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"There's No Way a College Can Close": Student Experiences in a For-Profit Institution Closure

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“THERE’S NO WAY A COLLEGE CAN CLOSE”: STUDENT EXPERIENCES IN A
FOR-PROFIT INSTITUTION CLOSURE

BY

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DISSERTATION

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ABSTRACT

THERE'S NO WAY A COLLEGE CAN CLOSE?: STUDENT EXPERIENCES IN A FOR-PROFIT INSTITUTION CLOSURE

by

Jennifer M. Logsdon

University of New Hampshire, May 2018

Higher education in the United States has always been considered a pathway for individuals to achieve professional, personal, and socio-economic success. For-profit colleges claim that the for-profit sector provides a service to a demographic of the population neglected by traditional institutions. Since the enactment of neoliberal policy increasing the for-profit sectors participation in federally funded programs, there have been concerns raised regarding the impact of this sector on the lives of the students it serves. Additionally, as for-profit institutions struggle to adhere to federal guidelines, a number of institutions have closed their doors, making it necessary for students to find other options in order to continue their education. There has been little rich data collected on how students in the middle of their program fared after the school they were attending abruptly closed. This study focuses on the impact of policy decisions on student outcomes through a social justice lens. Using phenomenological methods, seven participants who were enrolled in a for-profit college during the time of its closure were interviewed. Findings showed the experiences of participants during the time of the closure. Findings also showed that participants bore positive impacts in their enrollment in the college including graduation, employment, and the ability to transfer to a traditional institution. Implications of findings suggest that regional accreditation, program accreditation, and history and reputation of the institution served as safeguards for student outcomes.

CHAPTER 1

INTRODUCTION AND LITERATURE REVIEW

This study is an exploration of the experiences of students enrolled in a for-profit institution of higher education that precipitously ceased operations. The study seeks to understand, from the student perspective, the events leading to the closure and the resources available to students during the course of the closure proceedings. Further, I seek to understand what factors influenced students' choices in continuing their education subsequent to the closure. The aim of this line of inquiry is to expand upon current research surrounding the for-profit higher education sector and to provide insight to the impact of education policy and institutional actions on the student experience, with the intention that the knowledge produced may contribute to policy that supports student transition during the process of an institutional closure. My hope is that this study will contribute to an understanding of the role of higher education policy through a lens of social stratification theory. An in-depth phenomenological methodology was utilized to interview the seven participants in this study. Participants represented a cross-section of students from various degree programs and class standings.

By examining the closure of a for-profit college we can gain a greater understanding of the processes and effects of policy implementation, with attention to the ways in which social justice is realized in institutions of higher education. This understanding is attained by investigating the experiences of students and considering how the data produced correlates to the intent of enacted policy and the claims of existing literature about the for-profit sector. Further, examining the effects of a closure provides a window into the contemporary political context of higher education policy, especially with respect to the perpetuation of social stratification.

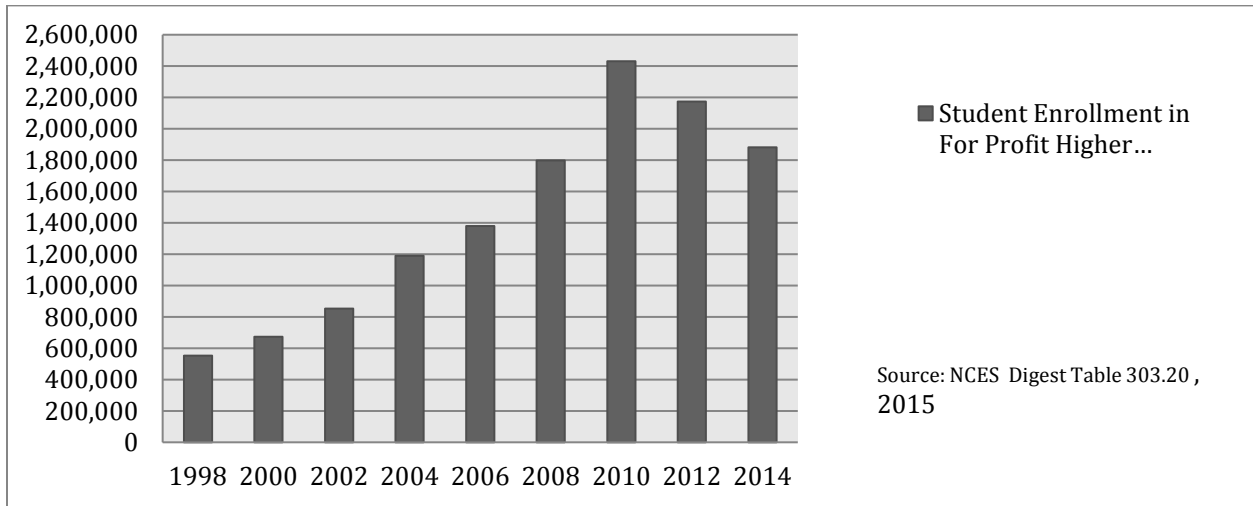
This chapter begins with a review of the literature on the for-profit sector drawn from multiple sources including journal articles, books, Internet sources, and government reports. This review will provide a brief description of the history of the for-profit sector, offering explanations for its rapid growth, and describing the debates between literature sources on both the merits of the for-profit sector and concerns of researchers regarding the for-profit education model. Literature concerning the social implications of for-profit education will be discussed, particularly regarding the demographics of enrolled students. Finally, a discussion of the findings of a government report and subsequent policy implementations enacted due to those findings will be explored, bringing context to this study, and providing a framework for its purpose.

History and Expansion of the For-Profit Sector in Higher Education

For-profit education has been a vital element in the training of skilled tradespeople throughout the history of the United States. Ruch (2001) describes that as early as 1660 Dutch settlers had established evening schools to teach general education for a fee, then included language education, finally expanding into job skills training. As the American education system started taking shape, colleges and universities focused on providing a classical education to the elite, while small for-profit schools offered the general population job skills training. The growth of the U.S. as a country expanded the need for agricultural and mechanical education, spurring the Morrill Act of 1862, and public colleges began offering programs beyond the traditional liberal arts education. Public education expanded further into vocational training with the Servicemen's Readjustment Act of 1944, which provided veterans with educational benefits after returning from World War II. Also known as the GI Bill, this policy not only grew the number of public higher education institutions, but diversified the student demographic (Adams, 2000).

However, during the 1990's the for-profit education sector experienced an enormous expansion with the development of multi-campus and multi-state corporate institutions (Kinsler, 2006). This expansion is explained by the 1996 decision of the U.S. Department of Education to redefine the criteria that allow higher education institutions to be eligible for Title IV funds (Ruch, 2001). New criteria allowed institutions to participate in Title IV programs if they offered associate's degrees or higher, their programs consisted of 300 clock hours of instruction, they were accredited through an agency recognized by the DOE, had a signed agreement with the DOE, and were in business for at least two years. Prior to this change, only institutions that were accredited as colleges by an organization recognized by the DOE could participate in Title IV Programs. With the changes to Title IV policy the DOE allowed schools that were both regionally and nationally accredited to participate in financial aid programs. Floyd (2007) states that for-profit institutions also fought the DOE successfully in order to loosen federal restrictions on financial aid for part-time and on-line students. For-profit institutions quickly changed what they offered to comply with DOE requirements, and investors in for-profit education could count on guaranteed federal grants and loans to secure their investments. Between 1998 and 2008, student enrollment in for-profit post-secondary institutions grew over 225 percent according to a 2010 report published by the United States Senate, from just below 600,000 students to 1.8 million students (U.S. DOE, 2010). Current data from the NCES shows the growth of the for-profit sector peaked in 2010 at just about 2.4 million students (Figure 1).

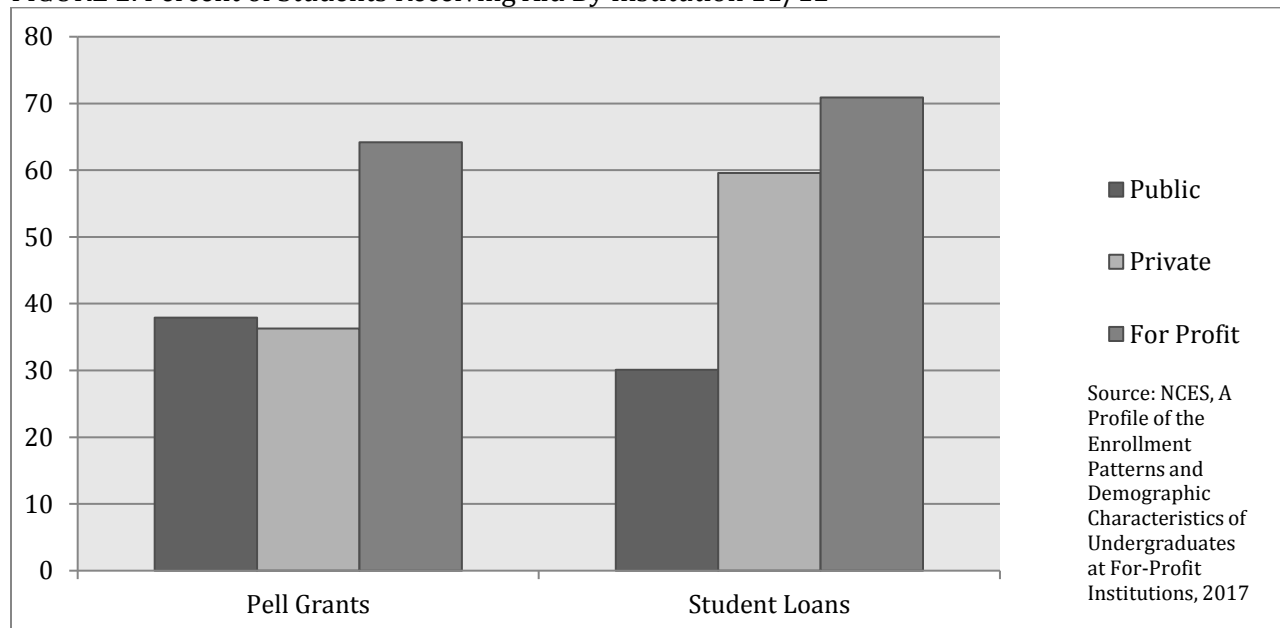
FIGURE 1. Student Enrollment in For-Profit Education



Cottom (2017) attributes the expansion of federal fund availability to the for-profit sector to the state of the economy and a poor labor market. She explains that the for-profit sector offered to provide credentialing to high-demand, high-paying jobs, around a schedule and timeframe that catered to the demanding lives of working people.

In 2011, of the number of students attending institutions of higher education, 12 percent were enrolled at for-profit schools (Tierney, 2011). According to the National Center for Education Statistics (2017), of the students enrolled in higher education during the 2011-2012 academic year, the percentage of students enrolled in for-profit institutions receiving Pell grants (64%) was higher than the percentage of students who received Pell grants in public (38%) or private (36%) institutions. When looking at student loans, 71% of students enrolled in for-profit schools received federal student loans, as opposed to 59% of students enrolled in private institutions, and 30% of students enrolled in public institutions (Figure 2). Ultimately, for-profit post-secondary education institutions were increasing revenue in direct relationship to the influx of federal tax dollars (U.S. Senate, 2012).

FIGURE 2. Percent of Students Receiving Aid By Institution 11/12



The For-Profit Debate

The majority of literature produced regarding the for-profit sector has been critical of its practices. However, literature also exists that supports aspects of the for-profit college model. The literature that finds positive benefits for for-profit institutions (or aspects of the for-profit model) generally finds that they are providing a service to students who are not otherwise being served by traditional non-profit institutions (Miller, Smith, and Nichols, 2011). Howard-Vital (2006) explains that students are drawn to for-profit schools because they create a welcoming environment and respond to potential student needs in an effective manner by helping potential students with admissions and financial aid paperwork. Floyd (2007) also identifies customer service as a strength of the for-profit model. Proponents of these institutions claim they are filling a gap left open by their not-for-profit counterparts by offering training programs, certificates and degrees for direct employment, in addition to the strong customer service exhibited in the for-profit model.

However, critics argue that for-profit institutions exploit low-income populations, leaving students in-debt and with questionable credentials (Cottom, 2017). Chung (2012) states that for-profit schools are regarded as taking advantage of students by some and as helping students find a way into the labor-market by others. Statistical data available through the National Center for Education Statistics (2017) identifies that low-income, minority students are enrolling in for-profit institutions. Enrollment of minority students in 2-year or less than 2-year programs at for-profit institutions is higher than enrollment of white students in these programs. The data additionally identifies students who attend for-profit institutions as acquiring more student loan debt than students who attend non-profit, public institutions.

Additionally, critics of for-profit post-secondary institutions have made claims of deceptive practices in student recruitment, concerns over student retention and graduation rates, and issues with student loan debt accrual. The research of Oseguera and Malagon (2010), reports from the Education Trust (Lynch, Engle, and Cruz., 2010) and the U.S. Senate (2014) are critical of the purpose, student recruitment processes, and business practices of for-profit institutions, as well as the overall question of whether or not government funds should be used to support corporations. Tierney (2011) has written about for-profit institutions, but states, as do the majority of researchers, that there is not enough data on student outcomes to accurately assess whether or not for-profit colleges are providing a resource that is beneficial to the students they serve.

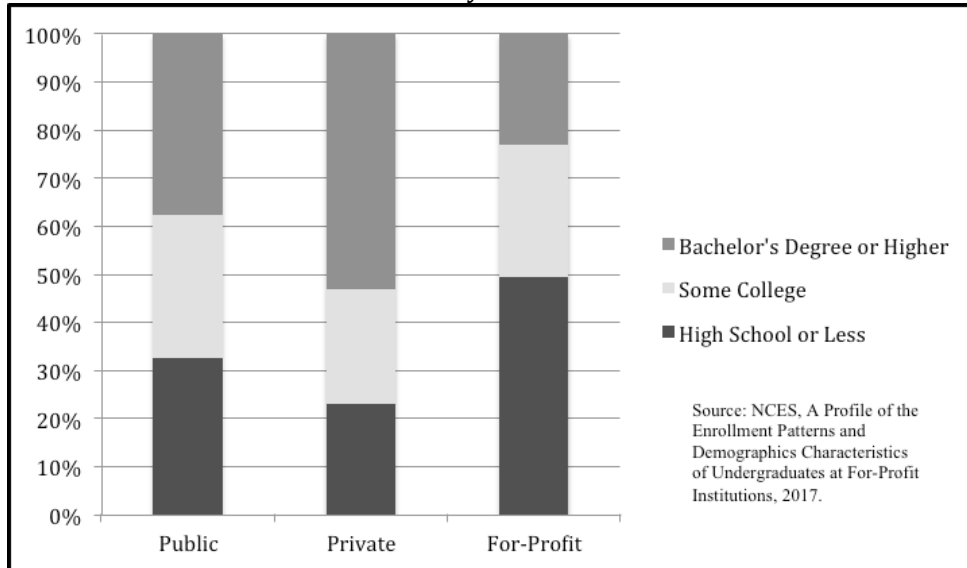
Social Implications of For-Profit Education.

Current research has identified the demographics of students who attend for-profit postsecondary institutions quite clearly. In his social analysis of for-profit education, Beaver (2009) identifies the specific types of students who enroll in these institutions; older (over 30),

non-traditional students, and students from economically disadvantaged backgrounds.

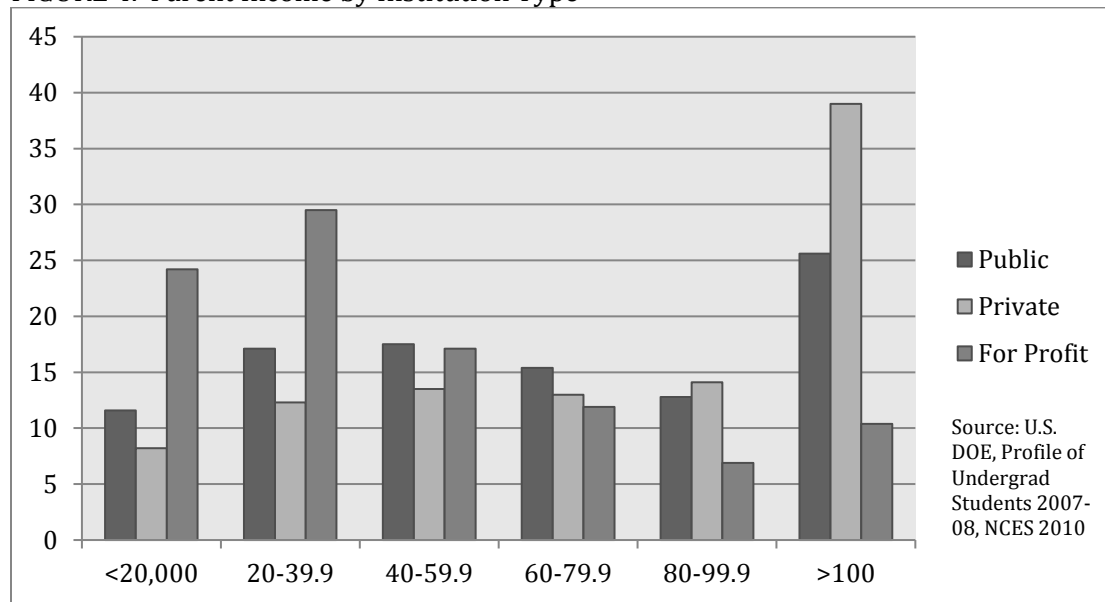
Compared to non-profit institutions, a greater percentage of students (about 50%) who enroll in for-profit institutions have parents whose highest education attainment level is a high school diploma or less (Figure 3).

FIGURE 3. Parents Education Level By Institution



Additionally, around 50% of students who attend for-profit institutions are low-income, and about half of all students enrolled are minority (U.S. Senate, 2010). In her research, Chung (2012) examined students enrolled in U.S. for-profits using data from the National Center for Education Statistics (NCES) of the Department of Education, surveys of which provide the only source of nationally-representative data of students enrolled in for-profit institutions. Chung (2012) describes students enrolled in for-profit colleges as “more likely to be female and much more likely to be non-white,” as well as being economically disadvantaged. As shown in Figure 4, parents of students who enroll at for-profit institutions are more likely to have lower incomes than their counterparts at non-profit institutions. Students who enroll in for-profit postsecondary schools also are more likely to hold a GED than their non-profit counterparts (Chung, 2012).

FIGURE 4. Parent Income by Institution Type



Social stratification theorists have stated some important considerations that may be applied to specific demographic data regarding students enrolled in the for-profit education sector. The student demographics of for-profit institutions suggest an unequal distribution of students from backgrounds with limited resources. Students lack not only financial resources, but resources that contribute to informed decision making regarding choice of higher education institutions. The concept of higher education is not foreign, and certainly not as mysterious, to students from backgrounds rich in cultural capital, thus making them better equipped to manage the educational landscape (Lareau, 2011).

However, Cottom (2017) argues that lack of knowledge regarding the type of institution that students are choosing to enroll in is not necessarily the issue, as is the quality of credentials and the inherent social stratification of the labor market. In her view, those who enroll in for-profit institutions are seeking credentials to gain or maintain employment. Cottom also maintains that within a labor market in which wages are low and lay-offs are common, workers feel as though they need to acquire more credentials to obtain, or maintain, employability. While students who enroll in for-profit institutions feel that they are investing in their future, they are

acquiring debt along with questionable credentials in a labor market that is not creating a return on tuition investment. When looking at for-profit college data, Deming, Goldin, and Katz (2013) state that students enrolled in for-profit colleges were more likely to be unemployed than their community college counterparts, and are paid less when they do obtain employment. Further, in a six year study on labor market returns and transfer students, Liu and Belfield (2014) concluded that transfer students who had attended only public and private non-profit institutions earned more than transfer students who had ever been enrolled in a for-profit institutions, and were more likely to be employed.

The Harkin Report Findings.

In 2012, the U.S. Senate released a report containing the results of a 2-year investigation, led by Senator Tom Harkin, into the for-profit education industry. The practices of thirty for-profit education corporations nationwide were investigated, focusing both on the practices of for-profit schools and the financial burden placed on students who attended these institutions. The report claimed that for-profit institutions spent more than their non-profit counterparts on marketing/recruitment, executive salaries, and lobbying efforts. When the 30 companies were examined together, it was found that almost a quarter (22.7%) of all revenue was spent on marketing and recruitment efforts in 2009, and about \$2050 per student on instruction. Comparatively, the non-profit schools spent around one percent of their budget on marketing and on average \$5000 per student on instruction (U.S. Senate, 2012). The report called the recruitment practices of many for-profit schools “deceptive” and “aggressive.” Some recruiters were making multiple phone calls to potential students, “selling” programs and pressuring them to enroll. Essentially these recruiters were salespeople whose jobs depended upon the number of students they were able to enroll. Financial incentives such as bonuses were also awarded to high

performing recruiters at some schools. Students and undercover investigators reported receiving misleading information from recruiters, ranging from the length and costs of programs to exaggerated job prospects and salary figures. In addition to these marketing and recruitment tactics, the report found that schools targeted non-traditional potential students, and recruiter-training manuals encouraged employees to focus on the weaknesses of potential students, such as those with dead-end jobs or low socioeconomic status, in an effort to push them towards enrolling in programs. Seemingly, non-traditional students were the focus because of their eligibility for federal aid, but also their lack of knowledge about higher education.

The Harkin Report also investigated student withdrawal rates from 16 for-profit institutions and found that 57% of students who enrolled in these schools between 2008 and 2009 withdrew from their programs. As the report claims that the majority of for-profit schools are more expensive than their non-profit counterparts, 95% of students who enrolled in for-profit schools in 2007 received student loans compared to only 17% of students from community colleges and 44% of students at public institutions (U.S. Senate, 2010).

Report findings regarding student debt which are particularly troubling include:

Most for-profit colleges charge much higher tuition than comparable programs at community colleges and flagship State public universities. The investigation found Associate degree and certificate programs averaged four times the cost of degree programs at comparable community colleges. Bachelor's degree programs averaged 20 percent more than the cost of analogous programs at flagship public universities despite the credits being largely non-transferrable (p.3).

Because 96 percent of students starting a for-profit college take federal student loans to attend a for-profit college (compared to 13 percent at community colleges), nearly all students who leave have student loan debt, even when they don't have a degree or diploma or increased earning power (p.7).

Students who attended a for-profit college accounted for 47 percent of all Federal student loan defaults in 2008 and 2009. More than 1 in 5 students enrolling in a

for-profit college-22 percent- default within 3 years of entering repayment on their student loans (U.S. Senate, 2012 p.8).

Repercussions of the Harkin Report.

In 2015, after the release of the Harkin Report the Department of Education began more closely scrutinizing the for-profit industry and sanctioning for-profit corporations who were not in compliance with Title IV requirements. Multiple media outlets reported on for-profit institutions investigated for fraud, two of the largest being ITT Education Services and Corinthian Colleges. Corinthian Colleges was accused of pressuring students into high interest loans, along with predatory recruitment practices and inflating job placement numbers (Rooney, 2015). In May 2015, after being fined 30 million dollars by the Department of Education for inflating the job placement rates of graduates, Corinthian Colleges closed its 28 campuses and declared bankruptcy. Sixteen thousand students were enrolled in Corinthian Colleges when the campuses closed. In October 2015, ITT Education Services, charged with similar fraudulent behavior, was provided a letter from the Department of Education, threatening sanctions unless the corporation followed procedures outlined by the DOE. In September 2016, ITT Education Services declared bankruptcy and closed all 130 campuses at which 40,000 students were enrolled (Smith, 2016). In a September press release (Appendix A) ITT called the actions of the government “inappropriate and unconstitutional” and blamed the government sanctions for the loss of jobs for over 8,000 employees. Students from Corinthian Colleges and ITT Education Services were offered student loan debt relief from the DOE, because of the predatory practices of both corporations. The participants in this case study were enrolled in a college owned by ITT Education Services when they declared bankruptcy. The following letter (Figure 5) to ITT students was posted on the official blog of the U.S. Department of Education in September of 2016 (<https://blog.ed.gov/2016/09/message-secretary-education-itt-students/>):

FIGURE 5. Message to ITT Students from the Secretary of Education

Dear ITT student,

Today, ITT Educational Services, Inc. (ITT) announced that it is closing all of its ITT Technical Institute campuses. For most of the world, that news will be covered as a business story or a political one, but I know that for you it is deeply personal. You are probably wondering what this means for your future; how it is going to affect your finances and your ability to continue your education.

In recent years, ITT has increasingly been the subject of numerous state and federal investigations. In August, ITT's accreditor, the Accrediting Council for Independent Colleges and Schools (ACICS) determined that ITT "is not in compliance, and is unlikely to become in compliance with [ACICS] Accreditation Criteria." This came amid increasingly heightened financial oversight measures put in place by the Department over the past two years due to significant concerns about ITT's administrative capacity, organizational integrity, financial viability, and ability to serve students.

The school's decisions have put its students and millions of dollars in taxpayer-funded federal student aid at risk. Last week, the Department of Education took oversight actions to prevent ITT from continuing to add to that risk. When we made that decision, we did not take it lightly. One possible outcome of oversight actions is that a school may choose to close rather than take corrective actions, which can cause disruption and disappointment for current students. Ultimately, we made a difficult choice to pursue additional oversight in order to protect you, other students, and taxpayers from potentially worse educational and financial damage in the future if ITT was allowed to continue operating without increased oversight and assurances to better serve students.

We are committed to helping you as you consider next steps. Most immediately, you have two basic options to choose between:

1. If you are currently or were recently enrolled at ITT, you may be eligible to have your federal student loans for your program at ITT discharged. Your federal loan debt will be wiped away and you will have the option of restarting your education somewhere new. We will post and update information about how to receive a discharge at our [ITT announcements page](#).
2. If you wish to continue and complete your program at a different school – especially if you are close to graduating – you may be able to transfer your credits. It is important to note that transferring your credits may limit your ability to have your federal loans discharged. Closed school discharge may be an option if you enroll in a different program that does not accept your ITT credits.

Both of these options have pros and cons, depending on your unique circumstances, so it is important that you consider your specific situation carefully. You can find some information to start with at our [ITT announcements page](#). The Department's Office of Federal Student Aid is ready to support you with resources and information, including through this website, and will be updating you with more information in the coming days and weeks.

Whatever you choose to do, do not give up on your education. Higher education remains the clearest path to economic opportunity and security. Restarting or continuing your education at a high-quality, reputable institution may feel like a setback today, but odds are it will pay off in the long run. There are people and tools – like our [College Scorecard](#) – out there to help you pick a program that gives you a real shot at success.

I am proud of your hard work and dedication, and we will do all we can to continue to provide information to you on your options.

Sincerely,

John B. King Jr., U.S. Secretary of Education

This study focuses on a college owned by ITT Educational Services. Daniel Webster College, founded in 1965, had previously been a non-profit, private institution until ITT Educational Services purchased the school in 2009. It is important to note this history, which will be further explained in chapter four, because before being acquired by ITT Technical Services, Daniel Webster College had been well respected for its aviation program and therefore a trusted name in the surrounding community. Thus, the demographics of students enrolled in Daniel Webster College did not wholly reflect the demographics of for-profit institution students identified in previous research on for-profit colleges. However, with the increasing number of recent for-profit school closures, it is imperative that there is a basis for understanding what occurs, from a student perspective, when a school closes, so that steps can be taken to effectively support the students involved.

Summary

The for-profit higher education industry has grown exponentially over the last few decades, and with this growth the sector offered not only technical programs, but also academic degrees at both the undergraduate and graduate level. Research (U.S. DOE, 2010) has identified the demographics of students enrolled in for-profit colleges, and attempts have been made to understand student choice of for-profits over non-profit institutions. Some literature (Lynch, 2010) has focused on the financial ramifications on students attending for-profit institutions who receive financial loans to attend school, and has raised questions regarding student ability to repay loan debt. The marketing practices of for-profit schools have been critiqued in government reports and literature, as have enrollment and financial aid processes (U.S. Senate, 2010, Oseguera & Malagon, 2010, Lynch et al., 2010).

