

Iowa College Student Aid Commission

September 16, 2016



IowaCollegeAid.gov
Because College Changes Everything

IOWA COLLEGE STUDENT AID COMMISSION

Guiding Statements

Our Vision

All Iowans can achieve an education beyond high school.

Our Mission

We advocate for and support Iowans as they explore, finance and complete educational opportunities beyond high school to increase family and community success.

Our Motto

Because college changes everything.

Our Guiding Principles

- Put students first
- Respect and honor the dignity of each other and all those we serve
- Uphold the public trust
- Create and nurture internal and external partnerships that benefit our customers
- Provide services to our customers that exceed expectations and address their changing needs
- Develop and empower a motivated, compassionate, professional and accountable team
- Utilize evidence-based decision making

IOWA COLLEGE STUDENT AID COMMISSION

A G E N D A

**September 16, 2016
10:00 a.m.**

Iowa College Student Aid Commission Conference Room

- 1. Executive Director’s ReportTab A Misjak**
- *2. Minutes of Meeting July 15, 2016Tab B Misjak**
- *3. Minutes of Meeting September 1, 2016Tab C Misjak**
- *4. Administrative RulesTab D Leeper**
- *5. ITT Tech Postsecondary Registration.....Tab E Small**
- *6. Committee Reports.....Tab F**
 - Audit and Finance Committee..... Commissioner Wells**
 - Legislative Committee Commissioner Ash**
- 7. Commissioner Report.....Commissioner Moore**
- 8. Staff ReportsTab G**
 - Administrative Budget/Expenditure Summary.....May**
 - Condition of Higher Education.....Ingleby**
 - Postsecondary Registration.....Small**
 - GEAR UP Iowa.....Luwerke**
- 9. Adjournment**

*** Indicates Action Item**

UPCOMING MEETING DATE:

November 18, 2016 January 20, 2017 March 17, 2017 May 19, 2017

IOWA COLLEGE STUDENT AID COMMISSION

Executive Director's Report September 2016

Iowa College Aid at the Iowa State Fair

Iowa College Aid hosted a booth in the Varied Industries Building at the Iowa State Fair. We gave away color-changing pencils and offered blinking bracelets or earbuds in exchange for completion of a “College Passport”—an activity designed to get visitors to look for other education-related booths. The passport also encouraged participants to like or follow us on social media. During the 11 days of the fair, we saw a 17% increase in social media engagement. The Facebook increase was an impressive 54%, and the numbers have continued to tick up. More than 300 people requested copies of “Your Course to College,” which will be distributed in the next few weeks. We also gave away brochures on loans, loan repayment, applying for financial aid, and scholarships and grants that we administer, along with “Planning for Our Future,” a saving and investing guide for families.

Help navigating the final year of high school

Students are back in school, and our resources are on the way to high school seniors and their advisers. In addition to “Your Course to College,” we mailed College Application Campaign kits to nearly 80 participating Iowa high schools. These kits contain promotional posters, “I Applied” stickers, “College Bound” car clings and signs that encourage students to ask teachers and faculty where they went to college. The College Application Campaign is the first step in our 3-Step Process. Next up is the FAFSA Completion Initiative. A packet that goes to every high school in the state will include posters promoting the new FAFSA opening date (October 1), as well as samples of our free publications. Through these packets, we’re still encouraging schools to sign up for the 3-Step Process.

GEAR UP Iowa

GEAR UP Iowa is entering its third grant year, which means our cohort of students are 9th graders! This year, the program will serve every 9th grade student in all 26 public schools in the 12 districts (Cedar Rapids, Clinton, Columbus Junction, Davenport, Denison, Des Moines, Fort Dodge, Ottumwa, Marshalltown, Perry, Sioux City, Storm Lake) to serve over 7,000 students. GEAR UP Iowa works directly with partner school districts to implement programming and services to ensure students graduate from high school with the college and career knowledge to ensure their access to and success in the postsecondary education of their choice. In addition to the scholarship which will be available for all of these students, the program works with schools to develop implementation plans through the GEAR UP Iowa framework, which establishes the

support every student will receive in six different emphasis areas proven essential to student success, as well as targeted support for specific students and groups. The Framework addresses: Academic Support, Advising, College and Career Exposure, College Application and Enrollment, Family Knowledge and Engagement, and Noncognitive Skills. This year, we were also able to add school-based staff in many of our schools, including Des Moines, Cedar Rapids and Davenport. These dedicated staff will work to ensure that programming and services are implemented, documented and support the greater sustainability of these efforts.

National GEAR UP Week is September 19-23, an opportunity to spread the word about the effectiveness and importance of GEAR UP programs in our state and across the nation. During that week, staff will be working with school staff to conduct special activities and showcase GEAR UP, our schools, staff and families. The entire week will kick-off with Governor Branstad's signing a GEAR UP Week proclamation at a press conference at the Capital. The event will feature GEAR UP students, parents and school staff, as well as remarks by the Governor and Executive Director Misjak.

**IOWA COLLEGE STUDENT AID COMMISSION
MINUTES OF MEETING
July 15, 2016
10:00 a.m.**

Members Present:

Janet Adams	Amy Brace
Crystal Ford	Katie Mulholland
Herman Quirnbach	Doug Shull
Jeremy Varner	Karolyn Wells
Cindy Winckler	

Members Absent:

Michael Ash	Roger Claypool
Tedd Gassman	Frederick Moore
Tim Kraayenbrink	

Staff Present:

Todd Brown	Jethro DeLisle
Julie Leeper	Kris May
Karen Misjak	Elizabeth Sedrel
Carolyn Small	Ashley Wendt

AG Present:

Sara Scott

Guests Present:

Matt Brown	Iowa Student Loan
Angela Carlson	Capri College

Call to Order

The Iowa College Student Aid Commission met for a regularly scheduled meeting on July 15, 2016 via telephone conference call. Commission Chair Adams called the meeting to order at 10:01 a.m.

Executive Director's Report

Ms. Misjak announced that Iowa College Aid received an AmeriCorps Grant from the Iowa Commission on Volunteer Service. This is a one year planning grant that will allow Iowa College Aid to provide direct services to students and their families. Staff plans to place AmeriCorps members in our current LCAN communities. The core activities performed during the second phase will include program activities interventions by looking at resources to help students and communities to increase college attainment rates.

Ms. Misjak said currently Iowa College Aid has issued fourteen grants to nine LCAN communities and two more applications have been received and are under review. She shared that staff have recently met with Davenport and they are planning to turn a Lumina Grant into an LCAN and staff will be helping to strengthen their initiative through the collective impact framework. Ms. Misjak said staff has not had to reach out to communities as word of mouth is spreading and communities are asking for assistance. Staff are meeting with these communities and helping them develop baseline data to track progress toward Governor Branstad's 70% by 2025 college attainment goal.

A notification from the US Department of Education was received regarding a review of a national accrediting agency of mostly for-profit career and vocational schools, the Accrediting Council for Independent Colleges and Schools (ACICS). Ms. Misjak said the USDE has until late September to rule on the future of this accrediting agency and ACICS accredits two schools registered in Iowa, ITT Technical Institute and Brown Mackie College. Staff believes it will impact 250 students in Iowa.

Ms. Misjak shared a copy of the 2016 Condition of Higher Education Report published every other year. She requested Commissioners to share this report with their colleagues. Ms. Misjak said staff would be willing to make presentations on the report upon requests.

Minutes of Meeting

Motion: Commissioner Shull moved to approve the meeting minutes for May 20, 2016 as written. Commissioner Wells seconded the motion which passed unanimously.

Administrative Rules

Motion: Commissioner Varner moved to propose amendments to Administrative Rules Chapter 8 – *All Iowa Opportunity Scholarship* and Chapter 35 – *Teacher Shortage Loan Forgiveness Program*. Commissioner Mulholland seconded the motion which passed unanimously.

Motion: Commissioner Mulholland moved to propose amendments to Administrative Rules Chapter 21 – *Postsecondary Registration*. Commissioner Varner seconded the motion which passed unanimously.

GEAR UP Trust Disbursement

Mr. Brown reported on the GEAR UP scholarship stating that this is the 3rd year for disbursements. A total of 2900 students received awards totaling \$11,000,000. This includes summer term disbursements. Commissioner Winckler said she is glad these students are receiving funds for their summer term and how important it is since they do not receive Pell Grants.

Motion: Commissioner Wells moved to authorize staff to draw down up to \$6 million from the GEAR UP 1.0 Scholarship Trust account managed by Banker's Trust for scholarships to GEAR UP students during the 2016-17 academic year. Commissioner Brace seconded the motion which passed unanimously.

Human Resources and Nominations Committee

Motion: Commissioner Brace moved to nominate Commissioner Janet Adams as Chair of the Commission for FY 2017 and Commissioner Karolyn Wells as the Vice Chair of the Commission for FY 2017 and to accept the committees as presented. Commissioner Mulholland seconded the motion which passed unanimously.

Legislative Committee

Ms. Leeper said the Legislative Committee spent time looking at the Administrative Rules and no other action is needed at this time.

Audit and Finance Committee

Ms. May provided the update following the Audit and Finance Committee meeting that occurred earlier in the week. She said the committee reviewed and discussed the FY 2016 financials and fund balances. The outstanding state loan portfolio, collection procedures and the issue that staff currently does not have the authority to write off any portion of a state loan or any loan we hold was also discussed. Ms. May said the committee recommended that code language be drafted to allow staff to write off loans held by Iowa College Aid, which will include both state loans and Partnership Loan Program. Ms. May said the committee was also updated on the 7 year financial plan, with work beginning with SL Capital Strategies since the fiscal year has ended. The Audit and Finance Committee will work through this process with staff and the plan will be presented during the November Commission Meeting.

