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July 22, 2022

Dr. James Etter
Chief Executive Office
Citizens' High School
1590 Island Lane, Suite 44
Fleming Island, FL 32002

Dear Dr. Etter:

The Distance Education Accrediting Commission (the Commission) met on June 22, 2022 and considered the application for renewal of accreditation submitted by Citizens' High School (CHS).

Upon review of the April 7, 2022 Chair's Report pertaining to the February 10, 2022 on-site evaluation and the May 18, 2022 institutional response, the Commission voted to direct the institution to show cause why its accreditation should not be withdrawn. The Commission expressed grave concern that CHS is not complying with a significant number of DEAC accreditation standards. **CHS's responses must be submitted in accordance with the deadlines set forth in this letter. CHS is not permitted to pursue substantive changes as long as the show cause directive remains in place.**

The show cause directive will be in effect until January 2023 unless the Commission determines that earlier action, including a modification to the scope of the show cause or withdrawal of the institution's accreditation, is warranted as it reviews CHS's responses to and compliance with DEAC Standards and the requirements set forth in this letter.

Among other concerns described in this letter, the Commission has found CHS to be out of compliance with Standard V.C. *Performance Disclosures*, Standard VII. A. *Advertising and Promotion*, and Standard VII.B. *Institution and Course Accredited-Status* due to misleading information presented on the CHS website. The Commission requires immediate action by CHS to correct this misleading information in accordance with Section XVI.C. *Processes and Procedures*, *DEAC Accreditation Handbook*.¹ **A response from CHS demonstrating that it**

¹ Section XVI.C. Correction of Misleading or Inaccurate Information, Processes and Procedures, *DEAC Accreditation Handbook*: DEAC requires that an accredited institution correct any misleading or inaccurate information it provides to third parties relating to (a) the institution's accreditation status, DEAC, or the DEAC accreditation process or (b) other information that an institution may be required to disclose under DEAC policies, DEAC accreditation standards, or federal/state regulations. DEAC will notify the institution of any misleading or inaccurate information that comes to DEAC's attention and request that the institution immediately make the correction, post a notice of the correction, and document to DEAC that the correction has been made. Failure to do so within 10 days may result in an order of a special visit or other disciplinary review action, including but not limited to, the issuance of a show cause directive.

has made all necessary corrections and that its website disclosures are compliant with Standard V.C., Standard VII.A., and Standard VII.B. is due no later than August 1, 2022 and will be reviewed by the Commission at its August 2022 meeting. CHS must provide all required information in accordance with the instructions detailed in items 1-3 of this letter by August 1, 2022. CHS must also comply with all other requirements, instructions, and reporting timelines described herein.

1. Standard V.C. Performance Disclosures

The institution routinely discloses on its website reliable, current, and accurate information on its performance, including student achievement, as determined by the institution.

The Chair's Report required CHS to provide evidence that it routinely discloses student achievement data, including parameters of the metrics used as a frame of reference for the data provided in the disclosure. The Chair's Report reminded CHS that graduation rate data must be accompanied by information on the time frame expected for program completion.

CHS presented updated disclosure information that it posted on its website. However, upon review of this information in relation to other information in the accreditation record and content presented on the CHS website, the Commission noted concerning issues as follows:

- The performance disclosure on the website lists two credentials, Academic Studies diploma and General Studies diploma, and a list of programs that are not on record as having been approved by DEAC (affiliate program, media relations program, Nepal pilot program, Ath-ELITE Academy, Ukrainian Refugee Online Academy, Nelson Mandela Academy, Flex Diploma for College Bound Students²).
- The CHS website advertises four credentials: College Diploma Program, Diploma for College, Diploma for Career, and CHS Express Diploma. However, DEAC's records indicate that CHS is approved only for the following programs: Career High School Diploma Program (18-credit pathway), High School Diploma for Job Corps (22 credit pathway), and College Diploma program (24 credit pathway). Moreover, the 2021 Annual Report submitted by CHS lists only one credential: High School Diploma.
- Of particular concern to the Commission is the listing of the CHS Express Diploma³ and Express Coursework which advertises that courses can be completed in as little as three weeks. This diploma is not listed in the DEAC record of approved programs for CHS.

CHS must provide (1) an explanation for these inconsistencies and why it identifies diploma programs on its website that are not approved by DEAC and (2) documentation to

² <https://citizenshighschool.com/?s=program+list>

³ <https://citizenshighschool.com/express/> and <https://citizenshighschool.com/chs-express/>

demonstrate that information provided to the public on CHS's approved high school programs is consistent with the program approvals on record with DEAC.