A review of the literature on the for-profit higher education sector literature poses concerns regarding the viability of the for-profit model of education, but reveals many gaps in the current literature. First, the term “for-profit” is used very generally. The types of institutions that fall under the “for-profit” umbrella are very diverse. Degrees range from certificates for direct employment to doctorates. Some schools are focused on just one area of technical education; others offer various technical degrees, while others are focused more towards academic areas of study, offering bachelors and graduate degrees. It is not feasible to understand a whole sector of education based on such varying criteria. Secondly, just as the industry itself is diverse, so are the students choosing for-profit schools. The student enrolling in a master’s level program at the University of Phoenix may differ from a student enrolling in a technical college. More research is needed to understand the various types of for-profit institutions and the particular students they serve to understand the effects of for-profit enrollment on students. Additionally, implications of social justice issues surrounding the for-profit sector are evident in the literature but are not fully explored due to the generalization of the for-profit sector by researchers and government reports.

After the release of the Harkin Report (2012), scrutiny of for-profit institutions by legislators led to sanctions, causing some institutions within the for-profit sector to close, leaving students unable to complete the programs in which they enrolled. Data from National Center for Education Statistics (Appendix B) on the number of for-profit school closures occurring in recent years shows that 49 for-profit degree-granting post-secondary institutions closed their doors in 2014-2015, a dramatic increase from previous years. In May of 2017, the Federal Reserve Bank of Philadelphia released a study examining the effects of sanctions on for-profit colleges in the 1990s. The study showed that when sanctions led to a school closure, students turned to

community colleges to continue their education. However, the study also points out that a lack of public support for community colleges in recent years has decreased the capacity of colleges to enroll students (Cellini et al., 2017).

In reviewing the literature on the for-profit education sector and realizing the current state of for-profit education, I draw the assumption that higher education policy stemming from loosening restrictions on Title IV funding and subsequent sanctions on the for-profit sector is perpetuating social stratification and failing the student constituency. This study sought to explore the experiences of students enrolled in a for-profit college leading up to its closure, in hopes of better understanding the impact of a closure on students. It examined how the participants perceived the closure, their experiences throughout the process of the closure, and issues they experienced in transferring to a new institution, along with how they chose an institution in which to transfer. However, in exploring how students perceived a closure, I anticipated a broadened understanding of the for-profit sector and the impact of policy decisions on higher education institutions. This purpose emerged from the need to gain a better understanding of the for-profit sector, reactive policy implementation surrounding the sector, and the social justice implications emerging from higher education policy enactments.

CHAPTER 2

CONCEPTUAL FRAMEWORK

In the previous chapter the literature on for-profit higher education was presented, including a brief history of the sector, a discussion of the growth of for-profit corporations and their student demographics, and the effects of the most recent policy decisions surrounding the for-profit sector. I introduced social stratification theory into the discussion as a lens with which to view higher education policy and for-profit education, and presented literature discussing the ties between the for-profit sector, issues with social justice, and the perpetuation of social stratification. I chose to utilize a framework of social stratification theory and social justice for this dissertation due to the movement of higher education towards a seemingly more capitalist ideology with policy supporting the privatization of colleges, the neoliberal ideology driving current education policy, and the lack of rich data on the impact of these ideologies on the students most affected by policy. Framing my research through social stratification theory brings the focus back to the student as a stakeholder in policy decisions. Throughout the literature on for-profit education, whether that literature poses for-profit education in the role of antagonist or champion to student, the demographic of underserved student remains consistent. This drew the assumption that underserved students are the recipients of the effects of both government policy and for-profit sector implementation of that policy, also shaping the critical framework of this study. With the stated assumption, the measurement of the effectiveness of policy is based on the results produced from both the policy and its implementation (Figure 6).

FIGURE 6. Effects of Policy and Policy Implementation



According to Maxwell (2013, p.64) along with existing theory and literature, the experiential knowledge of the researcher can be utilized in the development of a conceptual framework. With that, I called upon my seventeen years of professional experience working with underserved college students to shape this study.

This chapter will discuss the concepts framing the design of this study. While the literature on the for-profit sector informed the study, the policy shaping the current state of higher education and social justice implications of the policy trends surrounding the for-profit sector are equally important to its framework. I will start the chapter with an exploration of the privatization of higher education, followed by an exploration of past policy that aided underserved students, and end with a discussion of the current political ideology driving educational policy.

Privatization of Higher Education

Kingdon states (2011) that in order for policy to be enacted, the problem stream, policy stream, and politics stream need to come together at the right time. In her discussion on the rise of the for-profit sector, Cottom (2017) explains how economic and labor market conditions presented opportunity for policy that spurred the growth of for-profit institutions. She describes

how the new economy changed the labor market so that companies assumed less responsibility in the training of workers, and less responsibility in providing benefits to employees. Workers are responsible for seeking out training and certification that keep them employable, and they are seeking training across industries, trying to keep up with perceived labor market demands. The political focus of education became workforce training under this economic model, and that focus paved the way for the for-profit sector to lobby for access to Title IV programs. In reviewing the literature, most specifically the Harkin Report (2012), the policy driving the privatization of higher education along with the implementation of that policy failed the students who enrolled in the for-profit sector (Figure 7). Policy loosened Title IV restrictions, the for-profit sector grew and investors profited with the implementation of that policy, and students who had enrolled in the for-profit sector were misled about the benefits of enrollment, i.e., career paths and salaries, and acquired useless educational credits and debt.

FIGURE 7. Privatization Policy and Policy Implementation



Neoliberal Ideology and Higher Education

Privatization of public goods and services has become a fundamental tenet of neoliberal capitalist ideology, which supports the free market over any other interests. Neoliberalism theory alleges that privatization and market deregulation will provide maximum social good, and

thereby focuses expanding corporate interests (Saunders, 2007). The privatization of higher education has had ramifications, and the consequences have had the greatest impact on those of lower socio-economic standing, the demographic eligible for the most Title IV funding for educational expenses (U.S. Senate, 2012; Deming et al.; 2013, Cottom, 2017). When the Harkin Report was released for-profit schools chose to declare bankruptcy and close rather than adjust to the demands of the Department of Education. Reactive policy produced by the Harkin report findings negatively impacted the students enrolled in failed for-profits (Figure 8), as sanctions and the resulting closures left students with debt and without an institution to complete a degree.

FIGURE 8. Sanctioning For-Profit Colleges and Implementation



Free-market advocates looked at the sanctions on for-profit schools as a means to stifle the market, while the Department of Education claimed they were trying to protect the federal investment in higher education by sanctioning for-profit institutions found to be engaging in questionable practices, and attempted to rectify student debt through loan forgiveness programs. Unfortunately, the Department of Education stopped processing applications for student loan debt forgiveness with the appointment of a new Secretary of Education under the current presidential administration in February 2017, an administration that unequivocally supports

neoliberal ideology. Under this ideology exists a disregard for the outcomes of policy on the student, as the assumption is the market will adjust for the good of society in every circumstance.

Cultural Hegemony and Social Stratification

Given the movement of higher education towards a more corporate/capitalist ideology with a focus towards workforce education, this study was grounded in a framework rooted in Marxist Humanist theory, particularly the work of Antonio Gramsci around cultural hegemony. Contradictory to neoliberalism, Gramsci theorized the state would prosper both socially and economically through the empowerment of the working class. In Gramsci's theory of cultural hegemony, the dominant class creates cultural norms that, while meeting the minimum needs of the masses, ultimately serve the interests of the dominant class (Gramsci, 1968). Policy towards the privatization of higher education was driven by the economic and labor market conditions that Cottom (2017) describes, conditions that served corporate interests as they were relieved of the responsibility of providing workers job stability, training and other benefits. The student/worker constituency took these conditions as cultural norms and demanded more ways of obtaining credentials to maintain employability in the labor market, a demand that aided policy towards privatization. While the privatization of education was portrayed as a solution to the unmet needs of the workforce, it is essentially reinforcing the cultural hegemony created by neoliberal capitalist labor markets.

In this study I use a social justice lens based in social stratification theory to counter the neoliberal capitalist ideology that spurred the growth of for-profit education. Social stratification theory is an appropriate counter hegemony due to the demographic of student identified in research on for-profit colleges, and the questionable impact that education policy is having on this demographic according to prior research (U.S. Senate, 2012; Deming et al, 2013; Arbeit,

2017). The framework of neoliberal ideology absolves the private sector from social responsibility and places all of the responsibility for success on the consumer, the consumer being the student. Neoliberal ideology does not consider the lack of resources of underserved students identified in social stratification theory, nor does it consider the social justice issues that may arise from this lack of resources. While cultural hegemony establishes the status quo, social justice issues between classes maintain the status quo. Deming et al. (2013) state that students who enroll in for-profit colleges “tend to be in more precarious financial situations than their counterparts before they enroll (p. 142)” which contributes to the higher student loan default rates and unemployment numbers associated with for-profit college students. If students are enrolling in for-profit colleges to gain credentials that lead from one low-paying job to another, as Cottom (2017) contends, the status quo is being maintained by the inability of students to gain social mobility or financial security from their efforts to gain credentials. The closures of for-profit schools have contributed to the consequences of the privatization of higher education by limiting the options of students to continue their education after a closure. Educational credits from for-profit colleges are not usually accepted by traditional institutions (Harkin, 2012; Deming et al., 2013) leaving students unable to transfer credits if they wish to enroll in a traditional institution after a closure. Thereby, the effects of neoliberal policy and policy implementation towards the privatization of higher education did not contribute to the good of the masses, nor the empowerment of the worker, but rather contributed to the perpetuation of social stratification.

Despite claims by the for-profit sector to the contrary, public institutions have provided educational opportunities to underserved students. These opportunities, fueled by policy support, provided students the means to expand obtain the educational degree or certificate needed to

enter the workforce, and served as a pathway into traditional education for students who desired to follow that path.

Policy Support for Underserved Students

Existing federal policies supporting the recruitment and retention of underserved students in higher education demonstrate an understanding of the needs of these students. TRIO and the Carl Perkins Act are examples of policy successfully implemented by non-profit institutions of higher education providing benefits to underserved students. Both policies are an example of a hegemony which empowers the working class through education and contribute to the public good.

TRIO is a federally funded group of programs tasked with assisting non-traditional student groups to access and obtain higher education credentials. TRIO was created in 1968 as part of President Johnson's War on Poverty, to expand access to higher education for low-income students, and attempt to close the income gap between socio-economic groups. While initially created to assist low-income students, TRIO programs throughout the years have expanded, and students considered "non-traditional" under TRIO guidelines currently are first-generation, low-income, students of color, veterans, and disabled students. TRIO was created in the 1960's, during a time that was perfect for all three of Kingdon's (2011) streams to meet and pass through the policy window. Johnson had declared a war on poverty, the Civil Rights Movement was in full swing, and people wanted equality and change. Visible participants of TRIO policy were the President, Congress, and civil rights leaders who were stressing the importance of education and equality for the masses.

The legislative intent of TRIO programs was to increase access to higher education to underserved students. This intent was originally focused towards low-income students, but with

amendments to the Higher Education Act of 1965, was expanded to include first-generation students, minority students, disabled students, and veterans. Private and public institutions are both eligible to apply for federal TRIO funding, and must have experience serving TRIO eligible students. Ultimately, TRIO programs are meant to give students the resources that support them in achieving a college education.

According to several national studies conducted by the U.S. Department of Education, there have been many positive effects of TRIO policy and its various programs. Here are some of the most notable from those studies (The Pell Institute, 2009):

- Talent Search students in Florida were 20% more likely than similarly qualified peers to graduate from high school.
- Talent Search students in Florida were 42% more likely to enroll in a public college right after graduation.
- Talent Search students in Texas were 52% more likely to enroll in a public college right after graduation.
- Upward Bound students are 50% more likely to attain a bachelor's degree (as compared to control group).
- Upward Bound Math and Science students were 44% more likely to enroll in selective 4-year colleges (as compared to control group).

Workforce Education Policy

Since concerns regarding workforce education influenced policy towards privatization (Cottom, 2017), it is important to acknowledge the Carl D. Perkins Act. I discuss an incorporation of this policy in Nevada as an example of successful policy and policy implementation aimed towards workforce education due to my professional involvement with a program stemming from the Carl D. Perkins Act. In my role as Assistant Coordinator for the Tech Prep Program at the College of Southern Nevada, the largest community college in Nevada,

I worked directly with the Nevada Department of Education on policy implementation of career and technical education (CTE) programs throughout the state. According to Arbeit et al. (2017), 93% of students enrolled in for-profit colleges are enrolled in career and technical education (CTE) programs, compared to about 63% of students at public and 61% of students at private nonprofit institutions, reinforcing the necessity of examining this policy.

In 1985, the Nevada legislature approved Assembly Bill 131, which authorized public schools to work jointly with each other and business and industry to expand career and technical education programs in the state of Nevada. The reauthorization of the Carl D. Perkins Vocational and Technical Education Act in the previous year made funds available to states for career and technical education. The impetus for this included great economic growth in the U.S. and President Reagan's call for stronger education of the workforce in order to compete with international markets. Higher education was tasked with creating a workforce able to compete on a global scale. Hence, the problem stream, the policy stream, and politics stream combined at the right time for policies for CTE policies to be passed nationwide (Kingdon, 2011).

The Tech Prep Program in Nevada is a 2+2 program. The colleges and secondary schools work together with business and industry to develop articulation agreements. Students can take CTE courses in high school as juniors and seniors, and receive both high school and college credit for the courses. Students can graduate with up to 15 college credits, which can be counted towards an associate's degree at the awarding institution. College faculty work closely with secondary teachers to ensure the curriculum of courses meets college standards, and program committees are organized for each of the program areas. Business and industry leaders are appointed to committees to ensure that the curriculum is meeting the needs of the private sector. Dual enrollment courses are offered in the areas of agriculture and natural resources, business

and marketing, family and consumer science, health science and public safety, information and media technologies, and skilled and technical sciences. In my position with the Tech Prep Program, I was often asked to present the program in CTE classrooms. I built rapport with many underserved students, and provided guidance on college processes such as admissions and financial aid. I was able to expand their knowledge on higher education and offer a resource that they had previously lacked, which helped build the habitus Lareau (2011) spoke of in her work. Students obtained college credits in high school and were able to transition into college after graduation if they chose.

The legislative intent of the Career and Technical Education Act was to strengthen the workforce of Nevada through the expansion of career and technical education in secondary schools. Building a skilled domestic workforce that could compete with overseas markets was a nationwide concern that was being address by individual states through CTE legislation. The integration of business and industry into this act was to ensure that educational institutions were providing the skills needed in the workforce. The combination of secondary school faculty, post-secondary school faculty, and business and industry would support the rigor of the curriculum, and ensure the proper skill set is provided to prepare students for success in the workforce.

According to a 2011 report released by the Nevada Department of Education there are some noticeable gains from Career and Technical programs in the state of Nevada. While enrollment has remained constant over the past 5 years (about 47% of secondary students enrolled in one or more CTE courses), daily attendance rates of CTE students were about 1.2 percent higher than overall attendance rates (NDOE, 2011). The report also showed that CTE students scored higher in math, reading, and writing assessments compared to other students, 2 to 6 percentage points higher on average. The report attributes the higher scores to the “practical

application of math skills to solve real world problems; the reading of technical manuals and following written instructions in project-based lab assignments; the use of writing skills to compose business letters and other correspondence and demonstrate all-around communication skills in simulated work-based learning environments (NDOE, 2011, p. 3).” The most noticeable gain in the Nevada Department of Education Report (2011) was the graduation and dropout rates of CTE students compared to all students. In the 2007-2008 school year the graduation rate for CTE students was 72% compared to 68% for all students, the following year the CTE rate remained constant, but the overall student rate increased by 2 percentage points, the report did not explain the increase in the overall graduation rate. The report also shows that the dropout rate for CTE students has remained consistently lower than that of overall students by almost 2 percentage points, from 2.8 and 4.7% in 2007-2008 to 2.6% and 4.2% in 2008-2009, respectively. Overall, Career and Technical Education appears to have led to positive gains for public education in the state of Nevada.

Many positive consequences have occurred from the CTE Act, both for students and higher education institutions. For institutions, the connection with business and industry has extended beyond CTE. Partnerships have been formed that include current employees furthering their training, and higher education has opened up to a new segment of the population. The partnerships between secondary schools and higher education have also contributed to the departments working together on new programming that involves service learning and mentoring between students at each institution. Further, Tech Prep programs have been able to provide the type of support needed by underserved students to enroll in higher education programs. Academic opportunities open up to students beyond career and technical education. These

students are able to gain a better understanding of the culture of higher education, an understanding that gives incentive to fully participate in their education.

The TRIO and Carl Perkins Acts promote equal access to higher education for the student demographic that for-profit institutions claim are ignored by traditional institutions. Deming et al. (2013) point out that students enrolled in for-profit schools are more likely to complete an associate degree program (54%) than their community college counterparts (42%), however, explain that some community college students will transfer into a bachelor's degree program before completing their associate's degree. TRIO and Carl Perkins policy demonstrate both an understanding of the barriers that underserved students face in higher education and provide solutions to overcome those barriers in ways that promote equal access to traditional higher education for underserved students. Additionally, these policies and their implementation have allowed underserved students to obtain degrees or certificates that can be used in the workforce and allowed students who wished to further their education the opportunity by providing them transferable credits through regionally accredited institutions (Figure 9).

FIGURE 9. Underserved Student Policy and Implementation



Conclusion

In framing this study I discussed the policy surrounding the growth of the for-profit education sector and the consequences of policy implementation. I also discussed the neoliberal political ideology contributing to policy that spurred the growth of the sector and is continuing to impact students. The focus of neoliberal policy is to provide benefits to the private sector, and assumes that society will benefit from unregulated markets. This assumption was refuted with the findings from the Harkin Report that revealed unscrupulous practices within the for-profit sector. However, it was not only neoliberal ideology that contributed to negative consequences for students. Reactive policy stemming from the Harkin Report led to sanctions within the for-profit sector, colleges closed and students were left without an institution and responsible for student loan debt. In the examination of policy trends involved with the privatization of higher education since the initial decision to expand Title IV funding to the for-profit sector, underserved students are bearing the brunt of policy decisions. For-profit institutions can declare bankruptcy while the DOE is no longer processing student debt-relief applications, which is indicative of neoliberal policy.

I chose view this study through a lens that considers the impact on the student as an integral part of policy effectiveness. I discussed two federal policies whose intent supports the theory that the empowerment of the masses benefits society and the economy. These policies served as examples of the effective policy that projected an understanding of the needs of underserved students. In this study I examine a school closure from the student experience, since it is the missing viewpoint on the impact of policy and policy implementation concerning the privatization of higher education.

CHAPTER 3

METHODS

This study is centered on the perceptions of students who were enrolled in a for-profit institution of higher education, Daniel Webster College, in the semesters prior to the institution's closure. I'm interested in how the students perceived the closure, and how it impacted them academically, financially, and personally. DWC was not the typical for-profit institution identified in the existing literature, nor did its students meet the typical demographic profile of students enrolled in the for-profit sector. However, there is a good story to be told about the school closure from the perspective of the student. While this study cannot be used to make generalizations about for-profit school closures, it verifies the complexity of the for-profit education sector, and explores the impacts of a closure on a particular group of students. Additionally, this study validates the claim made in the previous, limited research on for-profit schools that more research needs to be conducted to understand not only the impact of the for-profit sector on enrolled students, but on how neoliberal policy is affecting the landscape of higher education in the United States.

Chapter Overview

In this chapter I will discuss the design of my study, the methodology utilized, and provide rationale for the method used to collect and analyze data. I chose to conduct a qualitative study of students who had been enrolled at Daniel Webster College during the semesters leading up to the school's closure, utilizing a phenomenological approach to data collection, as the purpose was to understand the experience of the student and the impact of the closure on each participant. Using this approach, I was able to conduct in-depth interviews with each participant,

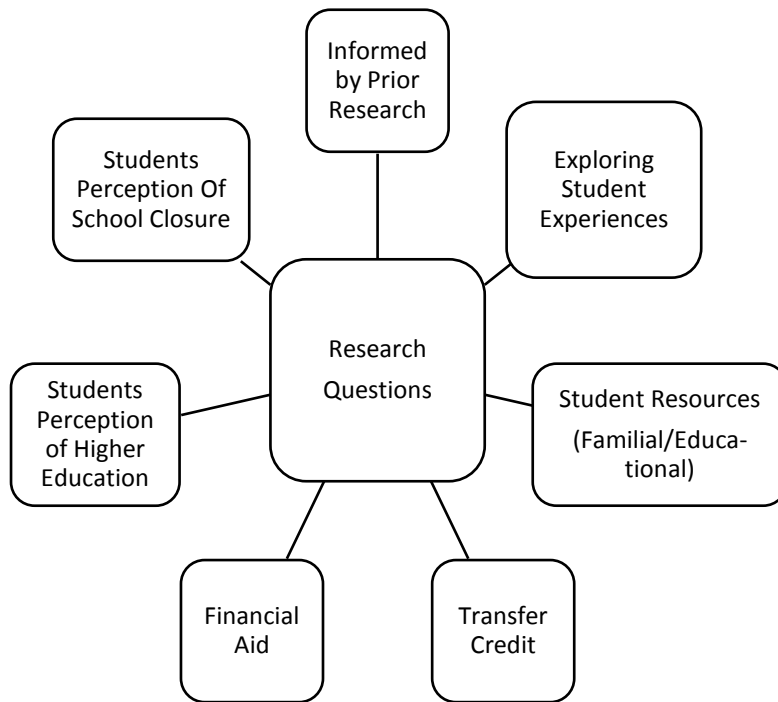
and gain an understanding of the events leading up to the school closure from the student perspective, individual issues that arose for each participant, and how participants fared upon resolution of those issues.

I will present my primary and secondary research questions, providing brief explanations of the relevance of these questions. I will justify my research methodology by citing academic works on qualitative research, and more specifically, the phenomenological approach to data collection. I will discuss data collection, and how my target group evolved due to the distinct characteristics of Daniel Webster College. Finally, I will describe the data analysis, ethical considerations, and limitations of my study.

Research Questions

This study explores the phenomenon of a for-profit college closure from the perspective of enrolled students. My primary research question examines the perceptions and experiences of students in regards to the closure of Daniel Webster College. I wanted to understand how students perceived the process of the closure, and how they were impacted, if they were impacted, by what transpired at Daniel Webster College. I also wanted to explore some of the topics identified in prior research, specifically financial aid and transfer credit issues, and see if students experienced issues in these areas. Additionally, I wanted to understand what students perceived as their resources throughout the closure (Figure 10).

FIGURE 10. Research Question Development



Due to the lack of research on the for-profit sector and for-profit school closures, particularly from the perspective of the student, the data generated from these questions will provide much needed information regarding this phenomenon, particularly considering the increased frequency that institutions have been recently closing.

Primary Question: How did students of a for-profit institution of higher education perceive and experience the institution’s closure?

Secondary Questions:

SQ 1: How were students notified of the school closure?

SQ 2: Were students offered support to transition to a new institution?

SQ 3: Did students have any issues with their financial aid or transfer credits due to the school closure?

SQ 4: What influenced the decision of the students to choose the institution they transitioned into to complete their degree?

My first secondary question gave me a foundation for understanding the environment at Daniel Webster College before and during the closure process. This foundation provided insight to how informed students felt throughout the process, and their perceptions regarding the knowledge of school faculty and staff, as well as a timeline of events surrounding the closure.

My second, third, and fourth secondary questions gave me insight into the perceived resources available to students before and during the school closure, and how students utilized those resources. Question two identified areas of support provided to students, and who offered the support. Question three explored financial issues that arose for students as a result of the closure, and issues regarding transferring their academic credits to a new institution. This question was important to explore due to findings in previous research, which claimed that students acquired student loan debt for academic credit that was not recognized in the non-profit sector (U.S. Senate, 2010). Question four allowed me to gain an understanding of how participants perceived higher education, to recognize their priorities when choosing an institution, and further explore their perception of the college closure through comparisons made between Daniel Webster College and their new institution.

Rationale for Research Methodology

In developing my research design, I continually reviewed the gaps in research identified in previous studies, along with the findings presented by those studies, and asked the questions: What data would add to existing research on for-profit colleges to allow a greater understanding of the student experience? What methods could I utilize to explore key topics that arose from the literature on students who had attended for-profit institutions without making those topics the

focus of my research? It was important for me to step away from any pre-conceived assumptions I had regarding this topic and open myself up to gaining an understanding of the student experience. The majority of the data collected in previous studies was quantitative, and while the data provided a critical foundation for understanding the demographics of students enrolled at particular types of for-profit colleges, and specific financial impacts on these students, there is a need for rich, in-depth data on the experiences of students who had enrolled in for-profit colleges that had suspended operations, their perceptions of the closure, and how they fared after the closure. For this study, I hoped to contribute to the field by providing some data on the student perspective of a school closure.

Qualitative Inquiry

Schramm (2006, p. 9) states, “Qualitative inquirers seek to make phenomena more complex, not simpler.” In chapter one of this paper, I described the “umbrella category” of for-profit institutions, and the lack of acknowledgment in identifying the distinct types of institutions within the for-profit sector. Quantitative research findings have provided a broad understanding of issues faced by enrolling in the for-profit sector. However, while I drew on the findings of previous research on the for-profit education sector to shape my research questions and gain an understanding of some of the key issues affecting students enrolled in for-profit institutions, I wanted to conduct a more in-depth exploration of the student experience. In choosing one type of for-profit institution, examining the closure of this institution, and exploring the experiences of students during this closure, I am providing a more complex view of for-profit colleges and the students experience within the for-profit sector. The qualitative approach allows for both the exploration of the issues, and provides room for emerging avenues of inquiry during data collection and analysis (Cresswell, 2009).

In Maxwell's (2013) work, he describes the five intellectual goals that qualitative research is especially suited towards accomplishing:

- To gain an understanding of the participant perspective of the experiences and situations in which they were involved.
- To gain an understanding of the context of the participants' experiences- essentially, an understanding of what was occurring and how it was influencing the participant.
- To gain an understanding of how events unfolded (the process).
- To identify emerging, unanticipated themes within the scope of the research.
- To develop explanations of the interactions between themes, how one theme might affect another.

In addition to these intellectual goals described by Maxwell, he discusses the use of qualitative methods to achieve practical goals. These goals include the generation of new theory in research, grounded in the perspective of the participant. Another goal is to conduct research that is used to inform public policy and improve current practices within the field of inquiry.

Phenomenological Approach

According to Seidman (2013), the focus of phenomenological research is to understand the experience of the participant as well as the meaning given to that experience by the participant. Since the purpose of my research was to obtain a better understanding of the experiences and perceptions of students surrounding a school closure, as described by the students themselves, I enlisted the qualitative approach that best supported this purpose.

Phenomenological research, as described by Seidman (2013), is structured around four themes, the transitory nature of human experience, subjective understanding, lived experience as

the foundation of phenomena, and emphasizing meaning and meaning in context. In the phenomenological approach to inquiry, the researcher asks the participant to look back on, and re-live their experiences, seeking to understand the experiences of the participant from the point of view of the participant. In reconstructing the lived experience, the participant is revealing her understanding of and meaning-making regarding the phenomenon. The researcher asks the participant to reflect on the lived experience, which in turn makes meaning of the experience.

