

**From:** Kami Averett  
**Sent:** 19 Jun 2017 16:57:08 +0000  
**To:** AltEarningsAppeals  
**Cc:** Dale LeMonds;Karling Cosca;Brittany Sharp;rkoirala@dalcpapc.net  
**Subject:** Revised- Aveda Institute Provo-OPE ID 040723-00: Alternate Earnings Appeal: Examination level Attestation  
**Attachments:** Revised-Aveda Institute Provo OPE ID 040723-00-Examination Level Attestation-RGEES.pdf

OPEID: 040723  
Aveda Institute Provo

Attached is the revised attestation updated to clearly reflect our opinion on compliance with the RGEES survey standards. Our report is being revised per the request of Gainful Employment Operations Team.

Thank you,

**Kami Averett**  
Financial Aid Lead  
Aveda Institute Provo  
801.375.1501 ext. 2022



"Try not to become a person of success, but rather try to become a person of value." -  
ALBERT EINSTEIN

**UTAH INSTITUTE, LLC  
D/B/A  
AVEDA INSTITUTE PROVO  
(A WHOLLY OWNED ENTITY OF  
ARIZONA INSTITUTE LLC)**

**ENTITY No. 26-2620214  
210 NORTH UNIVERSITY AVENUE  
PROVO, UTAH 84601-1008**

**ENTITY No. 27-1462704  
OPE ID No. 040723-00  
DUNS No. 833-24-2683**

**EXAMINATION LEVEL ATTESTATION  
RECENT GRADUATE EMPLOYMENT  
AND EARNINGS SURVEY (RGEES)  
FOR THE YEAR ENDED DECEMBER 31, 2014**

**ALTERNATE EARNINGS APPEAL  
SUBMISSION UNDER  
34 CFR 668.406**

**DEBT MEASURE YEAR 2015  
GAINFUL EMPLOYMENT (GE)  
FINAL DEBT-TO-EARNINGS (D/E) RATES  
PUBLISHED IN JANUARY 2017**



**David A Levy CPA PC**  
*Certified Public Accountants*  
20 Freeman Place  
Needham, MA 02492  
Tel. (617) 566-3645 (866) 842-0108  
Fax. (866) 681-2377  
[www.DALCPAPC.net](http://www.DALCPAPC.net)

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## **INDEPENDENT ACCOUNTANTS' REPORT**

Arizona Institute, LLC  
Utah Institute, LLC  
d/b/a Aveda Institute Provo  
210 North University Avenue  
Provo, Utah 84601-1008

### **REPORT ON COMPLIANCE**

We have examined the written assertions of the management of Aveda Institute Provo, OPE #040723-00, stating that the alternate earnings information obtained utilizing the Recent Graduate Employment and Earnings Survey (RGEES) of the Gainful Employment Regulations is in accordance with the Standards Requirements of Section 668.406 of Title 34 of the Code of Federal Regulations (34 CFR 668.406) and the requirements set forth in the NCES Earnings Survey Form, for the cohort period December 31, 2014, used to calculate the final Debt to Earnings Rates issued in January, 2017.

### **MANAGEMENT'S RESPONSIBILITY**

The management of Aveda Institute Provo is responsible for the school's compliance with those requirements.

### **ACCOUNTANTS' RESPONSIBILITY**

Our responsibility is to express an opinion on management's written assertions about the institution's compliance that the survey was conducted in accordance with the requirements set forth in the National Center for Education Statistics (NCES) earnings survey form.

Our examination was made in accordance with standards established by the American Institute of Certified Public Accountants (AICPA), attestation standards contained in *Government Accountability Office's Government Auditing Standards*, promulgated by the Comptroller General of the United States, requirements set forth in the Standards for Conducting the RGEES and with procedures for attestations contained in guides developed by the Department of Education's Office of Inspector General accordingly

We examined, on a test basis, evidence about Aveda Institute Provo's compliance with 34 CFR 668.406, and performed other procedures that we considered necessary under the circumstances. We believe our examination provides a reasonable basis for our opinion. Our examination does not provide a legal determination on Aveda Institute Provo's compliance with specified requirements.

#### **OPINION ON COMPLIANCE**

In our opinion, Aveda Institute Provo complied, in all material respects, with the compliance requirements referred to above for the Recent Graduate Employment and Earnings Survey (RGEES), for the cohort period ending on December 31, 2014.

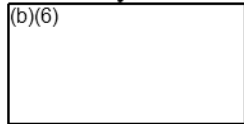
#### **PURPOSE OF THE REPORT**

This report is intended solely for the information of the Institution's management and the U.S. Department of Education.

Thank you for your consideration.

Sincerely,

(b)(6)

A rectangular box with a black border, used to redact the signature of David A. Levy. The text "(b)(6)" is written in the top-left corner of the box.

*CPA PC*

David A Levy CPA PC  
Needham, Massachusetts  
March 7, 2017

**From:** Mary Hoderlein  
**Sent:** 18 Jan 2017 18:23:25 -0500  
**To:** AltEarningsAppeals  
**Subject:** RGEES platform issues regarding individual earnings report  
**Importance:** High

Hello,

We are using the RGEES platform for graduates to complete surveys for our Alternate Earnings Appeal. However, there is a discrepancy between the number of those marked as complete under the disposition report and number of completes showing up under the individual earnings report.

The disposition report shows our correct number of completes. The Individual earnings report shows a reduced number of completes. Since we cannot see the responses provided by the graduates, we are losing completes. We like using this method for collecting data but cannot afford to lose the completes.

Do you have a resolution to this issue? We are trying to call graduates to ask them to take the survey over the phone in case we can't recover the data for the missing completes but we have not been successful at this time.

Thank you for your time!  
Mary

**Mary Hoderlein**

Student Accounts

NurturAveda

*Aveda Institute Columbus, Aveda Institute Chapel Hill, Aveda Institute Los Angeles*

6279 Tri-Ridge Blvd., Suite 250

Loveland, OH 45140

[MHoderlein@nurturaveda.com](mailto:MHoderlein@nurturaveda.com)

Direct: (614) 291-2421, Ext. 1127

Office: (513) 576-9333

Fax: (513) 576-0374

**From:** Paul  
**Sent:** 18 Jan 2017 21:18:41 +0000  
**To:** AltEarningsAppeals  
**Cc:** Paul  
**Subject:** RGEES software asking for 2015 year instead of 2014

Hi,

We are a third-party servicer for many schools. We have a school that is currently working on submitting an Alternate Earning Survey.

The institution intends to submit an Alternate Earnings Survey. The institution has properly downloaded and installed the Recent Graduates Employment Earning Survey (RGEES) platform software. The institution has one program it intends to appeal. In order to populate the RGEES platform software for this single program the institution ordered through NSLDS the GE Alternate Earning Survey Extract (GEAEE1) and then imported it into the RGEES software as instructed in the Technical Guide for the Recent Graduates Employment and Earning Survey. The institution has made no changes or edits to any of the imported information.

The award year that was defaulted to after the import of the extract is 2015-2016 for this single program. It appears that this then causes the survey being emailed to students to ask for financial information from the 2015 year. We believe the data, including the year the survey asks respondents about, is being auto-populated in the survey (which is not editable by the institution) and is driven by, in part, the award year selected, but repeated contacts to the GE Operations Team have not yielded an answer. Based on information in the recent electronic announcements from the Department the information should be collected from the 2014 year (the institution is NOT using state data). The institution is hesitant to make this change without confirming because they used the extract exactly as it came from NSLDS. Since the institution is utilizing the RGEES platform software to appeal the earning information for the recently released Gainful Employment rate should they select the award year 2014-2015? If not, what award year should they select?

If you wish to locate the dropdown menu within the RGEES platform software in question:

- 1- Login
- 2- Click on "Manage Programs"
- 3- Click on "View, Edit and Delete Programs"
- 4- Click on "Expand All"
  - a. You will see the dropdown menu entitled "Award Year" just below the CIP Name.

Since the institution has a limited time to complete the survey, your attention is greatly appreciated.

Thanks.

**Paul Pari**

Vice President of Compliance & Training  
Educational Compliance Management, Inc.  
190 Margaretta Avenue | Massapequa, NY 11758

[paulp@ecmfinaid.com](mailto:paulp@ecmfinaid.com)

(516) 679-1616 (O)

(516) 679-1662 (F)

[www.ecmfinaid.com](http://www.ecmfinaid.com)



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**From:** Maria L. Gomez  
**Sent:** 23 Jan 2017 20:57:11 +0000  
**To:** AltEarningsAppeals  
**Subject:** RGEES SOFTWARE

Good afternoon,

I received the RGEES technical guide installation guide and forwarded it to our IT department as per the instructions. We are now in the process of sending out the surveys to our former graduates. If I understood correctly, once we receive our surveys I can utilize this platform to produce reports, manage data collections. etc. Can the surveys be transmitted using this software?

I await your response.

Thank you in advance,

*Maria L Gomez*

Loan Default Management



19151 S Dixie Highway #205

Cutler Bay , FL 33157

Ph: 786-693-8827

Fax: (305) 238-2302

maria.gomez@cbt.edu

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**From:** Kelly Sanders  
**Sent:** 23 Jan 2017 22:20:27 +0000  
**To:** AltEarningsAppeals  
**Subject:** RGEES standard and survey form access

*Greetings!*

*I have checked out the National Center for Education Statistics in search of the survey forms that were in development. I am not finding it on their website. I did find the standards and best practice guides, but I thought there was an actual survey that we could utilize in collecting data. Is that available, and if so where is it located?*

*Thank you,  
Kelly Sanders  
Director of Financial Aid  
Professional Skills Institute  
(419) 720-6670 Ext. 8002  
ksanders@proskills.edu*

**From:** Bernal, Omar  
**Sent:** 31 Jan 2017 23:09:00 +0000  
**To:** AltEarningsAppeals  
**Subject:** Rgees system email address

Hello,

My name is Omar Bernal, from Northwestern College In the Chicagoland Area, and I have a question about the sender email address in the Rgees system ([Admin@rgees.org](mailto:Admin@rgees.org)), can this be change to the email address of our institution's Survey administrator?

Any guidance will be greatly appreciated.

Thanks,

-Omar

Omar Bernal  
Senior Director of Central Technology Operations - ITS  
**Northwestern College**  
Central Administration Offices  
9501 Technology Blvd. Suite 425  
Rosemont, IL 60018  
t. 847-233-7700 Ext. 2128  
f. 847-233-7705

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**From:** Martha Snodgrass  
**Sent:** 9 Jan 2017 22:17:48 +0000  
**To:** AltEarningsAppeals  
**Cc:** Gainful Employment;GE.Operations;GECertification  
**Subject:** RGEES

Hello,

We need to verify: For the Appeals process and rates, are we using 2014 tax information for the 2014/2015 Award Year or 2015 tax information for the 2015/2016 Award Year?

Please verify what years the appeals and data are reported for. The letter from DOE says DMYR 2015 and we need to know if this is for 14/15 or 15/16.

Thanks!

Martha Snodgrass  
Director of Financial Aid



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**From:** Kristie Davis  
**Sent:** 30 Jan 2017 16:08:14 -0800  
**To:** AltEarningsAppeals  
**Subject:** State Sponsored Appeal

Hello,

Could you please clarify how an institution “demonstrates” required elements for a state-sponsored appeal?

*“When submitting documentation of alternate earnings data from a state-sponsored data system, the institution must demonstrate that the data were obtained for at least 50 percent of the completers in the cohort period and that it included at least 30 completers. The submission must be accompanied by the President’s/CEO’s signed certification that the state-provided earnings data were accurately used to recalculate D/E results.”*

**From:** Kristie Davis  
**Sent:** 30 Jan 2017 16:14:06 -0800  
**To:** AltEarningsAppeals  
**Subject:** State Sponsored Appeal

Hello,

Could you please clarify how a school “demonstrates” compliance with the below appeals documentation for a state sponsored appeal? Do we simply include the new earnings that was obtained from the state and subsequent recalculated GE rate information on the President’s signed certification?

*When submitting documentation of alternate earnings data from a state-sponsored data system, the institution must demonstrate that the data were obtained for at least 50 percent of the completers in the cohort period and that it included at least 30 completers. The submission must be accompanied by the President’s/CEO’s signed certification that the state-provided earnings data were accurately used to recalculate D/E results.*

Finally, do we type up our own certification on our own letterhead for the President’s certification?

Thank you for your assistance,  
Kristie Davis

**From:** Danielle Yeager  
**Sent:** 10 Jan 2017 12:36:45 -0500  
**To:** AltEarningsAppeals  
**Subject:** State-Sponsored System Appeal

Good Afternoon,

As we have received our final GE/DE ratios and need to move forward with an Alternate Earnings Appeal I would like to know which state-sponsored data system we would be able to use to appeal our programs that are in the zone. I have contacted the GE helpline and was directed that there is no further information on this question as of this period of time and to contact this email for resolution. As our final appeals will have to be submitted by March 10, 2017 it is imperative that this information be provided as soon as possible.

**Danielle Yeager**

Director of Career Services

(T) 856-232-0310

(F) 856-232-1165



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This email has been checked for viruses by Avast antivirus software.  
[www.avast.com](http://www.avast.com)

**From:** Dr. Sarah Beth Schillage  
**Sent:** 9 Jan 2017 15:45:46 -0600  
**To:** AltEarningsAppeals  
**Subject:** Student Question regarding process

Please give guidance on how to answer the following question from our students:

If an institution submits survey information from a student as part of the Alternate Earnings Appeal process showing a higher earned income than reported through SSA, will the information be reported to the IRS?

Thank you

Sarah Beth Schillage, Ed.D.  
Compliance Officer  
Compass Career College  
985-419-2050

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**From:** John W. Rebstock  
**Sent:** 19 Jan 2017 16:19:52 +0000  
**To:** AltEarningsAppeals  
**Cc:** Executives-Email;Nelly Alvarez  
**Subject:** Subject: "Notice of Intent to File Alternate Earnings Appeal" - BEAUTY SCHOOLS OF AMERICA

**RE: BEAUTY SCHOOLS OF AMERICA**

**OPEID: 022838**

PROGRAMS THAT WILL BE PART OF THE APPEAL:

	CIP CODE	CREDENTIAL LEVEL
COSMETOLOGY	12.0401	01
BARBER	12.0402	01

**John W. Rebstock**  
**President**

**From:** Dan  
**Sent:** 19 Jan 2017 17:31:32 +0000  
**To:** AltEarningsAppeals  
**Subject:** Submission of Early Notice of Intent to File Alternate Earnings Appeal

To who it may concern.

This E-mail is on behalf of Larry Nienhueser, CEO of Old Town Barber College (Kansas School of Barbering) OPEID: 021348. We were notified again about the deadline for submission for Intent to File Alternate Earnings Appeal. Please note the submission on 1/9/17. Thanks for reviewing for confirmation.

----- Original message -----

From: Dan <Dan@otbcollege.com>  
Date: 1/9/17 2:15 PM (GMT-06:00)  
To: AltEarningsAppeals@ed.gov  
Cc: Larry Nienhueser <larry@otbcollege.com>, financial aid <financialaid@otbcollege.com>  
Subject: Notice of Intent to File Alternate Earnings Appeal

Dear FSA:

In accordance with the instructions set out in *Gainful Employment Electronic Announcement #95 - Debt-to-Earnings Rate Alternate Earnings Appeals*, Old Town Barber College (**OPEID: 021348**) hereby notifies the Department of its intent to file an Alternate Earnings Appeal for the following program:

CIP Code	Credential Level	Program Name
12.0402	01	Barbering/Barber

**We respectfully request that the Department confirm that this email has been received and that this Notice of Appeal has been accepted.**

If you have any questions, please do not hesitate to contact me at this email address, or by telephone at 316.264.4891.

Sincerely,

Paulette Foster    Financial Assistance

Larry Nienhueser    CEO

Sent from Mail for Windows 10

**From:** postmaster@douglasj.com  
**Sent:** 3 May 2017 15:01:25 +0000  
**To:** Kristi Bernhardt  
**Subject:** Undeliverable: RE: Alternative Earnings Appeal  
**Attachments:** RE: Alternative Earnings Appeal



Your message to kristi.bernhardt@douglasj.com couldn't be delivered.

kristi.bernhardt wasn't found at douglasj.com.

AltEarningsAppeals	Office 365	kristi.bernhardt
Action Required		Recipient

Unknown To address

## How to Fix It

The address may be misspelled or may not exist. Try one or more of the following:

- Send the message again following these steps: In Outlook, open this non-delivery report (NDR) and choose **Send Again** from the Report ribbon. In Outlook on the web, select this NDR, then select the link "**To send this message again, click here.**" Then delete and retype the entire recipient address. If prompted with an Auto-Complete List suggestion don't select it. After typing the complete address, click **Send**.
- Contact the recipient (by phone, for example) to check that the address exists and is correct.
- The recipient may have set up email forwarding to an incorrect address. Ask them to check that any forwarding they've set up is working correctly.
- Clear the recipient Auto-Complete List in Outlook or Outlook on the web by following the steps in this article: [Fix email delivery issues for error code 5.1.10 in Office 365](#), and then send the message again. Retype the entire recipient address before selecting **Send**.

