

DISTRICT OF COLUMBIA
HIGHER EDUCATION LICENSURE COMMISSION

Public Session No. 23-08
August 3, 2023 (virtual)
9:30a.m.

I. Call to Order

Commissioner Harriet Segar called the meeting to order at 9:44 a.m.

Commissioners Present:

Commissioner Harriet Segar, Esq., Chair
Commissioner Elaine Crider, D.H.Sc., Vice Chair
Commissioner Estell Mathis-Lloyd, M. Ed., Secretary
Commissioner Rachel Petty, Ph.D.

Staff Present:

Angela Lee, Executive Director
Terasita Edwards, Deputy Director
Alesia Henry, Education Compliance Specialist
Dorothy Thomas, Education Compliance Specialist
Emily Lawson, Education Compliance Specialist
Nagesh Tammara, Attorney Advisor
Maia Turner, Administrative Assistant

Guests Present:

Four Walls Career & Technical Education Center
Tish Nichols
Nedra Jones

Adult Career Technical Academy
Deborah Hayman

New Lines Institute for Strategy and Policy
Jessica Peyton
Kareem Makhoulf
H. Ismeail

Southeast Welding Academy

Jamise Chavis
Marsha Woodland

International Teachers University (ITU)
Kevin J. Ruth
Rishab Khanna

St. Michael's College of Allied Health
Michael Adedokun

Johns Hopkins University (JHU)
Rayna Jordan
Lainie Rutkow
Schuyler Asman

Moreland University
Carol Sanginario
Dr. Susanne H. Thompson
Karena Zulkowski

Bethel Training Institute
Carol Grant-Gordon

Ohio University
Hebah Abdalla Lehmann

Drexel University
Jim Wilson
Deanna Hill

James Madison University (JMU)
Sarah Cheverton
David Jones

Texas A&M University - The Bush School of Government
Gregory Gause
Jay Silveria
Jodi Carr

Parami University
Kyaw Moe Tun
Myat Su
Alexis Rieffel

George Washington University (GWU)
Barrett Matthews

MedCerts, LLC
Richard Pompa

Claremont McKenna College (CMC)
Maija Harkonen

Nexford University
Nicole Ayala

Cornell University
Patrick Feely

The Ohio State University
Kate Stottlemeyer
Erin McLaughlin
Carson Fort

Baylor University
Beth Butler

Strayer University
Dr. Joe Ann Pace
Lisa Sincere
Dr. Carlo Sapijaszko
Trevor Belcher

Strayer University
Lisa Sincere
Kimberly Frazer

Adtalem Global Education
Hajo Oltmanns
Maureen Resac
Andrea Larocco
Corinne Yamamoto

Ponitical John Paul II Institute for Studies on Marriage and
Family
Nick Bagileo

Career Technical Institute

Dr. Sharon Conn

Hands on Dental Assistant Training
Jess Deinlein

Hamilton College
Madeline Carrera, PHD

University of Kentucky (UKY)
Caitlin Dibiasie

The Vets Group
Joe Wynn

University of Pittsburgh
Megan Varn

Walden University
Melissa Bocan
Matt Smith
Sue Sibocz

Technical Learning Center DBA Prospect College
Mark Toufanian

Westlink Career Institute
Gerald Banks
Vanessa Stanton

Other Attendees:

Dr. Jocelyn Harris-Herbert, HELC Contractor
Eric Amofa, Former student of Allied Health Institute
Schuyler Asman
Kimberly Brown
Iria Campbell
Bjay Battulga
Amanda Sanchoo
Donna Williamson
Kamran Bokhari
Leah Meizoso
Yvonne Hollis
Tyler D.
Nelson

Edward

II. Ascertainment of Quorum

Four (4) Commission members were present constituting a quorum.

III. Approval of the Agenda

The Commission voted to approve the August 3, 2023 agenda.

IV. Public Comment (reserved for agenda items only)

There were no comments from the public.

V. Consent Agenda

The Commission voted unanimously to approve the consent agenda.

Approval of the June 8, 2023 meeting minutes

The Commission voted unanimously to approve of the minutes from the June 8, 2023 public meeting.

One-year approval list

Recommended approval for the following applications for **one (1)** year from the date of expiration.

