



October 26, 2023

Joseph L. Garcia, Executive Director
Education Service
Veteran Benefits Administration
Via email

Re: Florida Career College, UEI College, and United Education Institute

Dear Director Garcia,

We are writing to urge VA and the appropriate State Approving Agencies (SAAs) (copied on this letter) to exercise your oversight authority with respect to three affiliated schools – Florida Career College (FCC), UEI College, and United Education Institution. Specifically, we urge you to reassess the approval status for FCC, in accordance with 38 U.S.C. § 3675(b)(4) and 38 U.S.C. § 3696, and to conduct risk-based surveys for UEI College and United Education Institute. (According to the Department of Education, these three institutions are all owned by IEC Corporation (IEC)).¹

The Department of Education has made a determination to terminate FCC’s participation in federal student financial aid (hereinafter “Title IV” aid) following an investigation that uncovered serious noncompliance issues. Presently, FCC is not allowed to enroll any new students using Title IV aid and FCC’s participation in Title IV will conclude on January 31, 2024.² The Department’s investigation included findings against FCC and the schools’ ultimate parent, IEC, and it appears the Department of Education has now informed IEC that UEI College and United Education Institute also are the subject of an ongoing investigation.³ The Department reportedly is investigating specific allegations regarding “falsification of attendance records leading to improper retention of federal student aid, and misrepresentation to prospective students.”⁴ The California Attorney General also has issued an investigative subpoena, according to one of the schools’ accreditors.⁵

Further, UEI College and United Education Institute are facing a potential loss of accreditation. Pursuant to 38 U.S.C. §3673(e)(3)(D), a risk-based survey is required if an educational institution faces the “loss or risk of loss” of accreditation. One institutional accreditor, the

¹ Letter from Department of Education to IEC, RE: Florida Career College-Denial of Recertification Application to Participate in Federal Student Financial Assistance Programs (April 11, 2023) (“IEC US Holdings, Inc.... owns and operates FCC, and IEC US Holdings is, in turn, owned by IEC Corporation (“IEC”). IEC is also the ultimate parent of United Education Institute and UEI College...”), p. 2. Letter available at: <https://vetsedsuccess.org/letter-from-dept-of-education-to-florida-career-college-denial-of-recertification-application-to-participate-in-federal-student-financial-assistance-programs/>.

² *Important Information for Students Attending Florida Career College*, Federal Student Aid, updated as of June 5, 2023, <https://studentaid.gov/announcements-events/florida-career-college> (last accessed 10/24/23).

³ ACCSC System-Wide Continued Warning letter (September 11, 2023) p. 5, available at <https://www.accsc.org/UploadedDocuments/2023/Public-Notice/Redacted-Letters/IEC-SW-Continued-Warning-Redacted.pdf>.

⁴ *Id.* at 7-8.

⁵ *Id.* at. 5.

Accrediting Commission of Career Schools and Colleges (ACCSC) has issued a [System-Wide Warning](#)⁶ to the schools and IEC. The institutional accreditor for other locations, the Accrediting Council for Continuing Education and Training (ACCET)⁷ has [deferred](#) reaccreditation pending further review.⁸ More details are below.

The totality of information available from the two accreditors and the Department of Education, as well as student complaint information in the GI Bill Comparison Tool, indicate that immediate action is needed to protect student veterans and their hard-earned GI Bill benefits. As discussed more fully below, we urge VA and the SAAs to reassess the approval status for FCC, in accordance with 38 U.S.C. § 3675(b)(4) and 38 U.S.C. 3696, and to conduct risk-based surveys for UEI College and United Education Institute. During the risk-based surveys, we urge the SAAs and VA to review the accreditors' information, the Department of Education's findings in the investigation of FCC, as well as the student complaints submitted to VA and the California Attorney General investigative subpoena.

Separately, we urge you to immediately correct the GI Bill Comparison Tool regarding all three schools.

