State Agencies for the Approval of Vocational and Nurse Education as appropriate, which are available at http://www.ed.gov/admins/finaid/accred/index.html.

Only written material submitted by the deadline to the email address listed in this notice, and in accordance with these instructions, become part of the official record concerning agencies scheduled for review and are considered by the Department and NACIQI in their deliberations.

A later <u>Federal Register</u> notice will describe how to register to provide oral comments at the Winter 2020 meeting regarding the recognition of a specific accrediting agency or State approval agency.

Electronic Access to this Document: The official version of this document is the document published in the Federal Register. Free Internet access to the official edition of the Federal Register and the Code of Federal Regulations is available via the Federal Digital System at: www.gpo.gov/fdsys. At this site you can view this document, as well as all other documents of this Department published in the Federal Register, in text or Adobe Portable Document Format (PDF). To use PDF, you must have Adobe Acrobat Reader, which is available free at the site. You may also access documents of the Department published in the Federal Register by using the article search feature at: www.federalregister.gov.

Specifically, through the advanced search feature at this site, you can limit your search to documents published by the Department.

Authority: 20 U.S.C. 1011c

Robert L. King
Assistant Secretary
for Postsecondary Education.

King, Robert

From: King, Robert

Sent: Thursday, January 16, 2020 11:35 AM

To: Jones, Diane
Cc: Hilsey, Shaina
Subject: FW: TRIAD

Attachments: TRIAD Guest List w State Authorizers 1.16 (002).xlsx

Diane: You requested a list of the State Authorizers who are attending the TRIAD meeting. Shaina was able to get the attached list from FSA, then highlight in green those who are attending the event. Bob

Robert L. King Assistant Secretary for Postsecondary Education U.S. Department of Education

From: Hilsey, Shaina <Shaina.Hilsey@ed.gov> **Sent:** Thursday, January 16, 2020 10:15 AM **To:** King, Robert <Robert.King@ed.gov>

Subject: TRIAD

Hi Bob,

Attached is the TRIAD meeting guest list with the State Authorizers highlighted as well as a copy of FSA's State Authorization Master List.

Best, Shaina Page 0254 Withheld pursuant to exemption (b)(5) of the Freedom of Information and Privacy Act Page 0255 Withheld pursuant to exemption (b)(5) of the Freedom of Information and Privacy Act

Bounds, Herman

From: Bounds, Herman

Sent: Thursday, March 12, 2020 3:20 PM

To: Brickman, Michael

Cc: Huston, John; King, Robert; Mahaffie, Lynn; Helton, Charity

Subject: Revised Accreditation Handbook

Attachments: UNOFFICIAL accreditationhandbook March 11 draft.docx

(b)(5)		

Herman Bounds Jr., Ed.S., MS.

Director

Accreditation Group

Office of Post Secondary Education

US Department of Education

400 Maryland Ave

Washington DC 20202

Herman.Bounds@ed.gov<mailto:Herman.Bounds@ed.gov>

202-453-7615

Page 0257 Withheld pursuant to exemption (b)(5) of the Freedom of Information and Privacy Act

(b)(6)		

Best,

John Huston
Office of Postsecondary Education
U.S. Department of Education
295-03 | 202.453.5772
John.Huston@ed.gov

Page 0259 Withheld pursuant to exemption (b)(5) of the Freedom of Information and Privacy Act Page 0260 Withheld pursuant to exemption (b)(5) of the Freedom of Information and Privacy Act

Bounds, Herman

From: Bounds, Herman

Sent: Wednesday, May 6, 2020 4:15 PM

To: Huston, John

Cc: King, Robert; Smith, George.Alan

Subject: FW: FN

Attachments: NACIQI.JULY 2020.NOTICE.02052020.PJS_.docx

(b)(6)

Herman Bounds Jr., Ed.S., MS.

Director

Accreditation Group

Office of Post Secondary Education

US Department of Education

400 Maryland Ave

Washington DC 20202

Herman.Bounds@ed.gov<mailto:Herman.Bounds@ed.gov>

202-453-7615

From: Bounds, Herman

Sent: Monday, March 2, 2020 1:14 PM

To: Smith, George.Alan <George.Smith@ed.gov>

Subject: FW: FN

Here you go

Herman Bounds Jr., Ed.S., MS.

Director

Accreditation Group

Office of Post Secondary Education

US Department of Education

400 Maryland Ave

Washington DC 20202

Herman.Bounds@ed.gov<mailto:Herman.Bounds@ed.gov>

202-453-7615

From: Cox, Jack < <u>Jack.Cox@ed.gov</u>>
Sent: Friday, February 28, 2020 9:34 AM

To: Akins, Karen < <u>Karen.Akins@ed.gov</u>>; Sanders, P.J. < <u>Phyllis.Jean.Sanders@ed.gov</u>> **Cc:** Bounds, Herman < <u>Herman.Bounds@ed.gov</u>>; Hilsey, Shaina < <u>Shaina.Hilsey@ed.gov</u>>

Subject: RE: FN

Hi Karen,

I just had Bob sign the latest version. Please let me know if this is still rejected.

Thanks, Jack

From: Akins, Karen < <u>Karen.Akins@ed.gov</u>> Sent: Friday, February 28, 2020 9:32 AM

To: Sanders, P.J. < Phyllis.Jean.Sanders@ed.gov>

Cc: Bounds, Herman < Herman.Bounds@ed.gov >; Cox, Jack < Jack.Cox@ed.gov >; Hilsey, Shaina

<Shaina.Hilsey@ed.gov>

Subject: FW: FN Importance: High

Hi... the OFR Tech Group advises that the document was not digitally signed? Wondering if Bob can try again to sign the notice with digital signature?

Thank You.... Karen

Karen Akins Committee Management Officer Office of the Secretary Office Phone: 202-401-3677

From: Akins, Karen

Sent: Friday, February 28, 2020 9:15 AM

To: Sanders, P.J. < Phyllis.Jean.Sanders@ed.gov>

Cc: Bounds, Herman < Herman.Bounds@ed.gov >; Cox, Jack < Jack.Cox@ed.gov >; Hilsey, Shaina

<Shaina.Hilsey@ed.gov>

Subject: RE: FN Importance: High

Hi P.J.

Unfortunately....the transmission failed....I have contacted the FR Office Tech Group....I received an error...advising the signature could not be verified?

Thank You... Karen

From: Sanders, P.J. < Phyllis.Jean.Sanders@ed.gov>

Sent: Friday, February 28, 2020 8:35 AM

To: Cox, Jack < <u>Jack.Cox@ed.gov</u>>; Hilsey, Shaina < <u>Shaina.Hilsey@ed.gov</u>>; Huston, John < <u>John.Huston@ed.gov</u>>;

Bounds, Herman Herman.Bounds@ed.gov; Akins, Karen Karen.Akins@ed.gov; Mahaffie, Lynn

<Lynn.Mahaffie@ed.gov>

Cc: Sanders, P.J. < Phyllis.Jean.Sanders@ed.gov>

Subject: FW: FN

All:

If at first you don't succeed. Keeping trying. This has been very trying! Let's try it again.

Please and thank you.

P.J.

From: Bounds, Herman < Herman.Bounds@ed.gov >

Sent: Friday, February 28, 2020 8:31 AM

To: Sanders, P.J. < Phyllis.Jean.Sanders@ed.gov>

Subject: FN

Here you go

Herman Bounds Jr., Ed.S., MS.

Director

Accreditation Group

Office of Post Secondary Education

US Department of Education

400 Maryland Ave

Washington DC 20202

Herman.Bounds@ed.gov<mailto:Herman.Bounds@ed.gov>

202-453-7615

Page 0264 Withheld pursuant to exemption (b)(5) of the Freedom of Information and Privacy Act Page 0265 Withheld pursuant to exemption (b)(5) of the Freedom of Information and Privacy Act

Bounds, Herman

From: Bounds, Herman

Sent: Tuesday, June 23, 2020 1:52 PM **To:** Huston, John; Daggett, Elizabeth

Cc: King, Robert

Subject: FW: Please see attached letter from Herman Bounds

Attachments: ACICS deferral notification letter.pdf

FYI

Herman Bounds Jr., Ed.S., MS.

Director

Accreditation Group

Office of Post Secondary Education

US Department of Education

400 Maryland Ave

Washington DC 20202

Herman.Bounds@ed.gov<mailto:Herman.Bounds@ed.gov>

202-453-7615

From: Sheffield, Cathy <Cathy.Sheffield@ed.gov>

Sent: Tuesday, June 23, 2020 1:49 PM

To: Michelle Edwards <medwards@acics.org>
Cc: Daggett, Elizabeth <Elizabeth.Daggett@ed.gov>
Subject: Please see attached letter from Herman Bounds

Dear Ms. Edwards

Please contact your staff analyst for a detailed explanation of the system errors in E-recognition, and the affected reports discussed in the attached letter.

Thank you
Cathy Sheffield
Staff Assistant
Accreditation Group
LBJ 270-12
202/453-7615

E-mail: cathy.sheffield@ed.gov

STATES OF ANIMA

UNITED STATES DEPARTMENT OF EDUCATION

OFFICE OF POSTSECONDARY EDUCATION

June 23, 2020

VIA EMAIL

Michelle Edwards, President	
Accrediting Council for Independ	ent Colleges and Schools
b)(6)	
Via email: (b)(6)	

Ms. Edwards:

We are writing to provide you with an update regarding the U.S. Department of Education ("Department") review of the Accrediting Council for Independent Colleges and Schools (herein referred to as "ACICS") December 20, 2019 monitoring report draft staff analysis dated April 30, 2020 ("Monitoring DSA").

On May 29, 2020, ACICS submitted its response to the Monitoring DSA to the Department. On May 30, 2020, Department staff became aware that, due to a system error in the e-Recognition system, ACICS had received and responded to an early draft version of the Monitoring DSA not intended for distribution, rather than the correct version of the DSA. In light of the system error regarding the Monitoring DSA, the Department will allow ACICS an additional 90 days from the date of this letter to further respond to the Monitoring DSA.

For these reasons, the Department has concluded that the review of the Monitoring DSA; the Reagan National University ("RNU") draft staff analysis dated April 28, 2020 and revised April 30, 2020 ("RNU DSA"); and the December 19, 2019 compliance report draft staff analysis dated April 30, 2020 ("Compliance DSA") will all be deferred to the February 2021 meeting of the National Advisory Committee on Institutional Quality and Integrity ("NACIQI"), in order to consolidate the review of ACICS' recognition at that time.

Ms. Edwards, President Accrediting Council for Independent Colleges and Schools June 23, 2020 Page 2

If you have any questions about this letter, please contact me at (202) 453-6128 or Herman.Bounds@ed.gov.

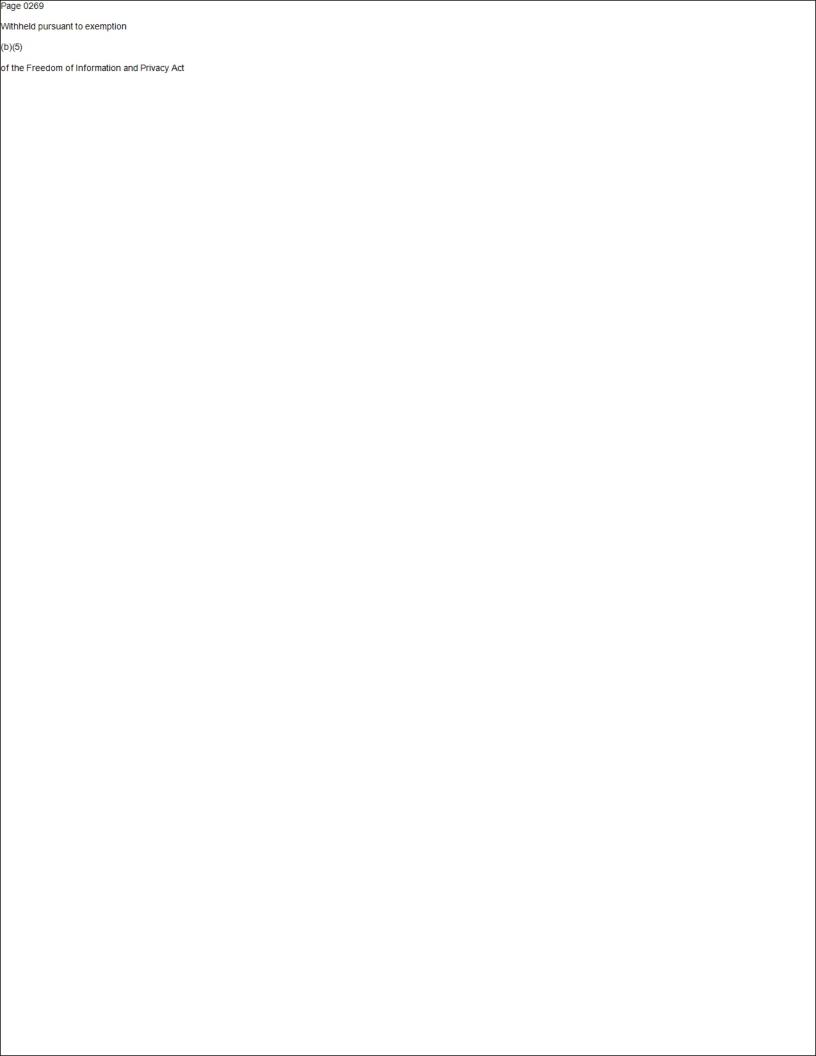
Sincerely,

Herman Bounds Digitally signed by Herman Bounds Date: 2020.06.23 10:50:26

-04'00'

Herman Bounds Jr., Ed.S., Director Accreditation Group

¹ 34 C.F.R. § 602.33 currently provides accreditation agencies at least 30 days to respond any draft staff analysis. This regulation will change on July 1, 2020, at which time accreditation agencies will be provided at least 90 days to respond to any draft staff analysis. Because the Monitoring DSA review will now extend beyond July 1, 2020, the Department is providing ACICS with 90 days to respond pursuant to the new regulation.



Page 0270 Withheld pursuant to exemption (b)(5) of the Freedom of Information and Privacy Act Page 0271 Withheld pursuant to exemption (b)(5) of the Freedom of Information and Privacy Act To: Sheffield, Cathy < Cathy.Sheffield@ed.gov>

Subject: Afternoon Update: Education Dept. Blames Accreditor for Dream Center's Collapse

Afternoon Update

Are you working remotely? Many institutions provide access to premium Chronicle content on campus. If your college or university is one of them, you can maintain that access when you're at home. Read this helpful <u>FAQ</u> to see how. Your account is easy to set up and will provide you access wherever you are.

GOVERNMENT

Ed Department Blames Accreditor for Dream Center's Collapse

By Eric Kelderman

A congressional inquiry said the Education Department had failed to protect students from two unaccredited for-profit colleges. But the department says it's the fault of an accreditor. (PREMIUM)



ADVICE

A Survival Guide for Black, Indigenous, and Other Women of Color in Academe

By Aisha S. Ahmad

How to protect your bright mind from the drain of everyday racism you may encounter in academic life.

EVENTS

How to Do Research During a Pandemic

Join us tomorrow to discuss strategies to support research continuity and data security, with the *Chronicle* reporter Francie Diep and a panel of experts.

NEWLY UPDATED

Here's a List of Colleges' Plans for Reopening in the Fall

By Chronicle Staff

Our searchable list, now with cumulative analysis, tracks whether institutions expect to have in-person or online-only classes or some mix of the two. Tell us what your campus is doing.

DATA

As Covid-19 Pummels Budgets, Colleges Are Resorting to Layoffs and Furloughs. Here's the Latest.

By Chronicle Staff

We've tallied at least 50,000 employees affected by layoffs or furloughs at colleges across the country. See the full list.

SPECIAL REPORTS

Coronavirus Hits Campus

As colleges and universities have struggled to devise policies to respond to the quickly evolving situation, here are links to *The Chronicle's* key coverage of how this worldwide health crisis is affecting campuses.

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The value of irrational beliefs

Interested in the role irrational beliefs play in our mental economy, Lisa Bortolotti, professor of philosopy at the University of Birmingham, argues that certain false beliefs can provide valuable services without harming others, resulting in useful epistemic outcomes.

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Innovation doesn't just happen in Silicon Valley

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How Will the Pandemic Change Higher Education?

We reached out to college staff members, professors, and administrators with a straightforward question: **How will the pandemic change higher education?**Order the collection to hear what they had to say. *Chronicle* subscribers:

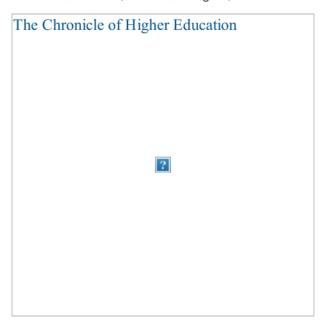
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King, Robert

From: King, Robert

Sent: Thursday, July 9, 2020 9:57 AM

To: Jones, Diane

Subject: FW: OIG Inspection I05T0010 Dream Center Education Holdings - OIG Observations

Attachments: Observation 5 - Authority of the Under Secretary.docx

(b)(5)

Robert L. King

Assistant Secretary for Postsecondary Education

U.S. Department of Education

From: Robinson, Lisa <Lisa.Robinson@ed.gov> Sent: Wednesday, July 8, 2020 1:40 PM To: Jones, Diane <Diane.Jones@ed.gov>

Cc: King, Robert < Robert.King@ed.gov>; Brown, Mark < Mark.Brown@ed.gov>; Magro, Tony < Tony.Magro@ed.gov>;

Whitman, Gary <GARY.WHITMAN@ed.gov>; Bernert, Gregory <Gregory.Bernert@ed.gov> **Subject:** OIG Inspection I05T0010 Dream Center Education Holdings - OIG Observations

Dear Ms. Jones,

The attached file describes an observation that we identified during our fieldwork. The purpose of sharing this with you now is to give you an opportunity to provide any additional documents and records that will help us ensure the completeness and accuracy of the facts presented in the observation.

Please provide a written response (an email or an attachment to an email) to the observation on or before July 17, 2020. In your written response, please indicate whether you agree or disagree with the facts as presented in the observation. Also, please include any documents and records that might not have been provided to us at the time of our fieldwork but could have a bearing on the completeness and accuracy of the facts discussed in the observation.

Please call me a r Greg Bernert at (b)(6) if you have any questions.

Lisa F. Robinson

Thank you,

Assistant Regional Inspector General for Audit U.S. Department of Education Office of Inspector General 1010 Walnut, Suite 410 Kansas City, MO 64106-2147

Office: 816-268-0519 Mobile: 816-500-1226 Email: lisa.robinson@ed.gov

Observation 5: Actions Taken That Were Outside the Delegated Authority of the Position

The Principal Deputy Under Secretary Delegated the Duties of the Under Secretary (Principal Deputy Under Secretary) for the Department approved and signed temporary provisional program participation agreements and approved the release of letter of credit funds to Dream Center schools. However, both those activities were delegated to and were the responsibility of the Chief Operating Officer of FSA, not the Under Secretary.

In June 2018, the Department agreed to allow Dream Center to use letter of credit funds that the Department was holding in escrow to pay for operational expenses at 13 schools (32 locations) that Dream Center planned to close by December 31, 2018. FSA and OGC drafted an addendum to each of the 13 school's temporary provisional program participation agreements. The addenda set the conditions for the use of the letter of credit funds. The Principal Deputy Under Secretary signed each of the 13 addenda to the temporary provisional program participation agreements schools on August 20, 2018.

In the addenda to the temporary provisional program participation agreements, the Department agreed to provide Dream Center up to \$50 million in letter of credit funds as reimbursement for operating expenses. The Department agreed to provide Dream Center an initial advance of no more than \$10 million and a supplemental advance of no more than \$7.5 million, contingent on Dream Center submitting and the Department reviewing records showing that the expenses were allowable under the terms of the addenda. After that, Dream Center could submit requests for reimbursement of no more than \$4 million every 14 days, for a total of no more than \$50 million. The Principal Deputy Under Secretary signed all documents authorizing the release of \$39.6 million in letter of credit funds to Dream Center. The Principal Deputy Under Secretary signed seven documents authorizing the release of letter of credit funds.

- August 24, 2018, (\$10 million)
- September 18, 2018, (\$4.4 million)
- October 2, 2018, (\$4 million)
- October 18, 2018, (\$4 million)
- November 21, 2018, (\$4 million)
- December 11, 2018, (\$9.2 million)
- December 27, 2018 (\$4 million)

Additionally, the Principal Deputy Under Secretary signed a January 8, 2019, memorandum authorizing the release of \$14.5 million in letter of credit funds back to Education Management Corporation.

Criteria

Section 141 of the Higher Education Act of 1965, as amended, established in the Department a performance-based organization responsible for delivery of Federal student financial assistance. The Secretary of Education maintained responsibility for developing policy and regulations relevant to the Title IV programs, while FSA was granted responsibility for the administration of the programs. The performance-based organization "shall be subject to the direction of the Secretary" but it "shall exercise independent control of its budget allocations and expenditures, personnel decisions and processes, procurements, and other administrative and management functions." The performance-based organization is to operate as a "discrete management unit responsible for managing the administrative and oversight functions supporting the programs authorized under Title IV" of the Higher Education Act of 1965, as amended.

