

ITT Technical Institute Borrower Defense Executive Summary Nursing Accreditation Representations

Pursuant to 34 C.F.R. §685.222(e)(3), the Department of Education (“Department”) is charged with conducting a fact-finding process to determine whether each borrower defense application states a basis for a borrower defense. In adjudicating each individual borrower defense application, the Department must consider not only the borrower’s application and accompanying evidence, but also any relevant information in records in the possession of the Department and in submissions from the school, as well as any other information obtained in connection with the fact-finding process.

The Borrower Defense Group (“BDG”) has completed a review of the evidence within the Department’s possession relating to ITT Technical Institute (“ITT”) as it relates to the misrepresentation of its programmatic accreditation status for its associate degree in nursing program (“ITT Nursing Accreditation Claims”).

ITT operated its associate degree in nursing program (“ADN program”) at campuses throughout the United States and, at its height in 2012, it offered the ADN program at forty-seven campuses across twenty-three states. To date, the Department has received over a thousand borrower defense applications relating to ITT’s ADN program.

Applying a preponderance of the evidence standard, BDG has prepared a series of summaries of the evidence relating to ITT. Together, these summaries form a common statement of facts that will be applied in the individual adjudication of borrower defense applications from ITT borrowers that are adjudicated pursuant to 34 C.F.R. §685.206(c), 685.206(d), and/or 685.206(e) based on the dates of the loans relating to the borrowers’ claims.

ITT Made Widespread and Systematic Misrepresentations Regarding the Status of Programmatic Accreditation for Its Associate Degree in Nursing Program

This section discusses several ways that ITT misrepresented the programmatic accreditation of its ADN program. The evidence in BDG’s possession relating to this conduct establishes by a preponderance of the evidence that:

- None of ITT’s campuses offering its ADN program ever held programmatic accreditation.
- Nevertheless, between July 2007 and September 2016, ITT mischaracterized their programmatic accreditation status by promising students that the ADN program would be accredited within a specific timeframe and/or telling students that the ADN program was already accredited.
- Between July 2007 and September 2016, ITT’s misrepresentations were consistent over time and across all campuses offering the ADN program.