



The Career College Information Source

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April 2014 • Section 1

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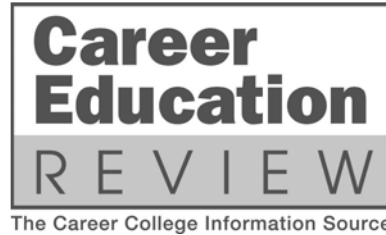
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*Interview with Robert Herzog, APSCU Board of Directors and Berkeley College*

### **APSCU GREAT Award Winners Are Shining Examples of Private Sector Institutions' Good Work**

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# Career Education REVIEW

The Career College Information Source



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Brodie



Walker

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## *Letter from the Editor*

For as long as I can remember I have loved reading. When I was young, it was a way for me to discover and learn about life outside of Green Bay, Wisconsin. However, it wasn't until my senior year in college that I was introduced to the publishing world. As an intern with Voyageur Magazine, a northeast Wisconsin historical magazine, I experienced every aspect of putting a publication together. But what I loved was being able to inform and share stories through print. Within a few weeks of my internship I knew this was what I wanted to do in the future.

About seven years ago I started in the career education sector, working my way from Foundation Coordinator to Director of Communications for the Imagine America Foundation. What first attracted me to the Foundation, were the students. As the first in my family to attend and graduate college and being raised by my grandma, I could relate to our students. I quickly learned a majority of career education students had to overcome countless obstacles to pursue higher education. Career colleges give students and their families a chance to improve their futures.

In my role at the Foundation I cultivated my editorial skills managing several research studies, one of which introduced me to Michael Cooney. After many coffee shop discussions, we discovered our shared passion for students. A few months ago I called Michael and the timing could not have been more perfect. Michael was ready to pass on his two deadlines a month. And to my complete surprise, he wanted to pass the torch to me. Words can't express how honored I was that Michael selected me to succeed him and become only the fourth editor in *Career Education Review's* (CER) impressive 88 year history of continuous publication.

In this issue, we honor Michael and the work he has done for the career education community

as well as chronicle the long history of CER. As you will read, CER origins date back to 1867! What started out as the *Creative Service*, evolved in 1994 to what it is today, through the guidance of Michael and his team. The mission of CER has been consistent, straightforward and will continue to do what it does best, provide you with crucial career college news, best practices, research and commentary.

CER will offer several new services to you; the first one is a new webinar series on Higher Education. Presented in partnership with Ritzert & Leyton PC, we will be covering crucial issues concerning the career education sector. Topics include Gainful Employment II and Managing Open Program Reviews. To learn more, visit [www.careereducationreview.net](http://www.careereducationreview.net) or contact me.

As we move forward, I welcome your suggestions, comments and ideas. If you would like to receive email updates from CER, please send me your contact information and I will add you to our distribution list. CER is working on several new ideas and would love to keep you informed!

On a final note, I want to personally thank Michael for being a peer, mentor and friend. I am thrilled to continue providing CER to the career education community and start my new journey with all of you.

*Sincerely,*



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CAREER EDUCATION REVIEW'S  
**Career College Event Calendar**

April 2014 – May 2014

*Dates You Need to Know*

**April 2014**

**TPI—Best Practices and Business Conference**

Annual Conference  
Hollywood Beach, FL

**April 2–3**

**DETC—Distance Education & Training Council**

88th Annual Conference  
Hammock Beach, FL

**April 6–8**

**PCCS—Private Career Colleges & Schools**

Regions I, II & III Conf.  
Financial Aid/Teacher Trng.  
Philadelphia, PA

**April 14–15**

**TAICS—Tennessee Association of Independent Colleges & Schools**

Annual Conference  
Nashville, TN

**April 24–25**

**NASASPS—National Assoc. of State Admin. & Supervisors of Private Schools**

Annual Conference  
Little Rock, AR

**April 27–30**

**May 2014**

**AACS—American Association of Cosmetology Schools**

Spring Operations Conf.  
Phoenix, AZ

**May 2–5**

**LAPCS—Louisiana Association of Private Colleges & Schools**

14th Annual Conference  
Baton Rouge, LA

**May 3**

**FAS—Financial Aid Services, Inc.**

Federal Update Seminar  
Foxwoods Casino and Resort  
Mashantucket, CT

**May 9**

**APSA—Arizona Private School Association**

Annual Conference  
Phoenix, AZ

**May 16**

**PCCS—Private Career Colleges & Schools**

Region V Conference  
Financial Aid/Teacher Trng.  
Chicago, IL

**May 19–20**

# Sector Leaders Give Tribute to Michael Cooney

CER asked some long-time friends, colleagues, advertisers, and subscribers to say a few words about Michael and what he and CER have meant to our industry and to them personally. The following speaks volumes about what Michael Cooney has meant to career education these many years.

“As a *Creative Service* subscriber since the 1970’s, or maybe even before that in the late 1960’s, I remember when the then publisher, and son of the founder, Lee Baxandall introduced their new staff member and photographer Michael to us through their publication.”

Soon, and then at almost every national event the private school sector held, a most familiar face appeared with a camera poised to capture us as we went about our work and play at these events. Michael was ever present – quietly, but very professionally, capturing the faces and successes

of each of us in the “school business” (now called “sector” by many of us, and “space” by the investor crowd).

Michael has been our chronicler—picturing and interviewing us (and yes, Michael I was available for that one last interview with you last week) always asking the penetrating but fair questions and getting us to open up and share what we knew and felt. He did it professionally and we trusted him knowing he would share our comments fairly.

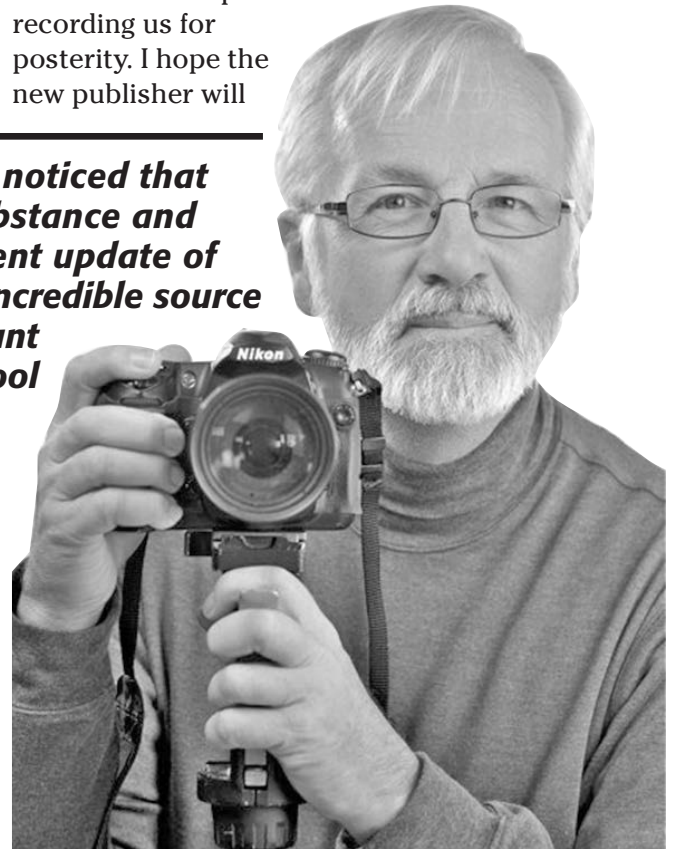
Michael—you will be missed in your role as publisher and top-flight photographer, but I hope to still see you at our conventions doing your thing. Quietly moving about us as we partied, learned, and shared friendships and recording us for posterity. I hope the new publisher will

---

***“Upon arriving at APSCU, I immediately noticed that Michael's work is always focused on substance and content. His work produced both a current update of things happening in the sector - and an incredible source of knowledge about the issue. I could count on his articles to serve as an education tool in every definition of that word. As we hand the baton from one generation to the next, it is essential we maintain the level of decency, quality and respect that brought us this far. With Michael's retirement we celebrate both the quality of the man and the quality of the product. That is a legacy worth celebrating!”***

***– Steve Gunderson, President/CEO,  
Association of Private Sector Colleges and  
Universities (APSCU)***

---



use your talents and experience as you choose to make your time available to them.” - **Dr. Al Sullivan, Chancellor, Sullivan University System**

“Michael, you brought us news that gave us the insight that was difficult to find anywhere else. Your knowledge and understanding of the past coupled with your choice of news articles, editorials and conference presentations always painted a vision of what we could expect in the future. And from a personal perspective; your friendship, kindness and warm sense of humor will be missed. Enjoy your retirement, but stop by from time to time... as you will always be welcome.” - **Mitch Talenfeld, CEO, MDT Direct**

“I had not heard about Michael’s decision to retire, and I will certainly miss him. I have only had the pleasure of knowing Michael for the past 15 years after getting on the higher ed conference circuit. I have always found him to be a very bright and informed observer of the higher education community and a genuinely pleasant individual even when he is debating points with you. I learned several years ago that Michael and I are fellow Rotarians and that he has participated in his Rotary Club’s service project in Lima, Peru, along with being a capable bartender at his club’s meetings! Michael has been one of those constants in the otherwise ever changing world of higher education, and he will be missed by many. While I wish him a long and enjoyable retirement with his family and close friends, I hope he will make an occasional – maybe even a surprise – guest appearance in the future at APSCU or some other industry conference.” - **Ron Holt, Partner, Dunn & Davison, LLC**

“I have only known Michael for a decade or so I guess. We seemed to have a shared desire to help the sector through the work done in admissions. He always encouraged me to write articles, do research and report back. We even co-authored/co-created some charts/graphs and articles. I am happy to be part of his tribute!” - **Dr. Jean Norris, Managing Partner, Norton | Norris, Inc.**

“Michael’s contribution to our sector goes well beyond his successful work with the Career Education Review. Michael has mentored many of us in the sector and has helped many entrepreneurs succeed with their ventures. He has influenced so many people with his personal insights and willingness to freely share his thoughts. I remember Michael approaching me at almost every conference to give me new ideas! And I never forget what he told me after three years of running MaxKnowledge. He congratulated me and told me that I’ve passed the

three-year mark and I’m here to stay! I really appreciated Michael’s comments because I knew he has seen so many service providers come and go! Michael’s

---

***“Michael has been a constant since I started serving in the sector fifteen years ago. He is the consummate gentleman who always had the best interests of our schools in mind. He cares deeply about the missions of our institutions and worked tirelessly to articulate our contributions through a variety of mediums, most notably and visibly through his camera.”***

**– Jason Konesco, CEO and second-generation subscriber, Harrison College**

---

dedication to the career education sector is truly admirable. His written words and memorable photographs have skillfully captured the ups and downs of our sector and he will always be remembered for his passion for student success. I’m sure we’ll see him around as I can’t imagine that he would be able to fully retire from his work!” - **Amir Moghadam, Ph.D., President/CEO, MaxKnowledge, Inc.**

“Over the years, I had many interesting conversations with Michael on a number of topics involving our schools and our sector. Michael was always objective and unbiased during our conversations. The same can be said for the articles he included in CER. I always knew I would read CER and walk away with a factual understanding of situations affecting our sector. Michael reported the negatives with the positives. In any case, I always felt the information valuable to me and anyone involved in our sector. Michael has provided a true service to all affiliated with our schools. I, for one, will truly miss seeing and talking to Michael at various meetings throughout the year. Much happiness, Michael, in all your new endeavors. You are most deserving!” - **Dennis Spisak, President, DJSpisak Consulting**

Perhaps Peter Leyton, Founding Partner of Ritzert & Leyton captured how we all feel the best:

Michael, beneath the laid back appearance, is a man of strong principle and curiosity. His dedication to the proprietary education sector was evident in all of his work whether on the state board, in presentations, writing or photos.

