



DEC 10 2021

Dr. Mikhail Brodsky  
President  
Lincoln University  
401 15th Street  
Oakland, CA 94612

Sent via UPS  
Tracking # 1Z37X7Y30196028767

Re: Denial of Application for Recertification to Participate in the Federal Student Financial Assistance Programs  
OPE ID: 00697500

Dear Dr. Brodsky:

The U.S. Department of Education ("Department") has reviewed Lincoln University's ("Lincoln's") September 29, 2021 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, HEA programs"). Lincoln's current Program Participation Agreement ("PPA") expires on December 31, 2021.

This notice is to inform you that the Department has denied Lincoln's application for continued participation, because Lincoln lost eligibility to participate in the Title IV, HEA programs effective March 15, 2021. With this denial of its recertification application, after the expiration of its current PPA Lincoln will not be able to continue participating in the following Title IV, HEA programs: Federal Pell Grant ("Pell Grant"), Federal Supplemental Educational Opportunity Grant ("FSEOG"), Iraq and Afghanistan Service Grants, 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.

The Department will also not approve any payment requests submitted under the Heightened Cash Monitoring II method of payment for periods after March 15, 2021, except for funds earned in accordance with 34 C.F.R. § 668.26. A separate letter will be issued to establish repayment liabilities for Title IV, HEA program funds Lincoln has disbursed after losing eligibility effective March 15, 2021, and Lincoln will have an opportunity to request an administrative appeal of that action.

The denial of the recertification application is based on Lincoln's March 15, 2021 voluntary withdrawal of its accreditation by the Accrediting Council for Independent Colleges and Schools

**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

("ACICS"), effective that date, while under a show-cause order. (Enclosure 1). Accreditation by a nationally recognized accrediting agency, such as ACICS, is one of the statutory requirements that an institution must meet in order to be eligible to participate in the programs authorized under Title IV of the HEA. 20 U.S.C. §§ 1001(a)(5), 1002(b)(1)(D), (c)(1)(B). ACICS was Lincoln's primary accreditor for purposes of its eligibility to participate in the Title IV, HEA programs. Although Lincoln is also accredited by the WASC Senior College and University Commission ("WSCUC"), Lincoln obtained approval to list WSCUC as its secondary accreditor in August 2020. Lincoln applied to the Department for WSCUC to be its primary accreditor after it had already relinquished its ACICS accreditation while under show-cause status, and the Department regulations prohibit a redesignation of primary accreditor under that circumstance. 34 C.F.R. §§ 600.11(a)(1)(ii)(B), (c)(2). Therefore, when Lincoln withdrew from its accreditation by ACICS, it became ineligible to participate in the Title IV, HEA programs, since it no longer met the definition of a Title IV-eligible institution.

Department regulations establish the date on which a loss of eligibility is effective. 34 C.F.R. § 600.40. As pertinent here, they provide that an institution loses its eligibility on the date that the institution fails to meet any of the eligibility requirements of 34 C.F.R. Part 600. 34 C.F.R. § 600.40(a)(1)(i). Thus, pursuant to 34 C.F.R. § 600.40(a)(1)(i), Lincoln's eligibility to participate in the Title IV, HEA programs ended on March 15, 2021, the effective date of its withdrawal from its ACICS accreditation.

An institution may not be considered Title IV-eligible for 24 months after it has withdrawn voluntarily from its accreditation status under a show-cause order issued by an accrediting agency, unless that agency rescinds its order. 34 C.F.R. § 600.11(c)(2). Due to Lincoln's withdrawal from its ACICS accreditation while under a show-cause order issued by ACICS, the Department will not entertain an application from Lincoln for reinstatement to participate in the Title IV, HEA programs before March 15, 2023.

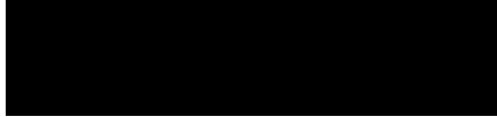
Should Lincoln have evidence to dispute the Department's findings, and demonstrate that, in fact, it did not withdraw from its accreditation by ACICS while under show cause, Lincoln must submit that evidence via overnight mail to me at the following address:

Administrative Actions and Appeals Service Group  
U.S. Department of Education  
Federal Student Aid/Partner Enforcement and Consumer Protection  
830 First Street, NE-UCP3, Room 84F2  
Washington, DC 20002-8019

If Lincoln chooses to submit material for the Department's consideration, it must be received within two weeks of the date of this letter. Any such material will be reviewed by the Department, and Lincoln will be notified whether the recertification denial will be modified, rescinded, or left in place. If the denial of recertification is left in place, the San Francisco/Seattle School Participation Division will then contact you concerning the proper procedures for closing out Lincoln's Title IV, HEA program accounts.

In the event that Lincoln submits an application to participate in the Title IV, HEA programs in the future, that application must address the deficiency noted in this letter. If you have any questions about this letter, you may contact Kathleen Hochhalter at 303-844-4520.

Sincerely,



Susan D. Crim  
Director  
Administrative Actions and Appeals Service Group

Enclosure

cc: Ms. Michelle Edwards, President and CEO, ACICS, via [medwards@acics.org](mailto:medwards@acics.org)  
Ms. Jamiene Studley, Present, WSCUC, via [jstudley@wscuc.org](mailto:jstudley@wscuc.org)  
Ms. Deborah Cochrane, Chief, California Bureau of Proprietary School Supervision, via  
[Deborah.Cochrane@dca.ca.gov](mailto:Deborah.Cochrane@dca.ca.gov)  
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)