

#1

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, August 11, 2017 2:46:23 PM
Last Modified: Friday, August 11, 2017 2:47:42 PM
Time Spent: 00:01:18
IP Address: 136.181.195.9

Page 1

Q1 Please enter your contact information

Name	Mike Beamish
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Q2 A portion of the Fall Workshop for Regulators will focus on updates from each state in attendance. We would like to share this information, along with updates from states not in attendance, with all members. Please enter in any updates you would like to share with workshop attendees and membership (remember that this will include all three member categories). Updates could include proposed or actual changes to policies, procedures, or laws that affect regulated schools; SARA or other state authorization-related updates; or any other information you wish to include. The information will be compiled for the workshop and shared with all members afterward. If you need more space or have questions, please email jodie.markey@nasasps.org.

Distance Education Schools - Non-Degree Granting

Non-degree granting proprietary or trade schools, with no physical presence in Michigan, providing distance education to Michigan residents need to be licensed under the Proprietary Schools Act (1943 PA 148).

#2

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Monday, August 14, 2017 9:02:08 AM
Last Modified: Monday, August 14, 2017 9:10:34 AM
Time Spent: 00:08:26
IP Address: 168.39.166.1

Page 1

Q1 Please enter your contact information

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Q2 A portion of the Fall Workshop for Regulators will focus on updates from each state in attendance. We would like to share this information, along with updates from states not in attendance, with all members. Please enter in any updates you would like to share with workshop attendees and membership (remember that this will include all three member categories). Updates could include proposed or actual changes to policies, procedures, or laws that affect regulated schools; SARA or other state authorization-related updates; or any other information you wish to include. The information will be compiled for the workshop and shared with all members afterward. If you need more space or have questions, please email jodie.markey@nasasps.org.

The Texas legislature authorized a transcript repository for closed school academic records. This is to be a repository of last resort. If a degree-granting institution is part of a larger organization, transcripts from the closed locations should be maintained by the main campus or corporate location.

The Texas legislature also increased measures to ensure financial stability for degree-granting institutions. All institutions must provide information regarding finances. Documentation is required evidencing financial reserves, surety instruments, lines of credit or other financial instruments structured to allow the Texas Higher Education Coordinating Board to utilize the funds in order to reimburse students for any unearned tuition and fees.

Administrative rules and updated forms are being developed to incorporate these newly passed bills which are effective September 1, 2017.

#3

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Collector: Web Link 1 (Web Link)
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Last Modified: Monday, August 14, 2017 12:23:51 PM
Time Spent: 00:05:41
IP Address: 164.165.55.158

Page 1

Q1 Please enter your contact information

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Q2 A portion of the Fall Workshop for Regulators will focus on updates from each state in attendance. We would like to share this information, along with updates from states not in attendance, with all members. Please enter in any updates you would like to share with workshop attendees and membership (remember that this will include all three member categories). Updates could include proposed or actual changes to policies, procedures, or laws that affect regulated schools; SARA or other state authorization-related updates; or any other information you wish to include. The information will be compiled for the workshop and shared with all members afterward. If you need more space or have questions, please email jodie.markey@nasasps.org.

Idaho has no updates, changes or proposed changes at this time.

#4

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Collector: Web Link 1 (Web Link)
Started: Monday, August 14, 2017 12:44:05 PM
Last Modified: Monday, August 14, 2017 12:53:29 PM
Time Spent: 00:09:24
IP Address: 216.79.149.64

Page 1

Q1 Please enter your contact information

Name	Kim Verneuille
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Q2 A portion of the Fall Workshop for Regulators will focus on updates from each state in attendance. We would like to share this information, along with updates from states not in attendance, with all members. Please enter in any updates you would like to share with workshop attendees and membership (remember that this will include all three member categories). Updates could include proposed or actual changes to policies, procedures, or laws that affect regulated schools; SARA or other state authorization-related updates; or any other information you wish to include. The information will be compiled for the workshop and shared with all members afterward. If you need more space or have questions, please email jodie.markey@nasasps.org.

Revised Regulations Effective August 2017 - CPSCR is attempting to strengthen existing regulations. Most significant update to the regulations will be adding the requirement of a background check on all new applications and requiring annual enrollment and graduation outcomes.

We are presenting reviewing bonds and will be looking to increase the bond requirements for schools in FY2019.