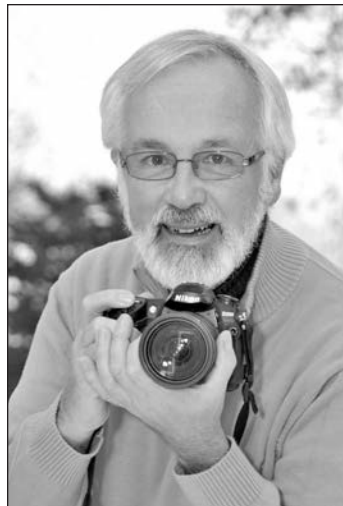


# Michael Cooney the Man Behind the Camera

*I*t's about students. It's always been about students. Everybody who truly believes in the sector knows it is about students; and, everything works if it is about what is best for students. – Michael Cooney

We have all seen Michael Cooney's camera, up close and personal on occasion. He has dedicated the past 37 years of his life to reporting on and supporting career education. As you probably know, Michael retired February 1, 2014 as editor and publisher of *Career Education Review*. This is a tribute and farewell article, based on interviews with Michael. CER hopes to document our history and four decades of support to the industry, and thank Michael for his years of dedication to career education. He will be missed by many.

*Career Education Review's* (CER) roots go back to just after the Civil War. In 1867, Oshkosh Business College was founded in Oshkosh, WI. From Oshkosh Business College is where CER's origins arose. In 1917, Dean W. Gear became a co-owner, with W.C. Spring Gate, of Oshkosh Business College. Gear started doing the school's advertising. In 1924, Gear gave up his role at Oshkosh Business College and formed the Dean W. Gear Advertising Company in the same building, literally next door, or right outside the entrance to Oshkosh Business College. Gear Advertising Company (Gear) later the Baxandall Company DBA as Workforce Communications was located in its original building until about ten years ago when a redevelopment forced Workforce



Communications and CER to relocate to its current location.

In 1924, Ray Baxandall, who had just graduated from the University of Wisconsin-Madison, joined Gear to do advertising. In 1925, he created the

first brochures for Oshkosh Business College. Baxandall went on to syndicate brochures and much of what they produced was used as boilerplate catalogs for career colleges of the day. Recall, this was before the Great Depression and these schools were really "Ma and Pa" colleges. Most small and large American cities had several of these early career colleges. To say that they were highly competitive is a gross understatement. So in 1927, the "Gear Advertising Letter," which soon became the "The Geer

Creative Services," was offered as basically a source for advertising, marketing ideas and assistance with commentary. The original *Creative Services* (CS) would publish, for example, samples of letters to prospective students, or possible ads schools might want to place in the newspaper.

The CS subscription was on an exclusive market basis, because these Ma's and Pa's were very competitive and they did not want the school down the street knowing their secrets or running the same advertisement. For many years up until the 1970s or so, the publication only accepted subscriptions from one school in a particular exclusive market area. This area was jealously protected as the ideas from CS were highly valued by schools. Michael reminisced:

I (Michael) remember when I first joined the company in 1977; one of the first things

# In 1926 Ray Baxandall Had A Good Idea...



**AFTER 60 YEARS  
WE'RE STILL MAKING  
IT WORK FOR YOU!**

**Sept. 1867**

Oshkosh Business College is founded.

**1917**

Dean W. Geer becomes co-owner with W.C. Springgate; he does school's ads too.

**1924**

Geer gives up owner role in OBC, to grow Dean W. Geer Advertising in the OBC building. Raymond W. Baxandall, a recent advertising graduate of the University of Wisconsin (Madison), is employed by Geer.

**1925**

Baxandall prepares his first brochures for OBC.

**1926**

Nationally syndicated career brochures for private business training schools are tested by Baxandall. Clients sign up enthusiastically. The idea works!

**1927**

**THE CREATIVE SERVICE** is launched by Baxandall. The only marketing review for private career schools, its format has changed little over the years.

**1953**

Lee R. Baxandall, at age 18 before starting college, works half-year in firm to learn the ropes.

**1956**

Geer completes sale to Ray Baxandall of the firm, now named The Baxandall Co.

**1970**

Ray Baxandall dies still doing what he likes best. Lee R. Baxandall becomes owner and chief executive. In subsequent years, school client base is broadened to include many additional career areas. Full-color printing becomes predominant. Michael J. Cooney joins firm to develop a television—media—a/v capacity of service.

**1985**

Key employees ownership plan is initiated. President is Lee R. Baxandall, Vice presidents Michael J. Cooney (Marketing), Shirley Lemieux (Administration) and Margaret Thornton (Finances). We're still in the OBC building, and Oshkosh is nearer to you than ever. Call toll free for marketing products and services you need!

**WORK FORCE COMMUNICATIONS**

**The Baxandall Co.**

**800 558-8250**

Al Sullivan gave me a hard time about was the fact that we were now sharing his secrets with his competitors. And, he did not like that and wasn't sure he wanted to be a contributor. So it went on for a long time as an exclusive kind of club for ideas and information. Part of that "membership" was the benefit that before the annual conventions of the United Business College Association (predecessor of APSCU) the exclusive subscribers club would come together, share ideas, and Ray Baxandall would bring them very elaborate presents like custom printed calendars and artwork. It was really the ultimate meeting to go to prior to a convention.

Michael compares those meetings to today's Private Sector Research Council (PERC) meetings, with the idea exchanges and shared best practices, but sans the calendars.

Lee Baxandall, Ray's son, joined the company in 1953 at the ripe old age of 18. He wrote 12 rather obscure books and he did all kinds of other things. He worked his way through college and went off to New York for many years to be an intellectual Off-Broadway playwright, along with all kinds of

other ventures. Lee also wrote advertising copy for the company through that period.

In 1956, Ray Baxandall bought the remainder of the company from Gear. The Gear Advertising Company had evolved to becoming the Baxandall Company and the publication became "The Baxandall Creative Service". Ray continued running the company with Lee in New York until 1970 when Ray died at age 70 on his way to work. Son Lee then ran the company from 1970 to about 1977, commuting from New York once a month, editing the publication, and producing the advertising materials, which were all print materials at that time. Lee moved to Oshkosh in 1978 where he ran the company as well as his other publishing ventures. He renamed the company Workforce Communications.

Michael joined the company after having completed his MBA at the University of Wisconsin-Oshkosh in 1977. He basically did special projects, but those special projects quickly became broadcast television commercials. These commercials were the first to be syndicated and license to the career college sector. Workforce Communication's commercials became the principle provider of TV ads for the sector for many years, particularly in



### Meet Michael Cooney

Born: New London, WI 1945

Raised on a Wisconsin dairy farm.

Undergraduate is in Post-Secondary Education, Speech and Drama from University of Wisconsin – Oshkosh. 1969

Drafted in the U.S. Army upon graduation and served in Bremerhaven Germany 1969-1971

Fulfilled a lifelong desire to work for the Boy Scouts, as a camp director and District Scout Executive on Cape Cod. 1972-1974

Returned to Oshkosh to earn an MBA at the University of Wisconsin - Oshkosh 1974-1976

Inadvertently perfectly prepared for a career he did not know existed by becoming a TV news stringer covering barn fires and car accidents at all hours of the day and night while in graduate school.

Took undergraduate courses in radio, TV, film and photography, because as a graduate student he could take them for free thus, became self-trained in journalism and media production.

First commercials were in the field of education, for the Army ROTC program and for the UW-Oshkosh, Graduate School of Business.

Met Lee Baxandall at the local natural foods restaurant where Michael hung out as the "artist in residence."

Employed at Workforce Communications 1977 through 2014, co-owner since 1988, editor and publisher since 1994

Wisconsin Educational Approval Board for 10 years, served as Board Chair 2006-2013

Co-founder of Project Peru, a partnership of four Rotary Clubs and two Peruvian municipalities that operates five "soy cows" that provides the primary source of protein to over 6,000 people a day in the Lima area.

the era of the small chains and Ma and Pa schools. Michael contributed his creativity in advertising to *The Creative Service* shortly after joining the company, but only on an irregular basis. By the middle of 1985, Michael along with several other employees became partial stockholders in the company, and started the evolution towards ownership.

*The Creative Service* continued the publication until approximately 1994. At that point, Lee's true passion in life and other business interests took him away from the company and the publication. Michael had assumed additional roles at *The Creative Service*. It only seemed natural for Lee to ask Michael to become editor. Two years later, with the help of Steve Freidheim, current

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***When asked how the good news compared to the bad, over the years, Michael recalls the good deeds of career colleges far outweigh the few instances of poor behavior, much of which was misunderstood or wrongly reported.***

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CER advisory board chair, Cooney and Workforce Communication's team relaunched the publication and changed its name to *Career Education Review*. "The Creative Service made sense when we were providing a lot of print advertising supplements," said Michael. "So as we moved away from that, we knew we weren't an academic journal, nor did we necessarily want to be, but we wanted to cover the whole spectrum in terms of best practices and what's happening and also as an information exchange for the sector." In 1994, CER became what it looks like in today's format. The publication modernized a great deal of the content that had grown very old and kind of archaic from the earlier days.