In a May 2008 memorandum (Control Number EA/EN/59), the Secretary of Education delegated programmatic authority over the Title IV programs to the Chief Operating Officer of FSA. The delegation from the Secretary does not pass through either the Deputy Secretary or the Under Secretary.

According to Section 3.3 of FSA's Eligibility Procedures, temporary provisional program participation agreements and related addenda are signed and issued by the appropriate FSA School Participation Division Director or the School Eligibility Service Group Director. Section 4 of FSA's Financial Analysis Procedures describes the management of letters of credit, including collecting on the letters of credit and releasing funds back to the schools, as an operational function of FSA's School Participation Division.

McCullough, Carney

From: McCullough, Carney

Sent: Monday, March 6, 2017 5:09 PM

To: Morgan, Sally; Mahaffie, Lynn; Nevarez, Rafael; Wexler, Rob; Bounds, Herman;

Smith, Joseph; McLarnon, Gail

Cc: McLaughlin, Maureen; Frola, Michael; Siegel, Brian; Jenkins, Harold

Subject: RE: Request for guidance on restrictions online education for international in their

home country

From: Morgan, Sally

Sent: Monday, March 06, 2017 4:45 PM

To: Mahaffie, Lynn; Nevarez, Rafael; Wexler, Rob; Bounds, Herman; Smith, Joseph; McLarnon, Gail; McCullough, Carney

Cc: McLaughlin, Maureen; Frola, Michael; Siegel, Brian; Jenkins, Harold

Subject: RE: Request for guidance on restrictions online education for international in their home country

I	(b)(5)
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From: Mahaffie, Lynn

Sent: Thursday, March 02, 2017 5:51 PM

To: Nevarez, Rafael; Wexler, Rob; Morgan, Sally; Bounds, Herman; Smith, Joseph; McLarnon, Gail; McCullough, Carney

Cc: McLaughlin, Maureen; Frola, Michael

Subject: RE: Request for guidance on restrictions online education for international in their home country

Adding Gail and Carney.

From: Nevarez, Rafael

Sent: Thursday, March 02, 2017 5:42 PM

To: Wexler, Rob; Morgan, Sally; Mahaffie, Lynn; Bounds, Herman; Smith, Joseph

Cc: McLaughlin, Maureen; Frola, Michael

Subject: FW: Request for guidance on restrictions online education for international in their home country

Good afternoon all -

We received an interesting question from University of Arkansas at Little Rock (UA/LR) regarding ED regulations and cross-border distance education.

I've never seen this one before and it seems to potentially involve areas within the purview of OPE, FSA and OGC.

Assuming UA/LR wants to offer a new online graduate degree program that targets foreign students (i.e., physically located abroad), which ED regulations, if any, are pertinent to their proposed new course? (I presume UA/LR will also

need to address relevant requirements set by its accreditor, the Higher Learning Commission.)

Thanks for any input folks might have, and please feel free to loop in any additional folks who should be included.

Rafael

From: David Montague [mailto:drmontague@ualr.edu]

Sent: Thursday, March 02, 2017 4:58 PM

To: Nevarez, Rafael **Cc:** Thomas Lane Kelly

Subject: Request for guidance on restrictions online education for international in their home country

By way of introduction, my name is David Montague and my role at my university is to address logistics and policy for online education. We are one of the leaders within our state for distance teaching and learning, and our online program offerings are expanding.

I was given your email address as a possible contact to possibly answer or point us in the rights direction in terms of compliance with the U.S. Department of Education as we attempt to expand with one of our growing disciplines.

We at UA Little Rock are researching the feasibility of offering online classes for a Master's degree program and a Graduate Certificate program in Information Quality; targeted to students in Pakistan and India.

We are trying to gather any information about restrictions, laws or barriers associated with online education offered to residents of Pakistan and/or India while in their home country.

We have already checked with our internal and state stakeholders, but any possible guidance would be greatly appreciated. Thank you very much for your time.

David R. Montague, PhD |
Director of eLearning & Scholarly Technology and Resources |
University of Arkansas at Little Rock |
Professor of Criminal Justice |
drmontague@ualr.edu | ualr.edu/elearning

-

Lisa Noack

From: Lisa Noack

Sent: Tuesday, January 23, 2018 9:27 AM **To:** Frola, Michael; Bounds, Herman

Subject: HLC Action Letter for EDMC Institutions

Attachments: EDMC Action Letter 1-12-18.pdf

On January 9, 2018, the HLC Board of Trustees reaffirmed its approval of the Illinois Institute of Art's and the Art Institute of Colorado's application for Change of Control, Structure or Organization, wherein certain assets of Education Management Corporation (including the assets of the Institutes) are acquired by Dream Center Education Holdings and related intermediaries, which was conditioned on the parties closing the transaction in mid-January 2018. The Action Letter detailing this reaffirmation is attached. HLC received notification that the transaction closing occurred on January 20, 2018, with the institutions having accepted all conditions stated in the Board's November 2017 Action Letter, as reiterated by the attached.

Best regards,

Lisa

Lisa Noack Assistant to the President & Board Higher Learning Commission 230 South LaSalle Street, Suite 7-500 Chicago, IL 60604-1411

Voice: (312) 263-0456 x.108 / Fax: (312) 263-3565

E-mail: lnoack@hlcommission.org

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January 12, 2018

VIA ELECTRONIC MAIL

Elden Monday, Interim President The Art Institute of Colorado 1200 Lincoln St. Denver, CO 80203

Josh Pond, President Illinois Institute of Art 350 N. Orleans St. Suite 136 Chicago, IL 60654

Brent Richardson Chief Executive Officer Dream Center Education Holdings, LLC 7135 East Camelback Road Phoenix, AZ 85251

Dear President Monday, President Pond, and Mr. Richardson:

This letter is formal notification of action taken by the Higher Learning Commission ("HLC" or "the Commission") Board of Trustees ("the Board") concerning Illinois Institute of Art ("IIA") and the Art Institute of Colorado ("AIC") ("the Institutes" or "the institutions," collectively). Through action taken via mail ballot on January 9, 2018, the Board voted to reaffirm the extension of status related to its approval of the institutions' application for Change of Control, Structure, or Organization wherein the Dream Center Foundation ("DCF"), through Dream Center Education Holdings LLC ("DCEH" or "the buyers") and related intermediaries, acquires certain assets currently held by Education Management Corporation ("EDMC"), including the assets of the Institutes.

In taking this action, the institutions are subject to the same terms and requirements outlined in the Board's original action letter issued in November 2017, with the sole exception of the following non-substantive modification:

The institutions submit an interim report every 90 days following the date of the consummation of the transaction until their next comprehensive evaluations on the following topics:

• ..

 Quarterly financials, to include a balance sheet and cash flow statement for DCF, DCEH and each institution, as a means to ensure adequate operating resources at each entity and at the institutions will be provided within 45 days of the close of the quarter" (added emphasis highlights the modification).

In addition, it should be noted that any required reporting will include Dream Center Education Holdings and Dream Center Education Management but will not include any specific institutions accredited by other institutional accreditors.

As you know, this approval is specifically subject to a Change of Control Candidacy, which is effective immediately upon the closing of the transaction. Commission policy INST.B.30.020, Obligations of Affiliation, states that an institution "portrays its accreditation status with the Commission clearly to the public." Under this policy, the Commission anticipates that the institutions have properly notified their students of the acceptance of the Board's condition of Change of Control Candidacy and have clearly stated its impact on current and prospective students once the transaction closes. Similarly, the Commission expects that the institutions have also provided proper advisement and accommodations to students in light of this action, which may include, if necessary, assisting students with financial accommodations or transfer if they so request. I ask that you please provide copies of all disclosures and notifications related to the institutions' acceptance of Change of Control Candidacy to the HLC Staff Liaison for the institutions, Dr. Anthea Sweeney.

Please send the Commission written notice of the closing date within 24 hours after the transaction has closed. Once confirmation of the transaction closing is received, the institutions will enter Change of Control Candidacy status, which will be effective on the date of the close of the transaction, and the Commission will issue a Public Disclosure Notice and provide copies of this action letter to the various external entities identified on this letter. As a reminder, any public announcement by the buyers about this action must include the information that any approval provided by the Commission was subject to the condition of the buyers accepting Change of Control Candidacy status for not less than six months up to a maximum of four years, and that the buyers have accepted the condition.

You are also obligated to notify the Commission prior to closing if any of the material terms of this transaction have changed or appear likely to change. By Commission policy the closing must take place within no more than thirty days from the date of the Board's approval. If there is any delay such that the transaction cannot close within this time frame, you must notify the Commission as soon as possible.

Commission policy COMM.A.10.010, Commission Public Notices and Statements, requires that HLC prepare a summary of actions to be sent to appropriate state and federal agencies and accrediting associations and published on its website within thirty days of any action. The summary will include HLC Board action regarding the Institutes.

On behalf of the Board of Trustees, I thank you and your associates for your cooperation. Please contact Dr. Sweeney if you have questions about any of the information in this letter.

Sincerely,			
(b)(6)			

Barbara Gellman-Danley President

Chair of the Board of Trustees, Illinois Institute of Art Chair of the Board of Trustees, Art Institute of Colorado Deann Grossi, Director of Institutional Effectiveness, Illinois Institute of Art Ben Yohe, Director of General Education, the Art Institute of Colorado Diane Duffy, Interim Executive Director, Colorado Department of Higher Education Stephanie Bernoteit, Senior Associate Director, Academic Affairs, Illinois Board of Higher Education

Evaluation team members

Anthea Sweeney, Vice President for Accreditation Relations, Higher Learning Commission

Karen Peterson Solinski, Vice President for Legal and Governmental Affairs, Higher Learning Commission

Michael Frola, Division Director, Multi-Regional and Foreign Schools Participation Division, U.S. Department of Education

Herman Bounds, Director, Accreditation Group, U.S. Department of Education

Frola, Michael

From: Frola, Michael

Sent: Tuesday, January 23, 2018 9:44 AM

To: Lisa Noack; Bounds, Herman

Subject: RE: HLC Action Letter for EDMC Institutions

Hi Lisa.

I'm confirming receipt of your email and attachment.

Thanks, Mike

Michael Frola

Director

Multi-Regional and Foreign School Participation Division

Office: (202) 377-3364 michael.frola@ed.gov StudentAid.gov



PROUD SPONSOR of the AMERICAN MIND

From: Lisa Noack [mailto:lnoack@hlcommission.org]

Sent: Tuesday, January 23, 2018 9:27 AM **To:** Frola, Michael; Bounds, Herman

Subject: HLC Action Letter for EDMC Institutions

On January 9, 2018, the HLC Board of Trustees reaffirmed its approval of the Illinois Institute of Art's and the Art Institute of Colorado's application for Change of Control, Structure or Organization, wherein certain assets of Education Management Corporation (including the assets of the Institutes) are acquired by Dream Center Education Holdings and related intermediaries, which was conditioned on the parties closing the transaction in mid-January 2018. The Action Letter detailing this reaffirmation is attached. HLC received notification that the transaction closing occurred on January 20, 2018, with the institutions having accepted all conditions stated in the Board's November 2017 Action Letter, as reiterated by the attached.

Best regards,

Lisa

Lisa Noack
Assistant to the President & Board
Higher Learning Commission
230 South LaSalle Street, Suite 7-500

Chicago, IL 60604-1411

Voice: (312) 263-0456 x.108 / Fax: (312) 263-3565

E-mail: Inoack@hlcommission.org

dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please resend it to the sender and delete the original message and copy of it from your computer system. Opinions, conclusions and other information in this message that do not relate to our official business should be understood as neither given nor endorsed by the organization.

Frola, Michael

From: Frola, Michael

Sent: Monday, March 5, 2018 8:52 AM

To: Sikora, Tara; Mangold, Donna; Arthur, Julie; Smith, Joseph (Joseph.Smith@ed.gov);

Finley, Steve (Steve.Finley@ed.gov); Dossa, Shein (Shein.Dossa@ed.gov); Allred,

Michelle (Michelle.Allred@ed.gov)

Cc: Bennett, Ron; Minor, Robin (Robin.Minor@ed.gov); Bounds, Herman

Subject: Higher Learning Commission - Karen Peterson (nee: Solinski)

Attachments: K Peterson Conflict of Interest Correspondence.msg

Heads up: Something is going on at HLC.

I spoke with Karen Peterson (nee Solinski) last Thursday and she was pretty upset. Karen said (b)(6)
(b)(6) and that was reason she could not meet with us to discuss the EDMC candidacy status issue.

Karen said it had to do with her Conflict of Interest Correspondence email she sent regarding Grand Canyon (see attached).

This morning I got this auto email response below when I cancelled the meeting with HLC per this request from Anthea Sweeney from HLC:

Good Morning Mr. Frola,

Unfortunately, due to unforeseen circumstances, the phone call you arranged for this afternoon at 1:30 p.m. Central will need to be rescheduled. I will reach out to you with some options for an alternative time soon. So sorry for the inconvenience.

Thank you.

Anthea M. Sweeney, Ed.D.
Vice President for Legal and Governmental Affairs
Higher Learning Commission
230 South LaSalle Street, Suite 7-500
Chicago, IL 60604

Main Tel.: 800-621-7440
Direct Line: (b)(6)
Fax: (b)(6)

-Mike

From: Karen L. Peterson [mailto (b)(6) hlcommission.org]

Sent: Monday, March 05, 2018 8:40 AM

To: Frola, Michael

Subject: Automatic reply: Dream Center Discussion with HLC

Thank you for contacting the Higher Learning Commission (HLC). Karen L. Peterson is no longer employed with HLC.

To ensure your email is properly received, please contact the appropriate staff member below:

Anthea Sweeney, Vice President for Legal & Governmental Affairs
0)(6)
Zach Waymer, Manager for Legal & Governmental Affairs, State Relations, & Institutional Complaints (b)(6)
State Authorities/Offices, HLC Policies, Institutional Complaints.
Cecilia Torres, Manager for Legal & Governmental Affairs, Federal Relations
Federal Authorities/Offices, Federal Compliance, Third-Party Comments.
Robert Rucker, Research & Advocacy Coordinator for Legal & Governmental Affairs
(b)(6)
Other Accreditors, Change of Control, Structure or Organization, Sanctions, Special Monitoring.

Other Accreditors, Change of Control, Structure or Organization, Sanctions, Special Monitoring.

The information contained in this communication is confidential and intended only for the use of the recipient named above, and may be legally privileged and exempt from disclosure under applicable law. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please resend it to the sender and delete the original message and copy of it from your computer system. Opinions, conclusions and other information in this message that do not relate to our official business should be understood as neither given nor endorsed by the organization.

Karen L. Peterson

From: Karen L. Peterson

Sent: Wednesday, February 21, 2018 12:09 AM

To: Barbara Gellman-Danley

Cc: Linnea Stenson; Samuel D. Kerr; Robert Rucker; Frola, Michael; sfinley@ed.gov; Brian

Mueller; Jennifer Lech; Dan Bachus; smeyer@gcu.edu; broberts@gcu.edu; Hank

Radda

Subject: K Peterson Conflict of Interest Correspondence

Attachments: K Peterson Ltr to Pres Barbara GellmanDanley Re GCU Conflict of Int 2-19-18.pdf

All,

Please see enclosed correspondence.

Best regards,

Karen Peterson

Executive Vice President for Legal and Governmental Affairs

HLC

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February 19, 2018

VIA ELECTRONIC MAIL

Dr. Barbara Gellman-Danley President Higher Learning Commission 230 South LaSalle Street, Suite 7-500 Chicago, IL 60604-1411

Dear President Gellman-Danley:

I am writing to memorialize our conversation on Thursday, August 3, 2017. In that conversation, I explained that I would need to recuse myself from reviewing any aspect of any forthcoming transaction related to Grand Canyon University ("GCU"). As you may recall I indicated that I had a friendship with a GCU senior staff member that may prevent my being an objective, rigorous and impartial reviewer on behalf of the Commission. I outlined measures I had identified to assure that any such review was conducted appropriately and rigorously for the Commission.

In particular, I identified a peer reviewer, Mr. Sam Kerr, who has extensive experience as a Commission peer reviewer and lawyer, now partially retired and in private practice with Lynn, Jackson, Schultz, and Lebrun, PC, in Rapid City, South Dakota to take on my role in any such review. He had recently agreed to take on an adjunct staff role in Legal & Governmental Affairs. I noted that he would, in keeping with our regular practice in such reviews, work with the staff liaison, Dr. Linnea Stenson, Vice President for Accreditation Relations, to conduct the analysis of the transaction against the five Change of Control Factors and produce documentation of the analysis as per usual. (I had previously informed Dr. Stenson of this conflict of interest on May 22, 2017 prior to scheduled meetings with Western International University in Phoenix.) The Board of Trustees would receive this documentation, along with any institutional response and a copy of the preacquisition review letter produced by the U.S. Department of Education as required by Commission policy changes effective in February 2017 that required the institution under review to produce such documentation when the pre-acquisition was required by the terms of the transaction, which it would most likely have been in this and similar transactions. As required by the Commission policy on Change of Control, Structure or Organization, the Board of Trustees would continue to make the final decision in this case.

With your consent, I subsequently met with Mr. Kerr in Pittsburgh on August 22, 2017 prior to our conducting the Fact-Finding Visit for the transaction in which the Dream Center Foundation acquired certain assets of Education Management Corporation (EDMC). Mr. Kerr agreed to accept the assignment and work with Dr. Stenson to conduct the review. I advised Mr. Kerr that he and Dr. Stenson might consider abbreviating some aspects of the Fact-Finding Visit process as the current Change of Control review was an extension of the previous review conducted in Fall 2015 in which a full Fact-Finding Visit was conducted with limited findings about the institution's current compliance with the Criteria for Accreditation, and GCU had subsequently undergone a full comprehensive evaluation in December 2016 with no findings. However, I advised Mr. Kerr that he and Dr. Stenson should make the final determination about whether a more limited desk review, as allowed by the Change of Control policy, would be appropriate

President Barbara Gellman-Danley Higher Learning Commission February 19, 2018 Page two

in light of the extensive evaluation conducted by the Commission of the institution within the past three years.

I further formally notified Dr. Brian Mueller, President of GCU and Dr. Jennifer Lech, Senior Vice President for Academic Affairs and University Registrar and the Commission Accreditation Liaison Officer for GCU with copies to Dr. Stenson and Mr. Robert Rucker of my recusal. I asked all parties not to copy me on any further internal or external correspondence related to this matter. Dr. Lech acknowledged my e-mail on November 26, 2017. To my knowledge I have received no such correspondence subsequent to that date. I have attached a copy of that e-mail thread.

I have had no further formal involvement in this case.

The Shared Services Guidelines were produced by ad hoc committee of the Commission Board of Trustees for which I provided staff input and direction based on my experience with transactions involving these structures. I have enclosed a copy of the letter provided to President Mueller explaining the new guidelines and on which I am copied concluding my involvement in their production and application.

Sincerely,	
(b)(6)	

Karen L. Peterson Executive Vice President, Higher Learning Commission

Enclosures

cc:

Mr. Steve Finley, Associate General Counsel, Office of General Counsel, U.S. Department of Education Mr. Michael Frola, Director, Multi-Regional and Foreign School Participation Division, U.S. Department of Education

Dr. Linnea Stenson, Vice President for Accreditation Relations, and Director/AQIP Pathway, Higher Learning Commission

Mr. Sam Kerr, Adjunct Staff Member, Legal & Governmental Affairs, and Partner, Lynn, Jackson, Schultz and Lebrun

Mr. Robert Rucker, Research Associate, Legal & Governmental Affairs, Higher Learning Commission

Ms. Sarah Byrne, Human Resources Director, Higher Learning Commission

Dr. Brian Mueller, President, Grand Canyon University

Dr. Jennifer Lech, Senior Vice President of Academic Affairs/University Registrar, Grand Canyon University

Mr. Dan Bachus, Chief Financial Officer, Grand Canyon University

Dr. Stan Meyer, Chief Operating Officer, Grand Canyon University

Mr. Brian Roberts, General Counsel, Grand Canyon University

Dr. Hank Radda, Provost, Grand Canyon University

President Barbara Gellman-Danley Higher Learning Commission February 19, 2018 Page two

Re: HLC Letter to Grand Canyon University

Jennifer Lech (6)(6) @gcu.edu>
Sun 11/26/2017 10:21 AM
To:Karen Solinski < (b)(6) hlcommission.org>; Robert Rucker < rrucker@hlcommission.org>; Brian Mueller < Brian.Mueller@gcu.edu>;
Cc:Linnea Stenson < lstenson@hlcommission.org>; Sam Kerr < samdkerr@rap.midco.net>;
Happy holidays to you all as well. Got it! Sam reached out to Dan, and we are working on materials based on that conversation. I'll c.c everyone else, and drop you off any emails going forward.
Sam, if you need anything, please feel free to let me know.
Happy holidays, Karentalk to you later.
Sent from my T-Mobile 4G LTE Device
Original message From: Karen Solinski (b)(6) hlcommission.org> Date: 11/26/17 9:10 AM (GMT-07:00) To: Robert Rucker <rrucker@hlcommission.org>, Brian Mueller <brian.mueller@gcu.edu> Cc: Linnea Stenson <lstenson@hlcommission.org>, Sam Kerr <samdkerr@rap.midco.net>, Jennifer Lech <jennifer.lech@gcu.edu> Subject: Re: HLC Letter to Grand Canyon University</jennifer.lech@gcu.edu></samdkerr@rap.midco.net></lstenson@hlcommission.org></brian.mueller@gcu.edu></rrucker@hlcommission.org>

Thanks, Robert.

