

PROGRESS REPORT

Brooks College
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Sunnyvale, CA 94086

A Confidential Report Prepared for the Accrediting Commission
For Community and Junior Colleges

This report represents the findings of the evaluation team that visited

BROOKS COLLEGE

On

October 26, 2004

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DATE: October 26, 2004

TO: Accrediting Commission for Community and Junior Colleges

FROM: Donald F. Averill, Ed.D., Team Chair

SUBJECT: Progress Visit Report
Brooks College, October 26, 2004

Introduction:

A comprehensive visit was conducted to Brooks College in March 23-25, 2004. At its meeting of June 9-11, 2004, the Commission acted to require of Brooks College a progress report and visit. A progress report was due to the Commission by October 15, 2004. The visiting team, Dr. Donald F. Averill, Dr. Susan Shodahl, and Mr. Peter L. Crabtree, conducted the site visit to Brooks College on October 26, 2004. The purpose of the team visit was to validate the progress report prepared by the college and to determine if sustained, continuous, and positive movement toward institutional good practice had occurred.

In general, the team found that the college had prepared well for the visit by arranging for meetings with individuals and groups agreed upon earlier with the team chair and by assembling complete and appropriate documents in the meeting room used by the team. Over the course of the day, the team met with the President of the college, a member of the administration from Career Education Corporation, members of the Steering Committee, and selected members of the faculty, staff, students, and administration.

Following the accreditation team visit in March, several administrative changes took place. The title of Chancellor was dropped at Brooks College and that position is now President. The President at the Sunnyvale Campus is now an Executive Director. Al Nederhood is now serving as the President of Brooks College and Ron La Velle is the new Executive Director of the Sunnyvale campus and as such reports to Al Nederhood. In another change the college appointed Thomas Harris as the Vice President of Finance. He takes on responsibility for the Financial Aid and Tuition Planning Departments. The Admissions and Recruitment office is under the direction of a Vice President of Admissions. The Provost has been eliminated and a new position has been added to the college, Director of Institutional Effectiveness.

After receipt of the Commission recommendations and probationary placement, Brooks created a **college response Steering Committee** and separate sub-committees for each recommendation. The sub-committees met weekly and the steering committee reviewed the progress. Brooks reported that it is implementing participatory governance. Faculty, staff and students have been included in all sub-committees developed to respond to the Progress Report. The Visiting Team observed a great deal of involvement across the campus—i.e., faculty and some students—although student involvement is more difficult to maintain. This was a significant change from the March visit.

The Progress Report responds to the nine major recommendations presented by the Accrediting Commission for Junior and Community Colleges. It identifies the problem and establishes a timeline for addressing the recommendation. In addition, the college

goes on to address other recommendations from the expanded visiting committee report. Some of the timelines appear to be optimistic and the Steering Committee may want to re-evaluate progress on goals and objectives so that they can stay on target.

The Progress Report and visit were expected to document improvement in the following areas:

2. The college should address the need for substantial improvement in customer service quality of the financial aid program,* including full disclosure of the actual costs of attending Brooks College, actual career prospects, and the limitations of transferability of units and courses. Students should actively participate in the prioritization of specific operational areas needing improvement.
5. With input and participation from all college constituencies, including faculty, students, and management, the college should systematically address issues of academic assessment and rigor of programs. The college should also implement a system for remediation immediately following course failure.
6. The college needs to formalize key educational processes such as curriculum development, program review, program planning, and staff evaluations. This includes establishing timelines, identifying areas of responsibility, and creating mechanisms that lead to constructive, timely feedback for the improvement of instruction and student services.
7. The institution should move forward immediately to implement a comprehensive assessment, placement and remediation program to address student academic skill levels, with full faculty participation in the structure and implementation of the program. The institution should also review the need for higher standards related to the campus definition of satisfactory academic progress.
12. The college needs to develop and implement a systematic plan to address facility maintenance and facility upgrade issues and to pursue the institutional commitment to rehabilitate substandard facilities, including dorm bathrooms and ventilation systems, while avoiding student assignments to any dorm room having inadequate bath and/or toilet facilities. The college needs to provide adequate access for all students including the disabled in compliance with ACCJC standards. Allocate necessary resources to ensure recommendations are implemented in a timely manner.
16. The college needs to clarify its accreditation status and purpose with the ACCJC and the ACSCU regarding its migration to senior college status and work out a plan for that migration, if appropriate. The final decision should be fully disclosed to all constituent groups so that administration, faculty, students and staff understand the standards of accreditation to which the college will be held accountable.

