



**Bureau for Private Postsecondary Education**  
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**Advisory Committee Meeting Minutes  
Wednesday, February 13, 2019**

**Department of Consumer Affairs  
Hearing Room, 1<sup>st</sup> Floor  
1625 North Market Blvd.  
Sacramento, CA 95834**

**Advisory Committee Members in Attendance**

1. Diana Amaya
2. Joseph Holt
3. Katherine Lee-Carey
4. Margaret Reiter
5. Kevin Powers (on behalf of Assemblymember Jose Medina)
6. Tamika Butler
7. David Vice
8. Megumi Tsutsui

**Committee Members Absent**

Sarah Mason (on behalf of Senator Jerry Hill)  
Hanya Carbajal

**Bureau for Private Postsecondary Education (Bureau) and Department of Consumer Affairs (DCA) Staff in Attendance**

Dr. Michael Marion Jr., Bureau Chief  
Leeza Rifredi, Deputy Bureau Chief  
Beth Scott, Bureau Enforcement Chief  
Marina O'Connor, Bureau Licensing Chief  
Robert Bayles, Bureau Education Administrator  
Scott Valverde, Office of Student Assistance and Relief (OSAR) Chief  
Blessilda Canlas, Bureau Staff Services Manager I  
Kent Gray, Bureau Legislative Analyst  
Dean Grafilo, DCA Director  
Mina Hamilton, DCA Legal Counsel  
Kristy Schieldge, DCA Legal Counsel

### **Agenda #1 - Welcome, Introductions, and Establishment of a Quorum**

Committee Chair Katherine Lee-Carey called the meeting to order at 9:36 AM.

### **Agenda #2 - Public Comment on Items not on the Agenda**

No public comments.

### **Agenda #3 - Review and Approval of November 7, 2018, Advisory Committee Meeting Minutes**

Joseph Holt moved to approve the minutes; Margaret Reiter seconded the motion. (Ms. Lee-Carey: Aye; Ms. Reiter: Aye; Mr. Holt: Aye; Diana Amaya: Aye; David Vice: Aye; Tamika Butler: Abstained; Megumi Tsutsui: Abstained) The motion passed.

### **Agenda #4 - Remarks by Representative of the Department of Consumer Affairs**

Dean Grafilo, DCA Director, provided an update on DCA. He highlighted various meetings that were convened in 2018. He pointed out that the meetings fostered collaboration between DCA and various boards and bureaus, to further the mission of protecting California's consumers. He noted that DCA's 2018 Annual Report is available on the DCA website.

Mr. Grafilo reported on Governor Newsom's budget regarding DCA. He added that DCA staff met with the Governor's transition team, that have been appointed within the Governor's office. He noted that individual program meetings have been scheduled to discuss individual budgets in greater detail. He stated that the Bureau met with DCA's budget unit on January 25, 2019.

Mr. Grafilo stated that the upcoming director's quarterly meeting will be held on February 25, 2019. He noted that an update will be provided on DCA's regulation unit, the executive officer's salary study, and several division updates.

Mr. Grafilo reported that sexual harassment prevention training is mandatory in 2019. He added that all employees, board members, and advisory committee members are required to complete the training this year.

Mr. Grafilo outlined activities of the enforcement taskforce. He stated that on November 18, 2018, DCA staff, Bureau executive staff, and the Division of Investigation (DOI) met to develop an action plan to reduce and ultimately eliminate the complaint backlog. He added that the meeting resulted in the creation of a BPPE enforcement taskforce, led by the DOI staff, with the goal of significantly addressing the Bureau's enforcement activities. He noted that DCA has

provided the following resources to the taskforce: one commander from DOI, three retired annuitants from DOI, one part-time supervising investigator from DOI, support from DCA human resources in Bureau restructuring efforts, and office space at DCA headquarters for Bureau staff. He stated that the initial goal of the taskforce will be to eliminate the backlog of complaints, that are 365 days or older, right sizing the Bureau's analyst caseloads, and recommending process improvements. He added that the taskforce team is projected to be in place until June 2019.

Ms. Reiter asked if the taskforce is analyzing the Bureau's inspection backlog. Dr. Marion answered yes, and clarified that inspections fall within the enforcement unit.

Mr. Holt asked what the role and responsibilities are for the DOI commander on the taskforce. Mr. Grafilo stated that the commander oversees the taskforce.

Ms. Tsutsui asked if the results from the taskforce will be released in a separate report. Dr. Marion stated the portions of the results will be reported within the Bureau's regular reporting. Mr. Grafilo added that a status report of the taskforce will be provided at the next committee meeting.

