

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 Federal Register 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.

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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

Withheld pursuant to exemption

(b)(5)

of the Freedom of Information and Privacy Act

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

Withheld pursuant to exemption

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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

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of the Freedom of Information and Privacy Act

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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 <Jack.Cox@ed.gov>
Sent: Friday, February 28, 2020 9:34 AM
To: Akins, Karen <Karen.Akins@ed.gov>; Sanders, P.J. <Phyllis.Jean.Sanders@ed.gov>
Cc: Bounds, Herman <Herman.Bounds@ed.gov>; Hilsey, Shaina <Shaina.Hilsey@ed.gov>
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 <Karen.Akins@ed.gov>
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 <Jack.Cox@ed.gov>; Hilsey, Shaina <Shaina.Hilsey@ed.gov>; Huston, John <John.Huston@ed.gov>; 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

Withheld pursuant to exemption

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of the Freedom of Information and Privacy Act

Withheld pursuant to exemption

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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



UNITED STATES DEPARTMENT OF EDUCATION
OFFICE OF POSTSECONDARY EDUCATION

June 23, 2020

VIA EMAIL

Michelle Edwards, President
Accrediting Council for Independent 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.¹

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.

400 Maryland Avenue, S.W., Washington, DC 20202
www.ed.gov

The Department of Education’s mission is to promote student achievement and preparation for global Competitiveness by fostering educational excellence and ensuring equal access.

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**

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

Digitally signed by Herman
Bounds
Date: 2020.06.23 10:50:26
-04'00'

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.

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of the Freedom of Information and Privacy Act

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of the Freedom of Information and Privacy Act

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 [FAQ](#) 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)

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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 philosophy 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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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 at (b)(6) or Greg Bernert at (b)(6) if you have any questions.

Thank you,

Lisa F. Robinson
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

(b)(5)

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

(b)(5)

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 right 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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HIGHER LEARNING COMMISSION

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Chicago, IL 60604-1411
312.263.0456 | 800.621.7440
Fax: 312.263.7462 | hlcommission.org

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

- cc: 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



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: lnoack@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) 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

(b)(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

(b)(6)

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.

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

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.



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 pre-acquisition 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 <(b)(6)>@gcu.edu>

Sun 11/26/2017 10:21 AM

To: Karen Solinski <(b)(6)>@hlcommission.org>; Robert Rucker <rucker@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, Karen....talk 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 <rucker@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

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

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.



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.

President Mueller, November 17, 2017 2

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

Sincerely,

(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 [INST.B.20.040, Change of Control Structure, or Organization](#), and the [Change of Control, Structure or Organization Procedure](#).

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 hlcommission.org/change.

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.¹ 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.)

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.

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.
2. 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-to-day management of the institution to the administration and expects the faculty to oversee academic matters.

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.)
4. 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:\(b\)\(6\)@hlcommission.org](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
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



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



For Internal FSA Use only - Unvalidated Data

Yellow = Closing

OPEID6	School Name	City	ST	Total Outstanding	Borrowers	Loans	Total Title IV (2016-2017)	Accreditor	# of Locations Including Main	# of Locations Closing	# of Locations 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	(b)(5)
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

Main OPEID	OPEID	Main Name
009270	00927002	Art Institute of Atlanta (The)
009270	00927003	Art Institute of Atlanta (The)
009270	00927004	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)
010195	01019501	Art Institute of Fort Lauderdale (The)
010195	01019502	Art Institute of Fort Lauderdale (The)
008350	00835000	Art Institute of Philadelphia (The)
008350	00835001	Art Institute of Philadelphia (The)
008350	00835002	Art Institute of Philadelphia (The)
040513	04051300	Art Institute of Phoenix (The)
040513	04051304	Art Institute of Phoenix (The)
040513	04051334	Art Institute of Phoenix (The)
040513	04051337	Art Institute of Phoenix (The)
040513	04051340	Art Institute of Phoenix (The)
007819	00781900	Art Institute of Portland (The)
007819	00781902	Art Institute of Portland (The)
007819	00781903	Art Institute of Portland (The)
012584	01258400	Illinois Institute of Art (The)
012584	01258401	Illinois Institute of Art (The)
012584	01258403	Illinois Institute of Art (The)
012584	01258405	Illinois Institute of Art (The)
013039	01303914	South University
013039	01303922	South University
013039	01303923	South University
021799	02179903	Argosy University
021799	02179908	Argosy University
021799	02179913	Argosy University
021799	02179914	Argosy University
021799	02179918	Argosy University
021799	02179919	Argosy University
021799	02179921	Argosy University
021799	02179929	Argosy University
021799	02179930	Argosy University
021799	02179932	Argosy University
021799	02179935	Argosy University
021799	02179938	Argosy University
021799	02179943	Argosy University
021799	02179944	Argosy University
021799	02179945	Argosy University

021799	02179947	Argosy University
021799	02179948	Argosy University
021799	02179949	Argosy University

Bold text = Main Location

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

Address 1	Address 2	City	State	Total Outstanding
The Ames Center	1820 North Fort Myer Drive	Arlington	VA	\$7,258,421
100 CNA Drive		Nashville	TN	\$5,717,278
24 North Market Street	The Carroll Building	Charleston	SC	\$3,775,970
1200 Lincoln Street		Denver	CO	\$7,856,880
675 South Broadway		Denver	CO	
1799 Southeast 17th Street		Fort Lauderdale	FL	\$8,083,900
1650 Southeast 17th Street		Fort Lauderdale	FL	
1600 Southeast 17th Street		Fort Lauderdale	FL	
1622 Chestnut Street		Philadelphia	PA	\$12,153,385
2300 Market Street		Philadelphia	PA	
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	
4839 Higbee Avenue NW		Canton	OH	
2665 Renfrew Street		Vancouver		
1122 NorthWest Davis Street		Portland	OR	\$7,664,052
722 NW Couch Street		Portland	OR	
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		Chicago	IL	
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	CO	\$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	
				<u>\$256,389,352</u>