RENEWALS & AMENDMENTS *submitted at time of renewal*

Institutions	Approval Type	Expiration Date if Approved
MedCerts, LLC. (ND)	Renewal	6/30/2024
Texas A&M University, The Bush School of Government and Public Service (D)	Renewal and Amendment	7/31/2024
Parami University (D)	Renewal	6/30/2024
Cornell University (D)	Renewal	7/31/2024
National Conservatory of Dramatic Arts (ND)	Renewal	7/31/2024
Drexel University (D)	Renewal	7/31/2024
The Vets Group (ND)	Renewal	7/31/2024
James Madison University (D)	Renewal	7/31/2024

AMENDMENTS ONLY

HELC Minutes
Public Session No.: 23-08
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* The licensure period for institutions seeking approval to amend by adding new programs, new location or name change will synchronize with the institutions current license.

Institutions	Approval Type	Current Expiration
Florida International University (D)	New Program	1/31/2024

CONDITIONAL EXEMPTIONS

Recommended approval for the following applications for **one (1)** year from the date of expiration.

Institutions	Approval Type	Expiration Date if Approved
Hamilton College (D)	Renewal	1/31/2024
Ohio University (D)	Renewal/New Location (student housing only)	8/31/2024
Baylor University (D)	Renewal	7/31/2024
Claremont McKenna College (D)	Renewal	6/30/2024
University of Pittsburgh (D)	Renewal	7/31/2024
University of Kentucky (D)	Renewal	9/30/2024
The Ohio State University (D)	Renewal and new location	7/31/2024

STATE AUTHORIZATION RECIPROCITY AGREEMENT (SARA)

Recommended approval for the following applications for **one (1)** year from the date of expiration.

Institutions	Approval Type	Expiration Date if Approved
Career Technical Institute (D)	Renewal	9/11/2024
George Washington University (D)	Renewal	9/11/2024
Georgetown University (D)	Renewal	9/14/2024
Gallaudet University (D)	Renewal	9/10/2024

CONDITIONAL APPROVALS

Recommended approval with conditions for the following applications for **one (1)** year from the date of expiration. If approved, conditions must be satisfied within 30 days of approval, unless otherwise specified.

Institution	Approval Type	Conditions of Approval	Expiration Date if Conditions are met timely
Hands on Dental Assistant Training (ND)	Renewal	Submit proof of emergency kit	7/31/2024
Howard University (D)	SARA Renewal	Update Emergency	8/17/2024

KEY: *Institution Type:* (D) – Degree (ND) – Non-Degree

C. SAA- Veterans Education approval list

COMPLIANCE & MONITORING REPORT

EXPIRATIONS

Notice of license expiration was sent to the following institutions.

Institutions	Expiration Date
Claremont Graduate University	5/31/2023
Davis Memorial Goodwill Industries	7/31/2023
Dickinson College	2/28/2023
Graduate School USA	3/31/2023
Thinkful, Inc	1/31/2023

NOTICE OF INTENT TO DENY

Notice of Intent to Deny was issued to the following institutions.

Institution	Case Number	Hearing Info
Allied Health & Technology Institute (ND)	D2022-003	Hearing concluded 7/13/23

UNLICENSED ACTIVITY

The Commission is/has investigated the following institutions suspected to be operating postsecondary educational programs in the District of Columbia without approval.

Institution	Improper Activity	Sanction/Fine to be levied
Adult Career Technical Academy	Institution entered into an MOU with Westlink Career Institute and continued to offer post-secondary education in the District without proper licensure	Fine \$500 not paid
University of Southern California	Institution opened an unapproved facility on March 17, 2023.	Fine \$500
Purdue University	Institution hosting two-week program in DC.	TBD

ANNUAL DATA SURVEY

The Annual Data Survey (ADS) Reporting period was from March 1- April 1, 2023. The institutions below submitted the ADS after the deadline or have not complied with the submission of the survey as of Friday, April 7, 2023.

Institution	Sanction/Fine to be levied	Status
Lake Forest Graduate School of Management (D)	\$500	No response to the violation letter
Marquette University/Les Aspin Center for Government (D)	\$500	No response to the violation letter
Thinkful, Inc. (ND)	\$500	No response to the violation letter

VI. Non-Consent Agenda (items removed from consent agenda)

There were no additional items removed from the consent agenda.