Florida Career College Approval Status

We contacted you in [November](#) last year to urge risk-based surveys of FCC⁹ because FCC is on Heightened Cash Monitoring 2 status with the Department of Education. Subsequently, FCC was denied recertification under Title IV after a Department of Education investigation resulted in findings of misconduct against FCC and the parent company, IEC.¹⁰ We contacted you again in [April](#) of this year, following the Department's decision regarding FCC's participation in Title IV, to urge VA and SAAs to exercise their oversight responsibilities to protect current and prospective student veterans.¹¹ While the Department of Education has determined that FCC's participation in Title IV will conclude on January 31, 2024 and is [not allowing](#) FCC to enroll any

⁶ Accrediting Commission of Career Schools and Colleges Public Notice of Warning as of October 10, 2023, available at: <https://www.accsc.org/Commission-Actions/Schools-on-Warning.aspx> (last accessed 10/24/23). **ACCSC Directory of Accredited Institutions:** UEI College-Fresno, CA; UEI College-Gardena, CA; UEI College-Riverside, CA; UEI College-Bakersfield, CA; UEI College-Sacramento, CA; UEI College-Tacoma, CA, and United Education Institute-Las Vegas, NV; United Education Institute-Stone Mountain, GA; United Education Institute-Albuquerque, NM; found at: <https://www.accsc.org/Directory/index.aspx>. Additionally, ACCSC's System-Wide Warning included United Education Institute-Dallas, TX, although this school does not appear in the ACCSC directory.

⁷ **ACCET Directory of Accredited Institutions:** UEI College-Chula Vista, CA; UEI College-Garden Grove, CA; UEI College-Huntington Park, CA; UEI College-Mesa, AZ; UEI College-Oceanside, CA; UEI-Ontario; UEI College-Phoenix, AZ; UEI College-Stockton, CA; UEI College-West Covina, CA; UEI College-Morrow, GA; found at <https://accet.org/member-institution-directory> (last accessed 10/24/23).

⁸ Accrediting Council for Continuing Education and Training (ACCET) Letter to UEI College, Regarding Reaccreditation Deferred (April 26, 2023) found at U.S. Department of Education, Database of Accredited Postsecondary Institutions and Programs (DAPIP), [UEI College-Huntington Park Campus](#) and [UEI College-Phoenix](#) (additional location), (last accessed 10/24/23).

⁹ VES Letter to VA regarding Florida Career College (Nov. 21, 2022) available at <https://vetsedsuccess.org/letter-to-va-regarding-florida-career-college/>.

¹⁰ Letter from Department of Education, Re: Florida Career College-Denial of Recertification Application to Participate in Federal Student Financial Assistance Programs (April 11, 2023) available at <https://vetsedsuccess.org/letter-from-dept-of-education-to-florida-career-college-denial-of-recertification-application-to-participate-in-federal-student-financial-assistance-programs/>.

¹¹ VES Letter to VA regarding Florida Career College's Loss of Title IV Approval (April 13, 2023) available at <https://vetsedsuccess.org/our-letter-to-va-regarding-florida-career-colleges-loss-of-title-iv-approval/>

new Title IV students, it does not appear that VA took similar protective action for prospective or newly enrolling student veterans.

FCC appears in the Comparison Tool as approved to receive GI Bill benefits. We urge VA to review the information surrounding FCC and determine whether it is appropriate for FCC to continue to have VA's stamp of approval.

Although FCC says it is not currently enrolling new students,¹² such assurances cannot always be relied upon, in light of prior examples of crumbling for-profit colleges which pledged not to enroll new students but nevertheless did. Moreover, the school has current enrollees who may be at risk. VA and the SAAs have obligations to investigate whether FCC has violated the law and/or if the school is subject to disapproval to receive GI Bill funds. To sustain VA approval, accredited schools are required by 38 U.S.C. §3675(b)(4) to be approved for and participating in Title IV.¹³ We urge VA and SAAs to act prudently for the protection of student veterans' benefits and, at a minimum, suspend FCC's approval for new enrollees under 38 U.S.C. §3679(f)(4),

Moreover, we strongly urge VA and the SAAs to review FCC's approval status in light of the [findings](#) in the Department's investigation. According to the Department of Education's summary,

The Department made findings, supported by substantial evidence, that FCC violated the regulations governing ATB [ability to benefit] testing.... The Department further concluded that those violations were known and encouraged by senior leaders at both FCC and its parent company. Moreover, the investigation revealed that these violations were committed, at least in part, to maximize enrollment of Title IV students in FCC programs.... The Department's investigation also uncovered evidence of other non-compliant conduct, including falsification of attendance records and misrepresentations to FCC's accreditation agency about its job placement rates.¹⁴

Institutions that engage in substantial misrepresentation are subject to having their programs disapproved under 38 U.S.C. §3679(a) and (f) and 38 U.S.C. §3696. Indeed, Congress has directed, "Whenever the Secretary becomes aware of a final judgment by a Federal agency against an educational institution or owner of an educational institution pertaining to substantial misrepresentation... or of other credible evidence relating to a violation of subsection (a), the Secretary, in partnership with the applicable State approving agency, shall—" alert the school and owner that it is at risk of losing its VA approval, require an auditor's report on the school's advertising and enrollment practices, and "refer the matter to the Under Secretary of Benefits" to

