



**JUL 26 2016**

Mr. William Winkowski  
President  
Medtech College  
6612 E. 75<sup>th</sup> Street  
Suite 200  
Indianapolis, IN 46250

Sent Via UPS  
Tracking #:1ZA879640191695878

Re: Denial of Recertification Application to Participate in the Federal Student Financial Assistance Programs – Medtech College, 6565 Arlington Boulevard, Falls Church, VA 22042; OPE-ID: 02588900.

Dear Mr. Winkowski:

The U.S. Department of Education (Department) has reviewed Medtech College's (Medtech's) application for recertification to continue to participate in the student financial assistance programs authorized pursuant to Title IV of the Higher Education Act of 1965, as amended, 20 U.S.C. §§ 1070 *et seq.* ("Title IV programs"). Medtech's most recent Program Participation Agreement ("PPA") expired on September 30, 2015. Medtech, however, timely submitted its recertification application prior to that date. As a result, the Department extended Medtech's PPA on a month-to-month basis while evaluating the application and related matters. See 34 C.F.R. § 668.13(b)(2).

For purposes of evaluating a recertification application, the Department reviews an institution's performance during the operation of its previous PPA. The Department must ensure that an institution applying for participation in the Title IV programs has met the standards of administrative capability, has complied with Title IV program requirements, and has operated under the high standards of care, trust, and diligence required of a fiduciary. In reaching a decision on Medtech's recertification application, the Department reviewed all materials submitted by Medtech in support of its application. In addition, the Department reviewed materials it obtained during its review of Medtech, including documentation acquired during an assessment of Medtech's job placement rate reporting (the Department's Assessment). A report containing the findings of the Department's Assessment as to Medtech's placement rate reporting encompassing students completing programs between January 1, 2013 and December 31, 2013 is attached to this letter as the Enclosure and incorporated by reference herein.

**Federal Student Aid**

An Office of the U.S. Department of Education

Administrative Actions and Appeals Service Group

830 First St., N.E. Washington, D.C. 20002-8019

StudentAid.gov

The Department's Assessment revealed that (1) Medtech significantly overstated the job placement rates it reported to its institutional accreditor in its 2014 Annual Report, (2) Medtech significantly overstated the job placement rates it disclosed to the Department and the public through its Gainful Employment disclosures, (3) Medtech made numerous misrepresentations as to the job placement of individual students, and (4) Medtech contracted with a third-party placement rate verifier and failed to report that contractual arrangement in direct contravention of the Department's regulations. Medtech has failed to adhere to a fiduciary standard of conduct and failed to meet its responsibilities to the Department and its students. Consequently, its application for recertification is denied.

As a result of this denial of its recertification application, effective July 31, 2016, Medtech will no longer be eligible to participate in any Title IV programs. *See* 34 C.F.R. § 668.13(b)(2). Specifically, this includes: Federal Pell Grant (Pell Grant), Federal Supplemental Educational Opportunity Grant (FSEOG), Iraq and Afghanistan Service Grants (IASG), Teacher Education Assistance for College and Higher Education (TEACH) Grant, Federal Work-Study (FWS), Federal Perkins Loan (Perkins Loan), and William D. Ford Federal Direct Loan (Direct Loan). The Direct Loan program includes the Federal Direct Stafford/Ford Loan Program, the Federal Direct Unsubsidized Stafford/Ford Loan program, and the Federal Direct PLUS Program. The FSEOG, FWS, and Perkins Loan programs are known as campus-based programs.