Public Comment:

No comment.

**Agenda #5 - Bureau Operations Update and Discussion**

Bureau Organization Structure/Chart and Staffing Updates and the Bureau Strategic Vision:

Dr. Marion reported on the Bureau's organizational structure and staffing updates. He introduced his new executive assistant, Freshta Rasoli. He noted Ms. Rasoli will be a direct contact for him and the Bureau.

Dr. Marion referred the Committee to Attachment 5E in the packet. He noted that the organizational chart provided outlines the staff restructuring that has been done at the Bureau. He noted the Bureau is in the progress of implementing three phases of reorganization. He referenced the organizational chart and discussed phase one, which the Bureau began implementing in November 2018. He highlighted the creation of the unlicensed activities unit. He added that phase two will include more extensive collaboration with staff from DOI. He noted that additional updates will be provided at the next meeting regarding reorganization and process improvements resulting from phase two.

Dr. Marion provided additional information on the enforcement taskforce. He stated that compliant process timelines will be developed to better track the complaints. He added that policy and procedures will be another focus of the taskforce.

Dr. Marion stated that the Bureau's current strategic plan will expire in 2020. He added that Bureau has begun working with DCA on the development of its new strategic plan. He noted that DCA staff will be reaching out to the Committee members for input. He stated that more information on the strategic plan will be provided at future meetings.

Ms. Reiter asked what the Bureau can do to identify issues with schools before they grow into much larger issues. She stated that she would like input from Bureau staff on why the Bureau has not identified issues before they balloon into areas of prosecution, litigation, and result in major school closures. She questioned how these issues continue and how these issues are going to be addressed by the changes occurring at the Bureau. Dr. Marion explained that when the Bureau came back into existence in 2010 it was immediately facing an uphill battle with an 800 plus backlog. He added that efforts in restructuring and implanting the enforcement taskforce will help address some of the major issues. Ms. Reiter stated she is looking for more detail about the processes that occur at the Bureau. She mentioned the recent closure of Brightwood as an example. She questioned if the Bureau had any indication that the school was about to close. She questioned if there were any recent inspections of the school or citations issued. She clarified she is questioning the general processes and not regarding a specific school. She added she wants to know if the Bureau has a process of identifying issues with a school which then lead to disciplinary actions. Dr. Marion stated that he did not have specific information to provide regarding the question. He noted that the Bureau is going through changes and that the Bureau will continue to get better.

Mr. Vice commented that a major issue with schools that close is when its accrediting body revokes its accreditation. He added another major issue is when the Department of Education (Department) places the school on a status that effects its ability to disburse Title IV funds. He noted that it happens so quick due to dire financial circumstances. He continued that a school may be meeting Bureau standards but not meeting its accreditors standards.

Ms. Schieldge stated that if an issue does not rise to the level of a disciplinary action, then typically there would not be any notice. She added that generally, all across DCA, investigations are complaint driven, and complaints have to meet a standard and burden of proof in order to take any enforcement action.

Ms. Reiter stated that accrediting agencies provide information, like a show cause status, to the Bureau. She added that an accrediting agency would not revoke accreditation without first going through a lengthy process at which point the Bureau would likely have knowledge of the accrediting agencies actions. She questioned what the Bureau does after receiving notices from accrediting agencies. She asked what process is followed and what steps are taken. She further questioned what the Bureau does upon receiving notices from the Department regarding a school failing to meet financial standards. She noted that from her experience as a prosecutor she understands disciplinary actions are often driven by complaints, but generally major issues do not develop over a very short period.

Mr. Holt commented that the superstructure in place is a regulatory triad including the Department, accrediting agencies, and state approval agencies. He stated that he thinks it would be philosophically inappropriate to have any one agency be the lead agency because by design it is a regulatory triad. He noted that he agrees when there are smaller issues apparent there may also be larger issues. He continued that, in terms of the scope of a solution from the Bureau, the Bureau should focus on fulfilling its mandate more effectively and efficiently. He cautioned the Bureau from attempting to move outside of the triad, and he stressed the importance of recognizing each agency's role within the triad.

Ms. Lee-Carey questioned how the outcome of a school closure would be different if the Bureau was the first to identify issues leading up to the closure. She questioned that if the reason for closure was based on funding/financials, then how would the outcome be any different if the Bureau had previously issued a citation or a disciplinary action against the school. She questioned how the Bureau's role could change that outcome.

