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ASH1737
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**Statement Last Revised**: May 25, 2016
From: Marcy Ramsey <MRamsey@wascsenior.org>
Date: July 29, 2014 at 10:20:56 AM PDT
To: "Williams, Lorraine" <Lori.Williams@ashford.edu>, "Rogers, Cheryl" <Cheryl.Rogers@ashford.edu>
Cc: Richard Winn <rwinn@wascsenior.org>, Sharyl McGrew <smcgrew@wascsenior.org>, Marcy Ramsey <MRamsey@wascsenior.org>, "Pattenaude, Richard" <Richard.Pattenaude@ashford.edu>, "Crenshaw, Michelle" <Michelle.Crenshaw@ashford.edu>

Subject: WSCUC Sub Change Review - Commission Approval: AshU – Master of Accountancy and MA Psychology (Please print and retain for your records)

Dear ALO,

This email serves as official notice that the following proposal has been granted final approval by the WASC Senior College and University Commission:

ASHFORD UNIVERSITY
Master of Accountancy (Distance Education Program)
Master of Arts In Psychology (Distance Education Program)

DATE OF COMMISSION APPROVAL
July 28, 2014

Please print and retain this email for your records. You may also record this date of Commission Approval on your Substantive Change Action Report, which was previously sent with notification of Interim Approval.

PROGRAM IMPLEMENTATION
Please fill the Program Implementation Form and return to the WSCUC office within 30 days of the program start date. Please note that the submission of this form is required to confirm the existence of the program and will trigger inclusion of the program on the Off-Campus/Distance Education area of the WSCUC website for purposes of financial aid eligibility verification by the U.S. Department of Education.

Link to form: http://www.wascsenior.org/content/program-implementation-form

If you have any questions, please contact your WASC Staff Liaison:

Richard Winn
rwinn@wascsenior.org

Marcy Ramsey
Accreditation Resources Coordinator
WASC Senior College and University Commission
985 Atlantic Ave, Suite 100
Alameda, CA 94501
510-995-3164
Hi, Do any of you have the final approval emails for Accounting and Psychology where Marcy sends an email and indicates that the programs were officially approved by the Commission (not interim approval...I found those on the shared drive)? I had them but I can’t access them very easily now since the massive email archiving activity.

Thanks.

Pat Ogden
ASSOCIATE VICE PRESIDENT
ACREDITATION SERVICES & COMPLAINE

P. 858.668.2586 x4976
C. 858.774.6545
F. 866.923.3964

Bridgepoint Education
INNOVATIVE SOLUTIONS THAT ADVANCE LEARNING
From: Weisel, Sandra <Sandra.Weisel@bpiedu.com>
Sent: Wednesday, May 25, 2016 11:46 AM
To: Weisel, Sandra
(Please print and retain for your records)

From: Williams, Lorraine
Sent: Tuesday, October 28, 2014 12:33 PM
To: Marcy Ramsey
Cc: Rogers, Cheryl; Richard Winn; Sharyl McGrew; Pattenaude, Richard; Ogden, Patricia
Subject: Re: WSCUC Sub Change Review - Commission Approval: AshU – MS Criminal Justice (Please print and retain for your records)

Thanks very much, Marcy, for the official notification. We are very excited to launch this new program. Thank you for the commendations and recommendations, too. We will certainly continue to address the recommendations in our overall work and planning at AU.

Dr. Lori Williams
Provost, Ashford University
Sent from my iPad

On Oct 28, 2014, at 10:08 AM, Marcy Ramsey <MRamsey@wascsenior.org> wrote:

Dear ALO,

This email serves as official notice that the following proposal has been granted final approval by the WASC Senior College and University Commission:

ASHFORD UNIVERSITY
Master of Science in Criminal Justice
(Distance Education Program)

DATE OF COMMISSION APPROVAL
October 27, 2014

Please print and retain this email for your records. You may also record this date of Commission Approval on your Substantive Change Action Report, which was previously sent with notification of Interim Approval.

PROGRAM IMPLEMENTATION
Please fill the Program Implementation Form and return to the WSCUC office within 30 days of the program start date. Please note that the submission of this form is required to confirm the existence of the program and will trigger inclusion of the program on the Off-Campus/Distance Education area of the WSCUC website for purposes of financial aid eligibility verification by the U.S. Department of Education.

Link to form: http://www.wascsenior.org/content/program-implementation-form

If you have any questions, please contact your WASC Staff Liaison:
Richard Winn  
rwinn@wascsenior.org

Marcy Ramsey  
Accreditation Resources Coordinator  
WASC Senior College and University Commission  
985 Atlantic Ave, Suite 100  
Alameda, CA 94501  
510-995-3164

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February 24, 2015

Dr. Lori Williams
Provost and Chief Academic Officer, Accreditation Liaison Officer
Ashford University
8620 Spectrum Center Boulevard
San Diego, CA 92123

RE: WSCUC Approval of Master of Arts in Special Education (Distance Education Program)

Dear Dr. Williams:

This communication regards WASC Senior College and University Commission (WSCUC)’s approval of the Master of Arts in Special Education (MASE) at Ashford University. The MASE is a 30 credit hour program and was approved by the Commission on February 11, 2015.

Please advise if additional information is required.

Sincerely,

[Signature]

Sharyl McGrew
Director of Substantive Change and Committee Relations
October 20, 2015

Dr. Lori Williams
Provost and Chief Academic Officer, Accreditation Liaison Officer
Ashford University
8620 Spectrum Center Boulevard
San Diego, CA 92123

RE: Master of Information Systems Management (Distance Education Program)

Dear Dr. Williams:

The WASC Senior College and University Commission has approved Ashford University’s Master of Information Systems Management program. The program is 42 credits and received approval from the Commission on October 12, 2015.

WASC Senior College and University Commission (WSCUC) accredits baccalaureate and graduate degree-granting institutions in California, Hawaii and the Pacific Islands. *All programs, courses and departments are included under this accreditation, including off-campus programs.*

Accreditation is an important form of institutional accountability designed to serve the higher education community, prospective and current students, their parents, and the general public. Accreditation certifies that an institution meets established standards and is achieving its own clearly defined objectives. Accreditation also encourages institutional development and improvement through self-study and periodic review. Federal and state governments consider accreditation a reliable indicator of institutional quality.

WSCUC is one of seven regional accrediting commissions, and is recognized by the United States Department of Education and the Council for Higher Education Accreditation.

Sincerely,

Tarnia Lowe
Accreditation Process Coordinator
February 8, 2016

To Whom It May Concern:

This is to certify that WASC Senior College and University Commission (WSCUC) accredits Ashford University. Ashford University was granted accreditation November 8, 2013 and continues to be accredited at present.

WSCC Senior College and University Commission has approved Ashford University's Master of Arts in Early Childhood Education Leadership program. The program is 30 credits and received approval from the Commission on February 3, 2016.

WSCC Senior College and University Commission (WSCUC) accredits baccalaureate and graduate degree-granting institutions in California, Hawaii and the Pacific Islands. All programs, courses and departments are included under this accreditation, including off-campus programs.

Accreditation is an important form of institutional accountability designed to serve the higher education community, prospective and current students, their parents, and the general public. Accreditation certifies that an institution meets established standards and is achieving its own clearly defined objectives. Accreditation also encourages institutional development and improvement through self-study and periodic review. Federal and state governments consider accreditation a reliable indicator of institutional quality.

WSCU is one of seven regional accrediting commissions, and is recognized by the United States Department of Education and the Council for Higher Education Accreditation.

Sincerely,

[Signature]

Tarmia Lowe
Accreditation Process Coordinator
WSCU Senior College and University Commission (WSCUC)
March 9, 2016

Dr. Lori Williams
Provost and Chief Academic Officer, Accreditation Liaison Officer
Ashford University
8620 Spectrum Center Boulevard
San Diego, CA 92123

The WASC Senior College and University Commission (WSCUC) has approved Ashford University’s Master of Public Health program. The program is 42 credits and received approval from the Commission on March 7, 2016.

In addition, the seven bachelor’s-level degree programs listed below are approved under WSCUC’s General degree level approval status. General approval permits Ashford to offer degree programs at the undergraduate level without prior approval from the WSCUC Substantive Change Committee and the Commission.

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<td>Bachelor of Arts in Marketing</td>
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<tr>
<td>Bachelor of Science in Computer Software Engineering</td>
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<td>December 2016</td>
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<td>Bachelor of Science in Human Services Leadership</td>
<td>120</td>
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<td>Bachelor of Science in Information Technology</td>
<td>120</td>
<td>December 2016</td>
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<tr>
<td>Bachelor of Education Studies—Multiple Subject Credential</td>
<td>124</td>
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</tr>
<tr>
<td>Bachelor of Education Studies—Single Subject Credential</td>
<td>124</td>
<td>May 2017</td>
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</table>

Please let me know if anything else is required.

Sincerely,

[Signature]

Tarmia Lowe
Accreditation Process Coordinator
WASC Senior College and University Commission (WSCUC)
April 14, 2016

Dr. Lori Williams  
Provost and Chief Academic Officer, Accreditation Liaison Officer  
Ashford University  
8620 Spectrum Center Boulevard  
San Diego, CA 92123

RE: Master of Science in Instructional Design & Technology (Distance Education Program)

Dear Dr. Williams:

The WASC Senior College and University Commission (WSUCU) has approved Ashford University's Master of Instructional Design & Technology program. The program is 36 credits and received approval from the Commission on April 13, 2016.

WSCUC accredits baccalaureate and graduate degree-granting institutions in California, Hawaii, and the Pacific Islands. All programs, courses, and departments are included under this accreditation, including off-campus programs.

Accreditation is an important form of institutional accountability designed to serve the higher education community, prospective and current students, their parents, and the general public. Accreditation certifies that an institution meets established standards and is achieving its own clearly defined objectives. Accreditation also encourages institutional development and improvement through self-study and periodic review. Federal and state governments consider accreditation a reliable indicator of institutional quality.

WSCUC is one of seven regional accrediting commissions and is recognized by the United States Department of Education and the Council for Higher Education Accreditation.

Sincerely,

[Signature]

Tarmia Lowe  
Accreditation Process Coordinator
May 19, 2016

Dr. Mihaela Tanasescu  
Acting VP for Academic Affairs and  
Ashford University  
8620 Spectrum Center Boulevard  
San Diego, CA 92123

RE: Master of Science in Systems Engineering/Master of Science in Engineering in Systems Engineering (Distance Education Program)

Dear Dr. Tanasescu:

The WASC Senior College and University Commission has approved Ashford University’s Master of Science in Systems Engineering/Master of Science in Engineering in Systems Engineering. The program is 36 credits and received approval from the Commission on May 16, 2016.

WASC Senior College and University Commission (WSCUC) accredits baccalaureate and graduate degree-granting institutions in California, Hawaii, and the Pacific Islands. All programs, courses, and departments are included under this accreditation, including off-campus programs.

Accreditation is an important form of institutional accountability designed to serve the higher education community, prospective and current students, their parents, and the general public. Accreditation certifies that an institution meets established standards and is achieving its own clearly defined objectives. Accreditation also encourages institutional development and improvement through self-study and periodic review. Federal and state governments consider accreditation a reliable indicator of institutional quality.

WSCUC is one of seven regional accrediting commissions and is recognized by the United States Department of Education and the Council for Higher Education Accreditation.

Sincerely,

[Signature]

Tarmia Lowe  
Accreditation Process Coordinator  
WASC Senior College and University Commission (WSCUC)
February 26, 2014

Dr. Lori Williams  
Provost  
Ashford University  
8620 Spectrum Center Boulevard  
San Diego, CA 92123-1406  

Dear Dr. Williams:

By means of this letter I am confirming that Ashford University has been designated as having a “General” (or “G”) degree level approval for bachelor’s-level degree programs. The WASC Policy on Degree Level Approval Status delineates this designation as follows:

**General Approval.** General approval permits an institution to initiate degree programs at the specified degree level(s) without prior review and approval by the Substantive Change Committee or the Commission. Institutions may qualify for general approval at a specified degree level if they have offered 10 or more degree programs at the specified degree level in five or more different disciplinary areas or fields for at least 10 years, and have demonstrated through the accreditation review process the quality of both the degree programs offered and the processes used to initiate, monitor and review degree programs at that level.

The institution is responsible for reporting to the Commission any new degree programs initiated under its general approval as part of its Annual Report. The institution is also responsible for demonstrating, at the time of its comprehensive review, that it has monitored the quality of new programs through assessment, program review and other means that are linked to program improvement. In addition, the institution is responsible for identifying clear outcomes and quality performance indicators for each degree, which are regularly tracked to support review and improvement of degree programs individually, and programs offered at that degree level collectively.

We wish you continued success as you deliver these and other programs to your students.

Sincerely,

[Signature]

Richard Winn  
Senior Vice President
August 4, 2015

Dr. Lori Williams  
Provost and Chief Academic Officer, Accreditation Liaison Officer  
Ashford University  
8620 Spectrum Center Boulevard  
San Diego, CA 92123  

RE: Bachelor of Science in Nursing - RN to BSN Program (Distance Education Program)

Dear Dr. Williams:

This communication regards WASC Senior College and University Commission (WSCUC)'s approval of the Bachelor of Science in Nursing - RN to BSN Program. Ashford is designated as an institution with “General” degree level (G-level) approval at the bachelor’s level. General approval permits an institution to offer degree programs at the undergraduate level without prior approval from the WSCUC Substantive Change Committee and the Commission. The Bachelor of Science in Nursing - RN to BSN Program, which is a 120 credit hour program with an anticipated launch of January 1, 2016, is approved under the General degree level approval status.

For your convenience I have attached the University’s G-level confirmation letter. Please let me know if anything else is required.

Sincerely,

Tarmia Lowe  
Accreditation Process Coordinator  
WSC Senior College and University Commission (WSCUC)
June 3, 2014

Ms. Erica Smith
Manager, Licensing Unit
Bureau for Private Postsecondary Education
2535 Capitol Oaks Drive, Suite 400
Sacramento, CA 95833

Dear Ms. Smith:

This communication regards WASC Senior College and University Commission (WSCUC)'s approval of the Bachelor of Science in Health Information Management (BSHIM) at Ashford University. Ashford University is designated as an institution with "General" degree level (G-level) approval at the bachelor's level. General approval permits an institution to offer degree programs at the undergraduate level without prior approval from the WSCUC Substantive Change Committee and the Commission. The Bachelor of Science in Health Information Management, which is a 120 credit program with an anticipated launch of July 1, 2014, is approved under the General degree level approval status.

For your convenience, I have attached the University's G-level confirmation letter. Please advise if additional information is required.

Sincerely,

[Signature]

Marcy Ramsey
Accreditation Resources Coordinator
510-995-3164

cc: Dr. Lori Williams, Provost, Ashford University
March 9, 2016

Dr. Lori Williams  
Provost and Chief Academic Officer, Accreditation Liaison Officer  
Ashford University  
8620 Spectrum Center Boulevard  
San Diego, CA 92123

The WASC Senior College and University Commission (WSCUC) has approved Ashford University’s Master of Public Health program. The program is 42 credits and received approval from the Commission on March 7, 2016.

In addition, the seven bachelor’s-level degree programs listed below are approved under WSCUC’s General degree level approval status. General approval permits Ashford to offer degree programs at the undergraduate level without prior approval from the WASC Substantive Change Committee and the Commission.

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<thead>
<tr>
<th>Name of Undergraduate Program</th>
<th>Credits</th>
<th>Proposed Start Date</th>
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<tbody>
<tr>
<td>Bachelor of Arts in Early Childhood Development with Differentiated Instruction</td>
<td>120</td>
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<tr>
<td>Bachelor of Arts in Marketing</td>
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<td>Bachelor of Science in Computer Software Engineering</td>
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<tr>
<td>Bachelor of Education Studies—Single Subject Credential</td>
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<td>May 2017</td>
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</table>

Please let me know if anything else is required.

Sincerely,

[Signature]

Tarmia Lowe  
Accreditation Process Coordinator  
WASC Senior College and University Commission (WSCUC)
Statement of Accreditation Status
Ashford University

8620 Spectrum Center Boulevard
San Diego, CA 92123-1406
United States

OPEID □ : 001881

Telephone: 866-974-5700
Fax: 888-322-4098
URL: http://www.ashford.edu

Student Achievement URL □ :
http://assessment.ashford.edu/behind-numbers/institutional-data/cohort-retention...

Public Statement: None

Current Accreditation Status □ : Accredited

Most Recent Commission Action:
Friday, June 19, 2015

Staff Liaison □ : Geoffrey Chase

First Accredited □ : 2013
**Undergraduate FTE:** 45,333

**Graduate FTE:** 5,889

**Financial Structure Type:** For Profit

**Sponsorship:** Proprietary with parent/board

**Academic Calendar:** Continuous

**Distributes Federal Financial Aid:** Yes

---

### Commission Actions

### Personnel

### Locations

### Degrees

### Upcoming reviews

---

### External Resources

<table>
<thead>
<tr>
<th>Degree Program</th>
<th>Degree Level</th>
<th>Year Implemented</th>
<th>Modality</th>
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**Report New Degree Programs**

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**ASH1755**
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<td>Business Information Systems</td>
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<td>Complementary and Alternative Health</td>
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<td>Computer Science and Mathematics</td>
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<td>Consumer and Family Financial Services</td>
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<td>Visual Art</td>
<td>Bachelors</td>
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<td>On-site</td>
</tr>
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</table>

Statement Last Revised: May 25, 2016
Good afternoon —

I wanted to make sure you are aware of and have received a copy of the attached letter from Iowa Department of Education, granting a stay of Iowa’s withdrawal of approval, for a maximum of 90-days from the date of their letter (June 20th), or when CSAAVE approves Ashford University — whichever comes first. This will ensure veteran students have access to their benefits as we transition to California approval, and provide some relief to CSAAVE, as well, given the very short time frame that was provided for review and approval.

Please be assured, Ashford is still moving quickly, and are gathering information to provide a response to your letter of June 17th, which identifies deficiencies in Ashford's application and materials. They will forward that information to you as soon as possible.

Please let me know if you have questions or concerns.

KVO

Kathleen Van Osten
MVM Strategy Group
kvanosten@mvmstrategy.com
Office: 916-444-3108
Cell: 916-605-9293
Dear Ms. Stewart,

Attached is CSAAVE’s letter in response to Ashford University’s application submission. As a courtesy, this letter is being sent via email and the original will be sent via U.S. mail. If you have any questions, you will find contact information for the assigned Specialist. Thank you.

CSAAVE
1227 O Street, Suite 625
Sacramento, CA 95814
June 17, 2016

Stephanie Stewart  
Ashford University  
8620 Spectrum Center Boulevard  
San Diego, CA 92123  

RE: Initial Application for Approval of Accredited Proprietary Institutions  

Dear Ms. Stewart:

On June 1, 2016, the California State Approving Agency for Veterans Education (CSAAVE), a division of the California Department of Veterans Affairs, received an initial Application for Approval of Accredited Programs for the training of Veterans at Ashford University (Ashford), 8620 Spectrum Center Boulevard, San Diego, CA 92123. In response to Ashford’s application, CSAAVE immediately notified Ashford that the application was incomplete and required submission of additional documentation. On June 2 and June 6, 2016, Ashford provided the required documents to complete the application. On June 8, 2016, CSAAVE deemed the application complete and began a comprehensive review. Based on CSAAVE’s review, it has been determined that Ashford’s application fails to be sufficient for a grant of CSAAVE approval, at this time.

CSAAVE has authority and responsibility to approve an application when the school and its accredited courses are found upon investigation to have met all of the criteria found in 38 CFR §21.4253(d) and other applicable regulations. Institutions desiring to enroll veterans and other eligible persons in accredited courses may be deemed qualified, upon submission of a written application for approval of such courses. Applications must demonstrate an institution’s full compliance with the requirements and standards defined in 38 CFR §21.4253 and other applicable regulations. An institution’s application must also include detailed information and supporting documentation, clearly evidencing that approval requirements and standards are met and no deficiencies exist.

CSAAVE conducted a comprehensive review of Ashford’s application submission and determined that there is insufficient evidence to support Ashford’s full compliance with applicable approval standards. In an effort to assist the school address deficiencies in the application, the following is a summation of issues, information, and documentation that are necessary and required, before Ashford’s application can be considered for CSAAVE approval. Ashford must provide a response to each identified question, as referenced in the application sections below.
Section 1- Institution Information:

7. Type of Ownership:

Ashford University identified itself as a Corporation. Information obtained from the California Secretary of State identifies Ashford’s ownership status as Ashford University, LLC. Information found in the August 8-10, 2015, Report of the WSCUC Special Team Visit, page 3, Section I-Overview and Context, identifies that Ashford University was acquired by Bridgepoint Education, Inc. and became a for-profit limited liability company in 2005.

Please clarify the ownership status of Ashford University, San Diego and submit verifiable documentation, as filed with the Secretary of State and/or the Western Association of Schools and Colleges (WASC).

Section 2- Documentation required for all institutions:

2. Catalog:

CSAAVE is unable to determine the operational status of Ashford University, including its administrative structure, faculty resources, programs, policies, and available services administered at the proposed San Diego campus. Information contained in Ashford’s 2016-2017 catalog fails to clearly define how the San Diego campus operates as a main campus, as prescribed by 38 CFR §21.4266(a)(3). While the catalog identifies policies, services, programs, administrators, and available resources, there fails to be delineation between the proposed San Diego campus and Ashford’s out-of-state campus. Ashford’s catalog makes reference to the proposed San Diego campus as “Administrative,” but fails to include information evidencing that the proposed campus meets the definition of a school, educational institution, or institution, pursuant to 38 CFR §21.4200.

The proposed San Diego campus must possess adequate space, equipment, instructional material, and instructor personnel to provide training of good quality, pursuant to state and federal law. Additionally, the institution must demonstrate that it employs adequate directors, administrators, and instructors with educational and experience qualifications at the proposed institution and for which approval is sought.