The Commission is requiring immediate and effective action on the part of CHS to correct inconsistent, inaccurate, and misleading statements on its website. The Commission is especially concerned for potential students for whom English is not their first language. CHS must demonstrate an ethical responsibility to ensure that its website content and promotional literature are truthful, accurate, clear, and readily accessible to all students and their families.

2. Standard VII. A. Advertising and Promotion

The institution conforms to ethical practices in all advertising and promotion to prospective students. All advertisements, website content, and promotional literature are truthful, accurate, clear, and readily accessible to the public; proactively states that programs are offered via distance education; and appropriately discloses occupational opportunities as applicable. Catalogs, enrollment agreements, manuals, and websites list the institution's full name and physical address. At a minimum, all print advertisements and promotional literature include the institution's city, state, and website home page URL where, in compliance with DEAC's website disclosures checklist, the institution's physical address is provided. All web-based advertisements provide a link to the institution's website home page URL. All institutional social media account profiles provide a link to the institution's website home page URL. The institution complies with the DEAC's catalog disclosures checklist and DEAC's website disclosures checklist.

1. All advertisements and promotional materials accurately reflect the programs and services offered by the institution. The word "guarantee" is never used in advertisements. Under limited and exceptional circumstances, institutions may use the word "free" when it is appropriate to the mission and purpose of the institution.

2. The institution's website testimonials and endorsements are truthful and less than four years old. The institution maintains signed student consent forms for each published testimonial. The institution's website discloses all program requirements, course descriptions, tuition and related costs, program schedules, method of delivery, and its catalog prior to the collection of any personal student contact information. The institution does not use other institutions as triggers for its own sponsored links on internet search engines.

3. The institution discloses in its catalog, website, and enrollment agreements that the acceptance of earned transfer credits is determined by the receiving institution.

4. The institution adheres to applicable catalog, website, and enrollment agreement disclosures checklists, based on educational offerings. The institution publishes student consumer information as required by federal and state statute and regulations.

5. Any incentives offered to prospective and current students to enroll do not exceed a nominal value of \$100 annually.

6. The institution permanently archives its catalogs.

The Chair's Report directed CHS to take specific actions to demonstrate that it is meeting Standard VII. Specifically, it required that CHS

- Provide evidence that all website content advertising is truthful, accurate, transparent to the public and follows the Standard VII requirements.
- Provide evidence that it only hires state certified teachers or demonstrate that it has removed the current statement on its website claiming that "all teachers are state certified".
- Provide documentation to support its claims that its graduates have attended all the universities and colleges its lists on its website.
- Re-evaluate and justify the use of "guarantee" regarding transfer credit and the use of "free" when referring to the high school planning material.
- Establish a consistent process and procedure to obtain an appropriate authorization (e.g., adult consent, when applicable) for the use of student testimonials.

Upon review of the response to the Chair's Report and the CHS website to verify corrective action, the Commission found extensive use of exaggerated, misleading, and inappropriate content in following statements made by CHS on its website:⁴

1. Information describing an express diploma in the FAQ states "How fast can I get my diploma?" "Answer: A LOT faster than you'd expect!"
2. For someone who is "a few credits short," CHS states "you can enroll in the college of your choice..."
3. Students can complete courses in "just a few weeks" or "an average of just three weeks."
4. "College Diploma Program"
5. "If I attended High school in another country, can I enroll in the CHE Spanol Program?" "Yes. We would evaluate your transcript, and transfer as many credits as possible."
6. "How long does it take to complete an online course?" "It's up to you. Courses can be completed in as little as 28 days (one month). The cost is \$69 per month. The quicker you complete the course, the less costly."
7. "24 Credit-Duke University" could potentially mislead a student to believe that this leads to admission to Duke University.
8. "Make sure you provide the counselor the program link, along with the guaranteed transfer credit request form."
9. "Are Citizens High School diplomas accepted at universities?" the response is, "YES! Colleges and universities throughout the United States..."
10. "Dual Country Diploma v CHS," page 1 indicates CHS is "regionally and nationally accredited."

⁴ <https://citizenshighschool.com/flex-diploma/college/>

11. "Can I use my diploma to attend college or gain employment?" "Yes. While CHS does not guarantee employment, our diploma is nationally accredited and our diploma is accepted at most public and private universities..."⁵

CHS must demonstrate that it has removed misleading information and demonstrate that its website content and promotional literature are truthful, accurate, clear, and readily accessible to all students and their families.

3. Standard VII.B. Institution and Course Accredited-Status

The institution accurately reflects its accredited status and uses the official DEAC accreditation logo and/or statement of accreditation when publishing its accreditation status in advertisements and promotional materials on its website, and in social media. DEAC's name, address, telephone number, and web address are published in the institution's catalog.