The Commission was deeply concerned about overall issues of institutional integrity at Brooks College, and therefore, has added the following additional recommendations:

- A. The college must move to clarify with students the status of its quest to offer the Baccalaureate Degree, making it clear in publications, recruitment efforts, and

advisement that the offerings of such a degree is not part of its current status with ACCJC.

- B. The college must demonstrate that it is addressing the integrity of its relationship with students regarding financial aid, attendance costs, refunding of fees, transfer of credit and career prospects, and involvement in institutional governance.
- C. The college must demonstrate that it operates with integrity in its relationship with the Commission.

* The underlined statements in each recommendation are used to identify the specific topic being reviewed by the Progress Report Visiting Team.

College responses to the team recommendations:

- 2. *Addressing the need for substantial improvement in customer service and quality of the financial aid program.*

A pervasive concern of the previous visiting committees' efforts was the perception of serious customer service problems and a conflict of information between Admissions and Financial Aid. Interviews with students in the previous visit showed very low customer satisfaction. The visiting committee was also concerned about the number of admissions staff (40+ staff between the two campuses).

The sub-committee that addressed this recommendation held focus groups with students. This activity resulted in personnel changes in the financial aid staff which is now under the direction of the VP of Finance. The College changed and upgraded minimum qualifications for financial aid officers. A search for replacement financial aid staff required applicants with college degrees and customer service backgrounds.

Brooks still has a very large marketing and admissions staff – 30 people. Brooks has revised its enrollment agreement and created a customer service response card. Within the first five days of each semester, students may receive a full refund of tuition paid. Staff is seeking better integration between the financial aid office and admissions office. The admissions staff is composed of five functional groups with specific responsibility for high school admission, adult admission, international admission, national admission, and other admissions categories.

The visiting team conducted interviews with members of the financial aid, admission staff, management and students. Casual conversations with a number of students yielded the following:

- All the students were impressed with the faculty and programs.
- There are still some concerns regarding financial aid services (late checks, having to check weekly to make sure that nothing goes wrong), but the 5th term students have seen a distinct improvement in the attitude of workers in the financial aid office.

- The students seemed pleased with the approach and responsiveness of President Nederhood.

This small and nonscientific survey supports the previous visit's observation that the faculty and programs are appreciated but that there are still some issues with financial aid services and housing. At the same time, there is a much more positive atmosphere on the campus.

Conclusion:

The college made a conscious effort to address the concerns of the visiting team from the March visit. A major change was made in personnel including an organizational change to place the financial aid responsibility under a new Vice President of Finance. A focus has been given to customer service and creating a staff that would be responsive to the students.

Interviews with students did not find significant concern about the information being given out in the financial aid office. One student was identified that indicated that he keeps in constant contact with the financial aid staff to ensure that payments are made in a timely manner.

The visiting team finds that the Admissions staff has also received additional training and changes have been made at this staff level. There was no evidence on this visit of any conflict with information being given to students that was countermanded by the financial aid staff. There does not appear to be a clear working link between admissions and financial aid. Efforts to provide ongoing review of the issues that were raised in the student surveys by these two units of the organization could ensure that student services are retained at a level that will meet student concerns.

