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# CONNECTICUT: FINAL GRADING ANALYSIS

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OVERALL SCORE:  
**203.5 / 700 POINTS**  
22%  
LETTER GRADE: **F**

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## I. OVERSIGHT BODY: **5/100 POINTS**

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A. IS THERE A STATUTORILY CREATED OVERSIGHT BODY THAT IS  
PUBLICLY ACCOUNTABLE?

**0 / 60 POINTS**

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Element	Points Available	Type 1	Type 2	Points Awarded (Average)
Multi-Member Panel / Board created by statute	10	0	0	0
Board statutorily created specifically to oversee private postsecondary institutions	10	0	0	0
Board is the decision-maker ( <i>NOT</i> a single person – like the head of the department or director)	10	0	0	0
Board can engage in rule-making	10	0	0	0
Meetings must be open to the public	5	0	0	0
Must allow public comment	5	0	0	0
Board can initiate investigations	5	0	0	0
Board can impose penalties for violations.	5	0	0	0
<b>Total Points</b>	60	<b>0</b>	<b>0</b>	<b>0</b>

**Explanation:**

Connecticut has two categories of private for-profit postsecondary educational institutions.

***Type 1: Private occupational schools:***

Private occupational schools are “a person, board, association, partnership, corporation, limited liability company or other entity offering instruction in any form or manner in any trade, industrial,

commercial, service, professional or other occupation for any remuneration, consideration, reward or promise of whatever nature, except “private occupational school” shall not include (A) instruction offered under public supervision and control; (B) instruction conducted by a firm or organization solely for the training of its own employees or members; or (C) instruction offered by a school authorized by the General Assembly to confer degrees.” **Conn. Gen. Stat. § 10a-22a**

The Connecticut Office of Higher Education, specifically the executive director of the Office of Higher Education has authority to issue certificate authorizing the private occupational schools to offer occupational instruction in Connecticut. **Conn. Gen. Stat. § 10a-22b; Regs., Conn. State Agencies § 10a-34-1** The Office of Higher Education (**Conn. Gen. Stat. § 10a-1d**) is not a public board, and the executive director is ultimately responsible for decision-making. Because this structure does not allow for sufficient public access, input, and transparency, Connecticut loses points for the related elements above. The Connecticut Office of Higher Education is responsible for oversight and regulation of private occupational schools, as well as a number of other categories of postsecondary institutions. Connecticut has not created a board or commission specifically tasked with oversight of private for-profit postsecondary educational institutions.

The Office of Higher Education has the authority to adopt regulations (**Conn. Gen. Stat. § 10a-22k**), and the executive director of the office of higher education has authority to initiate investigations (**Conn. Gen. Stat. § 10a-22o(b)**) and to assess and assess any entity that violates applicable provisions of Connecticut statute or regulation and impose penalties. **Conn. Gen. Stat. § 10a-22f; Conn. Gen. Stat. § 10a-22i** However, Connecticut receives no credit here because these functions are not performed by a public board with the increased transparency and public input that structure would provide.

***Type 2: Private degree-granting schools***

Private degree-granting schools are “institutions of higher education” - any person, school, board, association, limited liability company or corporation which is licensed or accredited to offer one or more programs of higher learning leading to one or more degrees. The Office of higher education is responsible for establishing regulations, initiating and conducting investigations, **Conn. Gen. Stat. § 10a-34; Conn. Gen. Stat. § 10a-34c; Conn. Gen. Stat. § 10a-34e; Conn. Gen. Stat. § 10a-34f**

**B. STATUTE-SPECIFIED MEMBERSHIP:**

**1. TO WHAT EXTENT ARE LIMITATIONS PLACED ON FOR-PROFIT MEMBERSHIP ON THE OVERSIGHT BODY?**

**0/ 25 POINTS\***

*\*The points for Type 1 and Type 2 institutions have been averaged for the final score for this element.*

	Explicit Prohibition on For-Profit majority + No possibility of a majority of the quorum	Explicit Prohibition on For-Profit Majority	Discouraged	No prohibition Specified, but not discouraged	For Profit Majority Mandated
<b>Type 1:</b>	25 Points	20 Points	10 Points	<b>0 Points</b>	-5 Points
<b>Type 2:</b>	25 Points	20 Points	10 Points	<b>0 Points</b>	-5 Points

**Explanation:**

***Type 1: Private occupational schools:***

The Office of Higher Education is not a board. Thus, there are no prohibitions placed on for-profit influence in the agency nor is a for-profit influence mandated in any way.