Michael recalls the late 1980s and early 1990s—the early days of Federal Student Aid. Then as today, much of the press on career colleges was not so good. Michael reported the good news along with the bad. He was quoted in the damaging Nunn Report and still stands by his honesty and openness to the truths of the industry. Michael

learned that "the untimely telling of the truth is never popular, but often necessary." This is despite the fact that some articles about school closings and negative issues cost CER many subscribers. Yet today, CER stands on its founding principles of honest reporting of facts with special emphasis on best practices, emerging technologies, and curiosity for the truth. When asked how the good news compared to the bad, over the years, Michael recalls the good deeds of career colleges far outweigh the few instances of poor behavior, much of which was misunderstood or wrongly reported. When asked for an example of reporting the good with the bad, Michael recalls:

The thing that comes to mind was the closure of the Computer Learning Centers in the year 2000. The press was full of all kinds of information and stories. I remember sitting there and saying 'it's time that somebody told the truth.' I started working the phone and it was the week that everybody wanted to confession to me. We did a special issue on the closure of the Computer Learning Centers (CLC), with all kinds of people who I didn't know but were only too willing to tell the story from their perspective. So we did a very detailed chronology of the closure of the Computer Learning Centers. The exact cause can only be speculated about; only the people within the Department of Education really know fully. But we did a really good documentation of facts, which I was really proud of given all of the bad press reporting of that particular time.

When pressed for an example of good news reporting, of which he was especially proud, Michael continued:

From 2004, we did a number of special issues on retention, classroom procedures, techniques and other creative academic issues. We took great pride in pulling together the best of the best on admission, which brought us to some of the special issues that we have done. Probably the thing that I'm the proudest of was in 2008, with cooperation and support from Pearson, we did the first special issue on

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service learning. Andrea Shaw from Pearson and I spoke around the country, every chance we got, on the whole concept of service learning. We believed that we really brought that concept from a few schools in the sector, to many schools in the sector. Then recently we produced with Pearson a second special issue on service learning that really advanced the thinking far more. Service learning is often on breakout session agendas, with new speakers and new schools. So I am very pleased with that contribution along the way.

The other issue that we've taken on in recent years was the whole issue of credentialing and badging and being one of the first to introduce that concept to the sector as well. My partner in all of this has been Dr. Gary Meers from MaxKnowledge. As I always kiddingly told him, 'I've got the ideas and he's got the expertise.' So I got the easy part and he gets to write the academic descriptions of how to do service learning or badging and some of the other innovative concepts.

When asked about his passion for and definition of service learning Michael responded:

I am an Eagle Scout and I have always been engaged in community service. The non-profit sector has been a part of my life. I've been a Rotarian now for over 20 years. I also believe it. I just know that I personally have learned by working in the service sector with non-profits. That's where I test my ideas. That is where I have developed a lot of my skills. A lot of my interview skills and my photography skills were all done in the non-profit sector, before I started charging people for them. But service learning is just the right combination of putting meaning and practicality to classroom theory. The challenge of service learning is to get institutions to move beyond the "service project" mentality and really integrate the service component into their curriculum. When done right service



Terry Staerkel, production manager and Michael Cooney, editor of CER, review content of an upcoming issue.

learning benefits the student, the institution and the community and maybe the very best way to educate students.

While all of higher education is taking on service learning in some manner. I think the career college sector can do it better. I think it will enhance not only the learning, but also the confidence of students and the satisfaction of students that they can make a difference. Often for a lot of our students they've never had that experience of being the provider of service.

I think badging and this whole idea of credentialing for very specific competencies makes huge amounts of sense. Breaking down learning into small competencies and then acknowledging that competency and letting students putting these together as building blocks to whatever direction they may want to go. It just feels absolutely right. Back to my scouting background, it came from merit badges.

I also enjoy very much being in the classrooms as both an observer and instructor. I had this experience some years ago when I was doing commercials for the Computer Learning Center in Springfield, Virginia in the mid-90s, or earlier, and walking into a classroom and there were 21 students there, all of whom responded to my TV commercial because they had no other extra



Michael Cooney and with some of the models from a TV commercial shoot.

advertising for the program at that point. It was very satisfying to see the faces of people who's lives I had help touch in 30 second.

Michael argues that CER provides real value to both readers and advertisers. Most subscribers are owners, CEOs, and executives. He has to remind himself, as an editor, that readers are running schools every day. They would like to go out and think about all the big things and new

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***To me the world of ideas and best practices in the education sector is just really exciting and it's always excited me, because it impacts lives, it's seeking answers that we'll never quite have totally, but there's a whole community of people who are seeking it with you.***

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ideas. However, there is probably a student with a problem in their lobby waiting to see him or her. CER assumed the role of the aggregator of information, ideas and best practices. CER attends most of the main career college conventions and association meetings, bringing back the best innovative ideas to readers.

It's important to note that while Michael has been the face of the CER, he couldn't have done

what he did without the support of his business partner Margaret Thornton and a dedicated office staff that did what ever was required to get the CER in the mail.

Michael is focusing his time on his passions, traveling, teaching and photography. Recently, Michael created the Lewis Hine Photography Institute at Fox Valley Technical College in Appleton, Wisconsin, which brings national

level speakers for an intensive seminar once a year. Additionally, Michael created the Green Lake Photo workshop, which will be a weeklong program in a resort community in Wisconsin. "I continue to produce TV commercials. Please know that I'm still in business doing the TV commercials for schools and I enjoy that very much," said Michael. With his extra time, his goal is to complete a book about Pioneer Churches in Wisconsin, which he has been working on for the last five years.

Michael's parting advice to Jenny, "The most exciting part about being the editor of *Career Education Review* is you can pick up the phone and talk about big ideas and practical applications and best practices and get off the phone and say well, that was neat! Wow! I didn't think of that! To me the world of ideas and best practices in the education sector is just really exciting and it's always excited me, because it impacts lives, it's seeking answers that we'll never quite have totally, but there's a whole community of people who are seeking it with you. So just be curious and fearless.

*If you would like to contact Michael he can be reached at [mcooney@workforce-com.com](mailto:mcooney@workforce-com.com).*

## Message From the Publisher

Career college administration is a second career for me. In fact, as with most of our students, education was a second chance for me. I received my bachelor's degree at the ripe young age of forty. Finishing high school at night, so long ago I care not to remember, or am unable to remember, is probably what gave me my original passion for the typical career college student. Many brag of working their way through college. I worked my way through the 11th and 12th grade. I am not a second generation "school person," and got my education in career college management in non-traditional ways also. When I started, there was no master's degree or any degree in career college administration. (More on that later).

When I first met Ken Horne, my partner in Virginia College, in addition to many valuable lessons, he gave me two tangible things and one especially useful piece of advice. The first was a cardboard box full of PERC ideas. He told me if someone would just implement those ideas, an incredible college could be built. The word of advice was to start doing accreditation visits, as it was the best training around and someone else paid your expenses to obtain that training. (Ken has never met a dollar he did not want to save). One other thing he gave me was the amazement of watching him haul sheetrock, sweep floors, and (I swear) clean toilets. All this in a herculean effort to double the size of a school so that students in a teach-out would not have to miss an hour of class, and they did not.

The Keiser University Center for Career Education and Leadership (KUCCEL) mission is:

- *To provide fact-based solutions for delivering high value in all areas of career education, through outstanding leadership, highest of ethical standards, and sound business principles*

Our Focus is on:

- *Career Education and Training*
- *Disruptive Modalities for Learning*
- *Workforce Development*
- *Ethical Leadership in Education Services*
- *Value Creation for all Stakeholders*

The other tangible thing, every month, over the years, was his copy of *Career Education Review (CER)*. He told me to read it and I would learn much about how to manage a school. Just as with many in the "school business," I read it every two weeks and shared subject matter articles with my team. Over the years, CER was basically my only source of written materials with which to learn the ins and outs of college leadership. I found, and still find, the articles to be especially useful to new employees. I have never read an issue without learning something new.

Now as managing director of KUCCEL and program director of the MEd-CCA, the only program of its type of which I know, I can assure you there are no textbooks on career college management. There are few, scant few, articles or books; and most of them are negative. *Career Education Review* is still one of the only sources of written information about what we all do. Once our budget lessened a little, I started attending APSCU (then CCA) and learned much from the various breakout sessions. I have now done several dozen accreditation visits and learned something on each and every one. Both APSCU training and accreditation visits proved to be invaluable to my education in education. However, still today, if I find myself on a long flight, I cannot attend the APSCU Leadership Institute and reading a self-study will put anyone to sleep, I turn to CER, which continues to be my best source of information on best practices and good ideas.

At my first CCA conference, I met Michael and his infamous camera. His dedication to the industry and knowledge of the sector is unparalleled. I just recently learned his service at CER goes back almost forty years and the magazine has been in publication since before the Great Depression. Don't tell Michael, but I have used his articles in my Career College Administration classes many times ("Fair Use" in education, right?). So, when we formed KUCCEL, Michael was one of the first people I invited to join the advisory board.

It was through this association that Michael called last fall to tell me he was hanging up his

CER camera. Knowing KUCCEL's mission and knowing the incredible volumes of career college news and information in his archives, Michael posed that KUCCEL and CER should form a strategic alliance. It was a natural partnership. Michael thought two of KUCCEL's foundations, research/new information and library/repository of historical documents, would be perfectly served in alliance with CER. Due to the void of written information on career college administration, it turns out that the third pillar upon which KUCCEL was built, education, was already being served through CER's vast volumes of articles. The articles offer futuristic visions of MOOCs and Adaptive Learning and historical writings of best practices in shorthand, penned before even I was born, actually, long before. After the monumental task of scanning and indexing the hundreds of volumes and thousands of articles, they will be available for industry research and education. Currently we have eDocuments going back many years. If you have a topic area you want to research or need some best practices for student services, let us know.

KUCCEL and CER are committed to continuing the history of service through information on

career colleges. We are anxious to learn your ideas on how we may better serve this vision. One common theme was evident in Ken and my wife Linda's cleaning (yes, she helped, while I did the easy job and hired teachers and scheduled students). That same theme is throughout CER, and up and down the halls of Keiser University and every career college I have ever visited. That theme is: Students do matter and so do you.

It is among the highest honors of my career to accept the role of publisher of *Career Education Review* and to thank Michael Cooney for his years of hard work and dedication to students and to us all. Join us today.

James D. (Jim) Hutton, PhD  
 Managing Director KUCCEL  
 Program Director MEd-CCA  
 Publisher *Career Education Review*

#### About the Center

Keiser University's Center for Career Education and Leadership (KUCCEL) is a not-for-profit center committed to advancing the scholarship, promotion and betterment of career education and global workforce development. To accomplish these goals, KUCCEL prepares current and future leaders in career education, offering a range of innovative online professional development and continuing education opportunities. The Center also conducts scientific research on private, postsecondary education in America, examining the increase in student demand and the growing responsibility of this sector to meet the goals of our national education agenda. KUCCEL, a part of Keiser University Graduate School, serves as a resource and repository for information documenting the long and important history of private colleges and schools.