Staff Reports

Ms. May provided an update of FY2016 year-to-date financials.

Ms. Small provided an update on the Postsecondary Registrations that have been approved since the May 2016 Commission Meeting.

Commissioner Quirnbach would like a presentation on the Condition of Higher Education at the September Commission Meeting.

Commission adjourned at 10:38 a.m.

JANET ADAMS, CHAIR

CRYSTAL FORD, VICE CHAIR

**IOWA COLLEGE STUDENT AID COMMISSION
MINUTES OF MEETING
September 1, 2016
4:00 p.m.**

Members Present:

Janet Adams
Crystal Ford
Doug Shull
Karolyn Wells

Michael Ash
Katie Mulholland
Jeremy Varner
Cindy Winckler

Members Absent:

Amy Brace
Frederick Moore
Tim Kraayenbrink

Roger Claypool
Tedd Gassman
Herman Quirmbach

Staff Present:

Karen Misjak
Christina Sibouih

Elizabeth Sedrel
Ashley Wendt

AG Present:

Emily Willits

Guests Present:

Matt Brown
Angela Carlson
Dave Epley

Iowa Student Loan
Capri College
Legislative Services Agency

Call to Order

The Iowa College Student Aid Commission met for a special meeting on September 1, 2016 via telephone conference call. Commission Chair Adams called the meeting to order at 4:00 p.m.

FAFSA Media Campaign

Ms. Sibouih said a core component of Iowa College Aid's CACG- funded programming focuses upon outreach activities around the Free Application for Federal Student Aid (FAFSA). Staff has identified a targeted outreach campaign through a variety of media to raise awareness about the FAFSA and the new changes regarding the early filing and utilization of tax information from the 2015 tax year which is what allows the early filing. Ms. Sibouih said staff is requesting Commissioners to authorize the Executive Director to contract with Amperage Marketing for the production and media placement of a targeted FAFSA media campaign to run prior to October 1, 2016. The cost for this project is \$97,961.14.

Motion: Commissioner Shull moved to authorize the Executive Director to contract with Amperage Marketing for the production and media placement of a targeted FAFSA media campaign to run prior to October 1, 2016. Commissioner Mulholland seconded the motion which passed unanimously.

Commission adjourned at 4:12 p.m.

JANET ADAMS, CHAIR

KAROLYN WELLS, VICE CHAIR

IOWA COLLEGE STUDENT AID COMMISSION

Administrative Rules September 2016

RECOMMENDED ACTIONS:

Move to adopt amendments to *Administrative Rules Chapter 12 – Iowa Tuition Grant Program, Chapter 17 – Barber and Cosmetology Arts and Sciences Tuition Grant Program, and Chapter 20 – National Guard Educational Assistance Program.*

The proposed amendments to Chapters 12 and 17 change the date by which a college or university must apply for participation in the Iowa Tuition Grant and Barber and Cosmetology Arts and Sciences Tuition Grant Programs as a result of the change in the release of the Free Application for Federal Student Aid (FAFSA). The amendments also clean up language with respect to submission of employee information and ensure that disbursement of funding is aligned with need under the Barber and Cosmetology Arts and Sciences Tuition Grant Program.

The proposed amendment to Chapter 20 allows students at colleges and universities that grant credit based on terms other than semesters to receive equivalent benefits as students at colleges and universities that award based on semester terms.

Both rules are identical to the Notices of Intended Action published on June 22, 2016.

COLLEGE STUDENT AID COMMISSION[283]

Adopted and Filed

Pursuant to the authority of Iowa Code section 261.3, the Iowa College Student Aid Commission hereby adopts amendments to Chapter 12, "Iowa Tuition Grant Program," and Chapter 17, "Barber and Cosmetology Arts and Sciences Tuition Grant Program," Iowa Administrative Code.

The amendment to Chapter 12 changes the date by which a college or university must apply for participation in the Iowa Tuition Grant Program. The change is necessary due to the federal Department of Education's change in the release of the Free Application for Federal Student Aid (FAFSA) and the importance of information received from the FAFSA in projecting future awards under the state program.

The amendments to Chapter 17 update language with respect to the submission of employment information, change the date by which a college must apply for participation in the Barber and Cosmetology Arts and Sciences Tuition Grant Program due to the federal Department of Education's change in the release of the FAFSA, and ensure that the disbursement of funding is aligned with need.

Notice of Intended Action was published in the Iowa Administrative Bulletin on June 22, 2016, as ARC 2582C. This adopted rule is identical to that published under Notice of Intended Action.

The Commission does not intend to grant waivers under the provisions of these rules.

After analysis and review of this rule making, the Commission finds that there is no impact on jobs.

These amendments are intended to implement Iowa Code chapter 261.

The following amendments are proposed.

ITEM 1. Amend subrule 12.2(2) as follows:

12.2(2) *Processing college and university applications.* Application forms will be provided by the commission.

Applicant colleges and universities are required to provide the commission with documentation establishing eligibility as described in 12.2(1).

Colleges and universities seeking to participate in the Iowa tuition grant program must submit applications by ~~January 1~~ October 1 of the year prior to the beginning of the academic year for which they are applying for participation.

Applicant colleges and universities must submit written plans outlining academic programs that integrate summer attendance in accelerated programs prior to making summer awards. If the summer program is approved by the commission, an applicant's students may receive Iowa tuition grants beginning in the summer following approval. Academic programs, defined by colleges or universities, which allow students to complete four-year baccalaureate programs in less than the normal prescribed time period while taking the same courses as students completing the same degree during a traditional four-year time period will be approved. A summer academic program may be defined for a group of students or may be a self-directed program in which a student has received approval from appropriate officials of the college or university.

ITEM 2. Amend paragraph **17.2(1)"f"** as follows:

f. Submit an annual report which includes student and faculty information, enrollment and employment information, and other information required by the commission as described in Iowa Code ~~sections section~~ 261.9 ~~through 261.16~~; and

ITEM 3. Amend paragraph **17.2(2)"b"** as follows:

b. Colleges seeking to participate in the barber and cosmetology arts and sciences tuition grant program must submit applications by ~~January 1~~ October 1 of the year prior to the beginning of the academic year for which they are applying for participation.

ITEM 4. Adopt the following **new** paragraph **17.2(4)"c"**:

c. If a school does not expend its entire allocation, the unspent funds must be returned to the commission.

The school's allocation for the following fiscal year will be reduced by the amount of the unspent allocation.

COLLEGE STUDENT AID COMMISSION[283]

Adopted and Filed

Pursuant to the authority of Iowa Code section 261.3, the Iowa College Student Aid Commission hereby adopts amendments to Chapter 20, "Iowa National Guard Educational Assistance Program," Iowa Administrative Code.

The proposed amendment to Chapter 20 allows students at colleges and universities that grant credit based on terms other than semesters to receive equivalent benefits as students at colleges and universities that award credit based on semester terms. The proposed amendment to Chapter 20 reflects changes to Iowa Code section 261.86 that were enacted in 2016 Iowa Acts, Senate File 2234.

Notice of Intended Action was published in the Iowa Administrative Bulletin on June 22, 2016, as ARC 2583C. This adopted rule is identical to that published under Notice of Intended Action.

The Commission does not intend to grant waivers under the provisions of these rules.

After analysis and review of this rule making, the Commission finds that there is no impact on jobs.

This amendment is intended to implement Iowa Code chapter 261 as amended by 2016 Iowa Acts, Senate File 2234.

The following amendment is proposed.

Amend paragraph **20.1(6)“c”** as follows:

c. A qualified student may receive benefits for no more than 120 semester credit hours, or the equivalent, of undergraduate study. All credit hours within a term of enrollment to which educational assistance was applied must be reported to the commission within the state-defined payment period.

IOWA COLLEGE STUDENT AID COMMISSION

ITT Technical Institute Application for Postsecondary Registration Renewal September 2016

RECOMMENDED ACTION: Approve ITT Technical Institute's request to renew its Iowa registration for a two-year term that begins retroactively on May 19, 2016, and ends on May 19, 2018, in order to provide continuing instruction to currently enrolled students.

Registration Purpose

Revised Iowa Code Sections 261B.2 (definitions) and 261B.3 (effective July 1, 2012) require a school to register with the Commission if a person compensated by the school conducts any portion of a course of instruction, including by in-person, distance education, or correspondence method in this state or if the school otherwise has a presence in this state. Presence means a location in Iowa at which a student participates in any structured activity related to a school's distance education course of instruction. Presence also means an address, location, telephone number, or internet protocol address in Iowa from which a school conducts any aspect of its operations.

ITT Technical Institute (the Institute) originally applied to renew its registration in order to continue providing face-to-face instruction to currently enrolled students at its campus in Clive, Iowa, and to continue providing instruction in its online programs to currently enrolled Iowans.

Need and Rationale for Transfer Arrangements or Teach-Out Plans

It is in the best interests of the Institute's Iowa students to identify transfer or teach-out options at other institutions as soon as possible in response to four recent developments.

