

**POTENTIAL BOARD EXTENSION OF  
ACCREDITATION TIMELINE REQUIRED FOR  
OPERATING AND DEGREE GRANTING AUTHORITY  
OF AN INDEPENDENT INSTITUTION**

**Submitted for:**

Action.

**Summary:**

This item recommends that American Islamic College be granted approval to extend the timeline for obtaining accreditation as required within five years of approval to operate granted to new institutions, subject to the institution's compliance with the IBHE proposed dates for obtaining candidacy status with the Higher Learning Commission by March 15, 2020 and accreditation by March 15, 2024.

**Action Requested:**

That the Illinois Board of Higher Education grant a limited extension of the institution's initial operating and degree granting authority in order for the institution to complete the accreditation process with the Higher Learning Commission

STATE OF ILLINOIS  
BOARD OF HIGHER EDUCATION

**POTENTIAL BOARD EXTENSION OF  
ACCREDITATION TIMELINE REQUIRED FOR  
OPERATING AND DEGREE GRANTING AUTHORITY  
OF AN INDEPENDENT INSTITUTION**

In 1979, the Illinois Board of Higher Education (IBHE) was assigned responsibility to administer “The Private College Act” (100 ILCS 1005/1 et. seq.) and “The Academic Degree Act” (110 ILCS 1010/1 et. seq.), two regulatory statutes governing the operation and degree-granting activity of private colleges and universities in the state of Illinois. Under these statutes and the rules to implement these statutes, postsecondary degree-granting institutions that were established after July 17, 1945, require approval from the IBHE to operate, and institutions established after 1961 require approval to operate and grant degrees.

In authorizing institutions to operate and grant degrees, the Board stipulates that approval is subject to maintenance of the conditions that were presented by the institution in its application and formed the basis upon which the specific authorizations were granted. The failure of an institution to maintain conditions of approval or conditions substantially equivalent to the conditions of approval, including failure to obtain accreditation from an accrediting authority recognized by the U.S. Department of Education or the Council for Higher Education Accreditation within five years, for a new institution, constitutes grounds for revocation of authorizations as defined in Sections 1030.30, 1030.70, and 1030.80 of the rules to administer the statutes. In the fifth year of operation the IBHE staff are required to conduct a review of the institution. In the event the institution has failed to achieve accreditation the Board may offer a limited extension (Section 1030.30(a)(16)).

## **Executive Summary**

### American Islamic College

The staff recommends adoption of the following resolutions:

*The Illinois Board of Higher Education hereby grants to American Islamic College a limited extension of its initial authorization to operate and grant degrees in order to obtain accreditation, subject to the institution's attainment of Candidacy status with the Higher Learning Commission by March 15, 2020 and accreditation by March 15, 2024.*

**American Islamic College**  
**640 W. Irving Park Road**  
**Chicago, IL 60613**  
**President: Mr. Daoud Stephen Casewit**

Limited Extension of initial authorization to operate and grant degrees in order to obtain candidacy status with the Higher Learning Commission by March 15, 2020 and accreditation by March 15, 2024.: Chicago Region

## **Background and History**

The following sections outline the College's history of operations in Illinois as these pertain to interactions with the Illinois Board of Higher Education. As of this report, American Islamic College appears to have stabilized in terms of institutional leadership with appropriate expertise for planning and managing the institution's academic operations.

American Islamic College (AIC, or the College) is a not-for-profit corporation that first received authority from the Illinois Board of Higher Education in November 1982 to operate as a postsecondary institution. In May 1984, the institution received degree-granting authorization for the Bachelor of Arts in Arabic Studies and the Bachelor of Arts in Islamic Studies, subject to the maintenance of the conditions under which authorization and approval were granted. In 1987, Illinois Board of Higher Education (IBHE or the Board) staff conducted a program review that revealed serious concerns about the College's then operations, including:

- A serious shortfall from original enrollment projections;
- A substantial reduction in the institution's financial support;
- A significant and rapid turnover of staff and faculty; and
- Internal administrative problems resulting from a lack of stability in the institution's governing and internal organizational structures.