If the problem continues, forward this message to your email admin. If you're an email admin, refer to the **More Info for Email Admins** section below.

Was this helpful? [Send feedback to Microsoft.](#)

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## More Info for Email Admins

Status code: 550 5.1.10

This error occurs because the sender sent a message to an email address hosted by Office 365 but the address is incorrect or doesn't exist at the destination domain. The error is reported by the recipient domain's email server, but most often it must be fixed by the person who sent the message. If the steps in the **How to Fix It** section above don't fix the problem, and you're the email admin for the recipient, try one or more of the following:

**The email address exists and is correct** - Confirm that the recipient address exists, is correct, and is accepting messages.

**Synchronize your directories** - If you have a hybrid environment and are using directory synchronization make sure the recipient's email address is synced correctly in both Office 365 and in your on-premises directory.

**Errant forwarding rule** - Check for forwarding rules that aren't behaving as expected. Forwarding can be set up by an admin via mail flow rules or mailbox forwarding address settings, or by the recipient via the Inbox Rules feature.

**Recipient has a valid license** - Make sure the recipient has an Office 365 license assigned to them. The recipient's email admin can use the Office 365 admin center to assign a license (Users > Active Users > select the recipient > Assigned License > Edit).

**Mail flow settings and MX records are not correct** - Misconfigured mail flow or MX record settings can cause this error. Check your Office 365 mail flow settings to make sure your domain and any mail flow connectors are set up correctly. Also, work with your domain registrar to make sure the MX records for your domain are configured correctly.

For more information and additional tips to fix this issue, see [Fix email delivery issues for error code 5.1.10 in Office 365](#).

### Original Message Details

Created Date: 5/3/2017 3:01:21 PM  
Sender Address: AltEarningsAppeals@ed.gov  
Recipient Address: kristi.bernhardt@douglasj.com  
Subject: RE: Alternative Earnings Appeal

### Error Details

Reported error: 550 5.1.10 RESOLVER.ADR.RecipientNotFound; Recipient not found

by SMTP address lookup

DSN generated by: MWHPR06MB2496.namprd06.prod.outlook.com

## Message Hops

HOP	TIME (UTC)	FROM	TO	WITH	RELAY TIME
1	5/3 /20 17 3:01:21 PM	SN1PR09MB1151.namprd09.prod.outlook.com	SN1PR09MB1151.namprd09.prod.outlook.com	mapi	*
2	5/3 /20 17 3:01:22 PM	SN1PR09MB1151.namprd09.prod.outlook.com	SN1PR09MB1024.namprd09.prod.outlook.com	Microsoft SMTP Server (version=TLS1_2, cipher=TLS_ECDHE_RSA_WITH_AES_128_CBC_SHA256_P256)	1 sec
3	5/3 /20 17 3:01:23 PM	gcc01-dm2-obe.outbound.protection.outlook.com	BL2NAM02FT030.mail.protection.outlook.com	Microsoft SMTP Server (version=TLS1_2, cipher=TLS_ECDHE_RSA_WITH_AES_256_CBC_SHA384_P384)	1 sec
4	5/3 /20 17 3:01:24 PM	BL2NAM02FT030.eop-nam02.prod.protection.outlook.com	BY2PR0601CA0005.outlook.office365.com	Microsoft SMTP Server (version=TLS1_2, cipher=TLS_ECDHE_RSA_WITH_AES_128_CBC_SHA256_P256)	1 sec
5	5/3 /20 17 3:01:24	BY2PR0601CA0005.namprd06.prod.outlook.com	MWHPR06MB2496.namprd06.prod.outlook.com	Microsoft SMTP Server (version=TLS1_2, cipher=TLS_ECDHE_RSA_WITH_AES_128_CBC_SHA256_P256)	*

PM

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## Original Message Headers

Received: from BY2PR0601CA0005.namprd06.prod.outlook.com (10.163.62.15) by MWHPR06MB2496.namprd06.prod.outlook.com (10.168.248.20) with Microsoft SMTP

Server (version=TLS1\_2, cipher=TLS\_ECDHE\_RSA\_WITH\_AES\_128\_CBC\_SHA256\_P256) id 15.1.1075.11; Wed, 3 May 2017 15:01:24 +0000

Received: from BL2NAM02FT030.eop-nam02.prod.protection.outlook.com (2a01:111:f400:7e46::203) by BY2PR0601CA0005.outlook.office365.com (2a01:111:e400:58a3::15) with Microsoft SMTP Server (version=TLS1\_2, cipher=TLS\_ECDHE\_RSA\_WITH\_AES\_128\_CBC\_SHA256\_P256) id 15.1.1075.11 via Frontend Transport; Wed, 3 May 2017 15:01:24 +0000

Authentication-Results: spf=pass (sender IP is 23.103.201.47) smtp.mailfrom=ed.gov; douglasj.com; dkim=pass (signature was verified) header.d=ed.gov;douglasj.com; dmarc=pass action=none header.from=ed.gov;

Received-SPF: Pass (protection.outlook.com: domain of ed.gov designates 23.103.201.47 as permitted sender) receiver=protection.outlook.com; client-ip=23.103.201.47; helo=gcc01-dm2-obe.outbound.protection.outlook.com;

Received: from gcc01-dm2-obe.outbound.protection.outlook.com (23.103.201.47)

by BL2NAM02FT030.mail.protection.outlook.com (10.152.77.172) with Microsoft

SMTP Server (version=TLS1\_2, cipher=TLS\_ECDHE\_RSA\_WITH\_AES\_256\_CBC\_SHA384\_P384) id 15.1.1019.14 via Frontend Transport; Wed, 3 May 2017 15:01:23 +0000

DKIM-Signature: v=1; a=rsa-sha256; c=relaxed/relaxed; d=ed.gov; s=selector1;

h=From:Date:Subject:Message-ID:Content-Type:MIME-Version; bh=2Kut7wZARuyzNLN9rI0T0BAEjw2WGaemwST7Wsz9FMU=;

b=UWyKUCvaq+X85KyIaLqEyHQ3T/OKSvXpUO0AbzYcdkXGqyftHMFKEAkB7H/axpejNtAynK46QyK+IRbjcA7koMUNtl/KLSh+3Xix87svPzy5abqc9omn5icXGqLu8WniXnA2n1SHbT4jU0n2tSAT59Xv4RRfbPcuQYplaAmuDs=

Received: from SN1PR09MB1151.namprd09.prod.outlook.com (10.166.68.156) by

SN1PR09MB1024.namprd09.prod.outlook.com (10.166.69.18) with Microsoft SMTP

Server (version=TLS1\_2, cipher=TLS\_ECDHE\_RSA\_WITH\_AES\_128\_CBC\_SHA256\_P256) id 15.1.1061.12; Wed, 3 May 2017 15:01:22 +0000

Received: from SN1PR09MB1151.namprd09.prod.outlook.com ([10.166.68.156]) by

SN1PR09MB1151.namprd09.prod.outlook.com ([10.166.68.156]) with mapi id 15.01.1061.021; Wed, 3 May 2017 15:01:21 +0000

From: AltEarningsAppeals <AltEarningsAppeals@ed.gov>

To: Kristi Bernhardt <kristi.bernhardt@douglasj.com>, AltEarningsAppeals

<AltEarningsAppeals@ed.gov>

Subject: RE: Alternative Earnings Appeal

Thread-Topic: Alternative Earnings Appeal  
Thread-Index: AdKRWvnIw7O3kx7WTLal1khSHVt6HwyweRlg  
Date: Wed, 3 May 2017 15:01:21 +0000  
Message-ID:  
<SN1PR09MB1151CAB25AD07580CCFEB4CCF5160@SN1PR09MB1151.namprd09.prod.outlook.com>  
References:  
<MWHPR06MB2317DC3FB00FF56AD4FB681DF8560@MWHPR06MB2317.namprd06.prod.outlook.com>  
In-Reply-To:  
<MWHPR06MB2317DC3FB00FF56AD4FB681DF8560@MWHPR06MB2317.namprd06.prod.outlook.com>  
Accept-Language: en-US  
Content-Language: en-US  
X-MS-Has-Attach: yes  
X-MS-TNEF-Correlator:  
authentication-results: douglasj.com; dkim=none (message not signed) header.d=none;douglasj.com; dmarc=none action=none header.from=ed.gov;  
x-ms-exchange-messagesentrepresentingtype: 1  
x-originating-ip: [165.224.214.5]  
x-ms-publictraffictype: Email  
X-Microsoft-Exchange-Diagnostics-untrusted:  
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**From:** AltEarningsAppeals  
**Sent:** 3 May 2017 15:01:21 +0000  
**To:** Kristi Bernhardt;AltEarningsAppeals  
**Subject:** RE: Alternative Earnings Appeal

Good Morning Ms. Bernhardt,

This message confirms that your Gainful Employment alternate earnings appeal package email was received on February 27<sup>th</sup>, 2017. The contents have not yet been reviewed for completeness or content, but your message and at least one attachment were successfully transmitted.

Thank You,

Alternate Earnings Appeals  
Gainful Employment Operations  
Operations Performance Management Services  
Business Operations



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**From:** Kristi Bernhardt [mailto:kristi.bernhardt@douglasj.com]  
**Sent:** Monday, February 27, 2017 7:40 PM  
**To:** AltEarningsAppeals  
**Subject:** Alternative Earnings Appeal

Please contact me with any questions.

Thank you!

**Kristi E. Bernhardt, CPA, CGMA**  
**VP of Resource Team &**  
**Chief Financial Officer**  
Douglas J Companies | douglasj.com  
331 E. Grand River Ave. | East Lansing, MI 48823  
Office: 517-381-6478 | Fax: 517-351-1736

**From:** Judy Owens  
**Sent:** 23 Jan 2017 18:22:50 +0000  
**To:** AltEarningsAppeals  
**Subject:**

The Academy below as of 1/23/2017 is giving notice of intent to file alternate earnings appeal.

American Academy of Cosmetology  
1330 Blanding Boulevard, Suite 125  
Orange Park, Fl. 32065-8026  
OPE ID: 041515-00  
Cosmetology  
CIP Code 12.0401  
Diploma

Rick Wallace  
President/CEO  
FAMOS, LLC DBA American Academy of Cosmetology &  
TeamWallace, LLC  
PO Box 10437  
Tallahassee, Florida 32302  
850-879-2649 Cell  
School Address:  
1330 Blanding Blvd Ste 125, Orange Park , Florida 32065  
14610 Military Trail, Ste G4 , Delary Beach Florida 33484  
904-213-1444 OP Phone  
904-213-0520 OP FAX  
[www.aacschool.com](http://www.aacschool.com)  
[www.teamwallace.org](http://www.teamwallace.org)  
FB Page: Teamwallace  
[www.mytablemesa.com/famos](http://www.mytablemesa.com/famos) (Florida CE for Cosmo/Barber)

**From:** Kalli Blackwell  
**Sent:** 22 May 2017 15:34:29 +0000  
**To:** AltEarningsAppeals  
**Cc:** Kalli Blackwell  
**Subject:** UPDATED: Alternate Earnings Appeal Package\_021178 Aveda Institute Lafayette  
**Attachments:** 021178 President Certification Letter.pdf, Aveda Institute Lafayette-OPE ID 021178 Examination Level Attestation.pdf, Attachment A-Aveda Institute Lafayette-RGEES Results and Calculation2.pdf

Please accept this revised submission. We found one error in the # of survey participants and respondents and that has been corrected in the attached.

Thank you.

**Kalli Blackwell Peterman** | VP Operations | **AI South**  
303 South Pine Street, Hammond, Louisiana 70403  
T: 985 520 4776 | C: 985 966 6102 | [KalliB@AIsouth.com](mailto:KalliB@AIsouth.com) | <http://AIsouth.com>



 Please consider the environment before printing this e-mail

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**From:** Kalli Blackwell  
**Sent:** Monday, March 13, 2017 4:51 PM  
**To:** [AltEarningsAppeals@ed.gov](mailto:AltEarningsAppeals@ed.gov)  
**Subject:** Alternate Earnings Appeal Package\_021178 Aveda Institute Lafayette

Please accept the attached documents as part of Aveda Institute Lafayette's Appeal Package:

- Recalculated D/E Rates
- CEO/President Certification
- Independent Accountant's Attestation

Please let me know if any supporting documentation is required upon review.

Respectfully Submitted,

**Kalli Blackwell Peterman** | VP Operations | **AI South**  
303 South Pine Street, Hammond, Louisiana 70403  
T: 985 520 4776 | C: 985 966 6102 | [KalliB@AIsouth.com](mailto:KalliB@AIsouth.com) | <http://AIsouth.com>



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235 Third Street S, Suite 200 | St. Petersburg, FL 33701  
727.820.3199 | [AvedaInstitutesSouth.edu](http://AvedaInstitutesSouth.edu)

The Secretary  
US Department of Education  
400 Maryland Avenue, SW  
Washington, D.C. 20202

Re: Certification attesting that the Survey was conducted in accordance with the Survey Standards in the Earnings Survey Form

Dear Mr. Secretary:

In connection with our alternate earnings appeal allowed under 34 CFR 668.406 of the final debt-to-earnings (D/E) rates published by the U.S. Department of Education (the department), we certify that the survey was conducted in accordance with the Standards for Conducting the Recent Graduates Employment and Earnings Survey (RGEES) and that the mean or median earnings used to recalculate the debt-to-earnings ratios was accurately determined from the survey results.

(b)(6)

James Petrillo as President  
Beauty Basics, Inc.  
OPE ID 021178  
727.820.3173

3.6.17

Date

**BEAUTY BASICS, INC  
D/B/A  
AVEDA INSTITUTE LAFAYETTE  
2922 JOHNSON STREET  
LAFAYETTE, LA 70503**

**ENTITY NO. 72-134-0047  
OPE ID No. 021178-00  
DUNS No. 829-00-1460**

**EXAMINATION LEVEL ATTESTATION  
RECENT GRADUATE EMPLOYMENT  
AND EARNINGS SURVEY (RGEES)  
FOR THE YEAR ENDED DECEMBER 31, 2014**

**ALTERNATE EARNINGS APPEAL  
SUBMISSION UNDER  
34 CFR 668.406**

**DEBT MEASURE YEAR 2015  
GAINFUL EMPLOYMENT (GE)  
FINAL DEBT-TO-EARNINGS (D/E) RATES  
PUBLISHED IN JANUARY 2017**



**David A Levy CPA PC**  
*Certified Public Accountants*  
20 Freeman Place  
Needham, MA 02492  
Tel. (617) 566-3645 (866) 842-0108  
Fax. (866) 681-2377  
[www.DALCPAPC.net](http://www.DALCPAPC.net)

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## **INDEPENDENT ACCOUNTANTS' REPORT**

Board of Directors  
Aveda Institute Lafayette  
2922 Johnson Street  
Lafayette, LA 70503

### **REPORT ON COMPLIANCE**

We have examined the written assertions of the management of Aveda Institute Lafayette, OPE #021178, stating that the alternate earnings information obtained utilizing the Recent Graduate Employment and Earnings Survey (RGEES) of the Gainful Employment Regulations is in accordance with the Standards Requirements of Section 668.406 of Title 34 of the Code of Federal Regulations (34 CFR 668.406) for the cohort period December 31, 2014, used to calculate the final Debt to Earnings Rates issued in January, 2017.

### **MANAGEMENT'S RESPONSIBILITY**

The management of Aveda Institute Lafayette is responsible for the school's compliance with those requirements.

### **ACCOUNTANTS' RESPONSIBILITY**

Our responsibility is to express an opinion on management's written assertions about the institution's compliance that the survey was conducted in accordance with the requirements set forth in the National Center for Education Statistics (NCES) earnings survey form.

Our examination was made in accordance with standards established by the American Institute of Certified Public Accountants (AICPA), attestation standards contained in *Government Accountability Office's Government Auditing Standards*, promulgated by the Comptroller General of the United States, requirements set forth in the Standards for Conducting the RGEES and with procedures for attestations contained in guides developed by the Department of Education's Office of Inspector General accordingly

We examined, on a test basis, evidence about Aveda Institute Lafayette's compliance with 34 CFR 668.406, and performed other procedures that we considered necessary under the circumstances. We believe our examination provides a reasonable basis for our opinion. Our examination does not provide a legal determination on Aveda Institute Lafayette's compliance with specified requirements.

**OPINION ON COMPLIANCE**

In our opinion, management's written assertions that Aveda Institute Lafayette's RGEES, for the cohort period ending on December 31, 2014 was conducted in accordance with the requirements set forth in the NCES earnings survey form and in accordance with the Standards for Conducting the RGEES. Our examination-level attestation is in accordance with the attestation standards contained in the Government Accountability Office's Government Auditing Standards promulgated by the Comptroller General of the United States, and with the procedures for attestations contained in guides developed by the Department of Education's Office of Inspector General.