The characteristics and structure of interviews in this approach to phenomenological inquiry support the four themes identified by Seidman (2013) in that it allows researchers both the time and interview techniques to explore the experiences of participants. Interviews are conducted in three parts, the first exploring the background of participants, the second focuses on details of the experience, and the third interview involves the participant reflecting on their experiences. The interviewer uses open-ended questions and asks clarifying or follow-up questions, if necessary. Seidman identifies fundamental techniques to be utilized during the interview process, including trusting your hunches, listening more and speaking less, and structuring follow-up questions in an exploratory, rather than probing manner.

Data Collection

Overview

I submitted my research proposal to the Institutional Review Board for the Protection of Human Subjects in Research (IRB) at the University of New Hampshire on May 15 of 2017. The IRB application was reviewed, and approved by the board on May 23 of 2017. The IRB application, IRB approval letter, and letter certifying my completion of the Responsible Conduct of Research training, a requirement of the UNH graduate School, are all provided in Appendix C. I began interviewing participants in June of 2017 and continued data collection through October of 2017.

It was important to try to piece together a timeline (Figure 11) of events leading up to the school closure, because of the multiple stakeholders involved in the process. The timeline served to assist me in identifying relevant events prior to the closure, and gave me a context when listening to participants' stories. I obtained documentation from websites for the U.S. Department of Education, New Hampshire Department of Education, and Southern New Hampshire University, shown throughout chapters 4 and 5, to create a broad timeline of events.

FIGURE 11. Timeline of DWC Closure

	2009	2010	2011	2012	2013	2014	2015	2016	2017
ITT acquires DWC				Findings of U.S. Senate Report are released, ITT Educational Services Investigated			1. ITT sanctioned by DOE 2. Uncertain future for DWC	1. ITT closes campuses 2. DWC suspends operations 3. SNHU takes over operations	SNHU graduates DWC students

Pilot

I conducted a pilot interview before interviewing participants. Schramm (2006) identifies four instances in which he encourages researchers to use pilot studies when the researcher needs to clarify their understanding of a concept within their inquiry, to uncover biases in their thinking, to gain a sense of the meaning of experiences of the participants, or to engage in a chosen method of research. I used the pilot to experience the phenomenological approach that I had chosen. I wanted to gain an understanding of the process through experience, and try to identify any issues that might arise during the process (Seidman, 2013). Conducting a pilot interview helped me gain an understanding of the process itself, and made me aware that I wanted to interview participants in person rather than over the phone, whenever possible. I was

also able to understand the stages of Seidman's interview process, and how the interview sessions complement each other, allowing the researcher to build a rapport with the participant (Seidman, 2013). Data from the pilot interview were not included in the findings reported in this study.

Participants

The target population of this study was students who were enrolled in Daniel Webster College in the semesters leading up to the school's closure, which occurred during the 2016-2017 academic year. Due to the timeline of events and the sanctions imposed upon Daniel Webster's parent company, ITT Educational Services, I wanted to interview students who were enrolled in the school between 2015 and 2017. Initially, I sought out participants who were aligned with the demographics identified in previous research on for-profit college student demographics. Previous research identified the majority of students enrolling in for-profit colleges as first in their family to go to college and as coming from a low-socio-economic background (U.S. D.O.E., 2010). However, upon beginning to search for research participants, I began to realize that the enrolled student population of Daniel Webster College did not reflect the findings of previous research. The student body of Daniel Webster College was more diverse in terms of both parental education attainment and socio-economic status, as I will expound upon further in my findings chapter. As the purpose of my study was to understand the impact of a school closure on enrolled students, I chose to include traditional students, along with non-traditional students in the study. A testament to Schramm's (2006) statement on qualitative research and complexity, I found as I started interviewing students there was a continuum of student types in my study and many students could not be described solely as traditional or non-traditional.

Even if participants were initially labeled within a particular category, upon interviewing students and exploring their backgrounds, there were circumstances in their lives that made the ability to label students as “traditional” or “non-traditional” more difficult. An example of this is a participant whose father obtained a bachelor’s degree from an accredited university in New York. Initially, I would not have labeled this participant as a first-generation college student. When speaking to the participant further about his background, he revealed that his father was substantially older, had graduated before the participant was born, and was estranged from the family beginning when the participant was a young age. The circumstances surrounding his family situation negated the implied benefits of having a parent who was experienced in the higher education process.

Seidman (2013) discusses the use of “gatekeepers” as a method of accessing potential participants, and I identified this as the primary means to find participants for my study. I also understood that, using this method, I would rely heavily on these gatekeepers to distribute information on the study rather than giving me direct contact information for students, as faculty and staff are bound by FERPA, the Federal Educational Rights and Privacy Act. Relying on knowledge I had obtained about where Daniel Webster students were most likely to seek transfer admission after the closure, I contacted student services staff at Southern New Hampshire University and University of New Hampshire at Manchester through email, introducing my study. I also emailed faculty chairs from the same programs that were available at Daniel Webster College, in case students were choosing to stay in the same major after transferring to their new institution. I shared the consent form, and asked that faculty and staff share my contact information with potential research participants. In addition to email, I met with staff from both institutions. I chose these two universities because they are the largest institutions in Southern

New Hampshire, and are in close proximity to the Daniel Webster College campus. Southern New Hampshire University (SNHU) is a private, non-profit institution, which agreed to take over the classes on the Daniel Webster College in a “teach-out” until May of 2017, allowing students to finish out the academic year on the Daniel Webster Campus, if they chose to do so. University of New Hampshire at Manchester is a college of the University of New Hampshire, a public, non-profit institution in Durham, New Hampshire. The Manchester College is a commuter campus, with a less expensive cost of attendance than the UNH Durham campus, and whose student demographic includes more transfer students than the main campus in Durham. UNH Manchester also is a smaller campus, with class sizes similar to Daniel Webster College.

I interviewed seven participants, who represented a cross-section of students from various degree programs and were of different class standings, from freshmen to seniors (Table 1). I wanted to get a better sense of the experience of students across disciplines, rather than from just one academic department. I interviewed students of various class standings in order to get a broader understanding of student perception of the closing, and not have specific issues surrounding class standing overshadow the event of the closing itself.

Table 1. Final Research Participants

Participant	Gender	Age	Parent College	Financial Aid	Major
1	F	20	NO	NO	Homeland Security
2	F	22	NO	YES	Engineering
3	F	57	YES	YES	Aviation Mgmt.
4	M	37	YES	YES	Engineering
5	M	21	YES	YES	Management Info. Systems
6	M	32	NO	YES	Engineering
7	M	21	NO	NO	Construction Mgmt.

Interview Process: Theory and Application

My initial contact with participants was through email. I introduced myself, described the study and the purpose of the study, and attached a copy of the consent form for participant review. I asked participants to contact me via telephone, so that I could answer any questions they had, and go over the timing and structure of the interviews and the consent form. The second contact I had with each participant was over the phone, I received signed consent forms either through email attachments or at the beginning of the first scheduled interview, if the first interview took place in-person. I received participant’s permission to record the interviews, so that I would be able to listen and take notes as they spoke. Using Seidman’s (2013) approach to phenomenological research, I planned on interviewing participants using the in-person three-interview structure, however, realistically this wasn’t always possible. I had to be flexible in data collection with three of the participants, due to family or work commitments. With these participants, I restructured the interviews into two parts, ending the first interview within the second set of interview questions, and continuing the second interview through to the final set of

questions. I wanted to conduct each interview in-person, but this was not always possible, either. While I strived to meet participants wherever they were available, at times driving to different towns throughout New Hampshire to meet a participant for an interview, there were times that participants insisted on a phone or Skype interview. This issue was addressed by Seidman, and was something I was apprehensive about before data collection started, as I felt that it was harder to build good rapport with a participant over the phone. However, having both email and phone contact with participants before beginning of the interview process aided in establishing a rapport with participants, even if it was not as effective (in my perception) as the rapport built by in-person interviews. In these cases I followed Seidman's advice to "communicate the importance of the interview versus not being able to interview at all (p.113)."

The first interview focused on the background of the student. I collected demographic information, asked participants about the level of education of their parents and other family members, and asked how they first became interested in pursuing a degree in higher education. This interview gave context to the participants' past experiences in education, including whether providing an understanding on how the participant became an enrolled student at Daniel Webster College.

The second interview focused on the experiences of participants while attending Daniel Webster College. I asked participants to describe their experiences after enrolling in the school, perceptions of the circumstances surrounding the closure, and their experiences with faculty, staff, and other students at the school. I asked them to give me a timeline of events from their perspective, as not all participants stayed until the school closure, or even the "official" announcement of the closure. I asked for descriptions of the resources the participant was

offered, if any, to continue their education, and how they viewed those resources, and how they chose a new institution in which to enroll.

I began the third interview by again asking the participant to touch upon their perceptions of the closure and how they chose to continue their education. I asked them to describe their experience with their current institution, and about decisions they made regarding their major of study. Finally, I asked about their overall perceptions of higher education, what they felt they learned throughout their experiences in higher education, and if they had any insights or advice that they would share in regards to higher education.

Although I've laid out the interview process in terms of the aspects of the three interviews, the process was not always so linear, and I identified two main reasons for this occurrence. As participants either became more comfortable with me as the researcher, or with being interviewed, they discussed their experiences more freely, which brought discussions back to questions in previous interviews. Secondly, as participants were reliving different aspects of their experiences, they were giving meaning to those experiences, a fundamental theme in phenomenological inquiry, according to Seidman (2013). I took field notes during interviews, to help me identify statements of interest made by participants, and prior to each interview I would review field notes from previous interviews. This technique allowed me to identify any clarifying or follow-up questions I missed in previous interviews, and ask participants for further descriptions.

Data Analysis

Preliminary analysis began during data collection, at which time I noted topics relating to current research and possible emerging themes in the data through my use of field notes. Heeding Seidman's (2013) advice, I avoided in-depth analysis during this time, instead using this

preliminary analysis as an opportunity to identify both follow-up questions for emerging themes and topics to explore for further clarification. After data collection was complete, I used the six steps for data analysis identified by Cresswell (2009) to begin an in-depth analysis. I began organizing data by transcribing interviews, which allowed me to listen to the participants once again, and I continued to record notes during transcription. When transcription was complete, I read through the transcriptions, field notes, and documents that I had collected, and marked the areas of interest in the data (Seidman, 2013). Themes emerged from these areas of interest, and I followed Saldaña's (2013) suggestion, first writing analytic memos for each interview, and then exploring categories that would be most appropriate for the study. Due to the nature of the study, I categorized the data into a priori themes and emerging themes. A priori themes were based on existing research, such as demographics, familial resources, and school resources, initial perceptions of higher education, and transfer credit and financial aid issues. Emerging themes were based on the experiences and perceptions of the students in the areas of unofficial and official notification of DWC closure, transition support, student independence, student concerns, and influences on school choice.

Issues of Trustworthiness

In Maxwell's (2013) discussion of validity, he provides a list of strategies that can be employed for ruling out threats to validity and increasing the credibility of data findings. I used many of these strategies through data collection and analysis, in addition to Seidman's (2013) tools for collecting data using phenomenological methods of inquiry. Within Seidman's interviewing framework, I used semi-structured interviews as a means to decrease the threat of researcher subjectivity, and to focus on the experiences of the participant. Field notes helped me

identify avenues of further inquiry, and I was able to ask clarifying questions and explore areas where data from a participant appeared inconsistent.

In data analysis, I used triangulation between transcripts, field notes, and memos to deliberate on the data I collected, to develop themes. I also used documents from the media, SNHU, and the Department of Education to provide a context for the timeline and complexity of events that occurred surrounding the closure of the college.

Ethical Considerations

Researchers have an ethical obligation to protect the privacy of their research participants (Cresswell, 2009). I stated in my IRB, that the risks to the participants of this study were minimal, stating that the risk to the participant was in their association with a failed institution of higher education. On the consent form I also stated the risk, gave the participants the option to remain anonymous, and if they chose to remain anonymous, I would provide a pseudonym for them. I also explained that even if I didn't use their name, they might be identified by personal information that they share in the interviews, so I could not guarantee anonymity. Only one participant requested to remain anonymous, however, upon beginning data analysis, I chose to provide pseudonyms for all seven participants as a measure of protection. The participants shared some very personal stories, and twice participants asked me if I could stop recording as they shared personal information to add context to their stories. I stopped recording and did not take notes during these interludes, instead taking the view that it was helping the participants make meaning of their own stories.

Limitations and Delimitations

Researcher subjectivity, stemming from my professional experience with students from for-profit institutions, and my knowledge of prior research on the for-profit sector, was a possible

limitation that I considered when designing this study. I am aware of my own bias and have worked towards an understanding of the purpose and value of for-profit institutions. Schram (2006) describes “epoché,” an important concept in phenomenology, as “...the ability to suspend, distance ourselves from, or ‘bracket’ our judgments and preconceptions about the nature and essence of experiences and events in the everyday world.” Using the phenomenological method of inquiry, and the interviewing tools suggested by Seidman (2013), such as using open-ended questions and the “talking less and listening more” approach to interviewing participants, helped with the problem of researcher subjectivity. I understood that the purpose of the research was to explore the experience, and the perception of that experience, of the participant enrolled in the college. I was able to distance myself from my judgments because I had no prior knowledge of Daniel Webster College.

My research involved a diverse group of participants, both traditional and non-traditional students, who attended one type of for-profit institution, a four-year, bachelor-degree granting institution. Based on the very general nature of research in the area of for-profit education, these demographic specifications will not allow for an overall understanding of for-profit education student outcomes. Rather, my research findings focused on a niche of the for-profit higher education market, bachelor-degree granting institutions that closed for business, and the students who were left without a way to finish their degree at the school in which they enrolled. The niche becomes even more specialized because of the history of Daniel Webster College, and its reputation in the surrounding community, which allowed the school to enroll a much broader demographic of students than for-profit schools that don’t have an established name and history. Further, students who were enrolled in Daniel Webster College during the closure had a significant resource in Southern New Hampshire University’s willingness to conduct a teach-out.

The manner in which the teach-out occurred was of great benefit to students, easing the transition of students into other colleges or universities, and allowing students who were nearing graduation to complete their degree. This teach-out model has not always been available to students of other closed for-profit institutions.

Summary

In this chapter a detailed description of the research methodology used in this study was provided, including a rationale for methods used. Phenomenological interviews were used to collect qualitative data on the experiences and perceptions of students enrolled in a for-profit institution, Daniel Webster College, that suspended operations after its parent company, ITT Educational Services declared bankruptcy. The participants were seven students who were enrolled in Daniel Webster programs in the semesters leading up to the official announcement that the school was suspending operations. Seidman's (2013) methods for phenomenological interviews were employed, in which multiple interviews with participants were used to collect data. Validity measures were utilized within the framework of the interview methodology, such as using semi-structured interviews, asking clarifying questions, and avoiding leading questions. Validity in data analysis procedures included using triangulation between field notes, memos, and interview transcripts. The use of open-ended interview questions, and the utilization of Seidman's interviewing techniques allowed for emerging themes in analysis, in addition to themes informed by data from existing literature.

The review of existing literature yielded a framework for the research questions in this study, as it identified both gaps in research and specific impacts of the for-profit education model on enrolled students. However, building on the existing research, the purpose of this study was to conduct an exploratory analysis of the student experience and perceptions of a school closure.

This study will contribute to the research on for-profit post-secondary institutions, and on the students who enrolled in these institutions. I hope that the data collected in this study will help education policy-makers, on both the institutional and national level, to make informed decisions surrounding the impact of school closures on enrolled students.

CHAPTER 4

FINDINGS

The purpose of this study was to understand the experiences of students enrolled at a for-profit college in the semesters leading up to the school's unanticipated closure. An understanding of the experiences of students surrounding a school closure serves to provide more data on the diverse demographic of students enrolled in for-profit higher education, and inform the decisions of policy makers and colleges when considering how best to assist students in continuing their education after such a closure. Further, the data collected from this study expands upon the current literature surrounding the for-profit sector by identifying a type of for-profit institution that has not been thoroughly discussed in current research. In this chapter, key findings obtained from in-depth, phenomenological interviews with seven participants, are presented. To set the context for findings, a brief history and profile of student demographics of Daniel Webster College is provided, including a timeline of events leading up to the school closure, obtained through documents from the Department of Education, SNHU, and various public media sources. It was also necessary to provide demographic profiles on participants, to set context for the findings and discussion surrounding the findings, as the demographic profiles of participants expand upon the findings of current research.

The phenomenological method and my research questions worked well in data collection, drawing out the experiences and perceptions of participants, but I was surprised by the stories I was hearing from participants. During analysis I coded data into two broad categories: a priori themes based on the findings of existing research, and emerging themes which consistently arose throughout interviews across participant data. A priori themes included data on financial aid,

academic credit transferability, and continuing education. While the a priori themes were based on existing research, the data in this study contradicted findings presented in the current research. Upon further investigation into the institution and circumstances surrounding the closure I began to understand these contradictions.

Coding the raw data and identifying emerging themes was also difficult due to how the data collected seemed to vary from the data from existing research. To facilitate the coding process I had to continually focus on the words of the participants and what they had given importance to when describing their experiences. Emerging themes arose from participant experiences of the school closure, perceptions of the teach-out, and how students perceived higher education after their experiences of the closure. The most compelling findings from the emerging themes were views and insights on higher education expressed by participants.

Throughout this chapter I will be providing excerpts from interviews in order to provide a greater insight to the experiences of participants, in their own words. Five major findings emerged from the data:

1. All participants experienced indications of the DWC closure before any official announcement was made, including discussion within peer groups, interactions with faculty, students noticeably transferring out of DWC, and media articles. Participant perceptions of diminishing school staff and resources were also identified as indications of the school closure. Five of the seven participants first learned of ITT's ownership of DWC during this time. Three participants reported that they received official notification of the school closure through email, three participants received notification by mail, and one participant reported that an administrator announced the closure during a class.
2. The majority of participants (six) reported having positive experiences with SNHU's handling of the teach-out, and transition support. Participants reported that SNHU informed students about the circumstances that occurred with DWC, and offered support and provided options for students to continue their education.
3. Five participants received financial aid assistance while attending DWC, two of which experienced issues with financial aid that were disruptive to their education, however none of the students experienced issues with financial aid which were

- detrimental to their financial well-being. All of the participants reported that they did not experienced issues with transferring credit from DWC to another college or university.
4. Participants identified a variety of factors that influenced the choices they made to continue their education after their experiences with DWC. Three participants reported that they chose an institution that they felt would not close while they were completing their program, two participants reported that they chose an institution based on a new major, two participants reported that they chose an institution where they could complete their current major. Two participants reported taking prerequisite classes at a community college before transferring into their current university, and three more students identified community colleges as viable options for both major exploration and general education courses.
 5. All participants reported a positive view of higher education after their experiences with the DWC closure, with two participants claiming that the experience increased their appreciation of education. The majority of participants expressed the necessity of obtaining a degree in order to accomplish professional and personal goals.

History of Daniel Webster College

An overview of the complex history of Daniel Webster College is necessary in order to provide context for research findings and subsequent analysis of those findings. Daniel Webster College, originally known as New England Aeronautical Institute, was founded in 1965 as a non-profit, private educational institution in Nashua, New Hampshire. The purpose of the college was to provide educational programming in the subjects of aerospace and aeronautics. NEIA started an affiliate school, Daniel Webster Junior College in 1967, in order to offer general education courses within their programs. In 1978, NEIA and DWJC merged and became Daniel Webster College, also gaining regional accreditation through the New England Association of Colleges and Universities (NEASC). Throughout the 1970's and 1980's, Daniel Webster College began offering both associate's and bachelor's degree programs, and made major expansions to their campus in Nashua. Daniel Webster College was ABET (Accreditation Board of Engineering and Technology) accredited, one of only four schools in New England to have ABET accreditation in

Aerospace Engineering, and was one of nine schools in the country selected by the Federal Aviation Administration (FAA) to train Air Traffic Controllers (Shalhoup, 2010). One participant I spoke with described the reach of DWC's flight program:

So, my parents went to Alaska and when they went to Alaska they went on a small, little flight, alright, ah, oh gosh, what are those things called? A pontoon boat...or an amphib aircraft... So, they took a like a 2-hour flight, 3-hour flight through the mountains up in Alaska. Well, my mothers... talking to the pilot.

She's like, 'oh where'd you learn to fly?'

And she's like, 'Oh I went to this little school,'

And she's, like, "where was it?'

She said it was, 'in a town that you probably never heard of.'

So, my mother kept on pressing, like, 'where?'

'Oh it was in Nashua,'

'Nashua what?'

'Nashua, New Hampshire.'

'Really? What was the name of the program?'

'Oh, it was part of a smaller school there.'

My mother goes, 'Really, what school?'

Lady finally gives up what, 'Oh, it was Daniel Webster College.'

My mother and my father were in Alaska being flown around by a student that graduated from Daniel Webster College, the school that I was a currently attending. My mother and my father were just flabbergasted at that, you know. So, her husband also graduated the flight program from Daniel Webster College. So that is just that should speak words

about the program- 'cause, it's not just graduates...don't just stay around in the local area- they leave the area and they go all over the place.

This participant provided another example of the reach of DWC alumni:

I've got a friend of mine that graduated back in 2008... And in high school, I was friends with him and I kind of messed with him a little bit...it was his first day at school and it was a smaller high school not really a super large high school and... you know, I started befriending him saying 'hey where you from, what are you doing, why are you here,' you know, those type of questions. Found out that he was from Canada that he was moving to the United States. His mother was US citizen and his father was a Canadian citizen, but he was working for Irving Oil company and they were expanding in this area...and at any rate, what it comes down to is that he (the high school friend) also graduated Daniel Webster college. He graduated from the Aeronautical Engineering program...and is currently, right now, flying F22s for the United States Air Force.

Despite the growth of the college, and the successes of its alumni, Daniel Webster College had financial struggles, and was threatened with losing its accreditation from NEASC, and therefore its ability to provide Title IV funding to students through the U.S. Department of Education. According to Lamontagne & Williams (2009) DWC entered into an agreement with ITT Educational Services in 2009, in which ITT would acquire Daniel Webster College, saving the college from losing accreditation and access to federal financial aid, and allowing DWC to continue offering educational programs in southern New Hampshire. Within a year of acquiring DWC, ITT decided to close the flight school, drawing criticism from the community and the Aircraft Owners and Pilots Association (AOPA), one of the largest not-for-profit aviation associations in the world. An article on the AOPA website speculated that ITT had acquired

DWC because of the school's accreditations and had no intention of keeping the flight program (Twombly, 2010).

One research participant recalled this event:

Yes, it was 2009, I remember that transition. Let's just say it wasn't the foremost thing in my mind, but I knew that they (DWC) had been acquired, and that they (ITT) were shutting down the flight school. That was a big thing.

Another participant mentioned that they knew DWC had a flight school, and hadn't realized that it was shut down until after enrolling:

I mean, the first time I went there (DWC), like to go check it out, I knew it was an aviation school, I mean there is an air field right next to it and I was surprised to find out that I don't think they do the piloting license over there anymore or they didn't at the time. They got rid of it I guess it was too expensive or something.

With the release of the Harkin Report (2012) the for-profit education sector, including ITT Educational Services, started receiving closer scrutiny by the federal government. DWC was addressed briefly in the Harkin Report, described as a "brand" of ITT:

With the release of the Harkin Report (2012) the for-profit education sector, including ITT Educational Services, started receiving closer scrutiny by the federal government. DWC was addressed briefly in the Harkin Report, described as a "brand" of ITT:

ITT operates two brands, ITT Technical Institute ("ITT Tech"), which accounts for 99 percent of the company's students, and Daniel Webster College, New Hampshire based with approximately 600 students. ITT Tech campuses are Independent Colleges and Schools (ACICS). Daniel Webster College is regionally accredited by the New England Association of Schools and Colleges, Inc. (NEASC).

Additionally, a brief description of DWC that was included within the report (p. 560):

Daniel Webster College was acquired by ITT in 2009 for \$20.6 million. According to the news reports, the primary rationale for the purchase was because ITT wanted to acquire a regionally accredited college.

Following the acquisition, ITT fired one fourth of the staff, including the school president. Interviewed in early 2012, the former president stated, 'ITT didn't have much interest in anything other than having acquired a regionally accredited institution' and that 'if (he) had to do it all over again, (he) wouldn't have gone anywhere near ITT. The fundamental nature of the college has changed.' He went on, 'ITT came in and said, 'we only want faculty to teach, we'll develop curricula in Carmel, Indiana and give them to you.'

Asked about Daniel Webster's growth potential, Michael Clifford (an investor involved in the formation of both Grand Canyon Education and Bridgepoint Education) noted that he believed that Daniel Webster College, 'could parallel Grand Canyon or Bridgepoint's growth curve.' While ITT initially had difficulty obtaining approval from the regional accreditor, after 2 years the company has finally obtained approval to begin to offer online programs (specifically business administration at the Associate, Bachelor's, and Master's level).

In 2015, ITT Educational Services was sanctioned by the Department of Education, and notified that failure to comply with DOE requirements would make ITT ineligible to participate in Title IV programming (Appendix D). This ineligibility would prevent students from using Pell grants or government-backed student loans to pay tuition for educational programs at ITT schools. In late 2016, the DOE prohibited ITT Technical Services from enrolling any new students who were eligible for Title IV funds, and in September of 2016 ITT closed down all 130 of its campuses (Smith, 2016). Speculation regarding the closing of DWC began with the sanctions against ITT, and warnings from NEASC and ABET regarding accreditation of the school. A joint press release (Figure 12) found on the NEASC website explained the precarious position of DWC (https://cihe.neasc.org/sites/cihe.neasc.org/files/downloads/Public_Statement/DanielWebsterCollegeStatement_9-2-2016.pdf).

FIGURE 12. NEASC and DWC Joint Press Release

**Commission on Institutions of Higher Education, NEASC and
Daniel Webster College
Statement Regarding the Accreditation of Daniel Webster College**

Daniel Webster College (the College), located in Nashua, New Hampshire is accredited by the Commission on Institutions of Higher Education (the Commission) of the New England Association of Schools and Colleges. Granted candidacy in 1968, the College has been continuously accredited since 1972.

On August 30, 2016, the Executive Committee of the Commission (the Committee), acting on behalf of the Commission, voted to ask Daniel Webster College to show cause at the Commission's September 2016 meeting why the College should not have its accreditation withdrawn or be placed on probation. The Committee took this action because it has reason to believe that the College may no longer be in compliance with the Commission's standards on *Organization and Governance* and *Institutional Resources*. As part of this process, the College is asked to submit a report in advance of the meeting and to meet with the Commission to discuss the concerns identified by the Committee.

At issue are the extraordinary demands made by the U.S. Department of Education of the College's parent organization, ITT-ESI, and the ITT Technical Institutes, as outlined in an August 25, 2016 letter from Ron Bennett, Director, School Eligibility Group, U.S. Department of Education to Kevin Modany, CEO of ITT-ESI. The letter outlines a series of requirements placed on ITT-ESI and ITT Technical Institutes that include increasing the letter of surety ITT-ESI must post to \$247 million, of which \$153 million must be posted within 30 days of the August 25, 2016 letter. The Department's action also placed the ITT Technical Institutes on Heightened Cash Monitoring 2 (HCM2) while, at the same time, not allowing new students at the ITT Technical Institutes to participate in Title IV federal financial aid programs. The Department was clear that the Title IV restriction for newly enrolled students does not apply to students at Daniel Webster College. However, the Executive Committee is concerned that if ITT-ESI, the parent corporation for Daniel Webster College, cannot meet the Department's requirements for surety, or is otherwise destabilized by not being able to award Title IV funds to new students, the result may put the finances and indeed the continuation of Daniel Webster College at risk. Thus, the request for the College to show cause arises from the Committee's concern over the fate of the parent corporation and possible negative effects on the College.

Daniel Webster College is scheduled for a comprehensive evaluation visit in November 2016, as part of the normal 10-year cycle of accreditation.