**I. MEDTECH DEMONSTRATED A LACK OF ADMINISTRATIVE CAPABILITY AND BREACHED ITS FIDUCIARY DUTY TO THE DEPARTMENT BY MAKING NUMEROUS MISREPRESENTATIONS TO ITS ACCREDITOR, TO THE DEPARTMENT, AND TO THE PUBLIC REGARDING THE CAREER OUTCOMES OF ITS GRADUATES.**

On November 16, 2012, Medtech executed its most recent PPA with the Department, which stated that Medtech would comply with all Title IV, HEA program requirements, as well as any conditions specified by the Department in the PPA. *See generally*, 20 U.S.C. § 1094(a)(1); 34 C.F.R. § 668.14. By entering into a PPA with the Department, Medtech and its officers accepted the responsibility to act as fiduciaries in the administration of the Title IV programs. As fiduciaries, the institution and officers are subject to the highest standard of care and diligence in administering the Title IV programs and in accounting to the Secretary for the funds received. 34 C.F.R. § 668.82(a), (b).

In order to meet its responsibilities to the Department, an institution must be capable of adequately administering the Title IV programs. In this regard, an institution must comply with all Title IV statutory and regulatory requirements. 34 C.F.R. § 668.16(a). This includes maintaining accurate and complete records supporting its compliance with all Title IV requirements. *See* 34 C.F.R. §§ 668.16(d), 668.24. An institution's maintenance and submission of accurate records is critical to the Department's oversight responsibilities. The Department relies on those records when determining, among other things, student eligibility and compliance with institutional eligibility requirements.

A denial of an institution's recertification application is warranted if the Department determines that an institution does not meet all requirements and standards set forth in Title IV and regulations issued thereunder. 34 C.F.R. § 668.13. Medtech falls short of meeting those standards.

The Department may deny participation applications made by institutions when it determines that the institution has engaged in a substantial misrepresentation. 34 C.F.R. § 668.71(a)(3). A "misrepresentation" is

any false, erroneous or misleading statement an eligible institution, one of its representatives, or any ineligible institution, organization, or person with whom the eligible institution has an agreement to provide educational programs, or to provide marketing, advertising, recruiting or admissions services makes directly or indirectly to a student, prospective student or any member of the public, or to an accrediting agency, to a State agency, or to the Secretary. A misleading statement includes any statement that has the likelihood or tendency to deceive. A statement is any communication made in writing, visually, orally, or through other means. Misrepresentation includes the dissemination of a student endorsement or testimonial that a student gives either under duress or because the institution required the student to make such an endorsement or testimonial to participate in a program.

34 C.F.R. §668.71(c).

A "substantial misrepresentation," is "any misrepresentation on which the person to whom it was made could reasonably be expected to rely, or has reasonably relied, to that person's detriment." *Id.*

Each substantial misrepresentation is a sufficient ground for the Department to deny Medtech's recertification application.

**A. Medtech made numerous substantial misrepresentations involving its job placements to its accreditor, to the Department, to its students, and to the public**

**1. Placement Misrepresentations to the Council on Occupational Education**

Medtech's institutional accreditor is the Council on Occupational Education (COE). On April 13, 2015, pursuant to COE's requirements, Medtech submitted to COE a "2014 Annual Report" ("the Annual Report"). For each of Medtech's programs, the Annual Report included a "Total Placement Rate." Specifically, the Annual Report stated, (1) the number of "Graduate Completers" and "Non-Graduate Completers"<sup>1</sup> (collectively, "Total Completers") (2) the

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<sup>1</sup> COE defined this category as "The total number of students who left a program before graduation but have acquired sufficient competencies for employment in the field of instruction or related field as evidenced by such employment." Medtech only reported two such individuals, both in the Silver Spring Medical Billing and Coding program.

purported numbers of Graduate Completers Waiting to Take a Licensure Exam, Graduate Completers Unavailable for Employment<sup>2</sup>, and Graduate Completers Who Refused Employment<sup>3</sup> (collectively, “Waivers”), and (3) the purported number of Total Completers Employed in Positions Related to Field of Instruction<sup>4</sup> (“Completers Employed”). By subtracting the number of Waivers from the number of Total Completers, dividing the number of Completers Employed by that number, and then multiplying by 100, Medtech calculated and reported to COE a purported “Total Placement Rate” for each program. Medtech reported those numbers and rates for students who completed a program between January 1, 2013 and December 31, 2013.

