

Reading



July 16, 2015

Mr. David Ray
President
The Illinois Institute of Art
350 N. Orleans St., Ste. 136-L
Chicago, IL 60654-1593

Certified Mail Return Receipt Requested
7012 1640 0000 0216 4116

RE: **Final Program Review Determination**
OPE ID: 01258400
PRCN: 201330528303

Dear Mr. Ray:

The U.S. Department of Education's (Department's) Chicago/Denver School Participation Division issued a program review report on September 3, 2014 covering the Illinois Institute of Art's (IIA's) administration of programs authorized by Title IV of the Higher Education Act of 1965, as amended, 20 U.S.C. §§ 1070 et seq. (Title IV, HEA programs), for the 2011-2012 and 2012-2013 award years. IIA's response was received on October 13, 2014. A copy of the program review report (and related attachments) and the institution's response are attached. Any supporting documentation submitted with the response is being retained by the Department and is available for inspection by IIA upon request. Additionally, this Final Program Review Determination (FPRD), related attachments, and any supporting documentation may be subject to release under the Freedom of Information Act (FOIA) and can be provided to other oversight entities after this FPRD is issued.

Purpose:

Final determinations have been made concerning all of the outstanding findings of the program review report. The purpose of this letter is to close the review.

This FPRD contains a finding regarding IIA's failure to comply with the requirements of the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (the Clery Act) in Section 485(f) of the HEA, 20 U.S.C. § 1092(f), and the Department's regulations in 34 C.F.R. §§ 668.41 and 668.46. Since a Clery Act finding does not result in a financial liability, such a finding may not be appealed.

Liabilities totaling \$1,850 have been repaid by IIA. No further action is required.

Federal Student Aid
An OFFICE of the U.S. DEPARTMENT of EDUCATION
Chicago/Denver School Participation Division
500 W. Madison, Suite 1576 Chicago, Illinois 60661
StudentAid.gov

Protection of Personally Identifiable Information (PII):

PII is any information about an individual which can be used to distinguish or trace an individual's identity (some examples are name, social security number, date and place of birth). The loss of PII can result in substantial harm, embarrassment, and inconvenience to individuals and may lead to identity theft or other fraudulent use of the information. To protect PII, the finding in the attached report does not contain any student PII. Instead, the finding references students only by a student number created by Federal Student Aid. The student numbers were assigned in Appendix A, Student Review Sample. The appendix was encrypted and sent separately to the institution via e-mail.

Record Retention:

Program records relating to the period covered by the program review must be retained until the later of: resolution of the loans, claims or expenditures questioned in the program review; or the end of the retention period otherwise applicable to the record under 34 C.F.R. §§ 668.24(e)(1), (e)(2), and (e)(3).

The Department expresses its appreciation for the courtesy and cooperation extended during the review. If the institution has any questions regarding this letter, please contact Eric Schmidt at 312-730-1723.

Sincerely,

(b)(6)


Douglas Parrott
Division Director

Enclosure:

Protection of Personally Identifiable Information
Program Review Report (and appendices)
Final Program Review Determination Report (and appendices)

cc: Mr. Terrence Leppellere, Financial Aid Administrator
Ms. Amada Winters, Illinois Board of Higher Education
Dr. Stephanie Brzuzy, North Central Assoc of Colleges and Schools,
the Higher Learning Commission
Department of Defense
Department of Veterans Affairs
Consumer Financial Protection Bureau

Prepared for

The Illinois Institute of Art



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OPE ID 01258400
PRCN 201330528303

Prepared by
U.S. Department of Education
Federal Student Aid
Chicago/Denver School Participation Team

Final Program Review Determination

July 16, 2015

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A. Institutional Information

The Illinois Institute of Art
350 N. Orleans St., Ste. 136-L
Chicago, IL 60654-1593

Type: Proprietary

Highest Level of Offering: Bachelor's Degrees

Accrediting Agency: North Central Association of Colleges and Schools

Current Student Enrollment: Approximately 3,447 (2015)

% of Students Receiving Title IV: Approximately 88% (2015)

Title IV Participation (NSLDS):

	<u>2013/14 Award Year</u>
William D. Ford Federal Direct Loan Program	\$62,314,106
Federal Pell Grant	15,179,725
Federal Supplemental Educational Opportunity Grant Program	900,541
Federal Work-Study Program	412,950

Default Rate – Direct Loan: 2011 – 12.6%
2010 – 10.8%
2009 – 10.4%

Default Rate – Perkins: Does not participate

B. Scope of Review

The U.S. Department of Education (the Department) conducted a program review at The Illinois Institute of Art (IIA) from May 13, 2013 to May 16, 2013. The review was conducted by Mitch Cary, Rosa Reth and Tonee Buwana.