September 2, 2016

A teach-out was arranged between ITT and Southern New Hampshire University, approved by the New Hampshire Department of Education (see Appendix E), and DWC students were able to finish the 2016-2017 school year through SNHU. News of the teach-out was

announced on the NEASC website (<https://cihe.neasc.org/snhu-lead-teach-out-daniel-webster-college>) (Figure 13).

FIGURE 13. NEASC Announcement

SNHU to Lead Teach Out of Daniel Webster College

[Home](#) > SNHU to Lead Teach Out of Daniel Webster College

Southern New Hampshire University to Lead Teach Out of Daniel Webster College

On September 12, 2016, the Executive Committee of the Commission on Institutions of Higher Education, acting on behalf of the Commission, approved the teach out plan and articulation agreement developed by Southern New Hampshire University, Daniel Webster College and ITT-ESI, which has been the parent corporation of Daniel Webster College since 2009. The agreement was also approved by the New Hampshire Postsecondary Commission. The agreement will allow Title IV funding to be available to Daniel Webster College students.

Daniel Webster College will remain accredited until August 31, 2017, for the sole purpose of letting students who are near completing a Daniel Webster College degree complete their degree. The agreement also provides pathways for Daniel Webster College students to transfer to Southern New Hampshire University.

A copy of Southern New Hampshire University's FAQ for Daniel Webster College students and parents can be found [here](#)

During a teach-out, an institution with similar accreditation provides educational services to students enrolled in a failed institution, allowing students to finish their current semester.

Information from the NEASC website

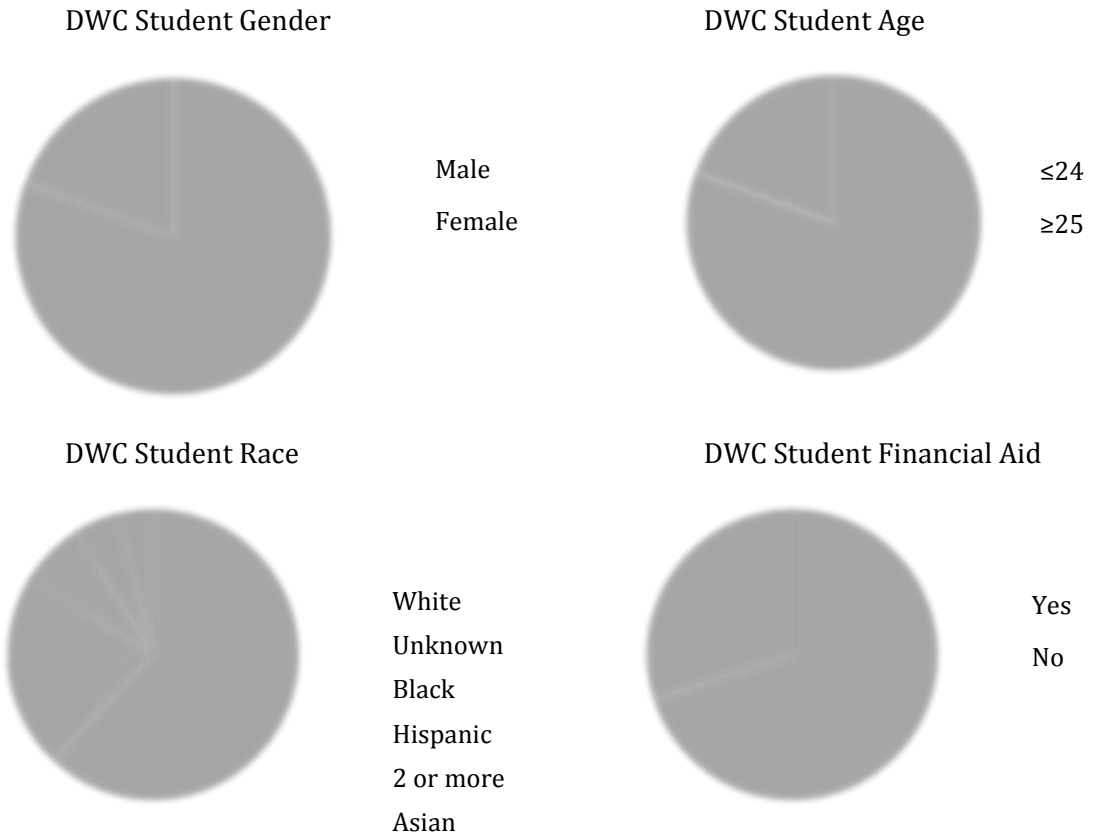
(https://cihe.neasc.org/sites/cihe.neasc.org/files/downloads/Public_Statement/DWC-FAQ.pdf) regarding the teach-out of DWC by SNHU is provided in Appendix F.

Daniel Webster Demographics

Data from a report (see Appendix G) of the NCES' Integrated Postsecondary Education Data System (IPEDS), shows that 678 undergraduates were enrolled in DWC during the 2016-2017 academic year. Figure 14 provides an overview of student demographics before the school closure. 80% of undergraduates were males, 20% were female. Approximately 86% of students were under the age of 24, 13% were age 25 or older. The majority of students (62%) identified as white, 10% identified as Black, 7% identified as Hispanic, 4% identified as Asian. 12% did not

identify, and 5% identified with two or more races. 70% of DWC students received financial aid, while 30% did not. Data identifying the number of first-generation college students enrolled at DWC were not available in these reports.

FIGURE 14. DWC Student Demographics



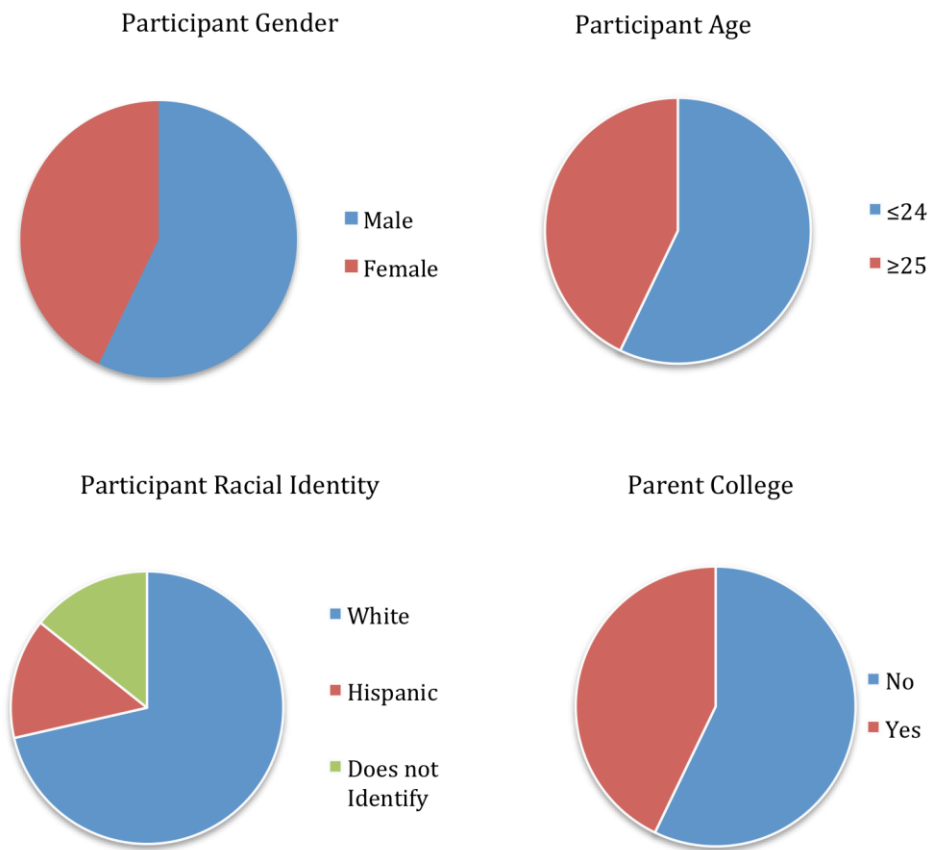
SOURCE: U.S. Department of Education, National Center for Educational Statistics, Integrated Postsecondary Education Data System (IPEDS): Winter 2015-16 Financial Aid Component.

Participant Demographics and Background

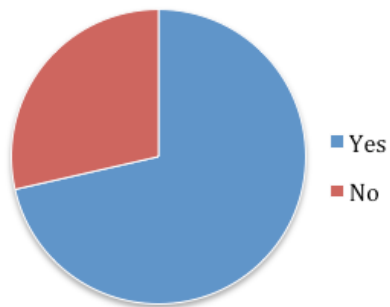
Seven participants were interviewed for this study (Figure 15), three were female, and four were male. Four of the participants were traditional college-age students (≤ 24), three participants were older than the traditional age range (≥ 25). Age ranges for students were based on the age (24) that students are considered dependents by the Department of Education, and still require parental tax information to apply for financial aid.

Four participants reported being first-generation college students, while three reported at least one parent as having obtained at least a bachelor's degree from an accredited U.S. institution of higher education. Five participants identified as white, one identified as white with Hispanic descent, and one did not identify with a particular racial identity. Five participants reported participation in Title IV financial aid programs, while two stated that they did not receive financial aid to fund their college program.

Figure 15. Participant Demographics



Participants Using Financial Aid



A key aspect of phenomenological interviewing is to collect in-depth background information on participants in order to gain an understanding of the basis for their perceptions and understanding of the focus phenomena (Seidman, 2013). It is important to understand more about the backgrounds of participants and gain a clearer picture of who the students enrolled in DWC were, particularly because of the unique history of the school. Data on the demographics of students who enroll in for-profit institutions show that students typically are from disadvantaged backgrounds, either in terms of financial resources or social capital, or are non-traditional in terms of age and family status (U.S. Senate, 2010; Deming et al., 2013; Arbeit et al., 2017). Table 2 expands upon participant demographic information, including background information on each participant, including reported reason for DWC enrollment, and participant knowledge of ITT's ownership of DWC prior to enrollment in the college.

Table 2. Participant Information

Participant	Gender	Age	Parent College	Paying for College	Previous College Experience	Why DWC	ITT Ownership Knowledge
Vincent	M	32	No	GI Bill, FAFSA	Yes	ABET accredited	No
Ally	F	20	No	Grandmother*	No	Sports, major, size, distance	No
Hannah	F	22	No	FAFSA	Yes	Distance	No
Monica	F	57	Yes*	FAFSA	Yes	Aviation Community	Yes
Patrick	M	37	Yes*	FAFSA	Yes	Accredited, distance, major	No
Tim	M	21	Yes	FAFSA	No	Size, distance	No
Zane	M	21	No	Parents	No	Sports, major	No

*Additional information provided in following text

In-depth background information, beyond basic demographics, was collected throughout the interview process and provided context for research findings and discussion. I was not concerned with the individual majors of participants as criteria for this study as my focus was on participant experience, but it is interesting to note that all participants were enrolled in CTE majors while at DWC. While not surprising, as all but one program offered by DWC was considered CTE, it does support prior research stating that over 90% of students enrolled in for-profit institutions are in CTE programs of study (Arbeit et al., 2017). Only one participant (Ally) changed to a non-CTE program of study after transferring institutions after the closure of DWC.

Hannah was a participant who was both first-generation college and qualified for financial aid due to income. Even though neither of her parents attended college, she had a desire from a young age to go to college:

I knew both of my parents didn't go to college, and so I just kind of bounced around a lot, so I was kind of lost, always watching movies and stuff, I always wanted to go to college.

I liked school to begin with, as a kid, and I read a lot. Movies were very influential, the first movie that was really influential was “Legally Blonde.” *laughs* I wanted to go to Harvard for the longest time. I watched it the other day. That was my initial inspiration for an Ivy League higher education. I did a little research on how to go to Harvard and I knew I had to get good grades. So I got good grades. Then I hit middle school and high school, my parents didn’t make a lot of money, and some other hardships came up. Then I just kind of lost that dream for a while.

Ally was also a first-generation student, and would have qualified for financial aid based on parent income, however, her grandfather passed away shortly before she started college, and left money designated for her college education. She reported that, even though her parents never went to college, she was encouraged to do so:

I always knew I was going to go to college, because that was what I was told I was going to do. You can’t just graduate high school and go into the workforce, that’s just not how it is anymore. You can’t just do that and survive financially. So I always knew I was going to. I started looking at colleges my junior year in high school, and I officially decided my senior year and knew I was going to go. I knew kind of from society. That’s how it is supposed to go. And my parents always encouraged me to go, to better myself and further my education. I guess you could say it was a multitude of factors: my parents, other family members, friends going to college and talking about college, and society as a whole nowadays.

Zane was a first-generation college student who did not qualify for financial aid, as his father started a successful construction business and was able to finance his son’s education. His

father wants Zane to take over the family business when he retires, which is the primary reason that Zane is going to college:

I want to take over my dad's company when he retires. He learned everything as he went, without a degree, and he would rather have me learn the business side, so I have some kind of idea, so I don't end up making the same mistakes that he did.

Both Monica and Patrick indicated that one or more parents had a college degree when I interviewed them initially, however, in later interviews they shared more family history.

Patrick's father completed a degree in the U.S. before Patrick was born, and then returned to his native country. Patrick, estranged from his father, moved to the U.S. with his mother as a teenager, and received no help or guidance from his father concerning higher education. Patrick stated that it was an expectation of his family that he would attend college, but there was also a social influence:

Um, the overall expectations of my family were that I would go to college. As far as my culture is concerned, I'm not 100% sure. The economy was very bad growing up, and it was very hard to get jobs, even with education. I remember something I did a long time ago, about 15 years ago, I was still here (U.S.) but I went online on these websites and they were mostly Iranian girls, I'm laughing because these girls all wanted a man with a master's or Ph.D., and it was really important to them. I just realized it was because of the economy over there (Iran), the economy was so bad that you needed a masters or Ph.D. to get a job, and sometimes even that was extremely hard. In my family you were expected to go to school. It was understood.

Monica's father completed medical school, and was also not a useful resource for Monica regarding guidance in higher education. Monica initially started college at a public university immediately after graduating high school, and dropped out during her second year:

I actually started college right out of high school, but had no idea what I wanted to do and changed my major every semester and ended up dropping out after a year and a half. It was the kind of thing that was not tolerated. My dad would say 'just take anything it doesn't matter,' and I told him it did matter because I didn't want to do something I didn't want to. They were not happy at all, there was always that pressure that you're not doing anything with your life. They basically said you put your nose to the grindstone and finish what you started.

Finally, considering DWC's history, it is important to note that only one of the participants was aware that ITT Educational Services owned DWC prior to enrollment at the school. She stated that the ownership did not concern her only because of the reputation of DWC within the aviation community, as her desire was to work professionally in that community. Eighty-six percent of participants were unaware of ITT's ownership of DWC. The majority of participants chose to enroll in DWC due to its distance from home, the small campus, and small class sizes. One participant identified the ABET accreditation as key to his enrollment in the college, while another participant reported that regional accreditation was a factor in his enrollment in DWC.

Experiencing the Closure

All participants experienced indications that DWC was closing before any official announcement was made, including discussion within peer groups, interactions with faculty, students noticeably transferring out of DWC, and media articles. Some indications were not

perceived to be tied to the school closure until after the official announcement, such as diminishing resources and staffing at the school. Most participants were not aware that ITT Educational Services owned DWC when they enrolled at the school, but became aware through discussions with faculty and other students as the situation at DWC intensified.

“There’s no way a college can close...”

Seventy-one percent of participants reported that they had heard rumors from other students at DWC regarding a possible school closure, beginning as early as 2015. Ally, who played on the women’s field hockey team, spoke about the first time she heard about the possible closing:

I first started hearing rumors because I played field hockey, so we had practice days before school started, early in September when the season kicked off. I had a girl on my team who... knew about the school stuff, so she started spreading the rumor that they’re going shut the school down and she was trying to get an interview with the president of the school, but he’s not answering anyone’s call or getting back to anyone. I instantly thought in my head ‘there’s no way a college can close, you’re crazy, relax.’ And she was going crazy about it, and I didn’t think anything of it because I hadn’t heard anything from anyone else, no emails were sent out, no phone calls, nothing. The faculty wasn’t talking about it, either, they didn’t say at the beginning of class, ‘Hey, just to let everyone know...’ They didn’t do that, they didn’t know, but somehow she knew. Um, well, after that, when she told me about that, she kind of told the whole team, we had a group conversation about it. I got it in the back of my mind, and as the weeks went on I started to hear more and more about it from different people. It started to become, it was like a high school, like gossip around high school.

Zane also reported first hearing rumors of the school closure from hockey teammates:

First it was coming from people, and then the captain of the team was filling us in. The coach hadn't said anything at all. It took a little bit before we had a meeting in the auditorium about it, which wasn't that informative. Everyone was like, 'we really don't know.' It's like you were married and your spouse was like, I really don't know, I guess we can get a divorce. You kind of want to know what's happening here, because we're talking about my future.

Hannah, who was not associated with a DWC sports team, and transferred out of the school prior to an official school closure announcement due to issues with the financial aid office, reported hearing rumors from other students regarding the closing:

They just said the school was having trouble, hence the financial aid 'disaster' I dealt with. A lot of people had issues with financial aid, too. It was mostly just speculation among teenagers.

“Congratulations, your position has been terminated with ITT.”

Months before official notification of the closure was announced, Vincent describes an incident that took place during a class, which added to the confusion of what was occurring with DWC:

So, this is how it happened, and I think I told you this. So, one day... I think it was like September 16th, everybody got an email notification from ITT, 'congratulations your position has been terminated with ITT.' So, there was like 3 days where everyone was like, what the hell is going on? Like, the school is still open everything is still going, and... the president of the school at the time had to send out another email to clarify what exactly was going on. And, it was, from an outsider looking in at this, it was funny. If I

were an employee or a faculty member it would have not been funny. It would have been really bad because it looks bad upon your organization to send everybody the same email; congratulations your position has been terminated with ITT. And then have another email sent out by the president within like 20 minutes saying, 'hey, just ignore this email- this is not a termination of your employment with ITT, we are still in negotiations with SNHU. Southern New Hampshire will be taking over, your benefits will...carry over,' and there was a whole boatload of stuff that was associated with that. I really wanted to get a printout of that email though. I was standing right there, I was standing right there beside my one of my professor when he goes, 'huh that's interesting, I got an email from ITT, it seems like my position has been terminated' >laughing<'. So, come to find out after talking to a couple other professors, 'oh yeah, I got that email too, yeah. I got the email after from the president saying to ignore it', so yeah.

Through media sources, Monica had been keeping herself abreast of ITT Educational Services' financial issues and the sanctions placed on the company by the DOE, and shared information in her classes. She also had discussions about the issues with faculty:

A lot of the information I got about that was on my own, you know, and I'd share it with my classes, and let people know where to find the information. They (the faculty) were very uncomfortable with their employment situation. Very uncomfortable. They didn't know if they were going to be kept on (employed) or what.

Patrick recalled that he learned of ITT's ownership of the school from a faculty member during his DWC orientation. While the faculty member didn't speak of the school closing directly, Patrick tied the conversation, and later interactions with other faculty, to the closing:

When I learned that ITT bought that school, at orientation, one of the faculty I talked to told me it wasn't the greatest school, and that they wasted a lot of money, and that I shouldn't go there. And it wasn't just him, there were other faculty that weren't happy about the way things were being run, but I don't know much about that. But that was at orientation. I didn't care if it was a top school or not, I wasn't concerned about that, I just wanted to go somewhere and get my degree. I knew about ITT Tech because I heard their ads on TV all the time, but I didn't know (they owned DWC). At first I was complaining about how things were run, and I'm not surprised that ITT ran them.

Patrick was the second participant to leave DWC before any official word of the school closure was announced. His perception of dwindling resources at DWC was confirmed during a meeting with an administrator:

I worked full-time and couldn't get in to labs when I needed them, I couldn't get a hold of faculty. I was really annoyed. I went to talk to the vice-president about this, and afterwards the faculty helped me more. The vice-president even told me that they didn't have many resources, and so did the faculty.

The perceived lack of resources was also reported by Tim, who reported that his mother became increasingly frustrated by a lack of response to phone calls from the financial aid department.

Tim found out about ITT's ownership of DWC shortly after the semester started and rumors of the closure began circulating. When asked if he had heard about ITT as an educational organization prior to learning about their ownership of DWC, he stated:

Oh yeah, commercials...<ugh> all the cringe worthy commercials.

Further, Tim perceived a lack of community support for the school due to ITT's ownership contributed to the lack of resources for students:

They (DWC) wanted to... get funding for a bus but they got turned down because everyone's like 'you're a for profit school, you can buy your own bus, we don't need to produce the money for you, you're a for profit school you pay for it yourself'... They got almost no support for it which was, yeah, makes sense, but still you know not every school does amazing with profit and stuff so--It's for the kids, I mean...

In addition to the perception of diminishing resources, participants reported additional perceptions of low morale among faculty. Ally explained:

I feel like a lot of the professors didn't really care as much because they were stressed. At least that was my perception of it. In one of my classes we watched YouTube videos, and that was it. That's all we did. That (closure rumors) did come up a lot because students were asking what was going on. Professors were telling us that they had no idea what was going on. Nobody knew. It was stressful for us, and them, obviously. Nobody knew what to think, or what was right.

Vincent summed up the period before the official announcement of the closure:

There was a whole bunch of miscommunication and I think really that's what made the whole situation even worse because students were being told by certain professors, not every faculty member was doing that, but certain professors, that the school was shutting down and that there was no more operating budget and that there was no more money and nobody was going to get paid. And, yeah, there was a lot of miscommunication between the faculty and the students, and that's just the faculty...and not including the administration because the administration was just so overwhelmed with all the stuff that was occurring, that they couldn't get out the information as quickly as they were getting it.

“Oh my God, what is going to happen with us?”

The majority of participants expressed frustration regarding the rumors and uncertainty surrounding the closure of DWC, and many of the participants reported that students started leaving the college. Ally described what she experienced and how she started feeling:

Students got right up and left. Every week there was someone gone. A lot of the students left early rather than later. We had a full group of students in one class, word got out, and soon as they heard it they left because they didn't want their education tampered with. Students were leaving periodically through the first semester, and the second semester, as well. But usually if they stayed until the second semester, they were going to finish up the year...I feel like it made me look at, envy, other colleges I guess you could say. At the time I felt like I wasn't going to a good school. Like, it was non-existent. I envied UNH, SNHU, the bigger schools, because I felt like I wasn't getting a good education at the time. It was very frustrating, we were paying a lot of money to go to school, we were still paying full tuition, it wasn't a discounted fee. So it was very frustrating feeling like your education is less valued than another's because they went to a bigger school, and one that's fully funded, it's very frustrating. It was very frustrating.

Zane reported the following:

A lot of people left before that (Thanksgiving), when we were finding out about it. It was kind of like fight or flight. They choose to leave instead of waiting to see what would happen. Some people were able to get into other schools and, I mean, let's put it this way, there were enough girls to have a girl's hockey team, and that many girls left so that was no longer an option. And I think there was another sports team.

The five participants who stayed at DWC through the closure reported that they stayed because they didn't know what else to do, or because they didn't feel that they had a better option in that moment. Vincent explained his thoughts:

So, it's one of those things... like, 'oh my God what is going to happen with us? What is going to happen with us? What is going to happen with us?' And...I was more worried about what was going to happen, with, not just Daniel Webster college, but the ABET accreditation that the school currently has, or had at that time. So, that was more important to me than what would happen to the school. Why? Because, as I, I've had, up 'til that point, I had an internship with the company that I'm currently at, which is a shipyard locally, okay. The company, because it's a federal agency, requires that you graduate from an ABET accredited school. Now, I was extremely worried about...the ABET accreditation because if I lost that, I would essentially...the past two summers I spent at this particular shipyard working for them, would have just been in vain. Like, it was just a wash, like I did nothing for them...I couldn't get a job with them without having that ABET accreditation, so it was a big risk that I took, to continue school because at that point, I could have moved schools, but I was looking at my transcript and UMass Lowell was not taking all of my credits so it would have taken me another year to graduate 'cause, I looked at what they required, and what I had and went to the list of stuff and...I knew that they wouldn't...I knew for a fact that it would take me another year because if you're a transfer student you can't get a degree from that school without being there for a minimum of one year, which means that it would have taken me at least, if I had left that day that I found out the Daniel Webster College was no more, if I had left that day, I couldn't start the new semester over there at UMass Lowell, I'd have to

wait until the fall semester, start there with my classes...and then I'd have go through that year. And essentially, I'd be working through the summer which potentially, I might not be able to retain my...internship with that particular shipyard so I'd have to reapply for another position at the shipyard- if I was even taken for that position and there were a whole bunch of ifs, where I had...a nice solid road on my way. I had a solid road, as to how I would go throughout the next six to eight months...and when everything happened with ITT, it was like going from a solid, like paved road, all right, to like a dirt road, to maybe like water running over the road, just to eroding it away, you just don't know what is underneath the water- you don't know what's just below the surface, so as I'm going down this road it's like, do I turn around and go back and do the safe thing or do I continue onward and forward and try, you know, to trudge through this.

“I heard about the closing through an email.”

Participants reported receiving official notification of the closure of DWC in one of three ways, including letters in the mail from Daniel Webster College, emails from ITT Educational Services, and an announcement from school administration during class. Participants were uncertain of the dates that they received notification, but the general time frame of notifications was between November of 2016 and January of 2017. Students were notified of the closure of DWC and the teach-out with SNHU, simultaneously.

Ally reported receiving a letter in January regarding the closure, and was not surprised by the notification:

I knew for months that it was going to come to an end. There was just too much evidence. Officially, January, I got a letter in the mail that basically said it, it had the Daniel Webster stamp on it. It basically said that Daniel Webster was going to be closing at the

end of the semester, SNHU was holding a teach-out so students could continue, all of the fees were going to be waived to transfer to SNHU, and SNHU counselors were going to come in and help students register, kind of like, make it easier to transition to SNHU.

Monica, who had been closely following media reports on ITT Educational Services and DWC, stated that a college administrator came into one of her classes and made the announcement:

You know...I don't remember the exact day. The dean of students came in to class and talked to us, told us, but I think I remember reading about something before that. I had these alerts on my computer at work where, if something came up about the school or the airport, I would get an email and it would tell me... As far as I remember the dean came and talked to us, but I had inkling before that.

Tim reported that he was in a class when he learned of the school closing, and described his perception of the reactions of some of his classmates:

I heard about the closing through an email. I was in class, and all of a sudden there was commotion in the class, almost immediately once the email went out. So, once they brought it to my attention, everyone read the full email, it said SNHU was going to do a teach-out and that DWC would be closing after a year, two semesters. It was a pretty big shock; it was in the middle of class. Someone had just happen to check their email and soon everyone was reading their email and it was pretty nutty...When the email went out about Daniel Webster closing there were a lot of students that got to the school that were freshman, it was their first semester, they got this email and they just, it was bad. They lost all hope in DWC...and halfway through the semester in my economics class, there were like 10 or 12 people that were just gone, like half the class basically left and weren't seen again...I sat next to one of them and she was like, 'Yeah, this is stupid, I chose this

stupid school. Why did I choose this stupid school?’ And it was just demoralizing to all the freshmen that went there. They felt like they just wasted their time. Obviously I didn’t know the dirty little secret of Daniel Webster (ITT’s ownership of the school) so I don’t know if they knew it was going to happen, but from what I know it could have been just completely unexpected, like ITT Tech got screwed with some insane lawsuit and then, instead of dealing with it, they were like, ‘No, we’re done’ and then peaced out and screwed everyone over, not just Daniel Webster.

Before an official announcement of the closure of DWC, participants described many indications from a variety of sources that something was wrong, and expressed feelings of uncertainty and fear regarding their academic future during that time. Participants perceived issues with resources, and low-morale among faculty, and saw their classmates leaving DWC mid-semester. Participants reported increasing frustration in regards to the lack of transparency from their educational institution. Participants also reported experiencing the official notification of the closure in a variety of ways, some learning through email, others through mail, and others through an announcement in class. Participants reported receiving notification of the teach-out with SNHU at the time they received official notification of the DWC closure.