Please submit to CSAAVE all of the following:

I. A revised catalog specific to the proposed San Diego campus which includes each policy referenced in 38 CFR §21.4253(d). Submit three copies of the catalog.

II. An organizational chart that specifically identifies and delineates the reporting structure of the campus director, administrators, and faculty members employed at the proposed San Diego campus.

III. Copies of the duty statements or job descriptions for the campus director, each administrator, and faculty member, which includes sufficient detail to clearly identify their roles and responsibilities at the proposed San Diego campus.

IV. A detailed description of available equipment, space, resources, and instructional materials utilized at the proposed San Diego campus to administer resident and online instruction.
3. Approval Criteria Form:

Submit a new Approval Criteria Form based on the updated catalog.

4. Signed True and Correct Form:

Submit a new True and Correct Form with each updated catalog.

8. VA Forms:

The institution must designate a school certifying official at the proposed San Diego campus, pursuant to 38 CFR §21.4266(c)(2). Submit a new Form 22-9794 identifying the on-site school certifying official(s).

9. Certificate of Status:

If Ashford modifies its ownership status with the California Secretary of State, as referenced in Section 1.7 above, please submit a new Certificate of Status.

Section 3- Institute of Higher Learning (IHL) programs:

The application included website printouts of WASC's Statement of Accreditation Status dated May 26, 2016 and letters issued by WASC, all of which reference approval of distance education and onsite courses. The application requires submission of documentation, issued by the accrediting body.

Please submit a current list of approved programs as issued by WASC.

Section 4- Non-college degree (NCD) programs:

Ashford’s application does not include a request for approval of NCD programs. No additional information is required for this application section.

Section 5- Documentation required for ALL institutions operating under the authority of the Bureau for Private Postsecondary Education (BPPE):

The application included a copy of a Bureau for Private and Postsecondary Education (BPPE) Approved Program List, printed April 28, 2014, and letters issued by the BPPE, demonstrating Ashford’s approval for distance education and on-site courses. The application requires submission of documentation, as issued by the BPPE.

Please submit a current Approved Program List, as issued by the BPPE.

Section 6- Advertising and other public statements, pursuant to 38 CFR §21.4252(h):

Please submit any copies of any new or subsequent advertising or other statements disseminated to the public in any manner by the institution or its representatives that concern, describe, or represent the institution and each educational program offered by the institution, since filing the initial application. If advertising is broadcasted by television or radio, include a copy of the script.
Section 7- Program identification:

CSAAVE is unable to determine the course modality or proposed course offerings planned for the San Diego campus. Information in the catalog and included in the application submission identify several programs approved by the BPPE and WASC for in state and out of state instruction. It is not clear if the proposed San Diego campus course modality will include online, resident, or a hybrid of instruction. CSAAVE will not grant approval of any practical training, externship, or internship courses under the provisions of 38 CFR §21.4265 offered outside California.

Please submit a list of programs for the proposed San Diego campus. Each proposed program must be identified in the new Ashford University San Diego catalog referenced in Section 2.2 above.

This concludes CSAAVE’s quantitative review of Ashford University’s application submission. Should Ashford desire to continue with the application for approval of its proposed San Diego campus, Ashford must implement all of the application changes, modifications, and corrections identified in this communication and demonstrate that it fully meets the standards for approval. Once Ashford provides verifiable documentation and information, CSAAVE can begin a qualitative review for approval determination.

Ashford must submit all required materials and documents in one single mailing to CSAAVE by June 30, 2016, for further consideration.

Documents must be submitted to CSAAVE at:

California Department of Veterans Affairs
California State Approving Agency for Veterans Education
1227 O Street, Suite 625
Sacramento, CA 95814

CSAAVE is committed to working with Ashford University representatives, in its effort to serve veterans and other Title 38 beneficiaries. If you have any questions or need further clarification, please feel free to contact me at (619)-372-9121.

Sincerely,

Shane R Ferreebe

Shane Ferreebe
Senior Education Specialist

CC: Vickie Schray, Bridgepoint Education Inc.
From: Schray, Vickie <Vickie.Schray@bpiedu.com>

Sent: Tuesday, June 14, 2016 4:51 PM

To: Johnson, Latanaya@CalVet

Subject: left you a voice mail

Please feel free to call me if you have any questions or want to discuss. Cell is 858 776 9772

Vickie Schray
SENIOR VICE PRESIDENT
REGULATORY AFFAIRS & PUBLIC POLICY
1455 Pennsylvania Avenue NW, Suite 800
Washington, DC 20004

P. 202.349.9040
C. 858.776.9772
F. 858.225.0290

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INNOVATIVE SOLUTIONS THAT ADVANCE LEARNING®

Lisa Barry
EXECUTIVE ASSISTANT

P. 858.668.2596 x 11107
C. 858.774.3792
F. 877.228.9995

Bridgepoint Education
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Hi Latanaya -

Again, many thanks for meeting with us and your continuing responsiveness. I'm meeting with our team tomorrow to share the information you provided re: the process. The sample list of materials that would be requested as part of the site visit is helpful. Do you have anything re: the individuals that you would want to meet with?

Also, can you please elaborate on the following statement in your email? When we met last week you touched on this but I'm still not clear what you're looking for beyond our current approvals from each of the entities you reference.

On-site evaluations are conducted, only when an institution is deemed to have met all applicable state, federal, and accreditation standards and requirements.

I'm sure I'll have some more questions 😊 and hope that if you need anything or have any questions that you won't hesitate to reach out to me.

Have a great weekend.
Vickie

Vickie Schray
SENIOR VICE PRESIDENT
REGULATORY AFFAIRS & PUBLIC POLICY
1455 Pennsylvania Avenue NW, Suite 900
Washington, DC 20004
P. 202.349.9040
C. 858.776.9772
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P. 858.668.2986 x 11107
C. 858.774.3792
F. 877.228.9995

Bridgepoint Education
INNOVATIVE SOLUTIONS THAT ADVANCE LEARNING®
Hello Vickie,

CalVet appreciates the opportunity to have met representatives for Bridgepoint Education and Ashford University. It is my hope that we were responsive to all of your questions regarding CSAAVE’s approval process. As I explained during the meeting, CSAAVE will review Ashford’s application submission for compliance with applicable state, federal, and accreditation standards and requirements for approval in California.

I want to reiterate that CSAAVE does not have approval authority for activities conducted by Ashford outside of California’s border; as such, CSAAVE’s review will be based solely upon Ashford’s operating status at the proposed San Diego campus. Should additional information, documentation, or clarification be necessary during our review, CSAAVE will provide Ashford with a detailed letter of request.

Per your request, CSAAVE will copy you on all future letters and emails in response to Ashford’s application review. I have also attached a sample visit preparation notice. On-site evaluations are conducted, only when an institution is deemed to have met all applicable state, federal, and accreditation standards and requirements.

CSAAVE looks forward to working with Ashford, as we proceed through the approval process.

Latanaya Johnson,
Education Administrator | California Department of Veterans Affairs
California State Approving Agency for Veterans Education
916-503-8319 (Direct) | 916-653-1035 (Fax)
www.calvet.ca.gov

Like us on [Facebook] Follow us on [Twitter]

ALL INSTITUTIONS: Please include your facility code in the subject line of your email.
Hello Vickie,

CalVet appreciates the opportunity to have met representatives for Bridgepoint Education and Ashford University. It is my hope that we were responsive to all of your questions regarding CSAAVE’s approval process. As I explained during the meeting, CSAAVE will review Ashford’s application submission for compliance with applicable state, federal, and accreditation standards and requirements for approval in California.

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Latanaya Johnson,
Education Administrator | California Department of Veterans Affairs
California State Approving Agency for Veterans Education
916-503-8319 (Direct) | 916-653-1035 (Fax)
www.calvet.ca.gov

Like us on Facebook Follow us on Twitter

**ALL INSTITUTIONS:** Please include your facility code in the subject line of your email.
Site Visit materials for Approval for Veterans Training

Please have the following information available for review:

- Grade information (sample progress evaluations, transcripts, grade reports, etc.)
- Sample attendance record
- Files for all currently enrolled students
- Current business license (city/county)
- Recent fire inspection clearance or occupancy permit
- Copies of local advertisements
- Administrative/Faculty personnel files (containing Certificates of Authorization for Service, if applicable)
- Sample refund calculations for withdrawn students
- Completion placement data for previous calendar year
- Copy of Certificate of Eligibility for all proposed veteran students
- Sample instructional materials (lesson plans, textbooks, visual aids, etc.)
- Sample prior credit evaluations for enrolling students (If you are just beginning this process, provide a sample educational history questionnaire and description of the process that will be implemented in order to comply with the VA standard for evaluating previous education and training.)
- Total number of current student enrollment

Please place the items in a private/quiet room, so that the reviewer is not interrupted during the review. In addition, be prepared to provide the representative with a brief tour of your institution (for evaluation of space, equipment, and instructional resources).
From: Peterson, David@CalVet
Sent: Friday, June 10, 2016 4:26 PM
To: Johnson, Latanaya@CalVet
Subject: RE: ashford

https://www.facebook.com/notes/ashford-university/veterans-benefits/119514316054

Like · Reply · Share

Write a comment

Andrew Zimm
any gaps in my grad. Should...
Like · Reply · Share

Ashford
great work
Like · Reply · Share

Tamara Nichols
an approval...
Like · Reply · Share

Ashford University obtaining
Like · Reply · Share

Josh Robin
Taking ) and if can be approv...
Like · Reply · Share

Ashford
Ashford of obtaini...
Like · Reply · Share

Ava Red
we will still be a whole mont...
Like · Reply · Share

Ashford
From: Johnson, Latanaya@CalVet
Sent: Friday, June 10, 2016 4:21 PM
To: Peterson, David@CalVet
Subject: RE: ashford

Ashford University, San Diego or Bridgepoint Education

Latanaya Johnson,
Education Administrator | California Department of Veterans Affairs
California State Approving Agency for Veterans Education
916-503-8319 (Direct) | 916-653-1035 (Fax)

From: Peterson, Davld@CalVet
Sent: Friday, June 10, 2016 4:19 PM
To: Johnson, Latanaya@CalVet
Subject: ashford

A couple things come up when I put Ashford in what is their exact name of the school.
Dear Ashford st

It has come to o from the Vetera education at Asl you understand

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First and forem experience no d U.S. Departmen State Approving

Your advisor wi students will re askin confir.
From: Johnson, Latanaya@CalVet  
Sent: Friday, June 10, 2016 4:21 PM  
To: Peterson, David@CalVet  
Subject: RE: ashford

Ashford University, San Diego or Bridgepoint Education

Latanaya Johnson,  
Education Administrator | California Department of Veterans Affairs  
California State Approving Agency for Veterans Education  
916-503-8319 (Direct) | 916-653-1035 (Fax)

From: Peterson, David@CalVet  
Sent: Friday, June 10, 2016 4:19 PM  
To: Johnson, Latanaya@CalVet  
Subject: ashford

A couple things come up when I put Ashford in what is their exact name of the school.
From: Schray, Vickie <Vickie.Schray@bpiedu.com>
Sent: Friday, June 10, 2016 10:28 AM
To: Boylan, Keith@CalVet; Johnson, Latanaya@CalVet; Irby, Todd@CalVet
Cc: Marcey Brightwell (marcey@brightwellstrategies.com); Kathleen Van Osten (kvanosten@mvmstrategy.com); Marks, Michael W., VBAMUSK (michael.marks1@va.gov); brandon.hawkins@va.gov
Subject: Thank you and next steps

Keith, Latanaya, and Todd

Many thanks for taking the time to meet with us yesterday and your responsiveness to our request for approval in California. We also appreciated your willingness to engage in a candid discussion.

You expressed your opinion that the message sent from the VA to veteran students was not clear enough with respect to their options. Specifically, you are concerned that the term “may” was used in reference to the possibility that their benefits “may be interrupted” and would like to see communications that include the option for students to go elsewhere to complete their education. As we discussed, Curtis Coy in his email included the following statement and link: “To help you consider your alternatives, our GI Bill Comparison Tool can assist you; you can take a look at it here and search for other programs to attend.”

We are hopeful given the on-going dialogue with all three agencies (CA, IA, VA) and our shared commitment to protect our veteran students that we will reach a resolution that prevents any disruption in their educational benefits. We have been very transparent with our students and have communicated with them the possibility that they “may” experience a disruption of benefits. As I shared with you, it’s not always an option to go elsewhere especially for students that are nearing completion of their program. As promised, here is a link to the message that was sent to our students https://m.facebook.com/notes/ashford-university/veterans-benefits/1195143160504859

We very much appreciate how responsive Latanaya has been and appreciate your recognition that we too are responding to all requests. As we discussed, please add me to all communication from CSAAVE to Ashford along with Stephanie Stewart.

As there was much discussion re: the process and criteria for approval I’ve attempted to summarize the highlights to ensure that I accurately captured the information. Please let me know if you have any additions/corrections to ensure that I’m on the same page.

Process for Approval

*The application has been deemed complete and has been assigned to Shane for review.

*CSAAVE must approve Ashford as an institution; then, each program must also be approved independently. There will be a comprehensive review, and questions or concerns will be provided to Ashford in a single letter. There are no guarantee that all of our programs that are currently approved by IASAA, WSCUC, BPPE and the US Department of Education will be approved by CSAAVE.

*The approval is based upon the current catalogue provided to students, which is why you requested a catalogue for 2016/17. Otherwise, approval would expire June 30, 2016.
Once the above-mentioned letter is sent, and CSAAVE receive satisfactory responses to your inquiries, and the application is deemed “complete,” CSAAVE will provide their preliminary findings, and schedule a site visit that will last approximately eight hours.

With respect to what the site visit will look at and request, Latanaya suggested they will look at much of the same type of materials that WASC or BPPE might request during a site visit (e.g., student files, walk through enrollment process, interview key staff). Latanaya offered to email me a copy of the protocol or check-list used for a site visit.

An exit interview will be conducted at the end of the site visit. Within a day or two, they will initiate a final letter of approval, which will then be forwarded to the federal V.A. along with Ashford’s application. The decision to approve Ashford is internal only and will be based on Ashford’s ability to meet the criteria. There will be no consultation with outside agencies.

CSAAVE will look at and approve only those functions conducted by Ashford in California. Certifying officials and relative staff must be located in California, or they will not be approved by, irrespective of federal regulations that might provide for multi-state presence of operations. California will not approve any operations located outside of California. For Ashford to receive approval all Title 38 functions all relevant staff must be moved to California.

CalVet indicated that other agencies/entities are very interested in Ashford’s operations and that we should strive to get approval immediately to avoid additional challenges by other entities.

CSAAVE stressed this application is a very high priority for them and they are committed to work closely with us to obtain approval as soon as possible but could not promise June 30 as the process normally takes between 60 and 90 days -- but would do their best.

Again, many thanks for your willingness and efforts to expedite the review and approval process. We will continue to be available and responsive to anything you may need to accomplish this important task.

All the best,
Vickie

Vickie Schray
SENIOR VICE PRESIDENT
REGULATORY AFFAIRS & PUBLIC POLICY
1435 Pennsylvania Avenue NW, Suite 800
Washington, DC 20004
P. 202.349.9040
C. 858.776.9772
F. 858.225.0290

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P. 858.668.2586 x 11107
C. 858.774.3752
F. 877.228.9995

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Ms. Stewart,

This is to confirm receipt of Ashford University's 2016-2017 catalog and all additional information and documentation identified in CSAAVE’s letter of June 1, 2016. The Application for Approval of Accredited Proprietary Institutions for Ashford University, San Diego, is deemed complete for review and processing. CSAAVE can now proceed with the comprehensive review, in order to make an approval determination.

Ashford's application identifies you as the point of contact; therefore, all future communication regarding the application process will be directed to your attention. Ashford’s application review has been assigned to Mr. Shane Ferreebee, Senior Education Specialist, who will contact you directly should additional information, documentation, or clarification be necessary. Should you need to contact Mr. Ferreebee, please direct communication to him at Shane.Ferreebee@calvet.ca.gov or (619) 372-9121.

Every effort will be made by CSAAVE to expeditiously review the application and all supporting information and documentation. CSAAVE appreciates Ashford’s responsiveness thus far and we look forward to working with you through the remainder of this process. Thank you.

Latanaya Johnson,
Education Administrator | California Department of Veterans Affairs
California State Approving Agency for Veterans Education
916-503-8319 (Direct) | 916-653-1035 (Fax)
Johnson, Latanaya@CalVet

From: Schray, Vickie <Vickie.Schray@bpi.edu.com>
Sent: Monday, June 06, 2016 12:13 PM
To: Johnson, Latanaya@CalVet; Boylan, Keith@CalVet; Kathlee Van Osten; Hernandez, Sarah@CalVet
Subject: Ashford University 2016-17 Catalogue
Attachments: 2016-2017 Ashford University Catalog.pdf; CSAAVE Updated Pages of Application 6-6-16.pdf

Here you go. See you on Thursday. Vickie

Hi Latanaya – Thanks so much! BTW, I will be emailing you a PDF copy of the 2016-17 catalogue this afternoon and sending via fedex the required 3 hard copies. Looking forward to meeting you all in person. Take care. Vickie

-----Original Appointment-----
From: Johnson, Latanaya@CalVet [mailto:Latanaya.Johnson@calvet.ca.gov]
Sent: Monday, June 6, 2016 3:00 PM
To: Schray, Vickie; Boylan, Keith@CalVet; Kathlee Van Osten; Hernandez, Sarah@CalVet
Subject: RE: Ashford University

When: Thursday, June 9, 2016 10:00 AM-11:00 AM (UTC-08:00) Pacific Time (US & Canada).
Where: CalVet HQ - Sacramento

Hello Vickie,

CalVet is located at 1227 O Street, Sacramento, CA, which is at the corner of 13th and O Streets. We have available parking, directly in front of the building. Upon arrival, check in with security and you will be provided a parking pass for your vehicle. Please have security contact Ms. Sarah Hernandez (651-3048), who will direct you to Keith’s office.

I’ve also included Kathy on this email, just in case she’s available and would like to participate in the meeting.

We look forward to meeting with you.

Latanaya
INITIAL APPLICATION FOR APPROVAL OF ACCREDITED PROPRIETARY INSTITUTIONS
Title 38, U. S. Code 3671 (a) and 3672(a)

The California State Approving Agency for Veterans Education (CSAAVE), a division of the California Department of Veterans Affairs (CalVet) is responsible for the approval of courses/programs pursuant to requirements defined in the US Code of Federal Regulations (CFR), Title 38. Accredited courses are those recognized by a nationally recognized accrediting agency or association. The State approving agencies may use the accreditation of these accrediting agencies or associations for approval of the course specifically accredited and approved by the agency or association. Accreditation does not guarantee approval. CSAAVE will not issue a grant of approval under 38 CFR 21.4253, when the evidence of record demonstrates that an institution and/or its courses fail to fully comply with accrediting agency standards.

INSTRUCTIONS

The submission of an application is strictly voluntary. By submitting an application, the institution agrees to comply with all applicable federal and state statutory requirements for Title 38 approval. Failure to properly administer the program may result in an adverse administration action.

The application must be signed and include attachments, where applicable. Each section of the application must be completed with accurate and current information. A complete application for approval must include one (1) original and two (2) copies of all forms, addendums, attachments, and/or Catalog or VIB and be mailed to:

California State Approving Agency for Veterans Education (CSAAVE)
1227 O Street, Suite 625
Sacramento, CA 95814

Applications that fail to include all required documentation are deemed incomplete and will delay the review process and may be returned or denied approval.

Questions regarding the application, forms, or the approval process should be directed to CSAAVE at CSAAVEInfo@calvet.ca.gov. Please include your facility code in the subject line of email correspondence. You may also contact CSAAVE by calling (916) 503-8317.
Include copies of current advertising and other statements disseminated to the public in any manner by the institution or its representatives that concern, describe, or represent the institution and each educational program offered by the institution. If advertising is broadcasted by television or radio, include a copy of the script.

Section 7- Visits by Agency Representatives and Availability of Records:

After your application is deemed complete, but before CSAAVE issues approval and the U.S. Department of Veterans Affairs (DVA) accepts the approval, a CSAAVE Education Specialist will conduct an inspection visit to the institution to evaluate your facility and ensure that students eligible to receive veteran education benefits will be served as required by the VA.

Following issuance of approval, and once veterans enroll in your programs, representatives from the DVA and CSAAVE will visit your school facility to conduct Compliance Surveys during normal working hours. Pursuant to 38 CFR 21.4209, school administrators must make available all records to DVA and CSAAVE staff pertaining to the school and its operation.

Compliance Surveys are conducted by the CSAAVE and the VA in order to ensure proper administration of the GI Bill by the school or training establishment. Compliance Surveys are designed to prevent and/or correct deficiencies or violations by:

- Verifying the accuracy of educational benefit payments to eligible individuals
- Ensuring school officials understand the VA requirements and their responsibilities
- Assuring proper action is promptly taken to correct discrepancies, which may include discontinuance of benefits

Section 8- Program identification (Complete Tables 1-3):

Institutions must report programs in the appropriate tables located below.

If there are no programs to report on a table, please indicate "N/A".

TABLE 1- Degree programs submitted for approval (Pursuant to 38 CFR 21.7020(13), an educational objective is one that leads to the awarding of a diploma, degree or certificate which reflects educational attainment).