Issue #1: The institution's accrediting agency, the Accrediting Council for Independent Colleges and Schools (ACICS), is undergoing a three-step review of its recognition by the federal Department of Education. The initial two phases of this review produced a recommendation that the federal Department of Education withdraw its recognition of the accrediting agency. A decision relative to the third phase of this review process is expected from the federal Department of Education on or before September 21, 2016. If the federal Department of Education rules that recognition of ACICS should be withdrawn, ACICS is expected to immediately appeal. During the appeal process, ACICS will continue to be recognized as an accrediting agency by the federal Department of Education and ITT Technical Institute will continue to be an institution that is accredited by an agency recognized by the federal Department of Education. However, Iowa Code prohibits any school from operating in Iowa or offering programs to Iowans if it is not accredited by an accrediting agency recognized by the federal Department of Education. Thus, it became necessary for a contingency plan to be in place in the event that ACICS loses its federal recognition and, as a result, the Commission must revoke the Institute's registration authorization to continue operating in Iowa and providing instruction to Iowans who are enrolled in its programs.

Issue #2: On April 20, 2016, the institution's accrediting agency, ACICS issued a show-cause directive to the institution calling into question its administrative capability, organizational integrity, financial viability and ability to serve students in a manner that complies with the accrediting agency's standards. ACICS required the Institute to submit to ACICS specified information responding to these concerns and the Institute presented its response to ACICS during their August 4, 2016 meeting.

On August 17, 2016, ACICS continued its show-cause directive until the next ACICS Council meeting in December 2016. ACICS directed the Institute to submit additional information that includes its efforts to remedy compliance issues raised by state consumer protection oversight entities and its efforts and results to resolve the CFPB investigation. In addition, ACICS required the Institute to present an updated operational plan that includes a listing by campus (including online programs) of comparable programs offered at other institutions in case teach-out agreements or transfer arrangements would be needed.

Issue #3: On August 25, 2016, the federal Department of Education announced additional conditions on the Institute's participation in the federal student aid programs:

- The federal Department of Education required ITT Technical Institute to provide a surety in the form of an Irrevocable Letter of Credit or cash for five years from the date it was cited (August 19, 2014) for failure to timely submit audited financial statements to the Department. In its August 25, 2016 letter, the Department required the Institute to increase the amount of its surety to \$247.3 million.

Under an agreement with the federal Department of Education dated July 6, 2016, the Institute was permitted to provide additional cash surety in the amount of \$43 million in three installments of \$14.6 million due on July 20, 2016, September 30, 2016, and November 30, 2016, for a total of \$94.4 million. However, the federal Department of Education accelerated payment on the two remaining installment payments, and increased the surety by an additional \$152.9 million, all of which is now due 30 days from the date of the Department's August 25th letter.

- Effective immediately, all ITT Technical Institutes are required to make all Title IV Program fund disbursements under the Heightened Cash Monitoring 2 (HCM2) payment method, which requires the Institute to make disbursements to students from its own institutional funds. Then, the Institute must submit a request for reimbursement of those funds to the federal Department of Education that includes student eligibility records for the Department's review. The federal Department of Education's reimbursement may be delayed by at least four weeks, which is the timeframe the federal Department of Education establishes for review of the school's student eligibility records.

Issue #4: On September 6, 2016, the Institute announced that it would discontinue instruction in any campus-based program, and would cease offering instruction in its online programs effective on the ending date of the current online program term, October 16, 2016. The Institute has clearly stated its intent to cease all operations. The Institute's accrediting agency, ACICS, issued a letter dated September 8, 2016, confirming that the Institute remains accredited through the date it expects to completely cease instruction.

As of September 6, there were 23 students enrolled at the Clive campus who are unable to complete their programs. As of the date that the Institute will cease offering instruction in its online programs (October 16, 2016), there will be 14 students enrolled who will be unable to complete their programs.

Staff and ITT Technical Institute have already initiated a cooperative effort to develop institution-specific transfer or teach-out agreements to provide contingencies for Iowa residents who will be unable to complete both the Institute's on-campus and online programs. That work will continue until the possibilities for identifying interested institutional partners are exhausted. ITT Technical Institute has requested and received assistance from staff in identifying potential partner schools.

Registration Application and Institutional Compliance Review

Institutional Information

ITT Technical Institute is a for-profit postsecondary educational institution that provides programs via in-person instruction at 1860 NW 118th Street, Suite 110, Clive, Iowa 50325. Distance education programs that the Institute offers to Iowans are coordinated through the Institute's Indianapolis location, 9511 Angola Court, Indianapolis, IN 46268. The Institute's Chief Executive Officer is Kevin M Modany, 13000 North Meridian Street, Carmel, Indiana 46032. ITT is registered as ITT Educational Services, Inc., with the Iowa Secretary of State as a foreign profit corporation #47840 to conduct business in the State of Iowa. Its Iowa registered agent is CT Corporation System, 400 East Court Avenue, Des Moines, Iowa 50309. ITT's primary Iowa contact person is the Director of the Clive Campus, Dr. Keri Fahrenkrog-Nelson, 1860 NW 118th Street, Suite 110, Clive, Iowa 50325.

Ownership: ITT Technical Institute's Clive and Indianapolis campuses are two of a network of co-educational, for-profit, private postsecondary educational institutions owned and operated by ITT Educational Services, Inc., a Delaware corporation. There are two persons who own more than 10% of the school. Those are:

- Putnam Investments LLC, 1 Post Office Square, Boston, Massachusetts 02109, (617) 292-1000.
- Nantahala Capital Management LLC, 19 Old Kings Highway South, Darien, Connecticut 06820, (203) 404-1172

Management: The following individuals are the senior management team for ITT Educational Services, Inc.

- Kevin Modany – Chief Executive Officer since 2007.
- Eugene W. Feichtner – President and Chief Operating Officer since 2014. Mr. Feichtner was Executive Vice President and President, ITT Technical Institute Division, from April 2009 through July 2014.
- June M. McCormack – Executive Vice President since April 2009 and President, Online Division since 2008.
- Glenn E. Tanner – Executive Vice President, Chief Marketing Officer since April 2009.
- Rocco F. Tarasi III – Executive Vice President and Chief Financial Officer since August 2015, and Senior Vice President and President, the Center for Professional Development at ITT Technical Institute since January 2013.
- David E. Catalano – Senior Vice President, Business Development since November 2007.

- Phillip B. Frank – Senior Vice President and General Counsel since December 2012.
- Angela K. Knowlton – Senior Vice President, Controller and Treasurer since March 2010.
- Jill M. Minnick – Senior Vice President, Marketing, since February 2012.
- John Montgomery – Senior Vice President, Project Management Office since April 2013.
- Barry S. Simich – Senior Vice President, Operations since 2005.
- Shawn J. Crawford – Senior Vice President, Chief Compliance and Risk Officer since August 2014. Previously, Mr. Crawford served as Vice President of Regulatory Affairs since March 2009.

The following individuals comprise the ITT Educational Services, Inc. Board of Directors.

- John E. Dean – Executive Chairman of the Board since August 2014. Mr. Dean is an attorney who has specialized in higher education law since April 1985. He has been an ITT Educational Services Director since December 1995.
- C. David Brown – Mr. Brown is the immediate past Chairman of the Board of Trustees of the University of Florida. He has served on the ITT Educational Services board of Directors since April 2015.
- Jerry Cohen – Mr. Cohen is a retired senior partner of the independent auditing firm Deloitte & Touche, LLP, where he provided business advisory and audit services to a wide range of organizations, and worked with corporate boards of directors to develop, enhance, and support corporate strategy.
- Joanna T. Lau – Ms. Lau has served on the ITT Educational Services Board of Directors since 2003. She has experience as a chief executive officer with a management consulting and investment firm since 1990.
- Thomas L. Morgan – Mr. Morgan has served on the ITT Educational Services Board of Directors since January 2013. Previously, he served as chairman and chief executive officer of a company that distributed physical and digital books and entertainment products.
- Samuel L. Odle – Mr. Odle has served on the ITT Educational Services Board of Directors since January 2006. He has experience as a consultant in the healthcare and life sciences fields, and served in leadership roles at three non-profit healthcare organizations.
- Vin Weber – Mr. Weber has been on the ITT Educational Services Board of Directors since 1994. His professional experience includes a leadership role in a public affairs and lobbying firm.

Since the vast majority of the ITT Educational Services, Inc., senior management team and the members of its Board of Directors have roles and experience that are predominantly related to the high-level administration and operation of a large educational corporation, staff requested and received from the Institute additional information about persons that assume responsibility for the Institute's academically-related decisions on a national level. In addition to the Chief Academic Officer, the Vice President for Instructional Operations, and the Director of Instructional Operations, each school of study at the Institute has a Managing Director for Instructional Operations (MDIO). The MDIO for each respective department is responsible for the oversight of curriculum for all of the ITT programs offered by that department. The following individuals have these national, academic leadership roles at ITT Technical Institute.

Dr. Dean Kempter – Vice President and Chief Academic Officer: Dr. Kempter is the Vice President and Chief Academic Officer of ITT Technical Institute. Dr. Kempter joined ITT/ESI October 11, 2004 and served as the college Director at ITT Technical Institute, Everett. Prior to ITT/ESI, Dr. Kempter was the Vice President of North American Operations at the City University of Seattle and Executive Director at the Edlearn Consortium of Washington (state) colleges and universities. He earned his Doctorate in Educational Leadership and Policy Studies from the University of Washington, M.B.A. from the City University of Seattle, and B.S. in Economics from Central Washington University. Dr. Kempter oversees academic administration and student assessment at ITT Technical Institute.

Mr. Shantanu Phadnis – Vice President, Instructional Operations: Mr. Phadnis oversees and leads the Curriculum Development Department and the Online Division's instructional operations including learning technology. Mr. Phadnis has extensive experience in education and working with digital media-enhanced learning resources, as well as developing strong relationships with our current publishers and third-party content providers. Prior to this role, Mr. Phadnis was the Director of Business Development and was responsible for new program research and development. Mr. Phadnis holds a Bachelor of Science Degree in Physics from Bombay University, India, and a postgraduate Honors Diploma in Systems Management.