#### KUCCEL Advisory Board

Mr. Michael Cooney, Former Publisher,  
*Career Education Review*  
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Career  
 Education  
 REVIEW



# Regulatory Visits and Investigations: A Primer

By Katherine Brodie and Robert (Ben) Walker, Ritzert & Leyton, P.C.

Given the current environment in which proprietary colleges and schools operate, the risk of increased, more stringent and/or unexpected visits or formal investigations by regulatory authorities has probably never been higher. That is why we frequently speak on this topic at national and regional conferences to share advice and best practices to prepare for and manage these events. At best, these visits or investigations provide the institution an opportunity to demonstrate strong compliance with applicable regulations and standards. At worst, they can spiral into negative agency actions and/or a

multi-agency focus into the institution's operations. Every school and situation is unique, so this article does not provide legal advice specific to your

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***Whether the visit is routine or non-routine, managing it well is important to minimize risk and maximize benefits.***

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institution. But it does offer guidance we hope is helpful, or at the very least thought-provoking, as we continue to weather this storm of scrutiny together.



**KATHERINE D. BRODIE** provides counsel to the Ritzert & Leyton's domestic and foreign nonprofit, public and proprietary college and university clients, and their investors and business partners, on a wide range of federal and state regulatory compliance and accreditation

matters, including providing counsel with regard to the numerous Department of Education regulations to which higher education institutions are accountable as condition of their Title IV (student financial aid) program participation.

Prior to joining Ritzert & Leyton, PC, Ms. Brodie served as VP for Government and Legal Affairs at a national higher education trade association where she worked collaboratively with association membership and Board of Directors on priority policy and legal matters,

including significant federal litigation. She began her legal career at Akin Gump Strauss Hauer & Feld, LLP in Washington, D.C. where she practiced law as Associate from 1997-2003 and as Counsel from 2003-2009 in the firm's Public Law & Policy Group. She is a member of the National Association of College and University Attorneys (NACUA) and a regular speaker at national, regional and state higher education stakeholder meetings. She earned her A.B. at Bowdoin College (English literature) and her J.D. at George Washington University Law School. She is licensed to practice law in the District of Columbia, Maryland and Virginia (pending).

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**Who May (and Does) Come Calling?**

The good news is that, so far, the Federal Maritime Commission has not come knocking at the door of any for-profit college (at least as far as we know)! But seriously, it seems as though nearly every federal agency with any jurisdiction over for-profit schools has investigated some aspect of their operations. And they are well

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***Often, you may not know exactly what triggered the review or what the agency is looking for unless the institution has received a formal request for information or subpoena that details the information the institution is obligated to provide.***

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within their right to do so: any entity (governmental, quasi-governmental or private) that provides funding, accreditation or authority to operate an institution or to participate in a program has the responsibility to

examine closely whether the institution meets and continues to meet that agency’s requirements. That includes, among others, the U.S. Departments of Education, Veterans Affairs, Defense, Immigration and Customs Enforcement, Labor, as well as the Federal Trade Commission, Federal Communications Commission, and the Consumer Financial Protection Bureau. Whether you realize it or not, all of these agencies possess investigative power over

institutions. At the state level, those with investigative authority may include state licensing and state education grant agencies and the office of the state attorney general (who has authority to investigate compliance with state consumer protection, credit, or other relevant state laws). And, as you know, an institution’s programmatic and institutional accrediting agencies also routinely review and investigate school operations. For the purposes of this article, the foregoing entities are referred to as “agencies.”

Your school likely already knows well which agencies are likely to come calling for routine “compliance check” purposes. For example, site visits are common during the re-accreditation process. However, agencies are increasingly conducting non-routine (either announced in advanced or unannounced) visits or issuing requests for information – a circumstance that reflects heavy pressure on these agencies to ensure high levels of compliance but sometimes the agency’s receipt of negative information (i.e., media reports or complaints) about an institution. Whether the visit is routine or non-routine, managing it well is important to minimize risk and maximize benefits.



**ROBERT B. (BEN) WALKER JR.** works closely with the postsecondary education law group and has participated in a broad range of investigations, including regulatory and civil matters with the U.S. Department of Education, as well as state and accrediting agencies. He has also focused on

criminal investigations, including issues involving or relating to the administration of Title IV, HEA program funds. He helps clients assess and then address compliance matters as well as submit data to various regulatory bodies.

Mr. Walker earned a Bachelor of Arts degree from the University of Virginia and received his law degree from the University of California Hastings College of Law, where he was on the staff of the Hastings Law Review and served as a legal extern for Chief Judge Marilyn Hall Patel in the Northern District of California. He is admitted to practice law in Virginia.

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### What May Trigger a Visit or Investigation?

What triggers a visit or investigation at a particular institution varies. For example, the Department of Education is charged with maintaining the integrity of its Title IV programs and, therefore, is more likely to conduct a program review where there are signs of weakness such as a high cohort default rate, high withdrawal rate, sharp increase (either volume or gross amount) in Title IV disbursements, or for any reason it believes a school may pose a threat to Title IV program funds. Some other events that may trigger a review include complaints filed with an agency by students, graduates, and/or current or former school employees; negative publicity; constituent letters to Congress; local or national news investigations; referral from lower level agency staff about a potential problem, or simply a lapse of time since the agency has last taken a close look at the school. Often, you may not know exactly what triggered the review or what the agency is looking for unless the institution has received a formal request for information or subpoena that details the information the institution is obligated to provide.

### What Should You Do When You Are Subject to a Visit or Investigation?

Clearly, visits that are routine or announced in advance are quite different from unannounced visits or formal or informal investigations (whether on site or through document requests). The former are likely designed to ensure ongoing compliance, while the latter are motivated by an interest in or focus upon a specific issue (e.g., compliance with the incentive compensation regulations). With regard to this latter category, institutions should consult experienced counsel to establish

strong protocols from the start with regard to agency communications, retention of documents and overall strategy. This need is particularly acute if an institution has received a formal Civil Investigative Demand or subpoena compelling the production of documents.

With regard to on-site visits or informational requests designed to

confirm the institution's ongoing compliance with regulations and standards, the best approach is to view these events as an opportunity for the institution to impress the agency and its visiting

team. Take advantage and do not self-sabotage by lack of preparation or effort. The time, effort, and expense of adequate preparation will reap dividends. On the flip side, lack of preparedness also sends a message, but not a positive one.

#### Some basic tips include:

- Communicate with your employees about a scheduled agency visit so they are not surprised or concerned. Lessening the tension and anxiety of staff will leave the visiting team with a much better impression.
- Review information the agency makes public about its regulations, standards and processes and procedures for conducting visits and inquiries. Much of what the agency needs to confirm is hidden in plain sight in these publicly available documents. Many accrediting agencies, for example, take pride in the fact that they are transparent about how they expect on-site visits to be conducted.

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***Keep a clear record of what is being requested from the agency. If possible, get requests in writing or take notes about what is requested verbally. Keep a detailed record of what you have provided in response to requests.***

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This type of detail will help you better anticipate what a visiting team will assess so that you can respond appropriately.

- Establish clear lines of communication. Designate someone to be responsible for managing all communications with the agency before, during and after a visit or written response is submitted to an agency. Your goal is to have clear, thorough, positive, cooperative and consistent communication with the agency.
- Keep a clear record of what is being requested from the agency. If possible, get requests in writing or take notes about what is requested verbally. Keep a detailed record of what you have provided in response to requests.

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***Consider holding mock interviews in advance of a site visit, but be careful not to “coach” employees on what to say.***

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### **What Will the Visiting Team Likely Want to See?**

This will vary based upon the type of visit and the agency visiting, but it may include:

- **Academic information:** course schedules, syllabi and student enrollment data
- **Financial information:** student financial aid records, ledgers, attendance records, etc.
- **Staff information:** organizational charts, evidence of professional development/in-service training
- **Institutional information:** corporate charter, Board meeting minutes, faculty meeting minutes, documentation that the facilities are in compliance with state, local and federal requirements (e.g., fire, safety, sanitation), and advertising and promotional materials
- **Accreditation information:** state

licenses, correspondence with regulatory agencies, and correspondence with the Department of Education

### **Who May the Visiting Team Want to Interview?**

- Any school official. This may include faculty members and staff (especially personnel in admissions, financial aid, registrar and career services/placement divisions).
- Possibly students, though this is typically a less frequent request from agencies other than the Department of Education.

### **Preparing for Staff Interviews**

Consider holding mock interviews in advance of a site visit, but be careful not to “coach” employees on what to say. The purpose of a mock interview is to build confidence and ensure staff members can clearly explain how they perform basic job functions. If staff members do not provide consistent information about processes – consistent both with one another and with internal policies/procedure – this can indicate larger compliance concerns and a need to ramp up your training.

### **What Is Likely to Impress a Visiting Team?**

Visiting team members are people like you. Think about basic things to make their visit more productive.

#### **For example:**

- Is there sufficient space for the visitors?
- Have you provided them with the location of the restrooms?
- If you have a wireless connection, is the password made available?
- Do you have extra office supplies (pens/pencils, paper, stapler,

post-it notes, etc.) ready in case the team needs them?

- Have you followed the instructions provided by the agency in advance of a particular visit? For example, have you completed (and submitted) any required forms or reports?
- Have you complied with requests the team has with regard to needs for the visit (e.g., dedicated meeting room available, access to a copier/printer)?
- Is water available?

#### **Be prepared when team members arrive.**

- Greet them immediately upon arrival so they do not wander around looking for help.
- Have the Campus Director ready to introduce him/herself to the team so the team knows the Director is ready, willing and able to help them.
- Engage the team, show them to their meeting room and assist them settling in.

#### **Impressing the Agency with Your Documentation**

In addition to the actual visit, the way in which documents and data are presented to an agency can significantly impact an agency's impression of the institution. Put yourself in their shoes: contrast how you would feel with being the recipient of a "data dump" designed to make the agency do the hard work of finding and organizing the material versus receiving well organized and labeled documents.

#### **Ask yourself:**

- Is all data organized? Clearly labeled? Are related documents kept together?
- Is your data complete and up-to-

date? As examples, check personnel files, policy and procedure documents, syllabi and faculty information.

- Can you readily access information stored electronically?

#### **Additional Thoughts on Preparation**

Hold a mock review in advance of a visit. For instance, create a list of 10

students and ask financial aid staff to produce a complete, up-to-date financial aid file for each student. Can academic staff do the same? A good

goal would be to produce ten complete student files in one hour.