MS is starting a pilot program on an online registration system with Cyanna this year. This will hopefully benefit the schools as well as the Mississippi office in productivity and record maintenance. With consistent budget cuts, we are having to maximize every penny with the staff on hand.

#5

COMPLETE

Collector: Web Link 1 (Web Link)
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Last Modified: Tuesday, August 15, 2017 7:54:07 AM
Time Spent: 00:45:13
IP Address: 166.67.66.242

Page 1

Q1 Please enter your contact information

Name	Sylvia Rosa-Casanova
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Phone Number	804-225-3399

Q2 A portion of the Fall Workshop for Regulators will focus on updates from each state in attendance. We would like to share this information, along with updates from states not in attendance, with all members. Please enter in any updates you would like to share with workshop attendees and membership (remember that this will include all three member categories). Updates could include proposed or actual changes to policies, procedures, or laws that affect regulated schools; SARA or other state authorization-related updates; or any other information you wish to include. The information will be compiled for the workshop and shared with all members afterward. If you need more space or have questions, please email jodie.markey@nasasps.org.

Virginia is proposing two new bills for the 2018 legislative session (begins January 2018). We are hoping to get buy-in from the general assembly this year to strengthen student protections. We learned a lot from the ITT closure and realized that we need to do more to protect Virginia residents when institutions close.

The first bill will require all degree-granting post-secondary schools providing distance learning to Virginia residents from a location outside of the Commonwealth to be a SARA participant. Virginia has never regulated on-line institutions since they do not have physical presence. This law, if passed, will provide a modicum of protection for Virginia students enrolled in on-line programs originating from other states. (We are aware of unaccredited institutions targeting Virginia residents.)

The second bill will enable us to create a student protection fund to provide refunds to students who suffer losses when an institution closes and to make provisions for expenses incurred by the agency for securing student records, providing teach-outs, administrative fees, storage fees, etc.

#6

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Time Spent: 00:41:25
IP Address: 168.166.80.206

Page 1

Q1 Please enter your contact information

Name	Leroy Wade
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Q2 A portion of the Fall Workshop for Regulators will focus on updates from each state in attendance. We would like to share this information, along with updates from states not in attendance, with all members. Please enter in any updates you would like to share with workshop attendees and membership (remember that this will include all three member categories). Updates could include proposed or actual changes to policies, procedures, or laws that affect regulated schools; SARA or other state authorization-related updates; or any other information you wish to include. The information will be compiled for the workshop and shared with all members afterward. If you need more space or have questions, please email jodie.markey@nasasps.org.

There have been no recent statutory or substantial policy changes in Missouri. We have made no changes to our SARA process but we have been busy with renewal applications in that area. As a fee funded, program we are concerned with the loss of a substantial number of large school operations within the state and the impact this may have on our ability to continue to fund the current level of operations. In the current environment, fee increases do not appear to be a viable option.

With regard to policy changes, we recently implemented a policy revision relating to continuing education programs. Our statute and regulations do not exempt continuing education courses/programs from certification requirements and our practice has been, because they are offered under the umbrella of an approved school, to require these courses to follow the same approval process and subject them to the same fee structure as other educational and training offerings. As schools added continuing education courses to their inventory, we implemented a specific definition of continuing education and streamlined the approval and fee process. The new process requires less detail for low cost and very short term continuing education offerings and provides a bulk fee approach (one fee for multiple courses). While the initial flood of such courses has subsided, we believe this approach better reflects the intent of the oversight program and provides greater flexibility for approved schools.

With all of the recent school closures and the issues relating to record recovery, retention, and storage, we are discussing policy revisions in this area. Under consideration is a requirement that some level of record storage be electronic and that, as part of a school close out plan, the school must provide copies of all records to the department in an acceptable electronic format. It would be helpful if recognized accrediting agency would also incorporate the same or similar requirement in order to provide a more universal response to this issue.

#7

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IP Address: 170.142.177.57

Page 1

Q1 Please enter your contact information

Name	Julie Woodruff
Organization	Tennessee Higher Education Commission
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Q2 A portion of the Fall Workshop for Regulators will focus on updates from each state in attendance. We would like to share this information, along with updates from states not in attendance, with all members. Please enter in any updates you would like to share with workshop attendees and membership (remember that this will include all three member categories). Updates could include proposed or actual changes to policies, procedures, or laws that affect regulated schools; SARA or other state authorization-related updates; or any other information you wish to include. The information will be compiled for the workshop and shared with all members afterward. If you need more space or have questions, please email jodie.markey@nasasps.org.