1. *The institution publishes a statement of accreditation only as follows:*

- *Accredited by the Distance Education Accrediting Commission*
- *DEAC Accredited*

2. *The institution refers to DEAC's recognition by the U.S. Department of Education only as follows: "The Distance Education Accrediting Commission is listed by the U.S. Department of Education as a recognized accrediting agency."*

3. *The institution refers to DEAC's recognition by the Council for Higher Education Accreditation (CHEA) only as follows: "The Distance Education Accrediting Commission is recognized by the Council for Higher Education Accreditation (CHEA)."*

4. *The accredited institution publicly corrects any misleading or inaccurate information it releases on its accreditation status, contents of its on-site team reports from accreditation-related visits, and/or actions taken by the Distance Education Accrediting Commission with respect to the institution.*

The Chair's Report stated that CHS must correct all statements referencing DEAC or its DEAC-accredited status that do not conform with Standard VII.B. and provide evidence that the corrections are being implemented.

As noted above, the Commission expressed concern regarding this FAQ on the CHS website: "Can I use my diploma to attend college or gain employment?" "Yes. While CHS does not guarantee employment, our diploma is nationally accredited and our diploma is accepted at most public and private universities..."⁶ This is not a DEAC-approved statement nor is it an appropriate reference to DEAC and accreditation. The claim that most public and private universities accept CHS's diploma has no source nor evidence to support such a claim.

⁵ <https://citizenshighschool.com/frequently-asked-questions/>

⁶ <https://citizenshighschool.com/frequently-asked-questions/>

The Commission noted that DEAC accreditation is further misrepresented in the document posted on the CHS website entitled *Orange Couch Conversations* where statements such as “Credit recognized internationally,” “credit accepted internationally,” and “2nd oldest nationally accredited school in America” appear within that document.⁷ These statements are misleading and inappropriate.

The Commission is gravely concerned regarding the findings enumerated in items 1-3 of this letter. It is requiring immediate and effective action on the part of CHS to correct inconsistent, inaccurate, and misleading statements on its website. A detailed response and evidence of updates to the CHS website is due to DEAC staff via email to Kimberly Cook (Kimberly.cook@deac.org) within ten (10) days of this letter and **no later than close of business on August 1, 2022 for review by the Commission at its August 2022 meeting.**

The Commission has set December 1, 2022 as the deadline for CHS to respond to the following concerns. This is subject to the outcome of the Commission’s August 2022 meeting. CHS will receive additional instructions following that meeting.

4. Standard I.B. Review and Publication of the Mission

The institution’s leadership, faculty, staff, administrators, and other stakeholders regularly review the mission to assure continued institutional quality and viability. The published mission statement is readily accessible to students, faculty, staff, other stakeholders, and the public.

and

Standard I.C. Information on Achievement of the Mission

The institution identifies key indicators it uses to demonstrate that it is effectively carrying out its mission. The institution documents the achievement of its mission and shares appropriate information on this achievement with relevant groups (e.g., Advisory Councils, faculty, staff, students, and the public).

The Chair’s Report stated that the institution did not provide evidence to support regular review of the mission by the institution’s leadership, faculty, staff, administrators, and other stakeholders. The Chair’s Report directed CHS to provide evidence that its leadership, faculty, staff, administrators, and other stakeholders regularly review the mission.

In addition, the Chair’s Report stated that CHS did not provide evidence that the institution systematically collects data on its effectiveness and that the absence of such data made it difficult to determine if the institution is achieving its stated mission: *that completion of its high school diploma program leads to social and economic mobility*. The Chair’s Report directed the institution to provide evidence that it collects data on all its key indicators to

⁷ <https://trconversations.com/orange-couch-conversations-course/>

document achievement of its mission and that the data on this achievement is shared with relevant groups.

In reviewing the response to the Chair's Report, the Commission noted that

1. CHS adopted a plan to gather institutional data on April 25, 2022 and implemented the plan in May 2022. More evidence is needed to demonstrate implementation of the plan.
2. There is inconsistent representation of the CHS mission within the institution's published materials. Specifically, a "letter from the CEO" published on CHS's website states, "At CHS, our mission is to solve your education challenge and provide you with a personalized 'take me home solution.'" CHS's SER and response states "completion of its high school diploma program leads to social and economic mobility."⁸
3. The response did not provide clear evidence that the CHS mission statement is readily accessible to students, faculty, staff, other stakeholders, and the public. Evidence that the mission statement is embedded within the institution's handbooks and data management systems does not demonstrate that the statement is readily accessible to the public.

The Commission is therefore requiring that CHS:

1. Clarify its mission statement.
2. Demonstrate that the mission statement is clearly and consistently disclosed on its website and within other published materials.
3. Provide documentation that it is implementing the strategic plan as presented in the response to the Chair's Report and demonstrate that these activities are producing evidence that CHS is achieving its mission.

