

**From:** Beasley, Thomas [IDOE]  
**To:** WELLMAN, DAN  
**Subject:** RE: Ashford University Response to May 8 Letter  
**Date:** Thursday, May 19, 2016 4:40:48 PM

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Dan,

Yes. There is "no issue" with the college that is academic. There are issues with it that are legal. These I am not privy to.

Bill, Marie, it seems like everyone in VACO EDU is on a war path. The smugness on the part of Bill Spurce is almost too much. I mean what the hell would an SAA care what a USDE data base reported? I have personally used the database to verify information for Compliance Surveys that you know VA could care less about. The other thing is I have lots of emails from Marie asking her or clarification on how to advise Ashford about their move from HLC to Western region. The very issues I raised then are now being used against Ashford (and the Iowa SAA approval) and Marie acts as if these emails are immaterial or don't exist.

It is out of my hands now. I do see it as VA's knee jerk reaction to report on another "bad school" with absolutely no evidence other than "talks" that tend to lead to "settlements" that report no liability or fouls.

I can see VACO pointing to Ashford to invalidate the role of SAAs. Look what we "created" when in fact it is VA's lack of clear and concise guidance and unwillingness for anyone to make a decision that created the confusion about online schools in the first place.

If a law suit is filed it would be Ashford University v. the Iowa SAA when in fact it is Bill Spurce and VA who are pushing for me to withdrawal the approval.

For what it is worth...this is a really hot issue. I don't want or expect you to waste your earned "political capital" on Iowa. I do believe this issue will become a larger NASAA fight as I am aware of several online schools with approved online centers in one state, corporate headquarters in others and no real campus or (IPEDs facility) in that state the online center(s) operate and have an SAA approval.

Cordially,

Tom

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**From:** WELLMAN, DAN [mailto:DAN.WELLMAN@illinois.gov]  
**Sent:** Thursday, May 19, 2016 3:28 PM  
**To:** Beasley, Thomas [IDOE] <Thomas.Beasley@iowa.gov>  
**Subject:** RE: Ashford University Response to May 8 Letter

Is Ashford University licensed to offer programs in Iowa through its higher education board? Bill



Spruce has been on a war path lately – thanks for sharing that information with me. Dan

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**From:** Beasley, Thomas [IDOE] [<mailto:Thomas.Beasley@iowa.gov>]

**Sent:** Thursday, May 19, 2016 3:26 PM

**To:** WELLMAN, DAN

**Subject:** RE: Ashford University Response to May 8 Letter

Dan,

Sure.

Ashford University is closing its residential campus (some < 300 students) June 30, 2016.

Ashford moved its corporate headquarters to California some 3 years ago. When moving Ashford filed paper work with USDE that its corporate headquarters is its main campus.

A Bill Spuce checked the USDE database IPEDS and found Ashford University is not an Iowa institution per USDE. He suggested Iowa didn't have "approval authority" over the institution.

A letter will be going to Ashford University informing them Iowa is withdrawing our approval authority effective June 30, 2016. If the California SAA does not approve them before this date all veterans (even those accepted into a program when Ashford operated its "residential" campus in Iowa and Ashford reported to me and others as its "main" campus will be interrupted.

This will impact somewhere between 6K and 10K veterans and other eligible students currently in receipt of VA education benefits.

Ashford University is not the only "online" university who operates an online center in one state, a corporate headquarter' s in another, and residential campuses in even other states. So I don't see how VA can apply a USDE rule to what is essentially a Title 38 issue/concern and to just one school who in my opinion operates a business model just as all the other "online" schools do.

Some three years ago I shared this development with VA (CELO @ St. Louis, CELO at Muscogee, and the California SAA). No one had any concerns for it then. California informed me they would never approve Ashford to operate in their state. No reason was given as to why.

St. Louis told me to report what I saw. A residential campus, an online center, a headquarters in California.

It seems only VA wants to interrupt veterans and military students currently enrolled. Title IV has no concerns about what is operating in Iowa now or after the residential campus closes. Need based online students will not be interrupted because of the closure of the residential campus.

Anyway...I see this as a NASAA issue. It is power grab on VA's part that will do little more than produce a lawsuit and student/veterans "suddenly" interrupted probably dependent on the housing



allowance, the education, or the delivery/program enrolled in.