As part of the Department’s Assessment, the Department engaged Deva & Associates, P.C. (“Deva”), to perform agreed-upon procedures to assess Medtech’s compliance with placement rate reporting requirements. The Department obtained the Annual Report and a list of those students Medtech considered to be Completers Employed and Waivers, along with contact information and employment data for those students, from Medtech for four programs: the Falls Church, Virginia Medical Assistant (Diploma) Program, the Silver Spring, Maryland Medical Assisting Program, the Silver Spring, Maryland Medical Billing and Coding Program, and the Washington, DC Medical Assistant Program (collectively, the “Programs”).

The Programs comprise a majority of each campus’s enrollment. In the Annual Report, Medtech stated that the Falls Church Medical Assistant (Diploma) program represented 183 of 288 Total Completers at that campus, the Silver Spring Medical Assisting and Medical Billing and Coding Programs collectively represented 281 of that campus’s 429 Total Completers, and the Washington, DC Medical Assistant (Degree) program represented all 35 of that campus’s Total Completers.

From the population of Total Completers for each of the Programs, Deva generated a random sample (with sample sizes based on the statistical concepts of 90% confidence and 5% precision)<sup>5</sup> and made contact with completers and reported employers from that sample. Deva made contact with a sufficient number of completers and employers to project the extent of non-compliance and the error rates for the placement rates Medtech reported. Using the projected error rates, Deva extrapolated the number of placed and waiver students and recalculated the program’s placement rate.

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<sup>2</sup> COE defined this category as “The number of graduate completers documented to be unavailable for employment because of situations such as pregnancy, other serious health-related issues, caring for ill family members, death, etc.”

<sup>3</sup> COE defined this category as “The number of graduate completers for whom the institution has documented evidence that the completers failed to keep interview appointments, enrolled in the program of instruction strictly for personal use, or simply refused an employment offer in the field of instruction.”

<sup>4</sup> COE defined this as “Graduates who (1) are employed in the field of instruction pursued, (2) have entered the military, or (3) are continuing their education” plus non-graduate completers.

<sup>5</sup> “Confidence” and “Precision” are statistical terms of art. As used herein, the terms mean that the Department’s Assessment included sufficient sampling to determine compliance or non-compliance with 90% confidence that the identified error rates are within five percentage points of the true error rate.



With respect to completers, Deva made telephonic contact using the contact information provided by Medtech. With respect to employers, Deva made telephonic contact and often followed up with a written request via facsimile. Deva followed a similar procedure for students Medtech considered to be Waivers. Deva then combined the results of the placement and waiver validation to analyze the institution's overall compliance with reporting requirements.

**a. Placement Rate Analysis**

Deva's methodology was conservative, including its interpretation of COE's guidelines, which Deva relied upon in determining what constituted a Completer Placed and a Waiver, even when this conservative approach led to seemingly-incongruous outcomes. For example, Medtech reported one completer as placed when that completer had a job prior to entering the program, kept that same job after completing the program, and apparently derived no pecuniary benefit from the course of study. Nevertheless, Deva counted the completer as a placement.<sup>6</sup> Moreover, in three cases, former students and putative employers reported different data to Deva. In two of those cases, the employer reported that Medtech's reported placement was false, while the student reported that the placement was correct. In the third case, Deva found the reverse. Deva used none of those three cases in making its determinations, in computing error rates, or in recalculating placement rates.

The Total Placement Rates Medtech reported to COE for each of the tested programs were overstated and therefore constitute substantial misrepresentations. Medtech reported a Total Placement Rate of 73% for each of the Falls Church Medical Assisting Program, the Silver Spring Medical Assisting Program, and the Silver Spring Medical Billing and Coding Program. Medtech asserted a Total Placement Rate of 70% for the Washington, DC Medical Assistant Program. Each of these reported rates were at or barely above the threshold required to avoid potential COE sanctions, which was 70%.