5. Standard II.A. Institutional Effectiveness Planning

The institution demonstrates a commitment to its educational offerings and administrative operations through processes that monitor and improve institutional effectiveness. The institution engages in sound research practices; collects and analyzes evidence about its effectiveness; and develops action plans that are used to improve operations, educational offerings, and services.

The Chair's Report stated that CHS did not demonstrate compliance with Standard II.A. and directed the institution to provide evidence that processes are in place to gather and analyze evidence using sound research practices that inform decisions and continuous improvement efforts. The report stated that CHS was required to provide an institutional effectiveness plan that included (1) clearly stated key indicators for institutional goals and benchmarks, (2) methods for data collection, (3) a schedule for the review and assessment of the data, (4) procedures for developing and refining action plans, (5) results of data

⁸ <https://citizenshighschool.com/why-citizens/messagefromthecceo/>

analysis and trends, and (5) evidence that CHS is implementing its action plans and demonstrating progress toward the goals identified within the action plans.

In response to the Chair’s Report, CHS submitted a document entitled “Institutional Effectiveness Guide” that described planning activities and data gathered for the first quarter of 2022. The Commission expressed concern that CHS did not provide evidence that this practice has been in place during its accreditation cycle as required. Further, the plan for institutional effectiveness focuses on strategies for enrollment growth and marketing, as opposed to clearly demonstrating that established strategies for institutional effectiveness are being implemented, reviewed, and evaluated in relation to student learning. For example,

- Key indicators are focused primarily on enrollment growth and marketing, as opposed to indicators designed to improve operations, educational offerings, and services to students.
- CHS provided information on student retention data but did not provide a clear explanation of how student retention data is utilized for improvement. For example, CHS provided a graph labeled “Retention Rate Based on Time Period” that shows a 70 percent retention rate over 12-months but did not include an explanation of what the data represents in relation to institutional effectiveness (e.g., course-to-course retention, year-to-year retention) or other measurements that are typical to secondary school assessment practices.
- CHS presented another data point indicating that 60 percent of its students were not persisting at an “appropriate pace of learning.” CHS’s response was that the institution would “attempt to get that number down to below 40%,” but CHS provided no further analysis and offered no plan of action for improving persistence. The Commission expressed concern that CHS does not have a coherent plan for institutional effectiveness and requires the following:
 1. CHS must demonstrate that it engages in sound research practices that are developed through an institutional effectiveness plan and are relevant to the CHS mission, graduation rates, course retention rates, student demographics, partnerships, and plans for sustainability.
 2. CHS must demonstrate it is implementing institutional effectiveness activities in accordance with DEAC requirements and provide documentation that is relevant, complete, clear, and based on sound research and analysis.

6. Standard III.A. Description of Program Outcomes

Program outcomes are clearly defined, simply stated, and indicate the benefits for students who are reasonably capable of completing the educational offering. Course learning outcomes are linked to program outcomes as identified by the institution and are consistent with the curricula offered.

The Chair's Report stated that the institution did not provide course outcomes or curriculum maps to document the descriptions provided within the SER narrative, nor did it provide documentation to substantiate the school's claim that CHS's program and course outcomes are aligned with Florida standards.⁹

The Commission determined that the response did not demonstrate compliance with Standard III.A. CHS provided a curriculum chart indicating that every course is linked to every program outcome without providing an explanation of why it reached this determination. CHS's response included an exhibit for this standard with a selection of disparate screenshots of the CHS Learning Management System and indiscernible references to Florida standards. CHS did not demonstrate that it follows a coherent practice of linking course outcomes to program outcomes (e.g., alignment with effective pedagogy, appropriate sequence of study, consistency with Florida standards).

CHS must provide a revised curriculum map for each program. CHS must provide an explanation for its determination of course outcomes linked to program outcomes. The Commission noted with concern that CHS represents to parents, students, and the public that it follows Florida standards for high school curriculum. Evidence of this claim must be provided in CHS's response.

7. Standard III.B. Appropriate Program Outcomes

The program outcomes are measurable and reasonably attainable through distance education. Appropriate program outcomes clearly communicate the knowledge, skills, and abilities students will obtain upon completion of the educational offering. Program outcomes reflect the level of student achievement expected that promotes critical thinking, ethical reasoning, social responsibility, global citizenship, civic engagement, or lifelong learning as applicable to the educational offerings.

The Chair's Report required CHS to demonstrate that (1) program outcomes are appropriate to high school level learning, (2) program outcomes are comparable to the program outcomes at accredited high schools, (3) procedures are in place to measure achievement of program outcomes, and (4) students complete the required coursework to fulfill the program outcomes before graduating.