5. *Progress in systematically addressing issues of academic assessment and rigor of programs.*

The college sub-committee that addressed the second recommendation revisited the proposed strategy promoted by Career Education Corporation to provide for student assessment using Accuplacer and remediation using Plato. At the time of the previous visit use of the Accuplacer instrument had been initiated and dropped. There was no evidence of faculty involvement in the use of the instrument, and the results and use of the instrument were inconclusive in affecting changes in student performance.

The sub-committee addressing this recommendation reviewed the efforts in student assessment and remediation. The college has developed a new assessment and remediation plan which is being implemented first on a pilot basis in the largest department, fashion design. Other departments will adopt this system in the spring. The instrument selected was to use Accuplacer; however, using Plato as a remediation strategy has been scrapped in favor of packages for Developmental English and Developmental math courses required of all students who score below the required cut scores on Accuplacer. The college is also restructuring general education components so that students will take general education English and math courses in sequence through the first quarters of

college work. Course sequencing was reviewed across the curriculum. The General Education Department is also looking to add/create a new course that would reinforce developmental courses and be taught in block with them—possible title is “Information Literacy/Critical Thinking”.

The sub-committee is still reviewing and finalizing its policy regarding student advancement out of the developmental courses: Will it be based upon retaking the Accuplacer assessment test and achieving scores above the cut level or will it be based on satisfactory class performance?

The visiting team was encouraged to find that any course failures included in the college major must be repeated in the next term. While this is a significant change from the previous practice of allowing students to complete the program before addressing failed work, there is a perception that the college is still grappling with preserving the cohort model. Faculty also noted that tutors for students needing extra help are much more available than before and that more tutors have been hired.

Conclusion:

Brooks College administration and faculty have taken the tracking of progress of students seriously. The administration is now working with the faculty in the implementation of an assessment model to ensure student academic readiness prior to placing them in programs. The general education program is being reviewed and more emphasis is being given to core competencies that the students will need in English, communications skills, and math. The installation of developmental math and English courses for remediation appears to be a much more durable and effective solution than the previously proposed “Plato” approach.

The college has also employed a Director of Institutional Effectiveness who will be working with the faculty and staff to define student progress and implement ways of promoting student success. The visiting committee finds that the college is working toward addressing student success and remediating student deficiencies.

The college needs to maintain its efforts to refine the current efforts to address academic success and rigor of programs. Creation and implementation of developmental courses and the addition of staff in institutional research is a good start. There will be a continued need to define general education requirements in each of the disciplines. The college also needs to address the establishment of an appropriate data base of student assessment to identify success and weaknesses in developing discipline competencies so a program of continuous improvement can be established.

6. *Progress in formalizing key educational processes such as curriculum development, program review, program planning, and staff evaluations.*

Brooks College administration established the same process as in other recommendations of establishing a specific sub-committee to review and implement processes for addressing this recommendation. The previous visiting team did not find sufficient evidence that faculty was involved adequately in the curriculum development, program review and planning, and significant questions

were raised about staff evaluation. This visiting team met with members involved in each of the committees established to address the recommendations. There is a significant change in faculty and student involvement.

According to faculty and staff, the Accrediting Commission made its point, and it has been incredibly healthy for the college. The administration and faculty are finally fixing things. Morale is higher. The college seems to be moving away from an ad hoc, band-aid approach to solving problems to a more systematic approach involving the creation of policies and procedures. Students are more involved and engaged.

There is a dramatic change in communication between administrators, faculty and students. Attendance is much improved. Changes to GPA and course repeat requirement policies have had an immediate positive impact on student performance.

Curriculum reviews were conducted from July to September. This involved department-wide discussions with faculty from Brooks Long Beach and Sunnyvale engaging in extended discussions.

The Department Chairs, who are really mini-deans with very limited teaching responsibilities, played a leadership role in the program review process with strong participation of the teaching faculty. The program review process looked at program rigor, reviewed master course outlines, reviewed student course projects, added portfolio development, and began to build student learning outcomes (SLO's) from course objectives. A Curriculum Development Committee has been established to formalize the curriculum review process; the Committee is currently chaired by the chair of the General Education Department.