Borrowers	Loans	Estimated Percent of Main	Estimated Funding (2016-2017)	Accreditor
310	1,913	17.0%	\$9,988,731	SACS
257	1,504	13.4%	\$7,867,876	SACS
211	1,055	8.8%	\$5,196,330	SACS
371	2,055	100.0%	\$8,737,824	HLC
		0.0%	\$0	HLC
349	2,177	100.0%	\$10,802,557	WASC (Formerly ACICS)
		0.0%	\$0	WASC (Formerly ACICS)
		0.0%	\$0	WASC (Formerly ACICS)
598	3,298	100.0%	\$15,127,626	Middle States
		0.0%	\$0	Middle States
		0.0%	\$0	Middle States
392	2,443	34.7%	\$17,769,673	WASC (Formerly ACICS)
366	2,056	28.7%	\$14,687,875	WASC (Formerly ACICS)
		0.0%	\$0	WASC (Formerly ACICS)
		0.0%	\$0	WASC (Formerly ACICS)
		0.0%	\$0	WASC (Formerly ACICS)
306	2,030	100.0%	\$8,145,769	NWCCU
		0.0%	\$0	NWCCU
		0.0%	\$0	NWCCU
515	2,944	47.9%	\$14,980,048	HLC
229	1,332	22.3%	\$6,990,023	HLC
		0.0%	\$0	HLC
318	1,603	26.2%	\$8,203,603	HLC
341	1,407	2.8%	\$7,882,341	SACS
329	1,321	2.5%	\$7,028,454	SACS
235	1,084	1.9%	\$5,425,016	SACS
369	1,353	5.7%	\$19,968,272	WASC
139	710	2.2%	\$7,797,237	WASC
11	82	0.2%	\$534,728	WASC
218	789	1.7%	\$5,941,969	WASC
258	884	2.3%	\$8,039,724	WASC
299	1,067	1.7%	\$6,002,223	WASC
155	694	2.7%	\$9,389,759	WASC
111	489	0.9%	\$3,220,819	WASC
150	427	1.0%	\$3,328,609	WASC
279	1,183	2.1%	\$7,204,219	WASC
115	364	0.8%	\$2,690,834	WASC
550	3,107	2.4%	\$8,336,599	WASC
222	1,196	1.0%	\$3,531,303	WASC
302	1,967	1.7%	\$5,850,162	WASC
261	1,511	1.2%	\$4,317,980	WASC