As a result, IBHE staff at the time initiated proceedings to revoke operating and degree-granting authority for the institution. The Board revoked the institution's authority to operate and grant degrees on July 10, 1990. The revocation was based on the institution's failure to achieve and maintain conditions and standards under which its original authorizations were granted. The Board granted the College an opportunity to rectify the issues, but the institution elected not to contest revocation.

On March 21, 1991, Board staff sent a letter to American Islamic College indicating the institution was operating as a post-secondary institution in Illinois without authorization. On June 4, 1991, the College submitted applications for new operating and degree granting authorities, which was approved by the IBHE on November 26, 1991. The Board granted AIC authority to offer an Associate of Arts and a Bachelor of Arts in Arabic Studies, as well as a Bachelor of Arts in Islamic Studies. These authorizations were subject to the maintenance of the conditions set forth in the institution's 1991 applications for operating and degree authority and supplemental information provided as part of these applications. The institution's then stated mission was to provide a high-quality liberal arts education within the context of Islamic philosophy and culture. The College planned to enroll 41 degree students by its fifth year of operation, approximately ten of whom would be full-time, and an additional 34 unclassified students. The College further indicated that it would "move rapidly to regain candidacy status and then full accreditation from the North Central Association of Colleges and Schools."

In July 2002, three key members of the College resigned their positions, including the President and Vice President of the College, who served also as Treasurer and Secretary of the Board of Directors and as adjunct faculty. The College failed to inform the IBHE of this change in conditions, as is required by the Private College Act and the Academic Degree Act. Staff first learned of these resignations on October 16, 2002, by sworn statement of those members of the College who had resigned three months earlier. Under oath, these individuals also stated their joint opinion that the College's academic program had declined to a state of "almost non-existence" despite their "maximum and prolonged efforts."

An IBHE desk audit of data submitted by the College and information from other agencies indicated that the College failed in its mission to be a qualified degree-granting institution by failing to meet or maintain key conditions presented in the application for operating and degree authority that was approved by the Board in 1991 and by graduating almost no students. IBHE sent a letter to AIC, dated July 11, 2003, notifying the College it was subject to a "focused review." As of October 30, 2003, the institution's then website continued to identify as President, Vice President, and faculty for the college individuals who had resigned more than a year earlier. On October 30, 2003, IBHE staff directed technical questions to the institution seeking information concerning the current status of the College and its programs. The institution did not respond to this IBHE inquiry.

In 2004, information submitted by American Islamic College provided further evidence that the College had failed to maintain the conditions under which approvals to operate and to grant degrees were awarded in 1991. Certain annual reports and other materials submitted by the institution documented that it had graduated no students since 2000, had not attained its original enrollment projections, and had not applied for, nor received candidacy status nor full accreditation from the Higher Learning Commission (HLC). The College had also suffered a loss of key administrators, adjunct faculty, and members of its Board of Directors. In 2004, the IBHE once again revoked the authority of American Islamic College to operate and grant degrees.

On September 22, 2010, the IBHE sent a letter to the College's Chair of the Board of Trustees, noting that the institution appeared to be operating without authorization in violation of the Private College Act and the Academic Degree Act. The IBHE letter indicated that information had been drawn from a staff review of the institution's website. Among other activities, AIC was offering a variety of non-credit and non-degree classes that included history, Islamic studies, art, music, and Arabic and Turkish languages.

On January 24, 2011, American Islamic College, submitted an application to the IBHE for operating authority. Authority to operate and offer credit-bearing coursework was granted by the

Board on June 4, 2013. The College filed subsequent applications seeking degree-granting authority to offer the Bachelor of Arts in Islamic Studies (August 28, 2013), Master of Art in Islamic Studies (October 29, 2013), and Master of Divinity in Islamic Studies (May 20, 2014). Authorization to offer the Bachelor of Arts and Master of Arts in Islamic Studies was conferred by the Board on April 1, 2014. The IBHE approved AIC's application to offer the Master of Divinity in Islamic Studies on December 10, 2014.

