

APPROVED

DECEMBER 8, 2020

Item #F-4
December 8, 2020

**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 Instituto College be granted approval to extend the five-year timeline for obtaining institutional accreditation as required in its authority to operate as a new institution from April 7, 2015 to December 31, 2023 with the Accrediting Council for Continuing Education and Training.

Action Requested: That the Illinois Board of Higher Education approve the institution's request for an extension in the timeline to seek institutional accreditation with the Accrediting Council for Continuing Education and Training.



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. Any new institution that fails to obtain accreditation within five years after the date of Board approval, must request and receive Board waiver of the original timeline (Section 1030.30 (a) (16)).

Executive Summary

The staff recommends adoption of the following resolutions:

The Illinois Board of Higher Education hereby grants to Instituto College the request to extend the timeline for obtaining institutional accreditation as required within five years of approval to operate granted to new institutions, subject to the institution’s attainment of accreditation with the Accrediting Council for Continuing Education and Training by December 31, 2023.

Instituto College
2520 South Western
Chicago, IL 60608
Chief Executive Officer/President: Karina Ayala-Bermejo

Seeking Extension in the Timeline for Accreditation: Chicago Region

Background and History

Instituto College (Instituto or the College) is seeking an extension of the timeline for obtaining institutional accreditation from an accrediting authority recognized by the U.S. Department of Education or the Council for Higher Education Accreditation as required by 23 *Illinois Administrative Code* 1030.30(a)(16). This portion of the administrative rules for private colleges and universities requires institutions to seek and obtain accreditation within five years of IBHE approval to operate “unless the Board waives the original timeline because it is found to be an unrealistic expectation.” The following sections outline the College’s history of operations in Illinois as these pertain to interactions with the Illinois Board of Higher Education and form the basis of the recommendation to extend the timeline for achieving accreditation with the Accrediting Council for Continuing Education and Training by December 31, 2023.

Founded in 1977, Instituto del Progreso Latino is a nationally recognized education hub serving over 8,000 participants from across Cook County, Illinois, with a focus on low-income communities on the Southwest Side of Chicago. Instituto offers adult basic education, English Language Acquisition (ELA) classes, workforce development, career pathway programs, employment support, youth education, and wrap-around social services.

Prior to the existence of Instituto College, Instituto del Progreso Latino was initially authorized by the Illinois State Board of Education as a Private Business and Vocational Schools, and now is authorized under the Private Business and Vocational Schools Act, 2012 by the Illinois Board of Higher Education. The authorized programs include:

- Adult ESL
- Computer Technology Bridge Program
- Healthcare Bilingual Bridge Program
- Manufacturing Production and Operation
- Manufacturing Technology Bridge Program
- Networking
- Nursing LPN

Since 2005, Instituto’s Carreras en Salud (Careers in Health, abbreviated as Carreras) bridge pathway program has prepared hundreds of students to achieve English proficiency to be eligible for certain healthcare professions. Building on the success of Carreras and responding to alumni who wanted to continue their training and attain credentials as Certified Nursing Assistants, Instituto launched its first in-house Basic Nursing Assistant Training Program (BNATP) in 2016. Since then, Instituto has trained 12 cohorts of BNA students, with total enrollments of 290 students. Eighty percent of the students who have enrolled in the BNA program are students who have advanced from any of the Career Pathways classes. The BNA program pass rate for the Illinois Nurse Assistant/Aide Training Competency Evaluation Program for 2018 was 91.1 percent. Instituto’s

BNATP program which along with other Career Pathway programs Fifth Year Permit is currently under review by the Private Business and Vocational Schools unit of IBHE per the requirements of the Private Business and Vocational Schools Act of 2012, (105 ILCS 426).

With increasing numbers of participants in Instituto's healthcare career pathway programs who wanted to continue their training in-house and the rising acute shortage of bilingual, culturally competent health care professionals in Chicago and the six-county region, the former President and CEO of Instituto, Mr. Juan Salgado, and Vice President, Dr. Ricardo Estrada, submitted an application to IBHE to start a college. The mission of Instituto College is to provide an "enriched learning environment where students have the opportunity to earn practical credentials based on industry standards that enable them to develop their skills, become lifelong learners, and contribute to the overall vitality of their communities."