<table>
<thead>
<tr>
<th>Program</th>
<th>Page</th>
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<tbody>
<tr>
<td>Bachelor of Arts in Accounting</td>
<td>130</td>
</tr>
<tr>
<td>Bachelor of Arts in Business Administration</td>
<td>131</td>
</tr>
<tr>
<td>Bachelor of Arts in Business Economics</td>
<td>132</td>
</tr>
<tr>
<td>Bachelor of Arts in Business Information Systems</td>
<td>132</td>
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<tr>
<td>Bachelor of Arts in Business Leadership</td>
<td>133</td>
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<tr>
<td>Bachelor of Arts in Consumer and Family Financial Services</td>
<td>134</td>
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<tr>
<td>Bachelor of Arts in eMarketing</td>
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<tr>
<td>Bachelor of Arts in Entrepreneurship</td>
<td>136</td>
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<tr>
<td>Bachelor of Arts in Finance</td>
<td>137</td>
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<tr>
<td>Bachelor of Arts in Human Resources Management</td>
<td>138</td>
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<tr>
<td>Bachelor of Arts in International Business</td>
<td>139</td>
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<tr>
<td>Bachelor of Arts in Operations Management and Analysis</td>
<td>139</td>
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</tbody>
</table>

(list continues on supplemental page)
TABLE 2- Non-College Degree (NCD) programs (Pursuant to 38 CFR 21.4270(b)(22)) submitted for approval (*Refer to Section 3)

<table>
<thead>
<tr>
<th>Program</th>
<th>Page</th>
<th># of Clock / Credit Hours</th>
<th>Post-Baccalaureate Certificate Y/N</th>
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<tbody>
<tr>
<td>None</td>
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TABLE 3- Programs that are not submitted for approval.

<table>
<thead>
<tr>
<th>Degree, Diploma, or Certificate</th>
<th>Program</th>
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<tbody>
<tr>
<td>None</td>
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38AP-04-16.08

Page 7 of 8

ASH1782
CALIFORNIA DEPARTMENT OF VETERANS AFFAIRS,
CALIFORNIA STATE APPROVING AGENCY
FOR VETERANS EDUCATION (CSAAVE)
CATALOG APPROVAL CRITERIA FORM

PROPRIETARY ACCREDITED INSTITUTIONS
UNDER TITLE 38 VETERAN'S PROGRAM, U.S. CODE

Institution name: Ashford University

Instructions: Please indicate the page number(s) where these items/policies are found in the catalog. If the catalog does not contain a required item/policy, please include an addendum or separate veterans' information bulletin to comply with federal regulations. Complete and return with the application for approval.

<table>
<thead>
<tr>
<th>Page Number(s)</th>
<th>GENERAL</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Name of institution</td>
</tr>
<tr>
<td>2</td>
<td>Institutional address and telephone number, administrative address (if applicable)</td>
</tr>
<tr>
<td>3</td>
<td>Effective date of catalog</td>
</tr>
<tr>
<td>4</td>
<td>Listing of governing body, officials and faculty and their qualifications</td>
</tr>
<tr>
<td>5</td>
<td>Description of facility</td>
</tr>
<tr>
<td>6</td>
<td>Calendar (showing legal holidays, beginning and ending dates of each term)</td>
</tr>
<tr>
<td>7</td>
<td>Schedule of fees (tuition, books, equipment, lab fees, etc.)</td>
</tr>
</tbody>
</table>

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<thead>
<tr>
<th>8</th>
<th>Policies</th>
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</thead>
<tbody>
<tr>
<td>103-113, 197-201</td>
<td>Enrollment/admissions policy, including specific entrance requirements for each course</td>
</tr>
<tr>
<td>121-125, 203</td>
<td>Policy for evaluation of credit for previous education and training. The policy should specify that the institution will maintain a written record of the previous education and training of veterans and eligible persons, that the record will clearly indicate that credit has been granted, if appropriate, with the training period shortened proportionately and the student notified accordingly, per 21.4253 (d)(3)</td>
</tr>
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<thead>
<tr>
<th>10</th>
<th>Attendance Policy:</th>
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</thead>
<tbody>
<tr>
<td>117, 204</td>
<td>Leave of absence</td>
</tr>
<tr>
<td>117, 204</td>
<td>Tardiness</td>
</tr>
<tr>
<td>116, 203</td>
<td>Interruption for unsatisfactory attendance/unexcused absences</td>
</tr>
<tr>
<td>116, 203</td>
<td>Class cuts</td>
</tr>
<tr>
<td>93</td>
<td>Make-up work</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>15</th>
<th>Satisfactory Progress Policy:</th>
</tr>
</thead>
<tbody>
<tr>
<td>92-93</td>
<td>School's grading system for each class</td>
</tr>
<tr>
<td>119, 206</td>
<td>Grade average required to remain in school/required grade point average (GPA) to graduate</td>
</tr>
<tr>
<td>119-121, 207-08</td>
<td>Conditions for interruption for unsatisfactory progress/dismissal policy and description of a probationary period, if any. (Note: The progress policy must be specific enough to determine the point in time when VA educational benefits will be discontinued when the veteran or eligible person ceases to make satisfactory progress. It should specify that no more than two terms, quarters or semesters on probation will be permitted.)</td>
</tr>
<tr>
<td>121. 208</td>
<td>18.</td>
</tr>
<tr>
<td>25-31</td>
<td>19.</td>
</tr>
</tbody>
</table>

**Tuition Refund Policy:**

| 73-80 | 20. | Pro-rata refund policy (consistent with Bureau and accrediting association guidelines) |

**EDUCATIONAL/VOCATIONAL OBJECTIVES**

| 130-186, 208-228 | 21. | Educational objectives (degree programs) |
| N/A | 22. | Vocational objectives (certificate programs) |

Note: For each certificate submitted for approval, the catalog should include the occupational objective, a course outline detailing subjects or units in the course and/or skills to be learned, and total course length.

| 256 | 23. | *Practical training/externships/internships (requires signed certification form) |
| N/A | 24. | *Television courses |
| N/A | 25. | *Teacher certification programs |
| N/A | 26. | *Refresher and remedial courses |
| N/A | 27. | *Studying abroad courses |
| N/A | 28. | *Independent study/directed studies including on-line, self-paced courses |
| N/A | 29. | *Combination programs/ dual majors) |
| N/A | 30. | *Nursing field work (requires signed certification form) |
| N/A | 31. | *Professional internship/clinical pastoral |
| N/A | 32. | *Clinical training required for medical or dental specialty courses (requires signed certification form) |
| N/A | 33. | Branches without administrative capability (requires signed certification form) |
| N/A | 34. | Programs offered under contract (requires signed certification form) |

*Not applicable for deemed approved programs*
### TABLE 1 (Continued from page 6) - Degree programs submitted for approval (Pursuant to 38 CFR 21.7020(13), an educational objective is one that leads to the awarding of a diploma, degree or certificate which reflects educational attainment).

<table>
<thead>
<tr>
<th>Program</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bachelor of Arts in Organizational Management</td>
<td>140</td>
</tr>
<tr>
<td>Bachelor of Arts in Project Management</td>
<td>141</td>
</tr>
<tr>
<td>Bachelor of Arts in Public Administration</td>
<td>142</td>
</tr>
<tr>
<td>Bachelor of Arts in Public Relations and Marketing</td>
<td>143</td>
</tr>
<tr>
<td>Bachelor of Arts in Real Estate Studies</td>
<td>144</td>
</tr>
<tr>
<td>Bachelor of Arts in Service Management</td>
<td>145</td>
</tr>
<tr>
<td>Bachelor of Arts in Sports and Recreation Management</td>
<td>146</td>
</tr>
<tr>
<td>Bachelor of Arts in Supply Chain Management</td>
<td>147</td>
</tr>
<tr>
<td>Associate of Arts in Early Childhood Education</td>
<td>148</td>
</tr>
<tr>
<td>Bachelor of Arts in Child Development</td>
<td>150</td>
</tr>
<tr>
<td>Bachelor of Arts in Cognitive Studies</td>
<td>151</td>
</tr>
<tr>
<td>Bachelor of Arts in Early Childhood Education</td>
<td>152</td>
</tr>
<tr>
<td>Bachelor of Arts in Early Childhood Education Administration</td>
<td>154</td>
</tr>
<tr>
<td>Bachelor of Arts in Education Studies</td>
<td>155</td>
</tr>
<tr>
<td>Bachelor of Arts in English Language Learner Studies</td>
<td>157</td>
</tr>
<tr>
<td>Bachelor of Arts in Instructional Design</td>
<td>158</td>
</tr>
<tr>
<td>Bachelor of Arts in Library Science and Media</td>
<td>160</td>
</tr>
<tr>
<td>Bachelor of Arts in Applied Behavioral Science</td>
<td>161</td>
</tr>
<tr>
<td>Bachelor of Arts in Complementary and Alternative Health</td>
<td>162</td>
</tr>
<tr>
<td>Bachelor of Arts in Gerontology</td>
<td>163</td>
</tr>
<tr>
<td>Bachelor of Arts in Health and Human Services</td>
<td>163</td>
</tr>
<tr>
<td>Bachelor of Arts in Health and Wellness</td>
<td>164</td>
</tr>
<tr>
<td>Bachelor of Arts in Health Care Administration</td>
<td>165</td>
</tr>
<tr>
<td>Bachelor of Arts in Health Education</td>
<td>166</td>
</tr>
<tr>
<td>Bachelor of Arts in Psychology</td>
<td>167</td>
</tr>
<tr>
<td>Bachelor of Science in Health Information Management</td>
<td>168</td>
</tr>
<tr>
<td>Bachelor of Science in Nursing</td>
<td>170</td>
</tr>
<tr>
<td>Associate of Arts in Military Studies</td>
<td>171</td>
</tr>
<tr>
<td>Bachelor of Arts in Applied Linguistics</td>
<td>172</td>
</tr>
<tr>
<td>Bachelor of Arts in Communication Studies</td>
<td>173</td>
</tr>
<tr>
<td>Bachelor of Arts in Cultural Anthropology</td>
<td>174</td>
</tr>
<tr>
<td>Bachelor of Arts in English</td>
<td>176</td>
</tr>
<tr>
<td>Bachelor of Arts in Environmental Studies</td>
<td>176</td>
</tr>
<tr>
<td>Bachelor of Arts in History</td>
<td>177</td>
</tr>
<tr>
<td>Bachelor of Arts in Homeland Security and Emergency Management</td>
<td>178</td>
</tr>
<tr>
<td>Bachelor of Arts in Journalism and Mass Communication</td>
<td>179</td>
</tr>
<tr>
<td>Bachelor of Arts in Law Enforcement Administration</td>
<td>180</td>
</tr>
<tr>
<td>Bachelor of Arts in Liberal Arts</td>
<td>181</td>
</tr>
<tr>
<td>Bachelor of Arts in Military Studies</td>
<td>182</td>
</tr>
<tr>
<td>Bachelor of Arts in Political Science and Government</td>
<td>182</td>
</tr>
<tr>
<td>Bachelor of Arts in Social and Criminal Justice</td>
<td>183</td>
</tr>
<tr>
<td>Bachelor of Arts in Social Science</td>
<td>184</td>
</tr>
<tr>
<td>Bachelor of Arts in Sociology</td>
<td>185</td>
</tr>
<tr>
<td>Associate of Arts in Business</td>
<td>186</td>
</tr>
<tr>
<td>Program</td>
<td>Notes</td>
</tr>
<tr>
<td>----------------------------------------------</td>
<td>--------</td>
</tr>
<tr>
<td>Associate of Arts in Organizational Management</td>
<td>N/A</td>
</tr>
<tr>
<td>Bachelor of Arts in Adult Development</td>
<td>N/A</td>
</tr>
<tr>
<td>Bachelor of Arts in Education and Public Policy</td>
<td>N/A</td>
</tr>
<tr>
<td>Bachelor of Arts in Health Care Studies</td>
<td>N/A</td>
</tr>
<tr>
<td>Bachelor of Arts in Health Informatics</td>
<td>N/A</td>
</tr>
<tr>
<td>Bachelor of Arts in Health Marketing and Communication</td>
<td>N/A</td>
</tr>
<tr>
<td>Bachelor of Arts in Sustainable Enterprise Management</td>
<td>N/A</td>
</tr>
<tr>
<td>Master of Accountancy</td>
<td>208</td>
</tr>
<tr>
<td>Master of Arts in Organizational Management</td>
<td>210</td>
</tr>
<tr>
<td>Master of Business Administration</td>
<td>211</td>
</tr>
<tr>
<td>Master of Public Administration</td>
<td>213</td>
</tr>
<tr>
<td>Master of Arts in Education</td>
<td>214</td>
</tr>
<tr>
<td>Master of Arts in Special Education</td>
<td>221</td>
</tr>
<tr>
<td>Master of Arts in Teaching and Learning with Technology</td>
<td>223</td>
</tr>
<tr>
<td>Master of Arts in Health Care Administration</td>
<td>224</td>
</tr>
<tr>
<td>Master of Arts in Psychology</td>
<td>225</td>
</tr>
<tr>
<td>Master of Science in Criminal Justice</td>
<td>226</td>
</tr>
</tbody>
</table>

**EXPLANATORY NOTE TO TABLE 1 OF SECTION 8 (PROGRAM IDENTIFICATION) OF ASHFORD UNIVERSITY’S INITIAL APPLICATION**

Ashford University has ceased new enrollments in the following programs and, as a result, does not reference them in its current catalog (and has noted these programs in the table as N/A):

1. Associate of Arts in Business
2. Associate of Arts in Organizational Management
3. Bachelor of Arts in Adult Development
4. Bachelor of Arts in Education and Public Policy
5. Bachelor of Arts in Health Care Studies
6. Bachelor of Arts in Health Informatics
7. Bachelor of Arts in Health Marketing and Communication
8. Bachelor of Arts in Sustainable Enterprise Management

Ashford University seeks CSAAVE approval for the foregoing degree programs to permit withdrawn students the opportunity to return to Ashford University to complete their educational programs. The institution will not certify new students for these programs, only returning students.

Published versions of these programs are available in prior academic year catalogs.
TRUE AND CORRECT STATEMENT FOR SCHOOL CATALOG/BULLETIN

Instructions: Complete the statement and attach to each copy of the catalog or bulletin. Original signature required.

<table>
<thead>
<tr>
<th>Institution name: Ashford University</th>
<th>Facility Code: 21000415</th>
</tr>
</thead>
<tbody>
<tr>
<td>Name changed? Yes  No  If yes, previous name:</td>
<td></td>
</tr>
<tr>
<td>Accredited? Yes  No</td>
<td></td>
</tr>
<tr>
<td>Physical address: 8620 Spectrum Center Boulevard</td>
<td>Mailing address, if different:</td>
</tr>
<tr>
<td>San Diego, CA 92123-1406</td>
<td></td>
</tr>
<tr>
<td>Address changed? Yes  No</td>
<td></td>
</tr>
<tr>
<td>If yes, prior address:</td>
<td>Effective date of change:</td>
</tr>
<tr>
<td></td>
<td>07 / 01 / 2016</td>
</tr>
<tr>
<td>Catalog/Bulletin Effective Month, Day, and Year:</td>
<td>06 / 30 / 2017</td>
</tr>
</tbody>
</table>

THIS IS TO CERTIFY THAT THE ATTACHED SCHOOL CATALOG OR BULLETIN IS TRUE AND EXACT IN CONTENT AND POLICY, IN ACCORDANCE WITH THE REQUIREMENTS OF THE CODE OF FEDERAL REGULATIONS SECTION 21.4253(d)(1) and SECTION 21.4254(b). ALL ATTACHED MATERIALS AND DOCUMENTS ARE TRUE AND EXACT COPIES OF THE DOCUMENTS ISSUED BY THE EXTERNAL AGENCY OR ENTITY. WE UNDERSTAND THAT DOCUMENTS OR STATEMENTS FOUND TO BE FALSE, FICTITIOUS, FRAUDULENT, MISLEADING OR MISREPRESENTING THE INSTITUTION, ITS PROGRAMS AND/OR OWNERSHIP FOR THE PURPOSE OF OBTAINING A GRANT OF CSAAVE APPROVAL WILL RESULT IN THE IMMEDIATE SUSPENSION, WITHDRAWAL OR DENIAL OF APPROVAL.

Signature of authorized representative: [Signature]

Date: 6/6/2015

Print name and title of authorized representative: Craig D. Swenson, President and CEO

Email address and Telephone Number: craig.swenson@ashford.edu  800-674-6700

Mail to:
DEPARTMENT OF VETERANS AFFAIRS
CALIFORNIA STATE APPROVING AGENCY FOR VETERANS EDUCATION
1227 O Street, Suite 625
Sacramento, CA 95814

38PRM-04-15.02

ASH1787
# PRACTICAL TRAINING/EXTERNSHIP/INTERNSHIP COURSES
UNDER THE PROVISIONS OF 38 CODE OF FEDERAL REGULATIONS 21.4265

<table>
<thead>
<tr>
<th>School Name:</th>
<th>Ashford University</th>
</tr>
</thead>
<tbody>
<tr>
<td>School Address:</td>
<td>8620 Spectrum Center Boulevard, San Diego, CA 92123</td>
</tr>
<tr>
<td>Accreditation Agency:</td>
<td>WASC Senior College and University Commission (WSCUC)</td>
</tr>
</tbody>
</table>

☑️ By checking this box we certify that all Practical Training/Externship/Internship courses meet the specific conditions of each category and are conducted within the State of California exclusively.* We request that the following list of Practical Training/Externship/Internship courses be approved under the provisions of 38 CFR §21.4265. Attach additional pages if necessary. DO NOT REPORT PRACTICAL TRAINING COURSES FOR DEEMED APPROVED PROGRAMS.

<table>
<thead>
<tr>
<th>Category (see Page 2)</th>
<th>Course Number</th>
<th>Title</th>
<th>Catalog Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>D</td>
<td>HIM 495</td>
<td>Professional Practice Experience II</td>
<td>256</td>
</tr>
</tbody>
</table>

* Courses considered for approval by CSAAVE must be offered in California.

Craig D. Swenson, President and CEO

Name/Title

Signature

Date

craig.swenson@ashford.edu

Email Address

ASH1788
Hi Latanaya – Thanks so much! BTW, I will be emailing you a PDF copy of the 2016-17 catalogue this afternoon and sending via fedex the required 3 hard copies. Looking forward to meeting you all in person. Take care. Vickie

-----Original Appointment-----

From: Johnson, Latanaya@CalVet [mailto:Latanaya.Johnson@calvet.ca.gov]
Sent: Monday, June 6, 2016 1:32 PM
To: Schray, Vickie; Boylan, Keith@CalVet; Kathlee Van Osten; Hernandez, Sarah@CalVet
Subject: Ashford University
When: Thursday, June 9, 2016 10:00 AM-11:00 AM (UTC-08:00) Pacific Time (US & Canada).
Where: CalVet HQ - Sacramento

Hello Vickie,

CalVet is located at 1227 O Street, Sacramento, CA, which is at the corner of 13th and O Streets. We have available parking, directly in front of the building. Upon arrival, check in with security and you will be provided a parking pass for your vehicle. Please have security contact Ms. Sarah Hernandez (651-3048), who will direct you to Keith’s office.

I’ve also included Kathy on this email, just in case she’s available and would like to participate in the meeting.

We look forward to meeting with you.

Latanaya
Latanaya —

Thank you for the note and the invitation. Yes, I will plan to attend — and am currently working to confirm the meeting time with Ashford.

KVO

Kathleen Van Osten
MVM Strategy Group
kvanosten@mvmstrategy.com
Office: 916-444-3108
Cell: 916-605-9293

> On Jun 6, 2016, at 10:32 AM, Johnson, Latanaya@CalVet <Latanaya.Johnson@calvet.ca.gov> wrote:
> 
> <Mail Attachment.ics>
Good Morning Latanaya,

Our team has worked through the weekend to complete the 2016-17 catalogue one month ahead of schedule. I will forward it to you later today with the required certifications. While references to the Iowa campus have been changed, it is important to note that we still have a physical presence in Clinton, IA as a requirement of our teach-out plan and as such you will still see information related to Iowa in the catalogue.

I look forward to meeting with you later this week. As I mentioned, I will be in Sacramento and available to meet with you and Keith anytime Wednesday – Thursday. Please let me know a time that is convenient for you both.

All the best,
Vickie

Vickie Schray
SENIOR VICE PRESIDENT
REGULATORY AFFAIRS & PUBLIC POLICY
1435 Pennsylavenia Avenue NW, Suite 800
Washington, DC 20004
P. 202.349.9040
C. 858.776.9772
F. 858.225.0290

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Lisa Barry
EXECUTIVE ASSISTANT
P. 858.668.2586 x 11107
C. 858.774.3792
F. 877.228.9995

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Ashford's catalog must be a final/official publication meeting state, federal, and WASC standards and requirements. The catalog provides an overview of the proposed California school, its programs, instructional resources, faculty, and institutional policies, as presented to the public or student. The catalog also serves as a starting point for review and determination of compliance with applicable standards for CSAAVE’s approval determination. Ashford must also certify the catalog as true and exact in content and policy, in accordance with applicable law.

As far as the possibility to meet, I will follow up with you on Monday to confirm a day and time when Keith and I can meet.

Have a great weekend.

Latanaya Johnson,
Education Administrator | California Department of Veterans Affairs
California State Approving Agency for Veterans Education
916-503-8319 (Direct) | 916-653-1035 (Fax)

---

**From:** Schray, Vickie [mailto:Vickie.Schray@bpiedu.com]
**Sent:** Friday, June 03, 2016 11:24 AM
**To:** Johnson, Latanaya@CalVet
**Cc:** Stewart, Stephanie; brandon.hawkins@va.gov; Marks, Michael W., VBAMUSK (michael.marks1@va.gov); Boylan, Keith@CalVet
**Subject:** RE: Ashford University Response & Documents

Hi Latanaya,

As you are aware, the catalogue we submitted to you is effective from July 1, 2015 – June 30, 2016. When you mentioned in your email below to submit a “proposed catalogue” are you willing to accept a draft catalogue until such time our new catalogue is ready for release? Please advise and we will be happy to provide it to you to help expedite your review and approval.

Is it possible to confirm a day/time for us to meet in person next week? I plan to be in Sacramento Wednesday afternoon – Thursday and would appreciate the opportunity to sit down with you and Keith. I understand from Kathy that she had submitted a meeting request to you both but would like to get something on the calendar if at all possible.