Perceptions of the Teach-out

In a press release dated September 13, 2016 SNHU announced that it would lead a teach-out of DWC programs, and described what the teach-out would mean for students (Figure 16). This press release predated reports from participants of official notice of the closure, but participants reported that Southern New Hampshire University quickly became a presence on campus immediately after the announcement. Participants who remained throughout the teach-

out, and the majority of participants who transferred shortly after SNHU commenced with the teach-out had positive things to say regarding the transition.

Figure 16. SNHU Press Release



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Southern New Hampshire University to Lead “Teach-Out” of all Daniel Webster College Programs

Manchester, N.H. – (September 13, 2016) Southern New Hampshire University (SNHU) and ITT Educational Services, Inc. (ITT/ESI) have agreed to a “Teach-Out and Program Articulation Agreement” to help Daniel Webster College (DWC) students continue their degree programs. Last week, Daniel Webster College’s parent organization, ITT, announced the closing of all its campuses. With this announcement, Daniel Webster College students were left in need of an accredited local institution at which to complete their education. The U.S. Department of Education and ITT reached out to institutions to accommodate students, and SNHU agreed to take on all Daniel Webster College programs and students. SNHU then worked with the U.S. Department of Education to enable SNHU to provide degree completion opportunities to the students of Daniel Webster College.

As part of the agreement, SNHU will provide the faculty, facilities and student support necessary to deliver all DWC academic programs through the 2016-2017 academic year. All DWC classes will continue in their current schedules, and residential students will continue to reside on the Nashua campus. SNHU programs will continue at its campus in Manchester, with no changes for students, faculty or staff.

Daniel Webster College students will have access to their 2016-2017 federal financial aid and all institutional aid. SNHU will honor the current rate of tuition and fees for all DWC students for the remaining academic year. Upon completion of the 2016-2017 school year, SNHU will accept all DWC students who meet the minimum admission requirements for all subsequent coursework offered through SNHU. DWC faculty will continue to teach courses, SNHU will officially hire as many existing Daniel Webster College employees as possible, in a temporary employee status while transitioning them to regular SNHU employment status.

The teach-out agreement will be reviewed by the New England Association of Schools and Colleges (NEASC), the New Hampshire Commission of Higher Education and the U.S. Department of Education this week. SNHU will host information sessions on Daniel Webster College’s campus beginning on Wednesday, September 14.

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About Southern New Hampshire University

[Southern New Hampshire University](http://www.snhu.edu) (SNHU) is a nonprofit, regionally accredited, private university with an 80-year history of educating traditional-age students and working adults. With over 80,000 students and more than 200 undergraduate, graduate and certificate programs, available on campus in Manchester, NH and online, SNHU offers access to high quality and affordable education. Recognized as the “Most Innovative” regional university by U.S. News & World Report, SNHU continues to transform higher education by providing the best educational opportunity and experience for all students. Learn more at www.snhu.edu.

“I wish I could shake all of their hands.”

Participants reported that SNHU offered multiple informational sessions with the student body, to explain what was happening with DWC and the teach-out. Monica also stated that individual student meetings were arranged to address student concerns:

Yeah, there weren't issues because they (SNHU) were on top of it. They set us all up with meetings, it was incredible. They cleared out this big room, there were tables everywhere, and there were all these people there just to sit down with you, go over your transcripts, make sure everything was in order and that you were going to be able to graduate on time or do whatever you were going to be able to do. It was amazing, and they were really fast and efficient. It was like a war room, they had pizzas for the workers...it was just amazing. I was really impressed. Um, they explained that the parent company shut down and filed for bankruptcy, which is what happened, after the government came in and revoked its accreditation. Yeah. So they explained that part and what was going on, and how that side of things was in limbo, but they were coming in and doing everything...It wasn't that bad, I mean, because SNHU knew what they're doing, they had people burning the midnight oil, I'll tell you. I wish I could shake every one of their hands. Maybe I will someday.

Ally perceived that SNHU counselors were helpful throughout the transition, even if students indicated that they would not be continuing their education with SNHU:

I think they figured everyone was going to go to SNHU. That was the thing that was bad about the whole situation. Obviously they couldn't bring in counselors from every single college, that would be ridiculous. They were helpful with any college you wanted to

transfer to, they just assumed you were going to go to SNHU, and if you said you weren't they were like, 'oh, ok.'

Vincent reported his experience with the teach-out:

Well, it was kind of unusual. They, they didn't really take over classes, but kind of really took over classes. It's something that's very rare in the teaching community and what the upper education community calls a teach-out and this kind of taught me a lot about what a teach-out is and there have been a few teach-outs here in the state of New Hampshire. So, one of the teach-outs happened to be with, oh gosh, I want to say Hesser College or some other college. There was a liberal arts college, there was a liberal arts college that, that happened to and a few other different schools but in Department of Education timeline I believe there's only ever been six teach-outs. And the teach-out is basically when another school that has the same accreditation comes in and conducts, or teaches out, the remaining class. So, whatever, whoever is left in that class, and this past year, alright, I was a senior...So, I still graduated with a Daniel Webster college degree even though Southern New Hampshire University was conducting the teach-out. So, it was a little weird in that sense. So, Southern New Hampshire University essentially stepped in and became the financiers of my education.

When SNHU began the teach-out on the DWC campus, one aspect that caused confusion for participants was whether they were SNHU or DWC students. Ally explained her confusion:

People called it Daniel Webster, people called it SNHU. I believe it was still Daniel Webster. I got my dean's list letter in May (2017), and it said Daniel Webster. But I got my dean's list letter in January, for fall 2016 semester, and the stamp was SNHU. So, I'm fuzzy on that as well because nobody said 'yeah, we're SNHU now.' It was really weird;

no one knew what to call it. I kept calling it Daniel Webster because I didn't go to SNHU. To me it was still Daniel Webster, but SNHU was just above it all. I believe the people that graduated, graduated with Daniel Webster degrees, but they were the last people that will ever graduate with Daniel Webster degrees.

Another benefit of the teach-out was that SNHU was able to provide transcripts and other materials for participants who had transferred institutions. Patrick reported that he had no issues requesting his DWC transcripts from SNHU. Hannah reported that she was able to get a syllabus from SNHU for one of her DWC classes, a document that was needed for a transfer credit evaluation by her new college.

The majority of participants reported positive experiences with SNHU after the university began its teach-out. Participants felt as though SNHU did a good job of informing students about what transpired with DWC, maintaining classes for students that were close to graduation when the closure occurred, and supporting students' transfer to a new institution.

Transitions to a New College

While the majority of participants received financial aid to attend DWC, only two of the students reported having major issues with the financial aid office, issues that were resolved to students' satisfaction, and were not detrimental to the students' financial well being. All of the participants reported that they did not experience issues with transferring credit from DWC to another college or university.

Hannah, one of the two students who reported having issues with financial aid, described her experience with financial aid at DWC:

My financial aid was never originated, so it didn't go through. It was gibberish to me, but that was what I was told. None of the Pell grants or financial aid was sent to the school,

so nothing was refunded to me. So I ended up having a 7000 balance and it took me almost a year to get it cleared up. But the CFO eventually wiped all the debt because of the error on the school's part...they were having a lot of trouble in financial aid, and were being audited, so they erased my debt.

Hannah transferred out of DWC before official notification of the school closure, due to her issues with financial aid. She successfully enrolled at another institution, even taking with her the transfer credit that essentially she never paid for due to DWC's error.

Vincent, the second student to report issues with the DWC financial aid department, had initially enrolled in DWC shortly after it was acquired by ITT. Vincent stated that he was forced to discontinue enrollment for a semester because his G.I. Bill paperwork was not processed properly:

And that (participants financial aid problems) was because of the ITT thing. When ITT came in and took over they basically fired nearly everybody that was there working in financial aid -alright, and brought a whole new team in. Well this whole new team didn't have...had no idea what the hell was going on. They had no idea how to do the paperwork and that was kind of the downside of the conversion from Daniel Webster College to ITT. That was really the downfall, is that they fired a lot of people or they let go a lot of people, or a lot of people left of their own free will, and then you got these new people that weren't trained properly because they have this campus that's miles away from any other (ITT) campus, all right, and I don't think they really knew, that ITT really knew what they were getting into. When they finally hired someone that knew what the heck was going on...you know...the paperwork process that was supposed to happen, then the school became tolerable.

“It was very easy to transfer.”

Participants did not report any major problems with transferring credits from DWC to other institutions, either concerning getting transcripts sent from DWC or SNHU to other institutions, or having credits accepted at the new institution. Ally stated her surprise at the ease of transfer both from DWC and to UNH:

I was surprised at how easy it was. I hear about people losing credits, or how hard it is to transfer. UNH took all of my credits. I was surprised they took all of the credits. It was very easy to transfer. Daniel Webster made it easy to transfer as well because everyone was transferring. I believe my homeland security classes transferred in as electives. My two English courses transferred in as general ed. My math course, I want to say transferred in as gen ed, or possibly in my major. I'm not absolutely sure. I didn't put too much thought into it, but I started hearing people who had transferred to other places saying, 'They only took half my credits.' I was a little worried, that's hard earned money going to waste because they won't accept my courses that I took and worked hard for. UNH told me all my courses would transfer no problem, so I was quickly reassured.

Tim also reported surprise at how many of his DWC credits transferred in to his new institution:

At the time, they (UNH) made it pretty easy though, yeah, these are the ones that are transferring, I was pretty surprised though...they ended up giving me what, like 15 classes, so, I'm like wow that's not bad you know. And the other classes...I think only...two or three didn't get transferred in which wasn't an issue for me.

The participants in this study reported no major issues with either financial aid or transferring credits from DWC to their new institution. While two participants reported issues with financial aid prior to the DWC closure, those issues were resolved in a manner that was

satisfactory to the students. Participants reported that all or most of their DWC credits transferred to their new educational institution.

Influences on Student Choice

Participants identified a variety of factors that influenced the choices they made to continue their education after their experiences with DWC. The majority of participants decided to change their major and transfer to other institutions that offered the new major. Participants discussed looking for institutions that had smaller campuses and were close to home. Participants also reported choosing an institution that they were sure would not close before they completed their degree program. Participants who were close to graduation and assured by SNHU during the teach-out that they could complete their degrees on schedule stayed with the university. The majority of participants identified community colleges as a viable option for completing general education courses and exploring majors.

“UNH is not going to close. It’s a state school, so it can’t.”

After their experiences at DWC, participants were concerned with being able to finish their education uninterrupted, and felt that a public institution would be more reliable. Ally stated the following:

I have a lot of hope for higher education for myself because I know (UNH) will always be here. UNH is not just going to close, it’s a state school, so it can’t. But, it’s one less thing to worry about, not having to worry about school closing, not having to find another school, setting up appointments, learning about financial things, along with your work. It was a lot.

Tim also expressed his thoughts about the reliability of public institutions:

After going to Daniel Webster I might be a little be biased, but I've seen commercials for ITT Tech and stuff, but it kind just feels like in some aspects they're just greedy. I feel like public and private colleges are, um, more, uh, more reliable, maybe. Especially if they've been around for a long time, I'm not sure how long ITT Tech has been in business.

Both Ally and Tim had been interested in going to UNH after high school, but reported that they didn't have the grades to be admitted. UNH was within commuting distance for both, which also influenced their decision to apply.

Initially, Ally was going to stay with SNHU, but decided to change her major to Biological Sciences, which she stated SNHU did not provide as a major, so she applied to UNH. Patrick enrolled in UNH because he decided to change his major to Mechanical Engineering Technology, and claimed UNH provided classes within the MET major that better accommodated his work schedule. Tim reported that he knew he wanted to enroll in UNH after attending an open house and meeting faculty at the college:

I think UNH just won me over too fast, like, I didn't even bother going to SNHU. I didn't, and I was just worried about my credits transferring and UNH was like yeah, yeah, yeah, I (UNH) will take all your credits or the majority of them or the ones that mattered, at least.

“Ride that puppy to the end”

Before official announcement of the SNHU teach-out, Vincent, who was in the senior year of his program, had looked into transferring to UMASS Lowell, which was also an ABET accredited program. Vincent stated that he needed to graduate from an ABET accredited program to keep his employment with the government. When he learned that it would take him more than

a year to finish his degree, he decided to stay at DWC and see what would happen with SNHU. Once SNHU took over, and ABET agreed to allow their accreditation to stand until the end of the teach-out, Victor was able to finish his “ABET approved” degree.

Monica had somewhat similar concerns to Vincent. She enrolled in DWC because she wanted to be in the aviation industry, an industry in which the DWC name was extremely well respected. When the rumors of the DWC closure started, she was hopeful of a good outcome, and decided to, in her words, “ride that puppy to the end.” When SNHU took over DWC, Monica met with SNHU officials to discuss her options. SNHU assured her that her diploma would say “Daniel Webster College,” although her official transcripts had the SNHU school stamp.

Two participants, Patrick and Hannah, reported changing majors when transferring out of DWC. Both participants enrolled in local community colleges that offered pathways programs to a state university. Patrick explained his transition:

I ended up transferring back to New Hampshire Technical Institute to get my degree in mechanical engineering technology. So I realized when I was at Daniel Webster that the program was mechanical engineering, and I would have to take a lot of classes to get my degree... I already had an associate’s from New Hampshire Technical Institute in architectural engineering. It was going to be shorter for me to — actually, I did try to directly transfer to UNH Manchester but they told me I needed to have an associate degree from New Hampshire Technical Institute first to get into mechanical engineering technology. So that’s sort of part of the reason I transferred to New Hampshire Technical Institute and I went back to my old school. Another reason was at Daniel Webster it was a very small school and it didn’t have a lot of flexibility with classes. I was working full

time, I was working the day shift, and they didn't have a lot of night classes. But New Hampshire Technical Institute did have a lot of night classes. And that was very much the two reasons I moved back to NHTI, and then transferred to UNH.

Hannah spoke to the financial benefits of attending community college:

For financial aid I found the smartest thing to do was to go through community college to do gen ed stuff. Then figure out what you want to do by taking classes, because it is much cheaper.

Both Vincent and Tim also spoke about community college as a less expensive alternative for completing general education courses. Tim stated:

Well, from a money perspective I feel like starting out at community college and getting your general education is a plus. Then when choosing a university to go to, definitely go to open house, visit, meet some faculty before choosing.

Ally suggested that enrolling in community college for major exploration was a good option:

Choosing a major is difficult, especially when you're young because nobody knows what they want to do. So, if you are really stuck on your major, don't have any idea about what you want to do, I would tell them go to a community college and get your gen eds out of the way, or go in undeclared. Don't just pick a major just because, that's going to put you in the wrong direction and you're going to end up unhappy if you don't like it. That's what I would suggest at first, I thought about doing that but I really wanted to major in homeland security then, shocker, I changed my major not even a year later.

In the discussion of how they chose how they were to continue their education, participants reported a variety of influences, the most important being an institution that would allow an uninterrupted completion of a degree program. Participants also perceived the closure

as an opportunity to explore major options, and enroll in an institution that offered their desired major. These discussions brought about participants' perceptions of 'reliable' institutions of higher education, identifying public education in general, with an emphasis on community colleges as options for general education course completion and major exploration.

Perceptions of Higher Education

Upon reflection, participants expressed a positive view regarding their experiences in higher education. Participants discussed their perceptions of the necessity of obtaining an academic degree in order to achieve their goals. Monica discussed how she made contacts through school helped her explore options in her career field:

It's not just the learning, it's the contacts you make and the people you cultivate in the real world. They hooked me up with big people at (company), but I didn't want to move to Wichita, no thank you. It's about the contacts, not just what you learn. When you're there take advantage of the internships and everything. I don't see why people would be sorry they went to college, except for the student loans.

Patrick expressed that although working full-time throughout his education has had its challenges, he feels the combination of education and experience will work to his benefit:

I think it was a little bit of everything, and being able to work while I was going to school, to learn about employers and how they think. I always joke with other students about working. We say we have everything to do the job; we just need to get that piece of paper. But both have helped. It's been hard in my personal life because I haven't had the same freedom as other people. I'm taking a class this summer, I have to study, I can't go out. I just have to do it, my other friends don't have that responsibility, but at the same time I know there's a higher purpose and that my sacrifices will pay off.

“Outside of my comfort zone...”

Some participants reported that their experiences in higher education helped them come to realizations about themselves, and their own place in higher education. Tim reported that his experiences in higher education made him feel grateful for his own opportunities:

For the most part it has made me feel how lucky I am to go to college, because most people don't have that option. For as much as I procrastinate or hand in sloppy work, in the end I always realize it is important to do well because most people don't have the opportunity that I have, and that kind of fuels the fire and makes me try really hard. Usually it's at the end of the semester when I try the most, it has always been a struggle for me to read and study, it's the last thing I want to do, but it has been a realization for me, that I'm really lucky....My high school that I went to was like 90% or 95% wealthy, the majority of them went to college. But like, you look at inner city people, you meet a few people, and they don't have the opportunity, they have full-time jobs at McDonalds and stuff, I just couldn't imagine. I work at (a retail store) and I make like \$8000/year, you spend like \$20000 a year just on school. It's just impossible if you don't make a wage. You're fortunate (if you're from) a family that can afford, or for the most part afford it, you're very fortunate in this day and age, I should say... It gives you an edge competitively against everyone else. Overall you're going to have probably a wealthier, better life, if you get a good job that you can support a family, buying a house, and not living paycheck to paycheck. I would definitely recommend people to go to college. I'm not looking forward to getting out of college, but going to college is a good thing.

Ally expressed similar feelings of gratitude:

I feel better about myself, I feel smarter. I never really felt intelligent and now I take pride in knowing things and being the smart one. Out of my friend group I'm the only one going above and beyond in health care. I'm the only one, it's a long road, but overall I'm really happy with how education has treated me, what it has given me, I'm very grateful for that. I don't take anything for granted anymore, especially with education. I feel really good about myself now, because of school I feel like I'm doing something with my life.

Hannah discussed her academic growth:

I like math, before I used to think I hated it and think I wasn't good at it, but I'm actually very good at it. I learned that I actually do like people and taking classes that aren't applicable (to her major). I never thought of myself as a business major, I just took it because I was closer to getting a degree. But out of the classes I took, I learned that I enjoy learning about how people think, and communication skills, and interactions overall, and how they can be influenced...I took a humanities class last semester in Greek philosophy, and it was something I wouldn't normally take, and it was a very different way of thinking outside of my comfort zone, and it was very enlightening overall to take it and listen to someone else's passion and learn more about it.

Both Tim and Ally reported that their experiences in higher education have helped them become more serious students:

Tim: A lot of the classes at DWC were a breeze, you know, you didn't really have to try to get an A+. Then I came to UNH and was like wow, I really have to start trying now to get a good grade. It made me realize that I had the opportunity to get a good degree. So, I

have to put the time and effort into it, instead of just riding a roller coaster that I didn't have to put any effort into. I had to come a long way.

Ally: It has impacted my life because it helped me better myself. To push through, to get through the class, especially with biology, you have to get your math and science skills down, you can't just slide through the class. You need to memorize it, carry it through your life. Higher education has helped me feel more fulfilled and learn more. I have the ability, because of higher education, to do what I want with my life. Without that, I would be working in retail for the rest of my life, and that would be miserable.

“You need to go to college to survive.”

Along with their overall views on higher education, many participants shared their perceptions on the necessity of obtaining a college degree. Patrick described his professional experiences regarding higher education attainment:

There's a limit to how much you can do with a high school diploma, with your job, the company will take you, but there's a limit, and you can't go beyond that. Even, I work in a factory, and I do see little differences between how people working on the factory floor get treated by the management, there are differences. There's a flexibility that, if you're an engineer, you get with work. If you're on the floor you have to be at work at this time, and you only get a break at this time. You get more money, I mean. It's not just better money, but so many other things. If you want to change your job, or go somewhere else, it makes it so much easier if you have a degree.

Tim discussed a similar view:

I've always had the same view on higher education. I feel it's a necessity in this time and world. You can get away with an associate's degree, but you're better off with a

bachelor's or a master's degree. I've known that since I got out of high school. With that mentality I don't think my mind changed very much, just the seriousness (that I take) in classes kind of changed.

Ally described college as a necessity in achieving her personal goals:

You need to go to college to survive, nowadays. You just need to, in my personal opinion. I mean, you can have a happy life if you would like working in retail, or having a minimum wage job. However, to financially support a family, or to live a more comfortable life, and for self-fulfillment as well. If you don't want to go to higher education no one is making you, but I strongly encourage going to college and I value education, because that's what is going to get you through life. People value someone who has a lot of education under their belt, and I know that, which is why I'm choosing the direction I'm going in. I want to feel self-fulfilled and financially support my family. I knew I would have to be able to financially support a family because of who I am and I cannot naturally reproduce because I'm a lesbian, so I need to either be able to afford to have children or just don't, but I do want to have children. That's why I'm choosing to go into higher education, I know that sounds weird, but I've always had that in the back of my mind, that I'm going to need to afford to have kids. I can't just decide on a whim that I want them. It's going to take a lot of planning and money. I would encourage anyone to go to college.

Participants expressed positive views towards higher education, regardless their experiences with the DWC closure. The majority of participants felt that it was necessary to obtain a college degree and were optimistic that their academic experiences were going to be of benefit in accomplishing their professional and personal goals.

Conclusion

The primary research question for this study sought to understand how the students of a for-profit college experienced the institution's closure. The secondary questions concerned specific aspects of the student experience, including notification of the closure, perceptions of support services, student issues with financial aid or transfer credits, and the influences on how participants chose to continue their education after notification of the closure. Prior literature (U.S. Senate, 2010) guided the development of financial aid and transfer credit themes in the data, while other themes were emergent, and based on the data collected. The reports of the participants in this study presented a very clear view of their experiences throughout the "process" of the closure of DWC, and their subsequent transitions.

Lack of Institutional Communication

Regardless of demographics, backgrounds, or majors, participants had very similar experiences leading up to the school closure. Participants perceived a lack of effective communication by DWC regarding their academic future, which led to participants' reports of feeling confused, frustrated, and fearful that they would not be able to complete their educational program. Some participants also reported concern because employment in their chosen field depended on DWC accreditation or the name of DWC on their transcripts or diploma. Participants perceived their classmates leaving the college in droves, as they described it, and many participants didn't know whether to continue through the uncertainty, or find another school in which to enroll. Furthermore, many participants described an awareness of faculty discontent during this period, some having conversations with faculty which exasperated, rather than helped their negative experiences. The lack of adequate communication continued with the

official notification of DWC's closure, as participants reported receiving official notification of the closure through different means within a period of two months.

Ease of Transitions

Participants reported no difficulties in transferring to new institutions. Participants reported that the communication processes with students greatly improved with the teach-out. SNHU provided explanations of what had occurred with DWC, and provided a pathway for students who wished to finish their DWC degrees. SNHU also provided advising for students who wanted to transfer, and eased their transfer process by issuing transcripts in a timely manner, allowing students to quickly complete admissions requirements at other institutions.

Impacts of the Closure

Participants reported perceptions of higher education which influenced how they chose a new institution in which to enroll. Participants perceived DWC as an "easy" school, although some attributed this perceived lack of academic rigor to the school's ownership by ITT, while others perceived it as an effect of low faculty morale due to rumors of the closure. After their experiences with DWC, many participants reported that they wanted to enroll in a school that provided them the ability to finish their educational program, without having the fear that school would close. Some participants reported being challenged academically for the first time by the courses at their new institution, which they perceived as positive. Ally stated that attending her new school gave her a sense of pride, and she knew she could achieve her goals. Ally and Tim both reported their high school GPA's were fairly low, which limited their options for college after graduation, however both were admitted to a state school due to the GPA each had acquired at DWC. Ally was also able to change her major to biological sciences, a major that she had always wanted, but was not offered at DWC. Further, both participants reported that their

experiences at DWC and the strenuous nature of coursework at their new school helped them to become more serious students.

Overall, the findings of this study showed a minimal negative impact on the participants enrolled in Daniel Webster College during and after the school's closure, and many positive impacts. Participants were able to graduate from their desired program and gain employment in their intended field, or transfer to traditional higher education institutions with no issues or hardships.

CHAPTER 5

DISCUSSION AND RECOMMENDATIONS

In this study an exploration of the experiences of students enrolled in a for-profit college that suspended operations was conducted to gain a greater understanding of the school-closure phenomenon from the student perspective. The revealed the experiences and perceptions of participants in their own words, which provided an understanding of the impact of both policy and policy implementation on the Daniel Webster College student demographic. Conclusions from the findings were aligned with the research questions, and were synthesized into three different categories: lack of institutional communication, ease of transfer, and impact of the school closure.

The findings of this study were surprising in that they revealed positive participant outcomes, including graduation, employment, and transferability into traditional higher education institutions. In this chapter a discussion of the findings as related to existing literature on for-profit colleges will be presented within the framework of the study described in chapter two. Existing literature on the for-profit education sector regarding both the criticisms and strengths of the for-profit model will be incorporated into this discussion, as will dialogue on neoliberalism in higher education policy, and social justice issues when considering the findings. This discourse will provide clarity on the data and provide explanations for the findings. This discussion will also show that these findings are limited to the type of for-profit institution that existed within the structure of Daniel Webster College, and can't be generalized to the larger for-profit student demographic. Finally, recommendations based on the findings of this study are presented. These recommendations are aimed towards federal neoliberal higher education policy

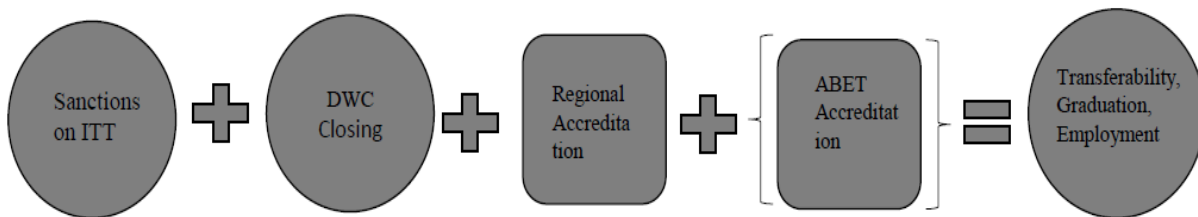
towards workforce education, and safeguards for students enrolled in for-profit schools that are sanctioned by the Department of Education.

Structural Safety Nets

Findings from this study did not support the assumption made in chapter one that higher education policy towards the privatization perpetuate social stratification and fail the student constituency. During data analysis findings emerged that were contradictory to the current literature around transferability of educational credits and financial aid issues experienced by students enrolled in the for-profit sector. Participants did not reporting issues with transfer credits, debt or financial aid hardships that were outlined in literature such as the Harkin Report (2012). In chapter one I also discussed the gap in literature surrounding various types of non-profit institutions, and this study concerned a type of for-profit institution not addressed in current research. DWC was a private, non-profit college that was acquired by a for-profit corporation. It was a regionally accredited, ABET accredited institution with a good reputation in the aviation community. In chapter two I discussed how both policy and policy implementation contributed to the outcomes experienced by the student demographic. In my discussion of policy impacts on the student demographic I pointed to policy and policy implementation that best served students as containing a student advocacy component within the creation of the policy. However, in my review of the findings and the characteristics of DWC I saw that there were safety nets embedded in the structure of the college that positively impacted student outcomes. These embedded safety nets were the college's regional accreditation and ABET accreditation (Figure 17). According to the findings, regional accreditation benefitted all participants, as it gave them transferable academic credit. ABET accreditation was also a safety net built into the

structure of the institution. While ABET accreditation did not impact all students, it was an important factor in the engineering major, and tied to employment within the engineering field.