CHS needs to resubmit clear documentation demonstrating that it is meeting these requirements.

8. Standard III. E. Curricula Development and Delivery

⁹ <https://www.fldoe.org/academics/standards/> and <https://www.cpalms.org/Public/search/Standard>

1. Qualified persons competent in distance education instructional design practices work with experts in their subjects or fields to develop the content of all curricula and prepare instructional materials.

2. The institution describes its model for distance education delivery such as: correspondence, online, or hybrid.

3. Any contracting with a third party for educational delivery is conducted in accordance with DEAC Processes and Procedures, Part Two, Section XIII F.4 and F.5, Changes in Educational Offerings.

The Chair's Report directed CHS to take the following actions to demonstrate compliance with Standard III.E.

- Provide evidence that the CHS curriculum developers have appropriate subject matter expertise in the courses they develop and that it has policies and procedures in place to ensure that its stated qualifications for curriculum developers are met.
- Provide a complete list of curriculum developers, the courses and subjects for which they develop curriculum, and their qualifications in those subjects.
- Demonstrate the process by which it ensures that no more than 25 percent of any student's diploma program is comprised of courses offered by third-party vendors.

In response, CHS submitted a table listing the names of eight developers and a statement: "Upon review of the CHS course curriculum qualifications and feedback from the Chair's Report, the CHS curriculum developer qualifications have been updated."

CHS's response did not provide evidence that the developers possess the specific subject matter expertise for every course, as required by the Chair's Report. Although CHS provided a chart listing eight faculty members with credentials and experience, as well as its policies and procedures for curriculum development, it did not account for every course offered by the institution. CHS must revise and resubmit this exhibit and provide comprehensive documentation listing the developers and their qualifications that are associated with each course that CHS offers.

9. Standard V.A. Student Achievement

The institution evaluates student achievement using indicators that it determines are appropriate relative to its mission and educational offerings. The institution evaluates student achievement by collecting data from outcomes assessment activities using direct and indirect measures. The institution maintains systematic and ongoing processes for assessing student learning and achievement, analyzes data, and documents that the results meet both internal and external benchmarks, including those comparable to courses or programs offered at peer DEAC-accredited institutions. The institution

demonstrates and documents how the evaluation of student achievement drives quality improvement of educational offerings and support services.

The Chair's Report provided a detailed explanation of the gaps noted in the institution's plan for outcomes assessment. The Chair's Report stated,

“The institution must provide a comprehensive outcome assessment plan demonstrating that it documents and evaluates student achievement of outcomes using both direct and indirect measures. The institution must provide evidence of how the evaluation of student achievement drives quality improvements of its educational offerings and support services.” (DEAC Chair's Report, April 7, 2022: page 41)

CHS's response did not provide evidence that direct and indirect measures are in place within a clearly articulated outcomes assessment plan. Statements made by CHS in its response focused more on student satisfaction rather than achievement:

- “Student success is also measured by their satisfaction with the course content and curriculum. Based on our view of the 2022 student feedback results.”
- “Citizens Academic Leadership is working in partnership with the recognized subject matter experts, Dr. Harold Fisher and Ms. Christi Brewster, to review the course for student engagement, content, and enhancement. Recommended changes will be made and the end of course surveys will be reviewed to measure improvement.”
- “The courses and student ratings will be reviewed again to measure improvement.”

CHS must demonstrate that its outcomes assessment plan includes direct measures and indirect measures as part of an ongoing process for the evaluation of student achievement.¹⁰

10. Standard V.B. Student Satisfaction

The institution systematically seeks student and alumni opinions as one basis for evaluating and improving curricula, instructional materials, method of delivery, and student services. The institution regularly collects evidence that students are satisfied with the administrative, educational, and support services provided.

¹⁰ Examples of direct measures: exams, quizzes, tests, research papers, presentations, portfolios, graded practica. Examples of indirect measures: satisfaction surveys, interviews, focus groups, student self-assessment.

The Chair's Report required CHS to provide evidence of systematic and regular collection of student and alumni opinion data and evidence of student and alumni satisfaction data being used to improve or enhance its educational offerings and support services.

CHS provided links to surveys, but the links did not work. In order to evaluate the response to Standard V.B., the Commission needed

- survey responses;
- the time frame associated with the collection of data;
- the number of responses attained; and
- an explanation of how the data collected were being used to support decision-making focused on improvement.

Overall, the Commission could not verify that the alumni surveys are being used for the purpose described by CHS in its SER or that the survey process is being implemented in accordance with the standard. CHS must resubmit its response to Standard V.B. with appropriate documentation.