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

Green = Staying Open
Yellow = Closing

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

For Internal FSA Use only - Unvalidated Data

Main OPEID	OPEID	Main Name	Location Name	Address 1	Address 2	City	State	Total Outstanding	Borrowers	Loans	Estimated Percent of Main	Estimated Funding [2016-2017]
009270	00927000	Art Institute of Atlanta (The)	Art Institute of Atlanta (The)	6600 Peachtree Dunwoody Road	100 Embassy Row	Atlanta	GA	\$19,943,927	969	5,481	46.7%	\$27,445,987
009270	00927002	Art Institute of Atlanta (The)	Art Institute of Atlanta (The) - Art Institute of Washington (The)	The Ames Center	1820 North Fort Myer Drive	Arlington	VA	\$7,258,421	310	1,913	17.0%	\$9,988,731
009270	00927003	Art Institute of Atlanta (The)	Art Institute of Atlanta (The) - Art Institute of Tennessee-Nashville	100 CNA Drive		Nashville	TN	\$5,717,278	257	1,504	13.4%	\$7,867,876
009270	00927004	Art Institute of Atlanta (The)	Art Institute of Atlanta (The) - The Art Institute of Charleston	34 North Market Street	The Carroll Building	Charleston	SC	\$3,775,970	211	1,055	8.8%	\$5,196,310
009270	00927007	Art Institute of Atlanta (The)	Art Institute of Atlanta (The) - The Art Institute of Virginia Beach	4500 Main Street	Suite 100	Virginia Beach	VA	\$4,840,020	216	1,263	11.3%	\$6,660,630
020789	02078900	Art Institute of Colorado (The)	Art Institute of Colorado (The)	1200 Lincoln Street		Denver	CO	\$7,856,880	371	2,055	100.0%	\$8,737,824
020789	02078904	Art Institute of Colorado (The)	Art Institute of Colorado (The)	675 South Broadway		Denver	CO				0.0%	\$0
010195	01019500	Art Institute of Fort Lauderdale (The)	Art Institute of Fort Lauderdale (The)	1799 Southeast 17th Street		Fort Lauderdale	FL	\$8,083,900	349	2,177	100.0%	\$10,802,557
010195	01019501	Art Institute of Fort Lauderdale (The)	Art Institute of Fort Lauderdale (The) - Harbor Place Building	1650 Southeast 17th Street		Fort Lauderdale	FL				0.0%	\$0
010195	01019502	Art Institute of Fort Lauderdale (The)	Art Institute of Fort Lauderdale (The) - Harbor Place Building	1600 Southeast 17th Street		Fort Lauderdale	FL				0.0%	\$0
021171	02117100	Art Institute of Houston (The)	Art Institute of Houston (The)	4140 Southwest Freeway		Houston	TX	\$14,804,085	751	4,085	44.7%	\$17,918,874
021171	02117102	Art Institute of Houston (The)	Art Institute of Houston (The) - The Art Institute of Austin	101 W Louis Henna Blvd	Suite 100	Austin	TX	\$8,056,956	357	2,132	24.3%	\$9,752,145
021171	02117104	Art Institute of Houston (The)	Art Institute of Houston (The) - The Art Institute of San Antonio	10000 West Interstate Highway 10		San Antonio	TX	\$10,083,766	456	2,648	30.5%	\$12,205,397
008350	00835000	Art Institute of Philadelphia (The)	Art Institute of Philadelphia (The)	1822 Chestnut Street		Philadelphia	PA	\$12,153,385	598	3,298	100.0%	\$15,127,624
008350	00835001	Art Institute of Philadelphia (The)	Art Institute of Philadelphia (The)	2100 Market Street		Philadelphia	PA				0.0%	\$0
008350	00835002	Art Institute of Philadelphia (The)	Art Institute of Philadelphia (The)	1610 Chestnut Street		Philadelphia	PA				0.0%	\$0
040513	04051300	Art Institute of Phoenix (The)	Art Institute of Phoenix (The)	2233 West Dunlap Avenue		Phoenix	AZ	\$8,553,168	392	2,443	34.7%	\$11,769,673
040513	04051303	Art Institute of Phoenix (The)	Art Institute of Phoenix (The) - Art Institute of Las Vegas (The)	2350 Corporate Circle		Henderson	NV	\$8,623,775	425	2,401	35.0%	\$11,916,363
040513	04051304	Art Institute of Phoenix (The)	Art Institute of Phoenix (The) - Art Institute of Indianapolis (The)	3500 Depauw Boulevard		Indianapolis	IN	\$7,069,790	366	2,056	28.7%	\$14,687,875
040513	04051334	Art Institute of Phoenix (The)	Art Institute of Phoenix (The) - ATS Michigan City Humane	722 US Highway 212		Michigan City	IN				0.0%	\$0
040513	04051337	Art Institute of Phoenix (The)	Art Institute of Phoenix (The) - ATS N Canton Higbee	4839 Higbee Avenue NW		Canton	OH				0.0%	\$0
040513	04051340	Art Institute of Phoenix (The)	Art Institute of Phoenix (The) - The Art Institute of Vancouver	2665 Renfrew Street		Vancouver	BC				0.0%	\$0
007470	00747000	Art Institute of Pittsburgh (The)	Art Institute of Pittsburgh (The)	420 Boulevard of the Allies		Pittsburgh	PA	\$39,368,550	1,951	10,257	100.0%	\$59,384,466
007819	00781900	Art Institute of Portland (The)	Art Institute of Portland (The)	1122 NorthWest Davis Street		Portland	OR	\$7,664,052	306	2,030	100.0%	\$8,145,769
007819	00781902	Art Institute of Portland (The)	Art Institute of Portland (The) - Industrial Design Workshop	722 NW Couch Street		Portland	OR				0.0%	\$0
007819	00781903	Art Institute of Portland (The)	Art Institute of Portland (The) - Culinary Arts Facility	34 NW 8th Avenue		Portland	OR				0.0%	\$0
022913	02291300	Art Institute of Seattle (The)	Art Institute of Seattle (The)	2323 Elliott Avenue		Seattle	WA	\$8,167,998	388	2,074	100.0%	\$9,154,199
022913	02291302	Art Institute of Seattle (The)	Art Institute of Seattle (The)	2601 Elliott Avenue		Seattle	WA				0.0%	\$0
012584	01258400	Illinois Institute of Art (The)	Illinois Institute of Art (The)	350 North Orleans Street	Suite 136-L	Chicago	IL	\$10,480,106	515	2,944	47.9%	\$14,980,048
