




Accrediting Commission of Career Schools and Colleges

2101 Wilson Boulevard, Suite 302
Arlington, Virginia 22201
703.247.4212
703.247.4533 fax
www.accsc.org

October 5, 2023

ELECTRONIC DELIVERY


Executive Director
Atlantis University
1011 Sunnybrook Rd.
Miami, Florida 33136

School #M072353
Warning

Dear Ms. Palacios:

At the August 2023 meeting, the Accrediting Commission of Career Schools and Colleges (“ACCSC” or “the Commission”) considered the Application for Renewal of Accreditation, Application for a Change of Location-Part I and Part II, new degree program applications, and the branch campus verification process submitted by Florida Palms University located in Miami, Florida, a branch campus of Atlantis University located in Miami Florida. Upon review of the June 7, 2023 On-site Evaluation Report (“OER”) and Florida Palms University’s July 7, 2023 response to that report, the Commission voted to place Atlantis University – as the main school – on Warning with a subsequent review scheduled for ACCSC’s February 2024 meeting.

ACCSC understands that Florida Palms University has since voluntarily withdrawn its ACCSC accreditation and is now closed.¹ Despite the voluntary withdrawal of accreditation and the subsequent closure of Florida Palms University, Atlantis University bears the responsibility for Florida Palms University’s compliance with accrediting standards and for the information submitted to the Commission in the OER response. Moreover, ACCSC is interested in the final disposition of the Florida Palms University students.

SUMMARY

Atlantis University submitted an Application for a Branch Campus-Part I in July 2020, proposing to establish a branch facility, UNIR International University, to be located in Miami, Florida. In December 2020, Atlantis University submitted the Application for a Branch Campus-Part II, signifying the branch had been established. ACCSC granted the new branch campus initial recognition of accreditation for a period of two years as a branch of the main school, Atlantis University effective February 12, 2021.

Effective January 31, 2022, UNIR International University changed its name to Florida Palms University. The school entered into the process of renewing accreditation by attending the March 2022 ACCSC Accreditation Workshop. In June 2022, the school added an associate and a baccalaureate degree in Business Administration. As of August 29, 2022, the school moved from its original location at 1444 Biscayne Boulevard to 1011 Sunnybrook Road, 11th Floor, Miami, Florida, into the same building occupied by the main school. The school characterized the move as temporary due to the fact that the current premises were going to be demolished.

The temporary nature of the move was important context for ACCSC’s recognition and approval of the change of location for the branch campus. By definition, a branch campus is a separate facility established

¹ See Florida Palms University’s August 14, 2023 notification of voluntary withdrawal and the follow-up emails dated August 17, 2023 between the school and ACCSC; the August 28, 2023 email from ACCSC requesting additional information and the school’s August 29, 2023 response; and the school’s notification of institutional closure dated September 8, 2023.

by a main school that is geographically apart from the main school (*Section IX (A)(1), Substantive Standards, Standards of Accreditation*). Given the exigencies created by the need to vacate the previous premises and the temporary nature of the co-location with the main school as described by Atlantis University and Florida Palms University, the Commission approved the change of location application with the explicit understanding that the school intended to move to a different, permanent location within 9 to 12 months.

In conjunction with Florida Palms University's Application for Renewal of Accreditation, ACCSC conducted an on-site evaluation to the branch campus on April 13-14, 2023. Based on a review of the June 7, 2023 OER, it appears that the school's managers were ill-prepared for the on-site evaluation. The school was unable to produce documentation and, in some cases, produced multiple versions of documents, which the on-site evaluation team found did not provide a definitive showing of compliance with accrediting standards in several areas. The questions raised in the OER include the co-location of Florida Palms University with the Atlantis University, the adequacy of the management team, faculty qualifications, tuition policies, and the accuracy of the catalog and advertising in representing the school's approved programs, admissions process, transfer of credit policies, educational delivery method, and name of the school.

At the August 2023 meeting, the Commission reviewed the OER and the school's response and found that in its estimation the response appears to contain several discrepancies and did not fully demonstrate compliance with certain accrediting standards over the term of Florida Palms University's operation.² The nature and content of the response created an impression that the branch was not adequately managed and called into question the accuracy of the records provided. On August 14, 2023 Florida Palms University notified ACCSC of the school's intent to voluntarily withdraw from ACCSC accreditation effective August 14, 2023. Despite the decision to voluntarily withdraw accreditation, questions remained regarding Atlantis University operation of an unaccredited branch campus. On September 8, 2023, Atlantis University notified ACCSC of the closure of Florida Palms University.

The voluntary withdrawal of the branch campus from ACCSC-accreditation and subsequent institutional closure, however, do not alleviate the Commission's concerns and questions pertaining to Florida Palms University's compliance with accrediting standards and the overall adequacy of the school's management. Further, it is not clear whether Atlantis University, as the main campus, provided adequate management and supervision of its branch campus during Florida Palms University's nearly three years of operation. In reviewing the record, the Commission raised questions as to whether Florida Palms University remained sufficiently attentive to the needs of students enrolled during the location transitions that occurred over the past year. Finally, the Commission found what appeared to be several discrepancies in the records submitted to ACCSC by Florida Palms University. A high level of reliance is placed upon information, data, and statements provided to the Commission by a school and as such the reliability of the records provided are critical to the process. This letter provides Atlantis University an opportunity to clarify the information submitted by Florida Palms University.