Mr. Charan Jeet Singh – Director of Instructional Operations: Mr. Singh is the Director of Instructional Operations at ITT Technical Institute. In this role, he manages a team of Managing Directors of Instructional Operations for various programs of study and general education. Mr. Singh joined the Institute in 2008 as program Chair, and has since acted as School Chair, Dean, National Dean ITT/ESI and most recently as Director of Instructional Operations. Prior to starting at ITT Tech, Mr. Singh held various positions in the technology sector, specifically as staff design engineer Very Large Scale Integration (VLSI), Design Manager VLSI, Director of Product Management for Wireless LAN equipment, and Vice President of group and Product management at various technology firms such as National Semiconductor Corporation (now Texas Instruments), 3COM Corporation (now Hewlett Packard) and other Tier 1 venture backed startups. In addition to teaching at ITT Technical Institute, Mr. Singh has taught at Illinois Institute of Technology, the University of Louisiana and the University of California Santa Cruz Extension programs. Mr. Singh holds a B.S. Electrical Engineering degree from National Institute of Technology, India, and an M.S. in Electrical Engineering from Illinois Institute of Technology, Chicago. He completed a pre-medical program at West Chester University and pursued graduate studies in bio-technology at John Hopkins University.

Mr. John Carpenter – Managing Director Instructional Operations, School of Information Technology: Mr. Carpenter joined ITT Tech in June 2013 as the Online Faculty Manager for the School of Information Technology. Prior to joining ITT Tech, Mr. Carpenter served as Acting Dean for the Online School of Information Technology and Curriculum Chair for the School of Information Technology at Harrison College. Mr. Carpenter earned his M.S. in Information Technology from Southern New Hampshire University, a Master of Information Systems/Management from the University of Phoenix, and a B.S. in Computer Science from Southwest Baptist University. As Managing Director of Instructional Operations for the School of Information Technology, Mr. Carpenter guides the standard curriculum for all School of Information Technology programs and oversees the online Information Technology programs, classes, instructors, and students for the ITT Tech Online Division.

Mr. Billy Royal— Managing Director Instructional Operations, School of Business: Mr. Royal has been in the higher education sector for over nine years in the areas of academic administration, student services, and compliance. He holds a Master of Science in Management degree and is currently completing his dissertation for an Ed.D. in Educational Leadership. Prior to joining the postsecondary educational sector, Mr. Royal worked for Corporate America for Sallie Mae, as well as non-for-profit agencies such as Boys and Girls Club and the YMCA.

Mrs. Fabiola Clayton – Managing Director Instructional Operations, School of Drafting and Design: Mrs. Clayton oversees curriculum development and the operation of the Drafting and Design programs. She holds a Master's and a Bachelor's Degree in Architecture and Urban Design from University of São Paulo, Brazil, where she completed her research in the fields of Architecture and Psychology of Space on Educational settings. She also holds a specialization in Pedagogy for Higher Education from Mackenzie University in São Paulo, Brazil. Mrs. Clayton joined ITT Tech in 2010 and held positions as an instructor from 2010 to 2011; Chair from 2011 to 2013, and Dean in 2014. Prior to joining the academic leadership team at ITT Technical Institute, Mrs. Clayton was Academic Director for the School of Interior Design at The Art Institutes of Indianapolis from 2007-2009, and in 2014 she held a position as Lead Instructor for Interior Design at Sanford-Brown College (former IADT - International Academy of Art and Design) in Seattle. Mrs. Clayton is NCIDq® certified and an Autodesk's AutoCAD 2015 Professional.

Mr. Michael Lowry – Managing Director Instructional Operations, School of Electronics Technology: In this role, Mr. Lowry is responsible for the curriculum and online instructors for electronics technology, industrial engineering, mathematics, and physics. He joined ITT Tech in September 2007 as an adjunct instructor at the Indianapolis North campus. At ITT Tech, Mr. Lowry acted in the capacity of National Chair for the School of Electronics Technology before assuming his current role. Previously, Mr. Lowry was the manager of the advanced engineering department at Delphi Corporation with responsibility for the development of electric and hybrid vehicle propulsion systems for various automotive customers. Mr. Lowry is a registered professional engineer in the state of Indiana. His formal education includes a B.S. in Civil Engineering and an M.B.A. degree from the University of Minnesota and an M.S. in Electrical and Computer Engineering degree from Purdue University. He is presently completing his dissertation for the Ph.D. in electrical and computer engineering at Purdue University.

Dr. Davetta Henderson – Managing Director Instructional Operations, General Education: Dr. Davetta Henderson joined ITT Tech in June, 2012 as an adjunct faculty member and subsequently served as an online Faculty Manager. Prior to joining ITT Technical Institute, Dr. Henderson was the Associate Dean of Students at Harrison College. She earned her Doctorate in Administrator Leadership for Teaching and Learning from Walden University, a Psy.D. from California Southern University, a Master of Science degree from Martin University and a Bachelor of Arts degree from Concordia University. Dr. Henderson oversees the design and development of curricula and programs and faculty management for the General Studies division.

Dr. Sandi Owens – Director for Curriculum Design and Development: Dr. Owens joined ITT Tech in July 2012 and served as a Senior Project Manager prior to taking on her current role. Previously, Dr. Owens was a Business Project Manager, Technical Consultant, and worked in

product development at Sallie Mae. Dr. Owens earned her Doctorate in Organizational Leadership, an M.B.A. in Finance, a B.S. in Business, and a B.A. in Economics from Pepperdine University. Dr. Owens oversees the research and development of all courseware for ITT Technical Institute.

More information about the Institute's process for curriculum oversight and development, including the roles of faculty, program advisory committees, and the Institute's national curriculum committees is provided under "Curriculum Development and Evaluation" below.

Physical Facilities: ITT Technical Institute's Clive campus location is at 1860 NW 118th Street, Suite 110. The facility encompasses 14,331 square feet. Available space on two floors includes a lobby area, administrative offices, staff lounge, two computer labs, six theory rooms, four interview rooms, a learning resource center, bookstore, and ten total classrooms that accommodate a capacity of 254 students. Ample and well-lighted parking is available. The termination date for the lease is scheduled for October 11, 2019, with the option to extend the lease for an additional five years.

Accreditation: ITT Technical Institute is institutionally accredited by the Accrediting Council for Independent Colleges and Schools (ACICS), a nationally recognized accrediting agency by the federal Department of Education.

Federal Stafford Loan Cohort Default Rate (FFY 2012): 18.8%. For comparison purposes, the FFY 2012 national average cohort default rate is 11.8%.

Graduation Rate: This is the percentage of first-time, full-time undergraduate students who graduated within 150% of the normal time for program completion as reported to the federal Department of Education.

- Clive Campus: 46%
- Indianapolis, Indiana (online) Campus: 40%

Average Loan Debt upon Graduation: ITT reported a median loan debt, as required by the federal Department of Education, for Iowa program graduates during the 2015 reporting period, as follows:

- Associate of Science in Criminology and Forensic Technology: \$24,791
- Associate of Science in Drafting and Design Technology: \$16,143
- Associate of Science in Electrical Engineering Technology: \$24,419
- Associate of Science in Network Systems Administration: \$15,863
- Associate of Software Development: \$22,158
- Bachelor of Science in Electrical Engineering and Communications Technology: \$53,038
- Bachelor of Science in Project Management and Administration: \$49,698

Record Preservation: ITT maintains a student's record for seven years following the student's last date of attendance. ITT will permanently retain the student's final transcript with respect to the student's enrollment in a program of study at the school and any transcripts with respect to the student's enrollment at any other postsecondary institution that the student may have provided to ITT.

ITT Technical Institute has contracted with Parchment to serve as the third-party custodian of electronic copies of all permanent academic records for ITT students. Additional information for students about the Parchment record request process is pending. Meanwhile, ITT Technical Institute also provides a transcript request page on its website <http://alumni.itt-tech.edu/update/>.

Instructional Methodology: ITT Technical Institute is divided into six schools of study in several career fields leading to associate, baccalaureate degrees, as well as an online Master of Business Administration. All programs blend traditional academic instruction with practical applications of theory in a laboratory environment and are designed to foster critical thinking, communication, and teamwork skills, while reinforcing both the theoretical and applied principles of technology. Each curriculum integrates technology, lifelong learning, and professional development activities. Curricular integration helps students connect the entire learning process to their lifetime career goals. These skills are essential for success in a dynamic information society. The programs consist of introductory quarters of basic knowledge and skills, the later quarters of the programs allow students to pursue more specialized areas of study.

Distance education courses are delivered pursuant to a consortium agreement with the Online Division. The agreement enables a resident campus student registered for a distance education course to receive appropriate faculty services support and to apply each successfully completed distance education course toward his or her graduation requirements.

The courses are delivered via the Internet through an asynchronous learning environment. There is a prescribed schedule for completion for each course. Support materials for each distance education course are sent to the student. These materials may include course syllabus, textbook, CD-ROM and other printed documents required for the distance education course. Students are assigned a cohort group for each distance education course. Online interaction within their assigned group and with the instructor is through the Learning Management System (LMS).

Prior to starting any of the distance education courses taught online, the student is required to complete the Online Student Preparation (OSP) offering, which describes the protocols that the student must follow when taking a distance education course.

Student Learning Resources: ITT offers learning resources to both its Clive campus students as well as those enrolled online.