I look forward to hearing from you.

Vickie

---

Vickie Schray
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REGULATORY AFFAIRS & PUBLIC POLICY
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F. 877.228.9995

Bridgepoint Education
INNOVATIVE SOLUTIONS THAT ADVANCE LEARNING®
From: Johnson, Latanaya@CalVet [mailto:Latanaya.Johnson@calvet.ca.gov]
Sent: Thursday, June 2, 2016 7:29 PM
To: Schray, Vickie
Cc: Stewart, Stephanie; brandon.hawkins@va.gov; Marks, Michael W., VBAMUSK (michael.marks1@va.gov); Boylan, Keith@CalVet
Subject: RE: Ashford University Response & Documents

Hello Vickie,

Thank you for Ashford's responsiveness to CSAAVE's request for additional documentation/information in support of the institution's application. However, there still remains the issue of Ashford's catalog expiration on June 30, 2016.

Ashford must provide CSAAVE with a new catalog, if Ashford wishes to be considered for approval beyond June 30, 2016. The catalog must fully comply with state and federal laws and specifically outline available services, programs, and resources for the proposed San Diego campus. In order to avoid confusion, all references to programs and services offered at the Clinton, IA campus should be removed.

Please submit three copies of the proposed catalog, along with a signed copy of the attached True and Correct Statement form. Once received, CSAAVE can proceed with the review and approval process.

Latanaya Johnson,
Education Administrator | California Department of Veterans Affairs
California State Approving Agency for Veterans Education
916-503-8319 (Direct) | 916-653-1035 (Fax)

From: Schray, Vickie [mailto:Vickie.Schray@bpiedu.com]
Sent: Thursday, June 02, 2016 12:09 PM
To: Johnson, Latanaya@CalVet
Cc: Stewart, Stephanie; brandon.hawkins@va.gov; Marks, Michael W., VBAMUSK (michael.marks1@va.gov); Boylan, Keith@CalVet
Subject: Ashford University Response & Documents

Good Afternoon Latanaya –

Attached please find electronic copies of the documents you requested in your June 1, 2016 email. The hard copies have been sent via fedex with delivery expected tomorrow. Please let me know if you have any questions.

Best regards,
Vickie

Vickie Schray
SENIOR VICE PRESIDENT
REGULATORY AFFAIRS & PUBLIC POLICY
1455 Pennsylvania Avenue NW, Suite 800
Washington, DC 20004
P. 202.349.9040
C. 858.776.5772
F. 858.225.0290

ASH1793
Hello Vickie,

Ashford’s catalog must be a final/official publication meeting state, federal, and WASC standards and requirements. The catalog provides an overview of the proposed California school, its programs, instructional resources, faculty, and institutional policies, as presented to the public or student. The catalog also serves as a starting point for review and determination of compliance with applicable standards for CSAAVE’s approval determination. Ashford must also certify the catalog as true and exact in content and policy, in accordance with applicable law.

As far as the possibility to meet, I will follow up with you on Monday to confirm a day and time when Keith and I can meet.

Have a great weekend.

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California State Approving Agency for Veterans Education
916-503-8319 (Direct) | 916-653-1035 (Fax)

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I look forward to hearing from you.
Vickie
From: Johnson, Latanaya@Cal Vet [mailto:Latanaya.Johnson@calvet.ca.gov]
Sent: Thursday, June 2, 2016 7:29 PM
To: Schray, Vickie
Cc: Stewart, Stephanie; brandon.hawkins@va.gov; Marks, Michael W., VBAMUSK (michael.marks1@va.gov); Boylan, Keith@Cal Vet
Subject: RE: Ashford University Response & Documents

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Latanaya Johnson,
Education Administrator | California Department of Veterans Affairs
California State Approving Agency for Veterans Education
916-503-8319 (Direct) | 916-653-1035 (Fax)

From: Schray, Vickie [mailto:Vickie.Schray@bpi.edu.com]
Sent: Thursday, June 02, 2016 12:09 PM
To: Johnson, Latanaya@Cal Vet
Cc: Stewart, Stephanie; brandon.hawkins@va.gov; Marks, Michael W., VBAMUSK (michael.marks1@va.gov); Boylan, Keith@Cal Vet
Subject: Ashford University Response & Documents

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Best regards,
Vickie

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Latanaya Johnson,
Education Administrator | California Department of Veterans Affairs
California State Approving Agency for Veterans Education
916-503-8319 (Direct) | 916-653-1035 (Fax)

From: Schray, Vickie [mailto:Vickie.Schray@bpiedu.com]
Sent: Thursday, June 02, 2016 12:09 PM
To: Johnson, Latanaya@CalVet
Cc: Stewart, Stephanie; brandon.hawkins@va.gov; Marks, Michael W., VBAMUSK (michael.marks1@va.gov); Boylan, Keith@CalVet
Subject: Ashford University Response & Documents

Good Afternoon Latanaya –

Attached please find electronic copies of the documents you requested in your June 1, 2016 email. The hard copies have been sent via fedex with delivery expected tomorrow. Please let me know if you have any questions.

Best regards,
Vickie

Vickie Schray
SENIOR VICE PRESIDENT
REGULATORY AFFAIRS & PUBLIC POLICY
1455 Pennsylvania Avenue NW, Suite 800
Washington, DC 20004
P. 202.349.9040
C. 858.776.9772
F. 858.225.0290

Bridgepoint Education
INNOVATIVE SOLUTIONS THAT ADVANCE LEARNING™

Lisa Barry
EXECUTIVE ASSISTANT
P. 858.668.2586 x 11107
C. 858.774.3792
F. 877.228.9995

Bridgepoint Education
INNOVATIVE SOLUTIONS THAT ADVANCE LEARNING™
Hello Vickie,

Thank you for Ashford’s responsiveness to CSAAVE’s request for additional documentation/information in support of the institution’s application. However, there still remains the issue of Ashford’s catalog expiration on June 30, 2016.

Ashford must provide CSAAVE with a new catalog, if Ashford wishes to be considered for approval beyond June 30, 2016. The catalog must fully comply with state and federal laws and specifically outline available services, programs, and resources for the proposed San Diego campus. In order to avoid confusion, all references to programs and services offered at the Clinton, IA campus should be removed.

Please submit three copies of the proposed catalog, along with a signed copy of the attached True and Correct Statement form. Once received, CSAAVE can proceed with the review and approval process.

Latanaya Johnson,
Education Administrator | California Department of Veterans Affairs
California State Approving Agency for Veterans Education
916-503-8319 (Direct) | 916-653-1035 (Fax)

---

From: Schray, Vickie [mailto:Vickie.Schray@bpi.edu]
Sent: Thursday, June 02, 2016 12:09 PM
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Vickie

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Bridgepoint Education
INNOVATIVE SOLUTIONS THAT ADVANCE LEARNING®
June 2, 2016

VIA EMAIL AND
FEDEX PRIORITY DELIVERY

Ms. Latanaya Johnson
Education Administrator
California State Approving Agency for Veterans Education
1227 O Street, Suite 625
Sacramento, CA 95814

Re: Ashford University -- Veterans Administration Facility Code 21000415

Dear Ms. Johnson:

I thank you for your letter dated June 1, 2016, requesting additional documents from Ashford University. In response to your request, I have enclosed an original and two copies of the following:

1. Verification of Non-Contracted Courses Form (signed);
2. Current Certificate of Status of the California Secretary of State dated May 26, 2016; and
3. Ashford's web link for the most recent School Performance Fact Sheets filed with BPPE.

For your convenience, although Ashford University will overnight these materials to you today, I have also attached convenience copies for you via email. The attached electronic version of the sheet of web links to our BPPE School Performance Fact Sheets will be especially useful to you as each hyperlink should bring you directly to the Fact Sheet relevant to the specific program. I note that we provided the Certificate of Status and BPPE weblinks with our application, but we understand that you only received the filing yesterday.

With reference to the Ashford University catalog, please note that the institution issues a single catalog for the Main Campus in San Diego, California and the Branch Campus in Clinton, Iowa. Accordingly, the three catalogs (and supplemental catalog materials) that we provided with our application encompass both campuses.

Finally, I have enclosed an original and two copies of a new VA Designation of Certifying Officials form. Please substitute this form for the form submitted with our original application yesterday.
Letter to Ms. Johnson
June 2, 2016
Page 2

I greatly appreciate your quick attention to this application. Should you have any questions or require any additional information, please contact Stephanie Stewart, Director, Financial Aid & Policy, at stephanie.stewart@ashford.edu.

Sincerely,

Craig Swenson
President and Chief Executive Officer

Attachment

cc: Vickie Schray
Senior Vice President for Regulatory Affairs & Public Policy
Bridgepoint Education Inc.
State of California
Secretary of State

CERTIFICATE OF STATUS

ENTITY NAME: ASHFORD UNIVERSITY, LLC

FILE NUMBER: 201334710047
FORMATION DATE: 12/13/2013
TYPE: DOMESTIC LIMITED LIABILITY COMPANY
JURISDICTION: CALIFORNIA
STATUS: ACTIVE (GOOD STANDING)

I, ALEX PADILLA, Secretary of State of the State of California, hereby certify:

The records of this office indicate the entity is authorized to exercise all of its powers, rights and privileges in the State of California.

No information is available from this office regarding the financial condition, business activities or practices of the entity.

IN WITNESS WHEREOF, I execute this certificate and affix the Great Seal of the State of California this day of May 25, 2016.

ALEX PADILLA
Secretary of State
Department of Veterans Affairs

DESIGNATION OF CERTIFYING OFFICIAL(S)

GENERAL INSTRUCTIONS
1. This form MUST ONLY be completed by a responsible official with the authority to designate certifying officials for the school or training establishment.
2. This form must be completed whenever there is a change in any of the information. Include the names, titles, and signatures of all certifying officials, not just the changed information.

SPECIFIC INSTRUCTIONS
1. Item 1: Enter the complete name and address of the school or training establishment.
2. Item 2: Enter the certifying official's telephone number.
3. Item 3: Enter the certifying official's fax number.
4. Item 4: Enter the certifying official's e-mail address. As an alternative, you may enter the e-mail address for the office where the certifying official works.
5. Item 5A: Enter the complete name and title for each designated certifying official. Have each person sign the form on the same line as his or her name and title. If any of the certifying officials have limited jurisdiction, note such limitations in Item 6, "Remarks". Use space below if needed.
6. Item 5B: If facsimile (e.g., rubber stamp) signatures will be used for any certifying officials, enter a sample in the appropriate block. In addition, have the individual initial next to the sample.
7. Item 5C: If veterans and other eligible persons will be claiming individualized tutorial assistance, complete these blocks.
8. Items 7 and 8: Sign and date the form. The person signing the form must be a person of significant authority, i.e., registrar, academic dean, or higher.

PURPOSE: This form is used to provide the names and signatures of those individuals who are authorized to certify enrollment information to the Department of Veterans Affairs.

1. NAME AND ADDRESS OF SCHOOL OR TRAINING ESTABLISHMENT (Include ZIP Code)
   Ashford University Online
   1310 19th Ave, NW
   Clinton, IA 52732-3910
   Fax Code 21000415

2. TELEPHONE NUMBER(S) OF CERTIFYING OFFICIAL(S) (Include Area Code)
   877.241.9893 ext. 20054

3. FAX NUMBER OF CERTIFYING OFFICIAL(S) (Include Area Code)
   866.512.1729

4. E-MAIL ADDRESS OF CERTIFYING OFFICIAL(S)
   Team Email: VACertification@ashford.edu
   Individual Email: (See below)

5. THE FOLLOWING ARE DESIGNATED AS CERTIFYING OFFICIALS OF THIS SCHOOL OR TRAINING ESTABLISHMENT

   A. OFFICIAL(S) DESIGNATED TO SIGN VA ENROLLMENT CERTIFICATIONS, CERTIFICATIONS OF CHANGE IN STUDENT STATUS, CERTIFICATIONS OF DELIVERY OF ADVANCE PAYMENTS, CERTIFICATIONS OF PURSUIT, ATTENDANCE, FLIGHT TRAINING, ON-THE-JOB OR APPRENTICESHIP TRAINING (AS APPLICABLE). OTHER CERTIFICATIONS OF ENROLLMENT ARE:

<table>
<thead>
<tr>
<th>NO.</th>
<th>NAME</th>
<th>TITLE</th>
<th>SIGNATURE</th>
</tr>
</thead>
<tbody>
<tr>
<td>(1)</td>
<td>Stephanie Stewart</td>
<td>Director of Financial Aid and Policy</td>
<td></td>
</tr>
<tr>
<td></td>
<td><a href="mailto:Stephanie.Stewart@ashford.edu">Stephanie.Stewart@ashford.edu</a></td>
<td></td>
<td></td>
</tr>
<tr>
<td>(2)</td>
<td>Conna Stanley</td>
<td>Director of Military Financial Services</td>
<td></td>
</tr>
<tr>
<td></td>
<td><a href="mailto:Conna.Stanley@ashford.edu">Conna.Stanley@ashford.edu</a></td>
<td></td>
<td></td>
</tr>
<tr>
<td>(3)</td>
<td>Jewel Odor</td>
<td>Financial Services Manager</td>
<td></td>
</tr>
<tr>
<td></td>
<td><a href="mailto:Jewel.Odor@ashford.edu">Jewel.Odor@ashford.edu</a></td>
<td></td>
<td></td>
</tr>
<tr>
<td>(4)</td>
<td>(See attached pages)</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

B. THE USE OF THE FOLLOWING FACSIMILE (E.G., RUBBER STAMP) SIGNATURES FOR THE OFFICIALS LISTED IN ITEM 5A ABOVE ARE AUTHORIZED.

   | (1) |                          |
   | (2) |                          |
   | (3) |                          |
   | (4) |                          |

VA FORM
MAY 2011 22-8794

EXISTING STOCKS OF VA FORM 22-8794, JAN 2007, WILL NOT BE USED.
### Department of Veterans Affairs

#### DESIGNATION OF CERTIFYING OFFICIAL(S)

**GENERAL INSTRUCTIONS**

1. This form MUST ONLY be completed by a responsible official with the authority to designate certifying officials for the school or training establishment.
2. This form must be completed whenever there is a change in any of the information. Include the names, titles, and signatures of all certifying officials, not just the changed information.

### SPECIFIC INSTRUCTIONS

1. **Item 1:** Enter the complete name and address of the school or training establishment.
2. **Item 2:** Enter the certifying official's telephone number.
3. **Item 3:** Enter the certifying official's fax number.
4. **Item 4:** Enter the certifying official's e-mail address. As an alternative, you may enter the e-mail address for the office where the certifying official works.
5. **Item 5A:** Enter the complete name and title for each designated certifying official. Have each person sign the form on the same line as his or her name and title. If any of the certifying officials have limited jurisdiction, note such limitations in Item 6, "Remarks". Use space below if needed.
6. **Item 5B:** If facsimile (e.g., rubber stamp) signatures will be used for any certifying officials, enter a sample in the appropriate block. In addition, have the individual initial next to the sample.
7. **Item 5C:** If veterans and other eligible persons will be claiming individualized financial assistance, complete these blocks.
8. **Items 7 and 8:** Sign and date the form. The person signing the form must be a person of significant authority, i.e., registrar, academic dean, or higher.

**PURPOSE:** This form is used to provide the names and signatures of those individuals who are authorized to certify enrollment information to the Department of Veterans Affairs.

<table>
<thead>
<tr>
<th>Name and Address of School or Training Establishment (Include ZIP Code)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ashford University Online  1310 19th Ave. NW  Clinton, IA 97329-0910  Fax Code: 21000415</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Telephone Number(s) of Certifying Official(s) (Include Area Code)</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>E-mail Address of Certifying Official(s)</th>
</tr>
</thead>
</table>

### 5. The Following Are Designated as Certifying Officials of This School or Training Establishment

**A. Officials Designated to Sign VA Enrollment Certifications, Certifications of Change in Student Status, Certifications of Delivery of Advance Payments, Certifications of Pursuit, Attendance, Flight Training, On-the-Job or Apprenticeship Training (as applicable), Other Certifications of Enrollment Are:**

<table>
<thead>
<tr>
<th>No.</th>
<th>Name</th>
<th>Title</th>
<th>Signature</th>
</tr>
</thead>
<tbody>
<tr>
<td>(1)</td>
<td>Paige Grove</td>
<td>Financial Services Military Lead</td>
<td></td>
</tr>
<tr>
<td></td>
<td><a href="mailto:Paige.Grove@ashford.edu">Paige.Grove@ashford.edu</a></td>
<td></td>
<td></td>
</tr>
<tr>
<td>(2)</td>
<td>Anthony Ames</td>
<td>VA Coordinator</td>
<td></td>
</tr>
<tr>
<td></td>
<td><a href="mailto:Anthony.Ames@ashford.edu">Anthony.Ames@ashford.edu</a></td>
<td></td>
<td></td>
</tr>
<tr>
<td>(3)</td>
<td>Shannae Davis</td>
<td>VA Coordinator</td>
<td></td>
</tr>
<tr>
<td></td>
<td><a href="mailto:Shannae.Davis@ashford.edu">Shannae.Davis@ashford.edu</a></td>
<td></td>
<td></td>
</tr>
<tr>
<td>(4)</td>
<td>(See attached pages)</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**B. The Use of the Following Facsimile (e.g., rubber stamp) Signatures for the Officials Listed in Item 5a Above Are Authorized:**

<table>
<thead>
<tr>
<th>(1)</th>
<th>(2)</th>
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<tbody>
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<table>
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<th>(3)</th>
<th>(4)</th>
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<tbody>
<tr>
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### GENERAL INSTRUCTIONS

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### PURPOSE

This form is used to provide the names and signatures of those individuals who are authorized to certify enrollment information to the Department of Veterans Affairs.

### NAME AND ADDRESS OF SCHOOL OR TRAINING ESTABLISHMENT (Include ZIP Code)

Ashford University Online
1310 19th Ave. NW
Clinton, IA 52732-3910

Peax Code 21000415

### TELEPHONE NUMBER(S) OF CERTIFYING OFFICIAL(S) (Include Area Code)

### FOR VA USE ONLY

### E-MAIL ADDRESS OF CERTIFYING OFFICIAL(S)

### THE FOLLOWING ARE DESIGNATED AS CERTIFYING OFFICIALS OF THIS SCHOOL OR TRAINING ESTABLISHMENT

A. OFFICIALS DESIGNATED TO SIGN VA ENROLLMENT CERTIFICATIONS, CERTIFICATIONS OF CHANGE IN STUDENT STATUS, CERTIFICATIONS OF DELIVERY OF ADVANCE PAYMENTS, CERTIFICATIONS OF PURSUITS, ATTENDANCE, FLIGHT TRAINING, ON-THE-JOB OR APPRENTICESHIP TRAINING (AS APPLICABLE), OTHER CERTIFICATIONS OF ENROLLMENT ARE:

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<thead>
<tr>
<th>No.</th>
<th>Name</th>
<th>Title</th>
<th>Signature</th>
</tr>
</thead>
<tbody>
<tr>
<td>(1)</td>
<td>Justin Fritz</td>
<td>VA Coordinator</td>
<td>[Handwritten]</td>
</tr>
<tr>
<td>(2)</td>
<td>Ashley Goodwin</td>
<td>VA Coordinator</td>
<td>[Handwritten]</td>
</tr>
<tr>
<td>(3)</td>
<td>Jamie Jacobson</td>
<td>VA Coordinator</td>
<td>[Handwritten]</td>
</tr>
<tr>
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**NAME AND ADDRESS OF SCHOOL OR TRAINING ESTABLISHMENT (Include ZIP Code)**
Ashford University Online
1310 19th Ave. NW
Clinton, IA 52732-3910
Fac Code 21000415

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**FAX NUMBER OF CERTIFYING OFFICIAL(S) (Include Area Code)**

**E-MAIL ADDRESS OF CERTIFYING OFFICIAL(S)**

**THE FOLLOWING ARE DESIGNATED AS CERTIFYING OFFICIALS OF THIS SCHOOL OR TRAINING ESTABLISHMENT**

A. OFFICIALS DESIGNATED TO SIGN VA ENROLLMENT CERTIFICATIONS, CERTIFICATIONS OF CHANGE IN STUDENT STATUS, CERTIFICATIONS OF DELIVERY OF ADVANCE PAYMENTS, CERTIFICATIONS OF PURSUITS, ATTENDANCE, FLIGHT TRAINING, ON-THE-JOB OR APPRENTICESHIP TRAINING (AS APPLICABLE), OTHER CERTIFICATIONS OF ENROLLMENT ARE:

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<th>SIGNATURE</th>
</tr>
</thead>
<tbody>
<tr>
<td>(1)</td>
<td>Randi Long</td>
<td>VA Coordinator</td>
<td>[Signature]</td>
</tr>
<tr>
<td></td>
<td><a href="mailto:Randi.Long@ashford.edu">Randi.Long@ashford.edu</a></td>
<td></td>
<td></td>
</tr>
<tr>
<td>(2)</td>
<td>Kevin Marik</td>
<td>VA Coordinator</td>
<td>[Signature]</td>
</tr>
<tr>
<td></td>
<td><a href="mailto:Kevin.Marik@ashford.edu">Kevin.Marik@ashford.edu</a></td>
<td></td>
<td></td>
</tr>
<tr>
<td>(3)</td>
<td>Crystal Ward</td>
<td>VA Coordinator</td>
<td>[Signature]</td>
</tr>
<tr>
<td></td>
<td><a href="mailto:Crystal.Ward@ashford.edu">Crystal.Ward@ashford.edu</a></td>
<td></td>
<td></td>
</tr>
<tr>
<td>(4)</td>
<td>(See attached pages)</td>
<td></td>
<td></td>
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1. NAME AND ADDRESS OF SCHOOL OR TRAINING ESTABLISHMENT (Include ZIP Code)
   Ashford University Online
   1210 19th Ave. NW
   Clinton, IA 52732-3910
   Pac Code 21000413

2. TELEPHONE NUMBER(S) OF CERTIFYING OFFICIAL(S) (Include Area Code)

3. FAX NUMBER OF CERTIFYING OFFICIAL(S) (Include Area Code)

4. E-MAIL ADDRESS OF CERTIFYING OFFICIAL(S)

5. THE FOLLOWING ARE DESIGNATED AS CERTIFYING OFFICIALS OF THIS SCHOOL OR TRAINING ESTABLISHMENT

   A. OFFICIALS DESIGNATED TO SIGN VA ENROLLMENT CERTIFICATIONS, CERTIFICATIONS OF CHANGE IN STUDENT STATUS, CERTIFICATIONS OF DELIVERY OF ADVANCE PAYMENTS, CERTIFICATIONS OF PURSUIT, ATTENDANCE, FLIGHT TRAINING, ON-THE-JOB OR APPRENTICESHIP TRAINING (AS APPLICABLE), OTHER CERTIFICATIONS OF ENROLLMENT ARE:

   NO.  NAME                        TITLE                     SIGNATURE
   (1)  Cody Zuidema               VA Coordinator            
        Cody.Zuidema@ashford.edu
   (2)  Shawnen Venema             VA Coordinator            
        Shawnen.Venema@ashford.edu
   (3)                               
   (4)                               

   B. THE USE OF THE FOLLOWING FACSIMILE (e.g., rubber stamp) SIGNATURES FOR THE OFFICIALS LISTED IN ITEM 5A ABOVE ARE AUTHORIZED.