Fashion Design has started moving from assessment planning to rubric development. Faculty at the college is responsible for creating and revising master course outlines. Information from industry advisors and career placement office feedback from students in industry are also used.

Faculty loads have been regularized. Full-time faculty has 24 student contact hours with an additional eleven hours for office hours, committee assignments, and curriculum development. The administration is working on areas of faculty evaluation and a Faculty Handbook has now been completed that reflects procedures that were absent at the time of the last visit.

A confidential report was delivered to the Accrediting Commission and to the Visiting team just before the visit. The document was purported to represent 23 faculty members. The document was not signed. Efforts by the visiting committee to validate the concerns expressed among those faculty were not successful. On the contrary, in carefully conducted interviews with faculty, the general observation is that morale is up and that a significant change has taken place in faculty involvement in resolving instructional issues.

Conclusion:

Brooks College administration and faculty have made tremendous progress in addressing the concerns that were raised by the visiting committee in March. Changes have been made in the administration, faculty has been included in the resolutions of curriculum and planning issues, and new efforts are underway to address ongoing data to support change. The evidence to this point is directed at the more significant issues of student success and the violations of standards for program performance. These have had significant attention and notable change that should serve the college well.

At the time of the last visit, the visiting committee found that the college did have a strategic plan. However, that plan was guided by the central administration of the Career Education Corporation. The plan was found to be deficient in addressing program review and in defining how financial planning was linked to the strategic plan of the college. While the college has addressed significant needs that relate to student performance, the visiting committee finds that renewed effort needs to be given to linking program review, planning and financial expenditures into a coordinated strategic plan as required by the Commission standards.

7. *Effort being made immediately to implement a comprehensive assessment, placement and remediation program to address student academic skill levels,*

Each of the recommendations of the visiting committee and the Commission resulted in the development of sub-committees to review and implement strategies for improvement. There is some overlap between Recommendation 2 and Recommendation 4. The college took the concerns of the visiting committee and the Commission seriously and significant progress was made regarding this recommendation.

The Provost position was terminated and the funds were used to acquire a Director of Institutional Effectiveness. With the departure of the "provost," The Dean of Education reports directly to the President. The President is very education focused and responsive.

A finding in the meetings with the faculty regarding implementation of the Accuplacer System revealed that the first quarter cohort was advanced regardless of cut score at conclusion of course. In subsequent cohorts, students who fail developmental education courses will have to retake those courses. Moreover, program progress minimum standards have been upgraded to "C" (2.0) or better for entire residency in program.

Curriculum and program review process is well along. Some melding of major course/content has been done to make room for additional general education courses. The faculty is seeking to develop a culture of evidence for general education requirements. That is a significant change from the previous findings in March.

A Brooks College team just attended a WASC workshop on assessment. The Dean of Education feels like she has more resources to work with in carrying out program/curriculum reform. The Dean plans to dig deeper into program revisions and work with faculty to begin alignment with Student Learning Objectives (SLOs). The Dean of Education is planning to roll out assessment activities with faculty,

aligning program objectives with SLOs. She estimates that it will take about two years to fully implement alignment of SLOs for all programs. The college will start with one discipline as a pilot and then move on to the others.

Conclusion:

The general observations of the visiting committee is that the administration and faculty are making significant progress in addressing remediation, course review and course rigor all of which were concerns of the previous visit. The issue of student learning outcomes (SLOs) and remediation of students that are not successful is being addressed. The evidence shows that the college is now looking at core competencies of students and that an effort is being made to provide better placement. The progress is slow on addressing students who fail courses, but the faculty feel comfortable that this need is being addressed and that they are getting a handle on assessing and remediating student competencies.