012584	01258401	Illinois Institute of Art (The)	Illinois Institute of Art (The) - The IL Institute of Art - Schaumburg	1000 Plaza Drive	Suite 100	Schaumburg	IL	\$4,890,250	229	1,332	22.3%	\$6,990,023
012584	01258403	Illinois Institute of Art (The)	Illinois Institute of Art -	180 North Wabash Avenue		Chicago	IL				0.0%	\$0
012584	01258405	Illinois Institute of Art (The)	Illinois Institute of Art (The) - The Art Institute of Michigan	28175 Cabot Drive		Novi	MI	\$5,739,276	318	1,603	26.2%	\$8,203,603
008878	00887800	Miami International University of Art & Design	Miami International University of Art & Design	1501 Biscayne Boulevard	Suite 100	Miami	FL	\$8,666,634	363	2,243	42.3%	\$17,658,215
008878	00887805	Miami International University of Art & Design	Miami International University of Art & Design - Art Inst. of Tampa	4401 North Himes Avenue	Suite 150	Tampa	FL	\$5,176,440	259	1,386	25.2%	\$10,546,866
008878	00887807	Miami International University of Art & Design	Miami International University of Art & Design - Art Institute Dallas	Two North Park	8080 Park Lane, Suite 100	Dallas	TX	\$2,753,242	362	853	13.4%	\$5,609,714
008878	00887808	Miami International University of Art & Design	Miami International University of Art & Design - Art Inst of Charlotte	Three Lake Pointe Plaza	2110 Water Ridge Parkway	Charlotte	NC	\$1,725,267	210	520	8.4%	\$3,515,221
008878	00887809	Miami International University of Art & Design	Miami International University of Art & Design - Art Inst Raleigh	410 Blackwell Street	Suite 10	Durham	NC	\$2,146,176	241	610	10.5%	\$4,372,822
013039	01303900	South University	South University	709 Mall Boulevard		Savannah	GA	\$184,702,627	6,504	22,940	63.5%	\$179,092,157
013039	01303904	South University	South University - West Palm Beach Campus	9801 Belvedere Road		Royal Palm Beach	FL	\$13,066,691	662	2,882	4.5%	\$12,669,781
013039	01303906	South University	South University - Montgomery	5355 Vaughn Road		Montgomery	AL	\$7,176,994	328	1,405	2.5%	\$6,958,988
013039	01303907	South University	South University - Columbia	9 Science Court		Columbia	SC	\$25,566,857	817	3,548	8.8%	\$24,790,246
013039	01303908	South University	South University - Tampa	4401 North Himes Avenue	Parkside at Tampa Bay Park	Tampa	FL	\$14,507,823	673	3,258	5.0%	\$14,067,138
013039	01303909	South University	South University - Art Institute of Atlanta	6600 Peachtree Dunwoody Road		Atlanta	GA				0.0%	\$0
013039	01303910	South University	South University - Richmond	2151 Old Brick Road		Glenn Allen	VA	\$11,615,799	502	2,097	4.0%	\$11,262,961
013039	01303911	South University	South University - Virginia Beach	301 Bendall Road		Virginia Beach	VA	\$7,047,058	331	1,552	2.4%	\$6,832,999
013039	01303914	South University	South University - Now	41555 Twelve Mile Road		Now	MI	\$8,129,273	341	1,407	2.8%	\$7,882,341
013039	01303915	South University	South University - Austin	1220 West Louis Henna Boulevard		Round Rock	TX	\$4,029,194	250	1,015	1.4%	\$3,906,804
013039	01303922	South University	South University - Cleveland	4743 Richmond Road		Warrensville Heights	OH	\$7,248,636	329	1,321	2.5%	\$7,028,454
013039	01303923	South University	South University - High Point	3975 Premier Drive		High Point	NC	\$5,594,967	235	1,084	1.9%	\$5,425,016
013039	01303926	South University	South University - Orlando ATS	4901 Vineland Road	Suite 140	Orlando	FL	\$2,053,106	75	150	0.7%	\$1,990,741
021799	02179900	Argosy University	Argosy University	601 South Lewis Street		Orange	CA	\$47,529,115	737	3,008	10.4%	\$36,120,317
021799	02179901	Argosy University	Argosy University - Twin Cities	1515 Central Parkway		Eagan	MN	\$2,692,559	934	3,701	5.8%	\$2,285,328
021799	02179902	Argosy University	Argosy University - Atlanta	980 Hammond Drive	Suite 100	Atlanta	GA	\$38,484,344	924	3,001	8.4%	\$29,246,636
021799	02179903	Argosy University	Argosy University - Washington D.C. Area	1550 Wilson Boulevard	Suite 600	Arlington	VA	\$26,275,359	369	1,353	5.7%	\$19,968,272
021799	02179905	Argosy University	Argosy University - Hawaii	400 A58 Tower	1001 Bishop Street	Honolulu	HI	\$3,059,528	497	2,285	5.5%	\$19,044,283
021799	02179907	Argosy University	Argosy University - Phoenix	2233 West Dunlap Avenue		Phoenix	AZ	\$130,363,187	4,662	20,164	28.5%	\$99,071,057
021799	02179908	Argosy University	Argosy University - San Francisco Bay Area	1005 Atlantic Avenue		Alameda	CA	\$10,260,036	139	710	2.2%	\$7,797,237
021799	02179909	Argosy University	Argosy University - Tampa	1403 North Howard Avenue		Tampa	FL	\$19,980,604	334	1,257	4.4%	\$15,184,488
021799	02179910	Argosy University	Argosy University - Maui Campus	The Wright Center	270 Hookahi, Suite 309	Wailuku	HI				0.0%	\$0
021799	02179911	Argosy University	Argosy University - Hilo Campus	The Ironworks Building	1266 Kamehameha Highway, Suite A-7	Hilo	HI				0.0%	\$0
021799	02179913	Argosy University	Argosy University - Seattle	2601 A Elliott Avenue		Seattle	WA	\$703,625	11	82	0.2%	\$534,728
021799	02179914	Argosy University	Argosy University - Nashville	100 Centerville Drive	Suite 225	Nashville	TN	\$7,818,722	218	789	1.7%	\$5,941,969
021799	02179918	Argosy University	Argosy University - Sarasota	5250 17th Street		Sarasota	FL	\$10,579,114	258	884	2.3%	\$8,039,724
021799	02179919	Argosy University	Argosy University - Dallas	5907 Lyndon B Johnson Frwy		Dallas	TX	\$7,898,958	299	1,067	1.7%	\$6,002,223