VII. Unfinished Business

a. Licensure Requests

Bethel Training Institute

RECAP from previous meeting(s):

At the June 8, 2023 public meeting, the Commission voted unanimously to defer action on the application for licensure renewal to offer non-degree certificate programs in: Home Health Aide (HHA) submitted by Bethel Training Institute until the August 3, 2023 public meeting.

The Commission voted unanimously to defer action on the application for licensure renewal submitted by the Bethel Training Institute until the October 5, 2023 public meeting and conclusion by the Board of Nursing.

Southeast Welding Academy

RECAP from previous meeting(s):

At the June 8, 2023 public meeting, the Commission voted unanimously to defer action on the application for licensure renewal to offer non-degree certificate programs in: Basic Shielded Metal Arc Welding, Advanced Shielded Metal Welding, Basic Pipe Welding, Advanced Pipe Welding and Oxy Fuel Cutting submitted by the Southeast Welding Academy until the August 3, 2023 public meeting.

The Commission voted unanimously to defer action on the application for licensure renewal submitted by the Southeast Welding Academy until the October 5, 2023 public meeting with the conditions to be met:

- Submit a Certificate of Clean Hands
- Submit four (4) months of operating capital

Four Walls Career & Technical Education Center

RECAP from previous meeting(s):

At the June 8, 2023 public meeting, the Commission voted (Approve: Crider, Lara, Petty; Negative: Lloyd, Segar) to defer action on the application for licensure renewal to offer non-degree certificate programs in: Adult Basic Education/General Education Diploma (ABE/GED), National External Diploma Program (NEDP), Digital Literacy, CORE Curriculum (Construction), Stationary Steam Engineering, Electrical Wiring, Rise Up Customer Service and Sales Credential Training and Heating Ventilation and Air Conditioning (HVAC) submitted by Four Walls Career & Technical Education Center until the August 3, 2023 public meeting.

The Commission voted unanimously to approve the application for licensure renewal submitted by Four Walls Career & Technical Education Center for one (1) year, not to exceed May 31, 2024.

Walden University

RECAP from previous meeting(s):

At the June 8, 2023 public meeting, the Commission voted unanimously to defer action on the applications requesting agent licensure renewal for their fifty-one (51) agents listed in the staff report submitted by Walden University until the August 3, 2023 public meeting.

Subsequently, the institution has reduced their applications from fifty-one (51) agent licensure requests to twelve (12) agent licensure applications for approval.

The Commission voted unanimously to approve the applications for a total of twelve (12) agent licensure renewals submitted by Walden University synchronous with the current licensure approval.

b. Closure

Technical Learning Center DBA Prospect College

RECAP from previous meeting(s):

At the June 8, 2023 public meeting, Dr. Toufanian asked the Commission to defer action on the request for closure while he awaited the final decision from the United States Department of Education on a request for reconsideration of participation.

The Title IV program response concluded in disallowing the institution to continue participation with accreditation. Subsequently, a request to withdraw accreditation was provided by the institution, and to move forward with an affirmative approval of the request for campus closure of the Technical Learning Center DBA Prospect College.

The Commission voted unanimously to approve the application for campus closure submitted by Technical Learning Center DBA Prospect College with the following conditions to be met no later than September 4, 2023:

- Submit all outstanding documents from the Department of Education pertaining to the final decision

VIII. Applications for Licensure/Exemption/Amendment

a. Provisional/Initial

i. New Lines Institute for Strategy and Policy

New Lines Institute for Strategy and Policy submitted an application for Provisional licensure renewal to offer the degree program in Master of Arts in Strategy and Policy.

The Commission voted unanimously to approve the application for Provisional licensure submitted by New Lines Institute for Strategy and Policy for one (1) year, not to exceed June 30, 2024.

ii. International Teachers University

International Teachers University submitted an application for Provisional licensure to offer the degree program in: Master's in Education.

The Commission voted unanimously to approve the application for Provisional licensure submitted by the International Teachers University for one (1) year, not to exceed June 30, 2024.

b. Renewals/Amendment Applications

i. Johns Hopkins University

Johns Hopkins University submitted an amendment application for an additional location at address 555 Pennsylvania Avenue, NW Washington, DC 20001 to offer various degree programs.