Hi Jen, Sam will be doing the heavy lifting on this one, and he will keep me posted as appropriate. He has been an invaluable adjunct staff member for LGA this year and has given me some breathing room. (And who said HLC doesn't understand adjuncts...) So Sam will be your primary contact. Of course, Linnea is in for the long haul, and Robert keeps the whole process moving. So keep them copied as appropriate, please, and you can drop me off this circuit and the ones to come.

Hope your holiday has been tremendous. I hear Phoenix provided a warm holiday welcome for all the out-of-towners.... You still have a few holiday hours left so you should be enjoying them! Best,

Karen

From: Robert Rucker

Sent: Friday, November 17, 2017 2:06:40 PM

To: (b)(6) @gcu.edu

Cc: Karen Solinski; Linnea Stenson; Sam Kerr; jennifer.lech@gcu.edu

Subject: HLC Letter to Grand Canyon University

1 of 2

President Mueller,

Please see the attached letter from HLC President Barbara Gellman-Danley regarding the University's application for Change of Control, Structure or Organization.

Thank you.

Sincerely,

Robert Rucker

Robert Rucker

Research and Advocacy Coordinator for Legal and Governmental Affairs
Higher Learning Commission
rrucker@hlcommission.org | 800.621.7440 ext. 164

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This message is private and confidential. If you have received it in error, please notify the sender and remove it from your system.

Mueller 1 of 1



November 17, 2017

VIA ELECTRONIC MAIL

Brian Mueller, President Grand Canyon University 3300 W. Camelback Rd. Phoenix, AZ 85017

Dear President Mueller:

At its meeting on November 2-3, 2017, the Higher Learning Commission ("HLC" or "the Commission") Board of Trustees ("the Board") endorsed new guidelines related to the determination and evaluation of shared services arrangements. The purpose of these guidelines is to provide a general framework for how HLC will evaluate such arrangements against the Criteria for Accreditation and Assumed Practices during a routine comprehensive evaluation, or as part of an application for Change of Control, Structure or Organization. The framework provided in the guidelines is effective immediately and will be applied to all future and outstanding reviews that involve shared services arrangements.

Grand Canyon University ("the University") has a pending application for Change of Control, Structure or Organization that involves one or more shared services arrangements. As you are aware, HLC notified you on July 7, 2017, that the Board would be working over the summer to develop these guidelines and that the guidelines would be used in the evaluation of shared service arrangements in your application. Commission staff will temporarily suspend review of the application to provide the University an opportunity to examine and respond to these guidelines.

The University should review the guidelines and determine whether it wishes to submit revisions and/or supplemental information to its application for Change of Control, Structure or Organization. A copy of the guidelines is enclosed for your convenience. Any information must be received by HLC within 30 days of the date of this letter, or no later than December 18, 2017. Please submit information to the Commission in accordance with the enclosed *Document and Submission Guidelines*. As a general note, while these guidelines are being provide for your review, they have not yet been published on HLC's website.

Following the 30-day period, HLC will resume review of the University's application. The Commission will consider any new information provided by the University in response to the guidelines during this process. The University should anticipate receiving the Summary Report and any related attachments in early January 2018. Consideration of the application and any supplemental information remains tentatively scheduled for the February 2018 HLC Board meeting.

Thank you for your cooperation. If you have additional questions, please contact your HLC Staff Liaison, Dr. Linnea Stenson.

Sincere	ely,		
(b)(6)			

Barbara Gellman-Danley President

Enc: Shared Services Arrangements Guidelines
Document and Submission Guidelines

Cc: Jennifer Lech, Senior Vice President of Academic Affairs and University Registrar, Grand Canyon University

Sam Kerr, Adjunct Staff, Higher Learning Commission

Linnea Stenson, Vice President for Accreditation Relations and Director of the AQIP Pathway, Higher Learning Commission

Karen Peterson, Solinski, Executive Vice President for Legal and Governmental Affairs, Higher Learning Commission





SHARED SERVICES ARRANGEMENTS

Guidelines for Institutions and Peer Reviewers

Introduction

The following information provides guidance to institutions and peer reviewers in determining and evaluating shared services arrangements involving institutions accredited by HLC. These guidelines explain the Criteria for Accreditation that will be primarily considered when shared services arrangements are evaluated. These guidelines were endorsed by HLC's Board of Trustees in November 2017.

In addition, the following information provides an overview of the review process for applications for Change of Control, Structure or Organization that include a shared services arrangement. Institutions should review HLC's policy <u>INST.B.20.040</u>, <u>Change of Control Structure</u>, or <u>Organization</u>, and the <u>Change of Control, Structure or Organization Procedure</u>.

Note: HLC's processes regarding the outsourcing of academics are addressed in HLC's Substantive Change processes regarding contractual and consortial arrangements. More information is available at <a href="https://linear.nlm.nih.gov/h

Background of Shared Services Arrangements Subject to HLC Oversight

HLC adopted the policy on Change of Control, Structure or Organization in June 2009. This policy establishes that HLC oversight extends beyond transactions involving a merger or transfer of assets to other transactions that affect the structure or function of an institution, and that such transactions may require HLC approval. This policy also applies to certain transactions involving a shared services arrangement that require HLC approval.

A shared services relationship is a type of arrangement, typically governed by an agreement or contract, that seeks to shift certain operating functions and/or services of an institution of higher education, to another entity. That other entity may be a corporation legally affiliated with, or related to, the accredited institution, or the entity may be independent. A shared services arrangement, in certain instances, may be considered a form of outsourcing and need not be reciprocal. Shared services relationships may occur through a variety of different arrangements.

The **formation** or **renewal** of the following shared services arrangements must be reported to HLC, and some arrangements may require formal approval through HLC's Change of Control, Structure or Organization procedure. (Note: This procedure is being separately updated to reflect this guidance.) Effective November 3, 2017, an institution is expected to report to HLC that it intends to initiate or renew such a relationship, and should provide documentation as outlined in the Change of Control, Structure or Organization procedure (the institution must submit an executable version of the services agreement). HLC will review the submission to determine whether the proposed relationship affects the organization or functionality of the institution such that it requires a full review and approval under HLC's Change of Control, Structure or Organization policy.

The following include, but is not limited to, types of agreements that may require HLC approval:

- 1. The institution forms a relationship with an entity that has no corporate or financial relationship with the institution to perform certain services. An example would be an agreement wherein an institution outsources multiple aspects of its operations to a single provider of higher education services. HLC will determine whether any formal approvals are required based on the documentation's description of the services being provided by the services provider.
- 2. The institution works with other related accredited institutions to pool or consolidate services into another related entity that may be another corporation or may be a division of one of the institutions. An example would be a state university system with several accredited institutions that consolidates at the flagship institution certain operations that previously were provided locally at each campus.² HLC will determine whether any approvals are required based on the documentation's description of the structure of the entity and the services provided.
- 3. The institution has a parent or affiliated corporation that provides various services to the institution. A variant of this situation would be when an institution purchases the assets of or merges with another accredited institution that has an existing relationship with a parent or affiliated corporation, and the relationship with the parent or affiliated entity is being maintained after the purchase through a shared service relationship with the former parent or affiliated corporation.
- 4. The institution forms a new related or separate corporation into which the institution transfers some of its existing operations and/or services. This new corporation would then provide services to the accredited institution. Alternatively, the institution may transfer assets related to academics and student services into the new related or separate corporation, and the institution may become the services corporation. (This new service corporation may also sell its services to other institutions with which it had no previous relationship.)

Relevant Criteria for Accreditation and Assumed Practices

While any agreement is expected to conform to all HLC standards, the following Core Components from the Criteria for Accreditation are primarily considered regarding shared services arrangements.

Core Component 1.A.: The institution's mission is broadly understood within the institution and guides its operations.

Core Component 1.D.: The institution's mission demonstrates commitment to the public good.

Core Component 2.A.: The institution operates with integrity in its financial, academic, personnel, and auxiliary functions; it establishes and follows policies and processes for fair and ethical behavior on the part of its governing board, administration, faculty, and staff.

Core Component 2.B.: The institution presents itself clearly and completely to its students and to the public with

regard to its programs, requirements, faculty and staff, costs to students, control, and accreditation relationships.

Core Component 2.C.: the governing board of the institution is sufficiently autonomous to make decisions in the best interest of the institution and to assure its integrity.

- 1. The governing board's deliberations reflect priorities to preserve and enhance the institution.
- The governing board reviews and considers the reasonable and relevant interests of the institution's internal and external constituencies during its decision-making deliberations.
- 3. The governing board preserves its independence from undue influence on the part of donors, elected officials, ownership interests, or other external parties when such influence would not be in the best interest of the institution.
- 4. The governing board delegates day-today management of the institution to the administration and expects the faculty to oversee academic matters.

¹ Note that HLC has a separate policy on the development of contractual relationships related to sharing of academic programs related to the teaching and learning process. These guidelines do not apply to contractual relationships referenced in policy INST.F.20.040.

² Note that HLC has a separate policy on the development of consortial relationships related to sharing of academic programs related to the teaching and learning process. These guidelines do not apply to consortial relationships referenced in policy INST.F.20.040.

Core Component 3.C.: The institution provides support for student learning and effective teaching.

Core Component 4.A.: The institution demonstrates responsibility for the quality of its educational programs.

Core Component 5.B.: The institution's governance and administrative structures promote effective leadership and support collaborative processes that enable the institution to fulfill its mission.

Core Component 5.C.: The institution engages in systematic and integrated planning.

Core Component 5.D.: The institution works systematically to improve its performance.

Quality Assurance Expectations in Shared Services Arrangements

The following guidelines explain the Criteria as it pertains to shared service arrangements being reviewed through Change of Control, Structure or Organization or at the time of a comprehensive evaluation. Where the guidelines have implications for certain Assumed Practices, those Assumed Practices are identified.

Mission

The institution must be able to demonstrate that the implementation of a shared services relationship is in alignment with its mission and that the shared services provider assists in fulfillment of that mission. Ultimately, the institution remains responsible for assuring its mission is fulfilled. (1.A.)

In a scenario where the shared services relationship derives from a parent or affiliated corporation that owns or has a legal relationship with the institution, the institution must demonstrate that its educational responsibilities, including revenue allocations, take primacy over contributing to a related or parent organization. (1.D.)

Integrity: Ethical and Responsible Conduct

The institution must be able to demonstrate that the shared services provider possesses the same high level of integrity and ethics as the institution with respect to the services it is providing in the shared services arrangement; its history with other similar services arrangements is also relevant in this consideration. Furthermore, the shared services provider must also have established policies and processes for fair and ethical behavior or agree explicitly in the contract with the institution to abide by the institution's ethics standards, at least regarding its work related to this relationship. A shared services provider's policies and processes will not differ significantly or be in direct conflict with that of the institution.

In addition, the institution must demonstrate accountability and transparency with regard to the shared services relationship and its impact on the institution and its students. The institution should show that it has engaged in a thorough process to review and vet the shared services provider, which may mean, as appropriate, that there has been an RFP process or that the institution has otherwise ensured that the shared services provider has a proven record of good conduct in its business dealings and is providing its services at fair market value. The institution should also show that there was broad campus involvement as appropriate for the function in selecting the shared services provider and finalizing the terms of the agreement.

Within the agreement, there should be a provision allowing the institution to terminate the agreement upon reasonable notice with or without cause. Further, the agreement should have provisions allowing the parties to the agreement to engage in a process to mitigate any issues regarding performance. The institution must also have a process to review any complaints from faculty or students about the shared services provider's fulfillment of its services, and such a process must be in alignment with the institution's established complaint policies and procedures. Finally, the payment arrangements for services provided by the shared services provider should be clearly stated in the agreement or in documents supporting the agreement.

The institution should demonstrate that it has updated its conflict of interest policies to alert institutional representatives when they might have a conflict of interest related to the shared services relationship.

Finally, the president of the institution will provide a statement to HLC when the contract or agreement for the services is finalized, assuring the institution's accountability for the actions of the services provider related to its fulfillment of the agreement. (2.A. See also Assumed Practice A.4, A.5., and A.10.)

The institution must demonstrate that it has publicly disclosed its relationship with the shared services provider; such statements may be general in nature and posted on the institution's website. The statements may not need to be provided in each interaction between the shared services provider and students.

If the shared services agreement allows the shared services provider to use the trademarks and other intellectual property ("IP") of the institution, the public disclosure of the relationship, as noted above, should indicate that the institution's trademarks and IP may be used by the shared services provider pursuant to a licensing agreement. (2.B.)

If representatives of the shared services provider, other than administrators noted under Core Component 5.B., will have a position on the governing board of the institution or in any other governance function, the institution must demonstrate that those representatives are in an advisory role only to the duly-elected or appointed members of the governing board or any related management committees. These representatives' inclusion on the board in an advisory capacity must be approved by a majority of the independent governing board members.

With such representatives, the governing board must be sufficiently autonomous such that its decisions reflect the best interest of the institution as a whole. The institution must have conflict of interest policies to guide the board of the institution, particularly when it is voting on issues related to the shared services relationship or shared services provider. (2.C.)

Teaching and Learning: Quality, Resources and Support

The institution must demonstrate that any student support or faculty development offered by the shared services provider is provided under quality control standards set by the institution (see Core Component 5.A.) and is comparable to such services provided to students and faculty by the institution outside of its relationship with the shared services provider. If the shared services provider is hiring or providing student support personnel, they must meet the same or superior qualifications as such personnel hired directly by the institution. (3.C.)

Teaching and Learning: Evaluation and Improvement

The institution must demonstrate that its instructors have an active and substantive role in the design of any curriculum developed through the relationship with the shared services provider and that instructors have a continued role in overseeing and conducting academic program review of any program developed in conjunction with the shared services provider or with which the shared services provider is engaged. If the shared services provider is hiring or providing instructors for the institution, those instructors must meet the same or superior qualifications, including academic credentials and work experience, as faculty members hired directly by the institution. The institution must also demonstrate that its academic affairs office is setting admission and graduation requirements that apply to all students including those students in academic programs in which the shared services provider has a role. (4.A.)

Resources, Planning and Institutional Effectiveness

The institution must demonstrate that it retains oversight of a shared services provider in order to ensure the effective provision of services. The institution's oversight includes the following activities:

- 1. The institution must demonstrate that its governing board has reviewed the formational documents of the shared services arrangement and any documents that address the ongoing relationship between the institution and the shared services provider and has received appropriate legal and financial advice prior to executing the agreement or contract. The institution must also demonstrate that it retains its ability to set and revise acceptable performance standards for the services provided by the shared services provider. The institution should be able to demonstrate that its board has set such performance standards and has a process under the shared services agreement to revise them as needed.
- 2. The institution must retain sufficient leadership within its organizational structure to oversee the functions that have been transferred or outsourced to the shared services provider. For example, if the institution has transferred marketing to the shared services provider, the institution must have

- appropriate personnel to provide oversight of that function for the institution; the institution may determine how best to provide this oversight.
- 3. If the shared services provider is a corporation affiliated with the institution or recently formed by the institution, and the institution transferred its own resources and personnel to that corporation, the shared services provider and the institution may have overlapping senior executive leadership who may have voting or non-voting positions on the institution's board. This arrangement is appropriate provided that a majority of the board of each organization is independent and decisions with respect to the appointment, hiring and retention of any overlapping executives are made by a majority of the independent directors of each institution. However, if the shared services provider takes on other significant business interests with other institutions, its interest and that of the original institution might diverge. At that time, the institution's board is expected to review the situation and determine whether there is a conflict of interest that requires the implementation of any appropriate mitigating controls. (See also Assumed Practice D.6.)
- The institution must demonstrate that it has appropriate policies and processes to audit or review on a regular basis the performance of the shared services provider. Alternatively, its agreement with the shared services provider must require the shared services provider to audit itself regularly. In either case, the results of these performance audit processes must be regularly reported and available to the institution and used in its quality improvement processes. Such performance audit functions may be strengthened by the use of a third-party auditor or reviewer that conducts the performance reviews. These processes must include a separate feedback mechanism from students receiving these services. The audit processes and service standards in the shared services agreement will demonstrate that there exist robust processes through which the institution can require changes in the services provided under the agreement or even terminate the arrangement, as noted elsewhere in this document. Finally, any shared services agreement should provide that any performance

standards or related provisions satisfy all applicable state and federal statutes and regulations. The results of these regular performance audits should be available to HLC on request. (5.B.)

The institution must be able to demonstrate that its planning extends to the services included in a shared services agreement and takes into account the role of the shared services provider in the life of the institution. Both the institution and the shared services provider must be able to demonstrate that they are systematically and routinely assessing the provision of all services as well as the developing and changing needs of the institution and how the services provider will respond to such changes. (5.C.)

The institution must demonstrate that the shared services provider works systematically to improve its performance in the arrangement at the same level expected of the institution and that the institution has data related to the services relationship or its performance under the services agreement. (5.D.)

HLC's Review of Shared Services Arrangements

The initiation or renewal of some shared service relationships will require HLC approval through HLC's Change of Control, Structure or Organization policy and procedure.

In addition, all ongoing shared services relationships must be disclosed to HLC during a comprehensive evaluation. Whenever HLC evaluates such a relationship within a comprehensive evaluation, the standards for determining ongoing quality are the Criteria for Accreditation and the guidelines specified in this document.

Such relationships should be listed in the appropriate section of the Federal Compliance Filing, and a copy of the agreement should be provided as an attachment to the filing. (Note: The Federal Compliance Packet for institutions will be updated for 2018–19 to provide further instructions and will include some questions relative to these guidelines.)

An HLC peer review team will take into consideration such relationships as a general part of its review in the same manner it takes into account other details related to an institution's operations. For example, if an institution's online program has been created or advanced based on such a relationship, this relationship will be considered by an evaluation team during a regular visit evaluating the quality of the institution's operations and academics, including its distance learning program, based on the Criteria for Accreditation.

Evaluating Relevant Materials

As part of the review process, HLC will look for certain key documents in evaluating the relationship: the letter, agreement, contract or other document outlining the relationship, and the policies and procedures of the institution, as well as those of the shared services provider related to its work for the HLC-accredited institution.

In addition, if the formation of the relationship is being evaluated through Change of Control, Structure, or Organization, HLC will also review the formation documents and other items identified in the related HLC procedure. While it is important that the contract or agreement be fair to both the institution and the shared services provider and contain appropriate clauses related to the fee structure, indemnification, renewal, termination and related provisions, HLC will primarily focus its attention in determining quality and institutional oversight on those areas identified in these guidelines. The contract or agreement will be considered as ancillary to that process.³ (See also Assumed Practice A.10.)

Evaluating Academic Functions and Performance Finally, the institution must demonstrate that it maintains the ultimate control over functions related to academics even if not directly part of the teaching and learning process such as admission policies, graduation requirements and academic content of the program. The institution must demonstrate that it conducts a performance audit, on a regular basis, of the services provided by the shared services provider to ensure that the shared services provider meets certain agreed-upon performance standards.

3 For example, the presence of a clause in the agreement allowing the institution to terminate the relationship has been used by institutions to demonstrate oversight of the relationship. While as a general matter, a termination clause is an important item in most agreements, its presence does not necessarily establish a pattern of oversight by the institution.

During the Change of Control, Structure or Organization process, HLC will look to the contract and related documents to ensure that it is clear that the institution has control over these functions and that the performance audit process has been established and is ready to be implemented should HLC approve the extension of accreditation following consummation of the agreement. During the review, HLC staff members or peer reviewers may also, at HLC's discretion, interview personnel from the shared services provider and review the shared services provider's internal protocols for assuring quality in this relationship and in general.

After the relationship has been implemented and during subsequent comprehensive evaluations or through its regular monitoring processes, HLC will review the performance audit reports being generated by the institution and may interview the shared services provider as appropriate to assure quality.

Conclusion

This document is subject to review and endorsement by HLC's Board of Trustees. It will be periodically updated to reflect developing good practice in this area, as HLC and institutions become more familiar with how such relationships work to serve students, the institution, and the common good.

Institutions should contact their HLC staff liaison early in the process of developing such a relationship to ensure that any approval, if necessary, is secured prior to execution of any shared services arrangement.