The focus of the review was to determine IIA's compliance with the statutes and federal regulations as they pertain to the institution's administration of Title IV programs. The review consisted of, but was not limited to, an examination of IIA's policies and procedures regarding institutional and student eligibility, individual student financial aid and academic files, attendance records, student account ledgers, and fiscal records.

A sample of 30 files was identified for review from the 2011/12 and 2012/13 award years. The files were selected randomly from a statistical sample of the total population receiving Title IV, HEA program funds for each award year. Appendix A lists the names and partial social security numbers of the students whose files were examined during the program review. A program review report was issued on September 3, 2014.

Disclaimer:

Although the review was thorough, it cannot be assumed to be all-inclusive. The absence of statements in the report concerning IIA's specific practices and procedures must not be construed as acceptance, approval, or endorsement of those specific practices and procedures. Furthermore, it does not relieve IIA of its obligation to comply with all of the statutory or regulatory provisions governing the Title IV, HEA programs.

C. Findings and Final Determinations

Resolved Findings

Findings 2-3: IIA has taken the corrective actions necessary to resolve findings 2-3 of the program review report. Therefore, these findings may be considered closed. Findings requiring further action by IIA are discussed below.

Resolved Finding with Comments

The following program review finding has been resolved by the institution and may be considered closed. This finding is included solely for the purpose of discussing resolution of the finding.

Finding 1: Fire Awareness Requirements Not Met – Multiple Violations

Citation:

As of October 1, 2010, the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (Clery Act) and the Department's regulations require that all institutions receiving Title IV, HEA funds that maintain an on-campus student housing facility must, by October 1 of each year, prepare, publish and distribute to its current students and employees through appropriate publications and mailings, an Annual Fire Safety Report (AFSR) that contains, at a minimum, all of the statistical and policy elements described in 34 C.F.R. § 668.49(b). These institutions must disclose fire statistics for each on-campus student residential facility for the three most-recent calendar years. An institution's statistics must accurately and completely identify the number of on-campus fires and the cause of each fire, the number of persons who sustained fire-related injuries that resulted in treatment at a medical facility (including on-campus health centers), the number of fire-related deaths, and the dollar value of property damage caused by such fires. 34 C.F.R. § 668.49(c).

In addition, the AFSR must include several fire safety information disclosures covering topics such as the type(s) of fire safety systems that are used in each student housing facility, the number of fire drills that were conducted during the previous calendar year, any institutional policies, procedures, and programs regarding: 1) the use and/or possession of portable electrical appliances; 2) smoking and the use/presence of open flames in student housing facilities; 3) evacuation procedures to be followed in the case of a fire; 4) fire safety education and training programs; 5) the institutional official(s) and departments to whom students and employees should report the occurrence of fires so that those incidents can be included in the institution's annual fire statistics; and, 6) any plans for future improvements to the institution's fire safety program. 34 C.F.R. § 668.49(b).

The AFSR must be published and distributed as a materially-complete, comprehensive publication. If an institution chooses to combine its Annual Security Report and publish them as a single document, then the title of both reports must conspicuously appear on the cover page. Acceptable means of delivery include U.S. Mail, hand delivery, or campus mail distribution to the individual or posting on the institution's website. If an institution chooses to distribute its report by posting to an internet or intranet site, the institution must, by October 1 of each year, distribute a notice to all current students and

employees that includes a direct link to each report (exact electronic address), a description of its contents, as well as an advisement that a paper copy will be provided upon request. The Department's regulations also require participating institutions to provide a notice to all prospective students and employees that includes a statement about the AFSR's availability, the content of each report, and the exact electronic address of each report, if posted to an internet or intranet site. This notice must also advise interested parties how to obtain a paper copy of the AFSR.

Finally, an institution is required to submit its campus crime and fire statistics to the Secretary on an annual basis. 34 C.F.R. § 668.41(e)(1)-(6).