Since our last update, the Division of Postsecondary State Authorization (DPSA) of the Tennessee Higher Education Commission (THEC) has continued with its work to implement the Tennessee Higher Education Authorization Act of 2016 (HEAA). During the implementation, we have worked diligently to revise our rules, overhaul our existing forms/applications and create new ones when necessary, and adjust workflow to better suit our limited resources. We anticipate further revisions to the rules although any changes will likely be limited to addressing particular issues that have been raised during the implementation of the HEAA. Additionally, we have worked to be electronic-friendly. We have converted many of our paper files to electronic forms and moved them to an electronic file room. Additionally, we are working on electronic forms and applications along with online payment functionality.

#8

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Last Modified: Wednesday, August 23, 2017 5:40:12 PM
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IP Address: 198.167.32.134

Page 1

Q1 Please enter your contact information

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Q2 A portion of the Fall Workshop for Regulators will focus on updates from each state in attendance. We would like to share this information, along with updates from states not in attendance, with all members. Please enter in any updates you would like to share with workshop attendees and membership (remember that this will include all three member categories). Updates could include proposed or actual changes to policies, procedures, or laws that affect regulated schools; SARA or other state authorization-related updates; or any other information you wish to include. The information will be compiled for the workshop and shared with all members afterward. If you need more space or have questions, please email jodie.markey@nasasps.org.

Respondent skipped this question

#9

COMPLETE

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Page 1

Q1 Please enter your contact information

Name	Jim Parker
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Q2 A portion of the Fall Workshop for Regulators will focus on updates from each state in attendance. We would like to share this information, along with updates from states not in attendance, with all members. Please enter in any updates you would like to share with workshop attendees and membership (remember that this will include all three member categories). Updates could include proposed or actual changes to policies, procedures, or laws that affect regulated schools; SARA or other state authorization-related updates; or any other information you wish to include. The information will be compiled for the workshop and shared with all members afterward. If you need more space or have questions, please email jodie.markey@nasasps.org.

Washington Workforce Training and Education Coordinating Board
 Workforce Board's Consumer Protection Services Unit Activities Overview for 2016

- The Workforce Board's Consumer Protection Services Unit oversees Private Career Schools <http://wtb.wa.gov/pcs.asp> and VA Educational Programs <http://www.wtb.wa.gov/veterans.asp>.
- The Consumer Protection Services Unit consists of six staff: Three Program Specialists assigned to work with private career schools; two Veterans Education Consultants that under federal law evaluate and approve education programs for veterans using G.I. Bill benefits; and one Administrative Assistant that supports unit staff.
- Although this number varies, there are currently 303 licensed private career schools within Washington offering education programs below the degree level, both certificate and diploma, and 18 out-of-state schools, serving an estimated 38,000 students. Degree granting private career institutions are regulated by our sister agency, the Washington Student Achievement Council (Sam Loftin and Tivoli Sharp).
- Veterans Education staff last year (Federal FY16) approved 910 degree programs (non-transfer degrees) offered at 237 institutions of higher learning, and 1,276 non-degree programs at 99 private career schools.
- The unit also helps manage Washington's Eligible Training Provider List. This list, required by the U.S. Department of Labor in every state, experienced minor regulatory changes after the passage of the Workforce Innovation and Opportunity Act (WIOA) of 2014. In Washington, the Workforce Board sets minimum performance thresholds for education programs to be included on the list and qualify for federal training dollars. Agency research staff evaluates program performance each year and the list is pushed out to the public through the Washington Career Bridge site (www.careerbridge.wa.gov), which is managed by Workforce Board staff.

