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November 7, 2023

Dr. Scott Eidson  
President and COO  
Apollos University  
600 Central Avenue, Suite 215  
Great Falls, MT 59401

Dear Dr. Eidson:

The Distance Education Accrediting Commission (the Commission) met on October 11, 2023 and considered Apollos University's (AU) response to two complaints, as well as its proposed teach-out agreement and notification of its intention to cease enrollments and allow its accreditation to lapse in December 2024.

Upon review of the record, which included DEAC's August 3, 2023 letter of inquiry into the complaint, the institution's August 18 and September 29 responses, DEAC's August 29, 2023 letter related to concerns raised through an inquiry by the Hong Kong Council for Accreditation of Academic and Vocational Qualifications (HKCAAVQ) and the institution's September 29 response, and the institution's September 29, 2023 notification of its intention to cease enrollment and allow its accreditation to lapse, the Commission voted to direct the institution to show cause as to why its accreditation should not be withdrawn.

The show cause directive will remain in effect as DEAC reviews information provided by AU in accordance with the requirements set forth in this letter. The Commission may modify the scope of the show cause directive or may withdraw the institution's accreditation if it is determined that such action is warranted. The Commission did not accept Apollos's proposed plan of closure having found that it is not an acceptable response or solution to the Commission's concerns. The Commission will only consider AU's request for continuing accreditation if and when the requirements of the Show Cause directive are satisfied. If AU wants to remain accredited by DEAC, it must demonstrate that it can meet all of its compliance obligations as an accredited institution as well as the requirements described in this letter.

### **Procedural History**

DEAC received a complaint on June 15, 2023, alleging that Apollos University and its professional development partner(s) were misleading students about DEAC accreditation through marketing and advertising targeting Vietnamese consumers. Specifically, the complaint alleged that Apollos University's professional development partner, Madison

Professional School (Madison), through its affiliation with Apollos University, was claiming that its certificates are approved or endorsed by DEAC. DEAC conducted its own review of this matter, which identified statements that, when translated into English, stated: the “TESOL 120h certificate is provided by the Madison School of Development (U.S.A) and its quality is certified by the DEAC committee (U.S.A).” A link to the statement was provided to Apollos in a letter from DEAC dated August 3, 2023. In that letter, DEAC indicated it had found these statements to be false and misleading and directed Apollos to require Madison School of Development to cease and desist from any inaccurate or misleading statements relative to DEAC. Apollos was to provide a response by August 18, 2023. DEAC requested additional information from Apollos in an August 29, 2023 email, which was provided. The Commission reviewed this matter at the October 11, 2023 meeting and accepted Apollos’ response that they had closed the School of Professional Development and ended all agreements. Apollos supplied a table with the information requested by DEAC for the now “former” SPD partners. The Commission concluded on that basis that the complaint could be closed.

### **Inquiry Received from HKCAAVQ**

In the August 29, 2023 email, DEAC also informed Apollos of an inquiry from the Hong Kong Council for Accreditation of Academic and Vocational Qualifications (HKCAAVQ). The inquiry from HKCAAVQ expressed concerns about students being admitted to Apollos University without a proper demonstration of English proficiency under DEAC standards. In a letter dated August 29, 2023, DEAC notified Apollos that, insofar as the HKCAAVQ is a quality assurance organization in Hong Kong, its inquiry would be treated as a complaint under Part Two, Section XXII, Process and Procedures, *DEAC Accreditation Handbook*. The letter specified the allegations of noncompliance with DEAC standards as follows: (1) Apollos accepted students into its degree programs whose native language is not English and who have not earned a degree from an appropriately accredited institution where English is the principal language of instruction (Standard VIII.D.2., *DEAC Accreditation Handbook*); and (2) Apollos did not implement English proficiency verification procedures in accordance with DEAC’s guidance on English Language Proficiency Assessment (Part Four, Section IX. English Language Proficiency Assessment, *DEAC Accreditation Handbook*).

In response to the August 29, 2023 letter, Apollos was required to provide information pertaining to Douglas Business School and Spectrum Business School, both schools from which students had allegedly articulated credits into Apollos bachelor’s and master’s degree programs as a means of establishing English proficiency under Apollos admissions policies. Among the information requested was evidence that English is the principal language of instruction at the two schools and that they are accredited or hold equivalent status with the Ministry of Education in the countries where they operate. In addition to other requirements, Apollos was specifically directed to explain and justify the admissions decisions presented in records of seventy-two (72) students that had been provided to DEAC by HKCAAVQ and any other information demonstrating its compliance with Standard

VIII.D.<sup>1</sup> Apollos responded to the August 29, 2023 letter on September 29, 2023. At the Commission's October 11, 2023 meeting, the Commission considered the record of the HKCAAVQ complaint and all information provided by Apollos and concluded that Apollos is out of compliance with DEAC accreditation standards, as described below.