The Commission voted (Affirmative: Lloyd, Petty, Segar; Abstentions: Crider) to approve with conditions the application requesting amendment for an additional location at address 555 Pennsylvania Avenue, NW Washington, DC 20001 submitted by Johns Hopkins University synchronous with the current licensure approval and with the following conditions to be met:

- A satisfactory site visit
- Submit a permanent Certificate of Occupancy

ii. Moreland University

Moreland University submitted an application requesting continued participation in SARA.

The Commission voted unanimously to conditionally approve the application requesting continued participation in SARA on a Provisional stature submitted by Walden University contingent upon the following conditions to be met:

- Submit a plan requesting the documents from Investment Holdings, LLC within 7 days
- Submit all final documents such as; an audit and composite scores no later than September 15, 2023

c. Cases and Show Cause

i. C2023-001 – Eric Amofa vs St. Michaels College of Allied Health

The Higher Education Licensure Commission received an emailed complaint dated October 19, 2022, from Mr. Eric Fosu Amofa that indicated that in February 2022 he filed a complaint with the Office of the Attorney General detailing several concerns he had about the school regarding financial aid, dropout rates, attendance policies, retaliation, intimidation and general unprofessionalism. Mr. Amofa’s email did not include documentation to substantiate his claims.

Mr. Amofa’s official complaint to the Higher Education Licensure Commission falls under 5 DCMR § A8117 Student Records. Specifically, 5A DCMR § 8117.2 which states “A school shall maintain as a permanent record and provide, upon request, a transcript to the student who has satisfied all financial obligations currently due and payable to the school.

In the case of, C2023-001 – Eric Amofa vs St. Michaels College of Allied Health said parties shall proceed via hearing on the matters that the HELC has jurisdiction. The former student Mr.

Amofa and the St. Michaels College of Allied Health will receive written correspondence regarding the scheduled dates and times for a hearing.

ii. Adult Career Technical Academy

The Adult Career Technical Academy sent communication to the District of Columbia City Council stating that they had been operating in the District of Columbia since calendar year 2017. The Commission does not have any confirmation of the institution to have ever applied for licensure or have been licensed to do so.

Subsequently, Adult Career Technical Academy has been asked to speak to the Commission about their unlicensed activity in the District of Columbia.

The Commission accepted the explanation to the claims that were communicated to the City Council that The Adult Career Technical Academy were allegedly operating in the District without licensure. Additional clarity was provided in the relationship of affiliation between Career Technical Academy (ACTA) and Westlink Career Institute. Ms. Deborah Hayman has asserted on the public record that the institution did not operate independently. Ms. Hayman is intending to seek licensure with the Commission to properly operate within the District.

iii. Westlink Career Institute

The Commission took the action to deny licensure renewal of Westlink Career Institute. Ms. Hayman, on behalf of Westlink Career Institute, requested a hearing on the denial.

The day before the hearing was scheduled to occur, Ms. Hayman, on behalf of Westlink Career Institute, withdrew the request for hearing.

HELC staff subsequently sent a letter to Westlink Career Institute requesting that the institution move forward with the appropriate closure process, which would include the surrender of academic records, proper notice to any students or business affiliates, and a final site visit to confirm that the facility where the program was operating, had in fact shut down.

The Commission voted unanimously to refer this issue of Westlink Career Institute and its outstanding document enclosure activities to the Office of the Attorney General for the District of Columbia.

IX. Extended Public Comment (limited to 2 minutes per person on any item/matter not listed on the agenda)

There were no comments from the public.

X. Report of the Executive Director

After Action Report

The following are updates to conditions of license approval and other requests made by the Commission that remain outstanding:

- i. **Lake Forest Graduate School of Management** – has not yet responded to the annual data survey (ADS) request for late filing or the violation letter.
- ii. **Marquette University/Les Aspen Center for Government** – has not yet responded to the annual data survey (ADS) request for late filing or the violation letter.
- iii. **Thinkful, Inc.** – has not yet responded to the annual data survey (ADS) request for late filing or the violation letter.

XII. Correspondence and Communications

A. Informational

- i. **US DOE FSA**
RE: Technical Learning Center DBA Prospect College

In a letter stamp dated June 28, 2023; providing update to the U.S. Department of Education advised Prospect College that it's application for recertification to participate as an eligible institution in the student financial assistance programs authorized pursuant to Title IV of the Higher Education Act of 1965, as amended, 20 U.S.C. § 1070 et seq. ("Title IV, HEA programs") had been denied. Prospect subsequently requested that this decision be reconsidered ("Reconsideration Request").