11. Standard VI.C.1, Instructors, Faculty, and Staff

Faculty/instructors are qualified and appropriately credentialed to teach the subject at the assigned level. The institution employs a sufficient number of qualified faculty/instructors to provide individualized instructional service to each student. The institution maintains faculty/instructor résumés, official transcripts, and copies of applicable licenses or credentials on file. Faculty/instructors are carefully screened for appointment and are properly and continuously trained on institutional policies, learner needs, instructional approaches and techniques, and the use of instructional technology. The institution regularly evaluates faculty and administrator performance using clear, consistent procedures. The institution assures that faculty are appropriately involved and engaged in the curricular and instructional aspects of the educational offerings. Faculty are assigned responsibilities based on their degree qualifications and/or area(s) of expertise.

1. High School

The institution provides evidence that all faculty/instructors are qualified and appropriately credentialed to teach the subject and level within the high school program offered.

The Chair's Report provided clear instructions to CHS regarding the documentation needed to demonstrate compliance with Standard VI.C.1. During the site visit, the evaluation team had found (1) varying responses and information regarding CHS instructors listed within the SER, (2) inconsistencies within records provided during the site visit, (3) variances in information provided on the website, and (4) inconsistent information within the instructor handbook. In response, CHS referred the Commission to Exhibit 6C for evidence of instructor credentials and professional development.

However, the Commission found that Exhibit 6C was a blank table and could not verify that CHS meets Standard VI.C.1.

In searching for information on the qualifications of instructors via CHS's website, the Commission found a statement published under the FAQ section indicating that CHS faculty are state certified.¹¹ The Commission requires documentation to demonstrate that the CHS instructors are certified as indicated by CHS's website.

Upon review of CHS's response to Standard VI.C.1., the Commission determined that CHS must provide

1. evidence that consistent policies and procedures are in place for determining instructor qualifications and teaching assignments;
2. evidence that instructors are assigned courses based on their credentials and experience;
3. documentation that instructors participate in professional development activities;
4. documentation that instructor qualifications are accurately represented to the public to include evidence of the "state certification" referenced on the CHS website; and
5. a chart listing each instructor, with their course teaching assignments and degree qualifications.

13. Standard VIII A. Admissions Disclosures

Admissions policies and procedures are designed to assure that the institution enrolls only those students who are reasonably capable of successfully completing and benefiting from the educational offerings.

- 1. The institution informs each applicant, prior to admission, of the admissions criteria, the nature of the education provided, and the demands of the educational offerings. Prior to completing the enrollment process, the institution requires students to affirm access to the catalog and other institutional documents disclosing the rights,*
- 2. The institution admits students regardless of race, color, national origin, disability, sex, or age. Institutions reasonably accommodate applicants and students with disabilities to the extent required by applicable laws.*
- 3. Official transcripts, if required for admission, are received within one enrollment period not to exceed 12 semester credit hours, or the student is withdrawn from the program.*

¹¹ <https://citizenshighschool.com/frequently-asked-questions/>

The Chair's Report directed CHS to provide evidence that it has policies and procedures in place to ensure that only those students who are reasonably capable of successfully completing and benefiting from the educational offerings are enrolled at the school. CHS also needed to demonstrate that policies for any transcript requirements are clearly stated and that CHS follows its procedures whereby students are withdrawn from the program if a required transcript is not provided within one enrollment period. Lastly, CHS needed to demonstrate that students affirm receipt of the catalog/school handbook prior to enrollment.

In response to the Chair's Report, CHS attested that students whose transcripts are not received within 60 days are moved to an inactive status and will be asked to withdraw. This is not consistent with the statement in the article "Dual Country Diploma CHS," (page 1) "Having trouble getting your transcripts? No Worries! If you are having trouble getting your official or unofficial transcript, you may still enroll and immediately start taking classes at COHS..."¹²

The Commission noted that CHS has implemented an "Extension Policy" fee. CHS must demonstrate that the enrollment agreement gives parents the opportunity to review the total cost under the extension option.

14. Standard VIII. D. Admissions Criteria

The institution's admissions criteria align with its mission and student population served. The institution establishes qualifications that an applicant possesses prior to enrollment in order to successfully complete the stated educational offerings. The institution consistently and fairly applies its admission requirements. If an institution enrolls a student who does not meet the admissions criteria, the institution documents the reason(s) for the exception to the admissions criteria.

1. Transcripts not in English are evaluated by an appropriate third party and translated into English or evaluated by a trained transcript evaluator fluent in the language on the transcript. Evaluators possess expertise in the educational practices of the country of origin and include an English translation of the review.

2. The institution's admissions criteria disclose procedures for verifying appropriate language proficiencies. The institution verifies English language proficiency for applicants whose native language is not English and have not earned a degree from an appropriately accredited institution where English is the principal language of instruction. Verification procedures align with DEAC's guidance on English Language Proficiency Assessment.