- The Career Bridge website includes the wide range of education programs offered by private career schools licensed by Consumer Protection Services Unit staff, along with associate's degrees and bachelor's degrees, master's degrees, and even apprenticeships. The site is used every day by job counselors in Washington's WorkSource centers, by middle and high school students, teachers, and counselors; at college career centers, and by the general public. As mentioned above, Career Bridge houses the state's Eligible Training Provider List, but also includes additional education programs that are not on this list, for a total of 6,500 Washington education programs. When data is available, the site provides performance results on employment and earnings of recent graduates. Last year, the site recorded 7 million page views.
- Within the past year focus has been on educational outreach and technical assistance, with staff working directly with the schools to ensure compliance with regulatory standards. Staff conducted 135 school visits and inspections. This includes: 78 private career school inspections and technical assistance, 25 VA compliance audits, and 32 schools with a combination of state licensing and VA. Since January 2015, 80% of schools have been visited at least once.
- Schools renew their licenses annually with the Workforce Board. Licensing fees and deposits collected from the schools fund the Tuition Recovery Trust Fund. This fund helps students recover their financial investment in the event of an unexpected school closure. Funds collected from the schools are calculated based on a fee schedule of established ranges tuition revenue the school received. (WAC 490-105-070 and 084).
- Through increased focus and efforts with onsite school compliance visits and inspections, technical assistance, and compliance training workshops, filed student complaints have declined from 35 in FY 16 to 21 for FY16, a 40% decrease. Note: ITT Technical Institute did not offer non-degree programs within WA and our agency does not oversee Cosmetology Schools. Enforcement actions taken 2 revocations; 2 school suspensions, 3 program suspensions (VA), 2 program withdraws (VA), 4 provisional/probationary licenses.
- Legislation that took effect in July 2017, (HB5022) requires public and private postsecondary institutions to notify enrolled students who have applied for financial aid about the education loans the institution offers. Effective July 2018 institutions must ensure each enrolled student is provided financial information and counseling about the student loans taken out by the student. (This includes potential total payoff and monthly repayment amounts of loan, principal and interest, and the percentage of the aggregate federal direct loan borrowing limit applicable to the student's program of study). In addition, institutions shall provide consumer information about the differences between private student loans and federal student loans. Education institutions will be required to report compliance to each respective governing agency.
- In 2016, the Washington Legislature, concerned about recent school closures and actions taken by the U.S. Dept. of Education, funded an independent study and analysis ("situation assessment"), of the private career school industry and regulatory sector. The study was conducted by the Ruckelshaus Center, Washington State University, to arrive at recommendations regarding regulatory overlaps, and gaps, in jurisdiction of for-profit private career schools in Washington. A report that included findings and recommendations was published in December 2016 and is available at <http://ruckelshauscenter.wsu.edu/projects/>. The report highlights the need for enhanced reporting of education program performance outcomes, along with the need for students to receive more information and support to make more informed decisions about their education and career choices.
- Starting in January 2018, private career schools will need to provide written student disclosure at enrollment on "How to File a Complaint" with state. The disclosure is incorporated within the enrollment contract.

Feel free to contact me if you have any questions. Jim Parker jim.parker@wtb.wa.gov Tel. 360-709-4625.

#10

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Collector: Web Link 1 (Web Link)
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IP Address: 150.176.9.254

Page 1

Q1 Please enter your contact information

Name	Rhesa Rudolph
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Q2 A portion of the Fall Workshop for Regulators will focus on updates from each state in attendance. We would like to share this information, along with updates from states not in attendance, with all members. Please enter in any updates you would like to share with workshop attendees and membership (remember that this will include all three member categories). Updates could include proposed or actual changes to policies, procedures, or laws that affect regulated schools; SARA or other state authorization-related updates; or any other information you wish to include. The information will be compiled for the workshop and shared with all members afterward. If you need more space or have questions, please email jodie.markey@nasasps.org.

Florida has joined SARA. The 2017 Florida Legislature passed a bill authorizing Florida to join "a reciprocity agreement." Representatives of the four postsecondary educational sectors in the state convened in June, 2017, voted to join SARA, and formed the Postsecondary Reciprocal Distance Education Coordinating Council, which will serve as the state's portal entity. The SREB Steering Committee approved Florida's application in early August, subject to finalization of rules. Florida likely will begin accepting institutional applications in late fall.

Administrative support for SARA is with the Florida Commission for Independent Education. Two full-time positions were allocated for purposes of implementing SARA and a financial report must be filed annually with the Governor and Legislature justifying the institutional fees imposed and staff needed. Institutional fees are capped by statute at \$1,500, \$3,000 and \$4,500 based on total FTE enrollment. Further, Florida's Governor is authorized to request the council to convene to reconsider the state's participation in a reciprocity agreement and can withdraw the state from participation, regardless of the council's recommendation. (See Chapter 2017-87, Laws of Florida).