Cordially,

Tom

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**From:** WELLMAN, DAN [<mailto:DAN.WELLMAN@illinois.gov>]  
**Sent:** Thursday, May 19, 2016 3:08 PM  
**To:** Beasley, Thomas [IDOE] <[Thomas.Beasley@iowa.gov](mailto:Thomas.Beasley@iowa.gov)>; Major, Fred (DVA) <[FMajors@dva.IN.gov](mailto:FMajors@dva.IN.gov)>  
**Subject:** RE: Ashford University Response to May 8 Letter

Tom, Good afternoon! I am not sure I fully understand all the issues at question with Ashford University. Do you think you could give me a call next Monday or Tuesday to discuss? Dan

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**From:** Beasley, Thomas [IDOE] [<mailto:Thomas.Beasley@iowa.gov>]  
**Sent:** Tuesday, May 17, 2016 12:02 PM  
**To:** WELLMAN, DAN; Major, Fred (DVA)  
**Subject:** FW: Ashford University Response to May 8 Letter

Dan and Fred,

It seems this kind of position is unprecedented by VA. Ashford University has a "residential campus" in Clinton, Iowa and an online Center. Ashford University's move to the western region has been in the works for more than 3 years. And Ashford describes what was moved to San Diego was their corporate headquarters. It is my understanding documents the university filed with USDE the university lists Ashford San Diego as the "main campus" for USDE reasons. This discrepancy was pointed out to VA at least three years ago. No one raised an issue or even cared.

It is my understanding neither Iowa nor California want veterans enrolled under the approval (when Ashford had a residential campus) wants to see veterans or other eligible interrupted. So what I see as unprecedented is VA's assertion the Iowa SAA's approval ends upon the closure of the Residential campus. Why wouldn't those enrolled under the approval authority be allowed to complete?

Finally, why isn't VA directing California to approve Ashford in the same way they are directing me to pull Iowa's approval? It is ridiculous to tell me and Ashford their operation is no longer approved for Title 38 (although Title IV has no issues with the main campus in California and the "online center" in Iowa.

As mentioned earlier, I see no difference in how Ashford operates than other online schools. It would seem Bill's guidance would impact other online schools who have online centers (and GI Bill approvals) in states separate from where they have a campus or branch.

Cordially,

Tom

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**From:** Spruce, Bill, VBAVACO [<mailto:Bill.Spruce@va.gov>]  
**Sent:** Tuesday, May 17, 2016 11:32 AM  
**To:** [Vickie.Schray@bpiedu.com](mailto:Vickie.Schray@bpiedu.com)  
**Cc:** Proesch, Nicole [IDOE] <[Nicole.Proesch@iowa.gov](mailto:Nicole.Proesch@iowa.gov)>; Beasley, Thomas [IDOE] <[Thomas.Beasley@iowa.gov](mailto:Thomas.Beasley@iowa.gov)>; George, Marie L., VBASLOU <[marie.george@va.gov](mailto:marie.george@va.gov)>; Marks, Michael W., VBAMUSK <[michael.marks1@va.gov](mailto:michael.marks1@va.gov)>  
**Subject:** FW: Ashford University Response to May 8 Letter

Vickie,

I am following up on my email from last Thursday with something somewhat more concrete in regard to your school's letter to the Iowa State Approving Agency (attached). While we are aware that a response from the Iowa State Approving Agency is forthcoming, it is the view of VA that, based on the information contained in your letter, Ashford University would no longer be eligible for approval through the State of Iowa due to failure to meet the definition of a "main campus" or "branch campus" as defined in § 21.4267 of title 38, Code of Federal Regulations. Without a valid approval by a State Approving Agency, VA would be required to discontinue benefit payments for enrollment in terms beginning after June 30, 2016.

VA is greatly concerned about the potential negative impact that the June 30th closure of the campus in Clinton, IA, could have on benefit payments for veterans who will continue to be enrolled at Ashford Online after that date. Consequently, we would suggest that you seek approval through the State Approving Agency of jurisdiction for any location that meets the definition of a "main campus" or "branch campus" in order to ensure that student Veterans and other eligible beneficiaries are able to continue to receive benefits for pursuit of their chosen programs of education.

Vr,

Bill Spruce  
Assistant Director for Oversight and Outreach  
VA Education Service

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**From:** Spruce, Bill, VBAVACO  
**Sent:** Thursday, May 12, 2016 8:27 AM  
**To:** 'Vickie.Schray@bpiedu.com'  
**Cc:** George, Marie L., VBASLOU; Beasley ([thomas.beasley@iowa.gov](mailto:thomas.beasley@iowa.gov)); 'Carson, Daryl, VBASDGO'; Marks, Michael W., VBAMUSK; 'Nicole.Proesch@iowa.gov'  
**Subject:** RE: Ashford University Response to May 8 Letter

Vickie,



Good morning... this communication should in no way be viewed as an official response or a decision on your recent letter to the Iowa SAA regarding continued "presence" and approval in Iowa; the folks in Iowa should be responding in short order. However, I want to make sure I get on record before any further time passes that I believe Ashford should begin the process of getting approved by CSAAVE, regardless of Iowa's view on the matter. There's no harm in having your school's acknowledged "main campus" and corporate home approved by the State Approving Agency in California and I believe it would be prudent to get that process started without further delay.

Vr,

Bill Spruce  
VA Education Service  
202-461-9839