

United States Senate  
WASHINGTON, DC 20510

December 13, 2019

The Honorable Betsy DeVos  
Secretary  
U.S. Department of Education  
400 Maryland Ave, SW  
Washington, DC 20202

Dear Secretary DeVos:

We write today to ask you to extend the closed school discharge eligibility lookback period for Dream Center Education Holding's (DCEH) Illinois Institute of Art and Art Institute of Colorado to students who attended or withdrew on or after January 20, 2018.

On January 20, 2018, the Higher Learning Commission (HLC) officially transitioned the Illinois Institute of Art and Art Institute of Colorado to Change of Control Candidacy (CCC) status. At the time, HLC noted that the loss of accreditation could have serious consequences for current and prospective students and that students "should know that their courses or degrees are not accredited by HLC and may not be accepted in transfer to other colleges and universities or recognized by prospective employers."<sup>1</sup> From that date forward, students who attended these two institutions faced a constant state of uncertainty and harm—regardless of when they became aware of it.

As you know, 34 C.F.R. § 685.214(c)(1)(i)(B), gives you the authority in "exceptional circumstances" to extend the closed school discharge lookback period beyond 120 days. In other words, you have the benefit of hindsight when it comes to establishing the effective date of closure of an institution for purposes of ensuring closed school discharge eligibility is fair to students. In this case, hindsight is clear. For the intents and purposes of students attending the Illinois Institute of Art and Art Institute of Colorado, the schools effectively closed on January 20, 2018. After that point, the best case scenario for these students was to graduate with a worthless degree from a non-accredited institution—but the schools' closure prevented even that for many.

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<sup>1</sup> Higher Learning Commission. "Public Disclosure: Illinois Institute of Art and Art Institute of Colorado from "Accredited" to "candidate."" Effective January 20, 2018. Retrieved from <https://www.hlcommission.org/download/PublicDisclosureNotices/PDN%20-%20EDMC%20CofC%20Candidacy%20Jan%202018.pdf>

In November, the Department announced it would cancel the loans taken out by students to attend the Illinois Institute of Art and Art Institute of Colorado between January 20, 2018 and December 31, 2018—when they shut their doors. This relief is incomplete and does not relieve students of any of the debt they had previously taken on to attend the schools and which became worthless on January 20, 2018. Extending the closed school discharge eligibility lookback period for the Illinois Institute of Art and Art Institute of Colorado to January 20, 2018, would allow these students to be fully relieved of the debt they took on to attend these schools.

Please provide a response to our request no later than January 3, 2020. Thank you for your consideration.

Sincerely,



Richard J. Durbin  
United States Senator



Michael F. Bennet  
United States Senator



Tammy Duckworth  
United States Senator



Cory Gardner  
United States Senator