The Commission for Independent Education is proposing legislation for the 2018 legislative session to protect consumers by strengthening licensure standards and requirements and facilitating access to funds necessary to carry out the commission's responsibilities with regard to institutions that close.

#11

COMPLETE

Collector: Web Link 1 (Web Link)
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Last Modified: Thursday, September 07, 2017 11:58:48 AM
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IP Address: 167.7.10.242

Page 1

Q1 Please enter your contact information

Name	Lane Goodwin
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Q2 A portion of the Fall Workshop for Regulators will focus on updates from each state in attendance. We would like to share this information, along with updates from states not in attendance, with all members. Please enter in any updates you would like to share with workshop attendees and membership (remember that this will include all three member categories). Updates could include proposed or actual changes to policies, procedures, or laws that affect regulated schools; SARA or other state authorization-related updates; or any other information you wish to include. The information will be compiled for the workshop and shared with all members afterward. If you need more space or have questions, please email jodie.markey@nasasps.org.

The SCCHE does not currently have plans to advance statutory or regulatory changes this legislative session. Should there be regulatory updates in the future, they will most likely include a student tuition recovery fund, provisional licensure, and outcomes measures.

Staff intends to update policies regarding assessment (particularly requirements for non-degree institutions), distance education, changes in ownership (application processes), and strengthening records maintenance requirements. Applications for degree-granting activity may be further revised to reflect forthcoming changes to public institution program proposals.

Our first year of membership in SARA has gone well, with 32 institutions participating since SC began accepting applications in July 2016.

The Commission is in the process of adopting a public agenda for higher education in the state.

#12

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Collector: Web Link 1 (Web Link)
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Last Modified: Friday, September 08, 2017 1:19:28 AM
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IP Address: 12.237.105.253

Page 1

Q1 Please enter your contact information

Name	Sam Loftin
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Phone Number	360-753-7866

Q2 A portion of the Fall Workshop for Regulators will focus on updates from each state in attendance. We would like to share this information, along with updates from states not in attendance, with all members. Please enter in any updates you would like to share with workshop attendees and membership (remember that this will include all three member categories). Updates could include proposed or actual changes to policies, procedures, or laws that affect regulated schools; SARA or other state authorization-related updates; or any other information you wish to include. The information will be compiled for the workshop and shared with all members afterward. If you need more space or have questions, please email jodie.markey@nasasps.org.

The Washington Student Achievement Council regulates Degree-Granting Institutions in Washington State. We have 2 primary staff focused on degree authorization – Sam Loftin, who was hired in the Spring to replace Mike Ball, and Tivoli Sharp, who was hired as the Program Manager approximately one year ago.

In response to an independent study and analysis of the private career school industry and regulatory sector in Washington State, the WSAC has engaged in a series of meetings this year with our partner regulatory agencies, including the Workforce Training and Education Coordinating Board and the Department of Licensing, to establish more effective and collaborative practices in the regulation of for-profit private career schools. As a result of those meetings and the report that emerged from the independent study, the WSAC and the Workforce Board have developed a joint legislative proposal that seeks funding for the following initiatives:

- Establishment of a “student protection fund” that authorized schools will contribute to and that will allow for the reimbursement of tuition and fees in certain circumstances. The proposal also allows the WSAC the discretion to use funds to obtain and manage student records in the event of a closure event;
- Development of a shared application/ data portal that will allow all schools to submit applications, renewals, fee payments, and required data in a centralized location and in a consistent manner, even for institutions with programs regulated by multiple entities;
- Development of a common “student complaint portal” for all students that will direct the complaint to the appropriate regulatory entity;
- Creation of a formalized interagency workgroup that will meet quarterly and that will develop coordinated processes for school closures.

In addition to these legislative proposal items, the WSAC is also examining its fee schedule and hopes to make adjustments that will increase funding enough to support the addition of a .5 FTE so that we can engage in increased compliance visits, particularly with respect to renewal applications and schools at risk of closure.

#13

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Time Spent: 01:07:51
IP Address: 205.221.94.155

Page 1

Q1 Please enter your contact information

Name	Carolyn Small
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Q2 A portion of the Fall Workshop for Regulators will focus on updates from each state in attendance. We would like to share this information, along with updates from states not in attendance, with all members. Please enter in any updates you would like to share with workshop attendees and membership (remember that this will include all three member categories). Updates could include proposed or actual changes to policies, procedures, or laws that affect regulated schools; SARA or other state authorization-related updates; or any other information you wish to include. The information will be compiled for the workshop and shared with all members afterward. If you need more space or have questions, please email jodie.markey@nasasps.org.