¹² <https://citizenshighschool.com/academies/online-high-school-espanol-program/>

The Chair's Report raised questions regarding international activities and stated that CHS must:

- Provide evidence that it discloses and consistently publishes all transcript requirements in its admissions policy.
- Demonstrate that transcripts not in English are evaluated by an appropriate third party and translated into English or evaluated by a trained evaluator fluent in the language on the transcript.
- If only internal personnel are evaluating the transcripts for students from countries where CHS has conducted country studies, the institution needs to provide evidence to demonstrate the expertise of internal transcript evaluators in the educational practices of the countries of origin.
- Document whether basic English proficiency is a requirement or recommendation for admission, and if it is a requirement, how the institution verifies the required level of proficiency.

Upon review of the institutional response and the CHS website, the Commission found that CHS advertises it has "students and affiliates in 5 different continents and over 2 dozen countries," but the Commission understands that international activities have not been approved by DEAC. Furthermore, CHS also has a logo for Education Abroad International which, on its Facebook page, claims to be an admissions department for over 30 universities.

CHS must provide an explanation and documentation of its relationship with Education Abroad International, as well as a detailed explanation of "affiliate student" and its admissions criteria for such students.

15. Standard VII. G. Enrollment Agreements

The institution's enrollment agreements/documents clearly identify the educational offering and assure that each applicant is fully informed of the rights, responsibilities, and obligations of both the student and the institution prior to applicant signature. The institution complies with the DEAC Enrollment Agreements Disclosures Check List.

1. The institution requires that, prior to accepting the enrollment agreement, students affirm and accept the tuition refund policy and the rights, responsibilities, and obligations of both the student and the institution. The terms of the tuition refund policy are published in the institution's enrollment agreement, catalog, and website.

2. An enrollment agreement is not binding until it has been submitted by the student and accepted by the institution. A copy of the accepted enrollment agreement is made available to the student within 10 days of acceptance and maintained as a part of the student's record.

3. The institution complies with the applicable Truth in Lending Act (TILA) requirements, including those under Regulation Z, and state requirements for retail installment agreements.

4. All required state and Truth in Lending Act disclosures are included on the enrollment agreement. Requirements for type size, notice to buyer and computations examples, as applicable, are observed.

5. If there is a separate payment contract, the contract is incorporated in the enrollment agreement.

and

Standard IX.A Financial Disclosures:

All costs relative to the education provided by the institution are disclosed to the prospective student [in an enrollment agreement or similar contractual document] before enrollment. Costs must include tuition, educational services, textbooks, and instructional materials; any specific fees associated with enrollment, such as application and registration fees; and fees for required services such as student authentication, proctoring, technology access, and library services.

1. The costs for optional services, such as expedited shipment of materials, experiential portfolio assessment, or other special services, such as dissertation binding, are clearly disclosed to prospective students as not subject to refund after the five (5) calendar day student-right-to-cancel enrollment.

2. The institution's disclosure of its refund policy must include a sample refund calculation that describes the calculation methodology using clear and conspicuous language. Student acknowledgement of the refund policy is obtained and documented in the enrollment agreement or similar contractual document prior to enrollment.

The Chair's Report noted that the description of CHS's refund policy indicates a registration fee, yet the amount of a one-time registration fee is not listed on its website, catalog, or other disclosure. In response, CHS replied that it did not have a registration fee, but instead, decided to create a new fee called an "Enrollment Fee." CHS also created an "Extension Fee." The Extension Fee is described as "4-week and 16-week extension fees that involves a monthly charge of \$129 for online students \$99 for offline students." The request for the extension fee and additional costs are submitted in writing by the student to the Chief Academic Officer (CAO). The parent is not involved in approving that extension, its charge, or in determining whether it is in the student's best interest to progress in the course.

CHS must present more information to demonstrate its compliance with Standard IX.A., to include (1) the rationale for the Enrollment and Extension Fees, (2) the policies for the administration of the fees, (3) how parents are notified of course extensions and the Extension Fee, and (4) how the CAO determines an extension is warranted.

16. Standard IX.B. Cancellations

1. Institutions must maintain, publish, and apply fair and equitable cancellation and withdrawal policies. A student's notification of cancellation may be conveyed to the institution in any manner the institution deems appropriate so long as the method or methods chosen

a. are in compliance with applicable federal and state requirements and

b. do not create unreasonably difficult requirements for the student to satisfy. Institutions must designate the manner in which students may submit cancellation or withdrawal notification and the individual, office, or offices to whom students may submit notice of official cancellation or withdrawal.

2. A student has five (5) calendar days after signing an enrollment agreement or similar contractual document to cancel enrollment and receive a full refund of all monies paid to the institution.