Questions?

Contact the institution's HLC staff liaison or HLC's Legal and Governmental Affairs.



Document and Submission Guidelines

for Legal and Governmental Affairs

Document Guidelines

All documents must be submitted in PDF format. Unless otherwise instructed, all documents within the submission should be individually bookmarked and named. The submission should also be indexed, made searchable, and should include internal links across the individual documents, as needed.

Documents should not contain links to external websites or files.

Document Submission

Institutions should submit all materials electronically. Do not submit hard copies of materials or provide a separate email containing the materials to HLC unless directed to do so by HLC.

Upload the file to: https://www.hightail.com/u/HLC-LGA

In the subject line, please include the institution name and the subject of the item being uploaded (e.g., "Neverland University - Change of Control Application" or "Neverland University - Notice Report").

After selecting submit, allow the file to finish uploading before closing the browser window. The system will provide confirmation that the file uploaded and was sent to HLC. Staff will provide a separate acknowledgement of receipt of the file upon request.

Frola, Michael

From: Frola, Michael

Sent: Monday, March 5, 2018 10:52 AM

To: Finley, Steve; Sikora, Tara; Mangold, Donna; Arthur, Julie; Smith, Joseph; Dossa,

Shein; Allred, Michelle

Cc: Bennett, Ron; Minor, Robin; Bounds, Herman

Subject: RE: Higher Learning Commission - Karen Peterson (nee: Solinski)

(b)(5)

I'm hoping we can reschedule a meeting soon.

- Robin, Ron, and Herman.

From: Finley, Steve

Sent: Monday, March 05, 2018 10:43 AM

To: Frola, Michael; Sikora, Tara; Mangold, Donna; Arthur, Julie; Smith, Joseph; Dossa, Shein; Allred, Michelle

Cc: Bennett, Ron; Minor, Robin; Bounds, Herman

Subject: RE: Higher Learning Commission - Karen Peterson (nee: Solinski)

Thanks Mike.

The attachments to the letter includes HLC's guidelines that were adopted in November 2017 to evaluate shared services agreements. The correspondence shows that HLC gave the new guidelines to DCF/EDMC to review, and allowed them to modify or supplement the application with HLC to address those guidelines.

(b)(5)

From: Frola, Michael

Sent: Monday, March 05, 2018 8:52 AM

To: Sikora, Tara; Mangold, Donna; Arthur, Julie; Smith, Joseph; Finley, Steve; Dossa, Shein; Allred, Michelle

Cc: Bennett, Ron; Minor, Robin; Bounds, Herman

Subject: Higher Learning Commission - Karen Peterson (nee: Solinski)

Heads up: Something is going on at HLC.

I spoke with Karen Peterson (nee Solinski) last Thursday and she was pretty upset. Karen said (b)(6)

and that was reason she could not meet with us to discuss the EDMC candidacy status issue.

Karen said it had to do with her Conflict of Interest Correspondence email she sent regarding Grand Canyon (see attached).

This morning I got this auto email response below when I cancelled the meeting with HLC per this request from Anthea Sweeney from HLC:

Good Morning Mr. Frola,

Unfortunately, due to unforeseen circumstances, the phone call you arranged for this afternoon at 1:30 p.m. Central will need to be rescheduled. I will reach out to you with some options for an alternative time soon. So sorry for the inconvenience.

Thank you.

Anthea M. Sweeney, Ed.D. Vice President for Legal and Governmental Affairs Higher Learning Commission 230 South LaSalle Street, Suite 7-500 Chicago, IL 60604

Main Tel.: 800-621-7440 Direct Line: 312-881-8128

Fax: 312-263-7462

-Mike

From: Karen L. Peterson [mailto (b)(6) n@hlcommission.org]

Sent: Monday, March 05, 2018 8:40 AM

To: Frola, Michael

Subject: Automatic reply: Dream Center Discussion with HLC

Thank you for contacting the Higher Learning Commission (HLC). Karen L. Peterson is no longer employed with HLC.

To ensure your email is properly received, please contact the appropriate staff member below:

Anthea Sweeney, Vice President for Legal & Governmental Affairs asweeney@hlcommission.org

312.881.8128

Zach Waymer, Manager for Legal & Governmental Affairs, State Relations, & Institutional Complaints zwaymer@hlcommission.org

312.476.1348

State Authorities/Offices, HLC Policies, Institutional Complaints.

Cecilia Torres, Manager for Legal & Governmental Affairs, Federal Relations ctorres@hlcommission.org

312.263.0456, ext. 125

Federal Authorities/Offices, Federal Compliance, Third-Party Comments.

Robert Rucker, Research & Advocacy Coordinator for Legal & Governmental Affairs rrucker@hlcommission.org

312.236.0456, ext. 164

Other Accreditors, Change of Control, Structure or Organization, Sanctions, Special Monitoring.

The information contained in this communication is confidential and intended only for the use of the recipient named above, and may be legally privileged and exempt from disclosure under applicable law. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please resend it to the sender and delete the original message and copy of it from your computer system. Opinions, conclusions and other information in this message that do not relate to our official business should be understood as neither given nor endorsed by the organization.

Frola, Michael

From: Frola, Michael

Sent: Tuesday, June 5, 2018 2:27 PM

To: Holland, Linda; Smith, Kathleen; Minor, Robin; Bennett, Ron; Menashi, Steven; Finley,

Steve; Jones, Diane; Mangold, Donna; Johnson, Wayne; O'Brien, Marianna; Frola,

Michael

Subject: RE: Dream Center Meeting - INTERNAL DELIBERATIVE WORK COPY

Attachments: Dream Center Potential Closures Report 6.5.xlsx

Please see attached updated Dream Center report.

Thanks, Mike

Michael Frola

Director

Multi-Regional and Foreign School Participation Division

Office: (202) 377-3364 michael.frola@ed.gov StudentAid.gov



PROUD SPONSOR of the AMERICAN MIND

From: Holland, Linda

Sent: Tuesday, June 05, 2018 9:35 AM

To: Smith, Kathleen; Minor, Robin; Frola, Michael; Bennett, Ron; Menashi, Steven; Finley, Steve; Jones, Diane; Mangold,

Donna; Johnson, Wayne

Subject: Dream Center Meeting - INTERNAL DELIBERATIVE WORK COPY

From: Frola, Michael

Sent: Tuesday, June 05, 2018 9:28 AM

To: Holland, Linda

Subject: Dream Center Meeting

Hi Linda,

Please send out the attachment to attendees on the 9:30 AM meeting. I'm bringing hard copies.

Thanks, Mike

Michael Frola

Director

Multi-Regional and Foreign School Participation Division

Office: (202) 377-3364 michael.frola@ed.gov StudentAid.gov



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For Inte	rnal FSA Use only - Unvalidated Data	Yellow = Closing										
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OPEID6	School Name	City	ST	Total Outstanding	Borrowers	Loans	(2016-2017)	Accreditor	Including Main	Closing	Remaining	Notes
009270	Art Institute of Atlanta (The)	Atlanta	GA	\$42,749,246	2,011	11,513	\$58,829,701	SACS	5	3	2	
020789	Art Institute of Colorado (The)	Denver	CO	\$7,856,880	371	2,055	\$8,737,824	HLC	2	2	0	
010195	Art Institute of Fort Lauderdale (The)	Fort Lauderdale	FL	\$8,083,900	349	2,177	\$10,802,557	WASC (Formerly ACICS)	3	3	0	
021171	Art Institute of Houston (The)	Houston	TX	\$33,093,898	1,571	8,912	\$40,056,875	SACS	3	0	3	
008350	Art Institute of Philadelphia (The)	Philadelphia	PA	\$12,153,385	598	3,298	\$15,127,626	Middle States	3	3	0	
												(b)(5)
040513	Art Institute of Phoenix (The)	Phoenix	AZ	\$24,629,473	1,197	7,006	\$51,169,074	WASC (Formerly ACICS)	6	5	1	` ' '
007470	Art Institute of Pittsburgh (The)	Pittsburgh	PA	\$39,368,550	1,951	10,257	\$59,384,466	Middle States	1	0	1	

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\$9,154,199 NWCCU

\$31,276,012 HLC

\$41,763,108 SACS

\$281,907,626 SACS

\$347,861,790 WASC

\$964,216,626

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007819 Art Institute of Portland (The)

022913 Art Institute of Seattle (The)

012584 Illinois Institute of Art (The)

013039 South University

021799 Argosy University

008878 Miami International University of Art & Design

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021799 02179943 Argosy University 021799 02179944 Argosy University	021799	02179935	Argosy University
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021799	02179949	Argosy University

Red text = Art Institute additional location under South or Argosy OPEID

Location Name
Art Institute of Atlanta (The) - Art Institute of Washington (The)
Art Institute of Atlanta (The) - Art Institute of Tennessee-Nashville
Art Institute of Atlanta (The) - The Art Institute of Charleston
Art Institute of Colorado (The)
Art Institute of Colorado (The)
Art Institute of Fort Lauderdale (The)
Art Institute of Fort Lauderdale (The) - Harbor Place Building
Art Institute of Fort Lauderdale (The) - Harbor Place Building
Art Institute of Philadelphia (The) -
Art Institute of Philadelphia (The)
Art Institute of Philadelphia (The) -
Art Institute of Phoenix (The)
Art Institute of Phoenix (The) - Art Institute of Indianapolis (The)
Art Institute of Phoenix (The) - ATS Michigan City Humane
Art Institute of Phoenix (The) - ATS N Canton Higbee
Art Institute of Phoenix (The) - The Art Institute of Vancouver
Art Institute of Portland (The)
Art Institute of Portland (The) - Industrial Design Workshop
Art Institute of Portland (The) - Culinary Arts Facility
Illinois Institute of Art (The)
Illinois Institute of Art (The) - The IL Institute of Art - Schaumburg
The Illinois Institute of Art -
Illinois Institute of Art (The) - The Art Institute of Michigan
South University - Novi
South University - Cleveland
South University - High Point
Argosy University - Washington D.C. Area
Argosy University - San Francisco Bay Area
Argosy University - Seattle
Argosy University - Nashville
Argosy University - Sarasota
Argosy University - Dallas
Argosy University - Schaumburg
Argosy University - San Diego
Argosy University - Denver
Argosy University - Inland Empire
Argosy University - Salt Lake City
Argosy University - The Art Institute of California - Hollywood
Argosy University - The Art Institute of California - San Francisco
Argosy University - The Art Institute of California - Orange County
Argosy University - The Art Institute of California - Sacramento

Argosy University - The Art Institute of California - San Diego

Argosy University - The Art Institute of California - Inland Empire

Argosy University - UT National Guard Base, SLC

				Total
Address 1	Address 2	City	State	Outstanding
The Ames Center	1820 North Fort Myer Drive	Arlington	VA	\$7,258,421
100 CNA Drive	1020 NOITH OF MIYER BINC	Nashville	TN	\$5,717,278
24 North Market Street	The Carroll Building	Charleston	SC	\$3,775,970
1200 Lincoln Street	The carron building	Denver	co	\$7,856,880
675 South Broadway		Denver	со	<i>\$7,030,000</i>
1799 Southeast 17th Street		Fort Lauderdale	FL	\$8,083,900
1650 Southeast 17th Street		Fort Lauderdale	FL	\$6,003,500
1600 Southeast 17th Street		Fort Lauderdale	FL	
1622 Chestnut Street		Philadelphia	PA	\$12,153,385
2300 Market Street		Philadelphia	PA	712,133,363
1610 Chestnut Street		Philadelphia	PA	
2233 West Dunlap Avenue		Phoenix	AZ	\$8,553,168
3500 Depauw Boulevard		Indianapolis	IN	\$7,069,790
722 US Highway 212		Michigan City	IN	\$7,069,790
4839 Highee Avenue NW		Canton	OH	
2665 Renfrew Street		Vancouver	ОП	
1122 NorthWest Davis Street		Portland	OR	\$7,664,052
722 NW Couch Street		Portland		\$7,004,052
			OR	
34 NW 8th Avenue	Suite 126 I	Portland	OR	¢10,400,100
350 North Orleans Street	Suite 136-L	Chicago	IL	\$10,480,106
1000 Plaza Drive	Suite 100	Schaumburg	IL	\$4,890,250
180 North Wabash Avenue		Chicago	IL	ć5 720 27 <i>6</i>
28175 Cabot Drive		Novi	MI	\$5,739,276
41555 Twelve Mile Road		Novi	MI	\$8,129,273
4743 Richmond Road		Warrensville Heights	OH	\$7,248,636
3975 Premier Drive		High Point	NC	\$5,594,967
1550 Wilson Boulevard	Suite 600	Arlington	VA	\$26,275,359
1005 Atlantic Avenue		Alameda	CA	\$10,260,036
2601-A Elliott Avenue		Seattle	WA	\$703,625
100 Centerview Drive	Suite 225	Nashville	TN	\$7,818,772
5250 17th Street		Sarasota	FL	\$10,579,114
5001 Lyndon B Johnson Frwy		Dallas	TX	\$7,898,058
1000 Plaza Drive		Schaumburg	IL	\$12,355,565
1615 Murray Canyon Road	Suite 100	San Diego	CA	\$4,238,132
7600 E Eastman Avenue		Denver	СО	\$4,379,968
3401 Centrelake Drive		Ontario	CA	\$9,479,710
121 Election Road	Suite 300	Draper	UT	\$3,540,748
5250 Lankershim Boulevard		North Hollywood	CA	\$10,969,759
10 United Nations Plaza		San Francisco	CA	\$4,646,684
3601 West Sunflower Avenue		Santa Ana	CA	\$7,697,967
2850 Gateway Oaks Drive	Suite 100	Sacramento	CA	\$5,681,837

7650 Mission Valley Road	San Diego	CA	\$7,333,851
674 East Brier Drive	San Bernardino	CA	\$12,314,815
765 North 2200 West	Salt Lake City	UT	
			\$256,389,352

		Estimated	Estimated	
		Percent of	Funding (2016-	
Borrowers	Loans	Main	2017)	Accreditor
310	1,913	17.0%	\$9,988,731	
257	1,504	13.4%	\$7,867,876	
211	1,055	8.8%	\$5,196,330	
371	2,055	100.0%	\$8,737,824	
		0.0%	· .	HLC
349	2,177	100.0%		WASC (Formerly ACICS)
		0.0%	· ·	WASC (Formerly ACICS)
		0.0%		WASC (Formerly ACICS)
598	3,298	100.0%		Middle States
		0.0%		Middle States
		0.0%		Middle States
392	2,443	34.7%		WASC (Formerly ACICS)
366	2,056	28.7%	\$14,687,875	WASC (Formerly ACICS)
		0.0%		WASC (Formerly ACICS)
		0.0%	\$0	WASC (Formerly ACICS)
		0.0%		WASC (Formerly ACICS)
306	2,030	100.0%	\$8,145,769	NWCCU
		0.0%	\$0	NWCCU
		0.0%		NWCCU
515	2,944	47.9%	\$14,980,048	the state of the s
229	1,332	22.3%	\$6,990,023	
		0.0%		HLC
318	1,603	26.2%	\$8,203,603	
341	1,407	2.8%	\$7,882,341	P2.188.238.5
329	1,321	2.5%	\$7,028,454	
235	1,084	1.9%	\$5,425,016	
369	1,353	5.7%	\$19,968,272	
139	710	2.2%	\$7,797,237	
11	82	0.2%	\$534,728	
218	789	1.7%	\$5,941,969	
258	884	2.3%	\$8,039,724	
299	1,067	1.7%	\$6,002,223	
155	694	2.7%	\$9,389,759	
111	489	0.9%	\$3,220,819	
150	427	1.0%	\$3,328,609	
279	1,183	2.1%	\$7,204,219	
115	364	0.8%	\$2,690,834	
550	3,107	2.4%	\$8,336,599	
222	1,196	1.0%	\$3,531,303	
302	1,967	1.7%	\$5,850,162	
261	1,511	1.2%	\$4,317,980	WASC

9,469	49,488		\$259,920,418	
		0.0%	\$0	WASC
562	3,473	2.7%	\$9,358,790	WASC
341	1,970	1.6%	\$5,573,447	WASC

Green = Staying Open

Yellow = Closing

Red text = Art Institute additional location under South or Argosy OPEID

rnal FSA Use only - Unvalidated Data

Estimated Percent of Main 46.7% | Main | OPEID | OPEID | Main Nan | O99270 | O9927000 | Art Institute of Atlanta (The) | O09270 | O09227002 | Art Institute of Atlanta (The) | O09270 | O09227003 | Art Institute of Atlanta (The) | O09270 | O09227003 | Art Institute of Atlanta (The) | O0927003 | O09227003 | Art Institute of Atlanta (The) | O0927003 | O Funding (2016-2017) \$27,445,987 Total Art Institute of Atlanta (The) Main Name Address 2 City State Outstanding \$19,943,927 Art Institute of Atlanta (The) - Art Institute of Washington (The)
Art Institute of Atlanta (The) - Art Institute of Tennessee-Nashville
Art Institute of Atlanta (The) - The Art Institute of Tennessee-Nashville 6600 Peachtree Dunwoody Road 100 Embassy Row Atlanta 17.0% \$9,988,73: 13.4% \$7,867,87 The Ames Center 100 CNA Drive 24 North Market Street TN The Carroll Building Suite 100 Art Institute of Atlanta (The) - The Art Institute of Charleston
Art Institute of Atlanta (The) - The Art Institute of Virginia Beach
Art Institute of Colorado (The)
Art Institute of Colorado (The)
Art Institute of Fort Lauderdale (The)
Art Institute of Fort Lauderdale (The)
- Harbory Place Building
- Art Institute of Fort Lauderdale (The) - Harbory Place Building
- Art Institute of Fort Lauderdale (The) - Harbory Place Building
- Art Lingtitute of Fort Lauderdale (The) 24 North Market Street
4500 Main Street
1200 Lincoln Street
675 South Broadway
1799 Southeast 17th Street
1600 Southeast 17th Street 009270 00927007 Art Institute of Atlanta (The)
020789 02078900 Art Institute of Colorado (The)
020789 02078904 Art Institute of Colorado (The)
010195 01019500 Art Institute of Fort Lauderdale (The) \$4,840,020 \$7,856,880 \$8,083,900 349 2,177 Fort Lauderdale Fort Lauderdale Fort Lauderdale Houston Austin San Antonio \$14,804,085 021171 02117102 Art Institute of Houston (The) 021171 02117104 Art Institute of Houston (The) 08350 00835000 Art Institute of Philadelphia (The) 1622 Chestnut Street 2300 Market Street \$12,153,385 3,298 100.0% \$15,127,626 0.09 Art Institute of Phoenix (The) - Art Institute of Las Vegas (The) 425 2,401 040513 04051303 Art Institute of Phoenix (The) 2350 Corporate Circle Henderson \$8,623,775 35.0% \$17,916,363 Art Institute of Phoenix (The) - Art Institute of Indianapolis (The Art Institute of Phoenix (The) - ATS Michigan City Humane Art Institute of Phoenix (The) - ATS N Canton Higbee 3500 Depauw Boulevard 722 US Highway 212 Indianapolis Michigan City 2,056 \$14,687,87 040513 04051304 Art Institute of Phoenix (The) 040513 04051334 Art Institute of Phoenix (The) 007470 00747000 Art Institute of Pittsburgh (The) Art Institute of Pittsburgh (The) 420 Boulevard of the Allies PA \$39,368,550 1,951 10,257 100.0% \$59.384.466 Art Institute of Prittsough Liney
Art Institute of Portland (The)
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Chicago \$8,167,998 388 2.074 \$9,154,199 **515** 229 0.12584 0.1258403 Illinois histitute of Art (Tre)
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21301 Biscayne Boulevard
4001 North Hims Avenue
Two North Park
Three Lake Pointe Plaza
410 Biscayeel Street
709 Mail Boulevard
9001 Belvederer Road
5355 Vaughn Road
9 546nece Court
4001 North Himes Avenue
6600 Peachtree Dunwoody Road
2131 Old Brick Road
301 Bendrick Road Novi Miami Tampa Dallas Charlotte Durham Savannah Royal Palm Beach Montgomery Columbia Tampa Atianta Gienn Allen Virginia Beach Novi Suite 100 Suite 150 8080 Park Lane, Suite 100 2110 Water Ridge Parkway Suite 10 \$5,739,276 \$8,666,634 \$5,176,440 \$2,753,242 \$1,725,267 363 259 362 210 42.3% \$17,658,215 2,243 \$10,546,96 \$5,609,71 \$3,515,22 Miami International University
South University - West Palm Beach Campus
South University - Wontgomery
South University - Montgomery
South University - Columbia
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Life South University - Tampa
Life South University - Art Institute of Atlanta 241 6,504 10.5% \$4,372,821 63.5% \$179,092,157 4.5% \$12,669,781 2.5% \$6,958,988 8.8% \$24,790,246 5.0% \$14,067,138 22,940 2,882 1,405 3,548 2,328 \$184,702,627 \$13,066,691 \$7,176,994 \$25,566,857 \$14,507,823 662 328 817 673 Parkside at Tampa Bay Park South University - Art Insutes - South University - Richmond South University - Virginia Beach \$11,615,799 \$7,047,058 502 331 2,097 1,552 \$11,262,96 \$6,832,99 2.8% \$7,882,341 1.4% \$3,906,804 MI \$8,129,273 TX \$4,029,194 OH \$7,248,636 NC \$5,594,967 South University - Novi 1220 West Louis Henna Boulevard 4743 Richmond Road 3975 Premier Drive 250 1,015 013039 01303914 South University Round Rock South University - Cleveland South University - High Point South University - Orlando ATS Argosy University Argosy University - Twin Cities Argosy University - Atlanta Suite 140 4901 Vineland Road 601 South Lewis Street 1515 Central Parkway 980 Hammond Drive Suite 600 1001 Bishop Street 2233 West Colonial Co Argosy University - San Francisco Bay Area Argosy University - Tampa Argosy University - Maui Campus Argosy University - Hilo Campus
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Argosy University - Los Angeles 021799 02179928 Argosy University Los Angele \$8,567,941 239 1.062 1.9% \$6,511,309 Argosy University - San Diago
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Argosy University - Western State University College of Law \$3,220,819 \$3,328,609 \$7,204,219 \$2,690,834 121 Election Road 225 North Michigan Avenue 1 Banting Drive 5250 Lankershim Boulevard 11128 Magnolia Avenue \$12,060,501 2.4% \$8,336,592 0.0% \$0 1.0% \$3,531,303 1.7% \$5,850,162 1.2% \$4,317,980 1.6% \$5,573,447 2.7% \$9,358,790 North Hollyw North Hollyw Argosy University - The Art Institute of California - Hollywood Argosy University - Ai Hollywood (The Shed) \$4,646,684 \$7,697,967 \$5,681,837 \$7,333,851 \$12,314,815 021799 02179943 Argosy University 021799 02179944 Argosy University 021799 02179945 Argosy University 021799 02179947 Argosy University 021799 02179948 Argosy University 10 United Nations Plaza 3601 West Sunflower Avenue 2850 Gateway Oaks Drive 7650 Mission Valley Road 674 East Brier Drive 222 302 261 341 562 1,196 1,967 1,511 1,970 3,473 Suite 100 765 North 2200 West 1255 South Spectrom Boulevard 1000 Halsey Avenue Argosy University - UT National Guard Base Argosy University - Phoenix ATS Chandler Argosy University - Clay National Guard Ce 0.0% \$0 0.0% \$0

\$969,250,111 35,182 158,446

NSLDS QUERY MANAGEMENT FACILITY QUERIES

The results of the following queries were combined for this estimate.