FIGURE 17. Policy Effects on DWC Students



Structural safety nets served to empower students, giving them the ability to transfer to a traditional institution, graduate, or gain employment. While participants mentioned receiving information regarding loan forgiveness application from the Department of Education, no participant was eligible to apply for the program, due to their ability to transfer academic credits.

Accreditation and Transfer

Literature discussing the lack of transferability of educational credits from for-profit institutions (U.S. Senate, 2012) imply that these credits are less valuable than credits from traditional institutions, in that they are often not recognized by traditional institutions. Findings show that participants in this study reported no issues in transferring credits to traditional institutions. This paradox is explained in considering the unique history of Daniel Webster College. As identified in the Harkin Report, DWC was regionally accredited through NEASC, allowing students to transfer credits to other NEASC accredited institutions.

As discussed by one participant, the ABET accreditation of DWC was in danger of being revoked due to the sanctioning of ITT. According to Vincent, had this accreditation been revoked, it would have threatened not only his ability to transfer to another ABET accredited engineering program, but his employment status. His internship and subsequent employment from that internship required graduation from an ABET accredited engineering program.

A secondary safety net for DWC students was the ability and willingness of Southern New Hampshire University to provide a teach-out. I describe the teach-out as a secondary safety net because the teach-out would not have been possible had it not been for the regional accreditation of DWC. Due to the sanctions placed on ITT by the Department of Education DWC was in danger of losing its accreditation through NEASC. Had the college lost its NEASC accreditation the academic credits would not have been equivalent to other NEASC accredited institutions, in which case DWC students would have had more difficulty transferring credits. However, the teach-out by SNHU extended DWC's accreditation status and therefore the transferability of credits.

The history of DWC and its reputation in the aviation community was also a secondary safety net for students enrolled in the aviation management program at the college. The college still maintained a good reputation in the aviation community, as described by one participant enrolled in the program. Monica, who was greatly involved within that community, maintained that a degree from DWC was crucial for her future employment in the sector. She voiced this concern to SNHU staff during the teach-out, who assured her that she would receive a DWC diploma even though her official academic transcripts are from SNHU.

Regional Accreditation and Academic Quality

The Harkin Report (2012) revealed that DWC was an anomaly within the ITT corporate structure, as it was a regionally accredited institution. The report further identifies a distinction between regional and national accreditation, in that regional accreditors have stricter standards for academic quality than national accreditors (p. 143). Further, the report contained this statement regarding accreditation (p.141):

Accreditation has traditionally existed as “a process of external quality review created and used by higher education to scrutinize colleges, universities, and programs for

quality assurance and quality improvement.” Once granted accreditation can be good for up to a 10-year period, although factors like change of ownership or the addition of new campuses may trigger a review by an accreditation team.

This finding raises questions about the NEASC accreditation of DWC after its acquisition by ITT in 2009. There exists a variation in academic quality between institutions, however I assume the accreditation standards of institutions within the scope of the same accreditor should be consistent. Based on the perceptions of participants in this study, the academic quality of programs at DWC was questionable, at least in the semesters leading up to the closure. The statement made by a faculty member to a participant within the first finding, in which the faculty member disparaged the quality of education at the college, supported participant perception of a lack of academic rigor. Further, the statement of the former president of DWC outlined in the Harkin Report explained that curriculum for DWC classes was provided to faculty, rather than developed by faculty. In my search of the NEASC website, the only information I found regarding DWC or its accreditation was the joint press release mentioned in chapter four. I found no evidence that NEASC reviewed the accreditation of DWC after it had been acquired by ITT. The joint press release by NEASC and DWC in the findings revealed that DWC was schedule for a regular ten-year accreditation review in 2016.

Social Justice and Accreditation

The social justice implications around the accreditation of DWC are evident when comparing the findings of this study to existing literature on students enrolled in for-profit institutions. Safety nets were embedded in the structure of DWC through regional and ABET accreditation, and were continued through the teach-out agreement with SNHU, thereby safeguarding the transferability of academic credits for students. Findings show that participants

did not experience financial hardship, undue student loan debt, or having to start their college education from the beginning due to non-transferable credits.

Social stratifications theorists (Shapiro, 2004, Lareau, 2011, Cottom, 2017) contend that the fewer resources or assets one possesses, the greater the impact of negative consequences are realized. The Harkin Report (2012) discussed the inability of students enrolled in for-profit schools to transfer credits to traditional institutions, which was not the case with the participants in this study. The safety nets of regional and ABET accreditation present in the structure of DWC served as assets and facilitated positive participant outcomes. If the accreditation of an institution is a factor in the transfer academic credits, or the need to start their education from the beginning after a college closes, it presents a social justice issue. Furthermore, if students are unable to obtain employment due to employer requirements around accreditation of an educational institution from which they graduated, social justice issues arise from the neoliberal policy that loosened accreditation restrictions for Title IV funding.

Transparency in the For-Profit Sector

The Harkin Report (2012) identified a lack of transparency exhibited within the for-profit sector regarding financial aid and return on investment. Following neoliberal ideology, a lack of transparency was beneficial to the private sector colleges due to increased profits and growth, therefore stimulating the economy. Findings from this study show that Daniel Webster College students experienced a lack of transparency not only with their enrollment in the institution, but throughout the closure process of the school. In its acquisition of DWC, ITT Education Services was able to broaden its customer base beyond the typical student demographic enrolled in a for-profit college (U.S. Senate, 2012). This assumption is based on findings from this study that the majority of participants were unaware of ITT's ownership of the institution upon their

enrollment in DWC. It wasn't until sanctions were imposed upon ITT by the Department of Education that students realized they were enrolled in a college owned by ITT. Several participants made comments that led to the assumption that if they had known about ITT's ownership of the DWC they may not have enrolled in the school. In clarification, many participants did not express negative views of the for-profit education sector as a whole, but rather ITT specifically. Participants were aware of ITT through television and popular media. Neoliberal capitalist ideology would dictate that it is the responsibility of the consumer to understand the product before purchase, in this case the consumer being the student and the product being the school program. However, in discussions of social capital, social stratification theorists contend that the resources within a family contribute to the educational decisions made by students (Lareau, 2011; Shapiro, 2011). The history and reputation of DWC combined with the lack of transparency surrounding the ownership of DWC negated social capital as a resource, because neither the majority of participants or their families were aware of the connection between ITT and DWC when enrolling in the college. Had the ownership of DWC been more transparent, students would have been empowered to make an informed decision on whether or not to enroll in the institution.

According to the findings, participants' classmates were leaving the college in the months prior to the closure due to the lack of communication with the student body around a possible closure. This lack of transparency regarding the direction that DWC was heading led to rumors and a disruption of the educational experience for students. Further, in examination of the timeline leading up to the closure, some participants questioned why DWC would enroll new students during the last semester of operations because it seemingly presented undue hardships to incoming students. Ultimately, the lack of transparency around ITT's ownership of DWC and the

lack of communication about the closure was beneficial for the college but caused hardships for the students.

The lack of transparency directly contradicts the literature on the for-profit sector which claims that colleges offer customer service to students that is above par of that offered by traditional institutions (Ruch, 2001; Howard-Vital, 2006; Deming et al., 2013). In examining the circumstances surrounding the closure of DWC, the conclusion can be drawn that good customer service in the for-profit sector is practiced when the outcome of that service benefits investors of the institution, such as increased enrollment. In the case of the DWC closure, an event that lacked profit potential for ITT, the practice of good customer service was noticeably absent. This is evident in claims of participants of the perceived lack of resources prior to the closure. Participants' perceptions of diminishing staffing at the college, inability to access classrooms and labs, and issues with financial aid processing support this conclusion.

Benefits and Access

A surprising finding emerging from the data in this study concerns the impact of the closure on participants, as many participants reported positive consequences stemming from the DWC closure. Participants who continued to graduation with SNHU were able to complete their degree programs to their satisfaction. This included the ability to complete a degree backed by an ABET accreditation for one participant, and obtaining a DWC diploma for another participant, both being important to each participant's career field, respectively.

Other participants reported that their tenure at DWC had enabled them to obtain a college GPA that guaranteed them admittance to a traditional institution of higher education. Further, participants reported a greater appreciation for what they considered the "quality" education that they associated with their new institution. Participants who continued on to a traditional

institution felt that they became more serious about their education due to their perception of greater academic vigor within their programs. While these reports support literature that claims for-profit education as a beneficial way for underserved students to access higher education (Miller, 2001) there is a caveat that must accompany this finding. The caveat being that the safety nets built into the structure of DWC allowed for the positive consequences experienced by participants.

Conclusion

The neoliberal capitalist political ideology surrounding policy decisions that allowed for the rapid growth of the for-profit education sector is rooted in the belief that unregulated markets will stimulate the economy. According to this ideology, the free-market results in economic stimulation and provides benefits towards the social good. The policy allowing for-profit institutions to access Title IV was focused on the demands of the labor market (Cottom, 2017), without consideration for how policy would impact the student demographic. The cultural hegemony instilled by this ideology spurred students to enroll in for-profit institutions in order to keep up with perceived labor market demands. The literature on the for-profit sector (U.S.Senate, 2012; Deming et al., 2013; Liu et al., 2014) suggests that enrollment in the for-profit education sector produces negative student outcomes.

This study provided a different view of the for-profit sector. The findings showed that after the for-profit institution in which they were enrolled closed participants were able to graduate, gain employment, or transferred academic credits with relative ease. Findings also showed that participants gained access to traditional higher education institutions due to their enrollment in a for-profit college. The participants in this study experienced minimal negative consequences from policy surrounding the for-profit education sector due to the type of for-profit

institution at which they were enrolled. The history, reputation, and accreditations that Daniel Webster College held were assets to the participants that allowed for positive student outcomes. This study contributes to the research on the for-profit higher education sector by focusing on a particular type of for-profit college, one that had a history of being a regionally accredited non-profit, private institution. This history contributed to the demographic of student who enrolled in the college, and participants were not the typical students enrolled in for-profit colleges, even if they shared some of the socioeconomic characteristics. This focus greatly limits the findings of this study, but shows that care should be taken in generalizing a whole sector of education.

Finally, implications of the findings point to the importance of regional accreditation as a safeguard to student outcomes. Regional accreditation empowers students enrolled in an institution that closes as it provides students the ability to transfer academic credits to other higher education institutions and continue their education. The policy towards privatization of higher education loosened the restrictions on institutional accreditation, taking away the safety net of regional accreditation as a requirement to accessing Title IV funding, and creating a barrier to transferring academic credits to traditional institutions.

Recommendations

With the tide of neoliberalism dominating the current political atmosphere it is necessary to fully realize the impact of this ideology on higher education. This study suggested the importance of regional accreditation in positive student outcomes, but restrictions on institutional accreditation were loosened for colleges as a requirement to participate in Title IV funding. Based on the findings of this study, two recommendations emerge concerning the for-profit education sector. The first is to tighten restrictions around accreditation and require that for-profit institutions obtain regional accreditation when offering degree programs to insure

academic credit transferability in case of a school closure. The second recommendation is that for-profit colleges that may not be regionally accredited, but are well respected within a certain industries can participate in Title IV programs. This recommendation stems from the finding that the reputation of DWC in the aviation industry had a positive impact on student outcomes. For-profit educational institutions should be able to take part in Title IV programs, but with restrictions to their program offerings. For-profit technical schools have always served to offer technical certificates to particular segments of the workforce, and in some professions for-profit trade schools are the only option for certification. Policymakers need to recognize the differences between technical degrees and academic degrees and restrict Title IV funding to institutions that specialize in each type of program.

The topic of community colleges was recurring among participants in this study. The majority of participants mentioned community colleges as cost-effective options for completing general education requirements or exploring majors when starting college. Community colleges are already regionally accredited institutions. In looking at successful policy for underserved students such as TRIO or the Carl Perkins Act, many of these programs are implemented at community colleges. As discussed in research on the for-profit sector (Deming, et al. 2013) community colleges offer a better return on investment for students than for-profit schools, but currently community college systems are under-funded and over-crowded. Investing in community college systems and expanding proven policy towards underserved student populations need to be considered as a viable solution to workforce education. Higher education is a public good that should be beneficial to the student constituency. When establishing policy the student demographic who will be most affected by the policy must be represented. The

strength of the CTE policy mentioned in chapter two was that all constituencies were represented: educational institutions, business and industry, and student advocates.

Further research exploring the experiences of students enrolled in differing types of for-profit institutions is needed to understand the full scope of policy impact on student outcomes. Daniel Webster College was a non-profit private college that became a for-profit college. ITT's acquisition of DWC and the ensuing aftermath of the acquisition raised questions on the melding of the for-profit and traditional models of higher education. Literature discussing "hybrid" models of education have emerged, in which non-profit institutions are taking on practices of the for-profit sector (Newton, 2016) in order to streamline processes and save money. More research on the impact of the for-profit structure of education needs to be done so that non-profit institutions are considering safeguards to student outcomes when incorporating this model of education.

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APPENDIX A

<http://www.ittesi.com/2016-09-06-ITT-Educational-Services-Inc-to-Cease-Operations-at-all-ITT-Technical-Institutes-Following-Federal-Actions>

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News Releases

ITT Educational Services, Inc. to Cease Operations at all ITT Technical Institutes Following Federal Actions

Sep 6, 2016

CARMEL, Ind., Sept. 6, 2016 /[PRNewswire](#)/ -- Today, ITT Educational Services, Inc. released the following statement:

"It is with profound regret that we must report that ITT Educational Services, Inc. will discontinue academic operations at all of its ITT Technical Institutes permanently after more than 50 years of continuous service. With what we believe is a complete disregard by the U.S. Department of Education for due process to the company, hundreds of thousands of current students and alumni and more than 8,000 employees will be negatively affected.

The actions of and sanctions from the U.S. Department of Education have forced us to cease operations of the ITT Technical Institutes, and we will not be offering our September quarter. We reached this decision only after having exhausted the exploration of alternatives, including transfer of the schools to a non-profit or public institution.

Effective today, the company has eliminated the positions of the overwhelming majority of our more than 8,000 employees. Our focus and priority with our remaining staff is on helping the tens of thousands of unexpectedly displaced students with their records and future educational options.

This action of our federal regulator to increase our surety requirement to 40 percent of our Title IV federal funding and place our schools under "Heightened Cash Monitoring Level 2," forced us to conclude that we can no longer continue to operate our ITT Tech campuses and provide our students with the quality education they expect and deserve.

For more than half a century, ITT Tech has helped hundreds of thousands of non-traditional and underserved students improve their lives through career-focused technical education. Thousands of employers have relied on our institutions for skilled workers in high-demand fields. We have been a mainstay in more than 130 communities that we served nationwide, as well as an engine of economic activity and a positive innovator in the higher-education sector.

This federal action will also disrupt the lives of thousands of hardworking ITT Tech employees and their families. More than 8,000 ITT Tech employees are now without a job – employees who exhibited the utmost dedication in serving our students.

We have always carefully managed expenses to align with our enrollments. We had no intention prior to the receipt of the most recent sanctions of closing down despite the challenging regulatory environment that now threatens all proprietary higher education. We have also always worked tirelessly to ensure compliance with all applicable laws and regulations, and to uphold our ethic of continuous improvement. When we have received inquiries from regulators, we have always been responsive and cooperative. Despite our ongoing service to this nation's employers, local communities and underserved students, these federal actions will result in the closure of the ITT Technical Institutes without any opportunity to pursue our right to due process.

These unwarranted actions, taken without proving a single allegation, are a "[lawless execution](#)," as noted by a recent editorial in The Wall Street Journal. We were not provided with a hearing or an appeal. Alternatives that we strongly believe would have better served students, employees, and taxpayers were rejected. The damage done to our students and employees, as well as to our shareholders and the American taxpayers, is irrevocable.

We believe the government's action was inappropriate and unconstitutional, however, with the ITT Technical Institutes ceasing operations, it will now likely rest on other parties to understand these reprehensible actions and to take action to attempt to prevent this from happening again."

SOURCE ITT Educational Services, Inc.

For further information: Nicole Elam, ITT Educational Services, Inc., 13000 N. Meridian St., Carmel, Ind. 46032, 317-706-9200

APPENDIX B

NCES Table.

Table 317.50. Degree-granting postsecondary institutions that have closed their doors, by control and level of institution: 1969-70 through 2014-15

Year	All institutions			Public			Private								
	Total	4-year	2-year	Total	4-year	2-year	Total			Nonprofit			For-profit		
							Total	4-year	2-year	Total	4-year	2-year	Total	4-year	2-year
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
1969-70	24	10	14	5	1	4	19	9	10	—	—	—	—	—	—
1970-71	35	10	25	11	0	11	24	10	14	—	—	—	—	—	—
1971-72	14	5	9	3	0	3	11	5	6	—	—	—	—	—	—
1972-73	21	12	9	4	0	4	17	12	5	—	—	—	—	—	—
1973-74	20	12	8	1	0	1	19	12	7	—	—	—	—	—	—
1974-75	18	13	5	4	0	4	14	13	1	—	—	—	—	—	—
1975-76	9	7	2	2	1	1	7	6	1	—	—	—	—	—	—
1976-77	9	6	3	0	0	0	9	6	3	—	—	—	—	—	—
1977-78	12	9	3	0	0	0	12	9	3	—	—	—	—	—	—
1978-79	9	4	5	0	0	0	9	4	5	—	—	—	—	—	—
1979-80	6	5	1	0	0	0	6	5	1	—	—	—	—	—	—
1980-81	4	3	1	0	0	0	4	3	1	—	—	—	—	—	—
1981-82	7	6	1	0	0	0	7	6	1	—	—	—	—	—	—
1982-83	7	4	3	0	0	0	7	4	3	—	—	—	—	—	—
1983-84	5	5	0	1	1	0	4	4	0	—	—	—	—	—	—
1984-85	4	4	0	0	0	0	4	4	0	—	—	—	—	—	—
1985-86	12	8	4	1	1	0	11	7	4	—	—	—	—	—	—
1986-87 and 1987-88	26	19	7	1	0	1	25	19	6	—	—	—	—	—	—
1988-89	14	6	8	0	0	0	14	6	8	—	—	—	—	—	—
1989-90	19	8	11	0	0	0	19	8	11	—	—	—	—	—	—
1990-91	18	6	12	0	0	0	18	6	12	7	5	2	11	1	10
1991-92	26	8	18	1	0	1	25	8	17	8	7	1	17	1	16
1992-93	23	6	17	0	0	0	23	6	17	6	5	1	17	1	16
1993-94	38	11	27	1	0	1	37	11	26	13	10	3	24	1	23
1994-95	15	8	7	2	0	2	13	8	5	8	7	1	5	1	4
1995-96	21	8	13	1	1	0	20	7	13	9	7	2	11	0	11
1996-97	36	13	23	2	0	2	34	13	21	14	10	4	20	3	17
1997-98	5	0	5	0	0	0	5	0	5	1	0	1	4	0	4
1998-99	7	1	6	1	0	1	6	1	5	2	0	2	4	1	3
1999-2000	16	3	13	3	0	3	13	3	10	8	3	5	5	0	5
2000-01	14	9	5	0	0	0	14	9	5	8	8	0	6	1	5
2001-02	14	2	12	0	0	0	14	2	12	1	1	0	13	1	12
2002-03	13	7	6	0	0	0	13	7	6	6	6	0	7	1	6
2003-04	12	5	7	0	0	0	12	5	7	8	5	3	4	0	4
2004-05	3	1	2	0	0	0	3	1	2	1	1	0	2	0	2
2005-06	11	6	5	1	1	0	10	5	5	5	4	1	5	1	4
2006-07	13	4	9	0	0	0	13	4	9	6	4	2	7	0	7
2007-08	26	10	16	0	0	0	26	10	16	9	6	3	17	4	13
2008-09	16	6	10	0	0	0	16	6	10	6	5	1	10	1	9
2009-10	17	11	6	0	0	0	17	11	6	9	9	0	8	2	6
2010-11	20	9	11	0	0	0	20	9	11	7	6	1	13	3	10
2011-12	10	5	5	4	0	4	6	5	1	2	2	0	4	3	1
2012-13	21	3	18	1	1	0	20	2	18	4	2	2	16	0	16
2013-14	20	8	12	1	1	0	19	7	12	4	3	1	15	4	11
2014-15	54	7	47	0	0	0	54	7	47	5	3	2	49	4	45

—Not available.

NOTE: This table indicates the year by which the institution no longer operated (generally it closed at the end of or during the prior year). Data through 1995-96 are for institutions of higher education, while later data are for degree-granting institutions. Degree-granting institutions grant associate's or higher degrees and participate in Title IV federal financial aid programs. The degree-granting classification is very similar to the earlier higher education classification, but it includes more 2-year colleges and excludes a few higher education institutions that did not grant degrees.

SOURCE: U.S. Department of Education, National Center for Education Statistics, *Education Directory, Higher Education*, 1969-70 through 1974-75; *Education Directory, Colleges and Universities*, 1975-76 through 1985-86; 1982-83 *Supplement to the Education Directory, Colleges and Universities*; Integrated Postsecondary Education Data System (IPEDS), "Institutional Characteristics Survey" (IPEDS-IC:86-99); and IPEDS Fall 2000 through Fall 2014, Institutional Characteristics component. (This table was prepared July 2016.)

APPENDIX C



University of New Hampshire

INSTITUTIONAL REVIEW BOARD FOR THE PROTECTION OF HUMAN SUBJECTS IN RESEARCH

REQUEST FOR IRB REVIEW

General Information:

Applicant's Name Jennifer Logsdon Position Student Today's Date 5/12/17

UNH ID # (if student) 941849321 Dept/Center/Institute Education

Campus/Home Address:

Email Address(es) jkt44@wildcats.unh.edu Day Phone (603) 512-9573

Research Project Title Aftermath of a New England For-Profit College Closure on Enrolled Non-Traditional Students

Anticipated Project Start Date** 6/1/17 Anticipated End Date 12/1/17

** UNH Policy on the Use of Human Subjects in Research prohibits the start of any research activity (including canvassing and recruiting of subjects) that has not been reviewed by, and received written approval without contingency from, the IRB.

Project Status Information (please check one):

New Project [X]

Modification to Existing Project [] If Yes, provide IRB #

Project Funding Information (for sponsored projects only ~ include internal & external funding):

Has a proposal for funding been submitted to a sponsor? Yes [] No [X] If a proposal has been submitted, has the project been funded yet? Yes [] No []

Sponsor PI on proposal if not IRB applicant

Is notification of IRB approval required by the sponsor? Yes [] No [X] If yes, notification deadline

For externally-funded projects only: By initialing this statement, the applicant certifies that (s)he: Has read the applicable UNH policy on financial conflict of interest in research... and has made all required financial disclosures...

Review by Non-UNH IRB(s) (if applicable):

If this project has been submitted to a review board at another institution, provide the review date and that board's recommendations. Please attach relevant correspondence.

Name of Institution Date of Review

FOR IRB USE ONLY
PROTOCOL #
DATE RECEIVED

Subject/Participant Information:

Minimum number of subjects/participants by age and, if applicable, by status (complete for all that apply to this study)

# _____	Newborns/Infants	# _____	Institutionalized (e.g., nursing home residents)
# _____	Children aged 2-12 years of age	# _____	Incarcerated (i.e., prisoners)
# _____	Adolescents aged 13 - 17 years of age	# _____	Diagnosed with mental illness, cognitive impairment, or learning/language difficulty
# _____	Emancipated minors (minors living independently)	# _____	Other special populations (please specify below)
# <u>8</u>	Adults (persons 18 years of age or older)	_____	_____

Research site(s): State where project will take place NH

Time commitment for each subject/participant 3 hours

Compensation: Indicate the amount and form of compensation, if any (e.g., cash, course credit, drawing, mileage, etc.)
N/A

Project Attributes (check all that apply):

<input type="checkbox"/> Use of recruitment materials (i.e., flyers, emails, letters, advertisements)	<input type="checkbox"/> Observation
<input type="checkbox"/> Questionnaires or surveys	<input type="checkbox"/> Administration of tests, inventories, self reports, measuring instruments, etc.
<input type="checkbox"/> In-person	<input type="checkbox"/> Phone
<input type="checkbox"/> Phone	<input type="checkbox"/> Mail
<input type="checkbox"/> Mail	<input type="checkbox"/> Email
<input type="checkbox"/> Email	<input type="checkbox"/> Web
<input checked="" type="checkbox"/> Interviews	<input checked="" type="checkbox"/> In-person
<input checked="" type="checkbox"/> In-person	<input checked="" type="checkbox"/> Phone
<input type="checkbox"/> Skype (or similar)	<input type="checkbox"/> Photography, or audio/video recording
<input type="checkbox"/> Focus groups	<input type="checkbox"/> Medical procedures
<input type="checkbox"/> Other (please explain): _____	<input type="checkbox"/> Use of existing/secondary data

Signatures:

The undersigned accept(s) responsibility for the study, including adherence to DHHS and FDA regulations, New Hampshire law, and UNH policies relative to the protection of the rights and welfare of subjects/patients participating in this study. In the case of student applications, the Faculty Advisor and the student share responsibility for adherence.

Theresa Cherouvis
Signature of Applicant

Faculty Undergraduate Student Graduate Student Staff

By signing this form, the Faculty Advisor attests that (s)he has read the attached protocol submitted for IRB review, and agrees to provide appropriate education and supervision of the advisee/applicant above or for the other individual, below.

Bruce Mallory
Faculty Advisor Signature (required for student projects) PRINT Faculty Advisor's Name

Education 2-2976 bruce.mallory@unh.edu
Faculty Advisor's Department, Phone Number, and Email Address

If an individual in addition to the applicant will conduct the study, provide the individual's name, position, and contact information, as well as the individual's experience with the proposed paradigm, as indicated in the Outline to be Followed for Research Protocols Submitted to the IRB, item 3-b.

Name _____ Position _____

Address, Phone Number, and Email Address _____

Return this completed form with the research protocol and all pertinent information to the UNH Research Integrity Services (RIS), Room 107, Service Building. Direct questions to Julie Simpson (603/862-2003 or Julie.simpson@unh.edu) or Theresa Cherouvis (603/862-3536 or Theresa.cherouvis@unh.edu), or visit the IRB webpage at <http://unh.edu/research/human-subjects>.

Aftermath of a New England For-Profit College Closure on Enrolled Non-Traditional Students

Jennifer Logsdon, Doctoral Candidate in Education

B. DESCRIPTION OF PROJECT

1. INTRODUCTION

The growth of for-profit-education in the United States has produced much speculation from both proponents and critics of this sector of higher education. However, there is little research on student outcomes resulting from enrollment in for-profit institutions. Researchers have tended to focus on institutions which are labeled under the general term “for-profit” rather than recognizing that there are many types of institutions underneath the for-profit umbrella. This generalization has contributed to a lack of understanding of this sector, and there remains a glaring lack of research on the students who attend varying types of for-profit institutions. The research of Oseguera and Malagon (2010), reports from the Education Trust (Lynch, Engle, and Cruz. 2010) and the U.S. Senate (2014) are critical of the purpose, student-recruitment process, and business practices of for-profit institutions, as well as the overall question of whether or not government funds should be used to support corporations. The literature supporting for-profit institutions states that they are providing a service to students who are not being served by traditional non-profit institutions (Miller, Smith, and Nichols, 2011). William Tierney (2011), has written about for-profit institutions, but states, as do the majority of researchers, that there is not enough data on student outcomes to accurately assess whether or not for-profit colleges are providing a resource that is beneficial to the students they serve.

Further, investigations into the for-profit higher education sector headed by Senator Tom Harkin, resulted in a report (U.S. Senate, 2012), which prompted tighter restrictions on federal funding to for-profit institutions. Tighter restrictions and loss of funding resulted in a number of for-profit school closures, leaving students enrolled in these institutions at the time of closure without a college or academic credential.