021799	02179921	Argosy University	Argosy University - Schaumburg	1000 Plaza Drive		Schaumburg	IL	\$12,355,565	155	694	2.7%	\$9,389,759
021799	02179928	Argosy University	Argosy University - Los Angeles	5230 Pacific Concourse		Los Angeles	CA	\$8,567,941	239	1,062	1.9%	\$6,511,309
021799	02179929	Argosy University	Argosy University - San Diego	1615 Murray Canyon Road	Suite 100	San Diego	CA	\$4,238,132	111	489	0.9%	\$3,220,819
021799	02179930	Argosy University	Argosy University - Denver	7600 E Cantan Avenue		Denver	CO	\$4,379,968	150	427	1.0%	\$3,328,609
021799	02179932	Argosy University	Argosy University - Inland Empire	3401 Centrelake Drive		Ontario	CA	\$9,479,170	279	1,183	2.1%	\$7,204,219
021799	02179935	Argosy University	Argosy University - Salt Lake City	121 Election Road	Suite 300	Draper	UT	\$3,540,748	115	364	0.8%	\$2,690,834
021799	02179936	Argosy University	Argosy University	225 North Michigan Avenue		Chicago	IL				0.0%	\$0
021799	02179937	Argosy University	Argosy University - Western State University College of Law	1 Banting Drive		Irving	CA	\$12,060,501	296	610	2.6%	\$9,165,521
021799	02179938	Argosy University	Argosy University - The Art Institute of California - Hollywood	5250 Lankershim Boulevard		North Hollywood	CA	\$10,969,759	550	3,107	2.4%	\$8,336,599
021799	02179940	Argosy University	Argosy University - At Hollywood (The Shield)	11128 Magnolia Avenue		North Hollywood	CA				0.0%	\$0
021799	02179943	Argosy University	Argosy University - The Art Institute of California - San Francisco	10 United Nations Plaza		San Francisco	CA	\$4,646,684	222	1,196	1.0%	\$3,531,303
021799	02179944	Argosy University	Argosy University - The Art Institute of California - Orange County	3601 West Sunflower Avenue		Santa Ana	CA	\$7,697,967	302	1,967	1.7%	\$5,850,162
021799	02179945	Argosy University	Argosy University - The Art Institute of California - Sacramento	2850 Gateway Oaks Drive	Suite 100	Sacramento	CA	\$5,681,837	261	1,511	1.2%	\$4,137,980
021799	02179947	Argosy University	Argosy University - The Art Institute of California - San Diego	7650 Mission Valley Road		San Diego	CA	\$7,333,851	341	1,970	1.6%	\$5,573,447
021799	02179948	Argosy University	Argosy University - The Art Institute of California - Inland Empire	674 East Brier Drive		San Bernardino	CA	\$12,314,815	562	3,473	2.7%	\$9,358,790
021799	02179949	Argosy University	Argosy University - UT National Guard Base, SLG	765 North 2200 West		Salt Lake City	UT				0.0%	\$0
021799	02179950	Argosy University	Argosy University - Phoenix ATS Chandler	1255 South Spectrum Boulevard		Chandler	AZ				0.0%	\$0
021799	02179951	Argosy University	Argosy University - Clay National Guard Center	1000 Halsey Avenue	Building 447	Marietta	GA				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
```

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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



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



For Internal FSA Use only - Unvalidated Data

Yellow = Closing

OPEID6	School Name	City	ST	Total Outstanding	Borrowers	Loans	Total Title IV (2016-2017)	Accreditor	# of Locations Including Main	# of Locations Closing	# of Locations 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 redesignation 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

Main OPEID	OPEID	Main Name
009270	00927002	Art Institute of Atlanta (The)
009270	00927003	Art Institute of Atlanta (The)
009270	00927004	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)
010195	01019501	Art Institute of Fort Lauderdale (The)
010195	01019502	Art Institute of Fort Lauderdale (The)
008350	00835000	Art Institute of Philadelphia (The)
008350	00835001	Art Institute of Philadelphia (The)
008350	00835002	Art Institute of Philadelphia (The)
040513	04051300	Art Institute of Phoenix (The)
040513	04051304	Art Institute of Phoenix (The)
040513	04051334	Art Institute of Phoenix (The)
040513	04051337	Art Institute of Phoenix (The)
040513	04051340	Art Institute of Phoenix (The)
007819	00781900	Art Institute of Portland (The)
007819	00781902	Art Institute of Portland (The)
007819	00781903	Art Institute of Portland (The)
012584	01258400	Illinois Institute of Art (The)
012584	01258401	Illinois Institute of Art (The)
012584	01258403	Illinois Institute of Art (The)
012584	01258405	Illinois Institute of Art (The)
013039	01303914	South University
013039	01303922	South University
013039	01303923	South University
021799	02179903	Argosy University
021799	02179908	Argosy University
021799	02179913	Argosy University
021799	02179914	Argosy University
021799	02179918	Argosy University
021799	02179919	Argosy University
021799	02179921	Argosy University
021799	02179929	Argosy University
021799	02179930	Argosy University
021799	02179932	Argosy University
021799	02179935	Argosy University
021799	02179938	Argosy University
021799	02179943	Argosy University
021799	02179944	Argosy University
021799	02179945	Argosy University

021799	02179947	Argosy University
021799	02179948	Argosy University
021799	02179949	Argosy University

Bold text = Main Location

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

Address 1	Address 2	City	State	Total Outstanding
The Ames Center	1820 North Fort Myer Drive	Arlington	VA	\$7,258,421