ITT's students have access to the ITT Technical Institute Virtual Library. Students may access the Virtual Library at <http://library.itt-tech.edu>. Students or staff may direct any questions on the Virtual Library to the Corporate Librarian, 317-875-8748.

ITT maintains a Learning Resource Center (LRC) that includes access to the ITT Technical Institute Virtual Library at each of its campus locations. The LRC contains reference and reading materials related to the school's academic programs. Hours of operation and available services are posted in the campus LRC.

ITT provides its students with Career Services, which are designed to help students pursue their career goals. Through a series of workshops, seminars, panels and other events Career

Services provides information on career development components, such as resume writing, interviewing, professional dress, networking, occupational and industry knowledge, evaluation of job offers and salary negotiations. Additionally, Career Services and faculty provide instruction on career search development through the Professional Procedures and Portfolio Development course material.

Curriculum Evaluation and Development:

National Curriculum Committees: The National Curriculum Committee (NCC) for each academic department, including general education, is comprised of a group of subject matter expert faculty, Chairs and/ or Deans, nominated by District Managers and campus Directors and selected by the School of Study Managing Director of Instructional Operations (MDIO). The NCC is composed of a minimum of one representative per district where each program is offered. The overall responsibility of the NCC is to support the institution's mission by allowing faculty and community stakeholders' involvement with curriculum development and enhancements by providing a global feedback structure that will be used to help ensure a quality education for ITT Technical Institute students.

The NCC is charged with providing feedback on existing curricula, analyzing Program Advisory Committee feedback from local employers, identifying trends in the field, review implementation guides, assist with curriculum work tickets, assist with textbook selection, review tools and equipment and feedback on changes in the existing programs as well as new program proposals. Breckinridge School of Nursing and Health Sciences has a combined Leadership Committee/National Curriculum Committee that meets monthly and also provides input on all aspects of the Nursing, Medical Assisting and Administration and Health Information Technology programs.

The MDIO is the Managing Director, Instructional Operations. There is a MDIO for each of the six academic departments within the Institute. The MDIO is responsible for the oversight of curriculum for all the programs offered by that department. The MDIO serves as the chairperson for the National Curriculum Committee, oversees the ongoing activities and functions of the committee, and has overall responsibility for the implementation of the National Curriculum Committee.

Curriculum Development: Faculty participate as course developers from a national pool of ITT Tech faculty, i.e. writing and reviewing course content including quizzes and exams. Campus staff utilizes the curriculum work ticket process to provide feedback on course content, reporting discrepancies in the assessments, requesting a change in the course related documents. Curriculum is developed by ITT Tech faculty and external contracted (i.e., non-ITT Tech faculty) subject matter experts supported by internal and external subject matter experts, instructional designers, and project managers. Faculty feedback is also encouraged through the curriculum work ticket system and the National Curriculum Committees. The content included in a particular course or program is guided by the skills required in a particular industry, industry guidelines, market research and needs, comparative studies of similar academic programs, regulatory and/or accrediting entities, professional standards, CIP (Classification of Instructional Programs) codes, program student learning outcomes, and course specific learning objectives. Each student homework activity is mapped to student learning objectives during the initial design phase of course development. The course learning

objectives are mapped to program specific student learning outcomes which are in turn mapped to program skills.

Input is received from Program Advisory Committee surveys, National Curriculum committees, employer surveys, student surveys, publisher and vendor relationships regarding new trends, career services feedback, curriculum work tickets, and annual required updates. This input is evaluated by national subject matter experts to determine what content changes need to be made in a program and/or course. National subject matter experts also research the market and the needs of the market, review industry-required skills and guidelines. The curriculum work ticket process is used to provide feedback on course content, reporting discrepancies in the assessments, requesting a change in the course related documents, textbooks or other materials as well as course objectives and student learning outcomes. Feedback can also be submitted to respective district curriculum committee members as well and campus deans or school or department chairs.

Program Advisory Committees offer advice on the development of ITT Technical Institute's course curricula to help ensure that they reflect the current needs and expectations of employers. The Committees also review and advise on the adequacy of laboratory resources, faculty recruitment and retention, and faculty professional development. These Committees' insights play a vital role in providing students with the most up-to-date instructional materials. ITT Technical Institute regularly solicits feedback from Program Advisory Committee members on course content and educational resources. The Managing Director of Instructional Operations, who is responsible for curriculum content for each school of study, develops surveys that Program Advisory Committee members then submit via an online platform. The results are shared with the National Curriculum Committees and discussed at the next meeting.

Systematic Curriculum Evaluation: There are several avenues for faculty to participate in the evaluation of the curriculum. The curriculum work ticket process is used to provide feedback on course content, suggesting improvements in the assessments, requesting a change in the course related documents, textbooks or other materials as well as course objectives and student learning outcomes. Other avenues include participation in the Campus Effectiveness Plan, National Curriculum Committee district representation, faculty participation in the Program Advisory Committees, faculty meetings and faculty recommendations for LRC resources. ITT continuously monitors and adjusts program curricula, textbooks, and other educational resources to meet industry needs. Student, employer, and graduate surveys are administered, and the results are reviewed locally as well as by ITT/ESI to ensure feedback is appropriately applied to ongoing program improvement. Surveys include: Quarterly Student Evaluation, Student Course Evaluation, Employer, Advisory Committee and Graduate.

Student Complaints Process: ITT maintains a procedure for student complaints. Students are encouraged to communicate their concerns fully and frankly to members of the school faculty and administration. Reasonable measures will be undertaken to preserve the confidentiality of information that is reported during the investigation and to protect persons who report information from retaliation. All student complaints will be handled in the following manner:

- **Contact Campus Director:** A student must present to the Campus Director any complaint relating to the following: any aspect of the programs, facilities or other services provided by the school; action or alleged misrepresentation by an employee or representative of the

school; discrimination or harassment based on race, religion, color, age, sex, sexual orientation, national origin, disability, gender or any other protected status by any student, applicant, faculty member or other school employee, visitor or invitee of the school; and school activity. The complaint may be oral or written. The Campus Director will promptly acknowledge receipt of the complaint. The Director will meet with the student to discuss and respond to the complaint. Within three days of the discussion, the Director will prepare a written summary of the discussion. The Director will take the necessary steps to ensure that any agreed upon solution or other appropriate action is taken. For students who are enrolled in the online program, the Director of Academic Administration takes the place of the Campus Director in this procedure.

- Appeal to ITT Educational Services, Inc.: If a complaint is not resolved to the student's satisfaction, the student will, as soon as possible after the discussion with the Campus Director, submit the complaint on a Student Complaint Summary form to the Student Relations Specialist at ITT/ESI, 13000 N. Meridian Street, Carmel, IN 46032-1404; or the student may contact this office by telephone at (800) 388-3368. Within ten days after receipt of the student's written letter of complaint, the Student Relations Specialist, or designee will reply to the student in writing, specifying what action, if any, the Institute will undertake.
- Contact the State: Any questions or problems concerning ITT which have not been satisfactorily answered or resolved by the school should be directed to: Iowa College Student Aid Commission. The student may also file a complaint with the Iowa Attorney General's Office.
- Contact the accrediting agency: If the complaint has not been resolved to the satisfaction of the student, the complaint may also be referred to the institution's accrediting agency, the Accrediting Council for Independent Colleges and Schools.

Programs Offered In Iowa

The total, estimated cost of tuition, fees, books and supplies for each program is listed below.

On-Ground Programs Offered at ITT's Clive, Iowa campus

As of September 6, 2016, ITT has ceased instruction in its campus-based programs. The program list and total estimated program cost information below is offered for historical purposes.

- *Associate Degree Programs*
 - ✓ Associate of Science in Network Systems Administration: \$46,149
 - ✓ Associate of Science in Software Development: \$46,149
 - ✓ Associate of Science in Electrical Engineering Technology: \$46,649
 - ✓ Associate of Science in Drafting and Design Technology: \$46,649
 - ✓ Associate of Science in Industrial Engineering Technology: \$46,149
 - ✓ Associate of Science in Accounting: \$46,149
 - ✓ Associate of Science in Criminology and Forensic Technology: \$46,299
- *Baccalaureate Degree Programs*
 - ✓ Bachelor of Science in Information Systems and Cybersecurity: \$89,540

- ✓ Bachelor of Science in Software Development: \$89,040
- ✓ Bachelor of Science in Electrical Engineering and Communications Technology: \$89,540
- ✓ Bachelor of Science in Project Management and Administration, Construction, or Information Technology: \$89,540

Online Programs

Note that the Institute is no longer accepting new enrollment in its online programs and will cease instruction in those programs on the ending date of the current online program term, October 16, 2016. The program list and total estimated program cost information below is offered for historical purposes.