Student Perspectives: The Closure of a New England For-Profit College

In September of 2016, Daniel Webster College, a for-profit institution, closed down after the federal government would not release federally funded financial aid to the college. The closure was a result of Daniel Webster’s parent company, ITT Educational Services, Inc., plan to move into bankruptcy. When Daniel Webster closed, enrolled students needed to make alternate choices regarding their education. In my study, my research question focuses on how students perceived and experienced the closure of Daniel Webster College. My primary research question is:

- How did students of a for-profit institution of higher education perceive and experience the institutions closure?

My secondary questions are:

- How were students notified of the school closure?
- Were students offered support to transition to a new institution?

- Did students have any issues with their financial aid or transfer credits due to the school closure?
- What influenced the decision of the students to choose the institution they transitioned into to complete their degree?

2. SPECIFIC AIMS

The point of this study is to understand the impact of a for-profit school's closure on first-generation students who have not completed their program of study. Research objectives include:

- Understand how first generation students experience a school closures, and their perception of events that occurred after the closure.
- Examine how students made the decision on where they would continue their education after a school closure.
- Understand the perspective of students regarding a school closure, and the ways in which a closure impacts the student.

3. RESEARCH PROTOCOL

Setting

Data collection will take place primarily in Manchester or Nashua, New Hampshire, in meeting rooms on the campus of either University of New Hampshire or Southern New Hampshire University. Data will be collected through interviews with participants. I will recruit participants by contacting staff at UNH and SNHU, and ask that they distribute my contact information to students who transferred into their institutions from Daniel Webster College. I will interview at 7-10 participants.

Consent:

A consent form for adults indicating their willingness to participate in an interview will be collected before the first interview. I may obtain oral consent over the phone, after reviewing the consent form with participants. In cases in which I am interviewing a participant in person, I will collect the signed consent form before conducting the first interview.

Interviews

Participants will engage in three interviews lasting a minimum of 60 minutes to 90 minutes at a time, with a minimum of seven days between interviews. Interviews will be audio-recorded and transcribed. All participants will be over the age of 18, and will be asked to sign a consent form. If interviews are being conducted over the phone, I will review the consent form over the form and obtain oral consent from participants. Subjects will be given the option to allow their real first name to be published in the study or not, as they prefer. I will audio-record and transcribe interviews for accuracy. Participants will not be compensated. I will contact prospective participants via phone or email, and will conduct interviews in person or over the phone. Both data collection protocols and consent forms for interviews are included **sections F and G**.

Other Approaches

To ensure that I am capturing data from the perspective of the participant, I will practice reflexivity throughout the data collection process by sharing analysis of the data with a

participant in any circumstances in which I feel unsure about my interpretation of events. This will help ensure that I am not interpreting data through my own perspective or bias.

4. STUDY PERSONNEL

The lead researcher in this study is Jennifer Logsdon, doctoral candidate in the education department. She has defended her dissertation proposal with her committee and has advanced to candidacy. She will meet with her dissertation chair, Dr. Bruce Mallory, regularly to discuss her progress with the dissertation.

5. DATA

This qualitative study employs a phenomenological research approach (Seidman, 2013), a strategy used to understand the experiences of students from their own perspective. By using phenomenological methods, I will be collecting data directly from participants, data which will describe how students experienced and perceived the events which occurred when their school closed. Using semi-structured interview questions, I will be able to ask participants to describe their experiences within the areas of concern raised by previous research. This will allow me to collect rich, meaningful data, which will produce needed information on for-profit college students, and give more insight to previous research.

After data collection is complete, I will transcribe interviews into documents and import those documents into a secure, web-based application. I will be using Dedoose, an application to manage, code, and analyze data. I will follow Saldaña's (2013) suggestions for coding, first writing analytic memos for each interview, and then exploring which coding categories would be most appropriate for the study. I anticipate using a variety of coding methods, which identify participants' emotions, values, and descriptions of events due to the nature of the study. When coding is complete, I will compare the experiences and perceptions of participants to see if themes emerge within the coded data.

While risks to participants are minimal, individuals may want to remain anonymous and will be able to indicate their preference for anonymity on the consent forms. For individuals who choose not to remain anonymous, I will use pseudonyms. If identifying features for these participants occur that are not crucial to accurate interpretation, I will mask them. If identifying features are crucial to interpretation, I will share the description with participants and have them decide if they would like the identifying features eliminated from the study.

Interviews of participants will be audio recorded to assist with accuracy in transcription and subsequent data analysis. Audio files and transcriptions of participant interviews will be given an ID number and will be stored in a secure computer according to their ID number. Participant ID numbers that correspond with contact information will be stored in a separate password protected Excel file. This system is important in particular for participants who do not want their name revealed in the study. Audio recordings of participants who do not want to be identified by name will be destroyed after the study is concluded. Participants will be able to change their status from public to anonymous at any time prior to the final draft of the dissertation.

Since anonymity cannot be guaranteed, participants will be made aware of potential risks prior to their participation in the study through informed consent. Participants will be granted the right to

withdraw from the study at any time. Data will be used primarily in a doctoral dissertation, but may also be published in a book or peer reviewed articles or shared at conferences.

6. RISKS

The potential risks of participating in this study are minimal. Participants may not want to be associated with a failed institution of higher education, but ultimately are receiving their credential from a different institution. Participants will be able to choose the option of remaining anonymous for the study, and I will provide pseudonyms for those participants.

7. BENEFITS

Though individual participants will experience no monetary gain, participants may benefit from the study in the following ways:

1. Participants will be given an opportunity to reflect on their educational experience and what they have learned through this experience.
2. Participants will be given an opportunity to participate in a study that will bring an understanding to the student experience side of school closure.

F. Consent Form



University of New Hampshire

Consent for Adult Student Participation in Interview

Hello! I am a graduate student at the University of New Hampshire studying education. I am conducting a study about the student outcomes after graduating from a medical assistant program. The study is called **Aftermath of a New England For-Profit College Closure on Enrolled Non-Traditional Students**. I am inviting you to participate in this study. You must be at least 18 years of age to participate in this study.

Purpose of the Study

I want to know about the experiences of students who were enrolled in a college that closed down, including how the students learned about the closure, the resources that were offered to students to continue their degree program, and how they chose a new institution in which to enroll. **The purpose of this study is to understand how students experience a school closure, and the impacts of the closure from a student perspective.**

What You Would Do

If you are willing, I would like to interview you in person or over the phone on 3 separate occasions, for about 60-90 minutes to ask some questions about your background leading up to college, your experience during transitioning into a different college, and your perspective throughout this transition. You have been selected because it is important to hear about student outcomes directly from students. I plan to interview about 10 adults for this study from 2 different universities. The interviews will take place during the last week of July and first week of August, 2017 in Southern New Hampshire/Northern Massachusetts in a public place with a quiet spot such as a library, or over the phone if necessary.

If you participate in the interview, I will audio record it, with your permission, so that I can make sure I record your words accurately. I will store any audio recordings and personal information that could identify you on a password protected file on UNH Box, which only myself, my dissertation chair, and my research assistant have access to. If you would like, I can share the written transcript of your

interview with you, for your approval, before I use it in the study. The audio recordings will be destroyed after the study.

Risks to You

Participating in this study is expected to present minimal risk to you. In the study, the full names of the student will not be revealed. If you participate in the study, you get to decide if you want to reveal your real first name or not. If you choose not to reveal your name, I will provide a pseudonym for you when reporting your responses to interview questions.

However, there are some risks to your privacy that exist if you choose to participate in the study, regardless whether you share your name or not. I may want to publish this study or share information in presentations. If you speak about your experiences, others will read what you have to say. Even if I don't reveal your name, sometimes personal information that you share such as your job or background may identify you. If you choose not to reveal your name, I will make every effort to keep information related to the study anonymous, but I cannot guarantee anonymity.

There are rare instances when I might be required to share personally-identifiable information, for example, in response to a complaint about the research, officials at the University of New Hampshire, and or regulatory and oversight government agencies may access research data. My faculty advisor, Dr. Bruce Mallory, will have access to all interviews, as well. I want to let you know this so you feel comfortable talking with me.

Benefits

By participating in the study, you could help provide an understanding of how a college closing directly impacts students. It is important to understand the experiences and perceptions of students in educational research.

Next Steps

If you give permission for the interview to be used for research purposes, please sign the form below. Participation in the study is completely voluntary. You may refuse to answer any questions, or withdraw from the study at any time without any penalty or negative consequences. There is no compensation for participation in this study.

If you have any questions about the study, feel free to contact me, Jennifer Logsdon, at (603) 512-9573 or jkt@wildcats.unh.edu or my academic advisor Dr. Bruce Mallory, at (603) 862-2821 or bruce.mallory@unh.edu

If you have any questions about your rights as a research participant, feel free to contact Dr. Julie Simpson, who is the Director of UNH Research Integrity Services at (603) 862-2003 or Julie.simpson@unh.edu

Please sign below if you GIVE PERMISSION FOR your interview to be used for research purposes.

I (name) _____ AGREE to participate in this research study.

Signature: _____

Date: _____

Please check this box if you DO NOT want your real (first) name shared in the study.

G. Interview Protocol

Interview Protocol

1. Date:
2. Location:
3. Interviewee Name:
4. Verification of Consent:

Introduction:

Hello, my name is Jennifer Logsdon and I am a graduate student in Education at the University of New Hampshire. Thank you for agreeing to participate in this interview. I am interviewing you because I am very interested in the experiences of students who were enrolled in an institution of higher education that closed while students were still enrolled in their program. I want to understand how students experienced the school closure, and your input is very valuable to me. This will be a three-part interview, in which I will be collecting some background information about you, and asking about how and why you chose to go to college. Then I will ask about how you learned about the school closure, and how you felt about it. Finally, I would like to know about how the closure impacted you, and the way you feel about college. You will remain anonymous in the presentation of my data, and if you feel that anything you tell me will identify you, please let me know if you do not want me to present that information. I will be using the information that I receive from you to complete the dissertation for my doctorate degree.

Interview 1

Background Information

In this interview I would like to ask you some questions so that I can get to know a little bit about you.

1. What is your gender?
Female___
Male___
Other___
2. What is your age?
3. Do you have a racial or ethnic identity that you go by?
4. Did either one of your parents go to college in the United States?
Follow up questions: Did either one of your parents receive a bachelor's degree?
What college did one or both parents attend? What was/were the degree(s) in?
What are your parents' professions?
5. Did any of your older siblings/cousins go to college?
6. When did you decide to go to college?

Follow up questions: Did anyone encourage you to go to college? Who encouraged you? What did they say/do to encourage you?

7. Why did you choose to enroll in Daniel Webster College?
8. What did you choose to major in at college?
9. Why did you choose that major?

Interview 2

Transferring to a different university

1. What university do you attend currently?
2. Why did you make the decision to transfer to this university?
Follow up: Did you decide on a different major? Did cost of tuition matter to you? Did the faculty or student services at either school impact your decision?
3. Did anyone help you make the decision to transfer? (family, other students, school staff or faculty)
4. How easy was it to transfer to a new university?
Follow up: Was admissions staff helpful? How easy was it to transfer credits? Did you know how your classes transferred into your new institution (general education, major, elective credits)? Were there any issues with your financial aid, or transfer of your financial aid between institutions? What was the most difficult part about changing institutions?
5. How did your financial aid transfer to the new university? Did you have to do anything different?
6. What resources did you use to help you transfer to the new university? (friends, family, university staff, Department of Education)

Interview 3

Experience

1. How do you feel about your experience with DWC?
Classes, faculty, student services, financial aid
2. How do you feel about your new university?
Classes, faculty, student services, financial aid

3. How did you feel about college/higher education in general, based on your experience with DWC?
Has your experience at your new institution influenced how you feel about higher education?
4. Would you encourage others in your community to go to college? Why or why not?
5. Based on your experiences, what would you tell people who have never been to college about higher education? What advice would you give them?
6. Looking back on your experiences in higher education, is there anything you would have done differently?
7. Do you feel your experiences in higher education are preparing you for graduation and beyond? How has higher education impacted your life? What do you think is different about your life because you went to college? What are your plans after you graduate?

H. Other pertinent documentation (faculty advisor letter of support, letter from collaborating sites)

- Please see attached letter from dissertation chair Bruce Mallory.

April 7, 2017

Dear Julie,

Please accept this e-mail as my letter of endorsement and support for Jen Logsdon's application to the IRB for review and approval of her dissertation proposal. As Jen's dissertation chair, I have and will continue to have close involvement with the conceptualization, design, analysis, and interpretation of her research. Jen has developed a sound proposal to examine the experiences of non-traditional students enrolled in a for-profit post-secondary institution that was closed precipitously in the wake of financial exigencies. She is most concerned with their perceptions of the experience of being "left in the lurch" and the decision-making process that they then engaged in to determine how to continue their post-secondary education. The rapid rise of enrollments in for-profit institutions of higher education over the past decade, and the recent increase in frequency of closure of such institutions related to financial failure and/or buy-outs from new corporate owners has had a significant impact on hundreds of thousands of non-traditional students in the United States. Jen's research will illustrate the experiences of one set of such students and therefore will have important implications for higher education policy, accreditation, and regulation.

Jen's qualitative methodology, using phenomenological interview methods, will allow for a deep understanding of the perceptions and decision-making processes of students affected by the sudden closure of the institutions in which they were matriculated. Jen's design is appropriate to her research questions. Her conceptual framework is grounded in relevant literature, and her understanding of the dynamic federal policy context of this issue will allow her to direct her interpretations to policy makers and others concerned with equitable access to post-secondary education.

I am confident that Jen will conduct a rigorous study and produce a useful contribution to higher education theory and knowledge. I will be sure that she manages her data effectively and in keeping with IRB standards.

Please don't hesitate to contact me if you have any questions.

All the best,
Bruce

Bruce L. Mallory, Professor of Education
Co-Director, NH Listens
Carsey School of Public Policy
University of New Hampshire
Huddleston Hall
Durham, NH 03824
603.862.2971
Bruce.mallory@unh.edu

University of New Hampshire

Research Integrity Services, Service Building
51 College Road, Durham, NH 03824-3585
Fax: 603-862-3564

23-May-2017

Logsdon, Jennifer
Education, Morrill Hall
Durham, NH 03824

IRB #: 6703

Study: Aftermath of a New England For-Profit College Closure on Enrolled Non-traditional Students

Approval Date: 23-May-2017

The Institutional Review Board for the Protection of Human Subjects in Research (IRB) has reviewed and approved the protocol for your study as Exempt as described in Title 45, Code of Federal Regulations (CFR), Part 46, Subsection 101(b). Approval is granted to conduct your study as described in your protocol.

Researchers who conduct studies involving human subjects have responsibilities as outlined in the document, *Responsibilities of Directors of Research Studies Involving Human Subjects*. This document is available at <http://unh.edu/research/irb-application-resources>. Please read this document carefully before commencing your work involving human subjects.

Upon completion of your study, please complete the enclosed Exempt Study Final Report form and return it to this office along with a report of your findings.

If you have questions or concerns about your study or this approval, please feel free to contact me at 603-862-2003 or Julie.simpson@unh.edu. Please refer to the IRB # above in all correspondence related to this study. The IRB wishes you success with your research.

For the IRB,



Julie F. Simpson
Director

cc: File

Mallory, Bruce



UNIVERSITY of NEW HAMPSHIRE

Dear Jennifer Logsdon,

This letter certifies that you have completed the mandatory Responsible Conduct of Research (RCR) training.

As a doctoral student at the University of New Hampshire (UNH), you will have many opportunities to participate in research and pursue your passions. Your responsible and ethical conduct throughout your research endeavors remains a fundamental aspect of your graduate education here at UNH.

To fulfill its ethical obligations to both the UNH community and the state of New Hampshire, the Graduate School and Research Integrity Services office have jointly embarked on a program addressing the responsible and ethical conduct of research and scholarly activity. This RCR program is mandatory for all Ph.D. students at UNH.

Congratulations on fulfilling this important requirement. Your cooperation and compliance with the ethical guidelines you have learned throughout this program are both appreciated and expected. As a researcher here at UNH, it is your responsibility to maintain the high standards set forth by this program and conduct research and scholarly activity in ways that preserve the intellectual and ethical merit of our university.

Sincerely,

**Harry J. Richards
Dean of the Graduate School
University of New Hampshire**

**Cari Moorhead, Ph.D.
Associate Dean of the Graduate School
University of New Hampshire**

**Julie F. Simpson, Ph.D.
Director, Research Integrity Services
University of New Hampshire**

APPENDIX D



October 19, 2015

Kevin M. Modany
Chief Executive Officer
ITT Educational Services, Inc.
13000 North Meridian Street
Carmel, IN 46032-1404

Re: Additional Reporting Requirements
OPE-IDs: 00732900 – ITT Technical Institute
03071800 – ITT Technical Institute
00473100 – Daniel Webster College

Dear Mr. Modany:

As a result of its heightened review of ITT Educational Services, Inc. (ITT), the U.S. Department of Education (Department) is providing this letter to identify additional procedures that ITT will need to follow in order to continue its participation in Title IV, HEA programs under ITT's current heightened cash monitoring method of payment.

On August 19, 2014, the Department sent you a letter citing ITT for its failure to submit timely an acceptable annual compliance audit and/or audited financial statement submission for ITT's fiscal year ending December 31, 2013. ITT's failure to make this timely submission resulted in the Department imposing a requirement that ITT be provisionally certified for a cumulative period of at least five years, pursuant to 34 C.F.R. § 668.175(f), and that ITT post an irrevocable letter of credit (LOC) for a period of five years in the amount of 10% of the Title IV, HEA program funds received by ITT during its most recently completed fiscal year (approximately \$79.7 million). At that same time, the Department also required ITT to make disbursements to eligible students and parents under the Heightened Cash Monitoring method of payment, as described in 34 C.F.R. § 668.162(e)(1) (HCM1).

Subsequent events since August 2014 – including ITT's failure of the general standards of financial responsibility set forth in 34 C.F.R. Part 668, Subpart L (due to a failing financial composite ratio) and the announcement by the Securities and Exchange Commission of a civil action against ITT and two of its officers – led the Department to impose additional reporting requirements, in order to permit the Department to more closely monitor ITT's ongoing participation in Title IV, HEA programs.

In taking each of the steps noted above, the Department considered – as it has considered again with the issuance of this letter – that as a condition of participation in Title IV, HEA programs, ITT agreed to act as a fiduciary responsible for the administration of federal funds. *See* 34 C.F.R. § 668.14(b)(2). Moreover, in issuing this letter, the Department has again considered that its Cash Management regulations are expressly intended to promote sound cash management of Title IV,

Federal Student Aid
AN OFFICE OF THE U.S. DEPARTMENT OF EDUCATION
Multi-Regional & Foreign Schools Participation Division
Union Center Plaza, 830 First Street, NE, 7th Floor
Washington, DC 20202
StudentAid.gov

HEA program funds by an institution, to minimize the financing costs to the Federal Government of making Title IV, HEA program funds available to a student or an institution, and to minimize the costs that accrue to a student under a Title IV, HEA loan program. 34 C.F.R. § 668.161(a)(1).

RECONCILIATION OF TITLE IV, HEA PROGRAM FUNDS

When a school receives funds pursuant to a Title IV, HEA program, it holds those funds in trust for intended student beneficiaries. As a trustee of, and with a fiduciary responsibility to administer and account for, those funds, a participating institution must have procedures in place that ensure that Title IV funds are used as intended. As described in the Federal Student Aid handbook, a “key component” of compliance with the cash management regulations and the fiduciary standards is the process of reconciliation. Title IV reconciliation is the process by which a school reviews and compares Title IV aid recorded on the Department’s systems with the information in the school’s internal records. Through reconciliation, disbursement and cash discrepancies are identified and resolved in a timely manner to ensure the school meets all regulatory requirements. Schools must document their reconciliation efforts and retain this documentation for auditing purposes.

With respect to the Direct Loan program, institutions are required to reconcile, on a monthly basis, institutional records with Direct Loan funds received from the Department and Direct Loan disbursement records submitted to and accepted by the Department. *See* 34 C.F.R. § 685.300(b)(5). Institutions are also required to implement a quality assurance system to ensure they are complying with program requirements and meeting program objectives. *See* 34 C.F.R. § 685.300(b)(9). The quality assurance process should document that the school is completing monthly reconciliation and program year closeout.¹

With respect to the Pell Grant program, FSA has advised participating institutions that, at a minimum, an institution should reconcile FSA financial records at least monthly. *See* FSA Handbook 2015-16 at 4-92. FSA has also cautioned institutions that, “the more frequently [a] school performs reconciliation, the more likely you will be able to identify issues and resolve them before they become part of a systemic problem.” *Id.* FSA has further cautioned that “it is almost impossible to satisfy other program requirements without performing monthly reconciliation of your school’s Pell Grant Program participation.” *Id.* at 4-96. As further provided in the FSA Handbook:

If a school is meeting all disbursement/adjustment reporting, excess cash, and reconciliation requirements, final reconciliation should begin no later than the last award or payment period end date at the school for a given program and year. A school should be able to reconcile to a zero ending cash balance soon after its final disbursements and should not carry an ending cash balance (positive or negative) for an extended period.

¹ *See* Electronic Announcement dated November 21, 2014 (<http://ifap.ed.gov/eannouncements/112114DirectLoanProgramReconciliation.html>); Electronic Announcement dated November 13, 2013 (<http://ifap.ed.gov/eannouncements/111313DirectLoanQualityAssuranceRequirementReminder.html>)

revise the student's Title IV awards in accordance with the Department's published guidance. All other requirements of HCM1, 34 C.F.R. § 668.162(e)(1), shall remain in effect. Moreover, nothing stated in this condition shall change the requirement stated in 34 C.F.R. § 685.303(b)(5).

2. Student Disbursement Reporting

Effective immediately, the Department is modifying the requirements for ITT to submit a monthly enrollment roster. This requirement was established on May 20, 2015 and modified June 18, 2015. In particular, ITT must now include disbursement information when submitting the monthly roster in the format (and with the information requested) shown in the Excel file provided herewith. Additionally, ITT must submit a written certification attesting to the accuracy of that roster, and attesting to ITT's adherence to these requirements. The first roster submitted must include all disbursements and refunds made in the 30 days prior to the submission date of the roster. Each subsequent roster must include all disbursements and refunds made since the submission of the previous roster. Please see enclosed sample Disbursement Roster Spreadsheet.

The certification should be made by an individual with authority to bind ITT, and should state:

By submitting this information, I certify to the best of my knowledge and belief that the information contained herein is true, complete, and accurate. I further certify that ITT Educational Services, Inc. ("ITT") has verified the eligibility of each individual to receive a disbursement of the Title IV funds provided. I further certify that ITT did not disburse Title IV, HEA funds to or for the benefit of any student listed on this roster until ITT had verified that student's attendance in the payment period for which the disbursements was intended. I further certify that ITT is and will remain in compliance with the terms and conditions of the Program Participation Agreement under which these funds have been provided. I am aware that the provision of any false, fictitious, or fraudulent information, or the omission of any material fact, may subject me and/or ITT to criminal, civil, or administrative penalties for fraud, false statements, false claims, or other violations. (U.S. Code Title 18, Section 1001; Title 20, Section 1097; and Title 31, Sections 3729-3730 and 3801-3812).

3. Additional Reporting Requirements

Effective immediately, on the first business day of each month, ITT must provide documentation to substantiate its reconciliation of all Title IV funds drawn as of the last day of the month preceding the month before the submission date. (For example, on November 2, 2015 ITT must submit documentation to substantiate its reconciliation of Title IV funds as of the last day of September, 2015; on December 1, 2015, ITT must submit documentation to substantiate its reconciliation of Title IV funds as of the last day of October, 2015.) The reconciliation documentation must provide evidence that ITT has reconciled the program accounts as described in the Department's publications, including Electronic Announcements dated December 18, 2014

and January 23, 2015.² Please submit such documentation to Byron Scott, Case Manager, via email at Byron.Scott@ed.gov, accompanied by a statement, signed by an individual with authority to bind the company, stating that:

By submitting this information, I certify to the best of my knowledge and belief that the information contained herein is true, complete, and accurate. I further certify that ITT is and will remain in compliance with the terms and conditions of the Program Participation Agreement under which Title IV, HEA funds have been provided. I am aware that the provision of any false, fictitious, or fraudulent information, or the omission of any material fact, may subject me and/or ITT to criminal, civil, or administrative penalties for fraud, false statements, false claims, or other violations. (U.S. Code Title 18, Section 1001; Title 20, Section 1097; and Title 31, Sections 3729-3730 and 3801-3812).

4. Additional Reporting Requirement of Bank Conditions

ITT must submit to the Department a description of any conditions that have been established by any bank or other entity that are related to ITT's participation in the Title IV HEA programs. ITT must promptly supplement this report when any new conditions are established, or when any changes are made to the existing items that have already been reported. Please submit such documentation to Byron Scott, Case Manager, via email at Byron.Scott@ed.gov

5. Additional Reporting of Individuals with Institutional Authority

Within seven days of the date of this letter, ITT must submit to the Department a list of all individuals who have the authority to direct or otherwise control the payment of any "refund[s] of unearned institutional charges" to the Department, as that phrase is used in 20 U.S.C. § 1099c(e)(6)(B). Please submit such documentation to Byron Scott, Case Manager, via email at Byron.Scott@ed.gov

Protection of Personally Identifiable Information (PII):

Because responses to certain of the above conditions will contain PII, please note the following information. PII is any information about an individual that can be used to distinguish or trace an individual's identity (such as name, Social Security number, and date/place of birth). The disclosure of PII can result in substantial harm, embarrassment, and inconvenience to individuals and may lead to identity theft or other fraud. To protect PII, please see the enclosure Protection of Personally Identifiable Information (PII) for instructions regarding submission of documents containing PII.

² <http://ifap.ed.gov/eannouncements/121814TitleVAidDisbureRptExcessCashReconciliRequirements.html> and <http://www.ifap.ed.gov/eannouncements/012315FederalPellGrantProgramReconciliation.html>

2015-16 FSA Handbook at 4-101.

During the course of its heightened oversight of ITT, the Department has reached the following conclusions with respect to ITT's cash management:

1. Since at least the 2009-2010 award year, ITT failed to timely reconcile its Title IV, HEA program accounts;
2. Prior to August 27, 2015, ITT had no written policy or procedure in place to guide the reconciliation of Title IV funds; and
3. ITT has requested to reopen prior award years to correct additional reconciliation issues with a frequency substantially greater than that of comparable institutions.

In addition, in July, August, and September 2015, FSA staff worked with ITT to assist with the reconciliation of Title IV, HEA funds for award years 2009-2010 to present. During that time, ITT provided conflicting information regarding the status of the reconciliation of Pell Grant Award years 2010-11, 2011-12, and 2012-13 (the reconciliation of which should have been completed well before July 2015).

Taken together, these facts demonstrate a failure by ITT to meet its fiduciary obligations, to properly and timely reconcile Title IV program funds as per the regulations and Federal Student Aid guidance, and to meet the standards of administrative capability required of institution's participating in Title IV, HEA programs, *see, e.g.*, 34 C.F.R. §§ 668.16(a), (c)(1).

ADDITIONAL RESTRICTIONS

As a result of the facts set forth above, and as a condition of remaining on the HCM1 payment method, the Department is requiring ITT to take additional steps to identify unearned Title IV HEA funds under ITT's control, and provide additional documentation to the Department regarding Title IV, HEA funds administered and drawn by ITT on behalf of its students.

1. Cash Management / Disbursements

ITT will not be permitted to disburse Title IV funds to students or parents ten days prior to the first day of classes for a payment period, as provided for in 34 C.F.R. § 668.164(f)(1). Effective immediately, ITT may only disburse Title IV funds to a student or and parent once: (i) an academic term has begun; (ii) ITT has confirmed that the student has attended courses sufficient to justify the enrollment status which supports that student's Title IV eligibility; and (iii) ITT provides written confirmation to the Department, using the form and certification attached hereto as Exhibit A (hereinafter "Certification Form"), of the student's eligibility to receive Title IV funds. Certification Forms are to be submitted to the Department no more than once by main OPEID per seven-day period.

