

From: [Brown, Todd \[ICSAC\]](#)
To: [Beasley, Thomas \[IDOE\]](#)
Subject: RE: Title IV question with implications
Date: Tuesday, May 10, 2016 5:21:26 PM

☺ I wish I did Tom! If anything opens up, I'll definitely let you know. Promise.

If Matt's program is Title IV eligible currently, I don't think he would need to change it unless the US Department of Education instructed him to do so (for Title IV eligibility).

Todd

From: Beasley, Thomas [IDOE]
Sent: Tuesday, May 10, 2016 3:30 PM
To: Brown, Todd [ICSAC]
Subject: RE: Title IV question with implications

Todd,

I don't know if this would help Matt but it seems to me he should not change his program. Simply note veterans not eligible to receive GI Bill benefits until they meet the VA requirements for admittance into a commercial pilot degree program. I suspect VA will still push back, but veterans have no requirements to use their benefits when they are eligible and enrolled. Once they meet VA's arbitrary and capricious requirement they could then progress through his program.

Doing it this way would demonstrate VA's intent to cost shift the cost of pilots onto need based programs. It would seem VA's requirement would not apply because the school has alerted veterans and other eligible VA has a requirement that prohibits the use of VA funds.

Does this make sense...as far as if Matt's program is eligible for Title IV there is no requirement for him to change it for USDE reasons.

I am getting a lot of heat over Ashford University. You have any positions open over there? Pencil sharpener, coffee grinder, a person to fluff your chair between meetings? If so let me know.

It seems VA has recently become aware Ashford University is a California institution. I've been informing them of this since 2013 and Ashford's concerns about the impact of moving to Western accreditation. It goes deeper than this. Someone from Ashford, someone formerly with USDE as an Assistant Secretary, reached out to Carolyn Small. She might have a better idea than me what Ashford's issue is. I am just being asked, directed, informed to withdraw their GI Bill approval effective June 30, 2016 and the impact may be VA discontinues some 10k veterans already pursuing programs.

Just crazy. So...I am serious if you need a sharpener or grinder.

Tom



From: Brown, Todd [ICSAC]
Sent: Tuesday, May 10, 2016 3:01 PM
To: Beasley, Thomas [IDOE] <Thomas.Beasley@iowa.gov>
Subject: RE: Title IV question with implications

Hey Tom!

In regard to your question, I believe that Title IV eligibility and VA program eligibility are mutually exclusive (a college could be Title IV eligible, but not approved for VA benefits, and vice versa). Hope this helps; hope all is well!

Todd

From: Beasley, Thomas [IDOE]
Sent: Tuesday, May 10, 2016 1:01 PM
To: Brown, Todd [ICSAC]; Matthew Thompson
Cc: Burrows, Barbara [IDOE]
Subject: Title IV question with implications

Todd,

I hope you know Dr. Matt Thompson. We were once friends. Then he worked with me on a program approval and well...you know the old adage I am here to help. Dr. Thomson is the CAO at Indian Hills Community College.

VA looked at one of his programs specifically. The college has a commercial pilot degree program. A year or two ago the college partnered with a California 141 school to offer more opportunity. The program is and remains (for Iowa Department of Education purposes, the Higher Learning Commission, and the college's Board of Governors) a wholly Indian Hills program. In academic terms the San Diego site serves as laboratory by MOU.

Okay...here is the question. VA is defining the MOU as a contract and claims contracted IHL with flight cannot use VA funds to pay for a private pilot's license. The private pilot's license has long been someone's requirement (FAA, the schools) and so VA is essentially directing Matt bring his program entirely "in-house" or delete the private pilots portion from his approved curriculum. Attempts to explain this all to VA have been futile. So could Matt and the college allow veterans to progress through the program on Title IV alone until the point VA claims they would be eligible for GI Bill education assistance? There is no requirement a veteran use his benefit when eligible. It is also quite common veterans conserve VA benefits while attending community colleges anticipating private or state universities more expensive.

I am not sure this idea addresses Matt's dilemma totally. It would seem to me if veterans entered the program after meeting VA's criteria (obtaining a private pilot's license) at least needy veterans would be allowed to enroll.

Dr. Burrows and Dr. Thompson were involved in the program modification when it was then understood the program was deemed approved under PL 111-377. My activity was involved to ask questions which initially VA agreed with (the program modification was deemed approved) until a media report on rotary wing programs (I assume technically continuing education programs) offered on some community colleges out west charged and were paid by VA as much as \$100K per semester. This was never the case with Indian Hills program and one thing we (Matt, my activity, the Department) ensured (continue as eligible for Title IV assistance) as part of the department or college's approval criteria.

Cordially,

Tom

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From: [Beasley, Thomas \[IDOE\]](#)
To: [Proesch, Nicole \[IDOE\]](#)
Subject: RE: Withdrawal
Date: Monday, May 09, 2016 4:54:19 PM

Ms. Proesch,

In the future I will hand carry anything my activity generates that includes a letter for your review or comment. When this matter started I thought it was a relatively simple one that was decided by attorneys who at least use the same terms or use terms precisely. I never imagined the drama. And much as I try to live drama free...it seems life keeps pulling me to it.

Cordially,

Tin

From: Proesch, Nicole [IDOE]
Sent: Monday, May 09, 2016 3:50 PM
To: Beasley, Thomas [IDOE] <Thomas.Beasley@iowa.gov>
Subject: RE: Withdrawal

Found it. I have an inbox in my office which would be more appropriate for things for me.

From: Beasley, Thomas [IDOE]
Sent: Monday, May 09, 2016 3:47 PM
To: Proesch, Nicole [IDOE] <Nicole.Proesch@iowa.gov>
Subject: RE: Withdrawal

Ms. Proesch,

I believe the letter is in the box outside the office behind Cheryl. It was where Deb Darge told Rebecca to put it.

Rebecca has left for the day. I am not sure where she got the addresses for the cc'd parties.

I understand VA and Ashford University had a conference call today. I was not asked or invited to participate.

Ms. Schray reported she would send a response to VA's concerns. She had previously informed me a response to Iowa's letter would be received NLT today.

I have no other information.

Cordially,

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