100 CNA Drive		Nashville	TN	\$5,717,278
24 North Market Street	The Carroll Building	Charleston	SC	\$3,775,970
1200 Lincoln Street		Denver	CO	\$7,856,880
675 South Broadway		Denver	CO	
1799 Southeast 17th Street		Fort Lauderdale	FL	\$8,083,900
1650 Southeast 17th Street		Fort Lauderdale	FL	
1600 Southeast 17th Street		Fort Lauderdale	FL	
1622 Chestnut Street		Philadelphia	PA	\$12,153,385
2300 Market Street		Philadelphia	PA	
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	
4839 Higbee Avenue NW		Canton	OH	
2665 Renfrew Street		Vancouver		
1122 NorthWest Davis Street		Portland	OR	\$7,664,052
722 NW Couch Street		Portland	OR	
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		Chicago	IL	
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	CO	\$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	
				<u>\$256,389,352</u>

Borrowers	Loans	Estimated Percent of Main	Estimated Funding (2016-2017)	Accreditor
310	1,913	17.0%	\$9,988,731	SACS
257	1,504	13.4%	\$7,867,876	SACS
211	1,055	8.8%	\$5,196,330	SACS
371	2,055	100.0%	\$8,737,824	HLC
		0.0%	\$0	HLC
349	2,177	100.0%	\$10,802,557	WASC (Formerly ACICS)
		0.0%	\$0	WASC (Formerly ACICS)
		0.0%	\$0	WASC (Formerly ACICS)
598	3,298	100.0%	\$15,127,626	Middle States
		0.0%	\$0	Middle States
		0.0%	\$0	Middle States
392	2,443	34.7%	\$17,769,673	WASC (Formerly ACICS)
366	2,056	28.7%	\$14,687,875	WASC (Formerly ACICS)
		0.0%	\$0	WASC (Formerly ACICS)
		0.0%	\$0	WASC (Formerly ACICS)
		0.0%	\$0	WASC (Formerly ACICS)
306	2,030	100.0%	\$8,145,769	NWCCU
		0.0%	\$0	NWCCU
		0.0%	\$0	NWCCU
515	2,944	47.9%	\$14,980,048	HLC
229	1,332	22.3%	\$6,990,023	HLC
		0.0%	\$0	HLC
318	1,603	26.2%	\$8,203,603	HLC
341	1,407	2.8%	\$7,882,341	SACS
329	1,321	2.5%	\$7,028,454	SACS
235	1,084	1.9%	\$5,425,016	SACS
369	1,353	5.7%	\$19,968,272	WASC
139	710	2.2%	\$7,797,237	WASC
11	82	0.2%	\$534,728	WASC
218	789	1.7%	\$5,941,969	WASC
258	884	2.3%	\$8,039,724	WASC
299	1,067	1.7%	\$6,002,223	WASC
155	694	2.7%	\$9,389,759	WASC
111	489	0.9%	\$3,220,819	WASC
150	427	1.0%	\$3,328,609	WASC
279	1,183	2.1%	\$7,204,219	WASC
115	364	0.8%	\$2,690,834	WASC
550	3,107	2.4%	\$8,336,599	WASC
222	1,196	1.0%	\$3,531,303	WASC
302	1,967	1.7%	\$5,850,162	WASC
261	1,511	1.2%	\$4,317,980	WASC

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

Green = Staying Open
Yellow = Closing

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

For Internal FSA Use only - Unvalidated Data

Main OPEID	OPEID	Main Name	Location Name	Address 1	Address 2	City	State	Total Outstanding	Borrowers	Loans	Estimated Percent of Main	Estimated Funding [2016-2017]
009270	00927000	Art Institute of Atlanta (The)	Art Institute of Atlanta (The)	6600 Peachtree Dunwoody Road	100 Embassy Row	Atlanta	GA	\$19,943,927	969	5,481	46.7%	\$27,445,987
009270	00927002	Art Institute of Atlanta (The)	Art Institute of Atlanta (The) - Art Institute of Washington (The)	The Ames Center	1820 North Fort Myer Drive	Arlington	VA	\$7,258,421	310	1,913	17.0%	\$9,988,731
009270	00927003	Art Institute of Atlanta (The)	Art Institute of Atlanta (The) - Art Institute of Tennessee-Nashville	100 CNA Drive		Nashville	TN	\$5,717,278	257	1,504	13.4%	\$7,867,876
009270	00927004	Art Institute of Atlanta (The)	Art Institute of Atlanta (The) - The Art Institute of Charleston	24 North Market Street	The Carroll Building	Charleston	SC	\$3,775,970	211	1,055	8.8%	\$5,196,310
009270	00927007	Art Institute of Atlanta (The)	Art Institute of Atlanta (The) - The Art Institute of Virginia Beach	4500 Main Street	Suite 100	Virginia Beach	VA	\$4,840,020	216	1,263	11.3%	\$6,660,630
020789	02078900	Art Institute of Colorado (The)	Art Institute of Colorado (The)	1200 Lincoln Street		Denver	CO	\$7,856,880	371	2,055	100.0%	\$8,737,824
020789	02078904	Art Institute of Colorado (The)	Art Institute of Colorado (The)	675 South Broadway		Denver	CO				0.0%	\$0
010195	01019500	Art Institute of Fort Lauderdale (The)	Art Institute of Fort Lauderdale (The)	1799 Southeast 17th Street		Fort Lauderdale	FL	\$8,083,900	349	2,177	100.0%	\$10,802,557
010195	01019501	Art Institute of Fort Lauderdale (The)	Art Institute of Fort Lauderdale (The) - Harbor Place Building	1650 Southeast 17th Street		Fort Lauderdale	FL				0.0%	\$0
010195	01019502	Art Institute of Fort Lauderdale (The)	Art Institute of Fort Lauderdale (The) - Harbor Place Building	1600 Southeast 17th Street		Fort Lauderdale	FL				0.0%	\$0
021171	02117100	Art Institute of Houston (The)	Art Institute of Houston (The)	4140 Southwest Freeway		Houston	TX	\$14,804,085	751	4,085	44.7%	\$17,918,874
021171	02117102	Art Institute of Houston (The)	Art Institute of Houston (The) - The Art Institute of Austin	101 W Louis Henna Blvd	Suite 100	Austin	TX	\$8,056,956	357	2,132	24.3%	\$9,752,145
021171	02117104	Art Institute of Houston (The)	Art Institute of Houston (The) - The Art Institute of San Antonio	10000 West Interstate Highway 10		San Antonio	TX	\$10,083,766	456	2,648	30.5%	\$12,205,397
008350	00835000	Art Institute of Philadelphia (The)	Art Institute of Philadelphia (The)	1822 Chestnut Street		Philadelphia	PA	\$12,153,385	598	3,298	100.0%	\$15,127,624
008350	00835001	Art Institute of Philadelphia (The)	Art Institute of Philadelphia (The)	2300 Market Street		Philadelphia	PA				0.0%	\$0