***Type 2: Degree-granting schools:***

The Office of Higher Education is not a board. Thus, there are no prohibitions placed on for-profit influence in the agency nor is a for-profit influence mandated in any way.

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2. IS THE OVERSIGHT BODY IS MANDATED TO INCLUDE AT LEAST ONE CONSUMER ADVOCATE?

**0/10 POINTS\***

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*\*The points for Type 1 and Type 2 institutions have been averaged for the final score for this element.*

	Yes	No
Type 1:	10 Points	0 Points
Type 2:	10 Points	0 Points

**Explanation:**

***Type 1: Private occupational schools:***

The Office of Higher Education is not a board. While the mission of the office is to provide consumer protection for students and potential students at private occupational schools, hospital-based schools and barber/hairdresser schools in Connecticut, there is no requirement that the Office take steps to ensure the input of a consumer advocate (an individual with expertise and experience in the area of consumer advocacy) in the course of rule-making, oversight, and investigations.

***Type 2: Private degree-granting schools:***

The Office of Higher Education is not a board. While the mission of the office is to provide consumer protection for students and potential students at private occupational schools, hospital-based schools and barber/hairdresser schools in Connecticut, there is no requirement that the Office take steps to ensure the input of a consumer advocate (an individual with expertise and experience in the area of consumer advocacy) in the course of rule-making, oversight, and investigations.

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3. ARE THE MEMBERS APPOINTED BY A PUBLICLY ACCOUNTABLE OFFICIAL OR ELECTED IN A GENERAL ELECTION?

**5/5 POINTS\***

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*\*The points for Type 1 and Type 2 institutions have been averaged for the final score for this element.*

	All	Majority	Half	Minority	None
Type 1:	5 Points	3 Points	2.5 Points	1 Point	0 Points
Type 2:	5 Points	3 Points	2.5 Points	1 Point	0 Points

**Explanation:**

***Type 1: Private occupational schools:***

The governor appoints the executive director of the Office of Education.  
**Conn. Gen. Stat. § 10a-1d(b)**

**Type 2: Private degree-granting schools:**

The governor appoints the executive director of the Office of Education.  
**Conn. Gen. Stat. § 10a-1d(b)**

**II. STATE OVERSIGHT – EFFICACY: 25.75/100 POINTS**

**A. DOES THE STATE REQUIRE ONSITE REVIEW OF PRIVATE POSTSECONDARY INSTITUTIONS?  
 1.75/10 POINTS\***

*\*The points for Type 1 and Type 2 institutions have been averaged for the final score for this element.*

	Mandatory On-Site Reviews			Discretionary	None
	Every 2 years or less	Every 3-5 years	Over 5 years	Discretion to conduct Onsite Reviews	No Review Specified
<b>Type 1:</b>	10 Points	8 Points	<del>5 Points</del> 2.5 Points	3 Points	0 Points
<b>Type 2:</b>	10 Points	8 Points	5 Points	3 Points	<del>0 Points</del> 1 Point

**Explanation:**

**Type 1: Private occupational schools:**

Connecticut requires an onsite inspection of schools for purposes of initial authorization. The review is conducted by an evaluation team which consists of at least two members representing the Office of Higher Education, and at least one member for each of the areas of occupational instruction for which authorization is sought, with experience in the occupation. Note that the applicant school has the right to challenge any proposed member of the evaluation team upon showing good cause. **Conn. Gen. Stat. § 10a-22b(f),(g)** Connecticut receives 2.5 points for this element because the first visit is mandatory, but no on-site visits are mandated after a school's initial authorization, and there is no specified period of time for which discretionary on-site visits are provided.

**Type 2: Private degree-granting schools:**

Connecticut provides for onsite visits on a discretionary basis, dependent upon the type of degree-granting postsecondary institution, for initial licensure. Note that applicant institutions have an opportunity prior to the onsite visit to state objections regarding individuals identified in the list of evaluators who will be conducting the visit. While regulations allow for interim evaluations in some circumstances, Connecticut does not require regular onsite reviews, nor is there any indication of a timeframe in which discretionary on site reviews may occur. The state receives one point here because it allows for discretionary on site reviews as a condition for initial licensure.

