



March 23, 2022

**VIA EMAIL**

[natalie.leonard@calbar.ca.gov](mailto:natalie.leonard@calbar.ca.gov)

Ms. Natalie Leonard  
Principal Program Analyst, Education Standards, Office of Admissions  
The State Bar of California  
180 Howard Street  
San Francisco, CA 94105

**Subject: Empire College/ACICS Accreditation Status**

Dear Ms. Leonard:

I am reaching out today as a follow up regarding email communications you had in February 2022 with Ms. Karly Zeigler, our Director of Accreditation regarding Empire College's ("Empire") Major Change application with the Committee of Bar Examiners ("CBE").

Empire College has a current grant of accreditation by ACICS through December 31, 2024 for its Master of Legal Studies ("MLS") program and is Title IV approved for that program.

ACICS has not yet received a response from its appeal to the US Secretary of Education regarding its ongoing status as a recognized accreditor. If the pending appeal to the Senior Department Official's decision to deny ACICS recognition is not granted, at that time ACICS, in consultation with the Department of Education (DOE), will provide specific instructions to all accredited institutions for transitioning their institutions to other Title IV accreditors and/or filing a teach-out plan for current students receiving Title IV loans, and upon completion of the teach-out plan, discontinuing academic operations. If an institution elects to file a teach-out plan, the plan must provide that all current Title IV students be provided an opportunity to complete the degree plans for which they are currently enrolled and receiving Title IV federal loan funds.

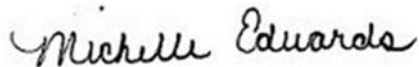
In our recent discussions with Empire and its counsel, we have been informed by Empire College that the asset transfer will involve the Juris Doctor program assets only, which has no impact on ACICS standards given that ACICS accredits the MLS program only. It is also our understanding that Empire plans to retain the assets necessary for students receiving Title IV aid to complete their MLS program. Empire has also informed us that a Campus Closure Application/Teach-Out Plan to teach out the MLS program utilizing current Empire curriculum, faculty, and facilities will be submitted after the asset

purchase agreement is executed by the parties. A teach-out plan submitted by Empire will be reviewed by ACICS and will include an "end date" and cessation of new enrollments as of the submission date. Should the institution choose to execute a teach-out agreement with another accredited institution, the signed agreement must be submitted to and approved by the Council prior to implementation. Empire has informed us that they intend to conduct their own orderly teach out of currently enrolled students, which may be assisted under Section 2-2-505 of the ACICS *Accreditation Criteria* that allows an institution to enter into a contract with an unaccredited institution or entity for the delivery of up to 25 percent of a program of study. Under that criterion, the institution must submit the contract to ACICS for review and approval prior to initiation.

During the teach-out plan, institutions continue to be monitored by ACICS, must maintain compliance with all applicable rules and regulations, and file all required reports and documentation in a timely manner. Any services agreement would need to comply with ACICS and DOE standards.

Please contact me via email or by phone at (202) 336-6845 if you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "Michelle Edwards".

Michelle Edwards  
President and CEO

c: Ms. Donna Hershkowitz, California Bar Examiners (donna.hershkowitz@calbar.ca.gov)  
Mr. Roy Hurd, Empire College (rhurd@empcol.edu)  
Ms. Karly Zeigler, ACICS (kzeigler@acics.org)