   (1)   
   (2)   
   (3)   
   (4)   

VA FORM MAY 2011 22-8794 EXISTING STOCKS OF VA FORM 22-8794, JAN 2007, WILL NOT BE USED. (See Reverse) ASH1810
5. THE FOLLOWING ARE DESIGNATED AS CERTIFYING OFFICIALS OF THIS SCHOOL OR TRAINING ESTABLISHMENT (Continued)

C. FOR POSTSECONDARY EDUCATIONAL INSTITUTIONS ONLY - OFFICIALS DESIGNATED TO SIGN THE SCHOOL PORTION OF VA FORM 22-1957T, APPLICATION AND ENROLLMENT CERTIFICATION FOR INDIVIDUALIZED TUTORIAL ASSISTANCE, ARE:

<table>
<thead>
<tr>
<th>NO.</th>
<th>NAME</th>
<th>TITLE</th>
<th>SIGNATURE</th>
</tr>
</thead>
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<td>Stephanie Stewart</td>
<td>Director of Financial Aid and Policy</td>
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<td>Cons Stanley</td>
<td>Director of Military Financial Services</td>
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<td>(3)</td>
<td>Jewel Odor</td>
<td>Financial Services Manager</td>
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8. REMARKS

It is acknowledged that each of the individuals designated as certifying officials must successfully complete online training for new certifying officials prior to being granted access to VA's certification system. It is hereby certified that the Department of Veterans Affairs will be notified of any changes in the designations shown on this form as they occur.

7. SIGNATURE AND TITLE OF DESIGNATING OFFICIAL

[Signature] Director, Financial Aid and Policy

6. SIGNATURE AND DATE

[Signature] 5-31-16

PENALTY - The law provides that who ever makes any statement of a material fact knowing it to be false shall be punished by fine or imprisonment or both.

PRIVACY ACT NOTICE: VA will not disclose information collected on this form to any source other than what has been authorized under the Privacy Act of 1974 or Title 38, Code of Federal Regulations 1.576 for routine uses as identified in the VA system of records, 28VA21/22/26, Compensation, Pension, Education, Vocational Rehabilitation and Employment Records - VA, and published in the Federal Register. An example of a routine use (e.g., VA sends educational forms or letters with a veteran's identifying information to the veteran's school or training establishment so (1) assist the veteran in the completion of claims forms or (2) for VA to obtain further information as may be necessary from the school for VA to properly process the veteran's education claim or to monitor his or her progress during training). Your obligation to respond is required to obtain or retain education benefits. VA cannot recognize you as the proper certifying official unless the information is furnished as required by existing law (38 U.S.C. 3680(d)). The responses you submit are considered confidential (38 U.S.C. 5701). Any information provided by applicants, recipients, and others is subject to verification through computer matching programs with other agencies.

RESPONDENT BURDEN: We need this information to identify you as the certifying official for your school or job training establishment when reporting pursuit of training for veterans and other eligible persons (38 U.S.C. 3684). Title 38, United States Code, allows us to ask for this information. We estimate that you will need an average of 10 minutes to review the instructions, find the information, and complete this form. VA cannot conduct or sponsor a collection of information unless a valid OMB control number is displayed. You are not required to respond to a collection of information if this number is not displayed. Valid OMB control numbers can be located on the OMB Internet Page at www.whitehouse.gov/omb/memorandum. If desired, you can call 1-288-GF-BILL (1-888-442-4551) to get information on where to send comments or suggestions about this form.

VA FORM 22-1957T, MAY 2011

ASH1811
VERIFICATION OF NON-CONTRACTED COURSES

School Name: Ashford University

School Address: 8620 Spectrum Center Boulevard San Diego, CA 92123

Facility Code: 21000415

Catalog Year: 2015 - 2016

Courses Offered Under Contract:

38 U.S. Code of Federal Regulations 21.4252(m) states that VA may not approve the enrollment of a veteran, service member, reservist, or eligible person in a course as a part of a program of education offered by any educational institution if that institution or entity providing the course under contract has not obtained a separate approval for the course in the same manner as for any other course as required by VA Regulations.

We have read and understand the above referenced regulation. We certify that the school facility has complete administrative and curriculum oversight of all programs submitted for approval and that no contracted institution, entity or employee, which has not obtained approval to offer Title 38 benefits, has any part in the administrative or curriculum oversight of any program (to include deemed-approved degrees) submitted for approval.

[Signature] [Date] 6/2/2016

The following program(s) do not meet the definition of a contracted program of education. An SAA consultant will contact your facility for further discussion. If none, annotate “N/A”

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Latanaya — Thank you so much for the quick review and update regarding Ashford University's application for approval. Our team is pulling together the requested information and will have it to you today. Again, many thanks. Vickie

Vickie Schray  
SENIOR VICE PRESIDENT  
REGULATORY AFFAIRS & PUBLIC POLICY  
1455 Pennsylvania Avenue NW, Suite 800  
Washington, DC 20004  
P. 202.349.9040  
C. 858.776.9772  
F. 858.225.0290

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F. 877.228.9995

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From: Johnson, Latanaya@CalVet [mailto:Latanaya.Johnson@calvet.ca.gov]  
Sent: Wednesday, June 1, 2016 9:37 PM  
To: Stewart, Stephanie  
Cc: brandon.hawkins@va.gov; Marks, Michael W.; VBAMUSK; Boylan, Keith@CalVet; Schray, Vickie  
Subject: Ashford University CSAAVE Application for Approval - Response

Hello Stephanie,

CSAAVE received the Application for Approval of Accredited Proprietary Institutions for Ashford University, San Diego. In order to facilitate an expeditious application process, I conducted a cursory review of Ashford’s application submission and have identified a few additional items that need to be submitted to CSAAVE to begin our review. Please see the attached letter, which outlines what is necessary to begin our review of Ashford’s application. Once the application is complete, I will assign Ashford’s application to a Specialist for review and processing. The Specialist will contact you directly, should additional clarification or information be necessary.

We look forward to working with Ashford, through the approval process.

Latanaya Johnson,
ALL INSTITUTIONS: Please include your facility code in the subject line of your email.
Hello Stephanie,

CSAAVE received the Application for Approval of Accredited Proprietary Institutions for Ashford University, San Diego. In order to facilitate an expeditious application process, I conducted a cursory review of Ashford’s application submission and have identified a few additional items that need to be submitted to CSAAVE to begin our review. Please see the attached letter, which outlines what is necessary to begin our review of Ashford’s application. Once the application is complete, I will assign Ashford’s application to a Specialist for review and processing. The Specialist will contact you directly, should additional clarification or information be necessary.

We look forward to working with Ashford, through the approval process.

Latanaya Johnson,
Education Administrator | California Department of Veterans Affairs
California State Approving Agency for Veterans Education
916-503-8319 (Direct) | 916-653-1035 (Fax)
www.calvet.ca.gov

Like us on  Follow us on

ALL INSTITUTIONS: Please include your facility code in the subject line of your email.
June 1, 2016

Ms. Stephanie Stewart
Bridgepoint Education, DBA Ashford University
8620 Spectrum Center Boulevard
San Diego, CA 92123-1406

Dear Ms. Stewart:

Today, the California State Approving Agency for Veterans Education (CSAAVE), a division of the California Department of Veterans Affairs, received an initial application for approval for the training of Veterans at Ashford University (Ashford), 8620 Spectrum Center Boulevard, San Diego, CA 92123.

Please submit the following documentation to complete your application:

- Section 2.2 – Ashford’s current printed catalog for operations in California, including relevant policies in accordance with all applicable state and federal requirements (the catalog received by CSAAVE is specific to Ashford’s Clinton, Iowa campus).

- Section 2.5 – Verification of Non-Contracted Courses form (for your convenience, a blank copy of the form is attached);

- Section 2.7 – Current Certificate of Status issued by the California Secretary of State, (for your convenience, the certificate may be requested at the Secretary of State’s website, http://www.sos.ca.gov/business-programs);

- Section 5.3 – Ashford’s Web link to the most recent School Performance Fact Sheet filed with the California Bureau for Private Postsecondary Education; and

CSAAVE will begin the review of Ashford’s application once all of the required documentation is received by CSAAVE.
Ashford University
June 1, 2016
Page 2.

Please mail Ashford’s information and documentation to:

California State Approving Agency for Veterans Education
1227 O Street, Suite 625
Sacramento, CA 95814

If you have questions, please feel free to email CSAAVE at csaaaveinfo@calvet.ca.gov.

Sincerely,

[Signature]

Latanya Johnson,
Education Administrator

Enc: Verification of Non-Contracted Courses form
VERIFICATION OF NON-CONTRACTED COURSES

School Name: 

School Address: 

Facility Code: 

Catalog Year: 

Courses Offered Under Contract:

38 U.S. Code of Federal Regulations 21.4252(m) states that VA may not approve the enrollment of a veteran, service member, reservist, or eligible person in a course as part of a program of education offered by any educational institution if that institution or entity providing the course under contract has not obtained a separate approval for the course in the same manner as for any other course as required by VA Regulations.

We have read and understand the above referenced regulation. We certify that the school facility has complete administrative and curriculum oversight of all programs submitted for approval and that no contracted institution, entity or employee, which has not obtained approval to offer Title 38 benefits, has any part in the administrative or curriculum oversight of any program (to include deemed-approved degrees) submitted for approval.

Signature/Title of School Official 

Date 

The following program(s) do meet the definition of a contracted program of education. An SAA consultant will contact your facility for further discussion. If none, annotate "N/A"

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ASH1818
June 1, 2016

Ms. Stephanie Stewart
Bridgepoint Education, DBA Ashford University
8620 Spectrum Center Boulevard
San Diego, CA 92123-1406

Dear Ms. Stewart:

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CSAAVE will begin the review of Ashford’s application once all of the required documentation is received by CSAAVE.
VERIFICATION OF NON-CONTRACTED COURSES

School Name: 

School Address: 

Facility Code: 

Catalog Year: 

Courses Offered Under Contract:

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Signature/Title of School Official ___________________________ Date ____________

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38FRM-01-15.01

ASH1820
Good Afternoon –

I wanted to let you all know that Ashford University’s application for CSAAVE approval was delivered via fedex today.

Latanaya, I understand that you returned to the office today. Rather than meet this week, we’re requesting time to meet with both you and Keith next week in Sacramento to allow time for you to review our application.

I so look forward to meeting you both. If you have any questions or would like to visit with me in the meantime, please feel free to call me at 858 776 9772.

All the best,

Vickie

Vickie Schray  
SENIOR VICE PRESIDENT  
REGULATORY AFFAIRS & PUBLIC POLICY  
1455 Pennsylvania Avenue NW, Suite 800  
Washington, DC 20004  
| P. 202.349.9040  
| C. 858.776.9772  
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| C. 858.774.3792  
| F. 877.228.9995  

Bridgepoint Education  
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Good Afternoon Ms. Johnson,

Please find attached a letter informing the California State Approval Agency of our intention to submit an application for approval. Our consultant will be delivering a hard copy to your office today. We look forward to working with you to complete the process and would like the opportunity to meet with you next week in person to answer any questions you may have.

I look forward to hearing from you regarding your availability for a meeting with myself and our University President and President Emeritus. Thank you for your assistance and please feel free to contact me at 858 776 9772.

Best regards,
Vickie

Vickie Schray
SENIOR VICE PRESIDENT
REGULATORY AFFAIRS & PUBLIC POLICY
1455 Pennsylvania Avenue NW, Suite 800
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SECTION ONE:
INTRODUCTION

Mission Statement of the University
The mission of Ashford University is to provide high-quality, accessible, affordable, innovative educational programs that meet the diverse needs of individuals pursuing advancement in their lives, professions, and communities.

Statement of Purpose
- To foster a vigorous, diverse learning environment shaped by contemporary awareness, intellectual inquiry, and a shared search for truth in which students gain knowledge and build skills and values useful in their personal and career development.
- To cultivate student-centered learning at all levels, supported by technological resources and led by qualified faculty and staff who are guided by contemporary scholarship and professional practice.
- To promote the development of foundational values relevant to leadership in the 21st century: self-worth, creativity, interdependence, service, integrity, and effectiveness.
- To foster intellectual and personal growth, sensitivity to diversity and human dignity, effective and responsible leadership, environmental responsibility, and lifelong learning.
- To offer online and Clinton campus-based degree programs with foundational perspective, breadth and professional relevance for undergraduate and graduate students.
- To place priority upon institutional effectiveness, excellent value, affordability, responsive student services, accountable administrative processes, continuous assessment of student learning, and curriculum improvement to assure quality in a rapidly changing culture and demonstrate innovative leadership in higher education.
- To maintain operational, financial, and strategic strength to ensure the future of the University.

History
The University, originally named Mount St. Clare College, was founded in 1918 by the Sisters of St. Francis in Clinton, Iowa, as a junior college for women. In 1950, the College was accredited by the North Central Association of Colleges and Schools (now the Higher Learning Commission [HLC]) and has since maintained its regional accreditation. Its interest in adult learners began in 1962 when an evening program was introduced to serve the needs of students with career and family responsibilities. In 1967, the College became coeducational. Baccalaureate degree programs began in 1979 and graduate degrees in 2003, coinciding with the name change to The Franciscan University. In 2005, the University was acquired by Bridgepoint Education, Inc. and renamed Ashford University.

Also in 2005, HLC extended Ashford’s accreditation to offer adult degree-completion programs. Following a Comprehensive Visit in 2006, the University’s accreditation with HLC was reaffirmed for ten years. By 2009, three new Master’s programs were added to the University’s offerings. Today, the University has grown to the extent that students can choose from numerous programs at the undergraduate level and graduate level.

With the growth of the online student population, the University’s leadership decided to move its headquarters from Clinton, Iowa to San Diego, California and to apply for accreditation with the Western Association of Colleges and Schools (WASC). On December 6, 2013, the University received final approval from the U.S. Department of Education for the migration of its accreditation to the WASC Senior College and University Commission (WSCUC).

Accreditation
Ashford University is accredited by WASC Senior College and University Commission (WSCUC), 985 Atlantic Avenue, Suite 100, Alameda, CA 94501, (510) 748-9001, www.wascsenior.org. WSCUC is a regional accrediting body recognized by the U.S. Department of Education (ED) and the Council on Higher Education Accreditation (CHEA).

International Assembly for Collegiate Business Education
Ashford University has received specialized accreditation for its business programs through the International Assembly for Collegiate Business Education (IACBE), located in Lenexa, Kansas, USA. The business programs in the following degrees are accredited by the IACBE:
- Master of Arts in Organizational Management
- Master of Business Administration
- Master of Public Administration
- Bachelor of Arts in Accounting
- Bachelor of Arts in Business Administration
- Bachelor of Arts in Business Economics
- Bachelor of Arts in Business Information Systems
- Bachelor of Arts in Entrepreneurship
- Bachelor of Arts in Finance
- Bachelor of Arts in Human Resources Management
- Bachelor of Arts in International Business
- Bachelor of Arts in Operations Management and Analysis
- Bachelor of Arts in Organizational Management
- Bachelor of Arts in Public Administration
- Bachelor of Arts in Public Relations and Marketing
- Bachelor of Arts in Service Management
- Bachelor of Arts in Sports and Recreation Management
- Bachelor of Arts in Supply Chain Management

Information pertaining to student learning and achievement in the business programs accredited by the IACBE can be obtained by visiting the Ashford University website at https://assessment.ashford.edu.

A copy of the documentation describing the University’s accreditation will be made available to any enrolled or prospective student upon request. Please contact the Acting Vice President of Academic Affairs, Dr. Mihaela Tanasescu, Dr. Tanasescu can be contacted at (800) 798-0584.

Memberships
- Alpha Sigma Lambda
- American Association for Adult and Continuing Education (AAACE)
- American Association of Colleges for Teacher Education (AACTE)
- American Association of Collegiate Registrars and Admissions Officers (AACRAO)
- American Council on Education (ACE)
- American Society for Training & Development (ASTD)
- Association for General and Liberal Studies (AGLS)
- Association of American Colleges and Universities (AAC&U)
- Association of College and University Housing Officers International (ACUHO-I)
- Association of Governing Boards (AGB)
- Association of International Educators
- Association for Institutional Research (AIR)
- Association on Higher Education and Disability (AHEAD)
- Association of Student Conduct Administrators (ASCA)
- Association of Title IX Administrators (ATIXA)
- California Association on Postsecondary Education and Disability (CAPED)
- Central Association of College and University Business Officers (CACUBO)
- The College Board
- Commission for Accelerated Programs (CAP)
- Commission on Sport Management Accreditation (COSMA)
- The Council for Adult and Experiential Learning (CAEL)
- Council for Higher Education Accreditation (CHEA)
- Council of College and Military Educators (CCME)
- Golden Key International Honour Society
- Illinois Association for College Admission Counseling
- International Association of University Presidents
- League for Innovation in the Community College
- Marine Corps Academic Explorer (MCAeX)
- Mountain Pacific Association of Colleges and Employers (MPACE)
- NAFSA: Association of International Educators
- National ACademic ADvising Association (NACADA)
- National Association of Colleges and Employers (NACE)
- National Association of Intercollegiate Athletics (NAIA)
- National Association of State Directors of Teacher Education and Certification (NASDTEC)
- National Association of Student Financial Aid Administrators (NASFAA)
- National Career Development Association
- National Center for Higher Education Management Systems (NCHEMS)
- National Institute for Staff & Organizational Development (NISOD)
- National University Telecommunications Network
- The Observatory on Borderless Higher Education
- President’s Alliance for Excellence in Student Learning and Accountability
- Quality Matters Consortium
- Servicemembers Opportunity College Degree Network School (SOCDNS)
- The Sloan Consortium, Inc.
• Society for Applied Learning Technology (SALT)
• Society for College and University Planning (SCUP)
• Society for Human Resource Management (National and San Diego)
• Student Affairs Administrators in Higher Ed (formerly National Association of Student Personnel Administrators [NASPA])
• Upper Midwest Association of International Educators

Ownership
Ashford University, LLC is a wholly owned subsidiary of Bridgepoint Education, Inc.
13500 Evening Creek Dr. North, Suite 600
San Diego, CA 92128

Bankruptcy Notice
Ashford University does not have a pending petition in bankruptcy, is not operating as a debtor in possession, has not filed a petition within the preceding five years, nor has had a petition in bankruptcy filed against it within the preceding five years that resulted in reorganization under Chapter 11 of the United States Bankruptcy Code (11 U.S.C. Sec 1101 et seq.).

Governance
The Board of Trustees is responsible for the governance of Ashford University. The strategic priorities of the Board include mission, organizational structure, financial and academic integrity, operational responsibility, and planning. Trustees meet regularly to ensure accountability of the University to its students and constituencies. The Board of Trustees appoints the University President to provide overall leadership and to administer the day-to-day operations of Ashford University.

Student Consumer Information
Prospective and current students can locate important information about Ashford University on the Student Consumer Information page on the University website at www.ashford.edu/about/consumer-information.htm. This page includes links to helpful information/disclosures, and is designed to provide open, pertinent information for both prospective and current students. The presentation of this information complies with the Higher Education Opportunity Act of 2008 that reauthorized the Higher Education Act of 1965, as amended (HEA), which requires colleges and universities to publicly disclose various aspects of their policies and procedures. As a prospective student, you are encouraged to review this Catalog prior to signing an enrollment agreement. You are also encouraged to review the School Performance Fact Sheet, which must be provided to you prior to signing an enrollment agreement. School Performance Fact Sheets can be found on each program’s information page on the University website at http://www.ashford.edu/degrees.htm.

Right to Change Requirements
The Ashford University Academic Catalog presents the policies and procedures for all undergraduate and graduate programs offered by the University. The University reserves the right to make alterations to this Catalog and the policies and procedures therein as deemed necessary by the University. Changes may also be necessitated by federal, state, or local law, other regulatory requirements, accreditation, or licensure. Changes may include but are not limited to curriculum, academic policies, administrative policies, procedures, and costs. Notice is not required for a new policy to take effect; however, Ashford University will make reasonable attempts to notify students promptly of any policy changes through communication methods deemed appropriate by the University administration. In the event that the University plans to change a program such that it will impact a student’s graduation requirements, information will be posted at www.ashford.edu/about/consumer-information.htm. Please refer to the Plans to Improve an Academic Program policy in the General Academic Information and Policies section of this Catalog for more information on program revisions.