- *Associate Degree Programs*

- ✓ Associate of Applied Science in Network Systems Administration: \$39,818
- ✓ Associate of Applied Science in Software Development: \$39,818
- ✓ Associate of Applied Science in Information Technology, Computer Network Systems: \$47,628
- ✓ Associate of Applied Science in Information Systems Administration: \$41,096
- ✓ Associate of Applied Science in Computer Forensics: \$41,296
- ✓ Associate of Applied Science in Electrical Engineering Technology: \$40,493
- ✓ Associate of Applied Science in Drafting and Design Technology: \$40,318
- ✓ Associate of Applied Science in Industrial Engineering Technology: \$39,818
- ✓ Associate of Applied Science in Construction Technology: \$41,096
- ✓ Associate of Applied Science in Web Design Technology: \$41,696
- ✓ Associate of Applied Science in Web Design: \$40,418
- ✓ Associate of Applied Science in Accounting: \$39,818
- ✓ Associate of Applied Science in Business Management: \$39,818
- ✓ Associate of Applied Science in Business Administration: \$41,096
- ✓ Associate of Applied Science in Business Accounting Technology: \$41,096
- ✓ Associate of Applied Science in Criminology and Forensic Technology: \$40,143
- ✓ Associate of Applied Science in Criminal Justice: \$41,421
- ✓ Associate of Applied Science in Paralegal: \$39,818
- ✓ Associate of Applied Science in Paralegal Studies: \$41,096

- *Baccalaureate Degree Programs*

- ✓ Bachelor of Science in Information Systems and Cybersecurity: \$77,380
- ✓ Bachelor of Science in Software Development: \$76,880
- ✓ Bachelor of Science in Information Systems Security: \$77,380
- ✓ Bachelor of Science in Project Management: \$77,380
- ✓ Bachelor of Science in Construction Management: \$77,380
- ✓ Bachelor of Science in Accounting: \$76,880
- ✓ Bachelor of Science in Business Management: \$76,880
- ✓ Bachelor of Science in Business Administration, Finance: \$76,880
- ✓ Bachelor of Science in Business Administration, Human Resources Management: \$76,880
- ✓ Bachelor of Science in Business Administration, Marketing: \$76,880

- ✓ Bachelor of Science in Business Administration, Marketing Management: \$76,880
- ✓ Bachelor of Science in Business Administration, Project Management: \$76,880
- ✓ Bachelor of Science in Business Accounting Technology, Financial Accounting: \$76,880
- ✓ Bachelor of Science in Business Accounting Technology, Internal Controls: \$76,880
- ✓ Bachelor of Science in Project Management and Administration: \$77,380
- ✓ Bachelor of Science in Project Management and Administration, Construction: \$77,380
- ✓ Bachelor of Science in Project Management and Administration, Information Technology: \$77,380
- ✓ Bachelor of Science in Criminal Justice: \$77,205
- ✓ Bachelor of Science in Criminal Justice, Cyber Security: \$77,205

- *Master Degree Programs*

- ✓ Master of Business Administration: \$26,184

Field Experience: Some of the courses offered at ITT contain field work to be completed by the student at a location in Iowa. The programs which contain field experience and the description of the field work to be completed are:

- Associate of Science, Criminology and Forensic Technology (Clive campus): This program has an elective externship opportunity. Externship opportunities are limited and may not be available every quarter or for every student. Students who are interested must apply and be selected for the opportunities that may be available at that time. The student must complete 135 hours in the field to satisfy the requirement.

The distance education programs that ITT offers through its Indianapolis location do not contain any course requirements which consist of field work.

Registration Compliance

As required by Iowa Code Section 261B.4, ITT Technical Institute disclosed its institutional policy on refunding tuition charges for withdrawn students at the Clive campus and for Iowa resident students enrolled in online programs coordinated by the Institute's Indianapolis campus. ITT's tuition refund policy meets the requirements of Iowa Code Section 714.23 and is disclosed to students in the respective course catalog for the Clive and Indianapolis locations at:

- <https://www.itt-tech.edu/campus/download/117.pdf>
- <https://www.itt-tech.edu/campus/download/011.pdf>.

Administrative rules specifically require the school to comply with the requirements of Chapter 261.9(1) "e" through "h".

- Iowa Code Section 261.9(1)(e) requires a school to maintain and disseminate a drug and alcohol abuse policy that includes sanctions for violation of the school's policy and information about the availability of drug or alcohol counseling or rehabilitation. Iowa Code Section 261.9(1)(f) requires a school to maintain and disseminate a sexual abuse policy that includes information about counseling opportunities and reporting instances of sexual abuse to school officials and law enforcement. These requirements duplicate policies and

disclosures required by the federal Department of Education for a school that participates in the federal student aid programs. ITT complies with the requirements of Iowa Code Section 261.9(1)(e) and (f), for both the Clive and Indianapolis locations. The Institute discloses these policies and information in its Student Handbook within its Catalog, on pages 11-16, 29-32, and 39 for both handbooks. The links to the Catalogs are:

- ✓ <https://www.itt-tech.edu/campus/download/117.pdf>
- ✓ <https://www.itt-tech.edu/campus/download/011.pdf>.

- Iowa Code Section 261.9(1)(g) requires a school to maintain a special policy for refunding institutional charges and mandatory fees for members of the Iowa National Guard or reserve members of the U.S. Armed Forces, or the spouse of such a member if the member has a dependent child, when the service member or spouse must withdraw from the school because the service member has been called to active (Iowa) state or federal military duty or service. ITT maintains this policy for students attending its Clive campus as well as Indianapolis online programs. The policy is disclosed to students in the respective course catalogs for both the Clive and Indianapolis locations at:

- ✓ <https://www.itt-tech.edu/campus/download/117.pdf> - Page 55
- ✓ <https://www.itt-tech.edu/campus/download/011.pdf> - Page 169.

- Iowa Code Section 261.9(1)(h) requires an Iowa school to develop and implement a policy for employees who, in the course of their employment, attend, examine, counsel, or treat a child and who suspect the physical or sexual abuse of that child. By cross-reference from existing administrative rules for registration [283-21.2(261B), subsection 7], this new policy now applies to Iowa's registered schools. During the registration application evaluation process, ITT Technical Institute developed a policy that is compliant with this requirement and will disclose the policy to Iowa-based faculty in its online faculty portal.

Student Consumer Information: In its registration application, the Institute affirms its willingness to comply with the requirements of Iowa Code Chapter 261.9, as stipulated by Iowa Code Section 261B.4(8). Chapter 261.9 requires disclosure to students of information about the school's programs, charges, tuition refund policies, whether a certificate or diploma awarded by the school is applicable toward a degree program the school offers, and the identity of the school's accrediting agency. These disclosures are duplicative of the federal Department of Education's student consumer information disclosure requirements for a school that participates in the federal student aid programs and ITT discloses them in its respective course catalogs for the Clive and Indianapolis locations:

- ✓ <https://www.itt-tech.edu/campus/download/117.pdf>
- ✓ <https://www.itt-tech.edu/campus/download/011.pdf>.

ITT Technical Institute affirms on the application that it will comply with the provisions of Iowa Code Section 261B.7. These provisions state that provided a school does not claim "approval" or "accreditation" by the Commission or the State of Iowa, the school must disclose to students that it is registered by the Commission and provide Commission contact information for students who have questions or complaints about the school. ITT currently discloses the Commission's contact information for student complaints in its respective course catalogs for the Clive and Indianapolis locations.

Financial Responsibility: ITT Technical Institute submitted copies of an audit of its parent company, ITT Educational Services, Inc., conducted by independent auditing firm Deloitte & Touche, LLP, for the fiscal years ending December 31, 2015 and 2014, and dated March 14, 2016. The auditing firm expressed its opinion that ITT's consolidated statements of operations, comprehensive income, cash flows and shareholders' equity present fairly, in all material respects, the results of operations and cash flows of ITT Educational Services, Inc. in conformity with accounting principles.

- A for-profit institution that participates in the federal student aid programs must maintain a composite score, based on a three factor financial responsibility ratio, of at least 1.5 in order to be determined "financially responsible" without additional oversight. The most recently reported composite score validated by the federal Department of Education is for the institution's fiscal year ending December 31, 2014, when the Institute's composite score was 2.2 (out of a possible 3.0).
- A for-profit institution is prohibited from deriving more than 90% of its revenue from Title IV aid. The most recent 90/10 ratio verified by the federal Department of Education for ITT Technical Institute as a whole is for the institutional fiscal year ending 2013, when it derived 82.67% of its revenue from Title IV funds.

Full-Time Iowa Resident Faculty Member or Program Coordinator: ITT Technical Institute reported that it employed 1 full-time Iowa resident, Dr. Keri Nelson, as the Clive Campus Director. In addition, the Institute employed 13 part-time Iowa resident faculty and three part-time Iowa residents to perform other operational activities for the school besides teaching.

Instructional/Supervisory Staff Qualifications: ITT provided credentials for 13 faculty members who provided instruction at ITT's Clive location. Four of the 13 faculty members hold baccalaureate level degrees; these instructors have extensive professional experience in their areas of expertise. One of these instructors has 12 years' experience working for the City of Des Moines Police Department as a technician. Another has 11 years' experience as an engineer and architect. Eight of the 13 instructors hold masters level degrees in fields such as business administration, engineering, and liberal studies. One of the 13 faculty members holds a doctoral degree, two master's degrees in the field of technology, and has six years of experience teaching at ITT.

ITT provided credentials for 74 faculty members which provide instruction for ITT's online programs through the Indianapolis location. Sixty of the 74 faculty members hold master level degrees in fields such as accountancy, advanced studies, architecture, business administration, communication, education, engineering management, management information systems, professional writing, social service, and theological studies. Some of these instructors have considerable professional experience – one instructor has 36 years' experience in their specialty; one has 34 years' of experience; another has 33 years' of experience in their field. Fourteen of the 74 faculty members hold doctoral degrees in various fields, which include business administration, computer science, law, and management. Some of these faculty members have lengthy professional experience. One faculty member has 26 years' experience in their field of study, while another has 32 years' experience in their specialty and a total of 27 years of teaching experience.

Commitment to Iowa Students and Teach-Out: By executing his signature on the application, ITT Technical Institute President Kevin M. Modany committed to the delivery of programs in Iowa, and agreed to provide alternatives for students to complete those programs at other institutions if ITT ceases the delivery of the program before students have completed their courses of study, or if the school closes before students have completed their course of study.