While significant changes are in place for addressing core competencies for meeting course work, the college needs to continue its effort to develop a data base that will assist the faculty and administration in defining areas where improvement is needed to assist students in successfully completing the curriculum. While significant course review has taken place since the last visit, there is still a need for the college to focus on strategic planning so that a link is developed with program review, strategic planning and budgeting to meet the goals of the college.

12. *Effort to address facility maintenance and facility upgrade issues.*

The previous visiting committee had significant concerns about the health and safety of the facilities, particularly as it related to the housing units for students. There was evidence of long-term leakage, mold, and plumbing problems in the housing facilities. While the issue of disability access was addressed in the old buildings, much of the access for these students was inconvenient and out of the way. At the time of the visit, there existed plans to make major modifications to the facilities, but problems were being raised with the City of Long Beach in regard to Conditional Use Permits and parking restrictions.

The efforts to get permits from the City of Long Beach to start rehabilitation work have been hampered by difficulties in working with the City. Several changes have been completed to comply with the Conditional Use Permit (CUP) for this project. This has included adding parking spaces on the campus and reducing the useable building space to comply with parking and use requirements. Much of this work was completed at the time of the visit and final permits were granted the day before the visit. This will allow the planned renovations to take place with an optimistic plan of completing most of that work within the next six months.

The sub-committee identified to review facilities and maintenance included at least one student. The committee confirmed that the dorms were a big issue in student dissatisfaction. The college identified a thirteen-member committee with five sub-committees including a sub-committee for classrooms and technology and one for renovation. Las Palmas building housing units has been empty since March

except for classrooms. Repair and rehab of Las Palmas will be extensive including re-plumbing of all bathrooms. A new ventilation system is scheduled throughout as well.

This committee is chaired by the Vice-President of Administration and consists of the Director of Maintenance, the Director of Public Safety, the Director of Residence Life and Student Programs, four instructors, and two students. Eight members of the committee were present for the accreditation meeting. The following are the key points made during the session:

- The Vice President of Administration took over facility maintenance in 2003 and has been trying ever since to address neglected issues, especially in the residence units.
- The Las Palmas residence is in the process of being renovated—all of the bathrooms have been gutted and work will begin on enlarging and improving them. It is anticipated that similar work will occur in the other residences within the next six months. Several rooms will be ADA compliant.
- Students and staff have been involved in selecting the colors to paint the exterior of the buildings, and it is anticipated that awnings will be installed on second and third floor windows to enhance the appearance of the buildings.
- At the present time, sixteen female students are housed in the Guesthouse Hotel about a mile from the college and are shuttled to and from the college. These students volunteered to be housed there.
- Memos are slipped under the doors of the dorm rooms to apprise the residents of facility changes and improvements.
- The college has signed a maintenance agreement with an air conditioning company for service.
- The ventilation system has been improved in all dorm rooms.
- The college gained 37 parking spaces under the cafeteria and provides student parking at off-campus sites including the Veterans' Hospital, the community playhouse, and a nearby church. The college has a lease with a shuttle service which provides service from 7 a.m. to 4 p.m. The vehicles have a 25-person capacity without ADA accommodation and a 22-person capacity with ADA accommodation. A courtesy escort service is available after 6 p.m.
- The cafeteria has a new ceiling and will eventually have a new roof. There are plans to make the cafeteria bathrooms ADA compliant.
- The bookstore has been moved to a new location and is now several times larger than the previous bookstore. It is, however, more difficult to find.
- There have been fewer neighbor complaints and neighbors have been added to a mailing list for information regarding college activities. Only a handful of neighbors attended three open houses offered recently.
- Several new students registered concerns about the heating and air conditioning problems, broken light fixtures, and response delays following the submission of work requests.

The committee members seemed excited about their work and the potential for enhancing both the functionality and the appearance of the facilities. The students present did not believe that there were any significant problems in the residences. A tour of Las Palmas showed that work is in progress.