State Regulatory Information
For a current listing of the states in which Ashford University is licensed, registered, authorized, certified, or exempt, and states where such licensure is not required, please visit www.ashford.edu/statedisclosure.htm. The University will continue to monitor developments in state laws in each state in which it enrolls students and, if authorization or licensure is or becomes necessary, will promptly seek to obtain such approvals. For states with an approved status, please be aware that individual programs may not be approved or may be pending approval by a state licensing authority and cannot be offered to students residing in that state.

A copy of the documentation describing the institution’s licensure, registration, authorization or certification will be made available to any enrolled or prospective student upon request. Please contact Bridgepoint Education, Inc.’s Director of State Compliance for documentation by visiting www.ashford.edu/statedisclosure.htm and clicking on the appropriate link.

The following disclosures are required by various state regulatory authorities:

Alaska: Ashford University’s programs are exempt from authorization under AS 14.48 and 20 AAC Chapter 17 because the programs are online or distance delivered and
the University does not have a physical presence in the state.

**Arkansas:** Arkansas Higher Education Coordinating Board certification does not constitute an endorsement of any institution, course or degree program. Such certification merely indicates that certain minimum standards have been met under the rules and regulations of institutional certification as defined in Arkansas Code §6-61-301. The student should be aware that these degree programs may not transfer. The transfer of course/degree credit is determined by the receiving institution.

**California:** This institution is a private institution approved to operate by the California Bureau for Private Postsecondary Education. Approval to operate means the institution is compliant with the minimum standards contained in the California Private Postsecondary Education Act of 2009 (as amended) and Division 7.5 of Title 5 of the California Code of Regulations.

**Iowa:** Ashford University is registered to operate as a postsecondary educational institutional institution in Iowa by the Iowa College Student Aid Commission, located at 430 East Grand Ave., Floor 3, Des Moines, IA 50309-1920. The telephone number is (877) 272-4456.

**Indiana:** This institution is authorized under IC 21-18.5-6-5 by:
The Indiana Board for Proprietary Education
101 West Ohio Street, Suite 670
Indianapolis, IN 46204-1984
(317) 464-4400 Ext. 138
(317) 464-4400 Ext. 141

**Kansas:** Kansas Board of Regents (approved)
1000 SW Jackson Street, Suite 520
Topeka, KS 66612-1368
(785) 296-3421

**Kentucky:** Kentucky Council on Postsecondary Education (licensed)
1024 Capital Center Drive, Ste. 320
Frankfort, KY 40601
(502) 573-1555

**Minnesota:** Ashford University is registered with the Minnesota Office of Higher Education pursuant to Minnesota Statutes sections 136A.61 to 136A.71. Registration is not an endorsement of the institution. Credits earned at the institution may not transfer to all other institutions.

**Tennessee:** Ashford University is authorized by the Tennessee Higher Education Commission. This authorization must be renewed each year and is based on an evaluation by minimum standards concerning quality of education, ethical business practices, health and safety, and fiscal responsibility.

**Tennessee Residents:** Any grievances not resolved on the institutional level may be forwarded to the Tennessee Higher Education Commission, 404 James Robertson Parkway Ste. 1900, Nashville, TN 37243-0830, (615) 741-3605.

**Washington:** Ashford University is authorized by the Washington state achievement council (the council) and meets the requirements and minimum educational standards established for degree-granting institutions under the Degree-Granting Institutions Act. This authorization is subject to periodic review and authorizes Ashford University to offer specific degree programs. The council may be contacted for a list of currently authorized programs. Authorization by the council does not carry with it an endorsement by the council of the institution or its programs. Any person desiring information about the requirements of the act or the applicability of those requirements to the institution may contact the council at P.O. Box 43430, Olympia, WA 98504-3430.

**Wisconsin Residents:** In the event student complaints are not satisfactorily resolved with the school, students can contact the State of Wisconsin Educational Approval Board at (608) 266-1996.

**Student Complaint State Contact Information**

Students are encouraged to use the University procedures outlined in the Student Rights and Responsibilities section of this Catalog to file an informal complaint or formal grievance. Any student may contact his or her specific state agency directly to register a complaint. For information on registering a complaint in a particular state, go to [http://www.ashford.edu/statedisclosure.htm](http://www.ashford.edu/statedisclosure.htm).

A student or any member of the public may file a complaint about this institution with the California Bureau for Private Postsecondary Education by calling (888) 370-7589 or by completing a complaint form, which can be obtained on the bureau's internet web site ([www.bppe.ca.gov](http://www.bppe.ca.gov)).

**Commitment to Diversity**

Ashford University prepares students to serve populations with diverse social, ethnic, economic, and educational experiences. Both the academic and training curricula are designed to provide an environment in which students can develop the skills and attitudes essential to working with people from diverse backgrounds.

**Statement on Scholarship**

Scholarship at the University refers to the in-depth investigation and shared search for knowledge and truth embodied in the University mission statement. Faculty and students learn to identify relationships and to make
connections, both within their own academic areas of study as well as across disciplinary lines with other programs. They have the opportunity to work collaboratively on scholarly projects within an atmosphere of the highest academic integrity and to share knowledge gained with the University community and beyond.

Examples of scholarship at the University include the following:

- Scholarly research in more specialized areas that is used to enhance regular course offerings or is presented to the campus and local communities in open forums, seminars, and other venues;
- Published works such as papers, articles, essays, editorials, book reviews, books, short stories, poetry, plays, or music;
- Presentations made at professional conferences, seminars, meetings, or conventions.

In addition to joining in scholarly research, faculty and students also share certain responsibilities toward scholarship. These responsibilities include the following:

- Establishing and cultivating a broad general knowledge base across academic programs and acquiring knowledge in one’s own discipline;
- Accepting responsibility for one’s own learning and seeking opportunities for scholarly dialogue; and
- Making the commitment to pursue learning throughout one’s entire life and to assist others in the pursuit of knowledge.

Above all, the faculty continually strives to convey a sense of excitement to their students in the shared search for knowledge and truth.

Ownership and Use of Student Work

Students own the copyright in works created in or as part of an Ashford University course. Students grant to Ashford University and its administration, faculty and staff, a license and/or permission to use their work for research and educational purposes which includes, but is not limited to, institutional and academic research projects, program review, and assignment exemplars.

No personally identifiable information will be included per Institutional Review Board standards for the protection of human rights. In addition, such information will be kept confidential in accordance with FERPA regulations. The University will adhere to all laws, ethics, and criteria for ensuring and protecting rights to privacy and identity.

Ashford University monitors student work for plagiarism, including the use of anti-plagiarism applications, tools, and services. Ashford University maintains the right to submit student work or require a student to submit his or her work to a plagiarism application, tool, or service at any time.

Additionally, Ashford University prohibits the sale of student work as a violation of the Academic Integrity Policy.

In regard to student employees, this policy is upheld for all works created within their roles as students. Works created within their roles as employees are outside the scope of this policy and therefore, held to employee regulations.

Academic and Professional Standards

Central to the University’s mission is a commitment to high-quality learning opportunities and educational programs that are accessible, affordable, and innovative. Seeking to serve diverse needs, the University embraces the liberal arts as a perspective for learning in its undergraduate programs and offers graduate studies within a framework of professional competence. Through this learning environment, the institution encourages and engages students in the pursuit of intellectual growth, social responsibility, and lives characterized by service and personal integrity.

Institutional Outcomes

To achieve organizational effectiveness, Ashford University is committed to developing and improving student learning through continuous assessment of course objectives, faculty contributions, learning environments, student performance, and program outcomes.

Graduates of Associate’s and Bachelor’s programs at Ashford University will be able to:

- Synthesize theories and approaches from the subject areas of the general education curriculum to address complex problems.
- Integrate skills from the general education competencies when interpreting ideas and arguments in order to respond to civic, societal, environmental, and economic challenges.
- Synthesize proficiencies appropriate to the degree level and discipline or major.
- Construct ethical responses to contemporary issues.

Graduates of Master’s programs at Ashford University will be able to:

- Synthesize core proficiencies in the major area of study in a manner appropriate to the degree level to important issues within the field.
- Integrate skills from core competencies in order to respond to civic, societal, environmental, and economic challenges.
- Synthesize theories and approaches to the discipline in solving complex problems.
- Construct ethical responses to contemporary issues.
• Demonstrate lifelong learning skills and self-reflective capacity by engaging in continuous professional and scholarly development.

University's Self-Evaluation Process
The extent to which the University is actively pursuing the fulfillment of its mission is re-examined on an annual basis through its strategic planning process. The University strongly believes in the need to continually improve its programs and services through the following strategies:

• An ongoing cycle of systematic assessment, evaluation, and institutional research;
• Analysis and evidence-based planning;
• Creation of innovations and new initiatives to better meet student needs;
• Budgeting based on identified needs and opportunities for improvement; and
• Monitoring of initiatives to ensure that intended results are being achieved.

Continuous improvement efforts at Ashford rest on its strategic planning model. To enhance the University’s planning and analytical capacity and to enrich research and data analyses that inform these processes, the Offices of Strategic Planning & Management and Institutional Effectiveness are located within the same department. The department is led by the Senior Vice President of Strategic Planning and University Services, who serves on the President’s Cabinet and regularly interacts with the Ashford Board and institutional and faculty committees. This organizational placement will ensure that data use and planning permeate the institution and that evidence-based discussions regularly occur at the highest levels of Ashford leadership.

Staff within this department collaborates with Ashford University leadership, Board of Trustees, faculty and staff to ensure institutional strategic planning, data collection and analysis is student focused, systematic and cross functional. Progress on strategic planning objectives, supporting analytical assessment and resource allocation are regularly reviewed and measured; objectives will be revised as they are accomplished.

Ashford University Research
Ashford University is committed to providing students with innovative solutions to improve learning and their educational experiences. As such, Ashford University continually seeks and studies new approaches to instruction, curriculum and content presentation, assessment, and so forth. As an Ashford University student you may utilize an innovative learning tool, approach to learning, or other support. Your consent is implied when you enroll in a course, take advantage of a learning tool, and/or are exposed to a strategy to enhance your experiences here at Ashford University. Informed consent will be sought in particular situations that may pose a risk or require additional protections. In those cases, students will be made aware of the pros and cons of participation, their participation options, and other information to inform decision-making prior to requesting informed consent. Students may contact the Chair of the Ashford University Institutional Review Board at irb@ashford.edu with any questions about this statement.

Ashford University Graduate Culture Definition
Ashford University’s graduate programs provide robust, rigorous learning experiences for students to prepare future professionals and leaders in the global economy. At the graduate level, our programs focus on building capacity in our students to synthesize, evaluate, create, and apply knowledge in their field of specialized study, as well as in interdisciplinary studies. At the graduate level, faculty members act as facilitators of learning, where they support students through direct and inquiry-based approaches to promote student learning through research, scholarship and applied practice in the field. We foster a learning environment that supports student abilities to transfer skills and knowledge to real world situations, and to develop the professional skills necessary to be successful professionals, leaders, and citizens in society.

Ashford University Graduate Culture Characteristics
1. Graduate level faculty ensure students are challenged by rigorous academic curriculum and hold students to high expectations in their academic work.
2. Faculty and students reflect a highly developed framework of ethics; academically, personally, and professionally.
3. Faculty and students demonstrate a high level of research, analysis, synthesis, and evaluation of pertinent topics in their specialized discipline through discussion, reflection, collaboration, written work, and practical experience.
4. Faculty and students at the graduate level advance the body of scholarship in their field of study, as well as in work and professional environments in local, national, and/or international settings.
5. Faculty and students leverage technology in innovative ways for teaching and learning.
6. Faculty and students examine and evaluate the research or scholarship of the discipline to produce scholarly or creative work consistent with disciplinary standards.
7. Graduate faculty seek to prepare innovators and leaders who demonstrate 21st century skills and professional soft skills necessary to be successful in the field, such as tenacity, perseverance, adaptability, communication, collaboration, and leadership.

8. Faculty and students are held to high expectations for excellence in written and oral communication with the ability to convey complex ideas clearly, consistently, and logically.

Reference

Assessment at Ashford University
As active learners at Ashford University, students share the responsibility for their learning. It is only through cooperative participation in the assessment process that Ashford can better understand itself and better serve its students. Each Ashford student is expected to participate in outcomes assessment. We believe in using assessment to provide students the feedback they need to monitor progress toward their goals. We also use assessment as a vehicle for educational improvement and as a source of measuring the success of our students over the course of their academic career at Ashford. Assessment helps us identify where and how our programs are succeeding and where changes need to be made. We also believe in sharing publicly the aggregated results of student assessments in a transparent manner to inform all audiences about the quality of education at Ashford. Since assessment results are a direct reflection of institutional quality, it is important for everyone to take their participation in assessment activities seriously.

Assessment at Ashford takes place at the institutional, general education, program and course levels. At the institutional level, assessment is conducted primarily via surveys. General education, program and course-level assessment may include examples of student work, a paper, some test questions, a presentation, or other work that may be selected for assessment. The information obtained from assessment activities is essential for improving the learning opportunities and environments provided by the University, and we consider assessment of student achievement, learning, and satisfaction fundamental for Ashford University to accomplish its mission and purposes.

Contact Information
For additional information pertaining to this Catalog, please contact Ashford University at (800) 798-0584 (toll-free) or write to 8620 Spectrum Center Blvd. San Diego, CA 92123. Obtain information by visiting the University website at www.ashford.edu.

Any questions a student may have regarding this Catalog that have not been satisfactorily answered by the institution may be directed to the Bureau for Private Postsecondary Education at 2535 Capitol Oaks Drive, Suite 400, Sacramento, CA 95833 or P.O. Box 980818, West Sacramento, CA 95798-0818, www.bppe.ca.gov, (888) 370-7589 or by fax (916) 263-1897.
SECTION TWO: STUDENT RIGHTS AND RESPONSIBILITIES

Freedom of Inquiry and Expression
Ashford University is committed to preserving the exercise of freedom of inquiry, freedom of thought, freedom of discussion and expression, and the right of petition and peaceful assembly. A student who exercises his or her rights as a private citizen, whether individually or collectively, must assume full responsibility for the consequences of such actions and must not identify his or her position or actions as representing the University.

Exercise of Rights of Citizenship
As members of the academic community, students are entitled to all the rights and protections enjoyed by other members of the community. Students are also subject to obligations by virtue of this membership.

Institutional Authority and Local, State, and Federal Penalties
When students violate University regulations, they are subject to disciplinary action by the University, whether or not their conduct violates local, state, or federal laws. By committing an act of misconduct, a student or organization may be subject to disciplinary action by the University. Conduct regulations apply to misconduct only when the conduct adversely affects some distinct and clear interest of the University academic community. Students who act in concert to violate University regulations, or students who advise or incite to violate University regulations, are also responsible for such violations.

When students violate local, state, or federal law(s), they may incur penalties as determined by local, state, or federal authorities. Institutional actions shall not be used to duplicate functions of general laws, but when the alleged violation of the law also adversely affects the orderly operation of the University, the University may enforce its own regulations regardless of any federal, state, or local legal proceedings or dispositions. University action will be initiated only when the institution’s interest as an academic community is involved.

The Family Educational Rights and Privacy Act of 1974
The U.S. Department of Education's Family Educational Rights and Privacy Act (FERPA) regulations afford students certain rights with respect to their education records. FERPA rights begin upon the student’s enrollment, which occurs when the student has been admitted to the University and attends any portion of a course. FERPA protected rights include the following:

1. The right to inspect and review the student’s education records within 45 days of the day the University receives a request for access.
   - Students should submit written requests that identify the record(s) they wish to inspect to the University Registrar. The Registrar will make arrangements for access and notify the student of the time and place where the records may be inspected. If the records are not maintained by the Registrar’s Office, the Registrar’s Office will facilitate the student’s access to the requested records.

2. The right to request the amendment of the student’s education records that the student believes is inaccurate, misleading, or otherwise in violation of the student’s privacy rights under FERPA.
   - Students may ask the University to amend a record that they believe is inaccurate, misleading, or otherwise in violation of the student’s privacy rights under FERPA. They should write to the Registrar, clearly identifying the part of the record they want changed, and specifying why it should be changed.
   - If the University decides not to amend the record as requested by the student, the University Registrar will notify the student in writing of the decision and advise the student of his or her right to a hearing regarding the request for amendment. Additional information regarding the hearing procedures will be provided to the student when notified of the right to a hearing.
   - If, as a result of the hearing, Ashford University decides that the information in the education record is not inaccurate, misleading, or otherwise in violation of the privacy rights of the student, the student will be afforded the opportunity to place with the education record a statement commenting on the contested information in the record and/or a statement setting forth any reason for disagreeing with the decision of the hearing. The statement placed in the education record by the student will be maintained with the contested part of the record for as long as the record is maintained. When the related record is disclosed to an authorized party, the record will include the statement filed by the student.

3. The right to provide written consent prior to disclosures of personally identifiable information contained in the student’s education records, except
to the extent that FERPA authorizes disclosure without consent.

- An exception, which permits disclosure without consent, is disclosure to school officials with legitimate educational interests. A school official has a legitimate educational interest if the official needs to review an education record in order to fulfill his or her professional responsibilities for the University. A school official may include any of the following:
  - A person employed by the University in an administrative, supervisory, academic, research, or support staff position (including law enforcement unit personnel and health staff);
  - A person or company with whom the University has contracted (such as an attorney, auditor, or collection agent);
  - A person or organization acting as an official agent of the institution and performing a business function or service on behalf of the institution;
  - A person serving on the Board of Trustees; or
  - A student serving on an official committee, such as a disciplinary committee, or assisting another school official in performing his or her professional responsibilities.

- Upon request, the University discloses education records without consent to officials of another school in which a student seeks or intends to enroll, or is already enrolled so long as the disclosure is for purposes related to the student’s enrollment or transfer.

- The University may disclose education records without consent in connection with financial aid for which the student has applied or which the student has received, if the information is necessary to determine eligibility for the aid, determine the amount of the aid, determine the conditions of the aid, or enforce the terms and conditions for the aid.

- The University may disclose education records without consent to parents in the following circumstances:
  - When a student is a dependent student as defined in Section 152 of the Internal Revenue Code of 1986;
  - When the student has violated any federal, state, or local law, or any rule or policy of Ashford University, governing the use or possession of alcohol or a controlled substance if Ashford University determines that the student has committed a disciplinary violation with respect to that use or possession, and the student is under the age of 21 at the time of the disclosure to the parent; or
  - The disclosure is in connection with a health or safety emergency.

- The University may disclose education records without consent when the information is deemed necessary to protect the health or safety of the student or other individuals in an emergency.

- The University may disclose education records without consent to comply with a judicial order or lawfully issued subpoena.

- Directory information can be published and/or disclosed to outside organizations without a student’s prior written consent. “Directory information” means information contained in an education record of a student that would not generally be considered harmful or an invasion of privacy if disclosed. If the student does not want Ashford University to disclose directory information from his or her education records without prior written consent, the student must notify the University Registrar in writing. A request for nondisclosure of directory information is valid unless or until the student requests a change in writing. Ashford University has designated the following information as directory information:
  - Student’s name
  - Participation in officially recognized activities
  - Address
  - Telephone listing
  - Electronic mail address
  - Photograph
  - Degrees, honors, and awards received
  - Date and place of birth
  - Major field of study
  - Dates of attendance
  - Grade level
  - The most recent educational agency or institution attended
  - Enrollment status (e.g., undergraduate or graduate, full-time or part-time)
  - Class rosters within the classroom

- The University may disclose education records without consent to authorized representatives of the U. S. Comptroller General, the U. S. Attorney
General, the U.S. Secretary of Education, or state and local educational authorities, such as a state postsecondary authority that is responsible for supervising the University’s state-supported education programs.

- Disclosures under this provision may be made in connection with an audit or evaluation of federal- or state-supported education programs, or for the enforcement of or compliance with federal legal requirements that relate to those programs. These entities may make further disclosures to outside entities that are designated by them as their authorized representatives to conduct any audit, evaluation, or enforcement or compliance activity on their behalf.

- The University may disclose education records without consent to accrediting organizations to carry out their accrediting functions.

- The University may disclose education records without consent to organizations conducting studies for, or on behalf of, the school, in order to: (a) develop, validate, or administer predictive tests; (b) administer student aid programs; or (c) improve instruction.

- The outcome of a conduct hearing is part of the education record of any student personally identified, and is protected from release under FERPA. However, Ashford University observes the following legal exceptions:

  - Complainants and accused in sexual misconduct and sexual harassment incidents have a right to be informed of the outcome and sanctions of the hearing, in writing, without condition or limitation, and to be kept apprised of the status of investigations;

  - The University may release the final results of a disciplinary proceeding in which a student who is an alleged perpetrator of a crime of violence* or non-forcible sex offense, is found in violation of the University’s Student Community Standards. The University may not disclose the name of any other student, including the victim or witness, without the prior written consent of the other student. The University will also release this information to the complainant in any of these offenses regardless of the outcome;

  - In the event that the alleged victim is deceased as a result of the crime or offense, the notification will be made to next of kin (upon written request).

*A crime of violence includes arson, burglary, robbery, criminal homicide (manslaughter by negligence, murder, and non-negligent manslaughter), forcible sex offenses, assault, destruction/damage/vandalism of property and kidnapping/abduction.

- The University may also disclose education records without consent under other exceptions authorized by FERPA.

4. The right to file a complaint with the US Department of Education concerning alleged failures by Ashford University to comply with the requirements of FERPA. The name and address of the Office that administers FERPA is:

   Family Policy Compliance Office
   US Department of Education
   400 Maryland Avenue, SW
   Washington, DC 20202-5920

 Personally Identifiable Information

The U.S. Department of Education’s Family Educational Rights and Privacy Act (FERPA) regulations expanded the circumstances under which a student’s education records and personally identifiable information contained in such records (including Social Security Number, grades, or other private information) may be accessed without prior consent. First, the U.S. Comptroller General, the U.S. Attorney General, the U.S. Secretary of Education, or state and local education authorities (Federal and State Authorities) may allow access to student records and personally identifiable information without prior consent to any third party designated by a Federal or State Authority to evaluate a federal- or state-supported education program. The evaluation may relate to any education program, which is defined as any program “that is principally engaged in the provision of education,” such as early childhood education, elementary and secondary education, postsecondary education, special education, career and technical education, adult education, and job training, as well as any program that is administered by an education agency or institution. See 34 CFR § 99.3.