-- Query to Sum Outstanding Amounts for Borrowers with Enrollment Reported

```
SELECT L.SCH BR CODE, L.SCH CODE
, SUM(L.OUT PRIN BAL + L.OUT INT BAL) TOTAL OUT
, COUNT(DISTINCT(HEX(L.STU NO)!!HEX(L.STU SEQ NO))) BOR COUNT
, COUNT(*) LOAN COUNT
FROM LOAN L
WHERE L.SCH CODE IN (
'007470','007819','008350','008878',
'009270','010195','012584','013039','020789',
'021171','021799','022913','040513')
AND L.CURR MAT DT >= CURRENT DATE - 120 DAYS
AND L.OUT PRIN BAL + L.OUT INT BAL > 0
AND EXISTS (SELECT *
FROM STU BR S
WHERE S.SCH CODE = L.SCH CODE
AND S.STU NO = L.STU NO
AND S.STU SEQ NO = L.STU SEQ NO
AND S.VAL IND = ' '
AND ANTIC COMPL DT >= CURRENT DATE - 120 DAYS
AND ANTIC COMPL DT <> '0001-01-01'
AND ((S.ENRL CODE IN ('F', 'H', 'Q', 'A', 'L'))
OR (S.ENRL CODE = 'W'
AND S.EFF DT > CURRENT DATE - 120 DAYS)))
GROUP BY L.SCH BR CODE, L.SCH CODE
```

-- Query to Sum Outstanding Amounts for Borrowers with Enrollment Not Yet Reported

```
SELECT L.SCH BR CODE, L.SCH CODE
, SUM(L.OUT PRIN BAL + L.OUT INT BAL) TOTAL OUT
, COUNT(DISTINCT(HEX(L.STU NO)!!HEX(L.STU SEQ NO))) BOR COUNT
, COUNT (*) LOAN COUNT
FROM LOAN L
WHERE L.SCH CODE IN (
'007470','007819','008350','008878',
'009270','010195','012584','013039','020789',
'021171','021799','022913','040513')
AND L.PER BEG DT >= CURRENT DATE - 120 DAYS
AND L.CURR LOAN STAT IN ('IA','ID')
AND L.OUT PRIN BAL + L.OUT INT BAL > 0
AND NOT EXISTS (SELECT *
FROM STU BR S
WHERE S.SCH CODE = L.SCH CODE
AND S.STU NO = L.STU NO
```

```
AND S.STU_SEQ_NO = L.STU_SEQ_NO
AND S.VAL_IND = ' '
AND ((S.ENRL_CODE IN ('G','F','H','Q','A','L'))
OR (S.ENRL_CODE = 'W'
AND S.EFF_DT > CURRENT DATE - 120 DAYS)))
GROUP BY L.SCH_BR_CODE, L.SCH_CODE
```

Federal Student Aid PROUD SPONSOR of the AMERICAN MIND" An OFFICE of the U.S. DEPARTMENT of EDUCATION

Frola, Michael

From: Frola, Michael

Sent: Tuesday, June 5, 2018 2:27 PM

To: Holland, Linda; Smith, Kathleen; Minor, Robin; Bennett, Ron; Menashi, Steven; Finley,

Steve; Jones, Diane; Mangold, Donna; Johnson, Wayne; O'Brien, Marianna; Frola,

Michael (Michael.Frola@ed.gov)

Subject: RE: Dream Center Meeting - INTERNAL DELIBERATIVE WORK COPY

Attachments: Dream Center Potential Closures Report 6.5.xlsx

Please see attached updated Dream Center report.

Thanks, Mike

Michael Frola

Director

Multi-Regional and Foreign School Participation Division

Office: (202) 377-3364 michael.frola@ed.gov StudentAid.gov



PROUD SPONSOR of the AMERICAN MIND

From: Holland, Linda

Sent: Tuesday, June 05, 2018 9:35 AM

To: Smith, Kathleen; Minor, Robin; Frola, Michael; Bennett, Ron; Menashi, Steven; Finley, Steve; Jones, Diane; Mangold,

Donna; Johnson, Wayne

Subject: Dream Center Meeting - INTERNAL DELIBERATIVE WORK COPY

From: Frola, Michael

Sent: Tuesday, June 05, 2018 9:28 AM

To: Holland, Linda

Subject: Dream Center Meeting

Hi Linda,

Please send out the attachment to attendees on the 9:30 AM meeting. I'm bringing hard copies.

Thanks, Mike

Michael Frola

Director

Multi-Regional and Foreign School Participation Division

Office: (202) 377-3364 michael.frola@ed.gov



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For Internal FSA Use only - Unvalidated Data	Yellow = Closing	

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										# of		
							Total Title IV		# of Locations	Locations	# of Locations	
OPEID6	School Name	City	ST	Total Outstanding	Borrowers	Loans	(2016-2017)	Accreditor	Including Main	Closing	Remaining	Notes
009270	Art Institute of Atlanta (The)	Atlanta	GA	\$42,749,246	2,011	11,513	\$58,829,701	SACS	5	3	2	
020789	Art Institute of Colorado (The)	Denver	CO	\$7,856,880	371	2,055	\$8,737,824	HLC	2	2	0	
010195	Art Institute of Fort Lauderdale (The)	Fort Lauderdale	FL	\$8,083,900	349	2,177	\$10,802,557	WASC (Formerly ACICS)	3	3	0	
021171	Art Institute of Houston (The)	Houston	TX	\$33,093,898	1,571	8,912	\$40,056,875	SACS	3	0	3	
008350	Art Institute of Philadelphia (The)	Philadelphia	PA	\$12,153,385	598	3,298	\$15,127,626	Middle States	3	3	0	
040513	Art Institute of Phoenix (The)	Phoenix	AZ	\$24,629,473	1,197	7,006	\$51,169,074	WASC (Formerly ACICS)	6	5	1	Planning to close the main - will need to redesignate the remaining location for it to stay open. A redesignatation will require state and accreditor approvals.
007470	Art Institute of Pittsburgh (The)	Pittsburgh	PA	\$39,368,550	1,951	10,257	\$59,384,466	Middle States	1	0	1	
007819	Art Institute of Portland (The)	Portland	OR	\$7,664,052	306	2,030	\$8,145,769	NWCCU	3	3	0	
022913	Art Institute of Seattle (The)	Seattle	WA	\$8,167,998	388	2,074	\$9,154,199	NWCCU	2	0	2	
012584	Illinois Institute of Art (The)	Chicago	IL	\$21,880,832	1,091	6,099	\$31,276,012	HLC	4	4	0	
008878	Miami International University of Art & Design	Miami	FL	\$20,497,291	1,437	5,624	\$41,763,108	SACS	5	0	5	
013039	South University	Savannah	GA	\$290,739,025	11,047	41,729	\$281,907,626	SACS	13	3	10	
021799	Argosy University	Orange	CA	\$457,735,820	13,086	57,096	\$347,861,790	WASC	32	18	14	
				\$974,620,350	35,403	159,870	\$964,216,626		82	44	38	

For Internal FSA Use only - Unvalidated Data

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021799	02179948	Argosy University
021799	02179949	Argosy University

Red text = Art Institute additional location under South or Argosy OPEID

Location Name
Art Institute of Atlanta (The) - Art Institute of Washington (The)
Art Institute of Atlanta (The) - Art Institute of Tennessee-Nashville
Art Institute of Atlanta (The) - The Art Institute of Charleston
Art Institute of Colorado (The)
Art Institute of Colorado (The)
Art Institute of Fort Lauderdale (The)
Art Institute of Fort Lauderdale (The) - Harbor Place Building
Art Institute of Fort Lauderdale (The) - Harbor Place Building
Art Institute of Philadelphia (The) -
Art Institute of Philadelphia (The)
Art Institute of Philadelphia (The) -
Art Institute of Phoenix (The)
Art Institute of Phoenix (The) - Art Institute of Indianapolis (The)
Art Institute of Phoenix (The) - ATS Michigan City Humane
Art Institute of Phoenix (The) - ATS N Canton Higbee
Art Institute of Phoenix (The) - The Art Institute of Vancouver
Art Institute of Portland (The)
Art Institute of Portland (The) - Industrial Design Workshop
Art Institute of Portland (The) - Culinary Arts Facility
Illinois Institute of Art (The)
Illinois Institute of Art (The) - The IL Institute of Art - Schaumburg
The Illinois Institute of Art -
Illinois Institute of Art (The) - The Art Institute of Michigan
South University - Novi
South University - Cleveland
South University - High Point
Argosy University - Washington D.C. Area
Argosy University - San Francisco Bay Area
Argosy University - Seattle
Argosy University - Nashville
Argosy University - Sarasota
Argosy University - Dallas
Argosy University - Schaumburg
Argosy University - San Diego
Argosy University - Denver
Argosy University - Inland Empire
Argosy University - Salt Lake City
Argosy University - The Art Institute of California - Hollywood
Argosy University - The Art Institute of California - San Francisco
Argosy University - The Art Institute of California - Orange County
Argosy University - The Art Institute of California - Sacramento

Argosy University - The Art Institute of California - San Diego

Argosy University - The Art Institute of California - Inland Empire

Argosy University - UT National Guard Base, SLC

				Total
Address 1	Address 2	City	State	Outstanding
The Ames Center	1820 North Fort Myer Drive	Arlington	VA	\$7,258,421
100 CNA Drive	1020 NOITH OF INITIAL	Nashville	TN	\$5,717,278
24 North Market Street	The Carroll Building	Charleston	SC	\$3,775,970
1200 Lincoln Street	The carron banding	Denver	co	\$7,856,880
675 South Broadway		Denver	СО	\$7,030,000
1799 Southeast 17th Street		Fort Lauderdale	FL	\$8,083,900
1650 Southeast 17th Street		Fort Lauderdale	FL	\$6,003,500
1600 Southeast 17th Street		Fort Lauderdale	FL	
1622 Chestnut Street		Philadelphia	PA	\$12,153,385
2300 Market Street		Philadelphia	PA	712,133,303
1610 Chestnut Street		Philadelphia	PA	
2233 West Dunlap Avenue		Phoenix	AZ	\$8,553,168
3500 Depauw Boulevard		Indianapolis	IN	\$7,069,790
722 US Highway 212		Michigan City	IN	\$7,009,790
4839 Higbee Avenue NW		Canton	OH	
2665 Renfrew Street		Vancouver	OII	
1122 NorthWest Davis Street		Portland	OR	\$7,664,052
722 NW Couch Street		Portland	OR	\$7,004,032
34 NW 8th Avenue		Portland	OR	
350 North Orleans Street	Suite 136-L	Chicago	IL	\$10,480,106
1000 Plaza Drive	Suite 100	Schaumburg	IL	\$4,890,250
180 North Wabash Avenue	Suite 100		IL	\$4,690,230
28175 Cabot Drive		Chicago Novi	MI	¢5 720 276
41555 Twelve Mile Road		Novi	MI	\$5,739,276 \$8,129,273
4743 Richmond Road			OH	
3975 Premier Drive		Warrensville Heights	NC	\$7,248,636 \$5,594,967
1550 Wilson Boulevard	Suite 600	High Point Arlington	VA	\$5,394,967
	Suite 600			
1005 Atlantic Avenue 2601-A Elliott Avenue		Alameda	CA	\$10,260,036
100 Centerview Drive	Suite 225	Seattle Nashville	TN	\$703,625 \$7,818,772
5250 17th Street	Suite 225	Sarasota	_	
5001 Lyndon B Johnson Frwy		Dallas	FL TX	\$10,579,114
1000 Plaza Drive		Schaumburg		\$7,898,058
	Suite 100		IL CA	\$12,355,565
1615 Murray Canyon Road	Suite 100	San Diego	CA	\$4,238,132
7600 E Eastman Avenue		Denver	CO	\$4,379,968
3401 Centrelake Drive	Suite 200	Ontario	CA	\$9,479,710
121 Election Road	Suite 300	Draper	UT	\$3,540,748
5250 Lankershim Boulevard		North Hollywood	CA	\$10,969,759
10 United Nations Plaza		San Francisco	CA	\$4,646,684
3601 West Sunflower Avenue	Suite 100	Santa Ana	CA	\$7,697,967
2850 Gateway Oaks Drive	Suite 100	Sacramento	CA	\$5,681,837

7650 Mission Valley Road	San Diego	CA	\$7,333,851
674 East Brier Drive	San Bernardino	CA	\$12,314,815
765 North 2200 West	Salt Lake City	UT	
			\$256,389,352

		Estimated	Estimated	
		Percent of	Funding (2016-	
Borrowers	Loans	Main	2017)	Accreditor
310	1,913	17.0%	\$9,988,731	
257	1,504	13.4%	\$7,867,876	
211	1,055	8.8%	\$5,196,330	
371	2,055	100.0%	\$8,737,824	
		0.0%	· .	HLC
349	2,177	100.0%		WASC (Formerly ACICS)
		0.0%		WASC (Formerly ACICS)
		0.0%		WASC (Formerly ACICS)
598	3,298	100.0%		Middle States
		0.0%		Middle States
		0.0%		Middle States
392	2,443	34.7%		WASC (Formerly ACICS)
366	2,056	28.7%	\$14,687,875	WASC (Formerly ACICS)
		0.0%		WASC (Formerly ACICS)
		0.0%	\$0	WASC (Formerly ACICS)
		0.0%		WASC (Formerly ACICS)
306	2,030	100.0%	\$8,145,769	NWCCU
		0.0%	\$0	NWCCU
		0.0%		NWCCU
515	2,944	47.9%	\$14,980,048	
229	1,332	22.3%	\$6,990,023	
		0.0%		HLC
318	1,603	26.2%	\$8,203,603	
341	1,407	2.8%	\$7,882,341	
329	1,321	2.5%	\$7,028,454	
235	1,084	1.9%	\$5,425,016	
369	1,353	5.7%	\$19,968,272	
139	710	2.2%	\$7,797,237	
11	82	0.2%	\$534,728	
218	789	1.7%	\$5,941,969	
258	884	2.3%	\$8,039,724	
299	1,067	1.7%	\$6,002,223	
155	694	2.7%	\$9,389,759	
111	489	0.9%	\$3,220,819	
150	427	1.0%	\$3,328,609	
279	1,183	2.1%	\$7,204,219	
115	364	0.8%	\$2,690,834	
550	3,107	2.4%	\$8,336,599	
222	1,196	1.0%	\$3,531,303	
302	1,967	1.7%	\$5,850,162	
261	1,511	1.2%	\$4,317,980	WASC