Noncompliance:

IIA violated multiple provisions of the Clery Act fire safety requirements. The most serious of these violations pertain to the institution's failure to publish an AFSR and actively distribute such a report to enrolled students and current employees. The Department's review indicates that IIA did not publish and distribute an AFSR for the 2011/12 and 2012/13 award years and this failure to comply with the federal guidelines has persisted since the fire safety requirements were added to the Clery Act in 2010.

IIA provides on-campus housing for its students. The housing is not owned by the institution, but it is controlled by the institution. Since the housing is in the same reasonably contiguous geographic area and is used in direct support of the institution's educational purposes IIA is required by the Clery Act to publish and distribute an AFSR and implement a system of complaint fire safety policies and procedures.

Failure to publish an accurate and complete AFSR and actively distribute it to students and employees deprives them of important fire safety information to which they are entitled. Access to this information permits campus community members, especially those who live in campus housing, to make well-informed decisions about where to work and study and empowers them to play a more active role in their own safety and security.

Required Action:

As a result of these violations, IIA must develop and implement internal policies and procedures that will govern the preparation, publication, and distribution of the AFSR and that will ensure that all fire safety operations at IIA will be carried out in accordance with the Clery Act going forward. In addition, the new procedures also must articulate how prospective students and employees will be notified of the AFSR's availability. Moreover, the institution must establish and maintain a compliant fire log.

Using its new and revised policies as a guide, IIA must prepare and publish an accurate and complete AFSR that includes all of the statistical disclosures and policy, procedure

and programmatic information required by 34 C.F.R. § 668.49(b). A copy of the institution's new and revised policies and procedures and its draft AFSR must accompany IIA's response to this program review report. Once the new AFSR is evaluated by the review team for accuracy and completeness, IIA will be required to actively distribute it to all current students and employees in accordance with 34 C.F.R. §668.41(e).

Finally, IIA will be required to provide documentation to the Department evidencing the distribution as well as a certification statement attesting to the fact that the materials were distributed in accordance with the Clery Act. This certification must also affirm that the institution understands its Clery Act fire safety obligations and that it has taken all necessary corrective actions to ensure that these violations do not recur.

As noted above, the exceptions identified in this finding constitute serious violations of the Clery Act's fire safety requirements that by their nature cannot be cured. There is no way to truly "correct" a violation of this type once it occurs. IIA will be given an opportunity to publish and distribute an accurate and complete AFSR and by doing so, will begin the process of bringing its overall fire safety program into compliance with the Clery Act as required by its Program Participation Agreement. While enhanced safety is the Department's primary focus, we note that such improvements also may result in a better risk management environment for the institution. Nevertheless, IIA is advised that these remedial measures cannot and do not diminish the seriousness of these violations nor do they eliminate the possibility that the Department will impose an adverse administrative action and/or require other corrective actions as a result.

Based on an evaluation of all available information including IIA's response, the Department will determine if additional actions will be required and will advise the institution accordingly in the FPRD.

IIA's Response:

IIA did not concur with the finding on the grounds that most of their student housing facilities did not meet the regulatory definition of "on-campus" housing, as most of their residence halls are not located on or next to the campus.

The school published the AFSR for the Schaumburg and Ohio campuses in our 2014 report, as these were the only campuses within IIA that provide school-sponsored housing that might be located on or next to the campus.

Final Determination:

Finding #1 of the program review report cited IIA for multiple violations of the Clery Act's fire safety requirements. The most serious of these violations was the institution's

apparent failure to produce and distribute an accurate and complete AFSR that includes all of the statistical disclosures and statements of policy and procedure required by 34 C.F.R. § 668.49(b) and 34 C.F.R. § 668.49(c), respectively. As a result of these violations, IIA was required to review and revise its new and existing internal policies and procedures that govern the production and distribution of its ASRs and AFSRs and to develop and implement any new policies and procedures as needed to ensure that all fire safety operations are carried out in full compliance with the Clery Act going forward.

In its official response, IIA stated that it did not concur with the finding and provided a rationale for its position. Department officials held a conference call with officials from IIA's parent company, EDMC to discuss the response and the institution's future compliance efforts. During the meeting, EDMC provided information about its student housing program and its campus safety operation. Department officials also explained the applicability of the Clery Act's definition of a "campus" and of an "on-campus student residential facility." Following this meeting, Department officials reviewed the documents and other information provided by EDMC. Based on that review, it was determined that IIA did not violate the fire safety requirements during the period covered by the program review. Based on these facts, the violations noted in the noncompliance section of the initial finding are not sustained.