**PURPOSE OF REPORT**

This report is intended solely for the information of the Institution's management and the U.S. Department of Education.

(b)(6)



*CPA PC*

David A Levy CPA PC  
Needham, Massachusetts  
March 7, 2017

**Aveda Institute Lafayette**  
**RGEES RESULTS**

<b>1</b>	<b><u>Recalculated D/E Rates</u></b>	As published January 2017	Revised per Alternate Earnings Recalculated D/E
	A Annual Loan Payment	\$ 1,356	\$ 1,356
	B Mean Annual Earnings	12,504	18,816
	C Median Annual Earnings	11,495	17,140
	D <b>Higher of Mean or Median</b>	<b>\$ 12,504</b>	<b>\$ 18,816</b>
	E 150% of HHS Amount-1 Person used (Year 2015)	17,655	17,655
	F <b>Earnings for Discretionary</b>	-	1,161
	G <b>Annual Earning Rate (See below)</b>	<b>10.84%</b>	<b>7.21%</b>
	H Discretionary Income Rate (See below)	100%	100%
	I Result	Zone	Pass
		<b>D=Higher of B or C</b>	
		<b>G=A/D</b>	
		<b>H=A/F</b>	
<b>2</b>	<b><u>Response rate</u></b>		80.56%
	Number of survey respondents	58	
	Number of graduates in the cohort	72	
<b>3</b>	<b><u>Mean and Median</u></b>		\$ 18,816
	Mean	\$ 18,816	
	Median	\$ 17,140	
<b>4</b>	<b><u>Non Response Bias</u></b>	N/A	
	Graduates with Pell Grants		
	Graduates with a zero expected family contribution		
	Females		



This template calculates the response rate for graduates in your survey.

Simply enter the number of graduates who completed the survey in cell B6 and the total number of graduates in the cohort in cell C6.

The survey response rate will be automatically calculated in cell D6.

<b>Number of survey respondents</b>	<b>Number of graduates in the cohort</b>	<b>Response rate</b>
34	40	85.00%

This template calculates the mean and median income for graduates in your program.  
 Simply copy the name and total income for each survey respondent starting in row 8.  
 Mean and median income will be automatically calculated in cells C5 and C6, respectively.

<b>MEAN</b>	<b>\$18,816</b>
<b>MEDIAN</b>	<b>\$17,140</b>
<b>Name (or unique ID):</b>	<b>Total Earnings:</b>
(b)(6)	\$0
	\$0
	\$0
	\$0
	\$0
	\$0
	\$200
	\$1,500
	\$3,000
	\$3,137
	\$5,000
	\$8,000
	\$8,000
	\$8,000
	\$9,600
	\$10,000
	\$10,000
	\$12,634
	\$14,000
	\$14,407
	\$15,000
	\$15,000
	\$15,000
	\$15,368
	\$16,000
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	\$25,000
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	\$26,500
	\$27,000
	\$27,000
	\$27,974
	\$28,000
	\$28,000
	\$30,000
	\$30,000
	\$31,000
	\$32,893
	\$35,000
	\$35,000
	\$35,600
	\$37,756
	\$40,000
	\$41,000
	\$42,252
	\$48,000

This template calculates the nonresponse bias analysis for your survey.

Enter the number of respondents with each characteristic in column C. Then enter the number of nonrespondents with each characteristic in column E.

The average absolute relative bias will be automatically calculated in cell I10.

Graduate characteristic	Number of respondents	Percentage of respondents	Number of nonrespondents	Percentage of nonrespondents	Estimated bias	Relative bias	Absolute value of relative bias
Total	34		6				
Graduates with Pell Grants		0.00		0.00	0.00	#DIV/0!	#DIV/0!
Graduates with a zero expected family contribution		0.00		0.00	0.00	#DIV/0!	#DIV/0!
Females		0.00		0.00	0.00	#DIV/0!	#DIV/0!
<b>AVERAGE</b>							<b>#DIV/0!</b>

**N/A since response rate is >80%**

**From:** Lacey, Aaron D.  
**Sent:** 30 Jun 2017 20:41:50 +0000  
**To:** AltEarningsAppeals  
**Cc:** 'Rene Crosswhite'  
**Subject:** Vatterott College (OPEID: 025997-00): Alternate Earnings Appeal  
**Attachments:** Vatterott College-Berkeley CEO Certification.pdf, Vatterott 2015 RGEES Attestation Report - Final.pdf

Dear FSA:

Our law firm represents Vatterott Educational Centers, Inc. Attached, please find the Alternate Earnings Appeal documentation for Vatterott College - Berkeley (OPEID: 025997-00), which we are timely submitting on behalf of our client. If you have any questions, please do not hesitate to contact me.

Kind regards,

**Aaron D. Lacey**

alacey@thompsoncoburn.com  
P: 314.552.6405  
F: 314.552.7000  
M: 314.602.6405

**Thompson Coburn LLP**

One US Bank Plaza  
St. Louis, Missouri 63101  
[www.thompsoncoburn.com](http://www.thompsoncoburn.com)

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June 30, 2017

Vatterott College - Berkeley OPEID: 025997-00

**CEO Certification**

Issued in Connection with Compliance Attestation Examination of the Standards for Conducting the Recent Graduates Employment and Earnings Survey for Debt Measurement Year 2015

Contact Information: Rene Crosswhite, President and Chief Executive Officer  
8580 Evans Avenue | Berkeley, MO 63134  
(314) 264-1862 | [rene.crosswhite@vatterott.edu](mailto:rene.crosswhite@vatterott.edu)

Dear FSA:

I, Rene Crosswhite, do hereby certify (1) that Vatterott Educational Centers, Inc. (OPE ID: 02599700) administered the Recent Graduates Employment and Earnings Survey for its Building Maintenance Technology Associate Degree program (CIP Code: 46.0499) in accordance with the *Standards for Conducting the Recent Graduates Employment and Earnings Study*, and (2) that the mean or median earnings used to recalculate the debt-to-earnings ratios was accurately determined from the survey results.

Sincerely,

(b)(6)

Rene Crosswhite  
President

OPE ID#: 02599700

**VATTEROTT EDUCATIONAL CENTERS, INC.  
D/B/A VATTEROTT COLLEGE  
COMPLIANCE ATTESTATION EXAMINATION OF  
THE STANDARDS FOR CONDUCTING  
THE RECENT GRADUATES EMPLOYMENT AND EARNINGS SURVEY  
DEBT MEASUREMENT YEAR 2015**

**VATTEROTT EDUCATIONAL CENTERS, INC.  
D/B/A VATTEROTT COLLEGE**

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**REPORT ON COMPLIANCE WITH SPECIFIED  
REQUIREMENTS APPLICABLE TO THE STANDARDS FOR CONDUCTING THE  
RECENT GRADUATES EMPLOYMENT AND EARNINGS SURVEY**

**INDEPENDENT ACCOUNTANTS' REPORT**

To the Stockholders  
Vatterott Educational Centers, Inc. d/b/a Vatterott College

**Report on Compliance with Specified Requirements Applicable to the Standards  
for Conducting the Recent Graduates Employment and Earnings Survey**

We have examined management's assertions, that Vatterott Educational Centers, Inc. d/b/a Vatterott College conducted its Recent Graduates Employment and Earnings Survey for the Year 2015 in accordance with the requirements set forth in the Standards for Conducting the Recent Graduates Employment and Earnings Survey listed in Appendix A of the *Best Practices Guide for Recent Graduates Employment and Earnings Survey* published in November 2015.

**Management's Responsibility**

Management is responsible for conducting the Recent Graduates Employment and Earnings Survey in accordance with the requirements set forth in the Standards for Conducting the Recent Graduates Employment and Earnings Survey listed in Appendix A of the *Best Practices Guide for Recent Graduates Employment and Earnings Survey* published in November 2015.

**Accountants' Responsibility**

Our responsibility is to express an opinion on Vatterott Educational Centers, Inc.'s d/b/a Vatterott College compliance based on our examination of the types of compliance requirements referred to above. We conducted our examination of compliance in accordance with *Government Auditing Standards*, issued by the Comptroller General of the United States; attestation standards established by the American Institute of Certified Public Accountants; and the *Best Practices Guide for Recent Graduates Employment and Earnings Survey* issued by the U.S. Department of Education in November 2015, and accordingly, included examining, on a test basis, evidence about Vatterott Educational Centers, Inc.'s d/b/a Vatterott College compliance with those requirements and performing such other procedures as we considered necessary in the circumstances.



We believe that our examination provides a reasonable basis for our opinion on compliance with the Standards for Conducting the Recent Graduates Employment Survey. However, our examination does not provide a legal determination on Vatterott Educational Centers, Inc.'s d/b/a Vatterott College compliance with specified requirements.

### **Basis for Qualified Opinion on Compliance with the Standards for Conducting the Recent Graduates Employment Survey**

As described in the accompanying schedule of findings and questioned costs, the results of our testing of the Nonresponse Bias Analysis disclosed that the Institution had an average relative bias due to nonreponse in the data for recent graduates surveyed that exceeded ten percent.

### **Qualified Opinion on Compliance with the Standards for Conducting the Recent Graduates Employment Survey**

In our opinion, except for the noncompliance described in the "Basis for Qualified Opinion on Compliance with the Standards for Conducting the Recent Graduates Employment Survey" paragraph, Vatterott Educational Centers, Inc. d/b/a Vatterott College complied with the types of compliance requirements referred to above that could have a direct and material effect on its survey appeal conforming to the Standards for Conducting the Recent Graduates Employment and Earnings Survey for the programs subject to the Department of Education's Gainful Employment regulations for Debt Measurement Year 2015.

### **Other Matters**

Vatterott Educational Centers, Inc.'s d/b/a Vatterott College results from the Recent Graduates Employment and Earnings Survey is presented in the accompanying Survey Information Table. Vatterott Educational Centers, Inc.'s d/b/a Vatterott College response to the schedule of findings and questioned costs is described in the accompanying Corrective Action Plan. The Survey Information Table and Corrective Action Plan were not subjected to the testing procedures applied in the examination of compliance, and accordingly, we express no opinion on the Survey Information Table nor the Corrective Action Plan..

### **Purpose of this Report**

This report is intended solely for the information and use of the audit committee, management, and U.S. Department of Education, and is not intended to be and should not be used by anyone other than these specified parties.

*Knuttle & Associates, P.C.*

June 30, 2017  
Darien, Illinois

**VATTEROTT EDUCATIONAL CENTERS, INC.  
D/B/A VATTEROTT COLLEGE  
STANDARDS REGARDING RECENT GRADUATES  
EMPLOYMENT AND EARNINGS SURVEY  
DEBT MEASUREMENT YEAR 2015**

Vatterott Educational Centers, Inc. d/b/a Vatterott College (the "Institution") asserts that the Standards for Conducting the Recent Graduates Employment and Earnings Survey for Debt Measurement Year 2015 were followed as listed below:

1. Planning Your Data Collection
2. Data Collection Methodology
3. Maintaining Confidentiality
4. Data Editing
5. Calculation of Response Rates
6. Nonresponse Bias Analysis
7. Calculating the Mean and Median
8. Documenting a Survey System

**VATTEROTT EDUCATIONAL CENTERS, INC.  
D/B/A VATTEROTT COLLEGE  
SCHEDULE OF FINDINGS AND QUESTIONED COSTS  
DEBT MEASUREMENT YEAR 2015**

**Finding No. 1:**

In order to demonstrate compliance with Standard 6 - Nonresponse Bias Analysis, an Institution with a unit response rate between fifty and eighty percent must have an average absolute value of relative bias for the percent of graduates who received a Pell grant, the percent with a zero expected family contribution and the percent female within an individual program of less than ten percent.

The Institution's Nonresponse Bias Analysis is calculated as follows:

Graduate characteristic	Number of respondents	Percentage of respondents	Number of nonrespond.	Percentage of Nonrespond.	Estimated bias	Relative bias	Absolute value of relative bias
Total	41		36				
Graduates with Pell Grants	37	90.24	35	97.22	-3.26	-3.49	3.49
Graduates with a zero expected family contribution	25	60.98	29	80.56	-9.15	-13.05	13.05
Females	2	4.88	0	0.00	2.28	87.80	87.80
<b>Average</b>							<b>34.78</b>

**VATTEROTT EDUCATIONAL CENTERS, INC.  
D/B/A VATTEROTT COLLEGE  
SURVEY INFORMATION TABLE  
DEBT MEASUREMENT YEAR 2015**

Program: Building/Construction Finishing, Management, and Inspection Other.  
CIP: 460499

From the RGEES Platform Reports:	
Adjusted Vetted Cohort Response Rate	53.2%
Average of Absolute Values of Relative Bias	35%
Mean Earnings	\$31,885
Median Earnings	\$28,000

	Standard Rates		Transitional Rates		Result
	Annual	Discretionary	Annual	Discretionary	
Original	14.21	56.22	19.02	75.26	Fail
Appeal*	10.53	23.60	14.10	31.59	Zone

\* For a valid appeal, when the Average Vetted Cohort Response Rate is less than 80%, the Average of Absolute Values of Relative Bias must be less than 10% which was not met.

June 30, 2017

Vatterott College - Berkeley OPEID: 025997-00  
Corrective Action Plan  
Compliance Attestation Examination of the Standards for Conducting  
the Recent Graduates Employment and Earnings Survey for Debt Measurement Year 2015

Contact Information: Rene Crosswhite, President and Chief Executive Officer  
8580 Evans Avenue | Berkeley, MO 63134  
(314) 264-1862 | rene.crosswhite@vatterott.edu

Schedule of Findings Submitted by Knutte & Associates, P.C.:

**Finding No. 1**

In order to demonstrate compliance with Standard 6 (Nonresponse Bias Analysis) of the *Standards for Conducting the Recent Graduates Employment and Earnings Study* (the "Standards"), published by the U.S. Department of Education (the "Department") as Appendix A to its *RGEES Best Practices Guide*, for an Institution with a unit response rate between fifty and eighty percent, the average relative bias computed over the percent of graduates who received a Pell grant, the percent with a zero expected family contribution, and the percent female within an individual program must not exceed ten percent.

The nonresponse bias analysis calculated by Vatterott Educational Centers, Inc. (OPE ID: 02599700) ("Vatterott") for its Building Maintenance Technology Associate Degree program (CIP Code: 46.0499) (the "Program") revealed an average relative bias that exceeded the ten percent threshold.

**Response**

As the Department explains in its *RGEES Best Practices Guide*, its nonresponse bias test "measures whether graduates who respond to the survey have different earnings than graduates who do not respond to the survey. For example, if graduates with low income are less likely to answer this survey, then the income calculated from survey responses will seem higher than it truly is."

In the Guide, the Department identifies three variables that, according to its data, are correlated with earnings: graduates with Pell grants, graduates with a zero expected family contribution, and graduates who are female. The Department's nonresponse bias test is designed to determine whether a school's respondent cohort is sufficiently similar to the graduate cohort with regard to these three variables. In the event one or all of these variables is sufficiently underrepresented in the respondent cohort, the Department's nonresponse bias test suggests that the earnings are inflated.

Of the 77 graduates included in Vatterott's surveyed graduate cohort, two were women. When Vatterott conducted its survey, both women responded. Because both women responded, the RGEES Platform indicated that the ten percent nonresponse bias threshold had been exceeded, calculating an average relative bias of 34.78 percent.

In this specific instance, however, the nonresponse bias threshold was exceeded because one of the three variables (graduates who are female) was overrepresented in the respondent cohort, meaning that the income calculated from survey responses may seem lower than it truly is, not higher. Unfortunately, though the purpose of the nonresponse bias analysis is to prevent the use of inflated earnings in the debt-to-earnings ratio, the Department's nonresponse bias test does not distinguish between whether earnings may be overstated or understated due to bias.

**Corrective Action**

Understanding that its original respondent cohort did not satisfy the bias parameters set out in the Standards, Vatterott excluded from its survey cohort the response of one of the two women respondents. By excluding this response, Vatterott created a respondent cohort that passed the Department's nonresponse bias test, as well as the response rate standard, and still produced an income number that, if accepted by the Department, would place the Program's Debt-to-Earnings ratio in the Zone. Following, Vatterott sets out the revised Nonresponse Bias Analysis, which shows an average relative bias of 7 percent.