3. A student requesting cancellation more than five calendar days after signing an enrollment agreement, but prior to beginning a course or program is entitled to a refund of all monies paid minus:

- An application/transfer credit evaluation fee of up to \$75;*
- A one-time registration fee per program of no more than 20% of the tuition and not to exceed more than \$200; and*
- Library services fee, if provided by a third-party service (e.g., LIRN, Westlaw, ProQuest, EBSCO)*

4. Upon cancellation, a student whose costs for education are paid in full, but who is not eligible for a refund, is entitled to receive all materials including kits and equipment.

5. If promissory notes or enrollment agreements are sold to third parties, the institution ensures that it and any third parties comply with DEAC cancellation policies.

The Chair's Report directed that the institution must provide information regarding the Student Protection Plan referenced in its enrollment agreement and that the institution

needed to provide evidence that all students are made aware of this plan and the associated costs prior to enrollment.

Upon review of the institutional response, the Commission determined that the procedures for administering the Student Protection Plan referenced in the Enrollment Agreement are unclear. The Commission requires (1) copies of the policies CHS follows for the Student Protection Plan, (2) evidence that the associated costs are presented clearly to the student prior to enrollment, and (3) a revised copy of the Enrollment Agreement demonstrating implementation of clear disclosures.

Show Cause Remediation Period. The maximum Show Cause Remediation Period may not exceed two years (unless the Commission extends the period for “good cause” as defined below). The burden of proof rests with the institution to demonstrate, within the Show Cause Remediation Period (as that may be extended for good cause shown) and consistent with the terms of the show cause directive, that it is meeting DEAC’s accreditation standards.

Decision Following Show Cause Remediation Period. Upon review of the application for accreditation or reaccreditation of an institution that has previously received a show cause directive, a decision is made on the institution’s compliance with the accreditation standards or requirements noted in the directive.

The Commission may:

- vacate the show cause directive and either defer a final accreditation decision or grant accreditation or reaccreditation if it is determined that such action is warranted;
- continue the show cause directive and require the submission of additional information or further reports from the institution and/or a special visit in accordance with Section X.A.; or
- deny accreditation or withdraw reaccreditation.

Status During Pendency of Show Cause Directive. An institution under a show cause directive will retain its accreditation status unless and until the Commission decides to deny or withdraw its accreditation, as applicable. Notice of the show cause directive will be published on DEAC’s website and must be included by the institution in its description of its accreditation status, in accordance with the terms of Section XV.E., Processes and Procedures.

Teach-Out Agreement. Institutions subject to a show cause directive must file a Teach-Out Agreement, in accordance with Section XXI.C., Part Two, Processes and Procedures, DEAC *Accreditation Handbook*. The Teach-Out Agreement with an accredited high school is due no later than **August 22, 2022**.

DEAC Notification Procedure. In accordance with its procedure for Notification and Information Sharing, DEAC *Accreditation Handbook*, Part Two, Processes and Procedures Section XV.E. and F., and 34 Code of Federal Regulations §602.26(b)(1), the Commission

provides written notice to the U.S. Secretary of Education, other relevant government agencies (e.g., Department of Labor, Department of Defense, Job Corps,) the appropriate state licensing or authorizing agencies, and the appropriate accrediting organizations at the same time it notifies the institution of the decision, but no later than 30 days after the Commission makes a decision to place an institution on show cause. The Commission publishes on its website, including on its directory of institutions page, notice of the decision and a summary of reasons for the decision within one business day of its notice to the institution.

Disclosures to Students and Prospective Students. The Commission requires the institution that is subject to the show cause directive to disclose the action to all current and prospective students within seven business days of receipt of the written notice of the show cause directive. Such notice must, at minimum, meet the requirements of Section XVI.A.2. Processes and Procedures. CHS must ensure that such disclosures regarding the accreditation status of the institution remain current.

Recap of Response Deadlines

- 1. The Commission requires evidence that CHS has provided notice of the show cause directive to all current and prospective students and evidence of compliance with Standards V.C., VII.A., and VII.B. by close of business on August 1, 2022 for review by the Commission at an August 2022 meeting.**
- 2. The Commission requires a Teach-Out Agreement in accordance with Section XXI.C., Part Two, Processes and Procedures, DEAC *Accreditation Handbook* on August 22, 2022.**
- 3. Should the show cause directive remain in effect through January 2023, the Commission requires a response to items 4 – 16 on December 1, 2022 for consideration at the January 2023 meeting.**

Should you have any questions, please contact me directly at Leah.Matthews@deac.org.

Sincerely,



Leah K. Matthews
Executive Director

cc: Dr. Cheryl Hayek, Chair of the Distance Education Accrediting Commission