34 C.F.R. §§ 668.26(a)(1), 685.214 (a)(2). Since Prospect ceased offering instruction on May 31, 2023, its eligibility in the Title IV, HEA programs ended and a request for reconsideration of the recertification denial is moot. Consequently, the Department will take no further action on the request.

No action required by the Commission at this time.

- ii. **Strayer University**
RE: Notice of New Programs and Course Changes

In a letter dated July 20, 2023; providing notification of several new program offerings at Strayer University. Based on our ongoing assessment and program review activities, the University decided to add new concentrations and certificates, at both the undergraduate level and the graduate level. Specifically, the University will be adding: a new Bachelor of Science in Information Technology (BSIT) Artificial Intelligence (AI) concentration and corresponding Undergraduate Certificate in AI; a new Master of Science in Information Systems (MSIS)

Artificial Intelligence (AI) Management Systems concentration and corresponding Graduate Certificate in Artificial Intelligence (AI) Management Systems; two new concentrations for the Master of Education (M.Ed.) program: Educational Technology Leadership and Technology Innovations for Education; and a new M.Ed. Graduate Certificate in Instructional Design and Technology in conjunction with the existing M.Ed. Instructional Design and Technology concentration.

These changes are designed to better align with student goals and are consistent with Strayer University's long-term mission to provide high-quality education to working adults that will ensure their educational programming remains relevant for the changing needs of the workforce. Based upon previous guidance from our institutional accreditor, the Middle State Commission on Higher Education, the changes will not require substantive change review since these changes, "do not represent a significant departure in content or delivery from the degree or non-degree programs that are offered at Strayer University." These changes are collectively made in an effort to increase industry relevance and increase graduate opportunity for employment within their field of study.

No action required by the Commission at this time.

Course Change: Bachelor of Science in Criminal Justice:

In a letter dated July 6, 2023; providing notification of a proposed course change to Strayer University's Bachelor of Science in Criminal Justice (BSCJ) degree. This change is designed to better align with student goals and are consistent with Strayer University's long-term mission to provide high-quality education to working adults that will ensure their educational programming remains relevant for the changing needs of the workforce. Based upon previous guidance from our institutional accreditor, the Middle State Commission on Higher Education, this change will not require substantive change review since the change, "do not represent a significant departure in content or delivery from the degree or non-degree programs that are offered at Strayer University." For the course change, students in the BSCJ will no longer be required to take BUS 100("Introduction to Business") as part of their major courses. Instead, they will be required to take SOC 210 ("Social Intelligence"). After reviewing industry skills, the University determined that SOC 210 was a better fit for students in the BSCJ program than BUS 100. Specifically, an integral skill for criminal justice is the ability to build rapport with anyone quickly. Being able to build a connection with anyone from any socio-economic background, age, gender, and race is critical, no matter which job is being sought in the criminal justice system. SOC 210 provides students with opportunities to learn these skills.

No action required by the Commission at this time.

iii. Walden University **RE: Legal Matters Update**

In a letter dated July 6, 2023; providing update on Walden University's legal cases, as required by the Higher Education Licensure Commission's ("HELC") April 15, 2023 approval letter. During the April 2023 HELC meeting, the Commission inquired on two legal cases, Sweet v. Cardona and Carroll v. Walden University.

Sweet v. Cardona:

The class action suit is between the Department of Education and students with borrower defense applications. Walden is not a party to the case. The settlement does not determine any wrongdoing of any universities; it forgives the loans from listed institutions and outlines a timetable for doing so.

Carroll v. Walden University:

On January 12, 2022, Walden was served with a complaint filed in the United States District Court for the District of Maryland by Aljanal Carroll, Claudia Provost Charles, and Tiffany Fair against Walden for damages, injunctive relief, and declaratory relief on behalf of themselves and all other similarly-situated individuals alleging violations of Title VI of the Civil Rights Act of 1964, along with additional state and federal law violations. Plaintiffs allege that Walden has targeted, deceived, and exploited Black and female Doctor of Business Administration ("DBA") students by knowingly misrepresenting and understating the number of "capstone" credits required to complete the DBA program and obtain a degree. Plaintiffs filed an amended complaint to add an additional plaintiff, Tareion Fluker. Walden answered the amended complaint on February 2, 2023. The parties have agreed to a non-binding mediation scheduled which began on May 4, 2023. Discovery is stayed through the end of July and discussions between the parties are ongoing.