In contrast, the extrapolated Total Placement Rates calculated by Deva were: approximately 56% for the Falls Church Medical Assisting Diploma Program, approximately 54% for the Silver Spring Medical Assisting Program, approximately 49% for the Silver Spring Medical Billing and Coding Program, and approximately 35% for the Washington, DC Medical Assisting Program.

The Annual Report also contained various substantial misrepresentations upon which the four Total Placement Rate misrepresentations are predicated.

**b. Misrepresentations in the Falls Church, Virginia Medical Assistant Diploma Program**

Medtech reported to COE 183 Total Completers, 115 Completers Employed, and 26 Waivers. Out of 28 unduplicated contacts<sup>7</sup> with former students and putative employers, the Department's

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<sup>6</sup> In fact, neither students nor the Department would reasonably view such a student to have been placed as a result of their education.

<sup>7</sup> As used herein, an "unduplicated contact" means that if in the course of the Department's Assessment the Department made contact with the student and the student's putative employer, those contacts together were only

Assessment revealed six individual instances in which Medtech reported a student as a Completer Employed when in fact that student was not employed as claimed<sup>8</sup>. Likewise, out of six contacts with Falls Church students that Medtech represented as a proper Waiver, one was not. In that student's case, Medtech reported that the student refused placement assistance, but both the student and the school's own documentation belie that assertion. Medtech kept on file a "Placement Assistance Waiver Form" the student purportedly signed on August 1, 2013.

Assuming *arguendo* the student actually signed that form (the student has no recollection of doing so and says she was not on campus graduation day, the day of the putative signing), the form states that she would be available to resume her job search in September 2013. Medtech promised on this form that "[i]f/when you are ready to continue your job search efforts and would like Career Services placement assistance, please contact your campus Career Services department immediately, and we will be more than happy to assist you in your endeavors!" However, the student reported that despite seeking the assistance of Medtech's career services, the school failed to assist with her job search and does not return her telephone calls. Nevertheless, Medtech reported this student as a Waiver.

**c. Misrepresentations in the Silver Spring, Maryland Medical Assisting and Medical Billing and Coding Programs**

For its Silver Spring campus's Medical Assisting program, Medtech reported to COE 234 Total Completers, 146 Completers Employed, and 33 Waivers. The Department's Assessment into this program made contact with 27 unduplicated student and putative employer contacts from the pool of those students Medtech counted as placed. Of those, five indicated that Medtech's reported placement was incorrect. The Department also spoke to seven students from this program that Medtech reported to COE as Waivers. Of those, four students - a majority - reported that the waivers were not valid. Likewise, for the Silver Spring campus's Medical Billing and Coding program, Medtech reported to COE 47 Total Completers, 19 Completers Employed, and 21 Waivers. The Department made contact with seven unduplicated student and putative employer contacts from the pool of those students Medtech counted as placed and found one student whose purported placement was wholly unsupportable. That student only "worked" as an unpaid extern for one day, and was not employed on the day Medtech reportedly verified the employment. The Department also interviewed nine students from this program whom Medtech counted as Waivers. Of those, three were invalid.

**d. Misrepresentation in the Washington, DC Medical Assisting Program**

Finally, at Medtech's Washington, DC campus, Medtech reported to COE 35 Total Completers, 21 Completers Employed, and five Waivers. The Department's Assessment into this program made contact with 10 unduplicated student and putative employer contacts from the pool of those students Medtech counted as placed. Of those, five indicated that Medtech's reported placement

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considered once. Moreover, if the Department received inconsistent data (i.e., the student confirmed Medtech's reported placement while the employer denied it, or vice-versa), then that contact was not considered invalid for the purpose of the placement analysis.

<sup>8</sup> Summary charts of the unduplicated contacts for allegedly placed students and Waiver students may be found at pages 17 and 18 of the Enclosure.

was incorrect. In addition, the Department spoke to two students from this program whom Medtech reported to COE as Waivers. Of those, one waiver was not valid.