¹² See <https://www.floridacareercollege.edu/>

¹³ "As a condition of approval under this section, the State approving agency...must find the following: The educational institution is approved and participates under title IV of the Higher Education Act of 1965...." 38 U.S.C. §3675(b)(4). As provided in 38 U.S.C. §3679(a), "any course approved for the purposes of this chapter which fails to meet any of the requirements of this chapter...shall be immediately disapproved by the Secretary or the appropriate State approving agency."

¹⁴ Letter from Department of Education to IEC, RE: Florida Career College-Denial of Recertification, at 2.

make determinations regarding the violations and potential suspension or revocation of approval.¹⁵

UEI College and United Education Institute Accreditor Concerns

Pursuant to 38 U.S.C. §3673(e)(3)(D), risk-based surveys are required because UEI College and United Education Institute are at risk of losing their accreditation.

Risk of Loss of Accreditation from ACCSC

In [May](#), the Accrediting Commission of Career Schools and Colleges (ACCSC) issued a “System-Wide Warning”¹⁶ to IEC for the UEI College and United Education Institute locations it accredits due to the serious issues uncovered in the [Department’s investigation of FCC](#). ACCSC notified IEC, “The Department’s [FCC] investigation and action create immediate questions regarding the schools’ compliance with accrediting standards. The issues set forth above demand the Commission’s heightened scrutiny and as such the Commission has elected to take additional steps.”¹⁷ ACCSC directed IEC to submit documents and information for a subsequent review in August, including information regarding its “owners’, management employees’, and administrative employees’ demonstrated commitment to ethical, fair, and honest practice” as well as their commitment to “compliance with accrediting standards and all applicable federal, state, and local requirements.”¹⁸

The System-Wide Warning remains in effect following ACCSC’s review in August.¹⁹ ACCSC notified IEC by [letter dated September 11, 2023](#), that “the Commission voted to continue the above-listed schools on **System-Wide Warning** with a subsequent review scheduled for ACCSC’s February 2024 meeting.”²⁰ ACCSC noted that not only does its original concerns remain, but also the Department has since notified IEC of an “ongoing investigation regarding United Education Institute and UEI College.”²¹ According to ACCSC, the Department’s notice of an investigation into UEI College and United Education Institute contains specific allegations regarding “falsification of attendance records leading to improper retention of federal student aid, and misrepresentation to prospective students.”²² The alleged misrepresentations to prospective students include, according to ACCSC, “misrepresentations regarding promises of employment and the nature of their federal financial aid loans.”²³

ACCSC determined that ongoing review is needed regarding compliance with ACCSC’s standards and “IEC’s specific efforts to show its commitment to ethical, fair, and honest

¹⁵ 38 U.S.C. §3696(f)

¹⁶ ACCSC System-Wide Warning letter delivered to the Chief Executive Officer, International Education Corporation (May 23, 2023), available at <https://www.accsc.org/UploadedDocuments/2023/Public-Notice/Redacted-Letters/IEC-SW-Warning-Redacted.pdf>.

¹⁷ *Id.* at 4.

¹⁸ *Id.* at 5.

¹⁹ ACCSC System-Wide Continued Warning letter to IEC (September 11, 2023) available at <https://www.accsc.org/UploadedDocuments/2023/Public-Notice/Redacted-Letters/IEC-SW-Continued-Warning-Redacted.pdf>.

²⁰ *Id.* at 1; see footnote 5, *supra*, for list of schools.

²¹ *Id.* at 8.

²² *Id.* at 7-8.

²³ *Id.* at 8.

practice.”²⁴ ACCSC directed the schools to “inform current and prospective students in writing that the school has been continued on Warning and to provide a summary of the reasons for the Warning Order.”²⁵ The Department of Education’s Database of Accredited Postsecondary Institutions and Programs currently identifies the ACCSC-accredited schools as on “Probation or Equivalent or a More Severe Status: Warning.”²⁶