The visiting committee received a series of complaints from students about the condition of the facilities. These complaints were also forwarded to the Commission. A review of the complaints shows that most of these complaints were filed prior to the March visit. Only one was filed three days after the visit. It is the finding of the visiting committee that most of these complaints have been addressed and the college is making good progress in addressing the concerns of the March visiting team.

Conclusion:

Brooks College has been addressing the facilities recommendation and has taken steps to ensure that all students housed in campus housing facilities are in a safe environment. Sixteen students that were formally housed in the most questionable facilities are now housed off campus and the building needing the most repairs has all of the housing units off line. Plumbing, ventilation, and other safety issues have been resolved. The campus is investing over \$1.8 million in the next year to renovate the campus. At the time of the visit the permits to begin the major renovation had been granted by the City of Long Beach and work was progressing.

The visiting committee validates that the college has taken this recommendation seriously and significant efforts have been taken in the last six months to remedy most of the problems. While a significant effort has been initiated to address facilities problems, a great deal of work needs to be completed. The concern on disability access in some of the older buildings is still of concern and some additional attention may be needed by the college in addressing this problem.

16. *Actions to clarify its accreditation status and purpose with the ACCJC and the ACSCU.*

The March visiting team discovered a great deal of confusion about the status of the accreditation approvals for Brooks College. Accreditation had been obtained prior to the previous visit by ACICS to provide for four-year accreditation. When that accreditation was challenged by ACCJC, Brooks College had the accreditation changed to a secondary accreditation with the Department of Education. While it is not an active accreditation rating, the college has left it in place and is allowing the term to run out. Other efforts were made to seek accreditation with the Senior Commission of WASC, but no closure was reached on that status.

One of the compelling issues for Brooks College was to get four-year accreditation to qualify for Fashion and Interior Design programs (FIDER). The subject area accrediting agency is requiring all college accreditations to have access to four-year programs. Within two weeks of the progress visit, the FIDER accrediting agency re-accredited Brooks College accepting their two-year program. That accreditation will be in place for six years. Significant efforts have been made with several four-year institutions offering Interior Design degrees to articulate the Brooks program.

Work has begun in earnest on developing articulation agreements especially in interior design program and particularly with other private schools; conversations have also begun with CSULB (BFA in interior design). This is a significant change from the previous practice in this area.

The catalogs for Brooks College have all been modified to reflect the appropriate accreditation with ACCJC and references with other accrediting bodies have been removed. In discussions with students, faculty and administration, the visiting team did not find the evidence of confusion about the accreditation status among members of the college constituency.

Conclusion:

The Chair of the Progress Review visiting team spent time with the President and the representative from Career Education Corporation (CEC) to determine the status of the accreditation level being sought by the college. The current administration has reinforced its resolve to be accredited with ACCJC and to meet the standards of the Commission. The current effort to address FIDER accreditation has been resolved for the short-term. There will be a need in the future to address four-year accreditation status particularly for the Interior Design program. The college has indicated that this issue is set aside for the near future.

Further clarification was sought regarding the autonomy of Brooks College within the CEC. The purpose for this question was to determine that the Board of Directors of Brooks College meets the governance standards of ACCJC and that efforts of the administration to meet participatory governance efforts would not be undermined by the CEC. The discussion validated that the CEC is allowing the college to address its accreditation status in conformance with the ACCJC standards and this concern should be resolved.

The Commission may want to maintain a continuous review of the ongoing accreditation issues. While the college has indicated a commitment to ACCJC accreditation, It is the opinion of the visiting committee that the four-year accreditation issues have not been put to bed. However, the expectation of students, faculty, administration and the Board of Directors has changed significantly, and the college is making a sincere effort to meet the standards of ACCJC.