Ms. Reiter stated that she understands there are other agencies not necessarily fulfilling their mandate. She questioned how an accreditor can figure out there are issues with a school before the Bureau. She questioned how the Bureau addresses issues once they are identified by an accreditor. She continued that the Bureau has a variety of things it can do besides issue citations. She noted that the Bureau can ensure the students are getting a quality education. She added that the Bureau could perform an unannounced inspection.

Mr. Powers commented that he would like to see a timeline of events leading up to a school closure. He exemplified reporting on if "x" happens then "y" process happens. He continued that if a school goes on show cause or has an issue with its accreditor, then what does that trigger and what are the Bureau's responsibilities. He added that it would be helpful if the Committee could see a hypothetical example of what occurs.

Ms. Butler agreed that seeing a hypothetical walkthrough would be beneficial for understanding the process. She noted that having a procedure that is initiated through tips is not necessarily beneficial to the most vulnerable students who may not be as likely to report a tip. She added that understanding what procedures are followed to address issues that are not brought to light by a tip.

Ms. Tsutsui stated that having more details about complaints could be beneficial because many indications do originate from tips and complaints. She added that it is difficult to understand how complaints are being addressed without having much detail about how specific complaints are handled. She explained that some students are unable to illuminate an issue they are having with a school and that it would be beneficial to better understand how the system works and how the Bureau is addressing these issues.

Dr. Marion stated that examples and scenarios can be provided to the Committee.

Public Comment:

Angela Perry with the Institute for College Access and Success (TICAS) provided public comment. Ms. Perry stated she thinks the Bureau has a role within the regulatory triad to proactively work to identify issues before they lead to a school closure. She questioned what steps the Bureau takes when a school has issues with an accreditor or when the Department begins to monitor or restrict funds to a school. Ms. Perry offered to assist the Bureau in addressing issues in any way necessary.

Robert Johnson with the California Association of Private Postsecondary Schools (CAPPS) provided public comment. He explained that most school closures are planned and taught-out. He stated that problem schools that close are outliers. He continued that the Bureau should not focus on outlier scenarios but focus more on standard issues. He added that putting effort in to issues that are not based in facts is a waste of time and resources.

Mr. Johnson explained that finances are the main cause for school closures. He detailed how many large schools that closed had a letter of credit on file with the Department. He stated that had the Department released those letters of credit, then the school would have been able to shut down in an orderly fashion. He noted that advocates pushed the Department to withhold the funds that could have gone to staff and to bills, because the advocates did not want the owners of the schools to have access to the funds.

Mr. Johnson detailed the idea of allowing the Student Tuition Recovery Fund (STRF) to be used to assist closing schools with financial issues to ensure students are not as heavily impacted by the closure. He added that many times schools that close have overcommitted to leases with high overhead. He noted that there is no public subsidy for these schools, and it is over for them when they make a bad business decision.

Mr. Johnson continued that if the Department had let state approving agencies manage the disbursement of the letter of credit funds, then there could have been less impact after the abrupt closures. He noted that if a school is unable to pay staff, then the staff is not going to continue to work at the school. He added that there may be situations where the state could make an independent decision where it is appropriate to take over a closed school to ensure a proper teach-out occurs.

Mr. Johnson commented on the Bureau's inability to forecast which schools are going to close. He stated that CAPPS has better in-sources to predict when a school is going to close and still oftentimes the projections are inaccurate. He concluded that if there is a "special process" to identify when a school is going to close or not, then he is very eager to learn about that process.

Mr. Vice questioned how closely the Bureau works with the Department regarding troubled schools. He commented that the Department does not have to deal with the issues created when Title IV funding is pulled, but that the Bureau does have to deal with the issues that follow. He noted that school closures could occur more orderly if the Department and the

Bureau worked together more closely. Dr. Marion stated that the Bureau works closely with the Department. He noted that the cooperation could get better.

Ms. Lee-Carey pointed out that when an accreditor or the Department acts against a school they do not notify the Bureau until the action has already been taken. She noted that there is no law requiring any pre-action notifications be sent to the Bureau. She added that, when a school is owned by a larger corporation and that corporation is facing financial issues, sometimes the school has no indication and shows no signs of the issues at the top. She suggested that there maybe should be a discussion at the national level about how the agencies within the regulatory triad could better communicate and work together.