Instituto College registered as a not-for-profit corporation and received authority from IBHE on April 7, 2015, to operate as a postsecondary institution. On March 1, 2016, Instituto received degree-granting authorization for the following degrees:

- Associate of Applied Science in Healthcare Leadership;
- Associate of Applied Science in Manufacturing Management and Supervision;
- Associate of Applied Science in Manufacturing Production and Operations;
- Associate of Applied Science in Networking Technology;
- Associate of Applied Science in Nursing; and
- Associate of Applied Science in Organizational Leadership.

Since the inception of Instituto, the highest priority for program development was the Associate of Applied Science (AAS) in Nursing. The other five programs were never initiated, and no students were ever recruited for these programs. To focus Instituto's attention to its primary commitment to nursing education and to strengthen its capacity to fulfill accreditation requirements, Instituto submitted a request to voluntarily relinquish all the other five AAS degree programs. This request was accepted and confirmed by a letter from IBHE sent on January 17, 2020. Instituto retains IBHE approval to operate and grant the AAS in Nursing or more commonly known as an Associate Degree in Nursing program (ADN).

While the founders of the College were aware of the internal demand and the region's urgent shortage for nursing professionals, the process for launching a new nursing degree through the Illinois Department of Financial and Professional Regulation (IDFPR) and its Board of Nursing took longer than the administration planned. The approval process required for the nursing degree took two and half years. The approval process timeline was as follows:

- Feasibility Study Approval - November 2016
- ADN Curriculum Review/Approval – November 2017 submitted/March 2018 approved
- Board of Nursing Site Visit – July 16, 2018
- Site approval – July 16, 2018

After the site visit, Instituto was added to the Illinois Approved Nursing Education Program List and assigned a school code of US49410100.

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 timeline for obtaining affiliate status within five years after the date of Board approval, unless the Board waives the original timeline because it is found to be an unrealistic expectation.

After the Board approves granting Instituto College authority to operate and grant degrees, IBHE staff have stayed in communication with College administrators about Instituto's progress toward seeking institutional accreditation. After a series of correspondence and calls with IBHE's Senior Associate Director of Academic Affairs during early 2019, guidance on the requirements and timeline for issues related to accreditation was provided.

Additionally, on June 6, 2019, Dr. Stephanie Bernoteit conducted a site visit with Instituto's CEO, Dean of Academic Affairs, Interim Associate Dean of Nursing, and others. Dr. Bernoteit provided recommendations about the process of identifying an accreditation agency to evaluate Instituto and shared some contacts for institutions having recently completed accreditation.

In the initial Board application, Instituto planned to seek institutional accreditation with Accrediting Council for Independent Colleges and Schools (ACICS or the Council). However, on July 26, 2019, ACICS informed Instituto that ACICS would require a graduating class from the ADN program and Instituto's BNA program would not qualify for review due to the minimum number of clock hours required by the Council. These two factors along with the IDFP approval process would cause an even greater delay in achieving accreditation, so after additional research and discussion, the Accrediting Council for Continuing Education and Training (ACCET) was identified by Instituto. Additionally, on April 9, 2020, ACCET approved special consideration allowing Instituto to apply for initial accreditation before graduating students from the longest program, the Associate Degree in Nursing (ADN) program.

Initially, IBHE requested that Instituto provide an update on plans for obtaining accreditation by June 29, 2020 for review and then consideration by the full Board in August 2020. Due to COVID-19, IBHE extended the update to September 21, 2020 for the December 8, 2020 agenda. On September 21, 2020, the College submitted a formal request for an extension of the timeline for obtaining accreditation to December 2023. The proposed timeline provides adequate time to address the suspension and reduction of clinical sites due to COVID-19, delays in graduating Instituto's ADN students in December 2021, and other concerns identified in the Readiness Visit. ACCET's Executive Director explained that the Readiness Visit is conducted to better assess how "ready" the institution is in moving forward on the pathway towards accreditation. The projected timeline for ACCET accreditation follows one of three cycles, starting April, August, or December during each year. Any deficiencies identified would move the institution from the cycle to the next cycle. Instituto plans to achieve accreditation with the Accrediting Council for Continuing Education and Training by December 2023.