Student Complaints: None.

Compliance with Iowa Code Chapter 714

Section 714.18 – Evidence of Financial Responsibility

ITT Technical Institute has maintained the financial responsibility requirements of Iowa Code Section 714.18, including a continuous corporate surety bond payable to the State of Iowa in the amount of \$50,000, issued by Westchester Fire Insurance Company on April 5, 2016.

Section 714.23 – State Tuition Refund Policy

ITT Technical Institute's tuition refund policy for students who withdraw from its Clive campus or Iowa residents who withdraw from its online programs complies with the provisions of Iowa Code Section 714.23.

Compliance with Iowa Code Chapter 261F

ITT Technical Institute maintains an Educational Code of Conduct that is compliant with Iowa Code Chapter 261F and publishes the Code of Conduct in its Catalogs at:

- <https://www.itt-tech.edu/campus/download/117.pdf> - (Clive Catalog Page 64 – 65)
- <https://www.itt-tech.edu/campus/download/011.pdf> - (Indianapolis/Online Catalog Page 188 – 190).

Staff found no evidence that the Institute refers student or parent borrowers to specific private education loan lenders. The Institute informs staff that its financial aid representatives tell students that there are no private loan programs available through the Institute, and that in response to questions about private loan options from students, the Institute advises students to contact banking institutions of their own choice to research private education loan options.

IOWA COLLEGE STUDENT AID COMMISSION

**Audit and Finance Committee
September 2016**

An Audit and Finance Committee report will be provided during the September 16, 2016 Commission Meeting.

IOWA COLLEGE STUDENT AID COMMISSION

**Legislative Committee
September 2016**

A Legislative Committee report will be provided during the September 16, 2016 Commission Meeting.

**IOWA COLLEGE STUDENT AID COMMISSION
OPERATING FUND 0163 - YEAR TO DATE UNIT DETAIL
SUMMARY OF RESOURCES AND EXPENDITURES
SFY 2016 as of June 30, 2016**

Operating Fund	UNIT	UNIT	UNIT	UNIT	UNIT	UNIT	UNIT	UNIT	UNIT	UNIT	UNIT	YTD	YTD	YTD Actual
	2001	2002	3004	4001	5002	5003	7007	8008	9001	9008	ACTUAL	BUDGET	to Budget	
	ADMIN	MARKETING	FFELP	JR JUSTICE	S&G	POSTSEC REG	CCE/ CHALLENGE E GRANT	PLP	GEAR UP SCH	GEAR UP	TOTAL	TOTAL	Variance	
Revenues/Resources:														
1 Interest on Operating Fund	133,341	-	-	-	-	-	-	-	-	-	133,341	50,000	83,341	
2 Other Revenue/ PLP & Great Lakes Revenue (P&I)	75	-	4,788,202	-	-	-	586	160,400	7,374	-	4,956,637	2,235,065	2,721,572	
3 Intra-Agency Reimbursements	2,290	-	-	-	26,104	-	-	-	2,486,588	-	2,514,982	1	2,514,981	
4 Intra State Transfer	-	-	-	-	60,111	92,082	-	-	-	-	152,193	70,000	82,193	
5 Grant DrawDown from USDE	-	-	-	30,796	22,154	-	365,658	-	2,486,588	1,599,228	4,504,424	11,293,795	(6,789,371)	
6 Reimbursements from other Entities	276	-	-	-	-	-	-	-	-	-	276	1	275	
7 Gov Transfer In Other Agencies	-	-	-	-	-	-	-	-	-	-	-	-	-	
8 Fees, Licenses & Permits	-	-	-	-	-	-	-	-	-	-	-	-	-	
9 Unearned Receipts	-	-	-	-	-	-	50,000	-	-	-	50,000	-	50,000	
10 State Appropriation	-	-	-	-	-	-	-	-	-	-	-	-	-	
Total Revenues/Resources	\$ 135,982	\$ -	\$ 4,788,202	\$ 30,796	\$ 108,369	\$ 92,082	\$ 416,244	\$ 160,400	\$ 4,980,550	\$ 1,599,228	\$ 12,311,853	\$ 13,648,862	\$ (1,337,009)	
Expenditures:														
11 Personal Services	1,420,841	356,153	-	-	108,383	203,203	190,072	-	-	486,834	2,765,486	3,066,989	(301,503)	
12 Travel	12,116	(22,322)	-	-	2,402	2,393	27,519	-	-	110,135	132,243	141,114	(8,871)	
13 Office Supplies	20,798	3,014	-	-	939	536	575	-	-	1,897	27,759	51,563	(23,804)	
14 Equipment Repairs	-	-	-	-	-	-	-	-	-	-	-	1,300	(1,300)	
15 Professional & Scientific Supplies	-	-	-	-	-	-	-	-	-	-	-	1	(1)	
16 Other Supplies	-	-	-	-	-	-	-	-	-	4,913	4,913	-	4,913	
17 Printing and Binding	297	40,227	-	-	50	-	12,577	-	-	8,839	61,990	129,301	(67,311)	
18 Food	131	-	-	-	-	-	-	-	-	-	131	400	(269)	
19 Postage	2,861	15,976	-	-	1,525	-	128	-	-	5,198	25,688	31,501	(5,813)	
20 Communications	20,913	2,167	-	-	2,746	751	5,251	-	-	4,592	36,420	40,185	(3,765)	
21 Rentals	176,158	385	-	-	-	-	-	-	-	400	176,943	162,608	14,335	
22 Professional & Scientific Services	11,500	-	-	-	4,753	-	40,000	-	-	73,967	130,220	36,500	93,720	
23 Outside Services - Other	30,419	1,575	-	-	4,899	3,520	72,172	44,912	882	889,232	1,047,611	1,338,292	(290,681)	
24 Intra-State Transfers	9,180	-	-	-	-	-	1,020	-	-	-	10,200	88,039	(77,839)	
25 Advertising & Publicity	-	23,226	-	-	-	-	-	-	-	162	23,388	121,400	(98,012)	
26 Attorney General	30,334	-	-	-	-	-	-	-	-	-	30,334	35,000	(4,666)	
27 State Audits	13,851	-	-	-	-	-	-	-	-	-	13,851	34,125	(20,274)	
28 State Reimbursements	30,472	99	-	-	2,153	254	465	-	-	1,374	34,817	51,859	(17,042)	
29 ITE Reimbursements	112,698	3,509	-	-	816	8,428	428	-	-	1,204	127,083	184,969	(57,886)	
30 IT Outside Services	3,259	-	-	-	411,622	-	-	-	-	-	414,881	800,407	(385,526)	
31 Intra-Agency Reimbursements	(2,037,541)	(430,024)	-	18,579	782,218	239,354	550,267	7,403	125,846	750,140	6,241	1	6,240	
32 Equipment	-	5,183	-	-	104	-	-	-	-	-	5,287	28,000	(22,713)	
33 Office Equipment	-	-	-	-	-	-	-	-	-	-	-	12,000	(12,000)	
34 IT Equipment & Software	140,688	-	-	-	790	-	505	-	-	2,450	144,433	270,031	(125,598)	
35 Other Expenses & Obligations	-	832	-	-	1,063	-	-	-	-	-	1,895	2,856	(961)	
36 Licenses	-	-	-	-	-	-	-	-	-	28,000	28,000	-	28,000	
37 Fees	-	-	-	-	-	-	-	-	-	-	-	1	(1)	
38 Other Refunds	-	-	37	-	-	-	-	-	-	-	37	1,500	(1,463)	
39 Outside Repairs/Services	1,025	-	-	-	-	-	-	-	-	-	1,025	1	1,024	
40 State Aid	-	-	-	-	-	-	-	-	-	-	-	9,009,286	(9,009,286)	
41 Aid to Individuals	-	-	-	28,794	-	-	24,663	-	4,963,366	-	5,016,823	-	5,016,823	
Total Expenditures	\$ -	\$ -	\$ 37	\$ 47,373	\$ 1,324,463	\$ 458,439	\$ 925,642	\$ 52,315	\$ 5,090,094	\$ 2,369,337	\$ 10,267,699	\$ 15,639,229	\$ (5,371,530)	
Net Gain(Loss)Operating Fund	\$ 135,982	\$ -	\$ 4,788,165	\$ (16,577)	\$ (1,216,094)	\$ (366,357)	\$ (509,398)	\$ 108,085	\$ (109,544)	\$ (770,109)	\$ 2,044,154	\$ (1,990,367)	\$ 4,034,521	

IOWA COLLEGE STUDENT AID COMMISSION
OPERATING FUND 0163 - YEAR TO DATE/PRIOR YEAR ACTUAL COMPARISON BY UNIT
SUMMARY OF RESOURCES AND EXPENDITURES
SFY 2016 as of June 30, 2016