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***If you have to explain inconsistent contents of each file and where additional file contents "might be found," you are already lost.***

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#### **Review this sample to determine:**

- Is there any missing data/information?
- Are files organized in a *consistent* fashion?
  - A "file organization checklist" is a very useful tool to ensure consistency.
- Do the files tell the entire story about the student's financial aid activity and academic success?

#### **Why Consistency Matters**

If you have to explain inconsistent contents of each file and where additional file contents "might be found," you are already lost. Agencies are generally understaffed and want to get their work done quickly and efficiently. Making their review easy for them will increase their confidence in your organization.

#### **Crafting a Persuasive Submission**

Whether your institution is provided an opportunity or required to make a written submission, make it count.

Impress your audience by providing a complete, straightforward and well-organized document.

- Double-check your bookmarks and links between documents when you submit data electronically (.pdf).
- Be specific when responding.

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***Agencies see certain issues repeat, time and again, at various institutions. Our informal survey revealed a few common problems identified during visits.***

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Vague (or worse, misleading or inaccurate) answers will be considered incomplete and often raise additional questions for future follow up by the agency.

- Use your narrative to “show” institutional compliance with reference to specific documentation or actions, instead of passively “telling” the agency the school is in compliance.
- Take the time to:
  - Review each and every question or requirement presented by the agency’s request.
  - Respond to each specific item and do so completely. Answering only half of a question raised by the agency is a guaranteed way to ensure additional scrutiny.
- Present and provide *evidence* to support your statements. For example, compare “The School revised its Catalog to address the Commission’s concerns” versus “The School implemented revised policies and procedures to address the Commission’s concern that students did not receive enough information about the institutional refund policy. *See, Course Catalog (revised on February 1, 2014) at page 5.*”
  - The latter makes your point and *shows* your audience why you are in compliance.

- When presenting exhibits, only include those documents which are necessary to prove your point.
  - Drowning the agency in irrelevant materials will not help your case.
- Present and provide *evidence* to support your statements. If you do not specifically reference an exhibit as part of your narrative, it is unlikely you really need to include that document as an exhibit.

**Common Deficiencies Identified by Visiting Teams**

Agencies see certain issues repeat, time and again, at various institutions. Our informal survey revealed a few common problems identified during visits, including:

- Recordkeeping requirements:
    - Ask yourself whether you have a records retention policy that is consistent with agency rules and regulations.
  - Are files kept in fire-resistant cabinets?
  - Do you have electronic backups?
  - Have you retained data for the appropriate time period?
  - For instance, the Department of Education requires institutions maintain records relating to disbursements of Title IV funds for three years from the end of the award year during which the student received funds. *See 2013-2014 FSA Handbook (Volume 2) at page 2-127.*
  - Check the FSA Handbook for a detailed chart listing how long certain types of documents must be maintained for the Department.
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- o FERPA requirements necessitate schools maintain student data in a confidential fashion.
  - Are student files kept in a general area where students might circulate?
  - Do records containing private information sit uncovered on an employee's desk?
- Do your programs have consistent names for federal, state and accrediting agency purposes?
  - o For instance, if your PPA/ECAR lists a program by a different name than it is known for accrediting agency purposes that will likely create confusion.
- Professional development obligations:
  - o Do staff members complete in-service training timely?
  - o Is there a clear record of training completion in the faculty member's file?
- Are you required to utilize an Advisory Board?
  - o If so, are meeting minutes kept?
  - o Can you demonstrate implementation of Advisory Board recommendations?
- Are Annual Reports submitted in a complete, accurate and timely fashion?
  - o Is their adequate supporting documentation to *prove* data submitted in the Annual Report is accurate?
  - o Think about what an independent reviewer is likely to want to rely upon to confirm data is accurate.
  - o Graduate rates, licensing rates and placement rates are particular areas of focus. Make sure your calculations are accurate and supported by valid documentation.

### **Conclusion**

Having regulatory authorities investigating or visiting a campus can be a positive experience provided the institution is prepared. Expending time and effort to get ready, whether for a visit or a written submission, is always an investment worth making. Take advantage of these opportunities so that you do not create a problem or a question





# Leadership Competencies Today

By Dr. Rita Girondi, Training Masters, Inc.

In 2002, the article “Key Components of Successful School Leadership” was published in *Career Education Review*. Comparing managers to leaders, the article focused on the premise that a leader needs good management skills, but good management skills do not make a leader. Considering the necessary skills of leaders in career colleges and schools twelve years ago, what’s different today, if anything, that impacts leadership effectiveness? This question launched interesting exchanges among a group of leaders with years of experience working with career colleges and schools. In addition, supporting the goals of many campus managers and leaders through numerous years has provided me great comparative insight.

Over the years, some of the challenges have been the multitude of regulations with significant “higher

education” changes, the job market, the cost of education, economic turmoil, technology impacts, a “not college material” deeply flawed stigma, complicated financial aid processes, staffing fluctuations and the needs

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***In order to guide others in these priorities, today’s leaders must be relationship builders constantly inspiring the team.***

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and expectations of students. Undoubtedly, things have changed – or have they – when it comes to leading our colleges and schools? Perhaps very little has changed categorically, but clearly, there is change and the challenges have become more challenging! Further discussion on a few of these categories led to enlightening considerations.



**DR. RITA GIRONDI** is the president of Training Masters, Inc. She has held various positions in career colleges and schools since 1981. She is the former owner of schools in Pennsylvania. She develops and delivers motivating training sessions around the country for instructors and entire school staffs on numerous topics including “Building High Retention Classrooms,” “Creating a

Campus Culture of Greatness,” and “Making the Entire Campus an Employment Culture.” STARS®, KlickerZ®, Planet GRAD®, and online faculty development courses offered through MaxKnowledge are a few of the Training Masters products.

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In order for today's campus leaders to be effective, certain skills are necessary. While these areas are not "new" expectations, they do have new twists and require greater incorporation into every leader's role. They should

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***"Today, compliance is everyone's job!" In new employee orientations, in job descriptions, in performance reviews, during staff meetings and part of everyday duties, all staff members must have a first-hand understanding of how the regulations apply to them and their responsibilities.***

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be considered critical priorities. They include more accountability, strong ethics, team building, adaptability, attention to detail and resourcefulness, particularly when it comes to thinking and staying ahead of the curves while always being

prepared for change.

In order to guide others in these priorities, today's leaders must be relationship builders constantly inspiring the team. With student success as the ultimate goal, seeking to create the best educational experiences for them along with the strongest job entry opportunities involves creating a total campus focus on the process and the outcomes. The leaders must embrace the mission of career colleges and schools, build the campus culture within the scope of that mission and orchestrate a strong commitment to compliance confidence!

Regulations have always led campus leaders to focus on compliance and train employees to do the same. This is becoming more challenging because of the time that has to be devoted, particularly to the changes and the reporting requirements. "Accreditation has become more rigorous which overall makes us better," stated one participant in this discussion who also emphasized that today's campus leaders have to be front-minded with greater attention to the regulations.

Another participant commented on the time element. School leaders have to stay focused on regulations without becoming consumed by them. In the strongest sense, regulations can become a distraction stealing time from visibility and availability for day-to-day operational needs such as coaching employees, "roaming" the halls interacting with students and staff, observing classes occasionally and coordinating other relationship-building activities that separate leaders from managers and great cultures from mediocre ones.

"Today, compliance is everyone's job!" In new employee orientations, in job descriptions, in performance reviews, during staff meetings and part of everyday duties, all staff members must have a first-hand understanding of how the regulations apply to them and their responsibilities. Campus leaders must ensure that all employees are well-informed of the expectations and kept up-to-date. Working in a highly-regulated environment should not stifle the discussions associated with improving operations. The regulations provide a framework which effective leaders respect as they encourage employees to think strategically regarding areas of growth and improvement. It presents a challenging balance!

The evolution of technology has created interesting challenges and huge opportunities in recent years. Decisions and timing rule! The old adage, "He who hesitates is lost!" has probably never been so true. Technology has impacted every area of campus operations and will continue to do so at a pace that allows no hesitation. Everything is instantaneous! Leads from interested students, text replies in return, data storage and retrieval, report generation, forms processing, SAP monitoring and more happen at push-button speed.

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Today we have multiple ways of communicating, offering training sessions and conducting meetings without leaving our offices, homes or cars. While technology has provided faster, even instant communication, it requires a different dynamic of leaders guiding their teams. "It's good from a time management perspective but can be very impersonal. We have better, faster tools at our disposal, but we can lose quality. For example, in the past, there were more check points for accuracy of reports. Three or four sets of eyes reviewed reports. In many cases, those extra eyes aren't there today."

In some ways, our improved 24/7 technology capabilities have intruded into our personal space or at least blurred it significantly! The convenience and time/cost savings continue to drive us to using these enhanced methods of communication. Today's campus leaders need these interactive skills, yet their challenge is to preserve the personal connections that can easily be sacrificed at great cost to the culture.

While technology's impacts continue to change the way we conduct our campuses, the most fascinating element by far is the way it has altered students' learning experiences. First, consider the program offerings and the growing interest in online learning with its accommodating, flexible structure. Second, consider the availability of technology tools to enhance learning. The mannequins in the classroom corners and the charts on the walls are gone – almost! Now students learn the chambers and conditions of the heart by watching a video, hearing the heart beat and reacting to its distress on computers. Third, consider the access to information for conducting research, reinforcing understanding and building knowledge power. Fourth, instructional delivery brings technology

into the classroom with the students using their own devices to access the teacher's presentation, review the class later online and study with other Internet learning support tools almost eliminating the need for textbooks. Technology's impact doesn't end.

There are many more considerations, but one thing is definite! Learning has changed and today's

leaders need to embrace it as they guide their faculties in accessing the best learning strategies, modifying curriculum, ensuring that employer needs are

met and providing the delivery and scheduling options that students demand. "They have become savvier and their expectations are higher. We have to adapt to their expectations or run the risk of not being up-to-date." This is an exhausting but exciting process because it will continue to evolve and involve every aspect of the education process. One major challenge is taking what can be a very impersonal experience for students and making it valuable. "We've become a better customer-focused industry and we need to continue to progress in that direction."

Motivating faculty to use technology effectively and overcome any fears or confidence gaps presents a huge challenge and opportunity for campus leaders. Investment in new technology involves a major financial decision. So, ensuring that instructors are competent and confident in using new teaching tools and delivery designs cannot be overlooked. Perhaps the biggest challenge in this area for the leader is to instill in every instructor the desire to learn and utilize new technologies as they emerge and students come to

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***While technology's impacts continue to change the way we conduct our campuses, the most fascinating element by far is the way it has altered students' learning experiences.***

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us already aware of them. Campus leaders will be constantly guiding their teams in re-designing the educational experiences for students.