**e. Misrepresentation Trends and Common Issues**

The Department's Assessment uncovered a problematic trend common to each of the Programs. For at least eight of the 72 unduplicated contacts, what Medtech improperly represented to be a job placement was in fact a short-term, unpaid externship that should not have been counted. Medtech mandated those externships as a graduation requirement and was aware of their short-term nature. Nevertheless, in those eight cases, Medtech reported the student as placed on the basis of the externship.<sup>9</sup>

During its assessment, the Department also discovered that Medtech reported at least 13 students as Waivers based upon all of them allegedly missing an interview supposedly set with the same employer on the same day. Specifically, Medtech reported 13 students who allegedly had an interview scheduled with America's Best – a chain of eyeglasses shops – on November 5, 2014. The 13 students were drawn from both the Medical Billing and Coding program and the Medical Assisting program at the Silver Spring, Maryland campus. The Director of Career Services (the Director), asserted that all 13 students were no shows to the "interview," and reported each to COE as a Waiver. The Director signed each of the 13 "Placement Refusal Forms" on November 6, 2014, the day after the alleged "interview."

Before addressing the results of the student interviews arising from these purported Waivers, the Department notes several inconsistencies on the face of the Placement Refusal Forms. First, the position the students supposedly were to interview for was "Front Desk Receptionist" with the job responsibilities of "[a]nswering the telephones, setting medical appointments, filing, recording patient information in the [sic], HIPPA [sic], [and] collection of copays and insurance verifications." It is unlikely that such a position could be considered in-field for students who paid significant sums in tuition for a Medical Assisting or Medical Billing and Coding diploma. Second, the Placement Refusal Forms show that the students' graduation dates were as early as 18 months prior to the purported interview, and that none of the graduation dates were more recent than 11 months prior to the "interview" date. COE allows a school to consider a student a Waiver when documentation shows that the student "failed to keep interview *appointments*..." [emphasis added], not when the school merely alleges that a student failed to keep a single interview appointment 11-18 months after graduation. Finally, in striking contrast to other "Placement Refusal Forms" used by the school, these forms do not have a place for the student's signature, and in fact are not signed by the student. This single, inconsistent "Placement Waiver Form" was all of the waiver-supporting documentation in the students' files.

The Department was able to speak to nine of the thirteen students in the sample who were the subject of these Placement Refusal Forms. Of those, seven had never heard of America's Best. The Department also spoke to the contact at America's Best listed on the Placement Refusal

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<sup>9</sup> These eight cases are part of, and not in addition to, the 17 total invalid replacements discussed *infra*. In several other cases, students who were externs later became employed at their externship site. In those cases, the Department's Assessment considered the student to be placed.

Form. That individual had no recollection of scheduling thirteen Medtech student interviews on November 5, 2014. The individual hypothesized that that date might have been a job fair he was scheduled to attend on behalf of America's Best, but that job fairs were not interviews, and that at a job fair, at most, he might have accepted resumes from interested students to possibly follow-up with at a later date.

**f. Misrepresentation to COE based upon individual student files**

COE's standards stress that an institution must not only submit job placement data, but that such data must be "accurate and verifiable." *COE Handbook of Accreditation*, Standard V, Criterion III. COE reports to the Department that it relies on the accuracy of that data when it samples student-level files and data on its campus visits, as its standards require. COE conducted such a visit to Medtech between October 13<sup>th</sup> and 16<sup>th</sup>, 2014. The *Visiting Team Report* from that visit indicates that COE reviewed the files of individual students who were reported as placed. *COE Visiting Team Report 2014*. In addition to the misrepresentations as to job placement rate and the absolute numbers of completers placed, because COE relies upon maintenance of accurate and verifiable student-by-student files and data and reviews those items on-site reviews, it could reasonably be expected to rely upon the misrepresentations contained in those records in exercising its jurisdiction over Medtech.