Risk of Loss of Accreditation from ACCET

The Accrediting Council for Continuing Education and Training (ACCET) (the accreditor for the other UEI College locations) has deferred reaccreditation pending review of certain “weaknesses” identified at the schools.²⁷ In a [letter addressed to UEI College](#), ACCET raised concerns about representations in a catalog that certain programs “prepare students for third-party certifications,” when “the institution does not track pass rates” for two of the exams and the pass rates for a third exam are “inconsistently tracked.” Further, “the institution allows students in the [HVAC] program to graduate without EPA certification, which is required for employment.”²⁸ ACCET also documented that certain programs are not meeting the accreditor’s benchmarks for completion and job placement rates.²⁹ Additionally, ACCET raised a concern from a visit report that students were able to sign-in to class as if on time when in fact they were late, and the “institution did not demonstrate that the policy [for tracking attendance] is widely understood and followed by instructional staff.”³⁰ ACCET deferred reaccreditation and directed UEI College to submit an interim report with a plan for improving outcomes and addressing the other issues identified.

According to information in the Department of Education’s accreditation database, ACCET deferred reaccreditation in April pending a review that was scheduled for August. The status of ACCET’s review has not been updated in the Department of Education’s database.³¹ ACCET’s directory of institutions, however, shows that the school’s accreditation expires on December 15, 2023.³²

Pursuant to 38 U.S.C. §3673(e)(3)(D), risk-based surveys are required because UEI College and United Education Institute are at risk of losing their accreditation. Under the law, the surveys must be completed no later than 60 days after the SAA receives notice or otherwise become aware of this risk of loss. We urge the SAAs to conduct the surveys and review the information required by 38 U.S.C. §3673A, and other relevant information, including information from the Department of Education’s investigation into FCC and the student complaints to VA.

²⁴ *Id.*

²⁵ *Id.* at 9.

²⁶ Database of Accredited Postsecondary Institutions and Programs, U.S. Department of Education, *see e.g.* entry for UEI College-Fresno, available at <https://ope.ed.gov/dapip/#/institution-profile/158839> (last accessed 10/24/23)

²⁷ ACCET Letter to UEI College-Reaccreditation Deferred Interim Report Required (April 26, 2023), p. 1, available from U.S. Department of Education, Database of Accredited Postsecondary Institutions and Programs (DAPIP), [UEI College-Huntington Park Campus](#) entry, <https://ope.ed.gov/dapip/#/institution-profile/188492>.

²⁸ *Id.*

²⁹ *Id.* at 3-4.

³⁰ *Id.* at 2.

³¹ UEI College’s reaccreditation was deferred in April 2023 pending a review scheduled in August 2023, according to information from the Department of Education’s DAPIP. <https://ope.ed.gov/dapip/#/institution-profile/188492> (last accessed 10/24/23)

³² ACCET Member Institution Directory Information available at <https://accet.org/member-institution-directory> (last accessed 10/24/23)

Department of Education’s Evidence of Substantial Misrepresentations

Furthermore, we urge your prompt investigation of substantial misrepresentations by all IEC-owned schools, in violation of 38 U.S.C. § 3696. Any “entity that owns” an educational institution with a program approved by VA is prohibited under 38 U.S.C. § 3696 from engaging in substantial misrepresentations³³ and from providing incentive payments based on enrollments or financial aid.³⁴ Under § 3696(g) and (h), the Undersecretary should investigate and take action – either suspending or revoking approval or publishing a caution flag – and the Undersecretary’s choice of action shall be guided by the need to ensure sufficient deterrence for future fraud, that the schools have ceased and repudiated the deceptive practices, and that the schools have obtained the services of a third party auditor to monitor the schools’ practices for three years.

In addition to the Undersecretary’s obligations under 3696, Congress has also tasked VA and SAAs with implementing risk-based surveys in a manner that gives “particular attention” to “fraudulent and other criminal activities on the part of persons connected with educational institutions.”³⁵

The Department of Education’s findings in the FCC investigation should be reviewed and all IEC-owned schools should be investigated.

As ACCSC rightly concluded, the Department of Education’s FCC investigation contains findings relating to IEC leadership that are relevant to all IEC-owned schools. The Department’s evidence relating to IEC leadership included, for instance:

- “senior leaders at IEC and FCC knew about, encouraged, and even participated in ATB [ability-to-benefit testing] misconduct. This active involvement touched all campuses. The substantial evidence undermines any claims that the misconduct was isolated.”³⁶
- “IEC and FCC leadership imposed extreme pressure on FCC staff to meet enrollment and start metrics, and to keep students enrolled. While not necessarily a regulatory violation in and of itself, the evidence contradicts FCC’s statements that it has no enrollment quotas... This conflicting evidence negatively reflects on IEC’s and FCC’s candor with the Department and adherence to fiduciary duty standards.”³⁷
- “IEC and FCC leaders pressured instructors to manage attendance and limit drops.”³⁸ While the Department said it “is not, at this time, making a finding of widespread and pervasive violations”³⁹ relating to returning Title IV funds, the Department recounted

³³ “An educational institution with a course or program of education approved under this chapter, and an entity that owns such an educational institution, shall not engage in substantial misrepresentation described in subsection (b).” 38 U.S.C. §3696(a).