Graduate Characteristic	Number of Graduates	Percentage of Graduates	Number of Respondents	Percentage of Respondents	Estimated Bias	Absolute Value of Relative Bias
Pell grant recipient	72	93.5	36	90	3.5	0.04
Zero expected family contribution	54	70.1	24	60	10.1	0.14
Female	2	2.6	1	2.5	0.1	0.04
<b>Average of absolute values of relative bias</b>						<b>0.07</b>

(b)(6)

Rene Crosswhite  
President

**From:** Lacey, Aaron D.  
**Sent:** 13 Jan 2017 16:52:20 +0000  
**To:** AltEarningsAppeals  
**Cc:** Rene Crosswhite  
**Subject:** Vatterott College-Berkley (OPEID: 02599700): Notice of Intent to File Alternate Earnings Appeal  
**Attachments:** 2017-1-13 VEC GE Appeal Notice (02599700).pdf

Dear GE Operations:

By the attached letter, and in accordance with the instructions set out in *Gainful Employment Electronic Announcement #95 - Debt-to-Earnings Rate Alternate Earnings Appeals*, **Vatterott College-Berkley (OPEID: 02599700)**, hereby notifies the Department of its intent to file an Alternate Earnings Appeal.

**We respectfully request that the Department confirm that this email has been received and that this Notice of Appeal has been accepted.**

Sincerely,

Aaron  
Regulatory Counsel to Vatterott College

**Aaron D. Lacey**  
[alacey@thompsoncoburn.com](mailto:alacey@thompsoncoburn.com)  
P: 314.552.6405  
F: 314.552.7000  
M: 314.602.6405

**Thompson Coburn LLP**  
One US Bank Plaza  
St. Louis, Missouri 63101  
[www.thompsoncoburn.com](http://www.thompsoncoburn.com)

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January 13, 2017

**Sent Via Electronic Mail**

Alternate Earnings Appeals, GE Operations  
Federal Student Aid  
[AltEarningsAppeals@ed.gov](mailto:AltEarningsAppeals@ed.gov)

**Re: Vatterott College (OPEID 02599700): Notice of Intent to File Alternate Earnings Appeal**

Dear GE Operations:

In accordance with the instructions set out in *Gainful Employment Electronic Announcement #95 - Debt-to-Earnings Rate Alternate Earnings Appeals*, **Vatterott College-Berkley (OPEID: 02599700)**, hereby notifies the Department of its intent to file an Alternate Earnings Appeal for the following program(s):

CIP Code	Credential Level	Program Name
11.0501	Certificate/Diploma	Computer Technology
11.0801	Associate's Degree	Web Design and Multimedia Application
11.1001	Associate's Degree	Computer Systems & Network Technology
12.0401	Certificate/Diploma	Cosmetology
15.0501	Associate's Degree	Environmental Systems Technology
15.1302	Associate's Degree	Computer Aided Drafting Technology
22.0302	Certificate/Diploma	Legal Assistant/Paralegal
46.0302	Associate's Degree	Applied Electrical Technology
46.0499	Associate's Degree	Building Maintenance Technology
46.0503	Certificate/Diploma	Plumbing
46.0503	Associate's Degree	Plumbing Technology
48.0508	Associate's Degree	Combination Welding Technology
51.0713	Associate's Degree	Medical Billing and Coding
51.0799	Certificate/Diploma	Medical Office Assistant
51.0801	Certificate/Diploma	Medical Assistant
51.0801	Associate's Degree	Medical Assistant AAS
51.0805	Certificate/Diploma	Pharmacy Assistant
51.0805	Associate's Degree	Pharmacy Technician

**We respectfully request that the Department confirm that this email has been received and that this Notice of Appeal has been accepted.** If you have any questions, please do not hesitate to contact me at this email address, or by telephone at (314) 264-1862.

Sincerely,

Rene Crosswhite  
President, Vatterott College



**From:** Lacey, Aaron D.  
**Sent:** 13 Jan 2017 16:55:18 +0000  
**To:** AltEarningsAppeals  
**Cc:** Rene Crosswhite  
**Subject:** Vatterott College-Des Moines (OPEID: 02609200): Notice of Intent to File Alternate Earnings Appeal  
**Attachments:** 2017-1-13 VEC GE Appeal Notice (02609200).pdf

Dear GE Operations:

By the attached letter, and in accordance with the instructions set out in *Gainful Employment Electronic Announcement #95 - Debt-to-Earnings Rate Alternate Earnings Appeals*, **Vatterott College-Des Moines (OPEID: 02609200)**, hereby notifies the Department of its intent to file an Alternate Earnings Appeal.

**We respectfully request that the Department confirm that this email has been received and that this Notice of Appeal has been accepted.**

Sincerely,

Aaron  
Regulatory Counsel to Vatterott College

**Aaron D. Lacey**  
[alacey@thompsoncoburn.com](mailto:alacey@thompsoncoburn.com)  
P: 314.552.6405  
F: 314.552.7000  
M: 314.602.6405

**Thompson Coburn LLP**  
One US Bank Plaza  
St. Louis, Missouri 63101  
[www.thompsoncoburn.com](http://www.thompsoncoburn.com)

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January 13, 2017

**Sent Via Electronic Mail**

Alternate Earnings Appeals  
Gainful Employment Operations  
Operations Performance Management Services  
Business Operations  
[AltEarningsAppeals@ed.gov](mailto:AltEarningsAppeals@ed.gov)

**Re: Vatterott College (OPEID 02609200): Notice of Intent to File Alternate Earnings Appeal**

Dear GE Operations:

In accordance with the instructions set out in *Gainful Employment Electronic Announcement #95 - Debt-to-Earnings Rate Alternate Earnings Appeals*, **Vatterott College-Des Moines (OPEID: 02609200)**, hereby notifies the Department of its intent to file an Alternate Earnings Appeal for the following program(s):

CIP Code	Credential Level	Program Name
11.1001	Associate's Degree	Computer Systems & Network Technology
12.0401	Certificate/Diploma	Cosmetology
12.0500	Certificate/Diploma	Culinary Essentials
12.0503	Associate's Degree	Culinary Arts
15.0501	Associate's Degree	Heating, Air Conditioning & Refrigeration Technology
22.0302	Associate's Degree	Paralegal
43.0104	Associate's Degree	Criminal Justice
51.0601	Associate's Degree	Dental Assistant Specialist
51.0710	Certificate/Diploma	Medical Office Assistant
51.0713	Associate's Degree	Medical Billing and Coding
51.0801	Associate's Degree	Advanced Medical Assistant

**We respectfully request that the Department confirm that this email has been received and that this Notice of Appeal has been accepted.**

If you have any questions, please do not hesitate to contact me at this email address, or by telephone at (314) 264-1862.

Sincerely,

Rene Crosswhite  
President  
Vatterott College

**From:** Lacey, Aaron D.  
**Sent:** 13 Jan 2017 16:49:25 +0000  
**To:** AltEarningsAppeals  
**Cc:** Rene Crosswhite  
**Subject:** Vatterott College-Quincy (OPEID: 02069300): Notice of Intent to File Alternate Earnings Appeal  
**Attachments:** 2017-1-13 VEC GE Appeal Notice (02069300).pdf

Dear GE Operations:

By the attached letter, and in accordance with the instructions set out in *Gainful Employment Electronic Announcement #95 - Debt-to-Earnings Rate Alternate Earnings Appeals*, **Vatterott College-Quincy (OPEID: 02069300)**, hereby notifies the Department of its intent to file an Alternate Earnings Appeal.

**We respectfully request that the Department confirm that this email has been received and that this Notice of Appeal has been accepted.**

Sincerely,

Aaron  
Regulatory Counsel to Vatterott College

**Aaron D. Lacey**  
alacey@thompsoncoburn.com  
P: 314.552.6405  
F: 314.552.7000  
M: 314.602.6405

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January 13, 2017

**Sent Via Electronic Mail**

Alternate Earnings Appeals  
Gainful Employment Operations  
Operations Performance Management Services  
Business Operations  
[AltEarningsAppeals@ed.gov](mailto:AltEarningsAppeals@ed.gov)

**Re: Vatterott College (OPEID 02069300): Notice of Intent to File Alternate Earnings Appeal**

Dear GE Operations:

In accordance with the instructions set out in *Gainful Employment Electronic Announcement #95 - Debt-to-Earnings Rate Alternate Earnings Appeals*, **Vatterott College-Quincy (OPEID: 02069300)**, hereby notifies the Department of its intent to file an Alternate Earnings Appeal for the following program(s):

CIP Code	Credential Level	Program Name
12.0500	Certificate/Diploma	Culinary Essentials
12.0503	Associate's Degree	Culinary Arts
51.0801	Certificate/Diploma	Medical Assistant
51.0801	Associate's Degree	Medical Assistant AAS
12.0401	Certificate/Diploma	Cosmetology

**We respectfully request that the Department confirm that this email has been received and that this Notice of Appeal has been accepted.**

If you have any questions, please do not hesitate to contact me at this email address, or by telephone at (314) 264-1862.

Sincerely,

Rene Crosswhite  
President  
Vatterott College

**From:** David Beatson  
**Sent:** 22 Jun 2017 16:48:22 +0000  
**To:** AltEarningsAppeals  
**Subject:** Wichita Technical Institute Gainful Employment Alternate Earnings Appeal  
**Attachments:** Alternate Earnings Appeal - Wichita Technical Institute.pdf

Wichita Technical Institute  
(Main Campus)  
2051 S. Meridian  
Wichita, KS 67213  
(316) 943-2241  
Fax: (316) 943-5438

WTI Topeka Campus  
(Branch Campus)  
3712 SW Burlingame  
Topeka, KS 66609  
(785) 354-4568  
Fax: (785) 354-4541

WTI Joplin Campus  
(Branch Campus)  
1715 N. Range Line Rd.  
Joplin, MO 64801  
(417) 206-9115  
Fax: (417) 206-9124

WTI Tulsa Campus  
(Branch Campus)  
8421 E. 61<sup>st</sup> Street, Ste. U  
Tulsa, OK 74133  
(918) 292-8166  
Fax: (918) 794-4581

WTI East Campus  
(Branch Campus)  
6130 E. Central, Ste 202  
Wichita, KS 67208  
(316) 943-2241  
Fax: (316) 260-1030

[www.wti.edu](http://www.wti.edu)

Dear Secretary of Education:

Please see the attached documentation referencing Wichita Technical Institute's appeal of the Gainful Employment findings. In this appeal, you will find the following:

1. Wichita Technical Institute's narrative appeal, responses to each point in the best practices guide, and organizational adherence thereto (***\*attachments are available upon request, as several of the attachments contain confidential information\****);
2. Recalculated gainful employment rates;
3. A certification signed by the institution's chief executive officer attesting that the survey was conducted in accordance with the Standards for Conducting the Recent Graduates Employment and Earnings Survey and that the mean or median earnings used to recalculate the debt-to-earnings ratios was accurately determined from the survey results; and
4. An examination-level attestation engagement report prepared by an independent public accountant or independent governmental auditor, as appropriate, that the survey was conducted in accordance with the requirements set forth in the Standards for Conducting the Recent Graduates Employment and Earnings Survey. The attestation must be conducted in accordance with the attestation standards contained in the Government Accountability Office's Government Auditing Standards promulgated by the Comptroller General of the United States (available at [www.gao.gov/yellowbook/overview](http://www.gao.gov/yellowbook/overview) or its successor site), and with procedures for attestations contained in guides developed by and available from the Department of Education's Office of Inspector General (See <http://www2.ed.gov/about/offices/list/oig/nonfed/sfgd2000.pdf> and <http://www2.ed.gov/about/offices/list/oig/nonfed/sfa.html>).

Should you have any questions, please let us know. Thank you for your consideration.

**David Beatson | WTI | Main Campus Co-Director**  
2051 S. Meridian | Wichita, Kansas | 67213  
Phone: 316.943.2241 | Fax: 316. 943.5438  
Email: [dbeatson@wti.edu](mailto:dbeatson@wti.edu)



**David Beatson | WTI | Main Campus Co-Director**

2051 S. Meridian | Wichita, Kansas| 67213

Phone: 316.943.2241 | Fax: 316. 943.5438

Email: [dbeatson@wti.edu](mailto:dbeatson@wti.edu)



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1. Responses to GE appeal standards
2. A certification signed by the institution's chief executive officer
3. Auditor attestation
4. DE ratio appeal

## CONFIRMATION THAT STANDARDS FOR CONDUCTING THE RECENT GRADUATES EMPLOYMENT AND EARNINGS SURVEY WERE SATISFIED

### 1. PLANNING YOUR DATA COLLECTION

#### Standard 1:

*The survey design components required to conduct the Recent Graduates Employment and Earnings Survey include a plan that addresses the objectives of the survey, the survey design, the data collection plan, the confidentiality pledge, a data security plan, and the human and fiscal resources and time needed to achieve a high data quality. To meet this standard, the survey design plan must include the following:*

- 1.1: \*A detailed discussion of the goals and objectives of the survey or survey system, including information needs that will be met, content areas included, the list of program completers to be surveyed, and analytic goals (see Standard 8).**

\*This is a starred requirement. The Standards note that schools that have elected to use the RGEES Platform need only address the un-starred requirements.

WTI elected to use the RGEES Platform but, unfortunately, the RGEES Platform was not functioning properly and could not perform the required calculations. The mean/median reports would not calculate any of our proxy surveys. The platform automatically put these surveys into the base cohort and would not process reports for anything other than the adjusted vetted cohort. We experienced similar issues with the non-bias calculations/reports.

The school advised the Department of Education's Gainful Employment Operations Team of these concerns and sought out their assistance in resolving these issues both by telephone and email. Initially, we called the GE Customer Support Center at 877-281-1955 on 3/1/17 at 4:08 p.m. CST to discuss a significant roadblock with the RGEES System. A recorded message advised that operators are available during normal business hours between 8 a.m. and 8 p.m. EST and then we were immediately transferred to a voicemail box and notified that someone would return the call within 48 hours. We left a message detailing the issues with the RGEES Platform (see **Attachment 1.1a**). We called the same number again at 4:30 p.m. CST (3/1/17), received the same message, were immediately transferred to a voicemail box, and we left another message (see **Attachment 1.1b**).

We followed that with an email message to [altearningsappeal@ed.gov](mailto:altearningsappeal@ed.gov) at 4:40 p.m. CST that same day noting:

"We are in the process of finishing our appeal and are having difficulties with RGEES reporting. The mean/median reports will not calculate any of our proxy surveys. RGEES automatically puts these surveys into the base cohort and it will not process reports for anything other than the adjusted vetted cohort. We are also having this issue with the non-bias reports. Please let me know how I should proceed." (See **Attachment 1.1c**)

On 3/2/17 at 8:16 a.m. CST, a representative of the Gainful Employment Operations Team responded as follows:



“Regrettably, there is no technical assistance available for the RGEES Platform. The Platform was designed for the convenience of schools (should they opt to use it) under a contract that did not provide for a help desk or conduit through which technical questions might be directed. We do publish a RGEES Technical Guide, available under the Resource heading of the GE section on IFAP. If you are unable to use the RGEES Platform, we recommend conducting the institutional earnings survey through some other means, in accordance with RGEES standards.” (See **Attachment 1.1d**)

With that said, it merits noting that the DOE’s Final-Debt-to-Earnings Rates (Final D/E Rates) notification advised that one of our Gainful Employment (GE) programs, the Medical Assistant program, failed to meet the mandated graduate earnings requirements. The goals and objectives of the survey was to obtain the necessary data to appeal and successfully challenge the earnings data used to calculate the Final-Debt-to-Earnings Rates (Final D/E Rates) for that GE program. (Please refer to Standard 8).

- 1.2: \*A listing of all survey data items. It is preferred that only RGEES items appear in the survey used to collect data for the Gainful Employment Regulations earnings appeal process.**

**If the survey provided by ED is administered in conjunction with another survey of program completers, the RGEES questions must be used intact. That is, no alteration of the wording of the survey questions is permitted, and the order of individual items must be preserved.**

**Any additional items must be separate and not applicable to the Gainful Employment issue. These additional items can be added only at the end of the survey to avoid affecting the responses to questions provided in the Recent Graduates Employment and Earnings Survey.**

**Only data from the RGEES questions may be used in an appeal.**

\*This is a starred requirement. The Standards note that schools that have elected to use the RGEES Platform need only address the un-starred requirements.

As noted in our response to question 1.1 immediately above, WTI elected to use the RGEES Platform but, unfortunately, the RGEES Platform was not functioning properly and could not perform the required calculations

Nonetheless, it bears noting that the bulk of the initiative was driven by the Survey Monkey email campaigns, wherein the RGEES questions were used intact, no alteration of the wording took place, and the order of the individual items was preserved (see **Attachment 1.2a**).

- 1.3: The anticipated data collection procedures must include the elements that follow.**

**1. Timing of Data Collection;**

The relevant cohort for the affected Medical Assistant program consisted of 398 graduates. Keeping in mind that the results of the RGEES, including the required auditor’s attestation and all supporting documentation, must be delivered to the Department of Education no later than 60 days after the date of the Notice of Determination, the school calculated that the collection process would take a minimum of 30 to 40 days to achieve our goal of receiving a minimum

response from at least 50% of those graduates. We began planning, training, and preparing for this process in early January, 2017.

