIEC. Applicants would be provided with tuition assistance if a TOEIC Speaking scores of a 7 or 8 were not achieved.

**Reporting requirement 4**
Provide evidence of the establishment, implementation, and assessment of a system to ensure that faculty who teach English demonstrate excellent proficiency in English as required by this standard.

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*Faculty Standard 5: Faculty members each receive a job description and all the terms and conditions of employment in writing at the time they are hired and any time their duties or employment conditions change.*

*Administrative and Fiscal Capacity Standard 3: Administrators and staff each receive a written job description at the time they are hired and any time their duties or employment conditions change.*

For both Faculty 5 and AFC 3, the review team states that many conditions and expectations of employment are generally written in the Faculty Handbook, but that SAI states in Administrative and Fiscal Capacity Standard 10 that employment contracts between employees and SAI are oral. Some of the terms and conditions of employment such as teaching load, course assignment, compensation, and length of employment are stated as "mutually agreed to" by the employee and an administrator but are not specified in writing at the time of hire or when duties or employment conditions change.

SAI gives an identical response to the review team report for both standards-- that it has already amended its Faculty Handbook on line to include terms and conditions of employment relating to teaching load, course assignments, compensation and length of employment so that this information is available in writing at the time of hire and when employment conditions change. No mention is made of the distinct expectations, terms and conditions, compensation, and length of employment for administrative and other staff.

**Reporting requirement 5**
Provide evidence that all current administrators, staff, and faculty members have received a written job description as specified in the discussion for each of these standards, including a written statement of all the orally mutually agreed upon terms and conditions of employment. Provide evidence of a procedure to ensure that future administrators, staff, and faculty members will receive this at the time they are hired. Provide evidence that all administrators, staff, and faculty receive a comparable written job description and all the terms and conditions of employment any time their duties or employment conditions change.

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*Administrative and Fiscal Capacity Standard 8: The program or language institution documents that it is in compliance with all local, state, and federal laws, as well as with any applicable institutional regulations.*

Although the school demonstrated compliance with other relevant local, state, and federal laws, the review team noted two potentially serious problems. The first potentially serious problem concerns monitoring and taking appropriate action about absenteeism and lack of satisfactory academic progress for all students, which impacts students on F-1 visas. Appropriate policies and procedures to address absenteeism and lack of academic progress are available, but it was not clear to the review team that they were being enforced. During the site visit, attendance in several classes was less than 50%; in others it was 50% to 60%. Attendance reports showed that some students come to class as little as once a week for weeks in a row. An example of the school's absence warning letter was provided, but the letter did not contain the warnings mentioned in the School Catalog (advising of possible loss of certificate/diploma eligibility, loss of financial aid, or loss of student visa status – Student Catalog, page 49). A SEVIS report on actions taken (terminations for various reasons) was provided as evidence that the Institute has terminated students for poor attendance.

The second potentially serious problem arises because the Institute does not determine the visa status of walk-in prospective students before enrolling them in courses. Thus, walk-in students on B-2 tourist visas may be allowed to enroll in more hours than permitted by their visa status.

In response to the review team report, SAI included a revised Absence Letter, but it appears to contain inaccurate information about all the consequences of excessive absences from a student's current institution. Also, in their response, SAI re-asserts that it does not investigate the visa status of members of the public seeking to enroll as private students and who neither have a student visa nor expressed an interest in applying for a student visa. They do not address the issue of over-enrolling a B-2 student, for example.

### Reporting requirement 6
Provide evidence that the school is in compliance with all DHS regulations, including attendance and satisfactory progress requirements for F-1 students and limits of study for B-2 students. Describe the policies and practices in place and provide documentation that demonstrates compliance.

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*Student Services Standard 3: The program or language institution provides pre-arrival and ongoing orientation (1) to support students in their adjustment to the program or language institution (and to the host institution if applicable) and to the surrounding culture and community, and (2) to help them understand immigration regulations and procedures, as well as health and safety issues.*

Student orientation relies heavily on the comprehensive online School Catalog, which is text heavy and often written in language that may be difficult for an ESL student, especially those at lower levels, to understand. The review team confirmed that Faculty Student-Service Associates are available to explain and interpret the Catalog; also, the PDSO and four DSOs are available to answer questions and counsel students on immigration matters, but there is no organized orientation that addresses immigration regulations and procedures. It appears that most F-1 students are already in the US and transfer to SAI. On arrival, students receive a one-on-one orientation to the Institute program and facilities with a Faculty Student Services Associate. There appears to be no further or ongoing orientation program, no orientation to health and safety issues (although they are addressed in the School Catalog), and no orientation to the surrounding culture and community.

In its response, SIA asserts its commitment to ongoing orientation and has created an Ongoing Student Orientation Guide 2012-2013 and a Student Club Monthly Orientation Guide to NYC, available online and in printed format at the Institute. The recently distributed Faculty Memo on On-going Orientation tries to have each faculty member participate in a monthly cycle of orientation for new and continuing students through individual and class activities.

### Reporting requirement 7
Provide evidence that clear, complete pre-arrival initial arrival and on-going orientation to the program and its policies and to the host institution are being provided to all new students. Include possible cross-cultural issues and all area described in the discussion for this standard.

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*Student Services Standard 5: Students have access to health insurance if required and, in all cases, students are informed about the need for adequate health insurance coverage.*

The Spanish American Institute does not require students to carry health insurance. Lower-level students learn about health insurance and health topics as part of unit lessons. The School Catalog contains a one-sentence statement regarding the impact of not having medical care insurance, but review team believe it is not clear that the full impact of the consequences of not having health insurance likely is fully understood by international students from this one sentence.

SAI responded to this standards area by expanding the information in the online and printed School Catalog to assure that students understand the full impact of the consequences of not having health insurance.