9,469	49,488		\$259,920,418	
		0.0%	\$0	WASC
562	3,473	2.7%	\$9,358,790	WASC
341	1,970	1.6%	\$5,573,447	WASC

Green = Staying Open

Yellow = Closing

Red text = Art Institute additional location under South or Argosy OPEID

rnal FSA Use only - Unvalidated Data

Estimated Percent of Main 46.7% | Main | OPEID | OPEID | Main Nan | O99270 | O9927000 | Art Institute of Atlanta (The) | O09270 | O09227002 | Art Institute of Atlanta (The) | O09270 | O09227003 | Art Institute of Atlanta (The) | O09270 | O09227003 | Art Institute of Atlanta (The) | O0927003 | O0927003 | Art Institute of Atlanta (The) | O0927003 | O0 Funding (2016-2017) \$27,445,987 Total Art Institute of Atlanta (The) Main Name Address 2 City State Outstanding \$19,943,927 Art Institute of Atlanta (The) - Art Institute of Washington (The)
Art Institute of Atlanta (The) - Art Institute of Tennessee-Nashville
Art Institute of Atlanta (The) - The Art Institute 6600 Peachtree Dunwoody Road 100 Embassy Row Atlanta 17.0% \$9,988,73 13.4% \$7,867,87 The Ames Center 100 CNA Drive 24 North Market Street TN The Carroll Building Suite 100 Art Institute of Atlanta (The) - The Art Institute of Charleston
Art Institute of Atlanta (The) - The Art Institute of Virginia Beach
Art Institute of Colorado (The)
Art Institute of Colorado (The)
Art Institute of Fort Lauderdale (The)
Art Institute of Fort Lauderdale (The)
- Harbory Place Building
- Art Institute of Fort Lauderdale (The) - Harbory Place Building
- Art Institute of Fort Lauderdale (The) - Harbory Place Building 24 North Market Street
4500 Main Street
1200 Lincoln Street
675 South Broadway
1799 Southeast 17th Street
1600 Southeast 17th Street 009270 00927007 Art Institute of Atlanta (The)
020789 02078900 Art Institute of Colorado (The)
020789 02078904 Art Institute of Colorado (The)
010195 01019500 Art Institute of Fort Lauderdale (The) \$4,840,020 \$7,856,880 \$8,083,900 349 2,177 Fort Lauderdale Fort Lauderdale Fort Lauderdale Houston Austin San Antonio \$14,804,085 021171 02117102 Art Institute of Houston (The) 021171 02117104 Art Institute of Houston (The) 08350 00835000 Art Institute of Philadelphia (The) 1622 Chestnut Street 2300 Market Street \$12,153,385 3,298 100.0% \$15,127,626 0.09 Art Institute of Phoenix (The) - Art Institute of Las Vegas (The) 425 2,401 040513 04051303 Art Institute of Phoenix (The) 2350 Corporate Circle Henderson \$8,623,775 35.0% \$17,916,363 Art Institute of Phoenix (The) - Art Institute of Indianapolis (The Art Institute of Phoenix (The) - ATS Michigan City Humane Art Institute of Phoenix (The) - ATS N Canton Higbee 3500 Depauw Boulevard 722 US Highway 212 Indianapolis Michigan City 2,056 \$14,687,87 040513 04051304 Art Institute of Phoenix (The) 040513 04051334 Art Institute of Phoenix (The) 007470 00747000 Art Institute of Pittsburgh (The) Art Institute of Pittsburgh (The) 420 Boulevard of the Allies PA \$39,368,550 1,951 10,257 100.0% \$59.384.466 Art Institute of Prittsough Liney
Art Institute of Portland (The)
Art Institute of Portland (The) - Industrial Design Workshop
Art Institute of Portland (The) - Culinary Arts Facility 1122 NorthWest Davis Street 722 NW Couch Street Art Institute of Portland (The) - Culinary Arts Facility
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012584 01258403 Illinois Institute of Art (The) 34 NW 8th Avenue 2323 Elliott Avenue 2601 Elliott Avenue 350 North Orleans Street 1000 Plaza Drive 180 North Wabash Avenue 28175 Cabot Drive Portland
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Chicago \$8,167,998 388 2.074 \$9,154,199 **515** 229 0.12584 0.1258403 Illinois histitute of Art (Tre)
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2137 Cabo Trom
21301 Biscayne Boulevard
4001 North Hims Avenue
Two North Park
Three Lake Pointe Plaza
410 Biscayeel Street
709 Mail Boulevard
9001 Belvedere Road
5355 Vaughn Road
9 546nece Court
4001 North Himes Avenue
6600 Peachtree Dunwoody Road
2131 Old Brick Road
301 Bendir Road Novi Miami Tampa Dallas Charlotte Durham Savannah Royal Palm Beach Montgomery Columbia Tampa Atianta Gienn Allen Virginia Beach Novi Suite 100 Suite 150 8080 Park Lane, Suite 100 2110 Water Ridge Parkway Suite 10 \$5,739,276 \$8,666,634 \$5,176,440 \$2,753,242 \$1,725,267 363 259 362 210 42.3% \$17,658,215 2,243 \$10,546,96 \$5,609,71 \$3,515,22 Miami International University
South University - West Palm Beach Campus
South University - Wontgomery
South University - Montgomery
South University - Columbia
South University - Tampa
Life South University - Tampa
Life South University - Art Institute of Atlanta 241 6,504 10.5% \$4,372,821 63.5% \$179,092,157 4.5% \$12,669,781 2.5% \$6,958,988 8.8% \$24,790,246 5.0% \$14,067,138 22,940 2,882 1,405 3,548 2,328 \$184,702,627 \$13,066,691 \$7,176,994 \$25,566,857 \$14,507,823 662 328 817 673 Parkside at Tampa Bay Park South University - Art Insutes - South University - Richmond South University - Virginia Beach \$11,615,799 \$7,047,058 502 331 2,097 1,552 \$11,262,96 \$6,832,99 2.8% \$7,882,341 1.4% \$3,906,804 MI \$8,129,273 TX \$4,029,194 OH \$7,248,636 NC \$5,594,967 South University - Novi 1220 West Louis Henna Boulevard 4743 Richmond Road 3975 Premier Drive 250 1,015 013039 01303914 South University Round Rock South University - Cleveland South University - High Point South University - Orlando ATS Argosy University Argosy University - Twin Cities Argosy University - Atlanta Suite 140 4901 Vineland Road 601 South Lewis Street 1515 Central Parkway 980 Hammond Drive Suite 600 1001 Bishop Street 2233 West Colonial Co Argosy University - San Francisco Bay Area Argosy University - Tampa Argosy University - Maui Campus Argosy University - Hilo Campus
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 2.2% \$7,797,237 4.4% \$15,184,498 334 1,257 \$19,980,604 270 Hookahi, Suite 309 1266 Kamehameha Highway, Suite A-\$703,625 \$7,818,772 \$10,579,114 \$7,898,058 11 218 258 299 Seattle Nashville \$534,728 \$5,941,969 Suite 225 Argosy University - Sarasota Argosy University - Dallas \$8,039,724 1000 Plaza Drive 5230 Pacific Concourse 1615 Murray Canyon Road 7600 E Eastman Avenue 3401 Centrelake Drive 121 Election Road Argosy University - Schaumburg
Argosy University - Los Angeles 021799 02179928 Argosy University Los Angele \$8,567,941 239 1.062 1.9% \$6,511,309 Argosy University - San Diago
Argosy Linkersity - San Diago
Argosy University - Denwer
Argosy University - Inland Empire
Argosy University - Inland Empire
Argosy University - Salt Lake City
Argosy University - Western State University College of Law \$3,220,819 \$3,328,609 \$7,204,219 \$2,690,834 121 Election Road 225 North Michigan Avenue 1 Banting Drive 5250 Lankershim Boulevard 11128 Magnolia Avenue \$12,060,501 2.4% \$8,336,592 0.0% \$0 1.0% \$3,531,303 1.7% \$5,850,162 1.2% \$4,317,980 1.6% \$5,573,447 2.7% \$9,358,790 North Hollyw North Hollyw Argosy University - The Art Institute of California - Hollywood Argosy University - Ai Hollywood (The Shed) \$4,646,684 \$7,697,967 \$5,681,837 \$7,333,851 \$12,314,815 021799 02179943 Argosy University 021799 02179944 Argosy University 021799 02179945 Argosy University 021799 02179947 Argosy University 021799 02179948 Argosy University 10 United Nations Plaza 3601 West Sunflower Avenue 2850 Gateway Oaks Drive 7650 Mission Valley Road 674 East Brier Drive 222 302 261 341 562 1,196 1,967 1,511 1,970 3,473 Suite 100 765 North 2200 West 1255 South Spectrom Boulevard 1000 Halsey Avenue Argosy University - UT National Guard Base Argosy University - Phoenix ATS Chandler Argosy University - Clay National Guard Ce 0.0% \$0 0.0% \$0

\$969,250,111 35,182 158,446

NSLDS QUERY MANAGEMENT FACILITY QUERIES

The results of the following queries were combined for this estimate.

-- Query to Sum Outstanding Amounts for Borrowers with Enrollment Reported

```
SELECT L.SCH BR CODE, L.SCH CODE
, SUM(L.OUT PRIN BAL + L.OUT INT BAL) TOTAL OUT
, COUNT(DISTINCT(HEX(L.STU NO)!!HEX(L.STU SEQ NO))) BOR COUNT
, COUNT(*) LOAN COUNT
FROM LOAN L
WHERE L.SCH CODE IN (
'007470','007819','008350','008878',
'009270','010195','012584','013039','020789',
'021171','021799','022913','040513')
AND L.CURR MAT DT >= CURRENT DATE - 120 DAYS
AND L.OUT PRIN BAL + L.OUT INT BAL > 0
AND EXISTS (SELECT *
FROM STU BR S
WHERE S.SCH CODE = L.SCH CODE
AND S.STU NO = L.STU NO
AND S.STU SEQ NO = L.STU SEQ NO
AND S.VAL IND = ' '
AND ANTIC COMPL DT >= CURRENT DATE - 120 DAYS
AND ANTIC COMPL DT <> '0001-01-01'
AND ((S.ENRL CODE IN ('F', 'H', 'Q', 'A', 'L'))
OR (S.ENRL CODE = 'W'
AND S.EFF DT > CURRENT DATE - 120 DAYS)))
GROUP BY L.SCH BR CODE, L.SCH CODE
```

-- Query to Sum Outstanding Amounts for Borrowers with Enrollment Not Yet Reported

```
SELECT L.SCH BR CODE, L.SCH CODE
, SUM(L.OUT PRIN BAL + L.OUT INT BAL) TOTAL OUT
, COUNT(DISTINCT(HEX(L.STU NO)!!HEX(L.STU SEQ NO))) BOR COUNT
, COUNT (*) LOAN COUNT
FROM LOAN L
WHERE L.SCH CODE IN (
'007470','007819','008350','008878',
'009270','010195','012584','013039','020789',
'021171','021799','022913','040513')
AND L.PER BEG DT >= CURRENT DATE - 120 DAYS
AND L.CURR LOAN STAT IN ('IA','ID')
AND L.OUT PRIN BAL + L.OUT INT BAL > 0
AND NOT EXISTS (SELECT *
FROM STU BR S
WHERE S.SCH CODE = L.SCH CODE
AND S.STU NO = L.STU NO
```

```
AND S.STU_SEQ_NO = L.STU_SEQ_NO
AND S.VAL_IND = ' '
AND ((S.ENRL_CODE IN ('G','F','H','Q','A','L'))
OR (S.ENRL_CODE = 'W'
AND S.EFF_DT > CURRENT DATE - 120 DAYS)))
GROUP BY L.SCH_BR_CODE, L.SCH_CODE
```

Federal Student Aid PROUD SPONSOR of the AMERICAN MIND" An OFFICE of the U.S. DEPARTMENT of EDUCATION

Holland, Linda

From: Holland, Linda

Sent: Tuesday, June 12, 2018 9:07 AM

To: Smith, Kathleen; Minor, Robin; Frola, Michael; Bennett, Ron; Mangold, Donna; Finley,

Steve; Menashi, Steven; Jones, Diane; Riemer, Jeffrey (Justin); Johnson, Wayne;

Smith, Kathleen; Bennett, Ron

Subject: FW: DCEH DoE Presentations

Attachments: Online Conversion Plan and Campus Closure Plan by Program Level Detail - 6-11-18

FINAL (v2).pdf; Department of Ed Presentation for June 14, 2018 - FINAL v5.pdf

See attached.

From: Frola, Michael

Sent: Tuesday, June 12, 2018 9:05 AM

To: Holland, Linda

Subject: FW: DCEH DoE Presentations

Good morning Linda,

Please share the attached presentation and Closure Plan with Department staff participating on Thursday's call with

Dream Center. Thanks, Mike

From: Murphy, Shelly M. [mailto:smurphy@dcedh.org]

Sent: Tuesday, June 12, 2018 12:03 AM

To: Frola, Michael

Cc: Richardson, Brent D.; Shelly Murphy **Subject:** Fwd: DCEH DoE Presentations

Hi Mike,

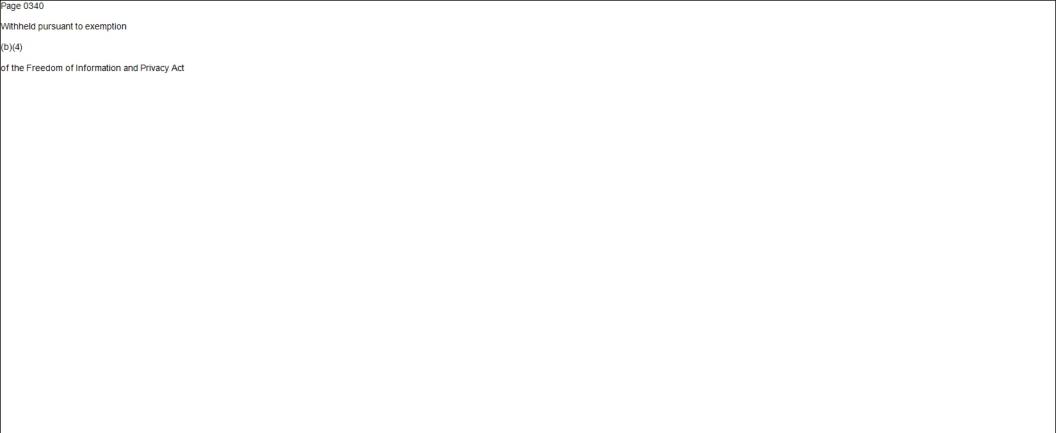
Please find attached DCEH presentation for Thursday's meeting. Please let me know if you have any questions. Looking forward to our discussions on Thursday.

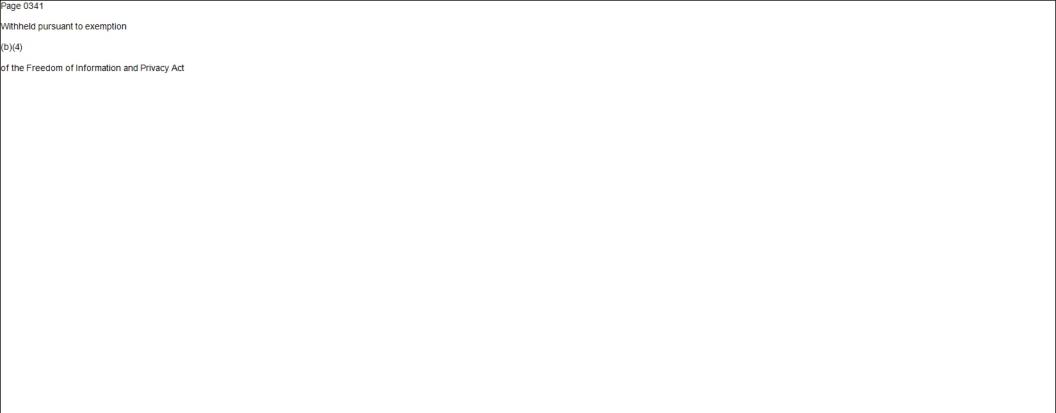
Shelly Murphy Dream Center Education Holdings Regulatory and Government Affairs 480-650-4249

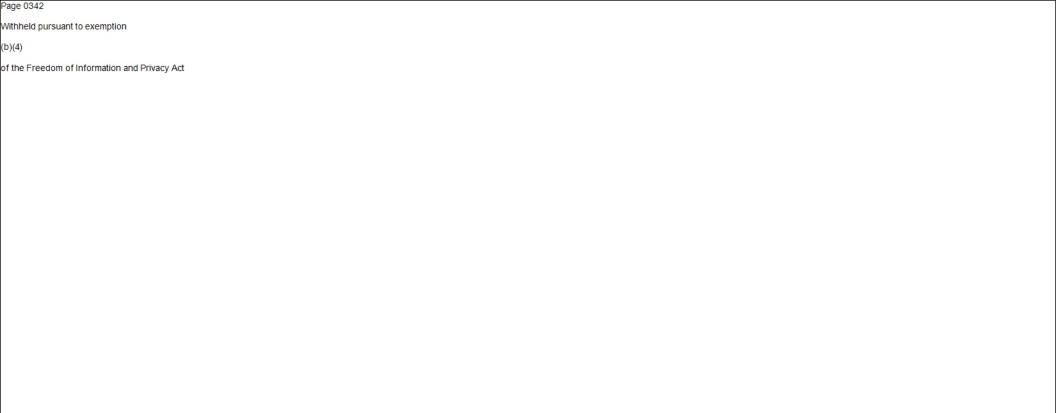
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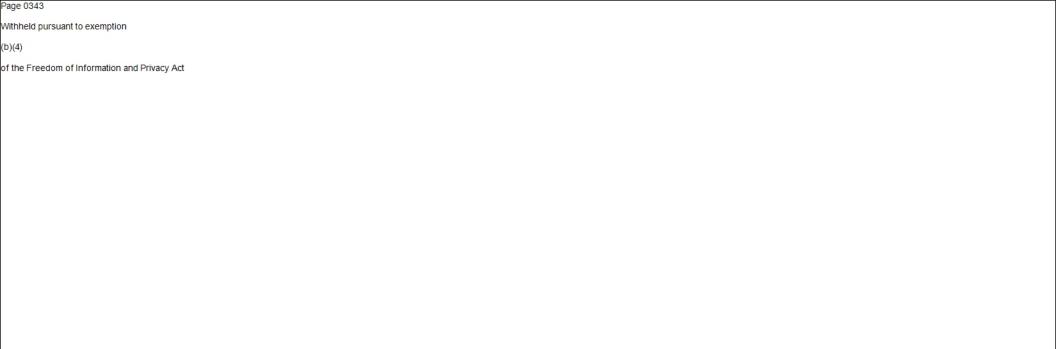