Ms. Reiter clarified she is suggesting the Bureau should work more proactively in addressing issues before a school closes. She added that there may be instances when the Bureau will not have any advance indication of an imminent school closure, but many of the schools that closed were prosecuted without the Bureau being on the forefront. She noted that if there are financial issues the Bureau is not aware of, then maybe the Bureau should require auditing on a more regular basis. She stated that regulations or statutes could be changed to require more reporting to the Bureau. She added that regulatory language could be changed to require schools to notify the Bureau of any actions taken by an accreditor, not just final actions.

#### Compliance and Discipline Report:

BPPE Enforcement Chief Beth School provided a report on the Bureau's Compliance and Discipline units. She discussed Attachment 5B in the meeting packet.

Mr. Holt asked what the driver is for a financial resource citation. Ms. Scott stated it could be due to the school's financial ratio or low composite score. She continued that staff reviews schools financial to determine the ratio and reviews the heightened cash monitoring (HCM) list released quarterly by the Department. Ms. Reiter asked if the HCM notices are sent to the Bureau by the schools or the Department. Ms. Scott explained notifications may come in to the Bureau from the Department and/or the school. Ms. Reiter asked if the HCM notifications are consistently sent to the Bureau. Ms. Scott explained that the Bureau has no method to determine if all HCM status change notifications are sent to the Bureau.

Ms. Amaya asked how much advance a school receives for an announced inspection. Ms. Scott stated that a notice is provided at least 7 days prior to an announced inspection.

Mr. Holt questioned how the Bureau incorporates student complaints within the scope of an inspection. Ms. Scott stated that inspectors collaborate with investigators. She elaborated that student complaints may provide insight that can point inspectors to areas of concern.

Ms. Reiter requested a timeline of events leading up to a school closure. She stated she would like to see what actions the Bureau takes prior to a large school closure. She noted a timeline would assist the Committee with understanding the Bureau's process.

Compliant and Investigation Report:

BPPE staff manager Blessilda Canlas provided a report on the complaint and investigation unit. Ms. Canlas outlined Attachment 5C in the meeting packet.

Mr. Vice asked if there was a specific type of complaint in regard to complaints that are over 3 years old. Ms. Canlas stated that the older complaints vary. She noted that some of the older complaints were internally generated.

Ms. Amaya asked how complaint priority levels are determined. Ms. Canlas explained that the level of priority is determined by a formula that considers various risk factors.

Public Comment:

Mr. Johnson provided a public comment. He stated that the 7-day notice for announced inspections is often delayed by mail. He noted that many times schools do not receive the notice until 48 hours prior to the scheduled inspection. He suggested that the Bureau could email the notice in addition to sending the notice through the mail.

Ms. Reiter made a motion that the Bureau provide the Committee with a random sampling of complaints at the next Committee meeting. Ms. Tsutsui seconded the motion. Dr. Marion noted that once reorganization of staff is completed and the new special investigator position is filled, then that request can be fulfilled.

Ms. Reiter clarified that her motion is that a random sampling of complaints and the steps that took place to resolve those complaints be provide to the Committee. Mr. Holt questioned what constitutes random. Mr. Reiter stated that by random she means a sample that is not selected to highlight certain scenarios. Dr. Marion clarified that his intent is to mail a random sample of complaints to Committee members for review. Ms. Reiter added to the motion that the sample be provided in advance to the next Committee meeting.

Mr. Powers asked for clarification on the notification process for announced inspections. Ms. Scott stated that staff contacts the school by phone prior to sending a notification letter through the mail. She added that the notification is also emailed to the school. She noted that the inspection does not actually occur until after the 7-day notification period has passed. She continued that it is roughly a three-week process before staff is able to get to the school to perform the announced inspection. Dr. Marion noted that it is not the Bureau's intent to catch a school off guard through an announced inspection.



Ms. Reiter stated there was a second needed for her amended motion. Ms. Tsutsui seconded the motion. Mr. Vice asked if by random the intent is to see random complaints that includes all the different scenarios possible. Ms. Reiter responded that she would like to see all possible scenarios included in the random sample. Ms. Hamilton noted that the motion includes the understanding that there would be redactions made to the sample to preserve the privacy of complainants and to prevent the release of any specific investigative techniques or tactics.

Ms. Lee-Carey called for a vote on Ms. Reiter's motion. (Ms. Reiter: Aye; Mr. Holt: Aye; Ms. Amaya: Aye; Mr. Vice: Aye; Ms. Butler: Aye; Ms. Tsutsui: Aye, Ms. Lee-Carey: Nay;) The motion passed.

#### Licensing Report:

Bureau Licensing Chief Marina O'Connor provided a report on the licensing unit. She outlined Attachment 5D in the meeting packet.