Across these most recent applications to the IBHE, the College indicated its "goal of preparing qualified individuals for academic, and/or professional activities and careers in related fields." The applications materials submitted by College officials stated that the institution will be re-opened after significant reorganization and the installation of a reformed governance structure and a new administration. Further, the College leadership acknowledged that previous AIC administrations failed to meet critical mandates required of all institutions authorized to operate as colleges and universities in Illinois, including gaining and maintaining appropriate accreditation. "The present AIC administration remains fully cognizant of the admitted managerial and organizational weaknesses demonstrated by the prior leadership of the AIC [that resulted in]... AIC's earlier withdrawal from the Higher Learning Commission (HLC) 'Candidacy Status' in 1989 and its failure to apply to HLC between 1996-2004." In addition, in the application materials, College administrators assured that staff responsible for prior failures are no longer associated with the institution, and those who are currently charged with ensuring the delivery of high-quality higher education have developed and are committed to carrying out a "deliberate and well-reasoned plan for accreditation."

### **Accreditation**

*1030.30(a)(16): New institutions without accreditation from an accrediting authority recognized by the U.S. Department of Education or the Council for Higher Education Accreditation shall provide a clearly defined plan to move from candidate to affiliate status. The plan should include the name of the accrediting organization, the basic outline of the accreditation process, and the projected time line for obtaining affiliate status within five years after the date of Board approval, unless the Board waives the original time line because it is found to be an unrealistic expectation.*

After the 2013 and 2014 Board approvals granting American Islamic College authority to operate and grant degrees, IBHE staff have stayed in communication with College administrators about their progress toward seeking institutional accreditation. As noted in the May 2014 IBHE Board item for AIC's latest degree approval for the Master of Divinity in Islamic Studies, "staff have been in regular contact with senior institutional officials and have attended on-site meetings aimed at ensuring that the current incarnation of the institution continuously maintains conditions of approval. Because of its unique history, IBHE staff will continue close monitoring and AIC officials have committed to continuing cooperation."

In February 2016, IBHE staff requested the College provide an update on plans for obtaining accreditation. In this same communication, IBHE staff notified the College of its failure to disclose the institution's accreditation status, which was revealed through a review of the institution's website. The College was also instructed to post the IBHE website portal for filing complaints with the state agency on the institution's website, as well as in the AIC catalog and other promotional materials. In response to this February 2016 IBHE communication, the College submitted a written response, outlining its steps to address the issues raised by the IBHE and other key actions including preparation of a student handbook, faculty handbook, college catalog, and Board of Trustees manual. College administrators also outlined the steps taken to pursue

institutional accreditation. The institution noted that AIC was an affiliate member with the Association of Theological Schools, effective 2014.

Following a change in AIC leadership and the installation of a new president in August 2016, IBHE staff conducted a site visit to the College on December 12, 2016. In a post site visit communication, IBHE staff requested the College send a request to extend the five-year timeline for seeking accreditation. The institution submitted this request on February 8, 2017 in addition to other documents requested by staff including, AIC Accreditation timeline and steps; Plans for pursuing accreditation; Letter of Intent; Higher Learning Commission (HLC) acknowledgement of Letter of Intent; and Post interview letter.

In August 2017, IBHE staff contacted the President and the Vice President for Academic Affairs of the College to ascertain developments relative to the institution's efforts to seek accreditation. The College provided an update and informed IBHE that it was in the process of submitting its Eligibility Filing with the HLC and would submit a copy of the Good Faith and Planning to Achieve Accreditation and Plan for Accreditation documents required by HLC to the IBHE. On January 30, 2018, IBHE staff contacted AIC senior administrators requesting a progress update on plans for accreditation. In response, AIC provided that the College submitted its Eligibility Filing with the HLC and was awaiting response from the HLC on status. AIC also notified IBHE staff on February 28, 2018 that HLC approved the institution's Eligibility Filing and that the institution was ready to proceed toward candidacy status. It was also noted by the College that the next step in the accreditation process was to file a Letter of Intent to HLC to pursue candidacy status, which they planned to do after the institution's board provided anticipated approval in March 2018. In an effort to continue to closely monitor the accreditation plans of the institution, IBHE staff conducted a site visit at the institution on June 4, 2018. The timeline provided by the College included plans to achieve Candidacy status with HLC by spring 2019 and accreditation by fall 2019 or spring 2020.