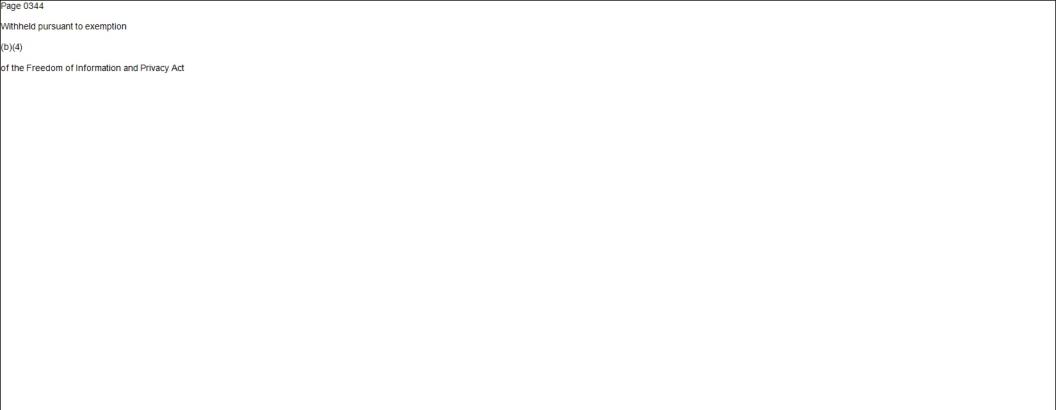




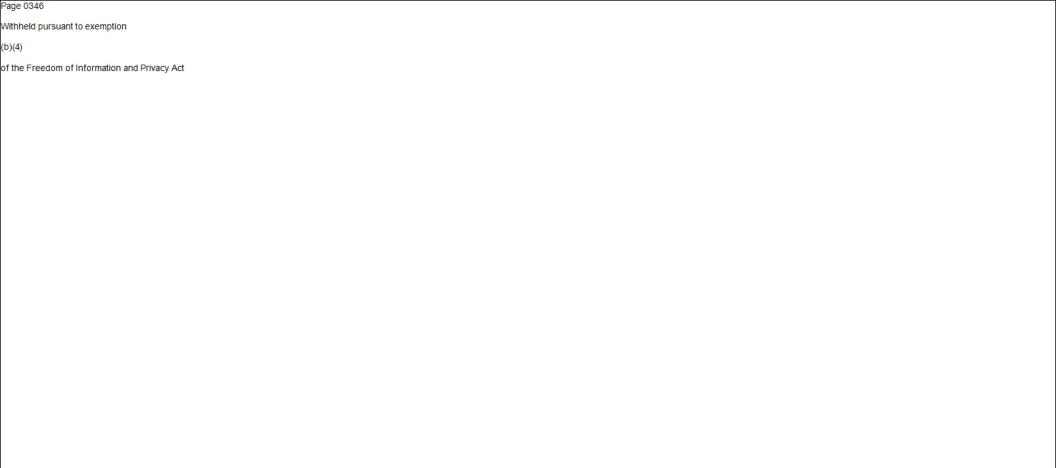




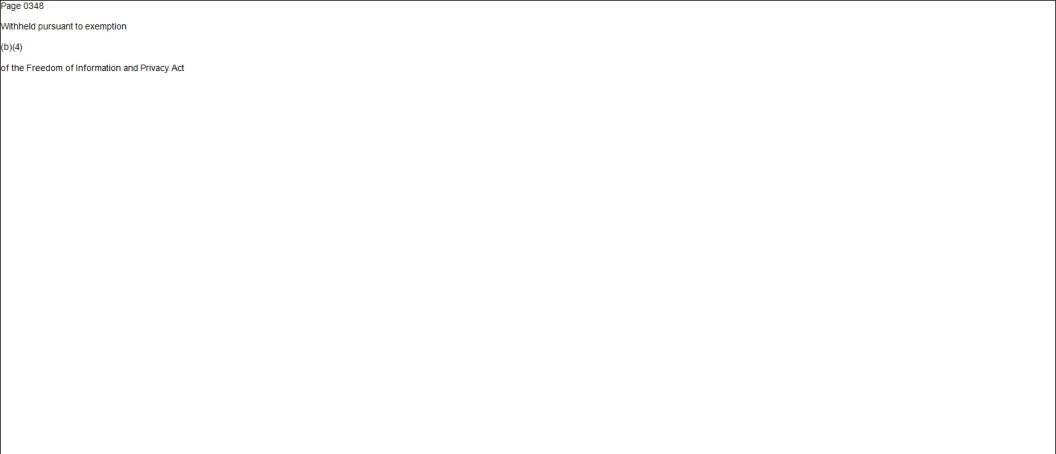


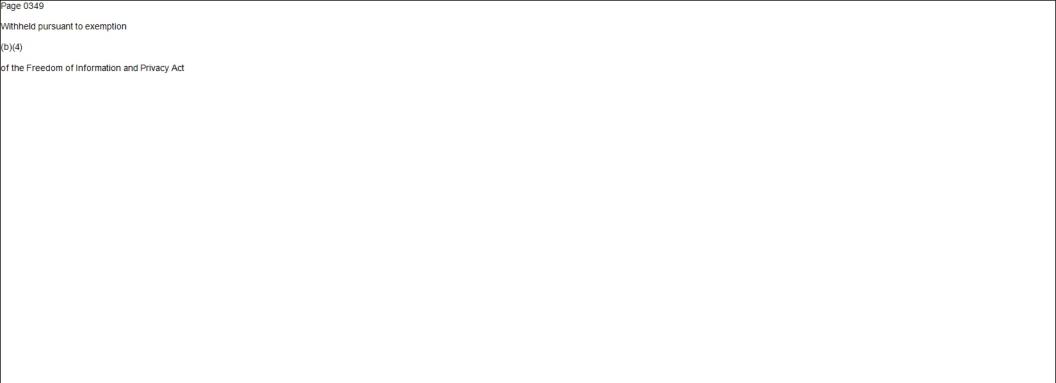


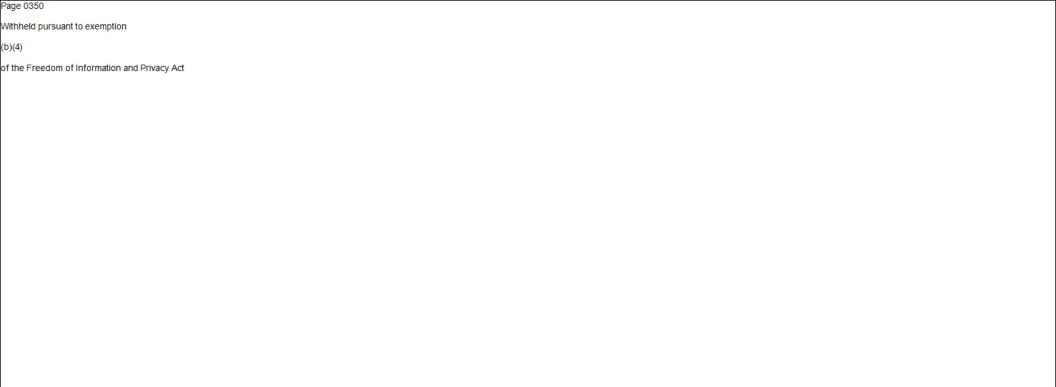


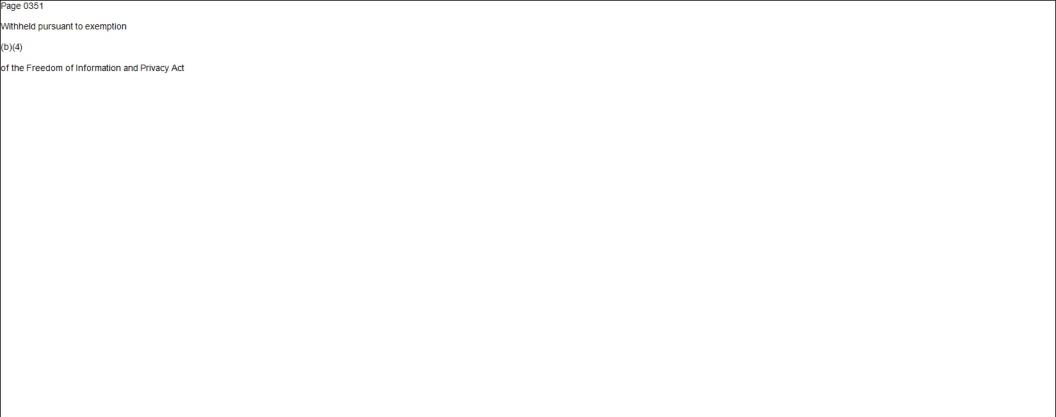


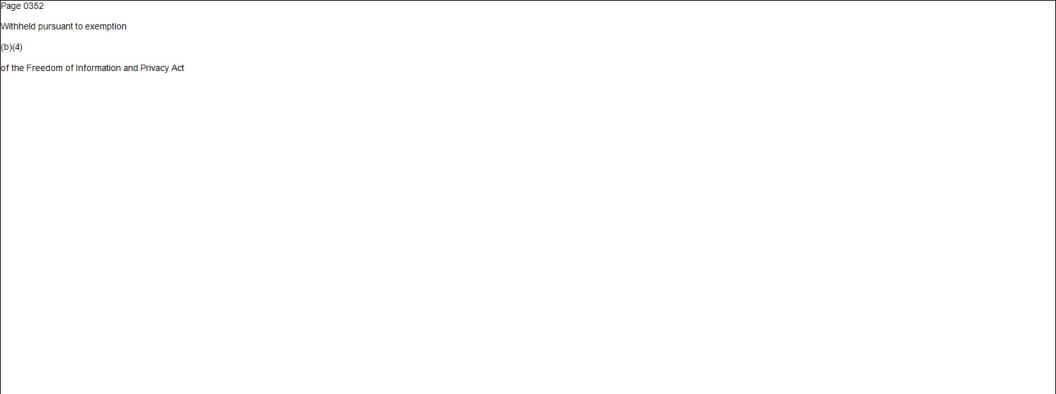


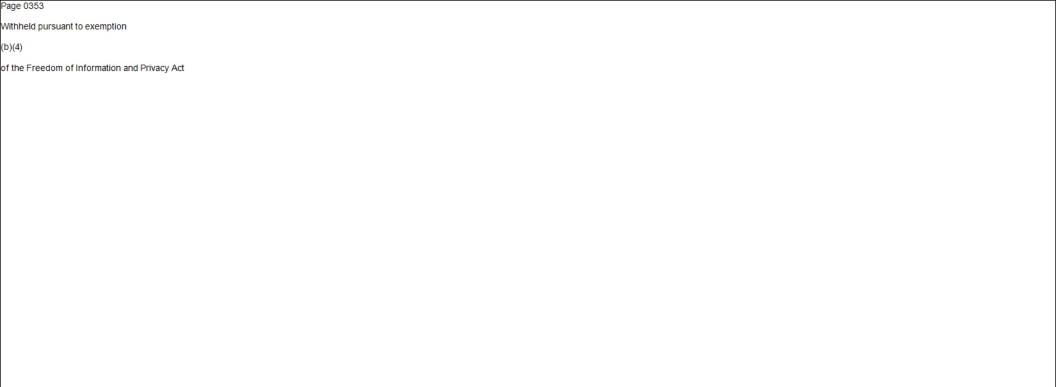




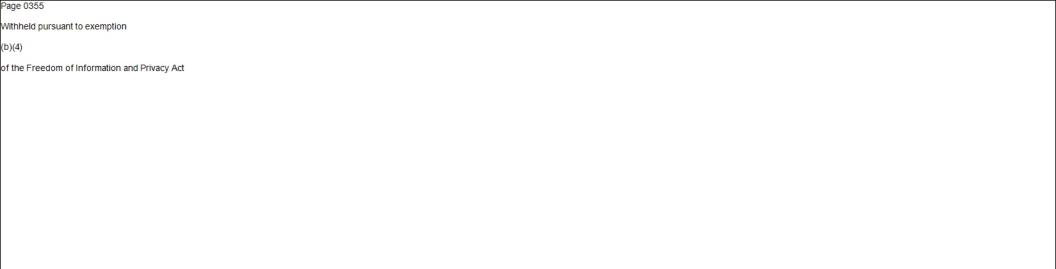






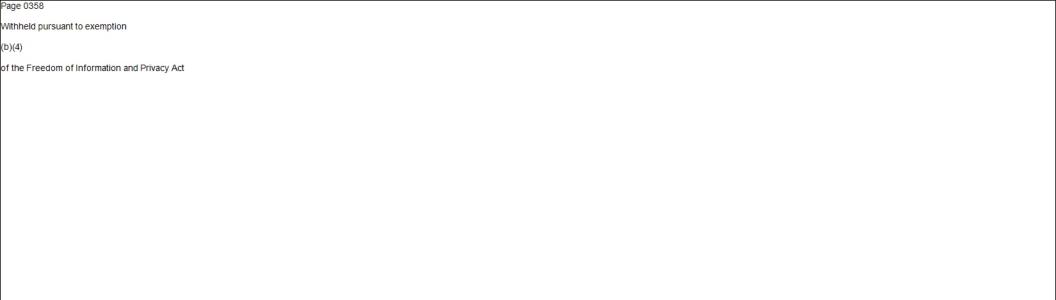






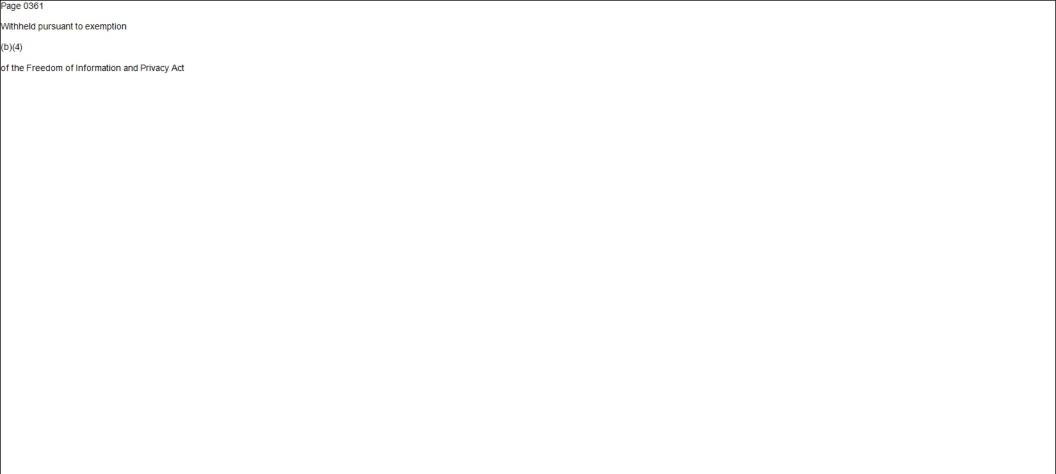




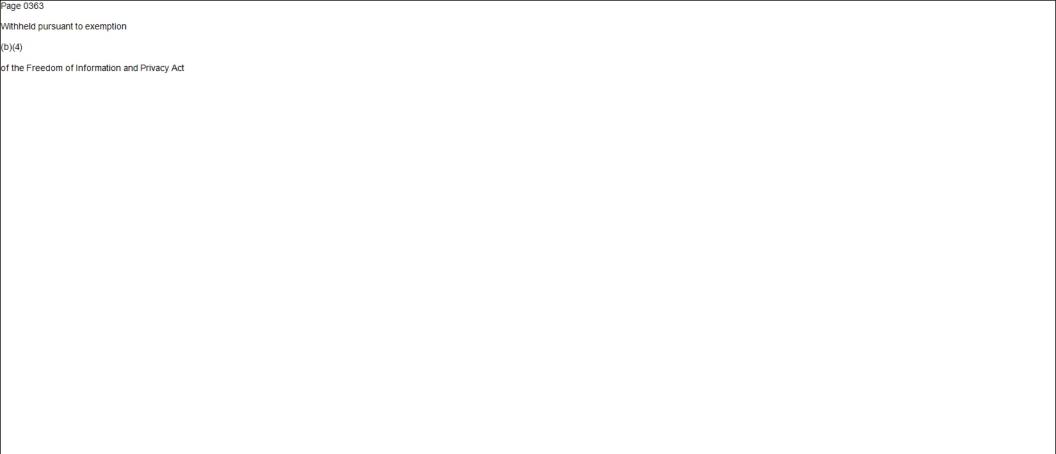




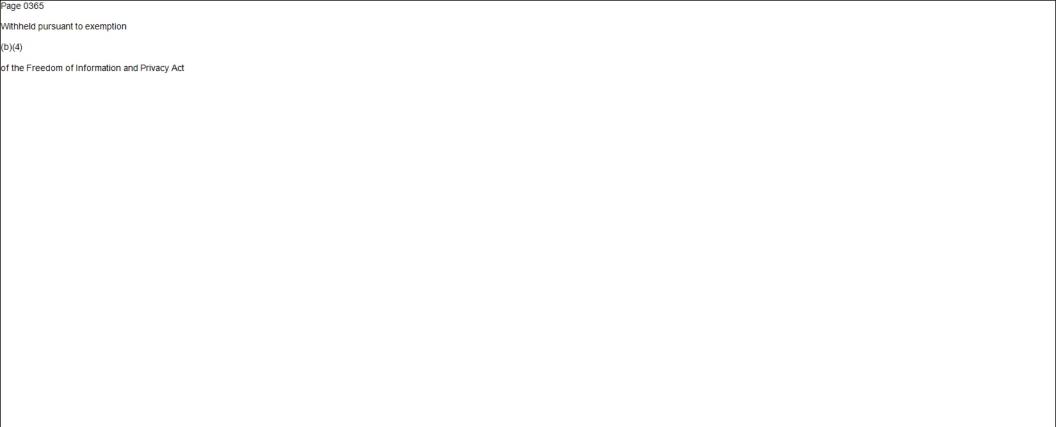


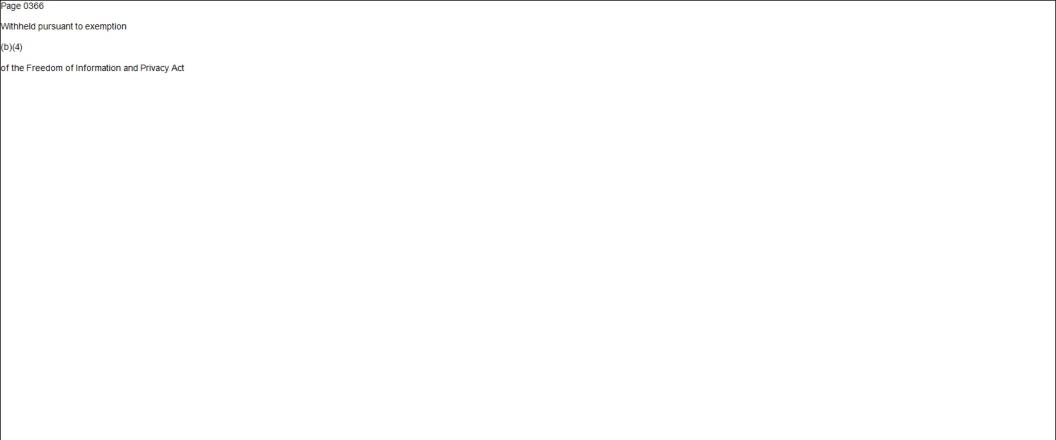




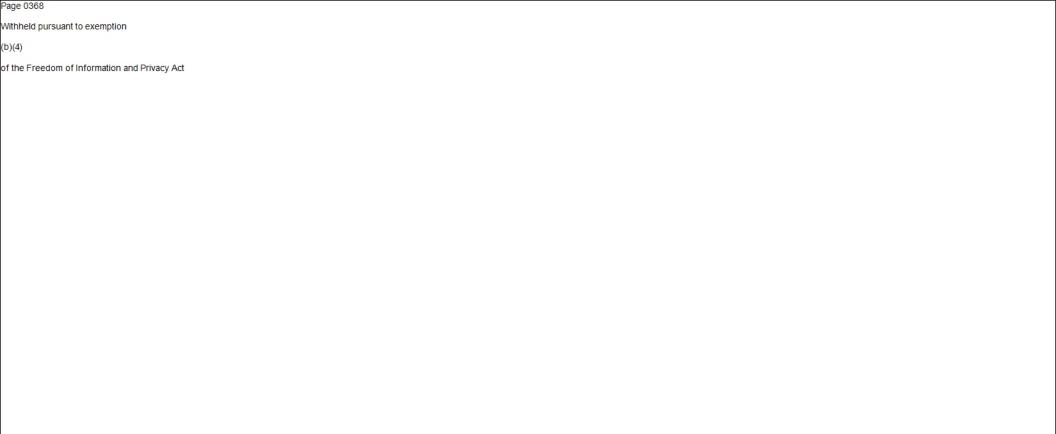
























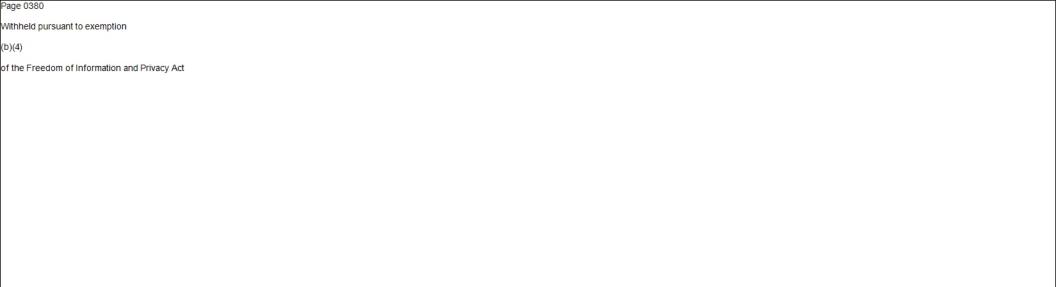




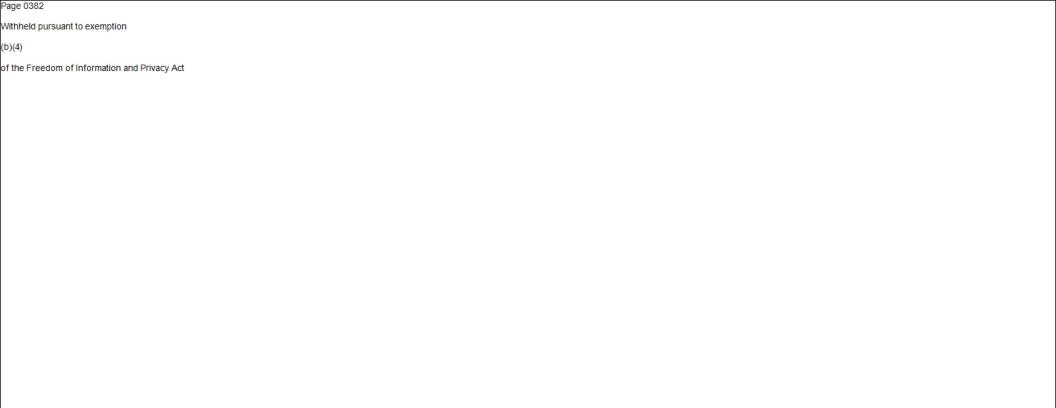






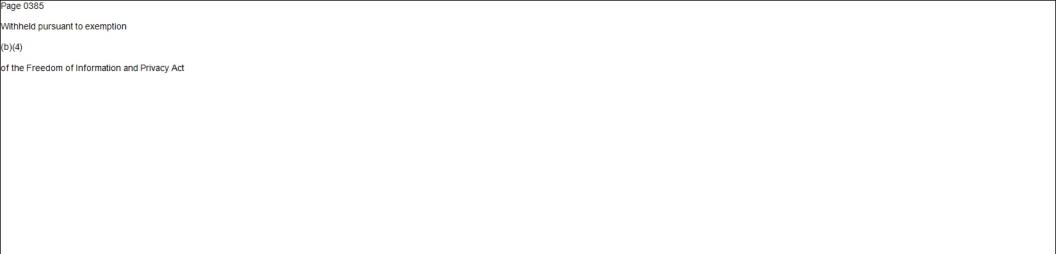


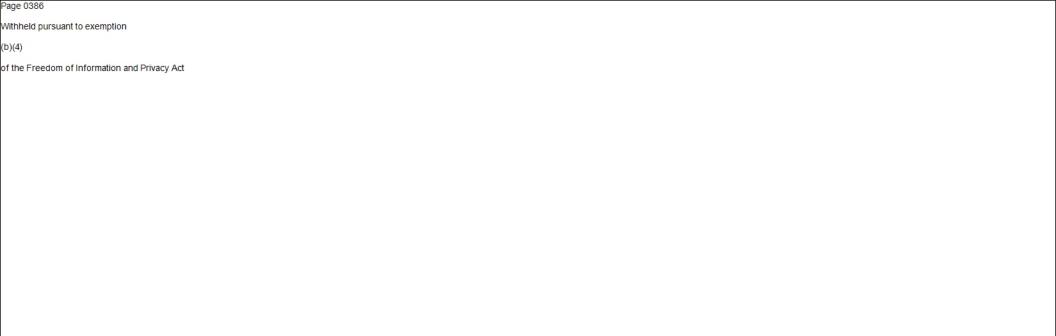








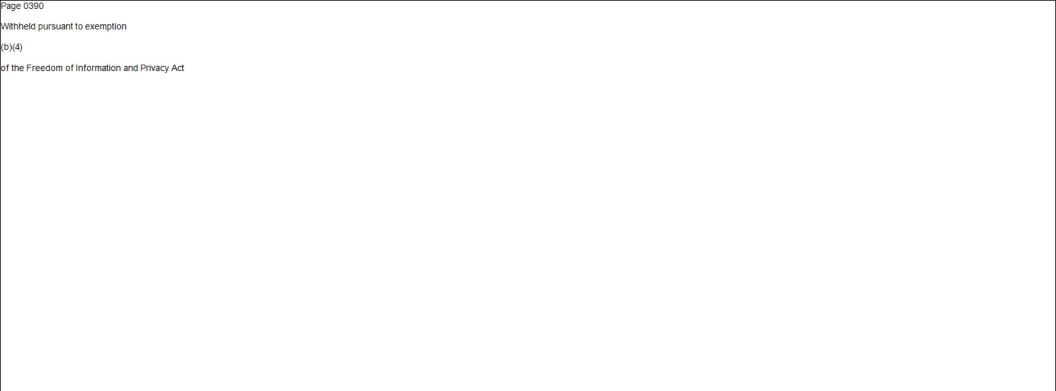








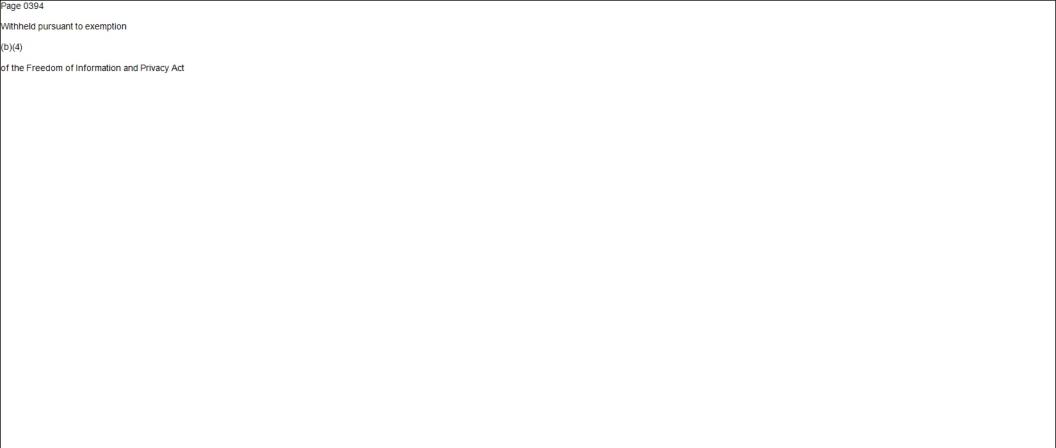


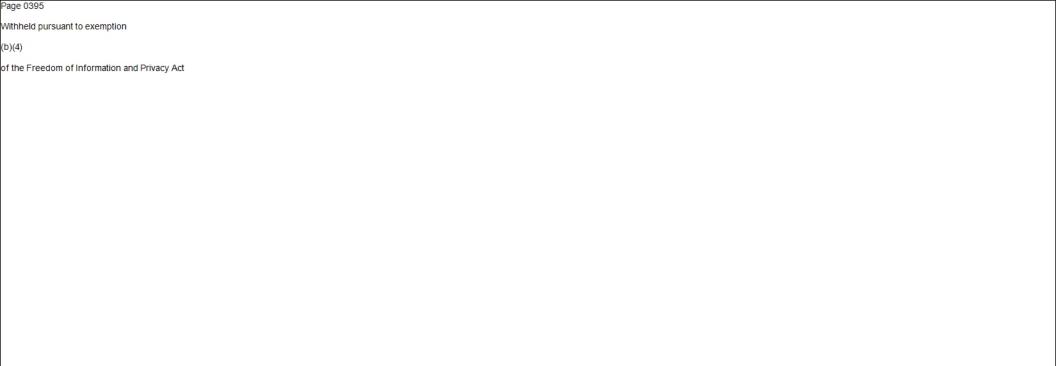






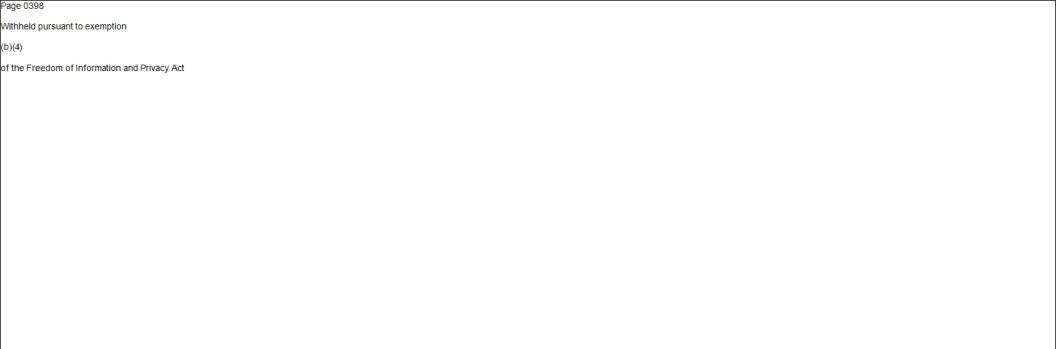


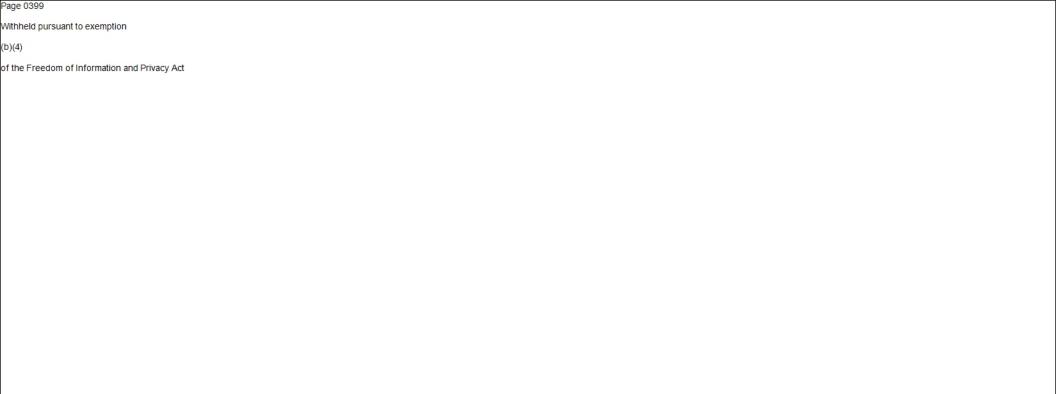












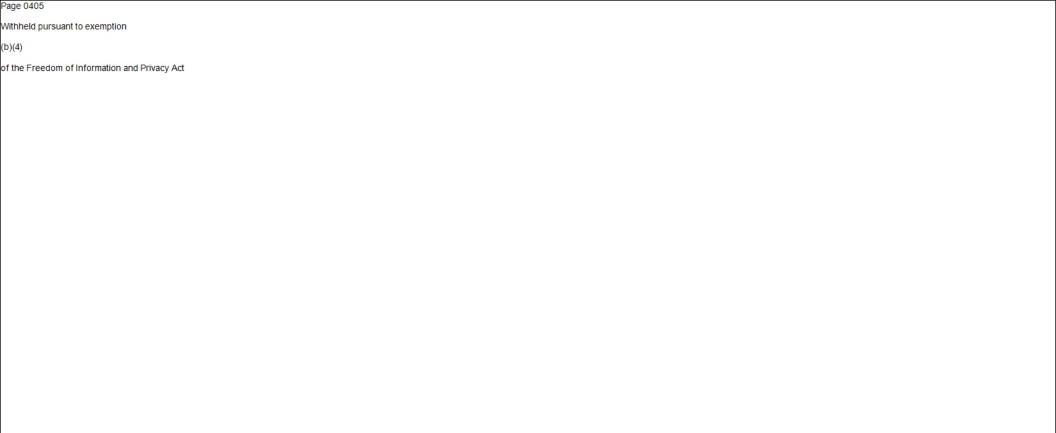




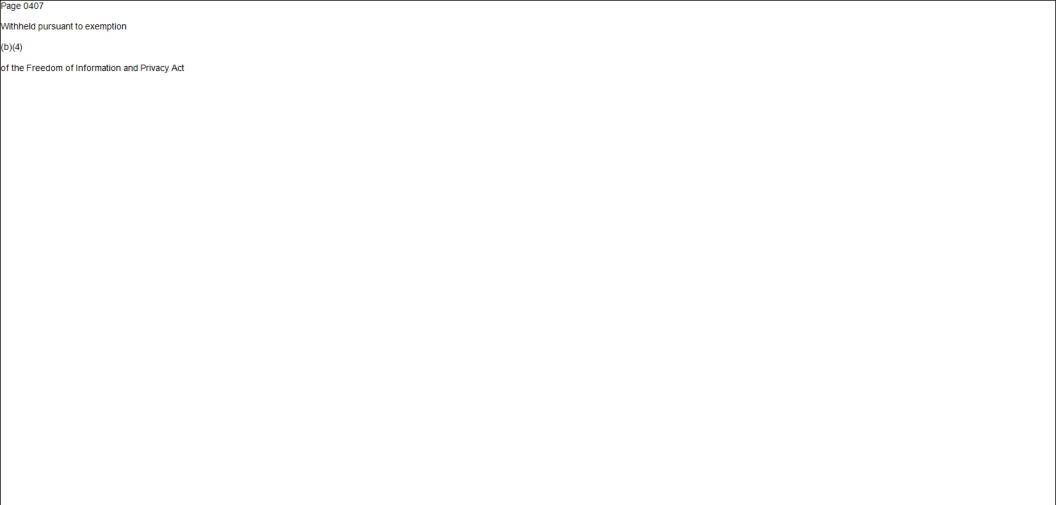








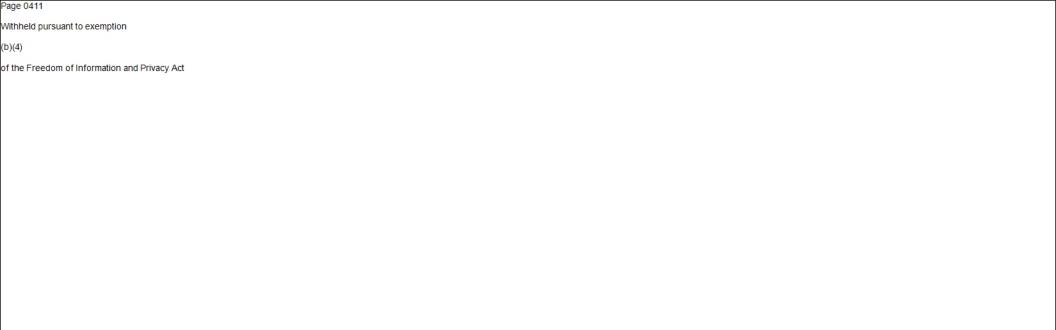














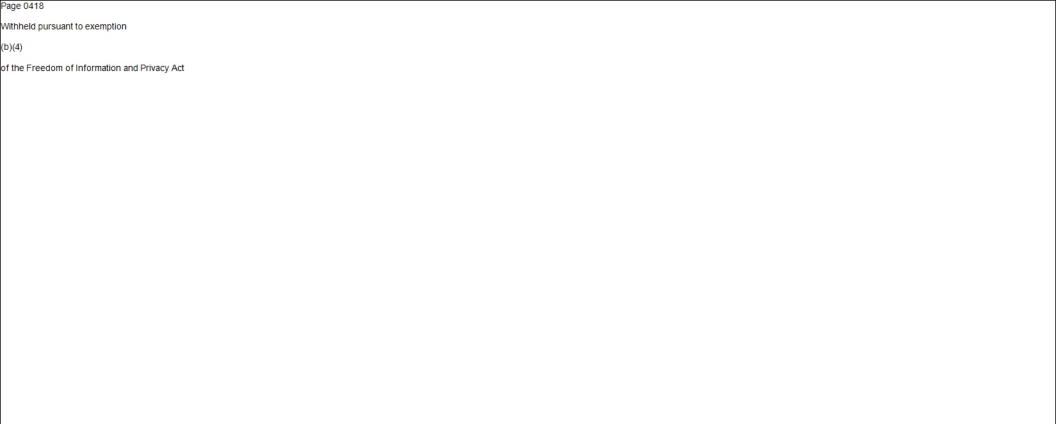
















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0474 Withheld pursuant to exemption (b)(4) of the Freedom of Information and Privacy Act

Frola, Michael

From: Frola, Michael

Sent: Wednesday, June 13, 2018 8:07 AM

To: Holland, Linda; Smith, Kathleen; Minor, Robin; Bennett, Ron; Mangold, Donna; Finley,

Steve; Menashi, Steven; Jones, Diane; Riemer, Jeffrey (Justin); Johnson, Wayne;

Smith, Kathleen; Bennett, Ron

Subject: RE: DCEH DoE Presentations

Attachments: JC - Department of Ed Presentation for June 14, 2018 - FINAL.PDF

Sorry, with attachment.

From: Frola, Michael

Sent: Wednesday, June 13, 2018 8:06 AM