Ms. Reiter questioned if the Bureau could provide the Committee with a breakdown of schools' student population based on approval type. Ms. O'Connor stated that student population is not recorded in that regard. Ms. Reiter

#### Public Comment:

No comment.

#### Annual Report Unit Report:

Education Administrator Robert Bayles provided a report on the Annuals Report un. He updated the Committee on the status of the new online annual report portal. He noted that the online portal opened to schools on January 14, 2019 and the due date for submission is May 16, 2019. He added that there are currently 404 registered users with 376 institutional reports in progress.

He pointed out that the new portal has received some positive feedback from schools. He noted that schools are pleased with the ability to save progress. He added that schools have commented on the improved efficiency including not having to enter the same information multiple times.

He stated that some of the challenges include: duplicate submissions, school performance fact sheet submissions, and the input of financial statements. He added that staff has been working with the Office of Information Services (OIS) to address these issues.

### Quality of Education Report:

Mr. Bayles provided a status update on the Quality of Education Unit (QEU). He reported that the unit is currently accepting applications for an Education Specialist position. He explained that QEU has been reviewing applicant submissions, helping the Licensing unit review educational programs, and assisting the new Enforcement Task Force with matters concerning quality of education.

My. Bayles stated that there has been an increase in the number of provisional approvals for unaccredited schools that have degree programs. He noted that QEU is charged with tracking those schools and the schools progress towards accreditation.

Mr. Bayles explained that QEU staff has been observing accreditor visits to schools. He noted that staff is able to interact with the accreditors to learn about what is reviewed during an accreditation visit and to better understand the accreditor's methods and procedures.

Mr. Bayles outlined Attachment 5E in the meeting packet.

### Bureau's IT System Project Report:

Mr. Bayles provided a status update on the Bureau's IT system project. He reported that phase 2 of the project kicked off in September. He explained that a request for information was sent out in October 2019 and received responses from 13 vendors by the November 6, 2018 deadline. He added that, following a review of the vendor responses, a package containing the reviews and market research is currently pending final approval at the Department of Technology.

Mr. Bayles detailed the next step will be phase three. He explained that phase three will include collaboration with OIS to solicit vendors for software procurement, systems integration, consulting, and various other smaller contracts.

Ms. Reiter asked if there is cost estimate for the new IT system. Dr. Marion stated that a DCA Budget representative could provide an estimate at the next meeting. Ms. Reiter asked for the estimated timeframe for completion of the project. Mr. Bayles explained that the timeframe will depend on the vendor and how efficiently vendor staff and BPPE staff collaborate together. He stated that he should be able to provide additional information at the next meeting. Dr. Marion added that the goal date of completion is 2021.

Ms. Reiter asked if the Bureau's new system would have any integration with other Boards and Bureaus. Dr. Marion stated that the Bureau is communicating with other Boards and Bureaus to encourage them to adapt the new system.

Public Comment:

Mr. Johnson provided a public comment. He asked for clarification on how schools must submit financial statements for annual reporting. Mr. Bayles stated that financials cannot be uploaded through the online portal and must be mailed to the Bureau. Mr. Johnson stated that additional correspondence regarding that clarification would be helpful. Mr. Bayles replied that staff is working on sending out an additional letter. Leeza Rifredi, Bureau Deputy Chief, noted that financials must be sent to the Bureau by mail per statute or regulation.

Office of Student Assistance and Relief (OSAR) Report:

OSAR Chief Scott Valverde provided a report on OSAR. He covered OSAR's Cumulative Report within Attachment 5F of the meeting packet.

Ms. Tsutsui asked if when staff are working with a STRF claim do they try to determine all paths of eligibility. Mr. Valverde stated that staff actively seek any path a student may have to STRF eligibility.

Ms. Reiter asked if outreach and student workshops are conducted in collaboration with other agencies. Mr. Valverde stated that depending on the event there are often other agencies in attendance. He added there is generally a thorough overview of the different segments of higher education.

Mr. Valverde outlined OSAR's role and participation in activities following the closure of Brightwood College. He explained that OSAR attempted to contact, via email and phone, roughly 2800 students that were included on student rosters provided to OSAR. He explained that OSAR conducted 11 workshops for Brightwood students. He added that representatives from other agencies attending the workshops including representatives from the Department of Education regarding loan discharges. He noted that Brightwood provided a student representative at the workshops. He stated that OSAR has met with around 750 Brightwood students in person. He added that OSAR has logged 201 STRF claims from Brightwood students.