The review team also determined that based on current Department guidance that several campuses of the Art Institute were required to produce a 2014 AFSR and to actively distribute the report to enrolled students and current employees. The review team confirmed that these campuses did produce and distribute 2014 AFSRs in accordance with the Department's guidance. As such, the Department has accepted the College's response and considers this finding closed for purposes of this program review. Nevertheless, the directors and officials of IIA are put on notice that they must take any additional actions that may be needed to ensure future compliance with all Clery Act requirements. The Department will include additional information about this topic in the next edition of the "Handbook for Campus Safety and Security Reporting."

Appendix A: Student Review Sample

Appendix A: Student Sample contains personally identifiable information and will be emailed to IIA as an encrypted WinZip file using Advanced Encryption Standard, 256-bit. The password needed to open the encrypted WinZip file(s) will be sent in a separate email.

Appendix B: Program Review Report

Appendix B: Program Review Report will be emailed to IIA as an encrypted WinZip file using Advanced Encryption Standard, 256-bit. The password needed to open the encrypted WinZip file(s) will be sent in a separate email.

Appendix C: Institution's Written Response to Program Review Report

Appendix C: Institution's Written Response to the Program Review Report will be emailed to IIA as an encrypted WinZip file using Advanced Encryption Standard, 256-bit. The password needed to open the encrypted WinZip file(s) will be sent in a separate email.

Prepared for:

The Illinois Institute of Art

OPE ID: 01258400

PRCN: 201330528303

Prepared by:

U.S. Department of Education

Federal Student Aid

Chicago/Denver School Participation Division

Program Review Report

September 3, 2014

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A. Institutional Information

The Illinois Institute of Art
350 N. Orleans St., Ste. 136-L
Chicago, IL 60654-1593

Type: Proprietary

Highest Level of Offering: Bachelor's Degrees

Accrediting Agency: North Central Association of Colleges and Schools

Student Enrollment: Approximately 4,183

% of Students Receiving Title IV: Approximately 93%

Title IV Participation: (PEPS)

<u>Program</u>	<u>2012/13 Award Year</u>
William D. Ford Federal Direct Loan Program	\$71,490,818
Federal Pell Grant Program	14,864,446
Federal Supplemental Educational Opportunity Grant Program	1,060,200
Federal Work-Study Program	355,929

Default Rate - Direct Loan: 2011 – 12.6%
2010 – 10.8%
2009 – 10.4%

Default Rate - Perkins: Does not participate

B. Scope of Review

The U.S. Department of Education (Department) conducted a program review at the Illinois Institute of Art (IIA) from May 13, 2013 to May 16, 2013. The review was conducted by Mitch Cary, Rosa Reth and Tonee Buwana.

The focus of the review was to determine IIA's compliance with the statutes and federal regulations as they pertain to the institution's administration of the Title IV programs. The review consisted of, but was not limited to, an examination of IIA's policies and procedures regarding institutional and student eligibility, individual student financial aid and academic files, attendance records, student account ledgers, and fiscal records.

A sample of 30 files was identified for review from the 2011/12 and 2012/13 award years. The files were selected randomly from a statistical sample of the total population receiving Title IV, HEA program funds for each award year. Appendix A lists the names and partial social security numbers of the students whose files were examined during the program review.

Disclaimer:

Although the review was thorough, it cannot be assumed to be all-inclusive. The absence of statements in the report concerning IIA's specific practices and procedures must not be construed as acceptance, approval, or endorsement of those specific practices and procedures. Furthermore, it does not relieve IIA of its obligation to comply with all of the statutory or regulatory provisions governing the Title IV, HEA programs.

This report reflects initial findings. These findings are not final. The Department will issue its final findings in a subsequent Final Program Review Determination letter.

C. Findings

During the review, several areas of noncompliance were noted. Findings of noncompliance are referenced to the applicable statutes and regulations and specify the actions to be taken by IIA to bring operations of the financial aid programs into compliance with the statutes and regulations.

1. Fire Awareness Requirements Not Met – Multiple Violations

Citation: As of October 1, 2010, the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (*Clery Act*) and the Department's regulations require that all institutions receiving Title IV, HEA funds that maintain an on-campus student housing facility must, by October 1 of

each year, prepare, publish and distribute to its current students and employees through appropriate publications and mailings, an Annual Fire Safety Report (AFSR) that contains, at a minimum, all of the statistical and policy elements described in 34 C.F.R. § 668.49(b). These institutions must disclose fire statistics for each on-campus student residential facility for the three most-recent calendar years. An institution's statistics must accurately and completely identify the number of on-campus fires and the cause of each fire, the number of persons who sustained fire-related injuries that resulted in treatment at a medical facility (including on-campus health centers), the number of fire-related deaths, and the dollar value of property damage caused by such fires. 34 C.F.R. § 668.49(c).