008350	00835002	Art Institute of Philadelphia (The)	Art Institute of Philadelphia (The)	1610 Chestnut Street		Philadelphia	PA				0.0%	\$0
040513	04051300	Art Institute of Phoenix (The)	Art Institute of Phoenix (The)	2233 West Dunlap Avenue		Phoenix	AZ	\$8,553,168	392	2,443	34.7%	\$11,769,673
040513	04051303	Art Institute of Phoenix (The)	Art Institute of Phoenix (The) - Art Institute of Las Vegas (The)	2350 Corporate Circle		Henderson	NV	\$8,623,775	425	2,401	35.0%	\$11,916,363
040513	04051304	Art Institute of Phoenix (The)	Art Institute of Phoenix (The) - Art Institute of Indianapolis (The)	3500 Depauw Boulevard		Indianapolis	IN	\$7,069,790	366	2,056	28.7%	\$14,687,875
040513	04051334	Art Institute of Phoenix (The)	Art Institute of Phoenix (The) - ATS Michigan City Humane	722 US Highway 212		Michigan City	IN				0.0%	\$0
040513	04051337	Art Institute of Phoenix (The)	Art Institute of Phoenix (The) - ATS N Canton Higbee	4839 Higbee Avenue NW		Canton	OH				0.0%	\$0
040513	04051340	Art Institute of Phoenix (The)	Art Institute of Phoenix (The) - The Art Institute of Vancouver	2665 Renfrew Street		Vancouver	BC				0.0%	\$0
007470	00747000	Art Institute of Pittsburgh (The)	Art Institute of Pittsburgh (The)	420 Boulevard of the Allies		Pittsburgh	PA	\$39,368,550	1,951	10,257	100.0%	\$59,384,466
007819	00781900	Art Institute of Portland (The)	Art Institute of Portland (The)	1322 NorthWest Davis Street		Portland	OR	\$7,664,052	306	2,030	100.0%	\$8,145,769
007819	00781902	Art Institute of Portland (The)	Art Institute of Portland (The) - Industrial Design Workshop	722 NW Couch Street		Portland	OR				0.0%	\$0
007819	00781903	Art Institute of Portland (The)	Art Institute of Portland (The) - Culinary Arts Facility	34 NW 8th Avenue		Portland	OR				0.0%	\$0
022913	02291300	Art Institute of Seattle (The)	Art Institute of Seattle (The)	2323 Elliott Avenue		Seattle	WA	\$8,167,998	388	2,074	100.0%	\$9,154,199
022913	02291302	Art Institute of Seattle (The)	Art Institute of Seattle (The)	2601 Elliott Avenue		Seattle	WA				0.0%	\$0
012584	01258400	Illinois Institute of Art (The)	Illinois Institute of Art (The)	350 North Orleans Street	Suite 136-L	Chicago	IL	\$10,480,106	515	2,944	47.9%	\$14,980,048
012584	01258401	Illinois Institute of Art (The)	Illinois Institute of Art (The) - The IL Institute of Art - Schaumburg	1000 Plaza Drive	Suite 100	Schaumburg	IL	\$4,890,250	229	1,332	22.3%	\$6,990,023
012584	01258403	Illinois Institute of Art (The)	Illinois Institute of Art -	180 North Wabash Avenue		Chicago	IL				0.0%	\$0
012584	01258405	Illinois Institute of Art (The)	Illinois Institute of Art (The) - The Art Institute of Michigan	28175 Cabot Drive		Novi	MI	\$5,739,276	318	1,603	26.2%	\$8,203,603
008878	00887800	Miami International University of Art & Design	Miami International University of Art & Design	1501 Biscayne Boulevard	Suite 100	Miami	FL	\$8,666,634	363	2,243	42.3%	\$17,658,215
008878	00887805	Miami International University of Art & Design	Miami International University of Art & Design - Art Inst. of Tampa	4401 North Himes Avenue	Suite 150	Tampa	FL	\$5,176,440	259	1,386	25.2%	\$10,546,966
008878	00887807	Miami International University of Art & Design	Miami International University of Art & Design - Art Institute Dallas	Two North Park	8080 Park Lane, Suite 100	Dallas	TX	\$2,753,242	362	853	13.4%	\$5,609,714
008878	00887808	Miami International University of Art & Design	Miami International University of Art & Design - Art Inst of Charlotte	Three Lake Pointe Plaza	2110 Water Ridge Parkway	Charlotte	NC	\$1,725,267	210	520	8.4%	\$3,515,221
008878	00887809	Miami International University of Art & Design	Miami International University of Art & Design - Art Inst Raleigh	410 Blackwell Street	Suite 10	Durham	NC	\$2,146,176	241	610	10.5%	\$4,372,822
013039	01303900	South University	South University	709 Mall Boulevard		Savannah	GA	\$184,702,627	6,504	22,940	63.5%	\$179,092,157
013039	01303904	South University	South University - West Palm Beach Campus	9801 Belvedere Road		Royal Palm Beach	FL	\$13,066,691	662	2,882	4.5%	\$12,669,781
013039	01303906	South University	South University - Montgomery	5355 Vaughn Road		Montgomery	AL	\$7,176,994	328	1,405	2.5%	\$6,958,988
013039	01303907	South University	South University - Columbia	9 Science Court		Columbia	SC	\$25,566,857	817	3,548	8.8%	\$24,790,246
013039	01303908	South University	South University - Tampa	4401 North Himes Avenue	Parkside at Tampa Bay Park	Tampa	FL	\$14,507,823	673	3,258	5.0%	\$14,067,138
013039	01303909	South University	South University - Art Institute of Atlanta	6600 Peachtree Dunwoody Road		Atlanta	GA				0.0%	\$0
013039	01303910	South University	South University - Richmond	2151 Old Brick Road		Glen Allen	VA	\$11,615,799	502	2,097	4.0%	\$11,262,961
013039	01303911	South University	South University - Virginia Beach	301 Bendall Road		Virginia Beach	VA	\$7,047,058	331	1,552	2.4%	\$6,832,999
013039	01303914	South University	South University - Now	41555 Twelve Mile Road		Now	MI	\$8,129,273	341	1,407	2.8%	\$7,882,341
013039	01303915	South University	South University - Austin	1220 West Louis Henna Boulevard		Round Rock	TX	\$4,029,194	250	1,015	1.4%	\$3,906,804
013039	01303922	South University	South University - Cleveland	4743 Richmond Road		Warrensville Heights	OH	\$7,248,636	329	1,321	2.5%	\$7,028,454