- A. Brooks College has taken steps to modify the college catalog and to provide training to admissions, financial aids staff, faculty, and the Associated Students organization to clarify that the institution is not offering a baccalaureate degree. To meet the needs of students more effectively that are seeking transfer to other colleges, Brooks College is seeking articulation agreements. Several of these agreements have been completed and these articulation agreements are outside of the CEC and its sister colleges. Work is being completed with advisors and others that work on educational plans with students to clarify goals and provide appropriate advice regarding transfer of credit. The statement about transfer of credit in the catalog is now appropriately stated.

Conclusion:

Brooks College has taken appropriate steps to address the concerns about student perceptions to obtain baccalaureate degrees. There was no evidence of the confusion by students observed in the March visit.

While the college has appropriately addressed the recommendation of the Commission, there is still a concern by the administration that they are going to eventually need four-year accreditation for the Interior Design students. The current accreditation status at a two-year level is approved for the next six years. At some time in the future the college may want to discuss a substantive change to offer a single four-year degree program through the ACCJC/ACSCU joint accreditation process.

B. Progress of the college in addressing the integrity of its relationship with students.

The previous reports on dealing with Recommendations 2, 5, 7 and 12 have described the efforts of Brooks College to address the integrity of its relationship with students. There are important steps that have been taken to resolve this issue.

- Efforts to activate the Associated Students organization on campus and include it in the participatory governance process are making good progress. The new President is working with the group and has obtained the students trust.
- The sub-committee structure to address the recommendations of the March visiting committee has included the active participation of students.
- The evidence of expectation for the college to lead to baccalaureate degrees has dissipated.
- Communications with students about grades, housing, financial aid and other issues in working with the staff have improved.

The college is working in the right direction and has indicated a desire to make the setting for its students effective in meeting the student career goals. This support for the students has never been in doubt by the visiting committee as it relates to the faculty.

Conclusion:

The college is making progress in meeting this commission concern. Steps have been taken in several areas including admissions, financial aid, housing, student participation in campus participatory governance, and communications to students regarding their rights. The visiting committee agrees that progress has been made in this area. The Commission should continue to monitor future complaints to determine if any reversals have taken place in current campus guidelines to deal with integrity in addressing student concerns.

C. The college must demonstrate that it operates with integrity in its relationship with the Commission.

The Commission reported concerns about the lack of consistency in which Brooks College was communicating with the Commission in maintaining the standards and eligibility requirements of the ACCJC. This relates to the concern of accreditation status, maintenance of a full-time President of the College, and governance relationships that relate to the autonomy of the college in its operations with the CEC.

The Chair of the visiting committee reviewed documentation and held conversations with the President and the representative of the CEC that participated in the review. It is the perception of the Chair that the representatives of Brooks are being sincere in their efforts to address the standards of ACCJC and to retain their accreditation status. Significant staffing changes have been made at the two campuses of the college and the leadership is now clearly defined. The new President is getting good perception by the constituent groups of the college and progress is being made on the short-term needs of the college.

Conclusion:

Brooks College is making an effort to address the standards and eligibility requirements of ACCJC. The new President is being given the space to provide leadership to address the Commission recommendations. Progress is being made on the short-term recommendations and the college is positioned to address the long-term program review, planning and budgeting process that need to be defined by the institution in its Educational Planning process.

The CEC is still getting negative press about its status with the Securities and Exchange Commission (SEC). This controversy does not appear to be affecting the operation of the college. In fact the time committed by the administration of CEC in dealing with the SEC may be providing space for Brooks College to deal with its internal needs to address Commission standards and eligibility requirements.

Vigilance is still necessary to ensure that the parent corporation (CEC) is providing Brooks College the autonomy that is required in the eligibility requirements related to campus governance. In the past reviews, the amount of control that the CEC maintained over the college in addressing the strategic planning process prevented the college from controlling its own destiny. At the current time, the CEC has backed off of enrollment targets and has dedicated resources to the college to address its accreditation status. The visiting committee hopes that this autonomy can be retained as Brooks College continues to address the ACCJC standards and address their own course of action in meeting student needs.