ACCSC's *Standards of Accreditation* requires adherence to accrediting standards by a main school's branch campus and that the main school bears responsibility for such compliance (*Section VIII (B)(1) Substantive*

² At its August 2023 meeting, the Commission determined that Florida Palms University's June 7, 2023 response to the OER did not satisfactorily address questions regarding management, faculty qualifications, recordkeeping, representation of the school through catalog and advertising, admissions procedures, leaves of absence, accepting transfer credit, cessation of program approval, and professional development. However, due to Florida Palms University's closure, the ratified action from the August 2023 meeting was not issued.

Standards, Standards of Accreditation). Accordingly, the Commission determined that Atlantis University must provide additional information demonstrating the proper closure of Florida Palms University as well as an explanation as to how the main school provided the necessary management and oversight of Florida Palms University and to what extent Atlantis University oversaw and was aware of the information, statements, and materials provided to the Commission by Florida Palms University throughout the accreditation process.

Commission Action

1. Although Florida Palms University voluntarily withdrew from ACCSC prior to deciding to close, given that it was a branch campus of a main school that remains accredited, the Commission expects Atlantis University to demonstrate that the school has fulfilled all obligations related to the closure of its former branch campus, Florida Palms University (*Section VII (O)(2), Rules of Process and Procedure, Standards of Accreditation*).

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

2. As the main school bears ultimate responsibility and accountability for its branch campus (*Section VIII (B)(1), substantive Standards, Standards of Accreditation*),³ Atlantis University must demonstrate that Florida Palms University was adequately managed in accordance with the requirements of *Section I, Substantive Standards, Standards of Accreditation*.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

3. Atlantis University must demonstrate that a high level of reliance can be placed upon the information, data, and statements provided to the Commission (*Introduction, Rules of Process and Procedure, Standards of Accreditation*).

[REDACTED]

³ A main school is responsible and accountable to the Commission for its separate facilities and is responsible and accountable for compliance with accrediting standards by its separate facilities. The main school bears ultimate responsibility for compliance with accrediting standards by its separate facilities.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Warning Restrictions

Pursuant to *Section VII (K)(8), Rules of Process and Procedure, Standards of Accreditation*, the Commission will not consider substantive changes, a change of location/relocation, or additions (i.e., separate facilities, new programs) to a school or its separate facilities while the school is under a Warning.

Notification to Students

The Commission requires the school to inform current and prospective students in writing that the school has been placed on Warning and to provide a summary of the reasons for the Warning Order (*Section VII (K)(7) Rules of Process and Procedure, Standards of Accreditation*).

Response Requirements

By applying for accreditation, a school accepts the obligation to demonstrate continuous compliance with the *Standards of Accreditation*. While the Commission employs its own methods to determine a school’s compliance with accrediting standards, the burden rests with the school to establish that it is meeting the standards. The Commission’s deliberations and decisions are made on the basis of the written record and thus a school must supply the Commission with complete documentation of the school’s compliance with accrediting standards.

Atlantis University must provide a response to the items expressed above that provides the information requested along with any additional information that the school believes supports a demonstration of compliance with accrediting standards.⁴ If the school’s response contains documentation that includes

⁴ Please reference [ACCSC Instructions for Electronic Submission](#) and the Blueprints for Success Series - [Preparing a Comprehensive Response for Commission Consideration](#) – which provide a framework for submitting a well-documented, organized, electronic response for Commission consideration. ACCSC encourages the school to review these modules when formulating its response to this letter. More information is available in the [Resources section](#) at www.accsc.org.

personal or confidential student or staff information that is not required for the Commission’s review (e.g., social security numbers, dates of birth, etc.), please remove or redact that information.

Atlantis University must upload the school’s electronic response directly to ACCSC’s College 360 Database. The ACCSC College 360 database can be accessed by [clicking here](#). Please note that the password utilized by the institution to access the Annual Report Portal is the same to access the School Submission section of the College 360 database. The Instructions for Electronic Submission can be found [here](#). A detailed overview on how to upload a school submission can be found [here](#).

Keep in mind, the school’s response must be prepared in accordance with ACCSC’s Instructions for Electronic Submission (e.g., prepared as one Portable Document Format (“PDF”) file that has been prepared using Adobe Acrobat software (version 8.0 or higher) and which has a .pdf extension as part of the file name). The school will receive an e-mail confirmation that the file has been received within 24 hours of the submission.

The school’s response must also include a signed certification attesting to the accuracy of the information and be received in the Commission’s office **on or before January 3, 2024**. If a response, the required fee,⁵ and the certificate of attesting to the accuracy of the information is not received in the Commission’s office **on or before January 3, 2024**, the Commission will consider further appropriate action.

For assistance with the password or for any other questions regarding the electronic submission requirements, please contact [REDACTED]. Please note that any password requests to access College 360 must be made by the school director, or designated member of the school’s management team, via e-mail.

For further assistance or additional information, please contact me directly a [REDACTED]

Sincerely,

[REDACTED]

Executive Director

⁵ ACCSC assesses a \$500 processing fee to a school placed on Warning.