013039	01303923	South University	South University - High Point	3975 Premier Drive		High Point	NC	\$5,594,967	235	1,084	1.9%	\$5,425,016
013039	01303926	South University	South University - Orlando ATS	4901 Vineland Road	Suite 140	Orlando	FL	\$2,053,106	75	150	0.7%	\$1,990,741
021799	02179900	Argosy University	Argosy University	601 South Lewis Street		Orange	CA	\$47,529,115	737	3,008	10.4%	\$36,120,317
021799	02179901	Argosy University	Argosy University - Twin Cities	1515 Central Parkway		Eagan	MN	\$2,692,559	934	3,701	5.8%	\$2,285,328
021799	02179902	Argosy University	Argosy University - Atlanta	980 Hammond Drive	Suite 100	Atlanta	GA	\$38,484,344	924	3,001	8.4%	\$29,246,636
021799	02179903	Argosy University	Argosy University - Washington D.C. Area	1550 Wilson Boulevard	Suite 600	Arlington	VA	\$26,275,359	369	1,353	5.7%	\$19,968,272
021799	02179905	Argosy University	Argosy University - Hawaii	400 A58 Tower	1001 Bishop Street	Honolulu	HI	\$3,059,528	497	2,285	5.5%	\$19,044,283
021799	02179907	Argosy University	Argosy University - Phoenix	2233 West Dunlap Avenue		Phoenix	AZ	\$130,363,187	4,662	20,164	28.5%	\$99,071,057
021799	02179908	Argosy University	Argosy University - San Francisco Bay Area	1005 Atlantic Avenue		Alameda	CA	\$10,260,036	139	710	2.2%	\$7,797,237
021799	02179909	Argosy University	Argosy University - Tampa	1403 North Howard Avenue		Tampa	FL	\$19,980,064	334	1,257	4.4%	\$15,184,488
021799	02179910	Argosy University	Argosy University - Maui Campus	The Wright Center	270 Hookahi, Suite 309	Wailuku	HI				0.0%	\$0
021799	02179911	Argosy University	Argosy University - Hilo Campus	The Ironworks Building	1266 Kamehameha Highway, Suite A-7	Hilo	HI				0.0%	\$0
021799	02179913	Argosy University	Argosy University - Seattle	2601 A Elliott Avenue		Seattle	WA	\$703,625	11	82	0.2%	\$534,728
021799	02179914	Argosy University	Argosy University - Nashville	100 Centerville Drive	Suite 225	Nashville	TN	\$7,818,722	218	789	1.7%	\$5,941,969
021799	02179918	Argosy University	Argosy University - Sarasota	5250 17th Street		Sarasota	FL	\$10,579,114	258	884	2.3%	\$8,039,724
021799	02179919	Argosy University	Argosy University - Dallas	5907 Lyndon B Johnson Frwy		Dallas	TX	\$7,898,958	299	1,067	1.7%	\$6,002,223
021799	02179921	Argosy University	Argosy University - Schaumburg	1000 Plaza Drive		Schaumburg	IL	\$12,355,565	155	694	2.7%	\$9,389,759
021799	02179928	Argosy University	Argosy University - Los Angeles	5230 Pacific Concourse		Los Angeles	CA	\$8,567,941	239	1,062	1.9%	\$6,511,309
021799	02179929	Argosy University	Argosy University - San Diego	1615 Murray Canyon Road	Suite 100	San Diego	CA	\$4,238,132	111	489	0.9%	\$3,220,819
021799	02179930	Argosy University	Argosy University - Denver	7600 E Centennial Avenue		Denver	CO	\$4,379,968	150	427	1.0%	\$3,328,609
021799	02179932	Argosy University	Argosy University - Inland Empire	3401 Centrelake Drive		Ontario	CA	\$9,479,170	279	1,183	2.1%	\$7,204,219
021799	02179935	Argosy University	Argosy University - Salt Lake City	121 Election Road	Suite 300	Draper	UT	\$3,540,748	115	364	0.8%	\$2,690,834
021799	02179936	Argosy University	Argosy University	225 North Michigan Avenue		Chicago	IL				0.0%	\$0
021799	02179937	Argosy University	Argosy University - Western State University College of Law	1 Banting Drive		Irving	CA	\$12,060,501	296	610	2.6%	\$9,165,521
021799	02179938	Argosy University	Argosy University - The Art Institute of California - Hollywood	5250 Lankershim Boulevard		North Hollywood	CA	\$10,969,759	550	3,107	2.4%	\$8,336,599
021799	02179940	Argosy University	Argosy University - At Hollywood (The Shield)	11128 Magnolia Avenue		North Hollywood	CA				0.0%	\$0
021799	02179943	Argosy University	Argosy University - The Art Institute of California - San Francisco	10 United Nations Plaza		San Francisco	CA	\$4,646,684	222	1,196	1.0%	\$3,531,303
021799	02179944	Argosy University	Argosy University - The Art Institute of California - Orange County	3601 West Sunflower Avenue		Santa Ana	CA	\$7,697,967	302	1,967	1.7%	\$5,850,162
021799	02179945	Argosy University	Argosy University - The Art Institute of California - Sacramento	2850 Gateway Oaks Drive	Suite 100	Sacramento	CA	\$5,681,837	261	1,511	1.2%	\$4,137,980
021799	02179947	Argosy University	Argosy University - The Art Institute of California - San Diego	7650 Mission Valley Road		San Diego	CA	\$7,333,851	341	1,970	1.6%	\$5,573,447
021799	02179948	Argosy University	Argosy University - The Art Institute of California - Inland Empire	674 East Brier Drive		San Bernardino	CA	\$12,314,815	562	3,473	2.7%	\$9,358,790
021799	02179949	Argosy University	Argosy University - UT National Guard Base, SLC	765 North 2200 West		Salt Lake City	UT				0.0%	\$0
021799	02179950	Argosy University	Argosy University - Phoenix ATS Chandler	1255 South Spectrum Boulevard		Chandler	AZ				0.0%	\$0
021799	02179951	Argosy University	Argosy University - Clay National Guard Center	1000 Halsey Avenue	Building 447	Marietta	GA				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
```

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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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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

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