COE could reasonably be expected to rely on all of these misrepresentations in exercising its jurisdiction over Medtech. For example, to maintain its recognition from the Department, COE "must demonstrate that it has standards for accreditation... that are sufficiently rigorous to ensure that the agency is a reliable authority regarding the quality of the education or training provided by the institutions or programs it accredits." 34 C.F.R. § 602.16(a). COE will meet this standard if its "accreditation standards effectively address the quality of the institution" in a number of areas, including "success with respect to student achievement... including, as appropriate, consideration of State licensing examinations, course completion, and *job placement rates*" *Id.* (emphasis added). Moreover, "the agency must have effective mechanisms for evaluating an institution's... compliance with the agency's standards." 34 C.F.R. § 602.17(a). COE may meet this requirement by, *inter alia*, "conduct[ing] at least one one-site review of the institution... during which it obtains sufficient information to determine if the institution... complies with [COE's] standards" *Id.* Each of the four overstatements of a program's Total Placement Rate constitutes a substantial misrepresentation, as does each report of the number of Completers Placed and each report of the number of Waivers. Moreover, Medtech maintained files which substantially misrepresented the outcomes of 17 allegedly placed students and nine allegedly waived students.

**2. Placement Misrepresentations to the Department, to students, to prospective students, and to the public**

Pursuant to the Department's Gainful Employment (GE) regulations at 34 C.F.R. §§ 668.6(b)(1)(iv), 668.41(d)(5), and 668.412, Medtech published online a Gainful Employment Disclosure Template ("GE Template") for each of the Programs. The Department's regulations require the GE Templates to be posted online and made available to prospective and enrolling



students. 34 C.F.R. §§ 668.412(c), (d), and (e). Medtech's online GE Templates are available to the public through publicly-accessible web pages. Because the Department requires programs receiving Title IV aid to report the information contained in the GE Templates, misrepresentations in the GE Templates also constitute misrepresentations to the Department, as well as violations of GE disclosure requirements.

The rates reported on each of the Program's GE Templates mirror the rates Medtech reported to COE. As explained *supra*, each of those rates overstated the respective program's true placement rate. Members of the public, including prospective students, could reasonably rely upon the false data shown in the GE Templates to decide whether to enroll at Medtech. Likewise, current students could reasonably rely upon that false data to decide whether to continue their enrollment at Medtech, and the Department could reasonably rely upon it in a number of ways, including determining whether Medtech was in compliance with state agency and accreditor requirements and in deciding whether to conduct program reviews. Therefore, each of the placement rate misrepresentations on the four GE Templates constitutes a substantial misrepresentation to the public, to prospective students, to current students, and to the Department.

**II. MEDTECH'S VIOLATION OF THIRD PARTY SERVICER REPORTING REQUIREMENTS IS A BREACH OF ITS FIDUCIARY DUTY TO THE DEPARTMENT AND DEMONSTRATES A LACK OF ADMINISTRATIVE CAPABILITY**

As part of its Assessment, the Department found that Medtech contracted with Placement Verifiers, LLC (Placement Verifiers) to verify placement of its completers. The contract between Medtech and Placement Verifiers (the Contract) is dated December 6, 2013. Some of the reported job placements and Waivers analyzed as part of the Department's Assessment were allegedly verified by Placement Verifiers, while Medtech allegedly verified others using its own staff.

A "third-party servicer" includes an entity that "conducts[s] activities required by the provisions governing student consumer information services in subpart D of [34 C.F.R. Part 668]." 34 C.F.R. § 668.2. Included among the Subpart D reporting requirements are job placement rates. 34 C.F.R. § 668.41(d)(5). Because Medtech used Placement Verifiers as a third-party servicer, Medtech should have reported its use of Placement Verifiers to the Department, and the Contract should have contained a number of provisions to protect the Department from fraud. 34 C.F.R. § 668.25. Medtech never reported the arrangement to the Department, and the Contract contained none of the required protections. Notably, had the Contract contained the language required by 34 C.F.R. § 668.25, Placement Verifiers would have been required to report to the Department "any information indicating there is reasonable cause to believe that the institution might have engaged in fraud..." 34 C.F.R. § 668.25(c)(2).