The bulk of the initiative was driven by the Survey Monkey email campaigns (see response to question 1.2 immediately above) with follow-up phone calls and text messages conducted by the project staff. Even then, our staff was advised to direct graduates to their email and/or to update their respective email addresses. By driving such a simple initiative, we were able to focus our approach around the email campaign method throughout, and streamline data collection through Survey Monkey. This also limited the personally identifiable information (PII) that project staff could access throughout the process; and, since they were privy only to name, email address, and phone numbers, served as an additional measure of protection for the PII.

In the rare event that a graduate expressed interest in completing the survey, but did not have access to email, they were offered the opportunity to schedule a time to complete a paper survey on campus. These surveys would be distributed by a member of the Career Services team or an administrative assistant, and taken directly to our marketing director, Rob Winn, upon completion. The results of any such paper surveys were scanned, and can be viewed at **Attachment 1.3.1**.

Data collection began on 1/24/17 and ended on 2/26/17 after we obtained 205 responses and achieved our goal of receiving a 50% minimum response from the 398 graduates in the cohort. Email campaigns were launched on 1/24/17, 1/26/17, 2/3/17, 2/10/17, 2/16/17, 2/21/17, and 2/24/17. Between these campaigns, our project team made diligent efforts to contact completers utilizing their most recent contact information, and encouraged them to complete the information via tiered incentives that increased in value as we neared our deadline. This outreach consisted of phone calls, emails, and text messaging via the Text Magic software.

**2. Primary mode of collection (email, mail survey, telephone, or in-person interview) (See RGEES Best Practice Guide; for information based on OMB "Guidance on Agency Survey Statistical Information Collections," 1/20/2006);**

The bulk of the initiative was driven by the Survey Monkey email campaigns (see response to question 1.2 immediately above) with follow-up phone calls and text messages conducted by the project staff. Even then, our staff was advised to direct graduates to their email and/or to update their respective email addresses. By driving such a simple initiative, we were able to focus our approach around the email campaign method throughout, and streamline data collection through Survey Monkey. This also limited the personally identifiable information (PII) that project staff could access throughout the process; and, since they were privy only to name, email address, and phone numbers, served as an additional measure of protection for the PII.

In the rare event that a graduate expressed interest in completing the survey, but did not have access to email, they were offered the opportunity to schedule a time to complete a paper survey on campus. These surveys would be distributed by a member of the Career Services team or an administrative assistant, and taken directly to our marketing director, Rob Winn, upon completion. The results of any such paper surveys were scanned, and can be viewed at **Attachment 1.3.1**.

**3. Data collection protocol to be used by data collection staff;**

The bulk of the initiative was driven by the Survey Monkey email campaigns (see response to question 1.2 immediately above) with follow-up phone calls and text messages conducted by the project staff. Even then, our staff was advised to direct graduates to their email and/or to update their respective email addresses. By driving such a simple initiative, we were able to focus our approach around the email campaign method throughout, and streamline data collection through Survey Monkey. This also limited the personally identifiable information (PII) that project staff could access throughout the process; and, since they were privy only to name, email address, and phone numbers, served as an additional measure of protection for the PII.

In the rare event that a graduate expressed interest in completing the survey, but did not have access to email, they were offered the opportunity to schedule a time to complete a paper survey on campus. These surveys would be distributed by a member of the Career Services team or an administrative assistant, and taken directly to our marketing director, Rob Winn, upon completion. The results of any such paper surveys were scanned, and can be viewed at **Attachment 1.3.1**.

Data collection began on 1/24/17 and ended on 2/26/17 after we obtained 205 responses and achieved our goal of receiving a 50% minimum response from the 398 graduates in the cohort. Email campaigns were launched on 1/24/17, 1/26/17, 2/3/17, 2/10/17, 2/16/17, 2/21/17, and 2/24/17. Between these campaigns, our project team made diligent efforts to contact completers utilizing their most recent contact information, and encouraged them to complete the information via tiered incentives that increased in value as we neared our deadline. This outreach consisted of phone calls, emails, and text messaging via the Text Magic software.

#### **4. Training of survey collection staff and persons coding and editing the data;**

We used experienced staff member that were versed in techniques to build cooperation and rapport. The rapport-building techniques included respect for respondents' rights and time, follow-up skills, knowledge of the goals and objectives of the data collection, and knowledge of the uses of the collected data. The goals of the survey, method of data collection, and time commitment were clearly stated by the interviewers interacting with graduates.

We also stressed the importance of using the school's logo, color scheme, and name in conjunction with the RGEES to help increase the response rates. In addition to explaining the importance of the survey to the program, we also made it clear to program graduates that the RGEES is officially sanctioned by both the institution and the Department of Education.

Lastly, the survey collection staff reviewed the applicable legal constraints and protections on the use and distribution of personally identifiable information (PII). They also received training regarding the confidentiality of the data being collected; were reminded of their legal responsibility to protect the confidentiality of the data being collected; and, were required to sign a certification that they would use their best efforts to maintain that confidentiality. A Summary of school's efforts to provide training to maintain the confidentiality of personal Identifiable Information (PII) is included as **Attachment 1.3.4a**, and a copy of the Certification of RGEES Project Staff Regarding Duty to Maintain Confidentiality of Personal Identifiable Information (PII), is included as **Attachment 1.3.4b**.

#### **5. Anticipated response rate for the data collection (see Standard 5.1); and**

We had a goal of achieving a minimum response rate of 50% of all graduates in the cohort who filled out at least one of the earnings items which is a sufficient amount to properly determine whether the respondents had earnings and to support reporting the respondent's total earnings (including 0 earnings) and thus satisfy the requirements of the appeal process. We began the process on January 24, 2017 and achieved our goal on February 26, 2017 (for more detail and confirmation of same refer back to our response to question 1.3.1 immediately above).

**6. Methods used to achieve acceptable response rates (see Standard 2).**

The school followed the suggested data collection instruments and methods set out in the RGEES Best Practices Guide. Adhering to the Best Practices Guide allowed us to administer data collection instruments and methods in a manner that achieves the best balance between maximizing data quality and controlling measurement error while minimizing respondent burden using best practices established in the field of survey methodology. This methodology involved the following:

- a. We encouraged respondents to participate to maximize response rates and improve data quality by sending information about the survey administered; clearly stated the goals of the survey; respected graduates' time and preferences; advised graduates how long they could expect the survey to take, that it would be free to them, and that their responses would be kept confidential; offered respondents encouragements for their cooperation; varied the methods of communication; and, used institutional branding.
- b. We established protocols for computer systems to ensure that the Internet data collection functioned correctly (for more detail and confirmation of same refer back to our response to question 1.3.3 immediately above).
- c. Used more than one mode of data collection, such as mailings, email and telephone calls, as well as offering tiered incentives that increased in value as we neared our deadline date, to improve response rates (for more detail and confirmation of same refer back to our response to question 1.3.3 immediately above).
- d. Established the data collection protocol to be followed by the staff involved in the data collection process (for more detail and confirmation of same refer back to our responses to questions 1.3.3 and 1.3.4 immediately above).

**1.4: \*A disclosure pledge (see Standard 3.1).**

\*This is a starred requirement. The Standards note that schools that have elected to use the RGEES Platform need only address the un-starred requirements.

As noted in our response to question 1.1 above, WTI elected to use the RGEES Platform but, unfortunately, the RGEES Platform was not functioning properly and could not perform the required calculations

Nonetheless, in response to this particular question please refer back to the response to question 1.3.4 immediately above and **Attachments 1.3.4a** and **1.3.4b**.

**1.5: A security plan for preserving the confidentiality of the data during collection, processing, and analysis (see Standard 3.2 for details).**

All surveys will be administered through SurveyMonkey. SurveyMonkey security policies can be viewed in **Attachment 2.2.2b**. A single account will be utilized by Rob Winn to process and export all results in the SurveyMonkey system. All key personnel involved in the process will sign a confidentiality pledge, see **Attachment 1.3.4b**. A secure file share will be setup on the WTI network that will be accessible to authorized personnel only. This file share will be utilized by key personnel to share data when necessary. When data needs to be shared externally with the auditors, a secure Dropbox folder will be created with access permitted only to the auditors and key personnel.

**1.6: If data may be used now or in the future for any purpose beyond the appeal, provide a disclosure analysis plan that describes how disclosure risk will be controlled (see Standard 3.3 for details).**

The data within will not be used in the future for any purpose beyond the appeal, nullifying the need for a disclosure analysis plan and related risk disclosure discussion.

**1.7: Outline the quality assurance plan for each phase of the survey process that will permit monitoring and assessing the performance during implementation.**

Site supervisors were identified for each campus location that participated in the appeal process: Topeka, Wichita (both Main and East), and Joplin. Those site supervisors were the Campus Directors, and were ultimately responsible for ensuring that their respective project staff were operating under the guidelines established throughout. Background screens for those site supervisors are included as **Attachment 1.7**. It is worth noting that no background screen was included for our Wichita East Campus Director because all activity in Wichita was conducted at the Main Campus location.

With the sheer scope of the project, it was important to have a pulse on the activity that supported the surveying initiatives, and seeing as how all work was done on-site by WTI employees, Campus Directors were the logical choice.

**1.8: Outline the general parameters for monitoring nonresponse and evaluating survey procedures and results (see Standards 5 and 6 for details).**

As data was collected via the SurveyMonkey platform, we evaluated the need for additional calls, texts, and email campaigns based off of the response rate. To hit the minimum 50% required (or 199 result from a cohort of 398 graduates), we were diligently reaching out to cohort graduates between SurveyMonkey campaigns, which played a significant role in our ability to meet the standard. We also tiered the incentives as we neared the deadline, as we didn't hit the minimum 50% mark until Friday, February 24, 2017.

**1.9: Identify and monitor key milestones of the survey and time relationship among them.**

We reached the halfway point (100 results) on February 10, 2017, and the minimum requirement of 199 on February 24<sup>th</sup>, just two weeks later.

**1.10: An estimate of the target time period needed for the full survey cycle, including the estimated times for the items that follow:**

**1. Planning and development;**

We began planning for the appeal process in early January 2017.

**2. Data Collection;**

We began data collection on January 24, 2017, and completed on February 26, 2017.

**3. \*Processing and data editing;**

\*This is a starred requirement. The Standards note that schools that have elected to use the RGEES Platform need only address the un-starred requirements.

As noted in our response to question 1.1 above, WTI elected to use the RGEES Platform but, unfortunately, the RGEES Platform was not functioning properly and could not perform the required calculations

Nonetheless, in response it bears noting that once the data collection was completed on February 24, 2017, we began processing the data on February 27, 2017.

**4. Disclosure avoidance plan and analysis, if data will be used for any purpose other than the aggregated data from the RGEES;**

Not applicable – data will not be used for any other purpose other than the aggregated data from the RGEES.

**5. File construction;**

We began file construction the week of February 27, 2017.

**6. Survey documentation; and**

We began documenting the results the week of February 27, 2017.

**7. \*Completion and review of the reporting template and any additional internal reports.**

\*This is a starred requirement. The Standards note that schools that have elected to use the RGEES Platform need only address the un-starred requirements.

As noted in our response to question 1.1 above, WTI elected to use the RGEES Platform but, unfortunately, the RGEES Platform was not functioning properly and could not perform the required calculations

Nonetheless, in response it bears noting that once the data collection was completed on February 24, 2017, we began processing the data on February 27, 2017.

## 2. DATA COLLECTION METHODOLOGY

Standard 2:

*Administer data collection instruments and methods in a manner that achieves the best balance between maximizing data quality and controlling measurement error while minimizing respondent burden using best practices established in the field of survey methodology.*

**2.1: Encourage respondents to participate to maximize response rates and improve data quality. (See the RGEES Best Practices Guide for data collection strategies that can be used to achieve high response rates).**

We followed the RGEES Best Practices Guide for data collection strategies in an effort to achieve high response rates. We made it clear to contacted graduates that the survey would be of no cost to them personally and that their participation can only help our appeal process and thereby help validate their program of study. We tried to be respectful of the graduates' wishes and possible time constraints. Let them know immediately how long it would take and that the information they provided would be used as part of the appeals process only. We also tried to impress upon the graduates the importance of the appeal process and encouraged their prompt cooperation by offering monetary encouragements.

**2.2: Design and administer the data collection to achieve the best data quality possible. Doing so requires the steps that follow.**

**1. Identify the appropriate methods/modes (e.g., e-mail, mail, telephone, Internet) of data collection for recent program completers, the objectives of the data collection, the resources available, and time constraints.**

We utilized e-mail as our main mode of collection with phone calls supporting our efforts. Surveys were sent out via SurveyMonkey. Additional details are provided in our responses to Standard 8 below which describe in more detail how we utilized SurveyMonkey and its various features. The emails sent throughout the process can be seen in **Attachment 1.2a**. Moreover, when we encountered email addresses that were no longer valid, phone calls were utilized to get updated emails and encourage graduates to complete the survey.

The objectives of the data collection were to gather information for the appeal that would more accurately reflect the success of our graduates.

The resources available can be seen in **Attachment 2.2.1** and reflect key personnel that were identified for the project. As the time constraints presented a real challenge, we began the process of planning the appeal in early January and the deadline for completion was March 10<sup>th</sup>. Our first email blast was sent on January 24<sup>th</sup>. The time constraints were further intensified by the fact that we had to allow sufficient time following the completion of the RGEES to obtain an examination-level attestation engagement report prepared by an independent public accountant attesting that the survey was conducted in accordance with the requirements set

forth in the Standards for Conducting the Recent Graduates Employment and Earnings Survey. This attestation had to be conducted in accordance with the attestation standards contained in the Government Accountability Office's Government Auditing Standards promulgated by the Comptroller General of the United States and had to be included with the formal submission of our appeal.

**2. When using the RGEES platform, or any other electronic data collection system, establish protocols for computer systems to ensure that Internet data collection functions correctly (see the RGEES Platform User Guide on how to install/use the platform);**

The internet data collection system we utilized was SurveyMonkey. SurveyMonkey was capable, through a subscription upgrade we purchased, of providing both the necessary security and desired per-graduate personalization so that each graduate could confirm their identity as required by the first question in the survey. SurveyMonkey also allowed for increased personalization by sending out emails addressed to each graduate's first name. This was accomplished by unloading a csv file each time a batch of emails was sent with a student's first name, last name, and email address. SurveyMonkey also ensured data integrity by not allowing for any response modification and requiring HTTPS for any email surveys used by the system.

The survey questions utilized only the best practices guide questions to avoid any possible conflicts. See **attachment 2.2.2a** for a summary of the SurveyMonkey settings utilized with each email send. Documentation of SurveyMonkey security policies can be found in **attachment 2.2.2b**. Furthermore, if requested, we can readily replicate a similar experience to that of the cohort graduates by simply sending an identical sample email demonstrating the personalization and use of HTTPS as was utilized in our electronic data collection.

**3. Use more than one mode of data collection to improve response rates and/or if needed to meet response rate requirements (e.g., follow up non-respondents in a mail or Internet survey with telephone calls. (See Standard 5.2 and the Data Collection section in the RGEES Best Practices Guide for additional guidance on response modes); and**

The school followed the suggested data collection instruments and methods set out in the RGEES Best Practices Guide. Following the Best Practices Guide allowed us to administer data collection instruments and methods in a manner that achieves the best balance between maximizing data quality and controlling measurement error while minimizing respondent burden using best practices established in the field of survey methodology. This methodology involved the following:

- a. We encouraged respondents to participate to maximize response rates and improve data quality by sending information about the survey administered; clearly stated the goals of the survey; respected graduates' time and preferences; advised graduates how long they could expect the survey to take, that it would be free to them, and that their responses would be kept confidential; offered respondents encouragements for their cooperation; varied the methods of communication; and,



used institutional branding (for more detail and confirmation of same see our responses to questions 1.3.1 through 1.3.6 above).

- b. We established protocols for computer systems to ensure that the Internet data collection functioned correctly (for more detail and confirmation of same see our responses to questions 1.3.1 through 1.3.6 above).
- c. Used more than one mode of data collection, such as mailings, email and telephone calls, as well as offering tiered incentives that increased in value as we neared our deadline date, to improve responses (for more detail and confirmation of same see our responses to questions 1.3.1 through 1.3.6 above).
- d. Established the data collection protocol to be followed by the staff involved in the data collection process (for more detail and confirmation of same see our responses to questions 1.3.1 through 1.3.6 above).

**4. Establish the data collection protocol to be followed by the staff involved in the data collection (see the RGEES Best Practices Guide).**

A summary of the established data collection protocol to be followed by the staff involved in the data collection process is set out in our responses to 1.3 above (for more detail and confirmation of same see our responses to questions 1.3.1 through 1.3.6 above).