Registration Fee Update:

Rule changes effective May 27, 2016 impose increased fees for schools that must apply for initial registration in Iowa and for currently registered schools that must maintain their Iowa registration. In addition, the new rules changed the timing of fee payments due from Iowa-registered schools.

Initial Registration Application Fee: \$5,000

Registration Renewal Application Fee: \$0

Each currently registered school will pay the Commission a new annual fee due by July 15 of each calendar year. The fee is determined by the institution's full-time equivalent (FTE) enrollment reported to IPEDS, as follows:

- Under 2,500 FTE – \$2,000
- 2,500 to 9,999 FTE – \$4,000
- 10,000 FTE or more – \$6,000

The Commission will invoice registered schools approximately 90 days in advance of the July 15 due date.

The Commission is delaying enforcement of the annual fee payment for schools that were currently registered, or that had an initial or renewal application pending upon the effective date of the rule change. The Commission provides more detailed information about the implementation of the annual registration fee payment on its website at <https://www.iowacollegeaid.gov/content/postsecondary-registration>. Iowa-registered schools with specific questions about how and when the annual fee payment impacts that particular school should contact Postsecondary Registration Administrator Carolyn Small at 515 725 3413 or carolyn.small@iowa.gov.

Proposed Administrative Rule Changes:

The Commission plans to release proposed administrative rules for public comment in late 2017.

These proposed rules may include the following topics:

Clarifying the application of the Iowa tuition refund policy for students who withdraw from for-profit schools in cases when the school's program is offered in clock hours, or the program is self-paced or competency-based.

Establishing standards for an Irrevocable Letter of Credit, which the Commission will propose to require of a registered school under certain circumstances.

Codifying existing policies for determining the eligibility of an unaccredited school of religious study to operate in Iowa or offer programs to lowans under an exemption from registration.

Establishing programmatic standards for nondegree career and technical schools operating under an exemption from registration in cases when the school's program prepares a student for an occupation that requires a professional license or certification mandated by an agency of the State of Iowa.

Requiring Iowa SARA-approved, for-profit schools to apply the Iowa tuition refund policy to out-of-state residents who withdraw from the school's distance education programs.

Establishing standards for Commission consideration of an Iowa SARA applicant whose most recent official financial responsibility composite score is between 1.0 and 1.49, Fee Update:

Rule changes effective May 27, 2016 impose increased fees for schools that must apply for initial registration in Iowa and for currently registered school that must maintain their Iowa registration. In addition, the new rules changed the timing of fee payments due from currently registered schools.

Initial Registration Application Fee: \$5,000

Registration Renewal Application Fee: \$0

Each currently registered school will pay the Commission a new annual fee due by July 15 of each calendar year. The fee is determined by the institution's full-time equivalent (FTE) enrollment reported to IPEDS, as follows:

- Under 2,500 FTE – \$2,000
- 2,500 to 9,999 FTE – \$4,000
- 10,000 FTE or more – \$6,000

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Proposed Administrative Rule Changes:

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These proposed rules may include the following topics:

Clarifying the application of the state tuition refund policy for students who withdraw from for-profit schools in cases when the school's program is offered in clock hours, or the program is self-paced or competency-based.

Establishing standards for an Irrevocable Letter of Credit, which the Commission will propose to require of a registered school under certain circumstances.

Codifying existing policies for determining the eligibility of an unaccredited school of religious study to operate in Iowa or offer programs to lowans under an exemption from registration.

Establishing programmatic standards for nondegree career and technical schools operating under an exemption from registration in cases when the school's program prepares a student for an occupation that requires a professional license or certification mandated by an agency of the State of Iowa.

an agency of the State of Iowa.

Requiring Iowa SARA-approved, for-profit schools to apply the Iowa tuition refund policy to out-of-state residents who withdraw from the school's distance education programs.

Establishing standards for Commission consideration of an Iowa SARA applicant whose most recent official financial responsibility composite score is between 1.0 and 1.49, including the imposition of an Irrevocable Letter of Credit as a condition of the school's initial or renewal approval to participate in SARA.