Instead of containing these safeguards, Medtech chose to enter into a contract that actually paid Placement Verifiers per "verification." Placement Verifiers was therefore incentivized to report more verifications, which in turn allowed Medtech to report more "placements" and higher job

placement rates. The regulatory violations arising out of the Contract, therefore, are not merely technical infractions. "To begin and to continue to participate in any Title IV program, an institution shall demonstrate to the Secretary that the institution is capable of adequately administering that program under each of the standards established in this section." 34 C.F.R. §668.16. Factors the Department considers in determining whether an institution is capable of adequately administering Title IV programs include (1) whether the institution "[a]dministers the Title IV programs in accordance with all statutory provisions of or applicable to Title IV of the HEA [and] all applicable regulatory provisions prescribed under that statutory authority..." (34 C.F.R. § 668.16(a)); (2) the use (or misuse) of third-party servicers in determining whether the institution used an "adequate number of qualified persons to administer" its Title IV programs (34 C.F.R. § 668.16(b)(2)(vii)); and (3) whether the institution "[a]dministers Title IV programs with adequate checks and balances in its system of internal controls" (34 C.F.R. § 668.16(c)(1)).

Here, Medtech's contract with Placement Verifiers was entered into in violation of the regulatory provisions outlined above, it constitutes a misuse of third party servicers which in turn evidences a paucity of qualified persons to administer Title IV programs, and by its very terms it shows a troubling disregard for the checks and balances required in 34 C.F.R. § 668.25 and elsewhere to correctly administer a taxpayer-funded program. In sum, in addition to constituting a breach of the fiduciary duty Medtech owes the Department, the arrangement between Medtech and Placement Verifiers evidences Medtech's lack of administrative capability to administer Title IV programs.

Should Medtech have factual evidence to dispute the Department's findings and demonstrate their inaccuracy, Medtech may submit that evidence via overnight mail to me at the following address:

Administrative Actions and Appeals Service Group  
U.S. Department of Education  
Federal Student Aid/Program Compliance  
830 First Street, NE (UCP-3, Room 84F2)  
Washington, DC 20002-8019

If any such material is received by **August 5, 2016** it will be reviewed and Medtech will be notified if the recertification denial will be modified, rescinded, or left in place. If Medtech does not submit such material by that date, the denial of recertification will be effective July 31, 2016. The Multi-Regional and Foreign School Participation Division will then contact you concerning the proper procedures for closing out Medtech's Title IV program accounts.

*Mr. William Winkowski*  
*Medtech College*  
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In the event that Medtech submits an application to participate in the Title IV, HEA programs in the future, that application must address the deficiencies noted in this letter. If you have any questions about this letter, you may contact Kerry O'Brien at 303-844-3319.

Sincerely,

A black rectangular box redacting the signature of Susan D. Crim.

Susan D. Crim  
Director  
Administrative Actions and Appeals Service Group

Enclosure

cc: Dr. Gary Puckett, Executive Director, COE, via [puckettg@council.org](mailto:puckettg@council.org)  
DC Education Licensure Commission via [angela.lee@dc.gov](mailto:angela.lee@dc.gov)  
MD Higher Education Commission via [jennie.hunter-cevera@maryland.gov](mailto:jennie.hunter-cevera@maryland.gov)  
VA State Council for Higher Education via [peterblake@schev.edu](mailto:peterblake@schev.edu)  
Department of Defense, via [osd.pentagon.ousd-p-r.mbx.vol-edu-compliance@mail.mil](mailto:osd.pentagon.ousd-p-r.mbx.vol-edu-compliance@mail.mil)  
Department of Veteran Affairs, via [INCOMING.VBAVACO@va.gov](mailto:INCOMING.VBAVACO@va.gov)  
Consumer Financial Protection Bureau, via [CFPB\\_ENF\\_Students@cfpb.gov](mailto:CFPB_ENF_Students@cfpb.gov)