With the current economy, declining job opportunities and new employment laws, it can be difficult working with employers, and many of them are in various stages of technology implementation. Some still prefer the traditional

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***Motivating faculty to use technology effectively and overcome any fears or confidence gaps presents a huge challenge and opportunity for campus leaders.***

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resume – interview process while others are reviewing resumes and conducting initial interviews online. Schools need to accommodate both approaches as technology

transitions occur. Students must be prepared to approach employers and job opportunities both ways. For current students and graduates, schools must provide an online presence and prepare them to use online job search and networking opportunities. Today, we have the ability to respond quickly to employer needs by delivering resumes for their review in seconds, and again the campus leader guides the way. Building relationships with employers and accommodating their needs their way poses another challenge and opportunity.

So, have leadership competencies changed? The consensus of the experienced leaders is that some are new and some are the same. The discussions highlighted a few areas that always were and still are essential. It is more important than ever, and perhaps more difficult than ever, for campus leaders to build the “total school effort”<sup>®</sup> culture so that everyone’s roles weave together to ensure student success and the achievement of campus goals. The challenge today is ensuring

that part-time employees, adjunct and online instructors as well as other staff members who work remotely all feel a connection to each other and to the school. The importance of creating togetherness, loyalty and a sense of belonging will never change, and it starts with the campus leader who sends signals throughout the organization all the time. “The changes and the challenges open up a huge horizon if the leaders embrace the change. Leadership is more important than ever!” Developing people by paying attention to them, investing in their growth and providing opportunities to them continues to define leadership

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***It is more important than ever, and perhaps more difficult than ever, for campus leaders to build the “total school effort”<sup>®</sup> culture so that everyone’s roles weave together to ensure student success and the achievement of campus goals.***

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effectiveness. Along with nurturing a sense of belonging, this is a critical step in creating a place where people love to work, where the leader’s contagious passion filters through the organization, where the school’s mission is embraced and excellence in each person’s work is inspired by the excellence of the campus leader. As the years pass and new challenges surface, one thing will remain constant – the campus leader holds the keys to the success of the students, the staff and the school.

### School Leadership Checklist

Here is a simple self-evaluation tool that school leaders can use frequently to ensure a balance in leadership impact. A weekly review of the items listed, provide an overall perspective on the many components a school leader's role. Keep this tool in a daily planner and glance over it for a refresher, or review it periodically with the school's management team for establishing goals for everyone.

- I have been highly visible throughout the school.
- I have been practicing good listening habits.
- My managers are working well together.
- The planning process is executed effectively.
- Everyone is focused on the principles that guide our school.
- Optimism is contagious in my school.
- I set an effective example of what I expect from others.
- The Total School Effort ® is alive and well in my school.
- In all situations, the dignity of others is consistently respected.
- I know my people individually and what motivates them.
- My staff feels a sense of ownership in our school.
- I train and explain regularly.
- Staff support for and participation in student and school events is strong.
- I have established a strong basis for trust, both for me and among the staff.
- I balance firmness with compassion.
- Staff development is a priority.
- I am viewed with a high degree of credibility.
- Meetings are conducted regularly and effectively.
- My staff is very well informed.
- I have observed a class or meeting recently.
- We celebrate our successes and special events.
- I regularly give compliments and send notes of appreciation.
- I keep my word and deliver what I promise within the expected time.
- The policies and procedures that we follow are understood and helpful.
- I have learned more about an area of the business in which I have had no direct experience.
- I am delighted with the initiative that people take.
- Our system of reports and data analysis tremendously aids in running the school.
- In the event of my absence, everything would continue as scheduled.
- Each department in the school is running smoothly.
- The normal dynamic tensions in the business are actually strengthening agents.
- I delegate but don't abdicate.
- My staff is very alternative conscious.
- We regularly promote from within.
- The employees have numerous opportunities to grow and develop.
- The performance evaluation system is an integral part of each employee's development.
- Communication is clear and open.
- Daily operations run smoothly for students and staff.
- Problems are identified quickly and resolved effectively.
- My office reflects my insistence on good organizational skills and facility appearance.
- My staff sees the big picture.
- I ensure that my hours in the school make my presence and availability known across all sessions.

*Reprinted from original article in Career Education Review, Key Components of Successful School Leadership by Dr. Rita Girondi (2002).*



# Recommendations for the Reauthorization of the Higher Education Act

*By the Accrediting Council for Independent Colleges & Schools (ACICS)*

*First in a series of articles reprinted from *The Prominence and Activism of Institutional Accreditation**

## **Background & Overview**

Nearly a million students each year are enrolled in career and technical education programs at institutions accredited by the Accrediting Council for Independent Colleges and Schools (ACICS), the largest accreditor of degree-granting independent colleges and schools in the U.S. Formed by private business school owners more than 100 years ago, the agency has been providing quality assurance to the sector since 1912, and acting on behalf of the federal government since the passage of the post-World War II GI Bill.

The profile of a typical ACICS – accredited institution in 2013 is substantially different from 1912. More than 40% of the nearly 1,000 colleges and schools subject to ACICS educational quality standards and review are multi-campus systems owned and operated by publically traded corporations. Many others are multi-campus institutions owned and controlled by private equity firms that hold stock in non-education companies as part of a diversified investment portfolio. The remaining smaller institutions are privately held, single campus colleges

or schools like those of the founding members. ACICS is unique in assuring the quality of such a combination of colleges and universities.

Today's provider of accredited career and technical education typically serves students through multiple modalities (on-site and on-line) at

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***The reauthorization of the Higher Education Act provides an important opportunity for Congress to consider the extent and significance of the changing needs in the community for quality post-secondary education resources.***

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multiple locations in multiple jurisdictions, mustering education resources from a variety of sources and locales. Students are typically non-traditional, 24 years in age or older, and financially independent.<sup>1</sup> Many have one or more dependents at home and work at least part time. Many are not attempting post-secondary education for the first time; neither are they attending full time.

Amid the diversity, ACICs colleges and schools share one strong common thread: the published mission or purpose of providing professional,

technical or occupational education that leads to employment or advancement in a career or profession. The evaluation of quality by ACICS, including measures of institutional effectiveness and the outcomes of student learning, is carried out with demonstrable fidelity to the intention of successful employment placement.

The reauthorization of the Higher Education Act provides an important opportunity for Congress to consider

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***Unit record data, collected and analyzed with student confidentiality protections, may produce stronger measures and comparisons of institutional effectiveness.***

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the extent and significance of the changing needs in the community for quality post-secondary education resources. It is an opportunity as well to revisit the

definition of education quality, and the sufficiency of the current system of quality assurance: a set of private non-profit independent accrediting bodies, governed by member institutions and public members, and subject to intense, formal governmental scrutiny every five years. Most importantly, those considerations should be in the context of the independent career education resource that has grown substantially and widely since the last reauthorization. The recommendations of this report are offered in that spirit.

Recent intense scrutiny of large publically-traded independent colleges and schools has raised the political and organizational stakes for ACICS and other accreditors of for-profit institutions. From within the career education community, expectations are for greater efficiency and relevance of the quality assurance program to large, multi-campus, centrally controlled enterprises, and a quality assurance system that encourages rather than stifles innovation. Expectations from

outside the community include quality assurance that increases student success and educational achievement, discloses more information to support better consumer decisions, and reduces disparities between the numerator and denominator of education's cost/value proposition, benefitting students and government funding sources. The nexus between internal and external stakeholders is explicit: accreditation must become more accountable, transparent, innovative and cost-effective. A profound awareness of those expectations shapes the recommendations that follow as well.

As presented, the order of the recommendations does not reflect a hierarchy. Instead, it reflects an aggregation of the most salient issues affecting the ability of the ACICS to effectively assure the quality of the independent career colleges and schools.

### **Promote Collection/Analysis of Empirical Data**

Policy makers, funding sources and consumers express frustration in attempting to discern the relative quality and value of the education delivered by institution "A" compared with institution "B." Too often, the analysis begins and ends with a review of anecdotes, qualitative information and metrics designed as proxies for institutional quality, such as compliance with 90/10 financial thresholds, cohort default rates, and on-time graduation rates by first-time, full-time students. While all of those indicators are necessary, they are not sufficient to make appropriate and informed decisions about eligibility for financial support. None of them pretend to directly measure whether or not the student received an education commensurate with his or her investment of time, money, emotional and intellectual energy.

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Absent a set of highly reliable direct metrics to compare the relative performance of two institutions with each other or against a formal, established benchmark, the 2013 reauthorization is an opportunity to encourage the broader collection and analysis of individual student (unit) record data by accrediting bodies in fulfillment of their quality and institutional integrity assurance role. Unit record data, collected and analyzed with student confidentiality protections, may produce stronger measures and comparisons of institutional effectiveness. The data elements would augment if not replace the existing system of institutional evaluation that is derived solely from aggregate data at an institutional level. Effectiveness metrics should be less subject to manipulation if the basic unit of measurement is student-level data, rather than an aggregation of student data. Currently, the decisions for how to aggregate these data are driven by the convenience of the institutions or ED.gov's OPEID structure, neither of which aspire to primarily evaluate, on an objective and empirical basis, the comparative effectiveness of institutions, controlling for relevant variances in demographic and economic factors. Data collected and analyzed at the unit of the individual student will give policy makers, quality reviewers and funding sources improved capacity to evaluate "how students fare as they proceed through the educational system and into the workforce."<sup>2</sup>

#### **Preserve/Enhance Peer Evaluation**

The U.S. system of quality assurance based on peers evaluating peers through a transparent, accountable structure contributes to an infrastructure of colleges and schools that are envied by other nations. Private post-secondary career education provided by insti-

tutions accredited by ACICS attract substantial enrollment by foreign students; furthermore, foreign institutions providing professional, technical and occupational education seek accreditation from ACICS and other U.S.-based accreditors.

The Congress has an important opportunity to reiterate peers re-

viewing peers as the foundation of effective quality assurance for federal student financial aid eligibility purposes. The peer review model creates periodic

and recurring encounters between professionals with current experience and expertise in the chosen career field and those who are developing and delivering education regarding that field. The encounters are robust, comprehensive and produce a written record of findings, interpretations and disclosed decisions by the accrediting body that substantially informs the educational enterprise. It produces information about the degree of compliance with minimum standards, but more importantly transfers knowledge of best practices that foment educational quality and excellence. If peer-based, self-governed quality assurance is not mandatory for Title IV eligibility, it is reasonable to assume many institutions will altogether forego the process, which is, even with flaws, deemed by many to be the best in the world.