**2.3: Monitor data collection activities.**

- 1. Use internal reporting systems that provide timely reporting of response rates and the reasons for nonresponses throughout the data collection (e.g., paradata, such as refusals, hard to locate cases). These systems should be flexible enough to identify important subgroups with low response rates for more intensive follow-ups. The RGEES Platform has a participation rate reporting function that supports this monitoring.**

Data collection was done through SurveyMonkey, and follow-up/reporting was evaluated every few days as we pursued the 50% completion benchmark.

- 2. Specify procedures to use to identify and correct problems. (See the RGEES Best Practices Guide for details).**

Unique scenarios did develop, and were handled on a case-by-case basis. An example of such unique scenarios was updating and correcting student last names brought about by changes in marital status. See **Attachment 2.3.2**.

**3. MAINTAINING CONFIDENTIALITY**

**Standard 3:**

*Federal law requires that the confidentiality of data that contain information about individuals (i.e., personally identifiable information or PII) must be protected (20 U.S.C. 1232g). Anyone who will have access to the information must understand the importance of protecting the confidentiality of the survey*

*respondents' information, be cognizant of the requirements of the law, and monitor the confidentiality of PII in their daily activities and in the release of information to the public. Steps must be taken throughout the data collection, processing, and reporting activities to ensure that data are handled in such a way as to avoid disclosure of PII.*

#### LEGAL REQUIREMENTS:

*The Family Educational Rights and Privacy Act (FERPA) (20 U.S.C. 1232g) and any relevant state confidentiality or privacy laws apply to personally identifiable information used or collected in the survey. Data that include personally identifiable information from students' education records are protected under FERPA and may only be used for the evaluation of federally supported education programs or for conducting studies for, or on behalf of, educational agencies or institutions to improve instruction.*

**3.1: \*The Recent Graduates Employment and Earnings Survey uses the graduation/completion status of program participants, student background information, and their contact information from the students' education records for graduates of a specific Gainful Employment program as part of the evaluation of Title IV-supported gainful employment education programs. This information is protected by FERPA. The respondents must be informed of these protections, and must be assured that their individual data, including their employment and earnings data, will be protected from unauthorized disclosure, will be combined with those of other respondents from their program, and will only be reported in the aggregate when there are a sufficient number of graduates to protect each respondent's data. Note that the reporting rule in the Gainful Employment Regulations requires 30 cases to report data for a program (Section 668.402).**

\*This is a starred requirement. The Standards note that schools that have elected to use the RGEES Platform need only address the un-starred requirements.

As noted in our response to question 1.1 above, WTI elected to use the RGEES Platform but, unfortunately, the RGEES Platform was not functioning properly and could not perform the required calculations.

With that said, it merits noting that the school used experienced staff members that were versed in techniques to build cooperation and rapport. The rapport-building techniques included respect for respondents' rights and time, follow-up skills, knowledge of the goals and objectives of the data collection, and knowledge of the uses of the collected data. The goals of the survey, method of data collection, and time commitment were clearly stated by the interviewers interacting with graduates.

We also stressed the importance of using the school's logo, color scheme, and name in conjunction with the RGEES to help increase the response rates. In addition to explaining the importance of the survey to the program, we also made it clear to program graduates that the RGEES is officially sanctioned by both the institution and the Department of Education.

The survey collection staff reviewed the applicable legal constraints and protections on the use and distribution of personally identifiable information (PII). They also received training regarding the confidentiality of the data being collected; their legal responsibility to protect the confidentiality of the data being collected; and, they signed a certification that they would use their best efforts to maintain that confidentiality. To see a summary of school's efforts to

provide training to maintain the confidentiality of personal Identifiable Information (PII) please refer to **Attachment 1.3.4b**.

The respondents were also informed that this information is protected by FERPA and were assured that their individual data, including their employment and earnings data, would be protected from unauthorized disclosure, would be combined with those of other respondents from their program, and would only be reported in the aggregate when, and only if, there are a sufficient number of graduates to protect each respondent's data.

- 3.2: Establish procedures and mechanisms to ensure the information is protected during the production, use, storage, transmittal, and disposition of the survey data in any format (paper survey forms, electronic files, printouts). Ensure that personally identifiable survey data are protected from physical and electronic intrusion (see RGEES Best Practices Guide for a template for your Security Plan).**

The school established procedures and mechanisms to ensure that the information was protected during the production, use, storage, transmittal, and disposition of the survey data in any format (paper, survey forms, electronic files, printouts). These procedures and mechanisms also ensured that personally identifiable survey data are protected from physical and electronic intrusion. (For a detailed summary and confirmation of these procedures, refer to our responses to questions 2.1 through 2.3 above.

- 3.3: The reporting rule in the Gainful Employment Regulations requires 30 cases to report data for a program (Section 668.402). If any additional cross-tabulations are released for external use (e.g., using characteristics of the graduates), any table with a cell with 1 or 2 cases must be recategorized to ensure that each cell in the table has at least 3 cases. This rule applies to counts and to the numerator of any computed rates or percentages, and to the number of cases used to compute an average.**

We are mindful of the reporting rule in the Gainful Employment Regulations requiring a minimum of 30 cases to report data for our program. The relevant cohort for the affected Medical Assistant program consisted of 398 graduates and we received a response from 205 of those graduates. Since we are reporting data from 205 respondents, we have more than satisfied this particular requirement (See **Attachment 3.3**).

Moreover, as confirmed therein, no additional cross-tabulations were released for external use and it contained no table with a cell with 1 or more cases that was required to be recategorized.

#### 4. DATA EDITING

Standard 4:

*Data editing will be used to correct inconsistent data in the RGEES data.*

- 4.1: \*The edits that follow must be used. No additional edits may be used.**

\*This is a starred requirement. The Standards note that schools that have elected to use the RGEES Platform need only address the un-starred requirements.

As noted in our response to question 1.1 above, WTI elected to use the RGEES Platform but, unfortunately, the RGEES Platform was not functioning properly and could not perform the required calculations.

Thus, our responses to the questions propounded below are as follows:

- 1. Negative values for any of the income questions will be replaced with zeroes (i.e., survey items 3a, 3b, 4a, and 5a).**

No negative values were reported or altered.

- 2. When the total income (i.e., sum of survey responses for 3a, 3b, 4a, and 5a) is calculated, values over \$999,999 will be replaced with \$999,999).**

No values over \$999,999 were reported or altered.

- 4.2: \*Code the data set to flag each action taken during editing; also retain the unedited data along with the edited data.**

\*This is a starred requirement. The Standards note that schools that have elected to use the RGEES Platform need only address the un-starred requirements.

As noted in our response to question 1.1 above, WTI elected to use the RGEES Platform but, unfortunately, the RGEES Platform was not functioning properly and could not perform the required calculations.

Nonetheless, the only edits made to data were when income was reported as an hourly or weekly amount. We converted those hourly or weekly amounts into yearly values based on 40 hours per week and 52 weeks per year.

There were 5 such edits: Kimberly Jones, Lori Hanno, Jennifer Perez, Debra Merman, and Bridget Hiltgen. They all provided either an hourly wage or a weekly pay summary. Their respective hourly wage or weekly pay summaries were multiplied to reflect an annual salary.

## 5. CALCULATION OF RESPONSE RATES

Standard 5:

*Surveys must be designed and conducted to achieve the highest practical rates of response to ensure that survey results are representative of the list of recent graduates who received Title IV assistance so that they can be used with confidence to reflect the employment status and earnings of the Title IV-assisted recent graduate cohort. Nonresponse bias analysis must be conducted when response rates or other factors suggest the potential for bias to occur.*

- 5.1: \*A completed survey must include sufficient responses to determine whether the respondent has earnings and to support reporting the respondent's total earnings (including 0 earnings). The RGEES survey will be considered "complete" if the respondent fills out at least one of the earnings items. The survey response is calculated as the ratio of the number of completed surveys (S) to the number of graduates in the cohort (C). Potential respondents that are**

**eligible and not interviewed may include refusals, noncontacts, incomplete responses, or other reasons for nonresponse.**

$$\text{Response Rate} = \text{RR} = \text{S/C}$$

\*This is a starred requirement. The Standards note that schools that have elected to use the RGEES Platform need only address the un-starred requirements.

As noted in our response to question 1.1 above, WTI elected to use the RGEES Platform but, unfortunately, the RGEES Platform was not functioning properly and could not perform the required calculations.

Thus, our responses to the questions propounded below are as follows:

- 1. If cohort members who were excluded from the agreed upon cohort list that the U.S. Department of Education submitted to the Social Security Administration to obtain the cohort earnings data are added, the count of those added cohort members should be added to the number of cases in the cohort (C) and also to the number of completed surveys (S) (see Introduction for a description of extended cases).**

No cohort members were excluded from the agreed cohort list.

- 5.2: As a minimum requirement, at least one half of the recent graduates surveyed for a specific program must submit a completed survey through one or more modes of data collection. That is, the response rate for an individual program must be at least 50 percent for the data to be used to support an appeal under the Gainful Employment Regulations appeal process.**

The school has met this minimum requirement that at least one half of the recent graduates surveyed for a specific program submitted a completed survey through one or more modes of data collection. The affected Medical Assistant program consisted of a cohort of 398 graduates of which 205 or 51% responded.

## **6. NONRESPONSE BIAL ANALYSIS**

### **Standard 6:**

*The potential impact of nonresponse on the quality of information obtained from the survey must be taken into consideration. Nonresponse bias is a serious problem and occurs when there is a correlation between the likelihood of participation in the survey and the responses to the survey variable(s) being measured. Survey estimates may be biased if those who choose to participate (respondents) differ substantially and systematically from those who choose not to participate (nonrespondents). If these differences are related to employment status or earnings, the results from the RGEES may be misleading or even erroneous. The nonresponse bias analysis can indicate the potential impact of nonresponse bias. A nonresponse bias analysis must be conducted if the unit response rate is between 50 percent and 80 percent.*

*Nonresponse bias is assessed by comparing respondents and nonrespondents on information available from graduates' student records. Analysis of recent program level data identified three variables that are readily available in student records and are correlated with earnings: graduates with Pell grants,*

*graduates with a zero expected family contribution, and graduates who are female. A nonresponse bias analysis examines these attributes of the program graduates to determine whether response rates are related to those attributes and/or whether the characteristics of respondents and nonrespondents differ on these characteristics;*

*If excluded cohort members that are not part of the finalized cohort list that the U.S. Department of Education submitted to the Social Security Administration to obtain the cohort earnings data are added to the list of graduates, the student attribute data for those graduates should be included in the data prior to conducting the nonresponse bias analysis. (If the RGEES platform is used, data for those graduates should be added to the RGEES data base. If the RGEES platform is not used, these counts should be included in the nonresponse bias analysis.)*

- 1. The first question in a nonresponse bias analysis is whether the response rates vary across the attributes examined (i.e., do the response rates computed for the group of respondents who received Pell grants differ from those who had a zero expected family contribution, or those who are female)?*
- 2. The second question in a nonresponse bias analysis is whether there are differences between respondents and nonrespondents on the attributes examined – for example, does the percent of responding graduates who received Pell grants differ from the percent of nonresponding graduates who received Pell grants; are there differences between responding and nonresponding graduates in the percentages of graduates with zero expected family contributions; or the percentages who are female).*

**6.1: \*The basic measure of nonresponse bias is the relative bias, that is, the ratio of the bias in an attribute to the percentage of graduates in the cohort with the attribute(s) measured based on data from the graduates' student records. The relative bias must be computed for the percent of graduates who received Pell grants while enrolled, the percent with zero expected family contributions, and the percent female and the average relative bias averaged over these three attributes.**

*\*This is a starred requirement. The Standards note that schools that have elected to use the RGEES Platform need only address the un-starred requirements.*

*As noted in our response to question 1.1 above, WTI elected to use the RGEES Platform but, unfortunately, the RGEES Platform was not functioning properly and could not perform the required calculations.*

*Thus, our response is as follows:*

*With reference to the first question in a nonresponse bias analysis of whether response rates varied across the attributes examined, it bears noting that our response rate was the same across the attributes. We received responses from 205 of the 398 members of the cohort or a response rate of 51.5%.*

*As to the second question in a nonresponse bias analysis of whether there are differences between respondents and nonrespondents on the attributes examined, it also bears noting that there was only a slight difference in the percentages of responders from each of the three attributes but all were under the allowed 10% tolerance.*

With that said, the procedures used in calculating the nonresponsive bias in the 3 required areas (graduates who received Pell grants while enrolled, graduates with a zero expected family contribution, and graduates that were female) were:

1. The first step was determining the response rate. Since our response rate was greater than 50% but less than 80%, we were required to calculate the nonresponse bias.
2. From the completers list with designated responses included for the 3 criteria (graduates who received Pell grants while enrolled, graduates with a zero expected family contribution, and graduates that were female), we manually tabulated the total population for each attribute.
3. The next step was to identify the respondent population and manually count each attribute.
4. After double-checking and confirming the total population and the number of responders, we assumed that all others were nonresponders.
5. With the numbers generated above, we used the **Final Data Set** for nonresponse bias which calculated percentages for both responders and nonresponders, and calculated the percentage differences, then averaged the difference of the outcome to the average nonresponders bias.
6. The NRBA spreadsheet/template has been included as the **Final Data Set Attachment**.

**If excluded cohort members that are not part of the agreed upon cohort list that the U.S. Department of Education submitted to the Social Security Administration to obtain the cohort earnings data are added to the cohort, they must be added to the data collection data base before the final nonresponsive bias analysis is conducted (see introduction for a description of the excluded cases).**

There were no excluded cohort members

**\*The nonresponse bias analysis must be conducted both with and without the excluded cases. The relative bias must be calculated as follows:**

\*This is a starred requirement. The Standards note that schools that have elected to use the RGEES Platform need only address the un-starred requirements.

As noted in our response to question 1.1 above, WTI elected to use the RGEES Platform but, unfortunately, the RGEES Platform was not functioning properly and could not perform the required calculations.

Nonetheless, in response to this question please refer to our response to question 6.1 immediately above.

1. **An estimate of the bias due to nonresponse for each of the three attributes examined can be computed as the product of the nonresponse rate and the difference between respondents and nonrespondents. An estimate of the bias for each of the three attributes examined is given by:**

$$B(YNR) = YR - Y_T = (NNR / N) (YR - YNR)$$

Where:

$\bar{Y}_T$  = the percent based on all cases;

$\bar{Y}_R$  = the percent based only on respondent cases;

$\bar{Y}_{NR}$  = the percent based only on the nonrespondent cases;

N = the total number of cases; and

NNR = the number of nonrespondent cases.

The estimated bias for each attributes as figured using the Final Data Set are as follows:

The estimated bias for each attributes as figured using the Final Data Set are as follows:

Graduates with Pell grants	.21
Graduates with zero expected family contributions	-5.25
Graduates that are female	.89

2. An estimate of the relative bias is then computed as the ration of the bias due to nonresponse to the actual value derived from the student records.

$$RelB(\bar{Y}_{NR}) = B(\bar{Y}_{NR}) / \bar{Y}_T$$

The relative bias for each attribute as figured using the Final Data Set are as follows:

Graduates with Pell grants	.22
Graduates with zero expected family contributions	7.39
Graduates that are female	.94

3. The average relative bias due to nonresponse, computed as the average of the absolute value of the relative bias due to nonresponse measured for each of the three attributes examined, is used to measure the relative bias due to nonresponse present in of the RGEES data.

$$\text{Average RelB}(\bar{Y}_{NR}) = (|B(\bar{Y}_{1NR}) / \bar{Y}_{1T}| + |B(\bar{Y}_{2NR}) / \bar{Y}_{2T}| + |B(\bar{Y}_{3NR}) / \bar{Y}_{3T}|) / 3$$

The average relative bias is 2.85 as figured using the Final Data Set which was below the tolerable bias of 10%.

6.2: \*In the case of nonresponse to the RGEES, the following decision rule applies:

As a minimum requirement, the average relative bias due to nonresponse (equation 6.1.3) in the data for recent graduates surveyed for a specific program must not exceed 10 percent. That is, the average relative bias computed over the percent of graduates who received a Pell grant, the percent with zero expected family contribution, and the percent female within an



**individual program must not exceed 10 percent in order for the earnings data from RGEES to be used to support an appeal under the Gainful Employment Regulations appeal process.**

\*This is a starred requirement. The Standards note that schools that have elected to use the RGEES Platform need only address the un-starred requirements.

As noted in our response to question 1.1 above, WTI elected to use the RGEES Platform but, unfortunately, the RGEES Platform was not functioning properly and could not perform the required calculations.

Nonetheless, in response to this question, please refer to our response to 6.1 immediately above.

## 7. CALCULATING THE MEAN AND MEDIAN

Standard 7:

*Established procedures must be used to compute the mean and median of the earnings data collected using RGEES.*

**7.1: \*The mean is the average, computed as the sum of all earnings across graduates who responded to the survey divided by the number of graduates who responded to the survey. Nonrespondents must be excluded from the computation, but respondents who reported zero (\$0) earnings must be included in the computation. (The mean will be calculated automatically by the RGEES platform. If the RGEES platform is not used, the mean must be computed as described here.)**

\*This is a starred requirement. The Standards note that schools that have elected to use the RGEES Platform need only address the un-starred requirements.