Operating Fund	Class	FY 2016 Operating Budget	FY 2016 Year to Date Budget	FY 2015 Jun-15 Mth Actual	FY 2016 Jun-16 Mth Actual	FY 2015 Year to Date Actuals	FY 2016 Year to Date Actuals	YTD Actual to Budget Variance
Revenues/Resources:								
1	Interest on Operating Fund (2001)	50,000	50,000	5,011	13,570	90,701	133,341	83,341
2	Other Revenue/ PLP & Great Lakes Revenue (P&I)	2,235,065	2,235,065	-	571,444	3,178,603	4,956,637	2,721,572
3	Intra-Agency Reimbursements	1	1	7,847	4,743	3,026,774	2,488,878	2,488,877
4	Reimbursement Other Agencies	1	1	-	53	-	276	275
5	Intra State Transfer	70,000	70,000	9,168	106,140	88,590	178,297	108,297
Total Revenues/Resources		\$ 2,355,067	\$ 2,355,067	\$ 22,026	\$ 695,950	\$ 6,384,668	\$ 7,757,429	\$ 5,402,362
Expenditures:								
6	Agency Administration (2001)	1,562,484	1,562,484	24,550	-	1,985,259	-	(1,562,484)
7	Marketing Administration (2002)	511,238	511,238	(5,032)	-	374,474	-	(511,238)
Total Administrative		\$ 2,073,722	\$ 2,073,722	\$ 19,518	\$ -	\$ 2,359,734	\$ -	\$ (2,073,722)
8	FFELP Expense (3004)	501	501	-	-	-	37	(464)
9	Collection Expense - PLP (8008)	66,606	66,606	0	0	68,227	52,315	(14,291)
Total FFELP and Collection Expenses		\$ 67,107	\$ 67,107	\$ -	\$ -	\$ 68,227	\$ 52,352	\$ (14,755)
10	Scholarship and Grants (5002)	1,721,373	1,721,373	(60)	116	335,219	1,324,463	(396,910)
11	Postsecondary Registration (5003)	483,232	483,232	0	-317	153,996	458,439	(24,793)
Total Osteo, S&G, Postsecondary Reg		\$ 2,204,605	\$ 2,204,605	\$ (60)	\$ (201)	\$ 489,215	\$ 1,782,902	\$ (421,703)
Total Operating Expenses		4,345,434	4,345,434	19,458	(201)	2,917,175	1,835,254	(2,510,180)
Net resources (exp) before other		\$ (1,990,367)	\$ (1,990,367)	\$ 2,568	\$ 696,151	\$ 3,467,493	\$ 5,922,175	\$ 7,912,542
Federal Grant Resources (Grant Drawdown)								
12	Gear Up Grant (9008)	3,219,603	3,219,603	142,441	39,152	454,774	1,599,228	(1,620,375)
13	Gear Up Scholarship (9001) (5002)	7,500,000	7,500,000	7,847	5,040	3,021,008	2,508,742	(4,991,258)
14	JR Justice (4001)	50,000	50,000	-	605	60,762	30,796	(19,204)
17	Challenge Grant (7007)	524,192	524,192	31,668	12,962	647,038	415,658	(108,534)
Total Federal Grant Resources		\$ 11,293,795	\$ 11,293,795	\$ 181,956	\$ 57,759	\$ 4,183,582	\$ 4,554,424	\$ (6,739,371)
Federal Grant Expenditures (grants)								
18	Gear Up Grant (9008)	3,219,603	3,219,603	282,365	77,942	757,397	2,369,337	(850,266)
19	Gear Up Scholarship (9001)	7,500,000	7,500,000	24,892	110,671	6,072,662	5,090,094	(2,409,906)
20	JR Justice (4001)	50,000	50,000	-	-297	56,639	47,373	(2,627)
21	Challenge Grant/VISTA (7007)	524,192	524,192	4,325	28,746	644,147	925,642	401,450
Total Federal Grant Expenditures		\$ 11,293,795	\$ 11,293,795	\$ 311,582	\$ 217,062	\$ 7,530,845	\$ 8,432,445	\$ (2,861,350)
Net Federal Grant Income (loss)		\$ -	\$ -	\$ (129,626)	\$ (159,303)	\$ (3,347,262)	\$ (3,878,021)	\$ (3,878,021)
Net Gain (Loss) Operating Fund		\$ (1,990,367)	\$ (1,990,367)	\$ (127,058)	\$ 536,848	\$ 120,230	\$ 2,044,154	\$ 4,034,521

IOWA COLLEGE STUDENT AID COMMISSION
SCHOLARSHIP & GRANT ADMINISTRATION
SUMMARY OF EXPENDITURES
SFY 2016 as of June 30, 2016

State Appropriated - \$431,896

	FY 2015	FY 2016	FY 2016	FY 2016	Variance
	Actual	Budget	Year to Date	Year to Date	Over
			Budget	Actual	(Under)
Expenditures:					
1 Salaries	\$ 232,420	\$ 458,282	458,282	\$ 371,785	\$ (86,497)
2 Travel	-	-	-	-	-
3 Office Supplies	-	-	-	-	-
4 Equipment Repairs	-	-	-	-	-
5 Printing	-	-	-	-	-
6 Postage	-	-	-	-	-
7 Communications	-	-	-	-	-
8 Rental	-	-	-	-	-
9 Professional Services	-	-	-	-	-
10 Outside Services	-	-	-	-	-
11 State Transfers	-	-	-	60,111	60,111
12 State Reimbursements	-	-	-	-	-
13 ITD Reimbursements	17,689	-	-	-	-
14 Office Equipment	-	-	-	-	-
15 IT Equipment & Software	-	-	-	-	-
16 Other Expenses & Obligations	-	-	-	-	-
Total Expenditures	\$ 250,109	\$ 458,282	\$ 458,282	\$ 431,896	\$ (26,386)

Non Appropriated (Covered by Operating Fund 0163-Unit 5002)

	FY 2015	FY 2016	FY 2016	FY 2016	Variance
	Actual	Budget	Year to Date	Year to Date	Over
			Budget	Actual	(Under)
Expenditures:					
17 Salaries	29,346	2,934	2,934	108,383	105,449
18 Travel	2,365	13,920	13,920	2,402	(11,518)
19 Office Supplies	311	2,570	2,570	939	(1,631)
20 Professional Services	3,802	-	-	4,753	4,753
21 Printing	-	1,000	1,000	50	(950)
22 Postage	1,724	4,000	4,000	1,525	(2,475)
23 Communications	3,172	2,774	2,774	2,746	(28)
24 Rental	-	-	-	-	-
25 Outside Services	5,713	6,000	6,000	4,899	(1,101)
26 State Transfers	-	26,386	26,386	-	(26,386)
27 State Reimbursements	1,652	1,820	1,820	2,153	333
28 ITD Reimbursements	1,646	1,425	1,425	816	(609)
29 Intra-Agency Reimbursements	750,546	856,544	856,544	782,218	(74,326)
30 Gov Transfer Other Agencies	-	-	-	104	104
31 Office Equipment	-	-	-	-	-
32 IT Equipment & Software	1,185	2,000	2,000	790	(1,210)
33 IT Outside Services	158,391	800,000	800,000	411,622	(388,378)
34 Other Expenses & Obligations	-	-	-	1,063	1,063
Total Expenditures	\$ 959,853	\$ 1,721,373	\$ 1,721,373	\$ 1,324,463	\$ (396,910)

Total Expenditures (Appropriated + Non-Appropriated)

	FY 2015	FY 2016	FY 2016	FY 2016	Variance
	Actual	Budget	Year to Date	Year to Date	Over
			Budget	Actual	(Under)
Expenditures:					
35 Salaries	\$ 261,766	\$ 461,216	\$ 461,216	\$ 480,168	\$ 18,952
36 Travel	2,365	13,920	13,920	2,402	(11,518)
37 Office Supplies	311	2,570	2,570	939	(1,631)
38 Equipment Repairs	3,802	-	-	4,753	4,753
39 Printing	-	1,000	1,000	50	(950)
40 Postage	1,724	4,000	4,000	1,525	(2,475)
41 Communications	3,172	2,774	2,774	2,746	(28)
42 Rental	-	-	-	-	-
43 Outside Services	5,713	6,000	6,000	4,899	(1,101)
44 State Transfers	-	26,386	26,386	60,111	33,725
45 State Reimbursements - Other	1,652	1,820	1,820	2,153	333
46 ITD Reimbursements	1,646	1,425	1,425	816	(609)
47 Intra-Agency Reimbursements	768,235	856,544	856,544	782,218	(74,326)
48 Gov Transfer Other Agencies	-	-	-	104	104
49 Office Equipment	-	-	-	-	-
50 IT Equipment & Software	1,185	2,000	2,000	790	(1,210)
51 IT Outside Services	158,391	800,000	800,000	411,622	(388,378)
52 Other Expenses & Obligations	-	-	-	1,063	1,063
Total Expenditures	\$ 1,209,962	\$ 2,179,655	\$ 2,179,655	\$ 1,756,359	\$ (423,296)

Check

Iowa College Student Aid Commission

Postsecondary Registration September 2016

Postsecondary Registration Approvals

Staff has approved the following noncontroversial registration applications since the last report to Commissioners in July of 2016.

- Saint Leo University (out of state)
- Drexel University (out of state)
- Post University (out of state)
- The Pennsylvania State University (out of state)
- University of Wisconsin – Stout (out of state)
- Southwest Minnesota State University (out of state)
- The Catholic University of America (out of state)
- Hamilton Technical College (Iowa)
- Antioch School of Church Planting (Iowa)
- Mount Mercy University (Iowa – SARA approved)
- Palmer College of Chiropractic (Iowa – SARA approved)

Postsecondary registration evaluation reports for approved schools may be accessed on the Commission's website at <https://www.iowacollegeaid.gov/content/postsecondary-applications>.

Exemption & SARA Approvals

Staff has approved the following schools' application for exemption from registration and participation in SARA under new consumer protection rules for exempt schools that became effective on May 27, 2016:

- Western Iowa Tech Community College
- Simpson College
- Upper Iowa University

Iowa schools that are approved for SARA participation are listed on the NC-SARA website at <http://nc-sara.org/states/ia>.

Exemption Approvals

- INSTE Bible College
- Maharishi University of Management

Exemption Applications under Review

- Allen College
- American Hair Academy
- Body Wisdom