#### **Preserve/Enhance Self-governance Through Accreditation.**

The development of policies and standards and their application through a standardized program of accreditation requires disciplined self-

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***The Congress has an important opportunity to reiterate peers reviewing peers as the foundation of effective quality assurance for federal student financial aid eligibility purposes.***

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governance that actively and regularly solicits feedback from various constituencies and stakeholders. The feedback is considered in strengthening standards, modifying the process by which standards are applied, and in enhancing the deliberative process that produces accreditation decisions. In theory, all of those aspects of the accreditation discipline are strengthened by self-governance and accountability among peers, as well as accountability and transparency to a broader community of stakeholders.

Furthermore, the efficacy of self-governance is accountable through

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***All institutions receiving student financial aid and the accrediting bodies that review their quality and integrity must have stronger incentives to facilitate, rather than inhibit, the successful transfer of academic credit, particularly at the undergraduate level.***

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the formal, recurring reviews by recognition authorities (ED.gov and CHEA).

In practice, the accreditation community anticipates and remedies deficiencies in quality assurance proactively. For example, when

accreditors learned of weakness in the veracity of self-reported placement data, they developed and implemented higher placement standards and new, independent means for verifying the rates of placement. The independent verification protocols were developed to supplement, not replace, the peer-driven review of placement records during periodic site visits. Identifying the deficiencies and developing and implementing reforms to the peer-review process occur because of a commitment to self-governance, not in spite of it. It is unlikely that externally imposed governance that excludes participation in decision-making by member institutions could have produced comparable reform actions as quickly or efficiently.

### **Maintain Impetus for Credit Transferability**

Duplicative academic activity created by a wholesale refusal to review student transcripts solely based on source of accreditation continues to waste public resources and student investments of funds, time and energy. All institutions receiving student financial aid and the accrediting bodies that review their quality and integrity must have stronger incentives to facilitate, rather than inhibit, the successful transfer of academic credit, particularly at the undergraduate level. The Congress must reiterate its stewardship interest in the efficient expenditure of public resources by requiring the Department to fully inventory and evaluate the obstacles to academic credit transfer, including those that may be remedied by greater articulation of accreditation standards and practices, and those which defy formal quality assurance scrutiny. The impetus for credit transfer as part of reauthorization reflects prior memorialization in statute by the Congress and written guidance by accreditors that all students from institutions accredited by recognized agencies should have consideration of their academic credits on the basis of merit, not solely on the basis of source of accreditation.

### **Insist on Single-Tier System of Accreditation**

It is important that the single-tier system of accreditation in the U.S. remain manifest in the reauthorized higher education act. Acknowledging an interest by some institutions to enhance their elite status through source of accreditation, the current system ensures that all institutions – including those that serve the most at-risk and underprepared segments

of the population – are held to the same types of standards as elite institutions that serve primarily those from privileged and advantaged backgrounds. Creating two or more tiers will only serve to institutionalize social schisms and inhibit participation in quality post-secondary education by those with the greatest need for economic opportunity through education attainment. Intended or by design, the single-tier system of accreditation reflects an egalitarian orientation toward educational opportunity that is honorable and deserving of preservation. Elitism should be a function of demonstrable institutional effectiveness and performance, not a branding designation derived from federal statute or regulation.

#### **Require Benchmarks of Performance Across Higher Education**

When one set of institutions, by design of statute and regulation, confront accreditation and institutional performance benchmarks that do not apply to other segments of the higher education community, the temptation to derive elite status from government prerogative rather than objective evaluation is great. Therefore, the impetus to further stratify the system of post-secondary education in the U.S., all of which relies heavily on direct federal support and federal student financial aid revenue, is predictable. To reiterate the rationale applied to maintaining a single tier system, any new or revised prescriptive indicators of institutional performance applied to independent colleges and schools should be applied across the board. As a starting point, Congress should formally encourage the Department on the occasion of reauthorization to applying standards of retention, placement and licensure exam pass rates

by program to all of higher education through the accreditation process. ACICS's program of institutional effectiveness is grounded solidly in these metrics. Their recurring application strengthens the quality and integrity of independent career colleges. It could only fortify the effectiveness of all colleges and schools, not just those primarily focused on developing a competitive domestic workforce.

#### **Reinforce State Independence on Regulating Education**

Congress has the opportunity to remove some of the ambiguities in authority that manifest from a system that relies on interconnecting sources of regulation: the

federal government (The Department), the state departments of education and accrediting entities. The ambiguity creates voids in policy, and absent definitive guidance from Congress, regulations manifest

that interpret statutory intent from the perspective of policy implementers. Congress has an opportunity to reduce some of the ambiguity that erodes a state's authority to govern education enterprises serving residents of that state. Congress should encourage collaboration between the Department, accreditors and state authorities in developing stronger accreditation-based models for state authorization through statute and regulation. For example, deference should be paid to provisions that encourage state licensure by means of accreditation, as long as the accrediting body is duly recognized by the Department and is in good standing. This policy direction

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***As a starting point, Congress should formally encourage the Department on the occasion of reauthorization to applying standards of retention, placement and licensure exam pass rates by program to all of higher education through the accreditation process.***

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will enable states with minimal licensing capacity to focus their resources and expertise on consumer protection and information, while accreditors provide assurance regarding instructional quality and program integrity, and the Department focuses on certifying programs for student financial aid purposes.

### **About the Accrediting Council for Independent Colleges and Schools**



Founded in 1912, the Accrediting Council for Independent Colleges and Schools (ACICS) is one of the most respected and longest established national accreditors

of academic institutions in the United States. It is recognized by the U.S. Department of Education and the Council for Higher Education Accreditation (CHEA). ACICS accredits more than 800 private postsecondary institutions offering certificates or diplomas, as well as institutions offering associate's, bachelor's, and master's degrees in programs designed to educate students for professional, technical, or occupational degrees. For more information, please visit [www.acics.org](http://www.acics.org).

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<sup>1</sup> Fact Sheet, Association of Private Sector Colleges and Universities, February 2013.

<sup>2</sup> New America Foundation, January 2013

# School Members and Students Assemble for APSCU's 2014 Hill Day

*Interview with Robert Herzog, APSCU Board of Directors and Berkeley College*

Every year the Association of Private Sector Colleges and Universities (APSCU) holds an annual meeting, Hill Day, in Washington D.C. to gather all of their members at one time to help inform elected officials about the students in the sector and the institutions that serve those students. Winter storms kept some away, but the message was clear, private sector colleges and universities have a huge impact; on students and the economy.

Robert Herzog, Chair of APSCU's Board of Directors, welcomed those who braved the weather with some interesting facts from an economic analysis prepared by John Dunham & Associates and released by APSCU. In 2013, the total economic impact by the sector was 47 billion. Additionally, private sector institutes account for over \$10 billion in wages and 6 billion in combined federal, state and local tax revenues. Herzog used these facts to show the size and scope of our sector, not only just within higher education but also within the entire economy.

Herzog also spoke about Gainful Employment, telling members how important the proposed Gainful Employment Regulations (GE) were to their institutions and their students.

“Communication with their elected representatives will be vitally important in the weeks and months to come,” said Herzog.

In addition to Herzog's opening, John Dunham, president John Dunham &

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Associates presented his findings from the economic analysis. There were a plethora of key economic impact findings, both national and local. According to APSCU's press release, sent out on March 4, 2014, examples of key findings in certain states include:

- **Colorado:** Private sector institutions in Colorado have a \$1.2 billion total economic impact on the state, produce \$271 million in wages, and generate \$50 million in state and local taxes.
- **Maryland:** Private sector institutions in Maryland have a \$399

million total economic impact on the state, produce \$94 million in wages, and generate \$16 million in state and local taxes.

- **New Jersey:** Private sector institutions in New Jersey have a total economic impact of \$827 million, produce \$165 million in wages, and generate \$37 million in state and local taxes.

Attendees were able to get up to speed on where GE currently stands and how they should communicate their concerns through presentations. During the Gainful Employment and Reauthorization of the Higher Education Act Presentation, Becky Campoverde, SVP Government Relations, Kaplan, Inc. and APSCU Board Member and Sally Stoup, EVP and General Counsel, APSCU walked attendees through the current regulations, as currently proposed by the Department. Attendees received several handouts that they could then pass on to their staff, stakeholders and elected officials.

APSCU's GE document presented the devastating impact the regulation would cause. According to the handout, an estimated 1.8 million students would be impacted by 2020. Higher

education leaders agree early year earnings are a poor measure of program quality. In all sectors of higher education, students prepare for a lifetime of higher earnings and not for the amount of their first few years' wages. Wages are far from the only benefit from education, yet as currently proposed, GE focuses on early career earnings and student loan defaults.

Another major issue of concern with Herzog, APSCU, and career college leaders is the fact that the proposed regulations are aimed solely at proprietary schools of all degree levels. While short-term diploma and certificate programs at certain not for profit institutions are included, many major prestigious institutions and career paths would fail the repayment ratios, if nonprofit colleges were covered under the rule. Industry leaders wonder why, if the proposed rules are such valid and reliable measures of education value and quality, all types of colleges and universities would not be subject to the rules. For example, if nonprofit schools were not exempt from the rules, the chart illustrates examples of programs that would fail the gainful employment regulation:



**ROBERT HERZOG** is Chairman of the Board of Directors of the Association of Private Sector Colleges & Universities (APSCU), and currently serves on its Executive Committee as the Chairman. Robert was APSCU's Treasurer in 2010/2011 & 2011/2012, Vice Chair in 2012/2013

and Chair of APSCU's Public Policy Committee in 2012/2013. APSCU currently represents 1,800 member higher education institutions across the United States and serves the interests of greater than two million students throughout higher education. As a result of his work, Robert is

frequently asked to speak on public policy issues related to the future of higher education.

As an active leader in the Indianapolis non-profit and philanthropic community Robert was appointed in June of 2007 by Indianapolis Mayor Bart Peterson to serve on the Greater Indianapolis Progress Committee, a public-private advisory board to advise the City's Mayor. He continues to serve on GIPC under current Indianapolis Mayor Gregory Ballard.

