

January 18, 2016

Gail McLarnon
Office of Postsecondary Education
Senior Director
Policy Development, Analysis, and Accreditation Service
U.S. Department of Education
1990 K Street, Floor 8
Washington, DC 20006

Dear Ms. McLarnon:

During the Borrower Defenses Negotiated Rulemaking Committee session last week, we understand that several references may have been made about ITT Technical Institute. I initially planned to attend the session last week but could not make it to Washington. I do plan on attending the February and March sessions. In the meantime, I am writing to set the record straight.

One negotiator may have said, in part, that ITT Tech misrepresented its accreditation status to students. ITT Tech is accredited at the institutional level by the Accrediting Council for Independent Colleges and Schools (ACICS). That is what students are told. ITT Tech's health information technology program is also accredited by the Commission on Accreditation for Health Informatics and Information Management Education. Perhaps the negotiator was unfamiliar with the differences between national, regional, and programmatic accreditation or is unaware that ACICS is an accrediting agency recognized by the U.S. Department of Education. Any statement about ITT Tech misrepresenting its accreditation status is based on disputed allegations, not a finding of fact.

While no former ITT Tech students were at the negotiating table, some negotiators may have claimed that private sector school students, including those from ITT Tech, were misled about potential job prospects, were unsatisfied with the quality of their education or taught themselves course material without any aid from an instructor. These disputed allegations are second hand, unsubstantiated, and uncorroborated hearsay by a negotiator who lacks firsthand, personal knowledge of the facts. Unsubstantiated student stories and allegations taint the negotiated rulemaking process and should never become the basis for defenses to repayment.

We are proud of the steps we take to ensure that prospective students receive accurate information about ITT Tech. For example, the only salary and career statistic information that ITT Tech disseminates is found in a graduate employment information disclosure. Every prospective student signs this disclosure, which states the number of graduates during the prior calendar year in the program of study at the ITT Tech campus that the student wishes to attend; the number and percentage of such graduates who obtained employment using the skills taught in

the program; and the average, high, and low starting annual salaries of these employed graduates. This is just one of the many steps we take to guard against misrepresentation.

To help ensure we are providing our students with a high-quality, career-based postsecondary education, we enlist the help of national, regional and local employers. Last year, more than 2,500 employers provided feedback on our courses.

We hope that the Department will develop proposed Borrower Defense regulations based on actual facts – not unsubstantiated student stories or allegations. I appreciate you sharing this letter with the negotiators.

Thank you.

Sincerely,



Nicole Elam
Vice President, Government Affairs