In addition, the AFSR must include several fire safety information disclosures covering topics such as the type(s) of fire safety systems that are used in each student housing facility, the number of fire drills that were conducted during the previous calendar year, any institutional policies, procedures, and programs regarding: 1) the use and/or possession of portable electrical appliances; 2) smoking and the use/presence of open flames in student housing facilities; 3) evacuation procedures to be followed in the case of a fire; 4) fire safety education and training programs; 5) the institutional official(s) and departments to whom students and employees should report the occurrence of fires so that those incidents can be included in the institution's annual fire statistics; and, 6) any plans for future improvements to the institution's fire safety program. 34 C.F.R. § 668.49(b).

The AFSR must be published and distributed as a materially-complete, comprehensive publication. If an institution chooses to combine its Annual Security Report and publish them as a single document, then the title of both reports must conspicuously appear on the cover page. Acceptable means of delivery include U.S. Mail, hand delivery, or campus mail distribution to the individual or posting on the institution's website. If an institution chooses to distribute its report by posting to an internet or intranet site, the institution must, by October 1 of each year, distribute a notice to all current students and employees that includes a direct link to each report (exact electronic address), a description of its contents, as well as an advisement that a paper copy will be provided upon request. The Department's regulations also require participating institutions to provide a notice to all prospective students and employees that includes a statement about the AFSR's availability, the content of each report, and the exact electronic address of each report, if posted to an internet or intranet site. This notice must also advise interested parties how to obtain a paper copy of the AFSR.

Finally, an institution is required to submit its campus crime and fire statistics to the Secretary on an annual basis. 34 C.F.R. § 668.41(e)(1)-(6).

Non-Compliance: IIA violated multiple provisions of the *Clery Act* fire safety requirements. The most serious of these violations pertain to the institution's failure to publish an AFSR and actively distribute such a report to enrolled students and current employees. The Department's review indicates that IIA did not publish and distribute an AFSR for the 2011/12 and 2012/13 award years and this failure to comply with the federal guidelines has persisted since the fire safety requirements were added to the *Clery Act* in 2010.

IIA provides on-campus housing for its students. The housing is not owned by the institution, but it is controlled by the institution. Since the housing is in the same reasonably contiguous geographic area and is used in direct support of the institution's educational purposes IIA is required by the *Clery Act* to publish and distribute an AFSR and implement a system of complaint fire safety policies and procedures.

Failure to publish an accurate and complete AFSR and actively distribute it to students and employees deprives them of important fire safety information to which they are entitled. Access to this information permits campus community members, especially those who live in campus housing, to make well-informed decisions about where to work and study and empowers them to play a more active role in their own safety and security.

Required Action: As a result of these violations, IIA must develop and implement internal policies and procedures that will govern the preparation, publication, and distribution of the AFSR and that will ensure that all fire safety operations at IIA will be carried out in accordance with the *Clery Act* going forward. In addition, the new procedures also must articulate how prospective students and employees will be notified of the AFSR's availability. Moreover, the institution must establish and maintain a compliant fire log.

Using its new and revised policies as a guide, IIA must prepare and publish an accurate and complete AFSR that includes all of the statistical disclosures and policy, procedure and programmatic information required by 34 C.F.R. § 668.49(b). A copy of the institution's new and revised policies and procedures and its draft AFSR must accompany IIA's response to this program review report. Once the new AFSR is evaluated by the review team for accuracy and completeness, IIA will be required to actively distribute it to all current students and employees in accordance with 34 C.F.R. §668.41(e).

Finally, IIA will be required to provide documentation to the Department evidencing the distribution as well as a certification statement attesting to the fact that the materials were distributed in accordance with the *Clery Act*. This certification must also affirm that the institution understands its *Clery Act* fire

safety obligations and that it has taken all necessary corrective actions to ensure that these violations do not recur.