³⁴ “An educational institution with a course or program of education approved under this chapter, and an entity that owns such an educational institution, shall not provide any commission, bonus, or other incentive payment based directly or indirectly on success in securing enrollments or financial aid to any persons or entities engaged in any student recruiting or admission activities or in making decisions regarding the award of student financial assistance....” 38 U.S.C. §3696(c).

³⁵ [38 U.S.C. §3673\(a\)](#)

³⁶ Letter from Dept. of Education to IEC Re: Florida Career College-Denial of Recertification, p. 30 available at <https://vetsedsuccess.org/letter-from-dept-of-education-to-florida-career-college-denial-of-recertification-application-to-participate-in-federal-student-financial-assistance-programs/>.

³⁷ *Id.* at 20.

³⁸ *Id.* at 26.

³⁹ *Id.* at 25.

evidence indicating “falsification of attendance reporting,” including the pressure to manage attendance from IEC leaders.⁴⁰ The Department of Education explained, “Attendance records are required to, among other things, establish academic payments periods or establish the last date of attendance for a student who withdraws or stops attending, or to establish a completion of a program of study”⁴¹ and documented that “[o]ver thirty witnesses described instances where FCC falsified attendance records, with the effect of establishing or increasing the amount of Title IV funds the school could retain for a particular student.”⁴²

The Department of Education has now informed IEC that UEI College and United Education Institute are the subject of ongoing investigation, according to ACCSC, and has made specific allegations regarding “falsification of attendance records leading to improper retention of federal student aid, and misrepresentation to prospective students.”⁴³

We urge your prompt examination of these misrepresentations and your prompt action in accordance with § 3696.

State Actions

Further, the California Attorney General has issued an investigative subpoena.⁴⁴ We recommend the SAAs consult with the California Attorney General’s office during a risk-based survey to identify additional issues of concern.

Student Complaints

Student complaints to VA also point to the need for risk-based surveys for UEI College. As of the date of this letter, the GI Bill Comparison Tool entry for [UEI College](#) shows that, in the last twenty-four months, VA has closed at least 26 student complaints. Students complained that UEI College is charging “higher tuition or extra fees” than expected and “made inaccurate claims about the quality of its education or its school requirements,” according to the descriptors in the Comparison Tool. Students also complained, among other matters, that the school is “unable to get or keep accreditation,” would not refund a GI Bill payment, and changed course requirements after enrollment.⁴⁵ The student complaints would seem to raise many of the same concerns identified by the Department of Education regarding the IEC-owned schools.

GI Bill Comparison Tool Corrections

For the reasons discussed below, we respectfully request that VA correct the GI Bill Comparison Tool entries for **UEI College** and **United Education Institute** by (1) adding appropriate caution flags, (2) making sure the schools are correctly identified in the Comparison Tool, and (3)

⁴⁰ *Id.* at 24-27.

⁴¹ *Id.* at 24.

⁴² *Id.* at 25.

⁴³ ACCSC System-Wide Continued Warning letter to IEC (September 11, 2023), pp. 7-8 available at <https://www.accsc.org/UploadedDocuments/2023/Public-Notice/Redacted-Letters/IEC-SW-Continued-Warning-Redacted.pdf>.

⁴⁴ ACCSC System-Wide Continued Warning letter to IEC (September 11, 2023) at 5.

⁴⁵ GI Bill Comparison Tool, Institution Details, <https://www.va.gov/education/gi-bill-comparison-tool/?search=name&name=UEI%20College>. The Comparison Tool entry shows complaints for all campuses with the same 6 digit OPEID, which appears to include [UEI College \(Phoenix, AZ\)](#), [UEI College Huntington Park](#) and [United Education Institute](#) (Morrow) based on the OPEID: 025593 showing in the Tool. (last accessed 10/25/23).

including all student complaint information. The Comparison Tool Entries for **Florida Career College** also need to be corrected so that all locations have cautionary flags showing that the school has been denied recertification by the Department of Education and is on Heightened Cash Monitoring 2 status.