On October 1, 2019, AIC leaders provided a status update to the IBHE on their efforts to obtain accreditation. The College hosted an HLC Visiting Peer Review Team in mid-April 2019. In early June, the College received the HLC Team's final report, which was followed by the HLC's Institutional Actions Council Hearing that resulted in the recommendation to grant Candidacy status to be finalized by the HLC Board of Trustees during a meeting to be held November 7 and 8, 2019. AIC President Daoud Casewit stated, "We expect to have a definitive of our status within ten days of their meeting, and feel fairly confident of a positive decision." In the response letter from IBHE, dated October 14, 2019 ("IBHE Response Letter"), staff requested that the College submit a formal request for extension of the original timeline for obtaining accreditation to the Board by October 25, 2019, along with current timeline and plans for obtaining affiliate status with, and potentially an accreditation determination from, the HLC; a current independently audited financial statement; and enrollment, retention, and graduation rates from 2013 to the present." Additionally, in the IBHE Response Letter, it was pointed out that the College website information on its accreditation status was misleading and needed to be corrected to state that "American Islamic College is not accredited." This correction to the AIC website was subsequently addressed by the College.

On October 24, 2019, the College submitted an updated request for an extension of the timeline for obtaining accreditation. The timeline provides plans to achieve Candidacy status with the Higher Learning Commission by March 2020 and initial accreditation by spring 2024. In addition to the letter of extension, AIC also submitted the following documents to IBHE per staff request: AIC Timeline and Steps for Accreditation; AIC Enrollment, Retention, Graduation Rates, 2013-2019; AIC Audited Financial Statement, Fiscal Year 2018-2019; and Supplementary AIC

Financial Narrative. The October 24, 2019 timeline requested by the College was reviewed by IBHE staff and deemed viable.

### **Student Outcomes**

*1030.30 (a)(3)(F): Success in student progression and graduation across all existing approved programs, and success rates in programs preparing students for certification and licensure, shall be consistent with expectations in higher education and the appropriate related field of study.*

AIC submitted enrollment, graduation, and retention rates data to IBHE on October 24, 2019. Total enrollments are as follows:

- 2018-19 – 19
- 2017-18 – 26
- 2016-17 – 40
- 2015-16 – 51
- 2014-15 – 41
- 2013-14 - 27

The retention rates for full-time, first-time, bachelor's degree-seeking cohort for 2013-2014 was 100 percent; 75 percent in 2014-2015; 50 percent in 2015-2016; and 67 percent in 2016-2017. Retention rates were not reported for 2017-2018 and 2018-2019 as there were zero prior year cohorts for those years. Graduation rates for full-time, first-time, bachelor's degree-seeking cohort were 67 percent for 2013-2014; zero percent for 2014-2015; and 50 percent for 2015-2016. Data provided for graduation rates are for graduation within four to six years. In sum, during the period 2013-2019, American Islamic College has graduated a total of eight students.

### **Finances**

*1030.30 (a)(11): The institution should be financially stable and capable of assuring the revenues needed for meeting stated objectives and fulfilling commitments to students.*

AIC submitted an audited financial statement for FY18-19 ending June 30, 2019 to the IBHE on October 24, 2019. The College's total liabilities and net assets for financial year end June 30, 2019 was in excess of \$2.4M. Note 5 of the audited financial statement indicates that AIC has entered into negotiations to sell the building it currently owns and uses for operation and will search for a new location for the College. In a supplemental financial narrative, AIC leadership indicated that the Board of Trustees approved the sale of its building on July 7, 2019 which is expected to generate revenue in excess of \$20M to be used to facilitate the transition to a new location for the school, development of new academic programs, and the establishment of an endowment. Additionally, AIC is in receipt of a \$1M grant from the Organization of Islamic Cooperation to meet short term financial needs.

### **Staff Conclusion**

The staff recommends that American Islamic College be granted a limited extension of its initial authorization to operate and grant degrees in order for the institution to obtain accreditation as required to continue to operate, subject to the institution's compliance with attaining Candidacy status with the Higher Learning Commission by March 15, 2020 and accreditation by March 15, 2024.