As noted above, the exceptions identified in this finding constitute serious violations of the *Clery Act*'s fire safety requirements that by their nature cannot be cured. There is no way to truly "correct" a violation of this type once it occurs. IIA will be given an opportunity to publish and distribute an accurate and complete AFSR and by doing so, will begin the process of bringing its overall fire safety program into compliance with the *Clery Act* as required by its Program Participation Agreement. While enhanced safety is the Department's primary focus, we note that such improvements also may result in a better risk management environment for the institution. Nevertheless, IIA is advised that these remedial measures cannot and do not diminish the seriousness of these violations nor do they eliminate the possibility that the Department will impose an adverse administrative action and/or require other corrective actions as a result.

Based on an evaluation of all available information including IIA's response, the Department will determine if additional actions will be required and will advise the institution accordingly in the FPRD.

2. Incorrect Federal Pell Grant Disbursements/Enrollment Status Not Verified

Citation: The institution is responsible for the proper calculation of eligibility for Federal Pell Grant recipients. If an institution uses credit hours and academic terms to measure a student's progress, then the student's enrollment status (full-time, three-quarter time, half-time or less than half-time) must be used to calculate the amount of the student's Federal Pell Grant payment. 34 C.F.R. § 690.63(b)(1). A school may use its own standard for enrollment status, provided the standard meets the minimum requirements defined by regulations.

If a student's enrollment status changes from one term to the next, the institution must recalculate the Federal Pell Grant using the new enrollment status. 34 C.F.R. § 690.80(b). Specifically, if the student does not begin attendance in all classes for which he/she originally enrolled, the institution must recalculate the Pell award based on the student's new enrollment status.

If a student's projected enrollment status changes during a payment period, after the student has begun attendance in all classes, the institution may recalculate a Pell award, but is not required to. While recalculation may not be required, it is important to note that the institution's recalculation policy must be uniformly applied to all students who change enrollment status after the commencement of classes. 34 C.F.R. § 690.80(b)(2)(i).

Noncompliance: In two instances IIA disbursed Federal Pell Grant Program funds to a student that exceeded the student's eligibility. The improper disbursements were made based on an incorrect enrollment status.

The following deficiencies were noted for *Student #10*:

The student was enrolled for eight credit hours (half-time status) in the Summer 2011 and Winter 2012 terms. IIA disbursed Federal Pell Grant funds to this student in the amount of \$1,850 in each of these terms. Based on the student's enrollment status the student was only eligible for Pell funds in the amount of \$925 in each of these terms. It is noted that the institution caught the errors and eventually refunded the ineligible amounts for each of the terms.

Required Action: Since the ineligible amounts have been refunded IIA will not incur any liabilities for this finding. However, in response to this finding, IIA must develop and implement procedures to ensure that Federal Pell Grant awards are calculated properly in the future. Copies of such procedures must be submitted with the institution's response to this report.

3. **Change in Administrators Not Reported to the Department**

Citation: If changes are made in the administration that is responsible for operating the school and/or changes regarding the individual that is responsible for administering the Title IV Programs, these changes must be reported to the Department in a timely manner. An eligible institution must report certain changes in its administration to the Department in a manner (Electronic Application) that is prescribed by the Department, within 10 days after the change occurs. 34 C.F.R. § 600.21(a). These changes include, but are not limited to the following: a change in a person's ability to substantially affect the actions of the institution. This may include the chief executive officer or chief financial officer of the institution. 34 C.F.R. § 600.21(a)(6)(iii). Additionally, an institution must also report the name of the individual who has been designated as its Title IV program administrator. 34 C.F.R. § 600.21(a)(7).

Noncompliance: IIA failed to report several changes in its administrators to the Department. Specifically, when the Department contacted IIA on April 18, 2013 to inform the institution of an upcoming Title IV program review, the Department's database indicated that the president of the institution was John Jenkins, the financial aid administrator was Paula Price, and the chief financial officer was Robert Smetak. The Department shortly learned that none of these three individuals were still holding the positions that were listed in the Department's database. The information in the Department's database was inaccurate because IIA failed to notify the

Department of any of the changes. Upon being informed of these discrepancies by the Department at the time of the program review IIA made the appropriate updates to all three positions via the Department's electronic application.

Required Action: The Department has confirmed that the appropriate personnel changes have now been properly reported by IIA. However, in response to this finding, IIA must develop and implement procedures to ensure that appropriate application updates, in accordance with 34 C.F.R. § 600.21, are made when required. Copies of such procedures must be submitted with the institution's response to this report.