Mr. Valverde stated that he and Dr. Marion attended the Education and Licensing Subcommittee of the Board of Registered Nursing and Board of Vocational Nursing. He explained that they spoke on the topic of teach-outs and the impacts of school closures on students.

Ms. Tsutsui asked if OSAR has considered adding live webinars to its outreach efforts. Mr. Valverde replied that OSAR definitely intends to start incorporating webinars to outreach efforts. He added that staff have done conference calls for students that have been unable to attend outreach events in person.

Ms. Rifredi outlined STRF Claims within Attachment 5F of the meeting packets.

Mr. Vice requested to see the dollar amount tied to pending STRF claims at the next meeting.

Ms. Reiter questioned the number of students claiming STRF. She stated that the number is really low compared to the number of students who are likely eligible. She asked that the Bureau share any insight it may have on the low numbers. Ms. Rifredi stated that Bureau and OSAR work diligently to ensure students are aware of STRF. She added that Bureau could look into the numbers for discussion at a future meeting. Mr. Vice stated that most of the STRF eligible loans are being discharged through the Department. Ms. Reiter stated she would like to see the number of STRF claims that are pending awaiting a loan discharge decision from the Department.

Ms. Schieldge indicated she would have an analysis on the duties of OSAR and Bureau implementation at the next Committee meeting.

Public Comment:

No comment.

**Agenda Item #6 - Status Updates on Regulations**

Dr. Marion provided a status update on regulations. He outlined Attachment 6A of the meeting packet.

Public Comment:

No comment.

**Agenda Item #7 - Analysis of Income Sharing Agreements' Compliance with the Bureau's Current Laws and Regulations**

Ms. Hamilton provided an analysis of Income Sharing Agreements (ISA) compliance in regard to current Bureau laws and regulations. She explained that Bureau laws and regulations do not specifically speak to ISA. She stated that following legislative intent of the law students are not to enroll or start an education program unless the total charges of the program are disclosed.

Ms. Lee-Carey questioned ambiguities of financing in enrollment agreements. She stated that total interest charges are not necessarily known to a student prior to enrolling. Ms. Hamilton responded that traditional financing includes a set interest rate percentage. She noted that ISA's are different in that the cost is based on an undetermined future income. She added that the Bureau has seen multiple ISA's, and each must be evaluated on a case by case basis.

Ms. Lee-Carey questioned if any proposed regulatory language addressing ISA's would need to include a requirement that the enrollment outlines how much an ISA "could" cost.

Ms. Tsutsui stated that some students do evaluate the costs when shopping around for a potential educational program. She added that the cost of an ISA is speculative which makes it difficult for the student to compare different programs. She noted that current laws were setup so that students could make informed decisions. She continued that students may not be protected enough under current law if ISA's are allowed to happen.

Ms. Lee-Carey pointed out that the cost of financing is not required to be detailed in enrollment agreements. She added that the ISA's she has worked with have been very detailed in regard to minimum/maximum cost and time frames.

#### Public Comment:

Awet Kidane, representing Vemo Education, provided public comment. He stated that an ISA is additional tool that give institutions more options to offer students. He added that with an ISA an institution is taking on more risk and has higher expectations to provide students a quality education that will result in employment that pays a good wage.

Mr. Johnson provided public comment. He stated that CAPP members have shown interest in ISA's. He noted that consumer advocates pushed for full disclosures of potential market wages based on particular educational outcomes. He added that he hopes during the next sunset review that ISA's are considered to prepare for the future.

Ms. Perry provided public comment. She stated that TICAS has been tracking the use of ISA's and would like to help the Bureau in any way possible.

#### **Agenda #8 - Future Agenda Items**

Mr. Vice suggested a discussion on using STRF funds for student record maintenance or in other areas.

Ms. Lee-Carey suggested additional discussions on ISA's.

Ms. Tsutsui suggested having a follow-up discussion on the random sampling of complaints that are to be mailed to Committee members. She also suggested having a discussion on how the Bureau can make the complaint process more transparent to encourage more students to come forward with complaints.

Ms. Reiter requested an analysis leading up to and following a school closure to include a timeline and the processes followed.

Mr. Holt requested a budget update to include fees and expenses. Ms. Reiter requested projections on the expense for the IT project.

Ms. Amaya requested a Bureau staffing update to include the special task force.

**Agenda #9 - Adjournment**

Ms. Lee-Carey adjourned the meeting with the consent of all Committee members present.