The GI Bill Comparison Tool entries for [UEI College](#) and [United Education Institute](#) need cautionary warnings for accreditor issues. Until on or about August 23, 2023, two UEI College campuses (Gardena and Huntington-Park) had caution flags for accreditor issues; those flags are no longer present. The Comparison Tool entry for the ACCSC accredited schools⁴⁶ should include a caution flag for the System-Wide Warning that has been in effect since May. ACCSC even directed IEC to “inform current and prospective students in writing that the school has been continued on Warning” in its most recent letter.⁴⁷ Likewise, student veterans are entitled to know that the other accreditor, ACCET, is continuing to defer reaccreditation of the locations it accredits.⁴⁸ Please add a Caution Flag for accreditation issues for each of the schools with a link to the relevant information.

Additionally, the Comparison Tool appears to contain incorrect information regarding the VA-approved locations for UEI College and United Education Institute. The Comparison Tool shows an entry for “United Education Institute Morrow” located at 1564 Southlake Pkwy, Morrow, Georgia. This school is identified in the Department of Education accreditation [database](#) and by the [accreditor, ACCET](#), as “UEI College (Morrow)” and not “United Education Institute.” Also, there appear to be several more UEI College locations showing as approved in [WEAMS](#) than appear in the Comparison Tool. We do not know the reason for the differences, but want to bring this to your attention to ensure that the Comparison Tool is accurate and that the risk-based surveys are conducted for all approved schools.

Further, in August the Comparison Tool appeared to show 27 student complaints about UEI College, then in September the Comparison Tool showed only 13 student complaints about UEI College, and as of the date of this letter, the Comparison Tool shows 26 student complaints about UEI College. There is no explanation in the Comparison Tool for the changes, whether there was an error in the September data, or if the twenty-four month look-back period caused complaints to be removed between August and September and a number of new complaints to be added in October. We continue to urge VA to rescind its decision to limit the appearance of complaints earlier than 24 months. VA should include all student complaints in the Comparison Tool to be more transparent about historical data and decisions affecting schools in the Comparison Tool. The history, volume, and nature of complaints is relevant information for students, researchers, and oversight agencies. As shown in this instance, failure to provide all relevant information in the Comparison Tool can lead to confusion and misinformation.

⁴⁶ The schools accredited by ACCSC appearing in the Comparison Tool include UEI College Fresno and UEI College Gardena, although several other campuses appear in WEAMS.

<https://inquiry.vba.va.gov/weamspub/searchInst.do#content-area>
⁴⁷ ACCSC System-Wide Continued Warning letter (September 11, 2023) at 9.

⁴⁸ The schools accredited by ACCET appearing in the Comparison Tool include UEI College-Huntington-Park, UEI College (Phoenix, AZ), and United Education Institute (Morrow, GA). The Morrow, Georgia campus is listed by the accreditor and the Department of Education as “UEI College (Morrow, GA)” and not as “United Education Institute.”

Finally, two of the four Florida Career College entries in the Comparison Tool do not have all the appropriate cautionary warnings. Florida Career College-Miami and Florida Career College-Houston have two cautionary warnings: (1) “Denial of Recertification Application to Participate in the Federal Student Financial Assistance Programs Issued by Department of Education” and (2) “School placed on Heightened Cash Monitoring.” Florida Career College-Orlando only has one cautionary warning, the denial of recertification. Florida Career College-Hialeah has **no** cautionary warnings. All four schools are identified by the Department of Education as “additional locations” of Florida Career College-Miami and as sharing the OPEID 02305800. All four locations should have caution flags for the Denial of Recertification and Heightened Cash Monitoring status. Please add caution flags to the Orlando and Hialeah locations.

The information from the accreditors, the Department of Education, and student complaints to VA demonstrate that risk-based surveys should be conducted for all approved IEC-owned schools. The allegations that the schools have engaged in making misrepresentations to students must be investigated and the Undersecretary must act under § 3696. Further, FCC’s approval status should be reviewed in light of the Department of Education’s determination to terminate FCC’s participation under Title IV. We urge VA and the SAAs to take action as soon as possible to protect current and prospective student veterans and their GI Bill benefits.

Thank you in advance for your attention to these issues.

Respectfully,

Della M. Justice

Della M. Justice
Vice President for Legal Affairs

cc: National Association of State Approving Agencies
California State Approving Agency for Veterans Education
Georgia Department of Veterans Service
Arizona Department of Veterans’ Services
Florida Department of Veterans’ Affairs