No action required by the Commission at this time.

iv. Pontifical John Paul II Institute for Studies on Marriage and Family

RE: Notice of New Programs

In a letter dated March 31, 2023; providing notification

No action required by the Commission at this time.

B. Action

i. Bethel Training Institute

RE: Letter of Request

In a letter dated July 17, 2023; from Carol J. Grant-Gordon requesting that the Commission renew Bethel's license at this time. For the reasons set forth below:

As stated; a site inspection for Bethel Training Institute's renewal application, is currently pending. I understand that the Commission is waiting for the Board of Nursing to make a decision on Bethel's licensure before deciding on the renewal application.

Bethel's hearing with the Board of Nursing is currently scheduled for September 6, 2023 (see attached). At that time, our legal counsel intends to present evidence to the Board as to why it should approve Bethel's license to continue to train Home Health Aides in the District of Columbia. Until then, however, Bethel is currently unable to enroll new students, and this has a direct adverse impact on the school's financial resources and ongoing healthcare crises in the District of Columbia.

Bethel's licensure has been questioned solely because of what the Board deems a "low pass rate" without taking into consideration any of the underlying reasons or mitigating factors. Restricting Bethel's ability to train new Home Health Aides, even at a lower passage rate than some of its peers, is fundamentally inconsistent with the overwhelming consensus among industry leaders that barriers need to be taken down to promote an influx of new home health aides, not limit available options in a time of national crisis. On behalf of Bethel, we are inviting your Commission be part of the solution and not create another administrative hurdle that will harm the health care system as a whole.

Renewing Bethel's licensure so that we can continue our mission is certainly in the best interests of all involved.

Thank you in advance for your consideration of this request.

See VII. Unfinished Business – a. Licensure Requests; Pg. 8

ii. Norwich University
RE: Annual Data Survey (ADS) Late Fee Waiver Request

In an email dated July 27, 2023; from James “Jim” A. Graves; the institution has requested a waiver for late fees of the annual data survey due to the following reasons:

“The program for which Norwich needed HELC’s endorsement (Career LAB in DC) was canceled at the end of last Spring semester (May 2023). We had no need to reapply to HELC after that point. I, as university internship coordinator, was asked to take on the annual HELC application last year from our compliance attorney. I had very little instruction on how to do this and basically figured it out on my own. I was not aware of the survey requirement, so when I saw “HELC” in the subject line in March, I ignored the two emails thinking that it was asking for a renewed application for the current academic year. I admit that this was a mistake, and when I realized what had happened, I promptly completed the survey.”

The Commission voted unanimously to proceed with the accrual of the fine, in the amount of five-hundred dollars (\$500.00) to Norwich University for late submission of the annual data survey (ADS).

iii. Colgate University
RE: Annual Data Survey (ADS) Late Fee Waiver Request

In a letter dated June 7, 2023; from Andrew W. Fagon; requesting a waiver for late fees of the annual data survey due to the following reasons:

“On May 2, 2023, I received your letter, which states that Colgate University was in violation of the District of Columbia laws 5-A DCMR 8013 and 5-A DCMR 8122.2U).

We regret that we are in violation of this request and respectfully ask that the Higher education licensure Commission waive the \$500 fine that has been imposed on Colgate University.

We make this request for the following reasons:

- Colgate University did not operate a program in 2021 and 2022;
- Colgate University has completed all applications and paid all required application fees and all late fees (total \$10,500), allowing the university to operate its program this year, 2023.
- Colgate University completed and submitted the outstanding survey on June 6, 2023.”


The Commission voted (Affirmative: Crider, Lloyd, Segar; Abstentions: Petty) to proceed with the accrual of the fine, in the amount of five-hundred dollars (\$500.00) to Colgate University for late submission of the annual data survey (ADS).

XII. Next Public Meeting: October 5, 2023

XIII. Adjournment

Having no further business, the meeting was adjourned at 2:50 pm.

Respectfully submitted,



Commissioner Julia Lara
Secretary