June 17, 2020	ACCET Initial Inquiry
July 2020	ACCET Accreditation Workshop
April 23, 2021	Application is Due
June 18, 2021	Application is reviewed for acceptance
August 20, 2021	Analytic Self-Evaluation Report Draft (ASER)
Sept. – Oct. 2021	ACCET Readiness Visit

Cycle 1

Nov. 5, 2021 -	ASER Final Due
Jan. - Feb. 2022	On-Site Evaluation
April 4-8, 2022	Commission Meeting/Hearing

Cycle 2

March 11, 2022-	ASER Final due
May - June 2022	On-Site Evaluation
August 1-5, 2022	Commission Meeting/Hearing

Cycle 3

July 8, 2022	ASER Final due
Sept. – Oct. 2022	On-Site Evaluation
Nov. 29 – Dec. 3, 2022	Commission Meeting/Hearing

In addition to the letter of extension, Instituto also submitted the following documents to IBHE per staff request:

Instituto’s Timeline and Steps for Accreditation; Enrollment and Retention Rates for 2019 and 2020 Cohorts; Instituto’s Audited Financial Statement, Fiscal Year ending 2019 was received and reviewed. The September 21, 2020 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.

Instituto submitted enrollment, graduation, and retention rates data to IBHE on September 21, 2020. Total enrollments are as follows:

- Cohort 1 – 2019 = 7
- Cohort 2 – 2020 = 15

The retention rates for full-time, first-time, degree-seeking cohort for 2019 is 57 percent, and the retention rates for full-time, first-time, degree-seeking cohort for 2020 is 93 percent. At this time, Instituto has not graduated any students enrolled in the ADN.

Facilities

Instituto has adequate facilities to administer this ADN Program. Instituto is housed in a building that has 37 instructional rooms including ten science labs and four computer labs. The College has two dedicated classrooms and access to a large conference room. Instituto has a dedicated Simulation Lab where nursing students can practice skills and procedures with all the equipment and supplies required by the IDFPR and the Illinois State Board of Nursing; in addition, mid-fidelity mannequins are available for such skills labs. The library is well-equipped with instructional materials with over 5,000 books and electronic resources. Students have access to several electronic databases (e.g., ERIC, WorldCat, ArticleFirst, Wilson Select, etc.) and assessment tools including ATI and Kaplan iHuman. The building is available for Instituto students in the evenings and during the weekends.

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.

Instituto submitted an audited financial statement for fiscal year ending June 30, 2020 to the IBHE on November 23, 2020. The auditor provided an unqualified opinion. The Instituto del Progreso Latino's net assets for financial year end June 30, 2020 were approximately \$14.7 million with a net income for the fiscal year of \$665,604. Note 15 of the audit report identified some potential going concern issues. These matters were related to the net loss for the prior years, ISHCA and IJLA (Instituto del Progreso Latino's charter schools) remained on financial remediation by the Chicago Public Schools, and a \$5,258,471 term loan for one of their buildings due to mature February 28, 2021. Management provided responses in the audit and to IBHE staff which addressed the auditor's note, including plans to refinance their loan. In addition, Instituto has provided a remediation plan to the Chicago Public Schools (CPS) coupled with quarterly financial reports. These measures are meeting the requirements of CPS, and the institution anticipates being removed from remediation status with CPS in the coming year.

As a response to the going concern noted in the audit, Instituto is required to provide the IBHE with ongoing communication about the status of their remediation plan with the Chicago Public Schools and the outcome of their efforts to refinance the term loan. Instituto will also provide updated quarterly financial statements through September 30, 2021, as well as an independently audited financial statement for the fiscal year ending June 30, 2021.

Staff Conclusion

The staff recommends that Instituto College be granted approval to extend the timeline for obtaining institutional accreditation as required within five years of approval to operate granted to new institutions, subject to the institution's compliance with attaining accreditation with the Accrediting Council for Continuing Education and Training by December 2023.