As noted in our response to question 1.1 above, WTI elected to use the RGEES Platform but, unfortunately, the RGEES Platform was not functioning properly and could not perform the required calculations.

Nonetheless, our response to this question is as follows:

The procedures used in calculating the Mean and Median were:

1. From the survey responses received, we first generated a list of all responders in Excel spread sheet. The earnings figure we used combined responses to questions 4 through 8 of the survey. If information came in a form where we could make a reasonable assumption as to the responders' intent, we calculated the amounts (i.e., such as recent graduate responders providing income information as a full-time hourly or weekly rate and converting that hourly or weekly rate to an annual salary) otherwise we used amounts exactly as provided.
2. Once the Excel summary sheet was completed, we totaled all responders' earnings together. It was then divided by the number of responders to arrive at a mean amount.

3. In order to get the median, we used the sort function in Excel and ranked the earnings from lowest to highest. As our responder list consisted of 205 responders, the median number was 103.
4. After completing all of this, we imported the responders and earnings numbers into the NRBA template which determined the mean and median.

Thus, using the **Final Data Set**, the calculated mean is \$17,931.

**7.2: \*The median is the midpoint of the distribution of all reported earnings, including zero (\$0). One half of the respondents with earnings reported (including zeros (\$)) are above the median and one half are below the median. (The median will be calculated automatically by the RGEES platform. If the RGEES platform is not used, the median must be computed as described here.)**

1. **Order the respondents' earnings from the lowest (\$0) to the highest (\$999,999). (If multiple graduates have equal amounts of total income, enter the amount once for each graduate with that amount of income.)**
2. **Identify the middlemost earnings value which is the median earnings value. If the number of respondents is even, there is no one middle value. In this instance, the median is computed as the mean of the two earnings values closest to the middle.**

\*This is a starred requirement. The Standards note that schools that have elected to use the RGEES Platform need only address the un-starred requirements.

As noted in our response to question 1.1 above, WTI elected to use the RGEES Platform but, unfortunately, the RGEES Platform was not functioning properly and could not perform the required calculations.

Nonetheless, in response to this question, it bears noting that after arranging the earnings from lowest to highest for all 205 responders, it was determined that 103 on the list was the median. The earnings for this responder is \$19,000.

## 8. DOCUMENTING A SURVEY SYSTEM

Standard 8:

*Complete documentation must be developed for each program that uses the RGEES in an appeal of the program's graduates' earnings under the Gainful Employment Regulations. Documentation includes those materials necessary to replicate and evaluate each survey.*

**8.1: \*Survey documentation must, at a minimum, include the elements that follow:**

\*This is a starred requirement. The Standards note that schools that have elected to use the RGEES Platform need only address the un-starred requirements.

As noted in our response to question 1.1 above, WTI elected to use the RGEES Platform but, unfortunately, the RGEES Platform was not functioning properly and could not perform the required calculations.

Nonetheless, our responses to the questions below are as follows:

**1. Final data set(s), final instrument(s) or a facsimile thereof;**

See the **Final Data Set Attachment**

**2. Definitions of all variables, including coding;**

The only variables used in the final data set were the original cohort listing of 398 cohort Medical Assistant graduates reflecting the respective number of graduates who received Pell grants, the number of graduates with a zero expected family contribution, and the number of graduates who were female (1 = yes, and 2 = no).

**3. Data file layout;**

Data file layout is defined by the column header, with the only exception being the respective number of graduates who receive Pell grants, the number of graduates with a zero expected family contribution, and the number of graduates who were female, referenced in the response to question 8.1.2 immediately above.

**4. Descriptions of constructed variable on the data file that are computed from responses to other variable on the file;**

No constructed variables were used in the data files to produce other variables.

**5. List of variable that could be used (alone or in combination) to uniquely identify an individual graduate in the data line;**

First and last name have been utilized to uniquely identify each graduate in the data line.

**6. List of all edits applied to the data;**

There were 5 such edits: Kimberly Jones, Lori Hanno, Jennifer Perez, Debra Merman, and Bridget Hiltgen, all provided either an hourly wage or a weekly pay summary. Their respective hourly wage or weekly pay was multiplied to reflect an annual salary.

**7. Frequency counts of all survey items, including counts of the number missing.**

The cohort consisted of 398 graduates and 205 of those graduates responded.

**8.2: If the data will be used for any purpose other than the appeal under the Gainful Employment Regulations, the documentation must also include the elements that follow:**

**1. General description of disclosure avoidance techniques and**

**2. Descriptions of restrictions on the use of data (e.g., limited to statistical uses; when using restricted data files, all unweighted counts included in any release must be rounded).**

The school will not use the data for any other purpose other than the appeal under the Gainful Employment Regulations.

**8.3.1 \*System documentation must include the elements that follow. If using the RGEES Platform, and any alternative modes are used, 1 and 2 should be modified to include relevant information for modes other than the web collection.**

\*This is a starred requirement. The Standards note that schools that have elected to use the RGEES Platform need only address the un-starred requirements.

As noted in our response to question 1.1 above, WTI elected to use the RGEES Platform but, unfortunately, the RGEES Platform was not functioning properly and could not perform the required calculations.

Nonetheless, our responses to the questions below are as follows:

**1. All instructions to respondents and interviewers about how to properly respond to a survey item or about how to properly present a survey item;**

The survey was distributed through SurveyMonkey and used the same exact survey questions with the directions specified on Appendix B: The Survey, pages 48 through 50 of the Best Practices Guide (see **Attachment 8.3.1**).

**2. Description of the data collection methodology;**

Our primary source of data collection utilized SurveyMonkey to distribute the surveys through email. We also paid to upgrade our SurveyMonkey account to platinum in order to take advantage of the HTTPS features and CSV upload capability provided by the platinum plan. First and last names along with email addresses were entered into a CSV or exchange file. The file was then uploaded each time we sent out an email. SurveyMonkey converted each line in the spreadsheet into a unique email with each individual's first name listed on the email and their first and last name listed on the first question of the survey. Each person also had to attest to their identity, as specified in the Best Practices Guide. Furthermore, if requested, we can readily replicate a similar experience to that of the cohort graduates by simply sending an identical sample email demonstrating the personalization and use of HTTPS as was utilized in our electronic data collection.

**3. Data editing plan specifications (see Standard 4 and the RGEES Best Practice Guide);**

The only edits to data occurred when income was reported as an hourly or weekly amount. We converted those hourly or weekly amounts into yearly values based on 40 hours per week and 52 weeks a year. See question 8.1.5 for specific examples.

**4. Data processing plan specifications and justifications for why they were implemented;**

We planned to utilize the RGEES Platform for this purpose but, as previously noted and documented, the RGEES Platform was not functioning properly and could not perform the required calculations. The mean/median reports would not calculate any of the our proxy

surveys. The RGEES Platform automatically put these surveys into the base cohort and would not process reports for anything other than the adjusted vetted cohort; and, we were also having this issue with the non-bias reports. As a consequence, we were forced to process the data manually. Response rates, mean/median values, and nonresponse bias were calculated in Excel with the template provided by the Department of Education (refer to the **Final Data Set Attachment**).

**5. Response rates; and**

See our response to question 8.4 immediately above.

**6. Nonresponse bias analysis, if applicable.**

See our response to question 8.4 immediately above.



### Chief Executive Officer's Certification

With his signature below, James Barry Mannion attests and hereby asserts that he is the president and chief executive officer of Wichita Technical Institute, and that:

1. The RGEES Survey was conducted in accordance with the Survey Standards for Conducting the Recent Graduates Employment and Earnings Survey; and
2. The alternative means or median earnings used to recalculate the relevant programs Debt to Earnings rates were accurately determined from the survey results.

Signed and dated this 23 day of FEBRUARY, 2017.

(b)(6)

James Barry Mannion, President & CEO  
Wichita Technical Institute

Wichita Technical Institute (Main)  
2051 S. Meridian  
Wichita, KS 67213  
(316) 943-2241  
Fax: (316) 943-5438

WTI East Campus (Branch)  
6130 E. Central  
Wichita, KS 67208  
(316) 260-1030  
Fax: (316) 260-8043

WTI Topeka Campus (Branch)  
3712 SW Burlingame  
Topeka, KS 66609  
(785) 354-4568  
Fax: (785) 354-4541

WTI Joplin Campus (Branch)  
1715 N Range Line Rd.  
Joplin, MO 64801  
(417) 206-9115  
Fax: (417) 206-9124

WTI Tulsa Campus (Branch)  
8421 E. 61st St., Suite U  
Tulsa, OK 74133  
(918) 292-8166  
Fax: (918) 794-4581

**INDEPENDENT AUDITOR'S REPORT**

To the Board of Directors,  
Wichita Technical Institute

We have examined Wichita Technical Institute's ("WTI") compliance with the requirements set forth in the *Standards for Conducting the Recent Graduates Employment and Earnings Survey* promulgated by the United States Department of Education (Exhibit I). Management of WTI is responsible for WTI's compliance with those requirements. Our responsibility is to express an opinion on WTI's compliance with the specified requirements based on our examination.

Our examination was conducted in accordance with *Government Auditing Standards*, issued by the Comptroller General of the United States and attestation standards established by the American Institute of Certified Public Accountants. Those standards require that we plan and perform the examination to obtain reasonable assurance about whether WTI complied, in all material respects, with the specified requirements referenced above. An examination involves performing procedures to obtain evidence about whether WTI complied with the specified requirements. The nature, timing, and extent of the procedures selected depend on our judgment, including an assessment of the risks of material noncompliance, whether due to fraud or error. We believe that the evidence we obtained is sufficient and appropriate to provide a reasonable basis for our opinion. Our examination does not provide a legal determination on WTI's compliance with specified requirements.

In our opinion, WTI complied, in all material respects, with the *Standards for Conducting the Recent Graduates Employment and Earnings Survey* (Exhibit I).

This report is intended solely for the information and use of management and the U.S. Department of Education and is not intended to be and should not be used by anyone other than these specified parties.

*West & Company*

March 4, 2017

STANDARDS FOR CONDUCTING THE RECENT  
GRADUATES EMPLOYMENT AND EARNINGS SURVEY

Standard 1 - Planning Your Data Collection

Standard 2 - Data Collection Methodology

Standard 3 - Maintaining Confidentiality

Standard 4 - Data Editing

Standard 5 - Calculation of Response Rates

Standard 6 - Nonresponse Bias Analysis

Standard 7 - Calculating the Mean and Median

Standard 8 - Documenting a Survey System



WICHITA TECHNICAL INSTITUTE  
2051 S. MERIDIAN  
WICHITA, KS 672131927

CODE: 1050300

GAINFUL EMPLOYMENT DEBT MEASURES-ALTERNATIVE EARNINGS

CALC YEAR	CIP Code	CIP Program name	cred level	Debt to earnings annual	debt to earings discretionary	transitional Debt to earnings annual	transitional debt to earings discretionary
2015	510801	Medical/Clinical Assistant	1	11.99	169.37	11.99	169.37

**From:** AltEarningsAppeals  
**Sent:** 10 Oct 2017 17:19:24 +0000  
**To:** Jim Moored;AltEarningsAppeals  
**Subject:** RE: Notice of Intent to File Alternate Earings Appeal

Good Afternoon Jim Moored,

This message confirms that your Notice of Intent to file an Alternate Earnings Appeal email was received on October 5, 2017. The e-mail has not yet been reviewed for completeness or content, but your message has been successfully transmitted.

Thank You,

Alternate Earnings Appeals  
Gainful Employment Operations  
Operations Performance Division  
Business Operations



**From:** Jim Moored [mailto:jmoored@mooredbeautyschools.com]  
**Sent:** Thursday, October 05, 2017 3:52 PM  
**To:** AltEarningsAppeals  
**Subject:** Notice of Intent to File Alternate Earings Appeal

Please note that Twin City Beauty College OPEID #030752-00 and its' three campuses; Traverse City Beauty College College OPEID #030752-01; Michiana Beauty College OPEID #030752-02 and Tulip City Beauty College OPEID #030752-03 are requesting the option of potentially providing alternative earnings data following the publication of our draft D/E rates.

All four (4) locations offer a diploma degree program under the CIP Code - 12.0413, and are entitled Cosmetology & Cosmetology Instructor programs.

Sincerely,

James F. Moored, owner

**From:** AltEarningsAppeals  
**Sent:** 5 Oct 2017 15:51:42 +0000  
**To:** Gail Miner;AltEarningsAppeals  
**Cc:** lancasterbeautyschool@hotmail.com  
**Subject:** RE: Notice of Intent to File Alternate Earning Appeal

Good Afternoon Gail Milner,

This message confirms that your Notice of Intent to file an Alternate Earnings Appeal email was received on October 4, 2017. The e-mail has not yet been reviewed for completeness or content, but your message has been successfully transmitted.

Thank You,

Alternate Earnings Appeals  
Gainful Employment Operations  
Operations Performance Division  
Business Operations



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**From:** Gail Miner [mailto:Gail@lancasterbeautyschool.com]  
**Sent:** Wednesday, October 04, 2017 5:20 PM  
**To:** AltEarningsAppeals  
**Cc:** lancasterbeautyschool@hotmail.com  
**Subject:** Notice of Intent to File Alternate Earning Appeal

Institutions Name: Lancaster Beauty School  
Institutions OPEID: 013010

To Whom It May Concern:

October 4<sup>th</sup>, 2017,

Our institution would like to file an Alternative Earnings Appeal. The institutions name is Lancaster Beauty School, OPEID number is 013010, the CIP code for the program is 12.0401 Cosmetology and the credential level is 01-Undergraduate Certificate.

If you have any additional questions please contact me at 661-948-1672.

Thank you,  
Virginia Gail Miner  
President

**From:** AltEarningsAppeals  
**Sent:** 24 Aug 2017 19:40:03 +0000  
**To:** Angela McLane;AltEarningsAppeals  
**Subject:** RE: Notice of Intent to file Alternate Earning Appeal

Good Afternoon,

This message confirms that your Gainful Employment Notice of Intent to Appeal email was received on August 24, 2017. The contents have not yet been reviewed for completeness or content, but your message was successfully transmitted.

Thank you,

Alternate Earnings Appeals  
Gainful Employment Operations

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**From:** Angela McLane [mailto:amclane@educatorsofbeauty.com]  
**Sent:** Thursday, August 24, 2017 3:03 PM  
**To:** AltEarningsAppeals  
**Subject:** Notice of Intent to file Alternate Earning Appeal

Please add us to the list for the Notice of Intent to file Alternate Earning Appeal for Educators of Beauty

The OPEID # for Educators of Beauty in Sterling is 008259-00, Educators of Beauty in Rockford is 008259-01 and for our Educators of Beauty in Peru- is 009475-00. The Credential level for each program is 01 CIP code of 120401, and 120413.

Thank you,

*Angela McLane*

Director of Accounting  
Modern Beauty Companies Inc.  
dba Educators of Beauty College of Cosmetology - Sterling  
A Pivot Point Member School  
[amclane@educatorsofbeauty.com](mailto:amclane@educatorsofbeauty.com)  
1-815-625-0247

\*Like us on Facebook\*

\*Pin us on Pinterest\*

**From:** AltEarningsAppeals  
**Sent:** 10 Oct 2017 18:03:30 +0000  
**To:** Carol Garrett;AltEarningsAppeals  
**Subject:** RE: Notice of Intent to File Alternate Earning Appeal

Good Afternoon Carol Garrett,

This message confirms that your Notice of Intent to file an Alternate Earnings Appeal email was received on October 5, 2017. The e-mail has not yet been reviewed for completeness or content, but your message has been successfully transmitted.

Thank You,

Alternate Earnings Appeals  
Gainful Employment Operations  
Operations Performance Division  
Business Operations



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**From:** Carol Garrett [mailto:carol.garrett@ahdvegas.com]  
**Sent:** Thursday, October 05, 2017 4:46 PM  
**To:** AltEarningsAppeals  
**Subject:** Notice of Intent to File Alternate Earning Appeal

The Academy of Hair Design is submitting this as the official notice to appeal.

Our OPEID number is 013232

The program we will be appealing is the Cosmetology program.

The CIP code is 12.0401

If you have any questions, please contact me

Thank you for your time in this matter.

CAROL GARRETT  
MANAGER / FINANCIAL AID DIRECTOR  
Academy of Hair Design  
5191 W. Charleston Blvd. #150  
Las Vegas, NV 89146  
T. 702.878.1185 x.26  
F. 702.878.7289  
[www.ahdvegas.com](http://www.ahdvegas.com)

**From:** Arthur, Jeff  
**Sent:** 28 Dec 2016 19:57:10 +0000  
**To:** AltEarningsAppeals  
**Subject:** Re: Notice of Intent to File Alternate Earnings Appeal: ECPI University 010198

I wanted to confirm this was received to ensure programs are noted as being appealed in the upcoming release of rates.

thank you.