ITT must also retain all information on which it relies to substantiate the enrollment status of each student it believes to be eligible to receive Title IV funds. If ITT is unable to document that a student has commenced attendance in a term, it may not disburse funds to the student, and it must

If you have any questions, please contact Byron Scott, Case Manager, by phone at 312-730-1534 or by email at Byron.Scott@ed.gov.

Sincerely,

A handwritten signature in blue ink that reads "Michael Frola". The signature is written in a cursive style with a large initial "M".

Michael Frola
Director, Multi-Regional and Foreign School Participation Division

Enclosures:

Example Student Disbursement Roster Certification form (soft copy provided under separate email)
Disbursement Detail and Summary Tracking Spreadsheet
Protection of Personally Identifiable Information

APPENDIX E



Virginia M. Barry, Ph.D.
Commissioner of Education
Tel. 603-271-3144

Paul K. Leather
Deputy Commissioner
Tel. 603-271-3801

STATE OF NEW HAMPSHIRE
DEPARTMENT OF EDUCATION
Division of Higher Education – Higher Education Commission
101 Pleasant Street
Concord, N.H. 03301
FAX 603-271-1953

MINUTES OF THE EXECUTIVE COMMITTEE MEETING ON SEPTEMBER 13, 2016

A meeting of the Higher Education Commission's Executive Committee was held at the University System of New Hampshire, 5 Chenell Drive, Suite 301, Concord, New Hampshire at 3:30 p.m. on Tuesday, September 13, 2016. The following members were present:

Todd Leach, Chair
Michele Perkins, Vice Chair (via telephone)
Steve Appleby (via telephone)
Sr. Paula Marie Buley (via telephone)
John Curran (via telephone)
Scott Kalicki (via telephone)
David Mahoney

The following additional Commission members participated via telephone:

Donald Birx
Michael Diffily
Paul LeBlanc

Also, one member of the public, Richard Gustafson, was present at the meeting.

- 1) Chair Leach called the meeting to order and a roll call was taken
- 2) Mr. Curran moved, seconded by Mr. Mahoney, to approve the Teach Out and Program Articulation Plan (copy attached) between Southern New Hampshire University, Daniel Webster College and ITT Educational Services, Inc. Consideration of this motion was with the understanding that Daniel Webster College would relinquish its New England Association of Schools & Colleges (NEASC) accreditation effective August 31, 2017. The NEASC would continue Daniel Webster College's accreditation until then for the sole purpose of allowing current students who complete their degree requirements by August 31, 2017 to receive a Daniel Webster College degree. The Higher Education Commission approval to continue operations would be contingent upon the same stipulation through August 31, 2017. Discussion followed with the following changes/clarifications:

TDD Access: Relay NH 711
EQUAL OPPORTUNITY EMPLOYER- EQUAL EDUCATIONAL OPPORTUNITIES

- (a) The second paragraph of the Teach-Out and Program Articulation Agreement and Exhibit A would be removed as the U.S. Department of Education felt it only provided background information not material to the substance of the transition plan for students, faculty. This slightly revised version is the document under consideration by the Commission.
- (b) Item 1(K) on Page 2 addressed student transcripts. It was clarified that Southern New Hampshire University would organize and scan all transcripts from Daniel Webster College's inception in 1967, and forward both hard and electronic copies to the Higher Education Commission as the repository.
- (c) The Division of Higher Education agreed to post a statement on its website briefly explaining the transition plan and the opportunity for all Daniel Webster College students to pursue their academic careers at Southern New Hampshire University and possibly other NH colleges and universities if that was the desire of the student.

After discussion and review of the above points and questions focused on ensuring Daniel Webster College students will soon regain access to federal financial aid and be able to continue their current degree programs, the Executive Committee unanimously approved the following motion: MOVED, To approve the Teach Out and Program Articulation Plan between Southern New Hampshire University, Daniel Webster College and ITT Educational Services, Inc.

Several members of the Higher Education Commission expressed appreciation for the efforts of Daniel Webster College President Michael Diffily and Southern New Hampshire University President Paul LeBlanc for their extraordinary efforts to protect Daniel Webster College students and reach an agreement on a plan. The US Department of Education and the NEASC will be promptly notified of the Commission decision, hopefully triggering release of federal funds by the end of the week.

The meeting adjourned at 4:15 p.m.

APPENDIX F

FAQ

General Questions:

What is a teach-out?

A teach-out is a way to provide a continuation of academic programming in the face of potential closure of a university. In this case, SNHU will step in to provide the faculty, facilities, and student support necessary to deliver all DWC academic programs for the 2016-2017 academic year. At the end of the 2016-2017 academic year, students will either graduate, transfer to SNHU or transfer to another college or university.

Is Daniel Webster College Closing?

Yes. As of September 13, 2016, DWC ceased operations and ITT terminated all DWC employees on the 14th. Through an agreement negotiated with ITT and the assistance of the US Department of Education, DWC's academic programs, athletics, student clubs, etc. will continue under the management of SNHU. The experience of students this year will remain unchanged (we actually hope it will be better once we get through this immediate transition period).

Is Southern New Hampshire University buying Daniel Webster College?

No. SNHU is leading a teach-out of all DWC programs. "Teaching-out" does not mean shutting down the programs. It means seeing students through to the completion of their programs. To that end, all DWC programs, students, and employees have been transferred to SNHU. The campus property is still owned by DWC parent company, ITT. We do have an offer on the table to purchase the property and have had no response.

What does this all mean for DWC students, faculty and staff?

The goal of the teach-out is to provide minimal disruption to DWC students. All classes will continue on campus in their current schedules, and residential students will continue to reside on the Nashua campus for the remainder of the academic year, served by the same faculty and staff. Details are still being worked out for what happens next year. The academic programs will continue, as mentioned, but may very well move to SNHU's Manchester campus.

For this year, any DWC student with 90 credits or more (seniors, basically) will finish up and receive a DWC diploma. Those with fewer than 90 credits will receive an SNHU diploma. If a student wishes to transfer at the end of this semester or year, we will assist in that process. *All* students are now SNHU students at this point (even if seniors are receiving a DWC diploma) and we are responsible for every aspect of their experience going forward.

Because we have been asked to hire DWC employees almost overnight and don't have time to go through the full hiring and onboarding process, we will officially hire all existing Daniel Webster employees in a temporary employee status so they will have no break in salary or medical coverage. We can then get our HR team to campus and transition most, if not all, employees to permanent status in an orderly process.

Why is SNHU offering a teach-out?

In the spirit of being a good neighbor and supporting the higher education community in New Hampshire, SNHU is leading a teach-out so DWC students can complete their degrees and have a normal

year. SNHU firmly believes that a high-quality, affordable college degree is the key to success and we are committed to helping students achieve their college completion goals.

Will DWC students be moved to SNHU's campus in Manchester?

All DWC students and courses will remain in Nashua for the 2016-2017 academic year. Once we get past this transition phase, we can assess the campus situation. Our sense is that we are most likely to move operations to the Manchester campus of 3,000 students (we urge you to visit it). Should our offer for the DWC campus be accepted, we will think through all of the options. We will be very transparent about the process and keep everyone informed.

Academics:

Will my classes continue at Daniel Webster College?

Yes, all classes will continue in their current schedules at DWC for the 2016-2017 academic year. We assume that all programs will continue in subsequent years.

SNHU does not offer my program, can still continue my classes?

Yes. SNHU has agreed to continue all academic programs for the 2016-2017 academic year. Our intent is to continue those programs beyond the 2016-2017 academic year as SNHU programs.

Who will have my transcript in the future?

Transcripts for students currently enrolled at Daniel Webster College (not yet graduated) will be held by SNHU. If you are a graduate of DWC, your transcripts will be held by the New Hampshire Commission of Higher Education.

Will all of my credits transfer?

If you continue on with SNHU, your Daniel Webster credits will transfer.

If you decide to transfer to another university, we cannot guarantee transfer of credits. Acceptance of transfer credits is always the prerogative of the "receiving" institution.

If I want to transfer, how do I obtain my academic records?

SNHU has maintained all student records and if you would like to access your records for transfer, our teams can help.

If I am in an ABET accredited program, will that continue to be the case?

ABET has never had a transfer of programs like this before but they are working with us and have suggested the following process: We will file to have the DWC ABET accreditation extended through the summer of 2017. That will ensure that accreditation continues for Seniors. At the same time, we will apply for SNHU to receive ABET accreditation. The time frame ABET outlined will allow us to complete their review process and have approval in time for May 2018 graduates. There is no automatic guarantee that we will receive ABET accreditation for SNHU, but we do not anticipate any problems since we are bringing forward the *same* program they recently affirmed, are retaining the *same* faculty, offering the *same* curriculum, and will provide significantly *improved* facilities and support for faculty development (two issues raised in the recent ABET review). On October 14th we will convene the faculty and appropriate staff to begin work on a state of the art, dedicated Engineering building. We hope that building can be complete for September 2018.

We are pursuing all other related certifications for other programs.

Where will graduation be held?

We are letting the Seniors decide if they would prefer to hold graduation on the DWC campus or as part of the SNHU events at the SNHU Arena in Manchester (formerly the Verizon Arena). Students with 90 credits or more cannot choose to have an SNHU diploma (that's an accreditor rule), while students with fewer than 90 credits will have an SNHU diploma (assuming they complete their programs with us) since there will be no DWC after this year.

Financial Aid:**What happens to my financial aid and institutional aid?**

During the first academic year (beginning Fall 2016) SNHU commits to matching all institutional aid that was being offered by Daniel Webster (a prior Financial Aid Award Letter and submission of the 16-17 FAFSA is required) as well as all forms of federal financial aid. Students receiving financial aid will need to add SNHU's school code to their FAFSAs. SNHU's school code is 002580. Financial Services is available to serve any students needing assistance.

We ask for your patience as we set up accounts, but we are committed to getting students their regular financial aid refund by September 21.

What do I need to do to get my financial aid?

Students receiving financial aid will need to add SNHU's school code to their FAFSAs. SNHU's school code is 002580 and this is the one thing you must do ASAP to receive aid. Financial Services is available to serve any students needing assistance and we will have a team on the DWC campus to sit down with any interested parent and/or student.

Will I have to pay SNHU tuition and fees?

SNHU will honor the current rate of tuition and fees for all Daniel Webster College students for the remaining academic year. DWC students will have access to their 2016-2017 federal financial aid and all institutional aid. If you continue on with SNHU beyond the 2016-2017 academic year, you will be charged SNHU tuition and fees, but we will have teams in place to help you apply for aid and find a package that works for you. If you look at the SNHU web site, we look a lot more expensive than DWC. However, in reality, we offer substantially more scholarship aid than does DWC and our actual average net price is very close to DWC's tuition cost. Remember that everyone's situation is different and the best thing to do is to sit down with an SNHU staff person and review your individual case. We can give you clear information upon which to base your decisions and you can easily compare your expenses.

I am on a payment plan with Daniel Webster College, will SNHU honor that payment plan?

Yes, SNHU will honor all tuition, fees, payment plans, scholarships and institutional aid for the 2016-2017 school year.

Will my FIRST scholarship transfer to SNHU?

Yes, we will honor all student scholarships for the 2016-2017 academic year. Our intent is to keep all students financially whole with no new or unexpected charges.

I've heard about "Borrower Defense Discharge" and "Closed School Discharge", can you explain these options?

The most applicable option in the case of Daniel Webster College would be closed school discharge. You can get detailed descriptions of both programs here.

(<https://studentaid.ed.gov/sa/repay-loans/forgiveness-cancellation#approved>)

Briefly, with "Closed School Discharge," if your school has closed prior to you completing your degree program you can apply to have the loans you've taken at *Daniel Webster College* forgiven. For example, if you were previously enrolled at a community college and you transferred to DWC, loans taken at that community college would *not* be included in the forgiveness.

Important caveats to consider, if you apply for "Closed School Discharge" and it is granted (the US Department of Education rules on a case by case basis):

- You would lose the credits you earned for the loan period forgiven.
- Those credits would not transfer to any other college or university.
- If you complete your degree program this option is no longer available to you, though there may be some exceptions to this rule -- for more details on possible exceptions [click here](#).
- If you take courses with SNHU and do not complete your degree program, you can seek "Closed School Discharge" for courses taken during DWC semesters; not for credits earned while enrolled at SNHU.

"Borrower Defense Discharge" is an option available to students who can prove their institution made fraudulent claims to them. After consultation with experts in this area, we believe borrow defense is generally not applicable in this situation because the teach-out arrangement allows you to continue your education in your program. However, borrower defense is defined by state law and for more information click here (<http://education.nh.gov/highered/>)

Student Life and Athletics:

What happens to DWC athletics?

All fall athletics will continue on their current schedules. SNHU is in conversations with the NCAA and the Conference to determine next steps for DWC winter and spring athletics teams. Our goal is to continue all athletic programs for the 2016-2017 academic year, but approvals of these arrangements are required from the NCAA.

What happens to DWC clubs and student events?

All DWC clubs and student events will continue as planned this year.

What will happen to DWC facilities?

SNHU did not buy the facilities or the campus, we have a licensing agreement to use the facilities for the 2016-2017 school year. Since we do not control the campus, the disposition of the property will be in ITT's hands. SNHU will continue with general maintenance of the buildings and facilities for the duration of the licensing agreement. We are optimistic that we will be able to finish the whole year on the Nashua campus (even if ITT sells the property to others, such sales take a long time and even longer if/when ITT is in bankruptcy proceedings, which we expect them to enter any time now). In the unlikely event that we would have to move, we are working on a Plan B. We have already identified excellent

APPENDIX G

National Center for Education Statistics

IPEDS Data Center

Daniel Webster College

UnitID 182661
OPEID 00473100
Address 20 University Dr, Nashua, NH, 03063-1300
Web Address www.dwc.edu

Institution Characteristics

General information: Academic year 2016-17

UnitID	182661
Name	Daniel Webster College
City	Nashua
State	NH
Web Address	www.dwc.edu
OPEID	00473100
Title IV Institution	Not currently participating in Title IV, has an OPE ID number
Control	Private for-profit
Level	Four or more years
Institution Category	Degree-granting, primarily baccalaureate or above
Carnegie Classification	Master's Colleges & Universities: Small Programs
Award levels	Associate's degree Bachelor's degree Master's degree
Religious Affiliation	Not applicable
Calendar System	Semester
Reporting Method	Student charges for full academic year and fall GR/SFA/retention rate cohort
Campus Setting	City: Small
Distance Learning	Offers undergraduate courses and/or programs

Student Charges

Cost of attendance for full-time, first-time, degree/certificate-seeking undergraduates: Academic year 2016-17

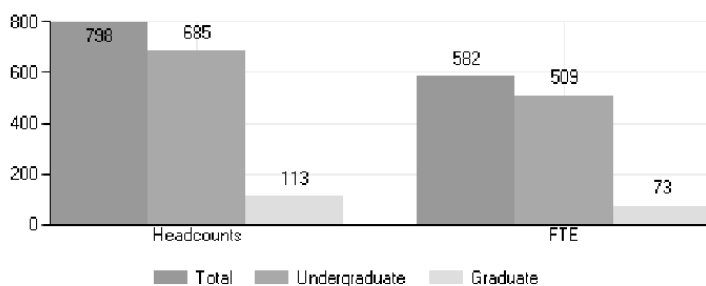
Published tuition and required fees	\$16,410
Books and supplies	\$1,800
On-campus room and board	\$11,922
On-campus other expenses	\$2,500
Off-campus (not with family) room and board	\$10,250
Off-campus (not with family) other expenses	\$2,500
Off-campus (with family) other expenses	\$5,500
Total Cost	
On-campus	\$32,632
Off-campus (not with family)	\$30,960
Off-campus (with family)	\$23,710

Typical tuition and required fees for full-time students: Academic year 2016-17

Level of student	Tuition and required fees
Undergraduate	\$16,410
Graduate	\$23,545

Enrollment

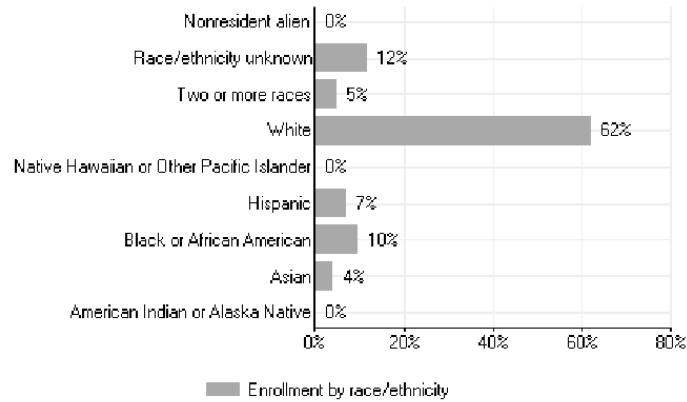
Unduplicated 12-month headcount and total FTE, by student level: 2015-16



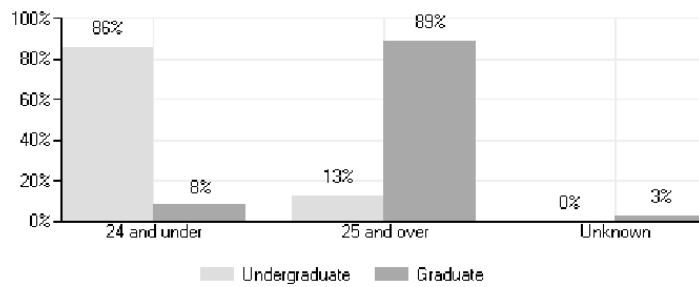
Enrollment by gender, student level, and full- and part-time status: Fall 2015

	Total	Men	Women
All students	741	571	170
Undergraduate	678	546	132
Degree/certificate seeking	675	543	132
First-time	150	120	30
Transfer-ins	87	65	22
Continuing	438	358	80
Nondegree/certificate seeking	3	3	0
Graduate	63	25	38
Full-time students	667	530	137
Undergraduate	604	505	99
Degree/certificate seeking	604	505	99
First-time	147	119	28
Transfer-ins	63	55	8
Continuing	394	331	63
Graduate	63	25	38
Part-time students	74	41	33
Undergraduate	74	41	33
Degree/certificate seeking	71	38	33
First-time	3	1	2
Transfer-ins	24	10	14
Continuing	44	27	17
Nondegree/certificate seeking	3	3	0

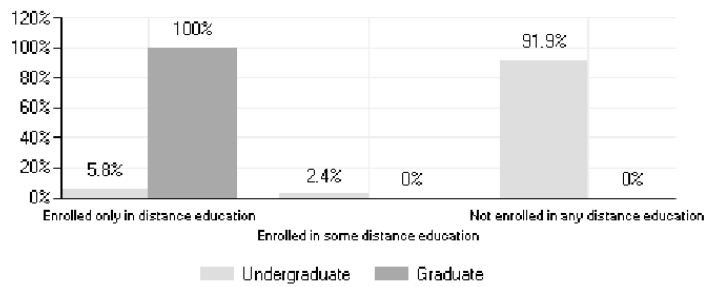
Percent of all students enrolled, by race/ ethnicity: Fall 2015



Percent of all students enrolled, by age: Fall 2015

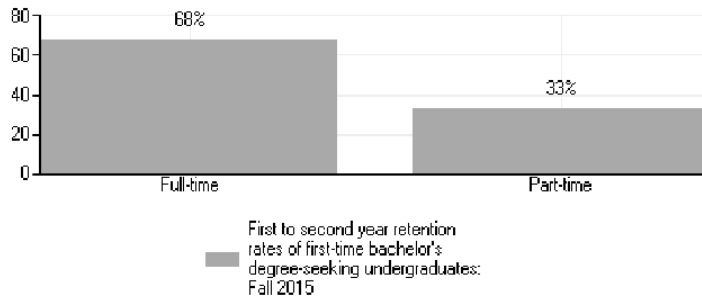


Enrollment by distance education: Fall 2015



Retention and Graduation

First to second year retention rates of first-time bachelor's degree-seeking undergraduates: Fall 2015



Completions

Number of degrees and certificates awarded, by level and race/ ethnicity and gender: July 1, 2015 - June 30, 2016

Total									
Race/ ethnicity and Gender	Certificates Below Bachelor's	Certificates Above Bachelor's	Associate's	Bachelor's	Master's	Doctor's research/ scholarship	Doctor's professional practice	Doctor's other	
Grand total	0	0	3	102	30	0	0	0	
American Indian or Alaska Native	0	0	0	1	0	0	0	0	
Asian	0	0	0	2	1	0	0	0	
Black or African American	0	0	3	11	2	0	0	0	
Hispanic or Latino	0	0	0	3	4	0	0	0	
Native Hawaiian or Other Pacific Islander	0	0	0	0	0	0	0	0	
White	0	0	0	79	17	0	0	0	
Two or more races	0	0	0	3	0	0	0	0	
Race/ ethnicity unknown	0	0	0	3	6	0	0	0	
Nonresident alien	0	0	0	0	0	0	0	0	
Men									
Race/ ethnicity and Gender	Certificates Below Bachelor's	Certificates Above Bachelor's	Associate's	Bachelor's	Master's	Doctor's research/ scholarship	Doctor's professional practice	Doctor's other	
Grand total	0	0	2	83	15	0	0	0	
American Indian or Alaska Native	0	0	0	1	0	0	0	0	
Asian	0	0	0	1	1	0	0	0	
Black or African American	0	0	2	9	1	0	0	0	
Hispanic or Latino	0	0	0	2	1	0	0	0	
Native Hawaiian or Other Pacific Islander	0	0	0	0	0	0	0	0	
White	0	0	0	64	10	0	0	0	
Two or more races	0	0	0	3	0	0	0	0	
Race/ ethnicity unknown	0	0	0	3	2	0	0	0	
Nonresident alien	0	0	0	0	0	0	0	0	
Women									
Race/ ethnicity and Gender	Certificates Below Bachelor's	Certificates Above Bachelor's	Associate's	Bachelor's	Master's	Doctor's research/ scholarship	Doctor's professional practice	Doctor's other	
Grand total	0	0	1	19	15	0	0	0	
American Indian or Alaska Native	0	0	0	0	0	0	0	0	
Asian	0	0	0	1	0	0	0	0	
Black or African American	0	0	1	2	1	0	0	0	
Hispanic or Latino	0	0	0	1	3	0	0	0	
Native Hawaiian or Other Pacific Islander	0	0	0	0	0	0	0	0	
White	0	0	0	15	7	0	0	0	
Two or more races	0	0	0	0	0	0	0	0	
Race/ ethnicity unknown	0	0	0	0	4	0	0	0	

Nonresident alien	0	0	0	0	0	0	0	0
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Number of degrees and certificates awarded, by level and program: July 1, 2015 - June 30, 2016

Program	Certificates Below Bachelor's	Certificates Above Bachelor's	Associate's	Bachelor's	Master's	Doctor's research/scholarship	Doctor's professional practice	Doctor's other
Grand total	-	-	3	102	30	-	-	-
Computer and Information Sciences and Support Services	-	-	-	11	-	-	-	-
Engineering	-	-	-	7	-	-	-	-
Parks, Recreation, Leisure and Fitness Studies	-	-	-	7	-	-	-	-
Psychology	-	-	-	8	-	-	-	-
Homeland Security, Law Enforcement, Firefighting, and Related Protective Service	-	-	-	8	-	-	-	-
Transportation and Materials Moving	-	-	-	34	-	-	-	-
Visual and Performing Arts	-	-	-	12	-	-	-	-
Business, Management, Marketing, and Related Support Services	-	-	3	15	30	-	-	-

Human Resources

Number of full- and part-time staff and graduate assistants, by primary occupational category: Fall 2015

Occupational category	Total	Full-time	Part-time
All staff	247	91	156
Instructional Staff	158	20	138
Research	0	0	0
Public Service	0	0	0
Librarians, Curators, and Archivists	3	3	0
Archivists, Curators, and Museum Technicians	0	0	0
Librarians	3	3	0
Library Technicians	0	0	0
Student and Academic Affairs and Other Education Services	0	0	0
Management	23	23	0
Business and Financial Operations	1	1	0
Computer, Engineering, and Science	1	1	0
Community Service, Legal, Arts, and Media	27	13	14
Healthcare Practitioners and Technical	0	0	0
Service Occupations	7	4	3
Sales and Related Occupations	0	0	0
Office and Administrative Support	25	24	1
Natural Resources, Construction, and Maintenance	2	2	0
Production, Transportation, and Material Moving	0	0	0
Graduate Assistants	-	-	0
Graduate Assistants Teaching	-	-	0
Graduate Assistants Research	-	-	0
Graduate Assistants Management Occupations	-	-	0
Graduate Assistants Business and Financial Operations Occupations	-	-	0
Graduate Assistants Computer, Engineering, and Science Occupations	-	-	0
Graduate Assistants Community Service, Legal, Arts, and Media	-	-	0
Graduate Assistants Library and Instructional Support	-	-	0
Graduate Assistants Healthcare Practitioners and Technical	-	-	0

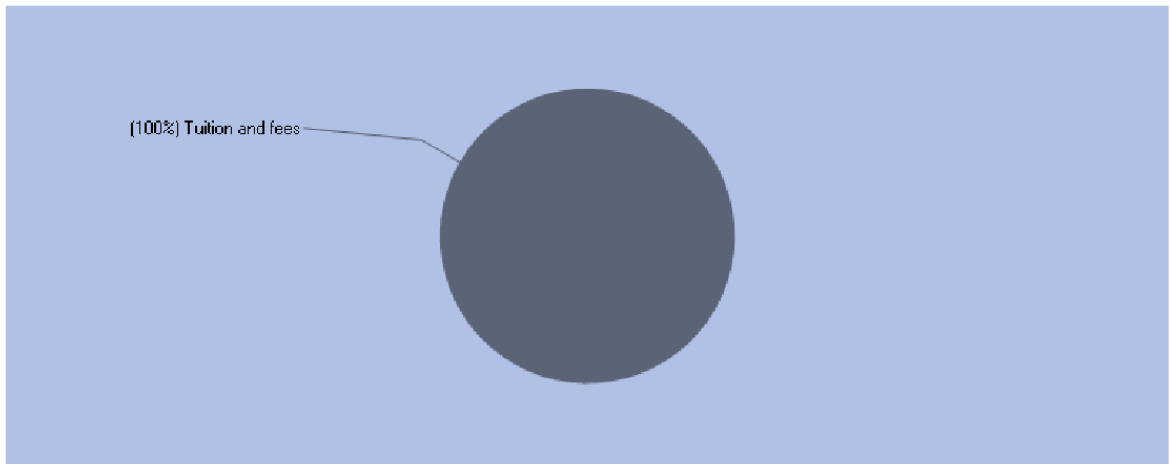
Number of full-time instructional, research, and public service staff, by tenure status: Fall 2015

	Total	Instructional Staff	Research	Public Service
Total	20	20	0	0

With faculty status	20	20	0	0
Tenured	0	0	0	0
On tenure track	0	0	0	0
Not on tenure track	20	20	0	0
Multi-year contract	20	20	0	0
Annual contract	0	0	0	0
Less-than annual contract	0	0	0	0
Without faculty status	0	0	0	0

Finance

Percent distribution of core revenues, by source: Fiscal year 2015



Core revenues per FTE enrollment, by source: Fiscal year 2015

Tuition and fees	\$15,220
Government appropriations grants and contracts	\$0
Private gifts, grants, and contracts	\$0
Investment return	\$0
Sales and services of educational activities	\$0
Other core revenues	\$0

Core expenses per FTE enrollment, by function: Fiscal year 2015

Instruction	\$3,046
Research	\$0
Public service	\$0
Academic support	\$959
Institutional support	\$3,358
Student services	\$11,759
Other core expenses	\$0