Second, Federal and State Authorities may allow access to a student’s education records and personally identifiable information without prior consent to researchers performing certain types of studies, even when the University objects to or does not request such research. Federal and State Authorities must obtain certain use-restriction and data security promises from the entities that they authorize to receive any personally identifiable information, but the Authorities need not maintain direct control over such entities. In addition, in connection with Statewide Longitudinal Data Systems, State Authorities may collect, compile, permanently retain, and share without prior consent personally identifiable information from a student’s education records, and they may track a student’s participation in education and other programs by
linking such personally identifiable information to other personal information about a student that they obtain from other Federal or State data sources, including workforce development, unemployment insurance, child welfare, juvenile justice, military service, and migrant student records systems.

The University maintains student records in compliance with FERPA and applicable state regulations. Students who would like more information on these policies may contact the Registrar’s Office.

Assessing Student Success
Ashford University has developed and maintains systems and instruments to assess student learning outcomes. Data gathered via these instruments are used to track and monitor the progression of students. By tracking and monitoring student progression, evaluation of standards, practices, and resource decisions can be made. This data also provides the University with meaningful input that is used to review and improve institutional processes.

Electronic Communication
Email is considered an official form of University-related communication. It is recommended that students check their email daily in order to stay current with University-related communications. Students have the responsibility to recognize that certain communications may be time-critical. Students interested in opting out of email communication should review the following section, Student Consent to the Electronic Delivery of Official University Communications and Records. Failure to check for messages and failure to receive messages due to full mailboxes, spam filtering, or auto-forwarded email are not acceptable excuses for missing official University communications. Students must maintain and provide the University with an email address other than their Ashford University-issued email address. In addition, students may choose to use their Ashford University-issued email address as their primary mechanism for University communications.

Student Consent to the Electronic Delivery of Official University Communications and Records
The ESIGN Act, 15 U.S.C. Section 7001 et seq., requires Ashford University to provide students with certain information about how electronic records are provided, and to obtain student consent to provide certain records in electronic form. In order to enroll, apply for, or receive information about financial aid, obtain or authorize release of information from student records, and conduct other business with Ashford University, online students must indicate consent to sign agreements electronically, and receive records from the University in electronic form. A student’s consent to the electronic delivery of official University communications and records is collected in the online application.

Students may withdraw consent to electronic delivery, retention, and execution of records by sending a fax to (866) 512-7601 or a letter to the Office of the Registrar located at 8620 Spectrum Center Blvd, Suite 100, San Diego, CA, 92123, including the statement “I withdraw my consent to electronic delivery, retention, and execution of records.” Any withdrawal of consent shall have prospective effect only, and shall not affect the legal effectiveness, validity or enforceability of consents, agreements, notices, disclosures, or other records provided or made available prior to the withdrawal of consent. If such consent is withdrawn, students may be administratively withdrawn from the University.

Monitoring of Email Communications: The University does not intend to monitor individual electronic mail as a routine matter, but may do so at any time as the University deems necessary for purposes of maintaining the integrity and effective operation of the student email system. No facility exists on this system for the sending or receiving of private communications.

The University reserves the right to inspect and disclose the contents of email as follows: in the course of an investigation triggered by indications of misconduct or misuse; as needed to protect the health and safety of students and staff; as needed to prevent interference with the academic mission; or as needed for technical troubleshooting or spam/content filtering.

Contact Information
All students should regularly review and update their contact information to ensure the University has a valid mailing address, telephone number, and email address. Ashford University maintains this information as part of the student record and requires students to update their contact information regardless of whether they have requested nondisclosure of directory information.

Name Changes
If Ashford University becomes aware that a student’s name recorded in the Ashford University system does not match the student’s official name as reflected by the United States Social Security Administration, the Registrar’s Office will change the name in all systems to reflect the student’s legal name.

If the student has an official name change, he or she must complete the Ashford University Name Change form and provide copies of a Social Security card reflecting the new name, along with supplemental documentation, as outlined on the Name Change form, to the Office of the Registrar.
Nondiscrimination
Ashford University does not discriminate in its education programs and activities on the basis of race, color, creed, national or ethnic origin, religion, sex, pregnancy, childbirth and related medical conditions, marital status, medical condition, genetic information, service in the uniformed services, political activities and affiliations, age, disability, sexual orientation, gender identity, veteran status, or any other consideration made unlawful by federal, state, or local laws. Specifically, Title IX/SAVE requires the University not to discriminate on the basis of gender/sex in its education programs and activities. Gender/sex harassment, including gender/sex violence, is a form of prohibited gender/sex discrimination. Examples of covered acts are found in the University’s policies on Sexual Misconduct.

Questions regarding Title IX may be referred to the Ashford University Title IX Coordinator, Poppy Fitch, at titleix@ashford.edu, or 8620 Spectrum Center Blvd., San Diego, CA 92123, 866.974.5700 Ext. 20702 or to the Office for Civil Rights at Office for Civil Rights (OCR), United States Department of Education, Washington DC 20201, and/or a criminal complaint with local law enforcement.

Disability Support Services
The University is committed to providing an equal opportunity to access a full educational experience. In accordance with Section 504 of the Rehabilitation Act of 1973, and the Americans with Disabilities Act (ADA) of 1990, as amended, Ashford University prohibits discrimination on the basis of a disability. Reasonable accommodations will be granted to students who present appropriate documentation of disability and are otherwise qualified to participate in their specific program of study. Ashford University’s Office of Student Access and Wellness is dedicated to fostering equal opportunities to student success through accessible educational programs, disability related advocacy, faculty and staff education, and an enhanced awareness of individual abilities and contributions.

Complaints regarding allegations of disability discrimination shall be filed in accordance with the Dispute Resolution Procedures for Student Complaints section referenced in this Catalog.

Effective Communication for Persons with Disabilities
Ashford University will provide information to interested persons with disabilities concerning the existence of support services and accommodations to ensure accessible programs, services, and activities of the University. The University will ensure that no individual with a disability is excluded, denied services, segregated, or otherwise treated differently than other individuals because of the absence of auxiliary aids and services. The University will furnish appropriate auxiliary aids and services where necessary to ensure effective communication with individuals with disabilities.

Disability Documentation
Ashford University will provide reasonable accommodation to students with documented disabilities in order to ensure the accessibility of programs, services, and activities of the University. The University requirements for documentation are based upon the Association on Higher Education and Disability (AHEAD) Best Practices: Disability Documentation in Higher Education.

The process for determining accommodations is a collaborative one that may or may not require third-party documentation. The University reserves the right to request a reasonable level of documentation. One or more of the following documentation categories will be considered in the evaluation of student accommodation requests:

1. Primary Documentation: Student’s Self-Report. Ashford University believes the student is a vital source of information regarding how he or she may be “limited by impairment.” A student’s narrative of his or her experience of disability, barriers, and effective and ineffective accommodations is an important tool which, when structured by interview or questionnaire and interpreted by professional staff, may be sufficient for establishing disability and a need for accommodation.

2. Secondary Documentation: Observation and Interaction. The impressions and conclusions formed by Ashford University disability professionals during interviews and conversations with students or in evaluating the effectiveness of previously implemented or provisional accommodations are important forms of documentation. The University employs qualified and experienced disability professionals who will observe students’ language, performance, and strategies as an appropriate tool in validating student narrative and self-report.

3. Tertiary Documentation: Information from External or Third Parties. Documentation from external sources may include educational or medical records, reports and assessments created by health care providers, school psychologists, teachers, or the educational system. This information is inclusive of documents that reflect education and accommodation history, such as Individual Education Program (IEP), Summary
Of Performance (SOP), and teacher observations.**
External documentation will vary in its relevance and value depending on the original context, credentials of the evaluator, the level of detail provided, and the comprehensiveness of the narrative.

A Note about Documentation:
These guidelines apply to students taking Ashford University classes. Students should be aware that other universities and testing agencies (which administer standardized tests such as the Graduate Record Exam and Law School Admission Test) may require more extensive documentation, and should review their requirements well in advance.

Use of Mobility Devices
Ashford University will maintain facilities accessible to persons with disabilities in compliance with the Americans with Disabilities Act, as amended. Individuals with disabilities who utilize power driven mobility devices, (e.g., any mobility device powered by batteries, fuel, or other engines—whether or not designed primarily for use by individuals with mobility disabilities—that is used by individuals with mobility disabilities for the purpose of locomotion, including golf cars, electronic personal assistance mobility devices [EPAMDS], such as the Segway® PT) may do so within University facilities only when operation of such mobility devices does not pose a substantial risk of harm to students, faculty, staff, or visitors to the campus. Use of power driven mobility devices for the purpose of ambulation between University facilities is permitted. Storage of power driven mobility devices within University facilities should not impede path of travel for pedestrian traffic areas. Responsibility for the securing of power driven mobility devices resides with the user. The University does not accept responsibility for damage, loss, or theft of property stored on its premises.

Use of Service Animals
Service animals, performing a specific task for an individual with a documented disability, are welcome in all University facilities and in all activities of the University. If it is not readily apparent that an animal is a service animal, or the service animal does not have visually identifiable apparel, apparatus, or other evidence that the animal is a service animal, faculty and staff may ask to confirm that the animal is a service animal.

A service animal, as defined by the Americans with Disabilities Act (ADA), is a guide dog, signal dog, or other animal (generally a dog) individually trained to do work or perform tasks in support of a person with a disability. An animal whose sole function is emotional support does not qualify under this definition.

Students and visitors to the University are responsible for the care and supervision of the service animal while on University premises or while engaged in University activities. Care includes, but is not limited to, feeding, toileting and hygiene.

*Disability is defined by the ADA as “a physical or mental impairment with respect to an individual that (a) substantially limits one or more of the major life activities, (b) a record of such an impairment or (c) being regarded as having such an impairment...” 42 U.S.C. §12102

**Revisions to Title III regulations provide, “When considering requests for modifications, accommodations, or auxiliary aids or services, the entity gives considerable weight to documentation of past modifications, accommodations, or auxiliary aids or services received in similar testing situations, as well as such modifications, accommodations, or related aids and services provided in response to an Individualized Education Program (IEP) provided under [IDEA] or a plan describing services provided pursuant to section 504 of the Rehabilitation Act of 1973 as amended.” (28 C.F.R. § 36.309(b)(1)(vi)

Guidance and Section-by-Section Analysis provides these examples of types of information to consider: “recommendations of qualified professionals familiar with the individual, results of psycho-educational or other professional evaluations, an applicant’s history of diagnosis, participation in a special education program, observations by educators, or the applicant’s past use of testing accommodations." 28 C.F.R part 36 (2010)


Contact Information
Students who believe they are in need of accommodations should contact:
The Office of Student Access and Wellness at access@ashford.edu or may review general information regarding disability services and accommodations at www.ashford.edu/accessandwellness.

Students who have a concern about their disability accommodations may contact:
Student Access and Wellness Manager at studentaccessandwellnessmanagers@ashford.edu.
Formal complaints will be handled in accordance with the grievance procedures outlined in this section of this Catalog.

ADA Coordinator of Ashford University,
Poppy Fitch, Associate Vice President, Student Affairs, ADA Coordinator
Sexual Misconduct/Harassment Policy

The University considered the Violence Against Women Reauthorization Act of 2013 (VAWA), and for the purposes of this Policy, the various sexual misconduct definitions listed below are by applicable jurisdictions. Definitions may vary by state.

Sexual Harassment

Sexual harassment includes unwelcome conduct of a sexual nature, such as unwelcome sexual advances, requests for sexual favors, and other verbal, nonverbal, or physical conduct of a sexual nature that has the effect of unreasonably interfering with an individual’s academic or work performance, or creates an intimidating, hostile, or offensive environment. Sexual violence is a form of sexual harassment prohibited by Title IX/SaVE.

Three Types of Sexual Harassment

1. Hostile Environment includes any situation in which there is harassing conduct that is sufficiently severe, pervasive/persistent or patently offensive so that it alters the conditions of education or employment, from both a subjective (the alleged victim’s) and an objective (reasonable person’s) viewpoint. The determination of whether an environment is “hostile” must be based on all of the circumstances. These circumstances could include:
   - The frequency of the conduct;
   - The nature and severity of the conduct;
   - Whether the conduct was physically threatening;
   - Whether the conduct was humiliating;
   - The effect of the conduct on the alleged victim’s mental or emotional state;
   - Whether the conduct was directed at more than one person;
   - Whether the conduct arose in the context of other discriminatory conduct;
   - Whether the statement is a mere utterance of an epithet which engenders offense in an individual, or offends by mere discourtesy or rudeness; and
   - Whether the speech or conduct deserves the protections under other principles such as academic freedom.

Hostile Environment sexual harassment may occur in student to student, faculty/staff to student or student to faculty/staff relationships or third party to student/faculty/staff.
2. Quid pro quo sexual harassment exists when there are:
   - Unwelcome sexual advances, requests for sexual favors or other verbal or physical conduct of a sexual nature; and
   - Submission to or rejection of such conduct results in adverse educational or employment action.

Quid Pro Quo sexual harassment may occur in student to student, faculty/staff to student or student to faculty/staff relationships.

3. Retaliation
   - The University will sanction a faculty, student, or staff member who takes adverse action against a person because of the person’s participation in or support of an investigation of Sexual Misconduct/Harassment. Adverse action includes, but is not limited to, threats, harassment, intimidation (implied threats) or actual violence against the person or his or her property, adverse educational or employment consequences, ridicule, taunting, bullying, or ostracism.

Retaliation sexual harassment may occur in student to student, faculty/staff to student or student to faculty/staff relationships, or third party to student/faculty/staff.

Title IX/SeVE also prohibits gender-based harassment, which may include acts of verbal, nonverbal, or physical aggression, intimidation, or hostility based on sex or sex-stereotyping, even if those acts do not involve conduct of a sexual nature.

Definitions and Examples of Sexual Misconduct/Harassment

Sexual Misconduct Offenses include, but are not limited to:
   - Sexual Violence
   - Sexual Assault
   - Domestic and/or Dating Violence
   - Stalking
   - Sexual Exploitation

*The University reserves the right to determine the applicable definition based upon factors including but not limited to location of alleged offense, applicable laws or location of the University. Under University policy or Title IX or other federal law, conduct may constitute sexual misconduct/harassment even though that conduct does not meet a specific state or other definition of an offense.*

Sexual Violence

Sexual violence is defined as physical sexual acts perpetrated against a person’s will or where a person is incapable of giving consent. A number of different acts fall into the category of sexual violence, including, rape, sexual assault, sexual battery, sexual abuse, and sexual coercion, domestic violence, dating violence, and/or stalking. Sexual violence can be carried out by University employees, other students, or third parties. All such acts of sexual violence are forms of sex discrimination prohibited by Title IX.

Consent

Consent means cooperation in act or attitude pursuant to an exercise of free will and with knowledge of the nature of the act. A current or previous relationship shall not be sufficient to constitute consent. Submission under the influence of fear shall not constitute consent.

Incapacitation

Incapacitation is the physical and/or mental inability to make informed, rational judgments. States of incapacitation include, but are not limited to, unconsciousness, sleep, and blackouts. Where alcohol or drugs are involved, incapacitation is defined with respect to how the alcohol or other drugs consumed affects a person’s decision-making capacity, awareness of consequences, and ability to make fully informed judgments. Being intoxicated by drugs or alcohol does not diminish one’s responsibilities to obtain consent. The factors to be considered when determining whether consent was given include whether the accused knew, or whether a reasonable person should have known, that the complainant was incapacitated.

Sexual Assault

Any person who knowingly inflict sexual intrusion or sexual penetration on a victim commits sexual assault if:
   - The person causes submission of the victim by means of sufficient consequence reasonably calculated to cause submission against the victim's will; or
   - The person knows that the victim is incapable of appraising the nature of the victim’s conduct; or
   - The person knows that the victim submits erroneously, believing the person to be the victim’s spouse; or
   - At the time of the commission of the act, the victim is less than fifteen years of age and the person is at least four years older than the victim and is not the spouse of the victim; or
   - At the time of the commission of the act, the victim is at least fifteen years of age but less than seventeen
years of age and the person is at least ten years older than the victim and is not the spouse of the victim; or

- The victim is in custody of law or detained in a hospital or other institution and the person has supervisory or disciplinary authority over the victim and uses this position of authority to coerce the victim to submit, unless the act is incident to a lawful search; or

- The person, while purporting to offer a medical service, engages in treatment or examination of a victim for other than a bona fide medical purpose or in a manner substantially inconsistent with reasonable medical practices; or

- The victim is physically helpless and the person knows the victim is physically helpless and the victim has not consented.

**Domestic Violence**

Domestic violence means an act or threatened act of violence upon a victim with whom the person is or has been involved in an intimate relationship. “Intimate relationship” means a relationship between spouses, former spouses, past or present unmarried couples, or persons who are both the parents of the same child regardless of whether the persons have been married or have lived together at any time. Domestic violence also includes any other crime against a victim, or against property, including an animal, or any municipal ordinance violation against a person, or against property, including an animal, when used as a method of coercion, control, punishment, intimidation, or revenge directed against a victim with whom the person is or has been involved in an intimate relationship.

**Dating Violence**

The term “dating violence” means violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim; and where the existence of such a relationship shall be determined based on a consideration of the following factors:

- The length of the relationship.
- The type of relationship.
- The frequency of interaction between the persons involved in the relationship.

**Stalking**

A person commits stalking if directly, or indirectly through another person, the person knowingly:

- Makes a credible threat to another person and, in connection with the threat, repeatedly follows, approaches, contacts, or places under surveillance that person, a member of that person’s immediate family, or someone with whom that person has or has had a continuing relationship; or

- Makes a credible threat to another person and, in connection with the threat, repeatedly makes any form of communication with that person, a member of that person’s immediate family, or someone with whom that person has or has had a continuing relationship, regardless of whether a conversation ensues; or

- Repeatedly follows, approaches, contacts, places under surveillance, or makes any form of communication with another person, a member of that person’s immediate family, or someone with whom that person has or has had a continuing relationship in a manner that would cause a reasonable person to suffer serious emotional distress and does cause that person, a member of that person’s immediate family, or someone with whom that person has or has had a continuing relationship to suffer serious emotional distress. For purposes of this paragraph, a victim need not show that he or she received professional treatment or counseling to show that he or she suffered serious emotional distress.

**Sexual Exploitation**

Occurs when a person takes non-consensual or abusive sexual advantage of another for his or her own advantage or benefit, or to benefit or advantage anyone other than the one being exploited, and that behavior does not otherwise constitute one of the other Sexual Misconduct/Harassment offenses. Examples of sexual exploitation include, but are not limited to:

- Prostituting another student;
- Non-consensual video or audio-taping of sexual activity;
- Going beyond the boundaries of consent (such as letting your friends hide in the closet to watch you having consensual sex);
- Engaging in voyeurism; and
- Knowingly transmitting an STI or HIV to another student.

**Confidentiality**

Students or parents of minor students, reporting incidents of Sexual Misconduct/Harassment may ask that the students’ names not be disclosed to the accused or that no investigation or disciplinary action be pursued to address the alleged Sexual Misconduct/Harassment. The University strongly supports a student’s interest in confidentiality in cases involving Sexual Misconduct/Harassment. There are situations in which the University must override a student’s request for
confidentiality in order to meet its Title IX obligations; however, these instances will be limited and the information will only be shared with individuals who are responsible for handling the University’s response to incidents of Sexual Misconduct/Harassment. Given the sensitive nature of reports of Sexual Misconduct/Harassment, the University will ensure that the information is maintained in a secure manner. The University is aware that disregarding requests for confidentiality can have a chilling effect and discourage other students from reporting Sexual Misconduct/Harassment. In the case of minors, state mandatory reporting laws may require disclosure, but will generally be followed without disclosing information to University personnel who are not responsible for handling the University’s response to incidents of Sexual Misconduct/Harassment.

Even if a student does not specifically ask for confidentiality, to the extent possible, the University will only disclose information regarding alleged incidents of Sexual Misconduct/Harassment to individuals who are responsible for handling the University’s response. To improve trust in the process for investigating Sexual Misconduct/Harassment complaints, the University will notify students of the information that will be disclosed, to whom it will be disclosed, and why. Regardless of whether student complainant requests confidentiality, the University will take steps to protect the complainant as necessary, including taken interim measures before the final outcome of an investigation.

For Title IX purposes, if a student requests that his/her name not be revealed to the accused or asks that the University not investigate or seek action against the accused, the University will inform the student that honoring the request may limit its ability to respond fully to the incident, including pursuing disciplinary action against the accused. The University will also explain that Title IX includes protection against retaliation, and that University officials will not only take steps to prevent retaliation but also take strong, responsive action if it occurs. This includes retaliatory action taken by the University and University officials. When the University knows or reasonably should know of possible retaliation by other students or third parties, including threats, intimidation, coercion, or discrimination (including harassment), it will take immediate and appropriate steps to investigate or otherwise determine what occurred. The University will protect the complainant and insure his/her safety as necessary.

If the student still requests that his/her name not be disclosed to the accused, or that the University not investigate or seek action against the accused, the University will determine whether or not it can honor such a request while still providing a safe and non-discriminatory environment for all students, including the student who reported the Sexual Misconduct/Harassment. The Title IX Coordinator will evaluate confidentiality requests.