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School	Program	Total Tuition and Fees On-Time Completion	Average Debt of Graduates Who Borrowed/Annual Loan Payment	Debt-to-Earnings Calculation	Earnings Necessary to Pass an Average Debt	Median Earnings Based on CPS Data
George Washington University	Law	\$149,520	\$128,341/\$15,331	20%	\$93,890	\$76,500
University Northwestern University	Journalism	\$45,120	\$19,808/\$2,366	9%	\$29,066	\$26,250
Virginia Commonwealth University	Social Work	\$35,268	\$27,179/\$3,247	11%	\$33,468	\$29,400

*\*Source: APSCU Stop The Gainful Employment Regulation.*

If the Department goes forward with gainful employment, APSCU offers several modifications, including:

- The programmatic cohort default rate should serve as an alternative to the debt-to-earnings metrics, consistent with the Department’s own concerns about sole reliance on debt-to-earnings leading to the closing of quality programs. The change from “or” to “and” in the passing measurement areas is seen as one of the most significant changes from the original GE overturned in court.
- The annual debt-to-earnings metric and discretionary debt-to-earnings metric should be set at levels supported by research rather than arbitrarily selected. The Department’s National Center for Education Statistics (NCES) released a report showing that a 12 percent threshold is too low, yet the Department has arbitrarily proposed an even lower threshold of 8 percent.

This is a sampling of the invaluable information APSCU provided to Hill Day attendees and it’s members. For more information, visit [www.apscu.org](http://www.apscu.org).

Ending the day with inspirational stories, APSCU honored five recipients with their GREAT Award. “It’s really rewarding to see the winners and hear

their stories about how they made it to the end goal and how it has improved their lives and the lives of their families,” said Herzog. Celebrating student success is a driving factor in career college success. Industry leaders wish all members of Congress could meet the five GREAT Award recipients and hear how an APSCU member school changed their lives through their own hard work and perseverance. These exceptional students are highlighted in the next article.

Hill Day remains an important event for the private sector colleges and universities, their millions of students and other stakeholders. “In Washington, it’s a constant education process because many of the people making the decisions -certainly on the Hill - aren’t familiar with our institutions, and if they are they’ve heard mostly negativity,” said Herzog. “At its fundamental core, it’s educate and advocate, right? Every year it’s a new process of educating and advocating based on the benefits on behalf of our students.”

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***“It’s really rewarding to see the winners and hear their stories about how they made it to the end goal and how it has improved their lives and the lives of their families,” said Herzog.***

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# APSCU GREAT Award Winners Are Shining Examples of Private Sector Institutions' Good Work

Members of the Association of Private Sector Colleges and Universities (APSCU) gathered in Washington, DC on March 3-5 for the organization's annual Hill Day.

The purpose of this year's Hill Day was twofold: to preserve access and opportunity for students by stopping the U.S. Department of Education's proposed gainful employment regulation and to recognize five outstanding private sector graduates with the Graduate Recognition for Excellence, Achievement, and Talent (GREAT) Award.

At the event, four of the five award recipients attended the reception and were honored for their notable academic and professional success.

"The award recipients represent the best of what we do," said Steve Gunderson, president and CEO of APSCU.

What follows are the inspiring stories of each of the GREAT Award recipients.

**Guillermo De La Riva** has a long history of service to both his country and his community. After serving three years as a cavalry scout in the U.S. Army, Guillermo decided to continue his public service as a member of the Los Angeles Police Department (LAPD) in 2007. Recognizing the importance of education to his career advancement opportunities, Guillermo



Pictured from left to right: APSCU President and CEO Steve Gunderson, GREAT Award Winner Guillermo De La Riva, CEO of Alta Colleges Dean Gouin.

decided to enroll in Westwood College's Criminal Justice program in 2009.

After graduating from Westwood in 2012, Guillermo passed his professional exams to become a certified gang expert. He was transferred into one of LAPD's gang units, but experienced a setback shortly thereafter was shot in the face while apprehending a criminal. Despite requiring numerous reconstructive surgeries, Guillermo survived the incident and continues to serve the LAPD on light duty.

"The GREAT Awards recognize graduates who have overcome great odds to achieve success in their field," said Gunderson. "Guillermo's story exemplifies the spirit of the GREAT Awards. His resilience will undoubtedly benefit him in future academic or professional endeavors."

Born with the expectation of an early death, **Gregory Dunn** has defied all expectations to graduate from college and become a successful businessman. Born with sickle cell anemia and thalassemia, doctors told Gregory's parents that he wouldn't live past the age of 18. Against all odds, Gregory played football in high

school, was accepted into college, and even celebrated the birth of his first child. However, when the mother of his child passed away, Gregory was forced to abandon his educational plans and work to support his child.

After regaining his financial footing, Gregory yearned to further his education. He enrolled in Everest Institute in 2009 to study Criminal Justice. Despite having to endure the death of his mother during his studies, Gregory graduated as the salutatorian of Everest Institute's Kendall Campus in 2012. With his degree, he has gone on to found his own security/bodyguard company.

"Gregory has proved that he is not defined by his medical conditions," said Gunderson. "He excelled during his time at Everest Institute and has translated this academic success into professional success. Gregory exemplifies the spirit of our GREAT Awards."

**Ann Gustafson** developed a love of automotive technology during an eight-year stint working with the U.S. Military Police's motor pool. As a member of the motor pool, Ann was responsible for daily preventative maintenance service and minor repairs of 25 different government vehicles. Ann was forced to leave her position after finding out that her husband was killed in military action and that she was pregnant with her first child.

To support herself and her child, Ann enrolled in the Lincoln College of Technology's Automotive Technology program. She expanded the skills she had developed with the U.S. Military Police and graduated Summa Cum Laude in 2013. Since graduation, Ann has received numerous automotive certifications and is currently a successful technician in her field.



Pictured from left to right: APSCU President and CEO Steve Gunderson, GREAT Award Winner Ann Gustafson, David Dock, campus president of Lincoln College of Technology.

“The GREAT Awards aim to recognize the academic and professional successes of America’s veterans,” said Gunderson. “Ann has done an excellent job of transferring the skills she developed in the military into her professional life. I have no doubt the education she received at Lincoln Tech helped further her career opportunities.”

**Sanetra Hall** had always been interested in furthering her education, but was forced to drop out of school to care for her ailing infant daughter and deal with her own health issues. Born ten weeks prematurely, Sanetra’s daughter Jada was born with a host of medical complications that kept her in the hospital for over two months. Not long after, Sanetra was diagnosed with a heart condition that required surgery and limited her ability to work.

Despite the medical setbacks, Sanetra eventually was able to enroll in Antonelli College’s Legal Assisting program to pursue her goal of becoming a paralegal. She excelled academically and at her internship and was able to graduate from Antonelli College in 2011. After graduation, Sanetra sat for the National Legal Assisting Exam and became one of only 208 nationally certified paralegals in the state of Mississippi. Sanetra also succeeded in finding employment in her field, and currently works for a large insurance defense firm.

“Sanetra’s story is remarkable because of her dedication to furthering her education,” said Gunderson. “Her education at Antonelli College provided her with the flexibility she needed as a single mother, but it was her exceptional talent that made her a recipient of our GREAT Award.”

**Bambie Jordan** turned a medical challenge into a career opportunity.



Pictured from left to right: APSCU President and CEO Steve Gunderson, GREAT Award Winner Sanetra Hall, Ashley Pickens, associate director of student finance at Antonelli College.

After working at a factory job for 15 years, Bambie’s life changed forever when she was diagnosed with inflammatory breast cancer. She underwent a double mastectomy, chemotherapy, radiation, and a hysterectomy, and her recovery was slow and difficult. Ready to return to work after three and a half years of recovery, Bambie received word that the factory she and her husband worked at was closing down.

Bambie recognized that she needed career retraining and took advantage of an opportunity to enroll in YTI Career Institute’s Medical Assisting program. At YTI, Bambie impressed all who met her. She earned numerous academic honors, including the school’s most prestigious recognition, the President’s Award, before graduating in 2013. Bambie recently earned a full-time position at the medical office that performed her reconstructive surgery, where she strives to turn her own struggles into the inspiration for helping others recover and thrive.

“Bambie’s story embodies the spirit of the GREAT Awards,” said



Pictured from left to right: APSCU President and CEO Steve Gunderson, GREAT Award Winner Bambie Jordan, and President of YTI Career Institute Carla Horn.

Gunderson. “She took full advantage of YTI Career Institute’s academic programs and made quite an impression in the process.”

### **About the Association of Private Sector Colleges and Universities Mission**

The Association of Private Sector Colleges and Universities (APSCU) is a voluntary membership organization of accredited, private postsecondary schools, institutes, colleges and universities that provide career-specific educational programs. APSCU has about 1,400 members that educate and support over 3 million students each year for employment in over 200 occupational fields. APSCU member institutions provide the full range of higher education programs, including master's and doctorate degrees, two-



and four-year associate and baccalaureate degree programs, and short-term certificate and diploma programs.

APSCU member institutions cover the full gamut of postsecondary education: from short-term certificate and diploma programs, to two- and four-year associate and baccalaureate degrees, to master's and doctoral programs. Some of the occupational fields for which APSCU institutions provide programs include: information technology; allied health; business administration; commercial art; radio and television broadcasting; and culinary and hospitality management.

Most APSCU member institutions participate in federal student financial assistance programs under Title IV of the Higher Education Act. In order to participate, they must be licensed by the state in which they are located, accredited by a nationally recognized accrediting body, and approved by the U.S. Department of Education. Many APSCU member schools and colleges also participate in other federal, state and local education and workforce training programs.



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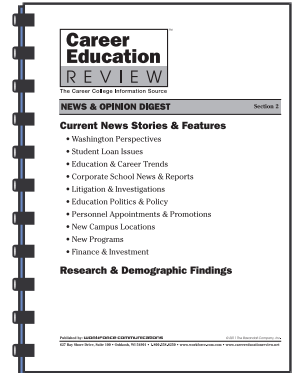
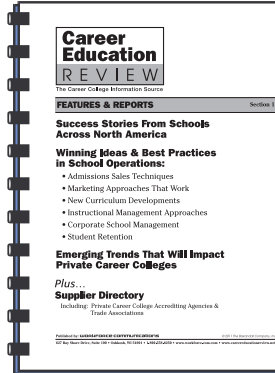
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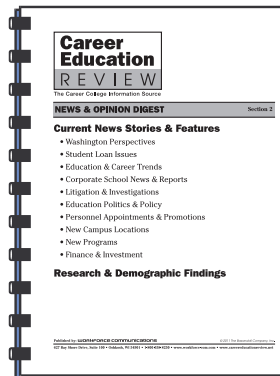
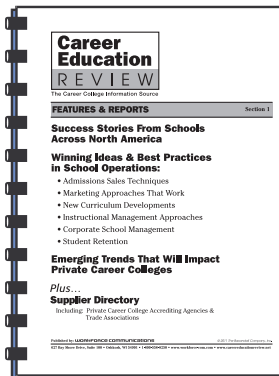
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