---

**From:** Jeff Arthur <Arthur@ecpi.edu>  
**Date:** Friday, December 16, 2016 at 12:27 PM  
**To:** "AltEarningsAppeals@ed.gov" <AltEarningsAppeals@ed.gov>  
**Cc:** Jeff Arthur <Arthur@ecpi.edu>  
**Subject:** Notice of Intent to File Alternate Earnings Appeal

ECPI University – 010198, intends to submit alternate earnings appeal for the following programs:

CIP:	12.0503	Cred Lvl:	02
CIP:	51.3501	Cred Lvl:	02
CIP:	51.0601	Cred Lvl:	02
CIP:	51.0801	Cred Lvl:	02

Please confirm receipt of this intent.

Thank you,

**Jeff Arthur**

Vice President of Regulatory Affairs and Chief Information Officer

**ECPI University** | 5555 Greenwich Road | Virginia Beach, VA 23462  
(Phone) 757-213-3505 x55311 | Arthur@ecpi.edu | [www.ecpi.edu](http://www.ecpi.edu)

**From:** AltEarningsAppeals  
**Sent:** 11 Oct 2017 12:53:48 +0000  
**To:** Arthur, Jeff;AltEarningsAppeals  
**Subject:** RE: Notice of Intent to File Alternate Earnings Appeal - ECPI University 010198

Good Afternoon Jeff Arthur,

This message confirms that your Notice of Intent to file an Alternate Earnings Appeal email was received on October 6, 2017. The e-mail has not yet been reviewed for completeness or content, but your message has been successfully transmitted.

Thank You,

Alternate Earnings Appeals  
Gainful Employment Operations  
Operations Performance Division  
Business Operations



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**From:** Arthur, Jeff [mailto:Arthur@ecpi.edu]  
**Sent:** Friday, October 06, 2017 10:19 AM  
**To:** AltEarningsAppeals  
**Cc:** Arthur, Jeff  
**Subject:** Notice of Intent to File Alternate Earnings Appeal - ECPI University 010198

ECPI University - 010198  
Intends to file an earnings appeal for GE programs noted below:

CIP - Level

51.0801 - Associate Degree  
51.0601 - Associate Degree

Thank you,

Jeff Arthur  
VP Regulatory Affairs  
ECPI University

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**From:** AltEarningsAppeals  
**Sent:** 3 Oct 2017 19:34:22 +0000  
**To:** Martha Poulos;AltEarningsAppeals  
**Subject:** RE: Notice of Intent to File Alternate Earnings Appeal - Flint Institute of Barbering, Inc.

Good Morning Martha Poulos,

This message confirms that your Notice of Intent to file an Alternate Earnings Appeal email was received on October 3, 2017. The contents have not yet been reviewed for completeness or content, but your message has been successfully transmitted.

Thank you,

Alternate Earnings Appeals  
Gainful Employment Operations  
Operations Performance Division  
Business Operations



**From:** Martha Poulos [mailto:marthapoulos@aol.com]  
**Sent:** Tuesday, October 03, 2017 3:13 PM  
**To:** AltEarningsAppeals  
**Subject:** Notice of Intent to File Alternate Earnings Appeal - Flint Institute of Barbering, Inc.

U.S. Department of Education / Gainful Employment appeals,

Please let this serve as a "Notice of Intent to File Alternate Earnings Appeal" for the Flint Institute of Barbering, Inc. for 2016 Gainful Employment Rate - Debt Measure year (DMYR) 2015.

FLINT INSTITUTE OF BARBERING, INC.  
3214 FLUSHING ROAD  
FLINT MI 48504

OPEID # 011098  
PROGRAM: BARBERING/BARBER  
CIP CODE FOR BARBERING 120402  
CREDENTIAL LEVEL FOR BARBERING 01

If you have any questions or need additional information, please feel free to contact me. (810) 232-4711

Sincerely,  
Martha A. Poulos / President



**From:** AltEarningsAppeals  
**Sent:** 19 Jan 2017 19:07:07 +0000  
**To:** Ryan Claybaugh;AltEarningsAppeals  
**Subject:** RE: Notice of Intent to File Alternate Earnings Appeal - OPEID 025318

Hello Ryan,  
That list was compiled as of 12/30/16. Your program's Notice of Intent was logged earlier this month and will be included on the next and final list which is scheduled to post sometime next week.

Alternate Earnings Appeals  
Gainful Employment Operations  
Operations Performance Management Services  
Business Operations



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**From:** Ryan Claybaugh [mailto:ryanc@paulmitchell.edu]  
**Sent:** Thursday, January 19, 2017 1:59 PM  
**To:** AltEarningsAppeals  
**Subject:** FW: Notice of Intent to File Alternate Earnings Appeal - OPEID 025318

Hi,

I checked the spreadsheet on the GE page from StudentAid.gov and did not see our school listed as one that is appealing. I am resending just to be sure. Thanks

--Ryan

---

**From:** Ryan Claybaugh [mailto:ryanc@paulmitchell.edu]  
**Sent:** Wednesday, January 04, 2017 4:55 PM  
**To:** AltEarningsAppeals@ed.gov  
**Subject:** Notice of Intent to File Alternate Earnings Appeal - OPEID 025318

Dear FSA:

In accordance with the instructions set out in *Gainful Employment Electronic Announcement #95 - Debt-to-Earnings Rate Alternate Earnings Appeals, Paul Mitchell The School, OPEID 025318*, hereby notifies the Department of its intent to file an Alternate Earnings Appeal for the following program:

CIP Code	Credential Level	Program Name
12.0401	Certificate/Diploma	Cosmetology

**We respectfully request that the Department confirm that this email has been received and that this Notice of Appeal has been accepted.**

If you have any questions, please do not hesitate to contact me at this email address, or by telephone at 801-302-8801 ext 1021.

Sincerely,

**Ryan Claybaugh** | Paul Mitchell Schools  
O: 801.302.8801 x 1021 | M: 801.440.0078  
[www.paulmitchell.edu](http://www.paulmitchell.edu)  
To send me files securely, click [here](#).

**From:** AltEarningsAppeals  
**Sent:** 26 Sep 2017 14:23:23 +0000  
**To:** David;AltEarningsAppeals  
**Cc:** 'Linda Karas'  
**Subject:** RE: Notice of Intent to File Alternate Earnings Appeal - Robert Fiance Beauty Schools

Good Morning Mr. Fiance,

This message confirms that your Gainful Employment alternate earnings Notice of Intent to Appeal email was received on September 25th , 2017. The contents have not yet been reviewed for completeness or content, but your message has been successfully transmitted.

Thank You,

Alternate Earnings Appeals

Gainful Employment Operations

Operations Performance Management Services

Business Operations



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**From:** David [mailto:David@robertfiance.edu]  
**Sent:** Monday, September 25, 2017 9:58 AM  
**To:** AltEarningsAppeals  
**Cc:** 'Linda Karas'  
**Subject:** Notice of Intent to File Alternate Earnings Appeal - Robert Fiance Beauty Schools

Please note that Robert Fiance Beauty Schools will file an alternate earnings appeal for the following program:

IPEDS	Institution Name	Institution Type and Control	CIP Code	Credential Level Code	Credential Level	CIP Code Program Name	D/F Rate (Zone)	Campus City, State
025/202	ROBERT FIANCE BEAUTY SCHOOLS	PROPRIETARY LESS THAN 2 YEARS	120401	01	Undergraduate Certificate or Diploma Program	Cosmetology/Cosmetologists, General	R2/7%	NORTH PLAINFIELD, NJ

Thank you,

David Yurman

Compliance Coordinator

Robert Fiance Beauty Schools

732-442-6007, ext. 33

**From:** AltEarningsAppeals  
**Sent:** 26 Sep 2017 14:24:46 +0000  
**To:** David;AltEarningsAppeals  
**Cc:** 'Linda Karas'  
**Subject:** RE: Notice of Intent to File Alternate Earnings Appeal - Robert Fiance Beauty Schools

Good Morning Mr. Fiance,

This message confirms that your Gainful Employment alternate earnings Notice of Intent to Appeal email was received on September 25th , 2017. The contents have not yet been reviewed for completeness or content, but your message has been successfully transmitted.

Thank You,

Alternate Earnings Appeals  
Gainful Employment Operations  
Operations Performance Management Services  
Business Operations

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**From:** David [mailto:David@robertfiance.edu]  
**Sent:** Monday, September 25, 2017 10:03 AM  
**To:** AltEarningsAppeals  
**Cc:** 'Linda Karas'  
**Subject:** Notice of Intent to File Alternate Earnings Appeal - Robert Fiance Beauty Schools

Please note that Robert Fiance Beauty Schools will file an alternate earnings appeal for the following program:

CFPEID	Institution Name	Institution Type and Control	CIP Code	Credential Level Code	Credential Level	CIP Code Program Name	D/F Rate (Rate)	Campus City, State
022237	ROBERT FIANCE BEAUTY SCHOOLS	PROPRIETARY (LESS THAN 2 YEARS)	120401	01	Undergraduate Certificate or Diploma Program	Cosmetology/Cosmetologists, General	9.34%	W151 NEW YORK, NJ

Thank you,

David Yurman

Compliance Coordinator

Robert Fiance Beauty Schools

732-442-6007, ext. 33

**From:** Gregory Mathews  
**Sent:** 11 Jan 2017 17:52:58 +0000  
**To:** AltEarningsAppeals  
**Cc:** FAS Compliance Team (compliance@fasinc.net); Susan Haise; Melanie Strenk; Kari Kennedy  
**Subject:** RE: Notice of Intent to File Alternate Earnings Appeal - The Institute of Beauty and Wellness - OPE ID 038083

I am e-mailing again to notify the U.S. Department of Education that that the Institute of Beauty and Wellness, 327 East Saint Paul Avenue, Milwaukee, WI 53202 intends to submit an Alternate Earnings Appeal.

Institution's Name: The Institute of Beauty and Wellness  
OPEID: 038083  
CIP Code and Credential Level: 120401-01  
Program: Cosmetology

Please let me know if there is anything else needed for this intention.

Gregory Mathews  
Financial Aid Administrator  
The Institute of Beauty and Wellness

---





**From:** Gregory Mathews  
**Sent:** Tuesday, November 08, 2016 1:15 PM  
**To:** 'AltEarningsAppeals@ed.gov'  
**Cc:** FAS Compliance Team (compliance@fasinc.net); Susan Haise (susan@nerolispa.com); Melanie Strenk; Kari Kennedy  
**Subject:** Notice of Intent to File Alternate Earnings Appeal - The Institute of Beauty and Wellness - OPE ID 038083

This e-mail serves to notify the U.S. Department of Education that the Institute of Beauty and Wellness, 327 East Saint Paul Avenue, Milwaukee, WI 53202 intends to submit an Alternate Earnings Appeal.

Institution's Name: The Institute of Beauty and Wellness  
OPEID: 038083  
CIP Code and Credential Level: 120401-01  
Program: Cosmetology

Please let me know if there is anything else needed for this intention.

**Gregory Mathews**  
*Financial Aid Administrator*  
p: 414.319.7581  
f: 414.319.7528

THE INSTITUTE OF BEAUTY AND WELLNESS      
327 East St. Paul Avenue, Milwaukee, WI 53202 | 414.227.2889 | [ibw.edu](http://ibw.edu)

AVEDA INSTITUTE MADISON    

353 East Campus Mall, Madison, WI 53715 | 608.250.3100 | [aimadison.com](http://aimadison.com)

Please consider the environment before printing this email



**From:** AltEarningsAppeals  
**Sent:** 27 Apr 2017 15:41:00 +0000  
**To:** Gregory Mathews  
**Cc:** AltEarningsAppeals  
**Subject:** RE: Notice of Intent to File Alternate Earnings Appeal - The Institute of Beauty and Wellness - OPE ID 038083

Good Morning Mr. Mathews,

This message confirms that your Gainful Employment alternate earnings appeal package email was received on March 3<sup>rd</sup>, 2017. The contents have not yet been reviewed for completeness or content, but your message and at least one attachment were successfully transmitted.

Thank You,

Alternate Earnings Appeals  
Gainful Employment Operations  
Operations Performance Management Services  
Business Operations



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**From:** Gregory Mathews [mailto:gregory@ibw.edu]  
**Sent:** Tuesday, November 08, 2016 2:13 PM  
**To:** AltEarningsAppeals  
**Cc:** FAS Compliance Team (complianceteam@fasinc.net); Susan Haise; Melanie Strenk; Kari Kennedy  
**Subject:** Notice of Intent to File Alternate Earnings Appeal - The Institute of Beauty and Wellness - OPE ID 038083

This e-mail serves to notify the U.S. Department of Education that the Institute of Beauty and Wellness, 327 East Saint Paul Avenue, Milwaukee, WI 53202 intends to submit an Alternate Earnings Appeal.

Institution's Name: The Institute of Beauty and Wellness  
OPEID: 038083  
CIP Code and Credential Level: 120401-01  
Program: Cosmetology

Please let me know if there is anything else needed for this intention.

**Gregory Mathews**  
*Financial Aid Administrator*  
p: 414.319.7581  
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353 East Campus Mall, Madison, WI 53715 | 608.250.3100 | [aimadison.com](http://aimadison.com)

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**From:** Andre Moreau  
**Sent:** 18 Jan 2017 09:21:01 -0600  
**To:** AltEarningsAppeals  
**Subject:** RE: Notice of Intent to File Alternate Earnings Appeal

When you say on an official .edu email account, are you referring to the email account that is on file for our particular organization which in our case should be cosmet@bellsouth.net?

*Andre' Moreau  
Cosmetology Training Center  
5520 Johnston Street, Suite H2  
Lafayette, LA 70503*

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**From:** AltEarningsAppeals [mailto:AltEarningsAppeals@ed.gov]  
**Sent:** Wednesday, January 18, 2017 9:09 AM  
**To:** Andre Moreau; AltEarningsAppeals  
**Subject:** RE: Notice of Intent to File Alternate Earnings Appeal

Hello Andre Moreau,  
Federal Student Aid confirms receipt of this e-mail. However, before we can provide confirmation that your Notice of Intent to File and Alternate Earnings Appeal has been accepted, we have a request. Typically, we require official business to be conducted on school letterhead and/or from an official .edu e-mail account. Yours is done on neither. Can you please resend this Notice of Intent meeting one or both of those thresholds?

Alternate Earnings Appeals  
Gainful Employment Operations  
Operations Performance Management Services  
Business Operations

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

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**From:** Andre Moreau [mailto:andremoreau21@gmail.com]  
**Sent:** Tuesday, January 17, 2017 12:03 PM  
**To:** AltEarningsAppeals  
**Subject:** Notice of Intent to File Alternate Earnings Appeal

Please be advised that the Cosmetology Training Center located in Lafayette Louisiana would like to file an alternate Earnings appeal for its "zone" rating it received for the General Cosmetology Program.

Cosmetology Training Center  
OPEID: 025485  
CIP code: 120401

Credential level: 01

***Andre' Moreau***  
***Cosmetology Training Center***  
***5520 Johnston Street, Suite H2***  
***Lafayette, LA 70503***  
***(337)237-6868***

**From:** AltEarningsAppeals  
**Sent:** 11 Oct 2017 17:16:03 +0000  
**To:** Hooman Safavi;AltEarningsAppeals  
**Cc:** Rey Vasquez-Solis;Rosemary Safavi  
**Subject:** RE: Notice of Intent to File Alternate Earnings Appeal

Good Afternoon Hooman Safavi,

This message confirms that your Notice of Intent to file an Alternate Earnings Appeal email was received on October 6, 2017. The e-mail has not yet been reviewed for completeness or content, but your message has been successfully transmitted.

Thank You,

Alternate Earnings Appeals  
Gainful Employment Operations  
Operations Performance Division  
Business Operations



**From:** Hooman Safavi [mailto:hoomans@modesto.paulmitchell.edu]  
**Sent:** Friday, October 06, 2017 6:35 PM  
**To:** AltEarningsAppeals  
**Cc:** Rey Vasquez-Solis; Rosemary Safavi  
**Subject:** Notice of Intent to File Alternate Earnings Appeal

Dear FSA:

In accordance with the instructions set out in *Gainful Employment Electronic Announcement #95 - Debt-to-Earnings Rate Alternate Earnings Appeals, Paul Mitchell The School Modesto*, OPEID 04162800, hereby notifies the Department of its intent to file an Alternate Earnings Appeal for the following programs:

CIP Code	Credential Level	Program Name
12.0401	Certificate	Cosmetology
12.0402	Certificate	Barbering
12.0410	Certificate	Manicuring
12.0409	Certificate	Esthetics

**We respectfully request that the Department confirm that this email has been received and that this Notice of Appeal has been accepted.**

If you have any questions, please do not hesitate to contact me at this email address, or by telephone at 209-577-0644.

Sincerely,