If the University determines that it can respect the student’s request not to disclose his/her identity to the accused it will take all reasonable steps to respond to the complaint consistent with the request. Although a student’s request to have his/her name withheld may limit the University’s ability to respond fully to an individual allegation of Sexual Misconduct/Harassment, the University will investigate other means available to address the Sexual Misconduct/Harassment, without initiating formal action against the accused or revealing the identity of the student complainant. The University will also take immediate action as necessary to protect the student while keeping the identity of the student confidential.

Resources
Students should contact the Office of Student Access and Wellness Student Advocate HELPLine at (866) 974-5700 ext. 24357 in order to access support services.

For additional resources, please refer to the Counseling, Treatment, and Rehabilitation Programs section in the Student Support, Health, and Safety section of this Catalog.

Retaliation
This policy also prohibits retaliation against a person who reports Sexual Misconduct/Harassment, assists someone with a report of Sexual Misconduct/Harassment, or participates in any manner in an investigation or resolution of a Sexual Misconduct/Harassment report. Retaliation includes threats, intimidation, reprisals, and/or adverse actions related to employment or education.

Recordkeeping
The Title IX/SaVE Coordinator, along with Legal & Compliance is responsible for maintaining records relating to sexual harassment and sexual violence reports, investigations, and resolutions. Records shall be maintained in accordance with University Record Retention Policies. All records pertaining to pending litigation or a request for records shall be maintained in accordance with instructions from Legal & Compliance.

Reporting/Filing a Complaint for Title IX (Gender/Sex Discrimination)
Sexual Misconduct/Harassment is a threat to the entire University community. Members from the University community are strongly encouraged to report all incidents that threaten a student’s continued well-being, safety, or
security. Complaints from any member of the University community relating to discrimination, misconduct, harassment, domestic violence, dating or other related violence, stalking, or retaliation based on gender or sex concerning a faculty, staff, a student or students should be reported to:

Title IX/SaVE Coordinator for Ashford University:

Poppy Fitch, Associate Vice President, Student Affairs, Title IX/ADA Coordinator

Poppy Fitch can be contacted at:
Phone: (866) 974-5700, ext. 20702
Email: titleix@ashford.edu
Mailing Address: 8620 Spectrum Center Blvd, San Diego, CA 92123

Christina Jaquez, Student Conduct Specialist, Deputy Title IX Coordinator

Christina Jaquez can be contacted at:
Phone: (866) 974-5700, ext. 20793
Email: titleix@ashford.edu
Mailing Address: 8620 Spectrum Center Blvd, San Diego, CA 92123

The Title IX/SaVE Coordinator is responsible for the oversight, coordination and implementation of all Title IX compliance activities for the University. Title IX/SaVE Coordinator responsibilities include, but are not limited to, monitoring of the ongoing publication of the University’s policy of Nondiscrimination including the Title IX/SaVE Coordinators' contact information, continuous monitoring and oversight of overall University activities for compliance with Title IX requirements including athletic equity, grievance procedures, investigations, sanctions and evaluating requests for confidentiality.

University personnel will inform students in writing of procedures that victims should follow, including:

- The importance of preservation of any evidence;
- Options regarding the assistance of local law enforcement, University officials;
- The option to decline assistance, or decline notifying local law enforcement;
- Any interim protective measures that will be taken and their options for protective orders; and
- Resources including counseling, health, and mental health services.

Individuals with complaints of any nature described above always has the right to simultaneously file a formal complaint with the Office for Civil Rights (OCR), United States Department of Education, Washington DC 20201, and/or a criminal complaint with local law enforcement.

In addition, the complainant or the accused has the right to a representative of his/her choosing at any point during the process.

Other Complaints

All other complaints, including non-harassment, other forms of sex/gender based discrimination, misconduct, harassment, violence or retaliation based on race, color, creed, national or ethnic origin, religion, pregnancy, childbirth and related medical conditions, marital status, gender identity, medical condition, service in the uniformed services, political activities and affiliations, age, disability, veteran status, or any other consideration made unlawful by federal, state, or local laws, should follow the relevant procedure outlined in the Dispute Resolution Procedure for Student Complaints and/or contact:

Shandell Ruiz at (866) 475-0317, ext. 11322, Pedro Hernandez, ext. 11382, or any member of the Student Dispute Resolution Center at Dispute.Resolution@ashford.edu or (866) 974-5700 ext. 20091.

An individual may also file a complaint or grievance alleging discrimination, misconduct, harassment, domestic violence, dating or other related violence, stalking, or retaliation based on gender or sex in the procedure outlined in the Dispute Resolution Procedure for Student Complaints, if they prefer; however these complaints will be routed back to the Title IX/SaVE Coordinator.

The above complaint processes (Gender/Sex and Other Complaints) involve a thorough, impartial investigation designed to provide a fair, prompt, and reliable determination about whether the University nondiscrimination policies have been violated. As necessary, the University reserves the right to initiate a complaint, to serve as complainant, and to initiate conduct proceedings without a formal complaint by the victim.

The University has an obligation to report any crimes of which it has knowledge under the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (Clery Act).

Receipt of Complaint

Upon receiving notice of a possible violation of the Sexual Misconduct/Harassment policy, the University will take immediate and appropriate steps to:

- End the behavior;
- Conduct a prompt, fair and impartial investigation;
- Remedy the effects, and
- Prevent it from reoccurring.
Referral to Office of Student Grievance Resolution

Upon receipt of a complaint, the Title IX/SaVE Coordinator will refer the complaint to the Office of Student Grievance Resolution (OSGR), and if necessary, to Employee Relations, for investigation.

- The investigation will be completed and findings and sanctions issued within sixty (60) calendar days from the receipt of the complaint, barring documented unforeseen circumstances.

- In all complaints, the Title IX/SaVE Coordinator and, if necessary, Human Resources, will determine the need for initial, short term remedial actions.

- In order to protect the complainant, at any time during the investigation, the University may recommend short term, or interim, protections or remedies. These remedial actions may include, but are not limited to, making the complainant aware of their rights, resources and support services, issuance of No Contact orders to separate or limit contact between the parties, modification of extracurricular, transportation, dining, working or living arrangements or course schedules, assignments or tests, increased monitoring, supervising, or security at applicable locations or activities, and/or interim suspension(s) pending investigation. These remedies or protections may apply in ground or online contexts.

- Efforts will be made to minimize the burden on the complainant. Failure to comply with these interim protections may be considered a separate violation of this policy.

OSGR and, if necessary, Human Resources staff, will mutually conduct an immediate initial investigation to determine if there is reasonable cause to charge the accused individual, and what policy violations should be alleged as part of the complaint. If a reasonable cause exists, OSGR and, if necessary, Human Resources staff, will mutually prepare the initial investigation report and if applicable, a proposed Notice of Charges on the basis of the initial investigation and submit it to the Title IX/SaVE Coordinator for further action.

Once the Title IX/SaVE Coordinator receives a copy of the report of initial findings, the Title IX/SaVE Coordinator will review the findings and make a determination within three (3) calendar days of receipt of the initial investigation report and if applicable, the proposed Notice of Charges as to whether reasonable cause exists to bring charges against the accused individual. If reasonable cause exists, the matter shall proceed to a formal investigation.

- If the Title IX/SaVE Coordinator determines there is insufficient evidence to support reasonable cause, the Title IX/SaVE Coordinator or designee or, if necessary, Human Resources, will simultaneously and in writing inform the complainant and the accused that the investigation is discontinued. The interim, short term actions taken will be reversed.

Notice of Charges and Continued Investigation of Complaint

- The decision whether to continue the Investigation will be made and communicated to the parties within fifteen (15) calendar days of the receipt of the complaint, barring documented unforeseen circumstances. The Title IX/SaVE Coordinator or his/her designee, will simultaneously communicate in writing to the parties the continuation of the investigation and intent to present the accused with a Notice of Charges.

- If the Title IX/SaVE Coordinator determines there is sufficient evidence to support reasonable cause and approve the charges, the Title IX/SaVE Coordinator and, if necessary, Human Resources staff, will mutually determine the need for additional, short term remedial actions for any parties involved in the complaint.

In order to protect the complainant, at any time during the investigation, the University may recommend short term, or interim, protections or remedies. These remedial actions may include, but are not limited to, making the complainant aware of their rights, resources and support services, issuance
of No Contact orders to separate or limit contact between the parties, modification of extracurricular, transportation, dining, working or living arrangements or course schedules, assignments or tests, increased monitoring, supervising, or security at applicable locations or activities, and/or interim suspension(s) pending investigation. These remedies or protections may apply in ground or online contexts.

- Efforts will be made to minimize the burden on the complainant. Failure to comply with these interim protections may be considered a separate violation of this Policy.

- The investigator(s) will conduct the investigation in a manner appropriate in light of the circumstances of the case, which will typically include interviews with the complainant, the respondent, and any witnesses. As part of the investigation, the University will provide an opportunity for the parties to present statements, witnesses, and other evidence. The interviews will be supplemented by the gathering of any physical, documentary, or other evidence, as appropriate and available including but not limited to law enforcement investigation documents and student or employee personnel files. The investigation is deemed to be adequate, reliable, impartial, prompt, balanced and fair, and all individuals will be treated with appropriate sensitivity and respect throughout the investigation.

- Any requests for updates on the status of the investigation prior to its completion should be directed to the Title IX/SaVE Coordinator.

- The investigator will make a finding and present the findings to the Title IX/SaVE Coordinator within forty-five (45) calendar days of the receipt of the complaint, barring documented unforeseen circumstances.

- The Title IX/SaVE Coordinator will communicate the results, if applicable, to Human Resources staff.

- At any time during this process, the individual maintains the right to simultaneously file a formal complaint with the Office of Civil Rights (OCR), United States Department of Education, Washington DC 20201, and/or a criminal complaint with local law enforcement.

Presentation of Investigation Findings to the Parties

- The Title IX/SaVE Coordinator or designee, or, if necessary, Human Resources staff, will simultaneously and in writing communicate the findings to the accused and the complainant within fifty (50) calendar days of the receipt of the complaint, barring documented unforeseen circumstances. This communication will inform the parties whether the preponderance of the evidence supports a finding against the accused for the alleged violation(s).

- The communicated findings will inform the parties as to 1) whether there is a finding of sexual harassment; 2) whether the interim measures will continue; 3) what actions will be taken, including any disciplinary procedures that will be initiated; and 4) whether any assistance will be provided to the victim.

- Where the accused is found not responsible for a violation, the Title IX/SaVE Coordinator and Human Resources staff where applicable, will consider the reversal of any remedial actions taken.

- The accused or the complainant may appeal the findings in part or in whole; the Title IX/SaVE Coordinator or his/her designee will advise the parties of the criteria for appeal of the findings when communicating the findings.

Investigation Findings: Acceptance

- If the complainant and/or accused individual(s) accept the findings in whole, each shall notify the Title IX/SaVE Coordinator within three (3) business days of communication of findings. If the complainant and/or accused individual do not indicate his/her acceptance or Appeal of the findings within three (3) business days of communication, non-communication will be considered acceptance and the University will proceed accordingly with the process four (4) business days following communication of the investigation findings.

- The Title IX SaVE/Coordinator will review all case information and determine appropriate sanctions within eight (8) business days following notification of all findings to the complainant and accused individual, barring documented unforeseen circumstances. If the accused is an employee, the Title IX/SaVE Coordinator in coordination with the Human Resources staff will determine appropriate sanctions.

- The Title IX/SaVE Coordinator, or Human Resources staff (if applicable) shall, within two (2) business days, barring documented unforeseen circumstances, simultaneously and in writing inform the complainant and the accused of the sanction decision.

- Sanctions against student(s) determined by this process are subject to the Sanction Appeal Process by either the accused or complainant.
Investigation Findings Appeal

- If the complainant and/or the accused individual(s) disagree with the findings, in part or in totality, either the complainant or the accused may appeal the finding in part or in totality on the following bases:
  - The accused and/or complainant wants consideration of new evidence, which was unavailable during the original investigation that could be outcome determinative. A summary of this new evidence and its potential impact must be included;
  - The accused and/or complainant alleges that a material deviation from written procedures impacted the fairness of the process in a way that could be outcome determinative;
  - The accused and/or complainant challenges the assertion that the evidence presented during the investigation process was sufficient to find them responsible by a preponderance of the evidence; or,
  - The accused and/or complainant alleges bias by the investigator, or the Title IX/SaVE Coordinator which deprived the process of impartiality in a way that was outcome determinative.

The accused and/or complainant have five (5) business days, barring documented unforeseen circumstances from the date of communication of findings, to present the formal appeal, in writing, to the Acting Vice President for Academic Affairs of Ashford University, Dr. Mihaela Tanasescu.

The Acting Vice President for Academic Affairs may be contacted as follows:
Email: Mihaela.Tanasescu@ashford.edu
Mailing Address:
Dr. Mihaela Tanasescu
Acting Vice President for Academic Affairs
Ashford University
8620 Spectrum Center Blvd, San Diego, CA 92123

Investigation Finding: Appeal Process

- Upon receipt of either party’s appeal of the findings, the Provost will acknowledge receipt of the notice within three (3) business days.
- The written appeal must state the basis for appeal and provide sufficient information that supports the grounds for appeal.
- The Provost or her designee will review all cases presented for appeal within five (5) business days of the appeal, barring documented unforeseen circumstances, to determine if the presented grounds for appeal and supporting information will be accepted or rejected.
- If the appeal does not meet the stated grounds for appeal, the appeal will be rejected. The Provost, shall, within two (2) business days of the determination, barring documented unforeseen circumstances, simultaneously and in writing, inform the complainant and the accused the appeal decision.
- If the Provost determines there is sufficient evidence to support an appeal, the matter will return to the Office of Student Grievance Resolution for further investigation unless the appeal alleges bias of the investigator which deprived the process of impartiality in a way that was outcome determinative or an assertion that the evidence was insufficient to meet the preponderance of the evidence standard. In those cases, the appeal will remain with the Provost or his/her designee for review and final decision.
- Whether the investigation goes to the Office of Student Grievance Resolution or remains with the Provost or his/her designee, the appeal investigation will be completed within fourteen (14) calendar days of submission to the Provost, barring documented unforeseen circumstances that may extend the appeal review.
- The Provost, and if applicable in coordination with Human Resources, will communicate the appeal findings simultaneously and in writing to the complainant and the accused.
- Additionally, the Provost will consult with the Title IX/SaVE Coordinator and Human Resources (when necessary) to consider the reversal of any remedial actions taken.

Additional Information for Sexual Misconduct/Harassment Investigations

Amnesty Policy. Ashford University encourages the reporting of crimes by victims and/or witnesses. Sometimes, victims and/or witnesses are hesitant to report to University officials because they fear that by reporting an incident he/she may be accused of policy violations, such as underage drinking at the time of the incident. It is in the best interests of this community that as many victims and/or witnesses as possible choose to report to University officials. To encourage reporting, Ashford University pursues a policy of offering victims and/or witnesses of crimes immunity from policy violations related to the incident, as long as those policy violations are not directly related to the crime itself. For example, if a student reported a rape in which he or she was involved as an accused individual, he or she would not be immune from policy violations.
Attempted Violations. In most circumstances, Ashford University will treat attempts to commit Sexual Misconduct/Harassment as if those attempts had been completed.

False Reporting. Ashford University will not tolerate intentional false reporting of incidents.

Group Actions. When members of groups, individuals acting collusively, or members of an organization act in concert in violation of any policy, they may be held accountable as a group or individually, and may proceed against the group of jointly accused students, or individually, at the discretion of the University.

Right to Present Own Complaint or Use Proxy. The alleged victim has the right to present his or her own complaint if he or she wants to, or to ask the University to stand as complainant in his or her place.

Sexual History. Questioning or presenting of evidence about the complainant’s prior sexual conduct with anyone other than the accused will be prohibited. Evidence of a prior consensual dating or sexual relationship between the parties by itself does not imply consent or preclude a finding of Sexual Misconduct/Harassment.

University as complainant. As necessary, Ashford University reserves the right to initiate a complaint, to serve as complainant, and to initiate conduct proceedings without a formal complaint by the victim of Sexual Misconduct/Harassment.

Possible Sanctions and Protective Measures

- Any student found responsible for violating the policy on Sexual Misconduct/Harassment may receive a sanction ranging from a verbal warning, probation, and suspension to expulsion/termination, depending on the severity of the incident, and taking into account any previous documented conduct issues. If the accused individual is an employee, sanctions will be determined by Title IX/SaVE Coordinator in consultation with Human Resources if applicable.

- In order to protect the complainant, at any time during the investigation, the University may recommend short term, or interim, protections or remedies. These remedial actions may include, but are not limited to, making the complainant aware of their rights, resources and support services, issuance of No Contact orders to separate or limit contact between the parties, modification of extracurricular, transportation, dining, working or living arrangements or course schedules, assignments or tests, increased monitoring, supervising, or security at applicable locations or activities, and/or interim suspension(s) pending investigation. These remedies or protections may apply in ground or online contexts.

- Efforts will be made to minimize the burden on the complainant. Failure to comply with these interim protections may be considered a separate violation of this policy.

Sanction Process

The Title IX/SaVE Coordinator will review all case information and determine appropriate sanctions within five (5) business days of notification of acceptance or determination on appeal barring documented unforeseen circumstances.

Sanction Appeal Process

- Where either party, the accused or the complainant, disagrees with the sanction(s), either has five (5) business days from the date sanctions are communicated, barring documented unforeseen circumstances to present an appeal of the sanctions, in writing, to the Provost. The written request for appeal of the sanctions must state one or more of the five (5) basis for appeal (see the following), along with facts and information that support the grounds for appeal; and be accompanied by any relevant, new information or evidence that was not available during the investigation phase of the process. The Title IX/SaVE Coordinator will forward all case information to the Provost or designee who will make a determination as to whether there is sufficient evidence to support an appeal of sanctions on the basis of:
  - The availability of new information, unavailable during the original investigation, that could be outcome determinative regarding sanctions;
  - A potential material deviation from written procedures which impacted the fairness of the process in a way that was outcome determinative regarding the sanctions;
  - The potential of bias by the Title IX/SaVE Coordinator which may have deprived the process of impartiality in a way that was outcome determinative.
  - A belief that a sanction(s) is substantially disproportionate to the severity of the offense.

- The sanction(s) appeal will be reviewed by the Provost within five (5) business days of the sanction appeal notice, barring documented unforeseen circumstances, to determine whether there are sufficient grounds for appeal.
• If the appeal of the sanctions does not state a ground for appeal or sufficiently meet the grounds for appeal, the appeal will be rejected by the Provost or designee and the decision to reject the appeal communicated to the Title IX/SaVE Coordinator and if applicable Human Resources.

• The Title IX/SaVE Coordinator and if applicable Human Resources, will simultaneously and in writing inform the complainer and the accused of the rejection of the appeal within seven (7) calendar days of the determination, barring documented unforeseen circumstances.

• The Title IX/SaVE Coordinator will impose all sanctions on the accused student for the violation. Human Resources in consultation with the Title IX/SaVE Coordinator will impose all sanctions on the accused employee. Once the sanctions are carried out, the case will be closed.

• If the Provost determines there are grounds for the sanction appeal, the Provost will review all information presented with the sanction appeal and make a final sanction determination within fourteen (14) calendar days of acceptance of the appeal of sanctions, barring documented circumstances that may extend the determination. The Provost will forward the determination to the Title IX/SaVE Coordinator.

• The Title IX/SaVE Coordinator and if applicable, Human Resources, will simultaneously and in writing inform the complainer and the accused of the appeal decision within seven (7) calendar days of the decision, barring documented unforeseen circumstances.

• The Title IX/SaVE Coordinator or designee, and if applicable, Human Resources, will impose all sanctions for the violation. Once the sanctions are carried out, the case will be closed.

Nondisclosure Agreements. The University will not require a party to abide by a nondisclosure agreement, in writing or otherwise, that would prevent the redisclosure of information related to the outcome of the proceeding.

Dispute Resolution Procedure for Student* Complaints

The Ashford University community benefits from informal processes and formal procedures that encourage prompt and equitable resolution of complaints and concerns that students may have about the implementation of policies and procedures that govern the institution.

Who May File A Complaint: The Student Dispute Resolution Center (Center) addresses complaints filed by an individual student, alumnus, former student, prospective applicant, or applicant. The terms “student” and “complainant” are used interchangeably.

Complaints initiated by attorneys on behalf of students will begin at Step III below.

No Reprisal: Students will not be subjected to reprisal or retaliation for using or participating in the Dispute Resolution Procedure.

Issues Eligible for Review: Issues eligible for review by the Center include, but are not limited to, implementation of policies and procedures that govern the institution, issues concerning transcripts, transfer credit, technology, financial aid, online classroom issues, course scheduling, personal hardship matters, student accounts, military benefits matters, disability-related matters, and advising.

Issues Not Eligible for Review: Issues not eligible for review by the Center include grade appeal, challenge of course content, transfer credit appeal, appeal of satisfactory academic progress, appeal of dismissal, and appeal of Student Community Standards Committee findings.

The Dispute Resolution Procedure may only be used for these issues if the challenge relates to allegations of bias or discrimination. Otherwise, appeals of those matters should follow the procedures outlined elsewhere in this Catalog.

Allegations of sexual harassment, violence, or discrimination will be addressed according to the section entitled Nondiscrimination or Sexual Misconduct/Harassment Policy in this Catalog.

Dispute Resolution Procedure

Step I: Departmental Resolution

Students should address the complaint or concern at the departmental level with the individual involved in the complaint (e.g., Advisor, Collections Specialist, Faculty Support and Development Associate, Instructor, Manager, etc.). If satisfactory resolution is not reached after discussion with the individual or if it is impracticable to address the problem or complaint with the individual, the student should contact the individual’s direct supervisor to attempt to resolve the complaint. If the student’s concerns remain unresolved the student should proceed to filing a complaint with the Center.

How to File a Complaint

An individual student, alumnus, former student, prospective applicant, or applicant (“student” or “complainant”) may file a complaint with the Center by