1. The information provided in Apollos's response to the August 29, 2023 letter lacked clarity, was incomplete, and did not demonstrate the institution's compliance with Standard VIII.D.2. or Part Four, Section IX. English Language Proficiency Assessment Guidelines).
  - a. The section on admissions requirements in the institution's catalog makes no mention of English proficiency and does not indicate that transcripts from non-U.S. institutions need to be evaluated. On page 29 of the catalog, there is information pertaining to non-English-speaking applicants that does align with DEAC's English proficiency requirements and includes a note about conditional acceptance. Under the note, students who successfully petition for conditional acceptance may take a maximum of four courses (12 credits). The information provided by HKCAAVQ, however, indicates that Apollos is not following its policy on conditional acceptance since many students admitted to Apollos have not taken English proficiency exams. Apollos did not explain this in its response.
  - b. According to Apollos, all students (even U.S. students) are accepted conditionally, and the institution's president and one other staff member trained in TEOSL are their first instructors. Apollos did not provide any documentation, assessment rubrics, or tools, for example, to demonstrate how the evaluation occurs. The data submitted for students admitted under conditional acceptance during the past 12 months indicated that one student ( ) has 13 credits in the MBA program but was conditionally accepted with a 2.69 GPA while the policy requires 3.0. Data provided for other students in the cohort was inconclusive since they had so few credits. Apollos did not provide any data or documentation to demonstrate the effectiveness of its admission policy for admitted students whose native language is not English.
2. Apollos was required to provide evidence that students who were admitted into Apollos degree programs came from appropriately accredited institutions where the principal language of instruction is English. The specific request was for Douglas Business School (Hong Kong, Macau, and Malaysia) and Spectrum International College of Technology (Malaysia). Apollos provided documentation showing that these institutions are approved and that they teach in English, but the documents did not conclusively establish that students admitted to Apollos received degrees or if they received

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<sup>1</sup> See August 29, 2023, letter from DEAC to Dr. Scott Eidson, President and COO of Apollos University p. 2, items 1-9.

instruction in English. There were no official transcripts from the previous degrees provided with Apollos' response.

3. In the August 29, 2023 letter, DEAC specifically required Apollos, in order to demonstrate compliance with Standard VIII.D., to explain and justify the admissions decisions presented in the records of the 72 students provided by the HKCAAVQ and any other information regarding its admission of students whose native language is not English and who have not earned a degree from an appropriately accredited institution where English is the principal language of instruction. Apollos did not respond to this request.

### **Required Information**

DEAC requires Apollos's response to the Show Cause directive to include the following information, to be submitted by Apollos no later than December 7, 2023. The response will be considered at the Commission's January 2024 meeting, and you will be notified of the outcome of the Commission's review thirty (30) days following the meeting.

AU needs to provide a clear and compelling rationale for why it should remain accredited until December 2024 to teach out its current students, including evidence that, in enrolling these students, AU adhered to DEAC's standards concerning admissions. Include the following information:

1. a roster of currently enrolled students;
2. transcripts from prior institutions attended by currently enrolled students;
3. evidence that all students have met AU's admission criteria, including requirements for English proficiency;
4. a teach-out plan that meets DEAC requirements under Part Two, Section XXI of the *DEAC Accreditation Handbook*; and
5. evidence that AU has the financial resources to support its teach-out plan through to completion in December 2024.

**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 period 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.

**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. In accordance with 34 *Code of Federal Regulations* §668.43(a) (19), the notice to enrolled and prospective students must include notice that the institution is being required by DEAC to maintain its teach-out agreement. AU must ensure that such disclosures regarding the accreditation status of the institution remain current.

Apollos is required to comply fully with all requirements of the show cause directive and to fulfill all reporting requirements and compliance obligations as conditions of its continuing accreditation. Continuing accreditation is completely contingent upon Apollos's ability to demonstrate its compliance with DEAC standards, policies, procedures, and other requirements.

The issues raised within this show cause directive are very serious and deeply concerning. Should you or your institution team members wish to have a call or meeting with me, please get in touch with DEAC staff to make arrangements.

Should you have any questions, please do not hesitate to contact DEAC staff.

Sincerely,

A handwritten signature in dark ink, appearing to read "Leah K. Matthews", with a long, sweeping horizontal line extending to the right.

Leah K. Matthews  
Executive Director

cc: Dr. Wanda Nitsch, Chair of the Accrediting Commission  
Bonnie Tam, Registrar, HKCAAVQ