To: Holland, Linda; Smith, Kathleen; Minor, Robin; Bennett, Ron; Mangold, Donna; Finley, Steve; Menashi, Steven; Jones,

Diane; Riemer, Jeffrey (Justin); Johnson, Wayne; Smith, Kathleen; Bennett, Ron

Subject: RE: DCEH DoE Presentations

Good morning,

Please see attached abbreviate DCEH Presentation that Shelly Murphy sent me last night. Also, please note the additional DCEH requests on slide 19.

Thanks, Mike

From: Holland, Linda

Sent: Tuesday, June 12, 2018 9:07 AM

To: Smith, Kathleen; Minor, Robin; Frola, Michael; Bennett, Ron; Mangold, Donna; Finley, Steve; Menashi, Steven; Jones,

Diane; Riemer, Jeffrey (Justin); Johnson, Wayne; Smith, Kathleen; Bennett, Ron

Subject: FW: DCEH DoE Presentations

See attached.

From: Frola, Michael

Sent: Tuesday, June 12, 2018 9:05 AM

To: Holland, Linda

Subject: FW: DCEH DoE Presentations

Good morning Linda,

Please share the attached presentation and Closure Plan with Department staff participating on Thursday's call with Dream Center.

Thanks.

Mike

From: Murphy, Shelly M. [mailto:smurphy@dcedh.org]

Sent: Tuesday, June 12, 2018 12:03 AM

To: Frola, Michael

Cc: Richardson, Brent D.; Shelly Murphy **Subject:** Fwd: DCEH DoE Presentations

Hi Mike,

Please find attached DCEH presentation for Thursday's meeting. Please let me know if you have any questions. Looking forward to our discussions on Thursday.

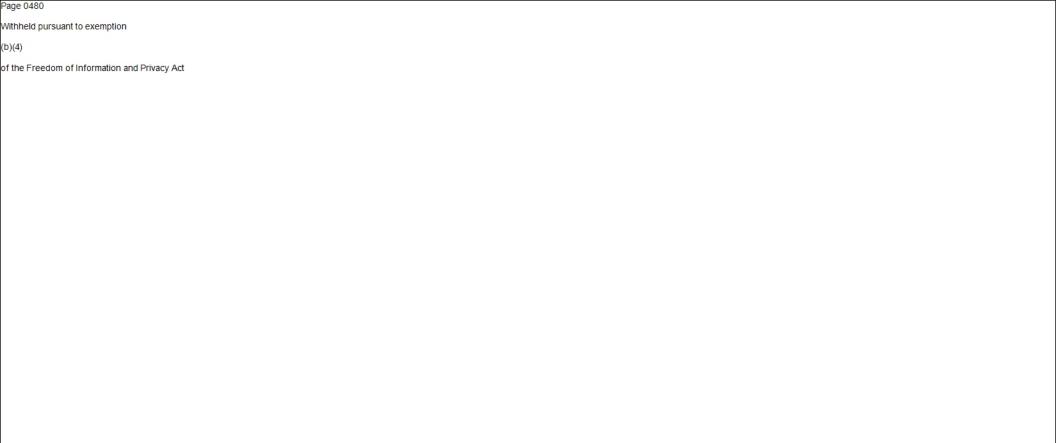
Shelly Murphy
Dream Center Education Holdings
Regulatory and Government Affairs
(b)(6)

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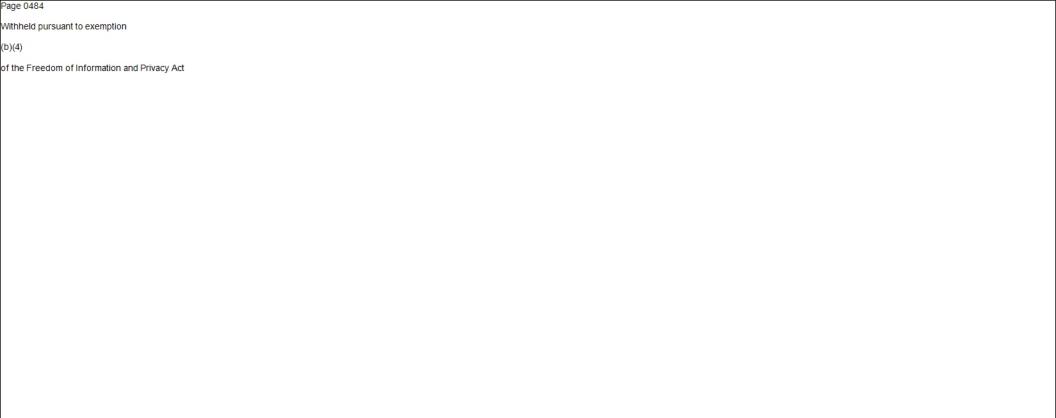




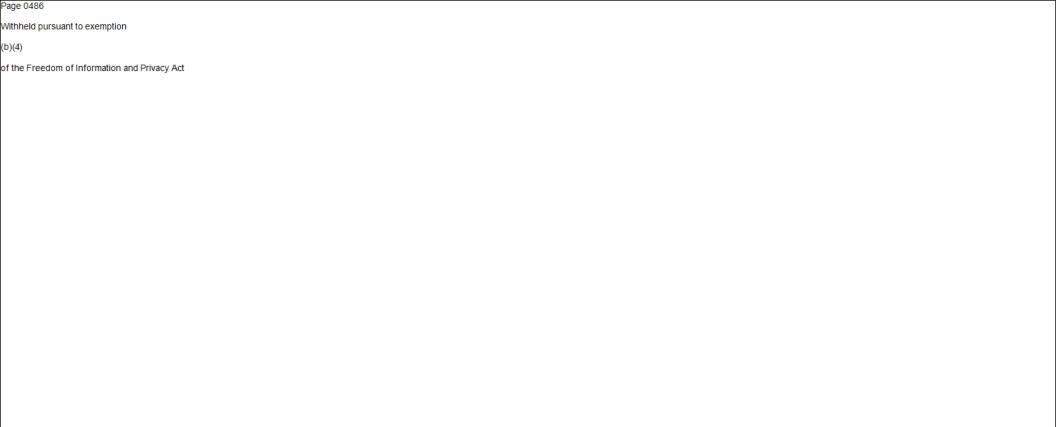






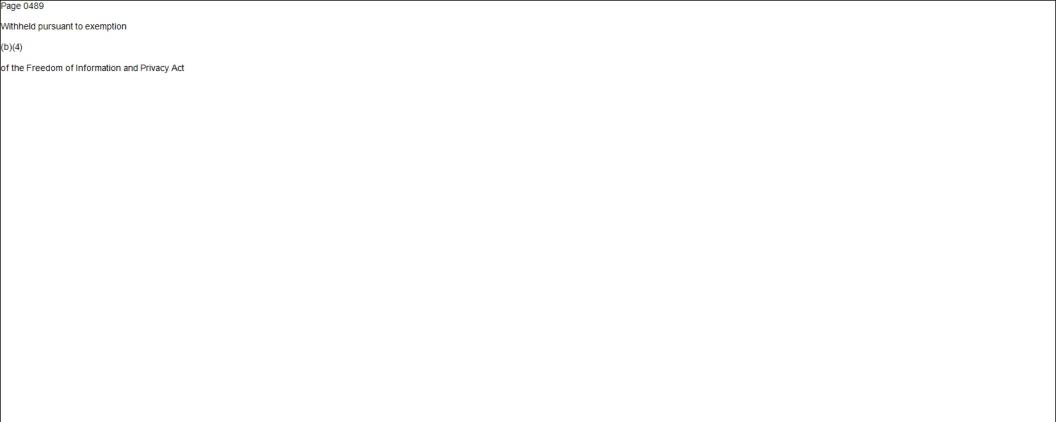




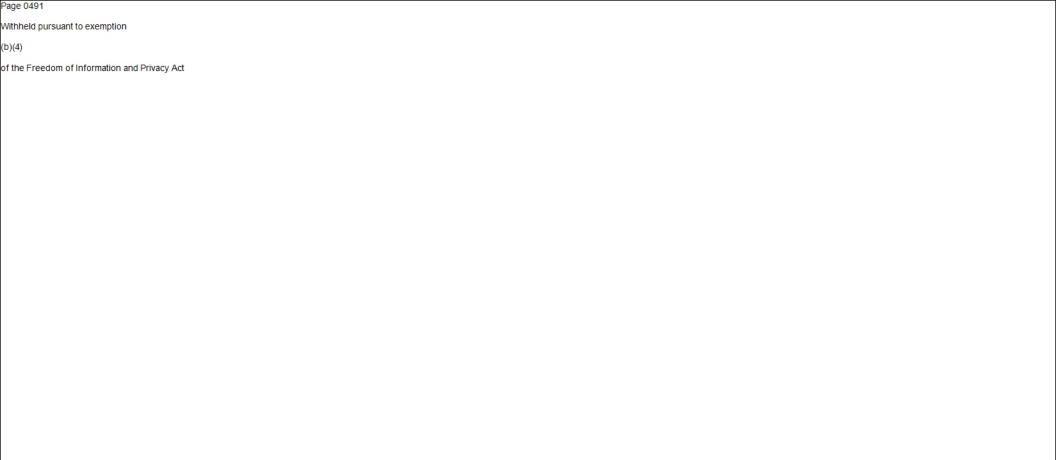




















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Page 0500

Withheld pursuant to exemption

(b)(4)

of the Freedom of Information and Privacy Act