**Reporting requirement 8**
Provide evidence that all students at all levels are informed of the need for adequate health insurance coverage.

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*Student Achievement Standard 1: The program or language institution has a placement system that is consistent with its admission requirements and allows valid and reliable placement of students into levels.*

Put into use by SAI in 2012, the CESLA placement test, which does not evaluate speaking or writing, is administered when new students arrive at SAI rather than according to a set schedule; the test appears to be appropriately monitored. After initial placement, students can be moved to another level based on teacher observation during the first week and on diagnostic tests that have been created using NorthStar materials. The program has limited data on the reliability of the CESLA placement test for placing students into their program. On site, reviewers were shown data that indicated that for level-one students, the rate of movement to a new level was minimal, but no other data about placement into other levels was made available to the reviewers to demonstrate that the placement test is effective, reliable, and valid.

SAI's response to the reviewers' findings was to describe their policy for students to test out of the current level. According to SAI's response, 69.3% of students attempting the test are successful. The data supplied by SAI seems to indicate that newly placed students who take the MyNorthStar Lab tests to try to place in a higher level have a high likelihood of moving and, therefore, must have been misplaced by the original placement test.

**Reporting requirement 9**
Provide data to show that the program has a placement system that allows valid and reliable placement of students into levels.

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*Student Achievement Standard 2: The program or language institution documents in writing whether students are ready to progress to the next level or to exit the program of study, using instruments or procedures that appropriately assess the achievement of student learning outcomes for courses taken within the curriculum.*

Two areas of concern were noted by the review team. First, homework and participation in class activities are the only means of weekly measurements of students' achievement. However, the site plans to review, adapt and implement set rubrics for each level for both oral and written assignments

during Fall 2012.  Second, since the use of NorthStar assessment tools for bi-monthly exams and MyNorthStar Lab tests for the exit exam have both been recently implemented, there is little data to verify the effectiveness of the system.  The program is collecting data on the effectiveness of these newly implemented assessment tools but cannot, at this time, present data to demonstrate the validity of the assessment instruments and procedures, as required by the standard.

**Reporting requirement 10**
Provide data to demonstrate that the instruments or procedures used to determine if students are ready to progress to the next level or to exit the program of study appropriately assess their achievement of the student learning outcomes for courses taken within the curriculum.

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*Student Achievement Standard 4: The program or language institution informs students of the assessment procedures used to determine placement, progression from level to level, and completion of the program, as well as their individual results.*

The review team reports that information regarding assessment procedures is available on the course syllabi and in the School Catalog.  However, they also report that the section in the School Catalog on Grade Reporting Procedures provides information that may not be comprehensible to ESL students and that is different from what is stated in the self-study.  Furthermore, in the self-study, the site indicated that the grade report gives students information on assessment practices.  In reality, the grade report gives only a student's grades in each class and a grading scale.  Finally, there is no formal process for grade appeals; the only written appeals process in the School Catalog is for being placed on probation.

In its response to the team report, SAI included links to the updated its online School Catalog that includes a formal process for grade appeals.  However, it did not address the other issues.

**Reporting requirement 11**
Provide evidence that the program consistently informs students of its placement, progression, and program-completion assessment procedures, that it provides students with their individual results, and that students are informed of and have access to the program's grade-appeal procedure.

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*Program Development, Planning, and Review 1: The program or language institution has a plan, in writing, for development of the program or language institution, including planning, implementation, and evaluation.*

*Program Development, Planning, and Review 2: The program or language institution regularly reviews and revises its program components and has a plan, in writing, to guide the review of curricular elements, student assessment practices, and student services policies and activities. The plan is systematically implemented.*

To fulfill the requirements of both PDPR 1 & 2, SAI presented its 5-year Institutional Effectiveness Plan that is required by ACICS.   However, the items covered and the goals of that plan are not the same as the specifically detailed requirements of CEA's PDPR 1 & 2.  Also, as the review team notes, the discussion for both standards states that "the written plan must include the tasks, process, responsible parties, and time lines, as well as a list of the documentation that provides evidence that the plan has been implemented."

In its response to the review team report, SAI re-worked the ACIS Institutional Effectiveness Plan to divide its information into tasks, processes, responsible parties, and time lines. It did not include documentation that the plans have been implemented as required by both standards. Also, the reworked ACIS review plan does not cover all the areas specified by the two standards, such as mission, external and internal factors affecting many aspects of the program, all the areas of curriculum review, assessment review, or student services review.

**Reporting requirement 12**
Provide evidence of a plan, in writing, for development of the program that covers planning, implementation, and evaluation and that is comprised of the tasks, processes, responsible parties, time lines, and document as specified by the standard. Include all the areas specified in the Program Development, Planning, and Review Standard 1. Provide evidence of implementation of the plan.

**Reporting requirement 13**
Provide evidence of a plan, in writing, for review of curricular elements, student assessment practices, and student services policies and activities that is comprised of the tasks, processes, responsible parties, time lines, and document as specified by the standard. Include all the areas specified in the Program Development, Planning, and Review Standard 2. Provide evidence of implementation of the plan.

**Format for the one-year report**
Submit your report according to the Format for the One-year Report, a copy of which is on the enclosed CD.

Please review the reporting requirements listed above and submit a notice to Terry O'Donnell at the CEA office within 30 days, showing your intent to comply by the date of next review.

**Future review by the Commission**
Your response to the reporting requirements listed in this Commission Action Report will be reviewed by the Commission, which may grant 9-year continued accreditation. If the site remains out of full compliance with any standard, the Commission may withdraw accreditation unless it is judged that the program is making a good-faith effort to come into full compliance. In such case, accreditation may be continued for 4-years, with future reporting required as determined by the Commission.