**Regs., Conn. State Agencies § 10a-34-6**

**B. DOES THE STATE REQUIRE UNANNOUNCED INSPECTIONS FOR ONSITE REVIEWS?  
0/ 5 POINTS\***

*\*The points for Type 1 and Type 2 institutions have been averaged for the final score for this element.*

	<b>Required Unannounced Visits</b>	<b>Discretion to do Unannounced Visits</b>	<b>No indication</b>
<b>Type 1:</b>	5 Points	3 Points	<b>0 Points</b>
<b>Type 2:</b>	5 Points	3 Points	<b>0 Points</b>

**Explanation:**

***Type 1: Private occupational schools:***

Connecticut does not provide for unannounced onsite reviews.

***Type 2: Private degree-granting schools:***

Connecticut does not provide for unannounced onsite reviews. In fact, institutions are provided with opportunity to

**C. DOES THE STATE REQUIRE REGULAR REVIEWS OF PRIVATE POSTSECONDARY APPROVAL TO OPERATE?  
15.5/20 POINTS\***

*\*The points for Type 1 and Type 2 institutions have been averaged for the final score for this element.*

	<b>Mandatory</b>			<b>Discretionary</b>	<b>None</b>
	Every 2 years or less	Every 3-5 years	Over 5 years	Discretion to Conduct Reviews	No Review Specified
<b>Type 1:</b>	20 Points	<b>15 Points (+1 point)</b>	10 Points	5 Points	0 Points
<b>Type 2:</b>	20 Points	<b>15 Points</b>	10 Points	5 Points	0 Points

**Explanation:**

***Type 1: Private occupational schools:***

Connecticut requires a private occupational school that has been authorized for less than three years to renew its authorization annually. A private occupational school that has been authorized for at least three consecutive years may make application for renewal of authorization for a period of up to three years. Thus, Connecticut receives 15 points for this element plus one additional point because schools must renew authorization annually for the first three years.

***Type 2: Private degree-granting schools:***

No person, school, board, association or corporation shall confer any degree unless authorized by act of the General Assembly. **Conn. Gen. Stat. § 10a-34(c)** Connecticut provides that licensure of a new institution or program may be granted for a period not to exceed three years, thereafter renewable for periods not to exceed three years. **Regs., Conn. State Agencies § 10a-34-4(j)**

**D. DOES THE CRITERIA FOR RENEWAL OF AUTHORIZATION MANDATE A REVIEW OF FACTORS ESSENTIAL TO ACADEMIC AND ETHICAL INTEGRITY?**

**8.5/ 20 POINTS\***

*\*The points for Type 1 and Type 2 institutions have been averaged for the final score for this element.*

	All 8	7 of 8	6 of 8	5 of 8	4 of 8	3 of 8	2 of 8	1 of 8	0 of 8
<b>Type 1:</b>	20 Points	17.5 Points	15 Points	12.5 Points	10 Points	7.5 Points	<b>5 Points</b> <i>+2 points</i>	2.5 Points	0 Points
<b>Type 2:</b>	20 Points	17.5 Points	15 Points	12.5 Points	<b>10 Points</b> <i>+1 Point</i>	7.5 Points	5 Points	2.5 Points	0 Points

Element	Type 1:	Type 2:
<b>Admission Requirements</b>	<b>M</b>	<b>M</b>
<b>Graduation Requirements</b>	<b>D</b>	<b>M</b>
<b>Placement Rate</b>		
<b>Completion Rate (or Graduation Rate)</b>		
<b>Advertising Practices</b>	<b>M</b>	<b>M</b>
<b>Cohort Default Rate</b>		
<b>Accreditation Status</b>		<b>M</b>
<b>Financial Aid Policies</b>	<b>D</b>	<b>D</b>

*M=Mandatory; D=Discretionary*

**Explanation:**

***Type 1: Private occupational schools:***

Among several conditions it requires schools meet in order to renew authorization, Connecticut includes the following relevant elements for review in its minimum requirements: Admission requirements, advertising, an enrollment agreement which complies with specified requirements, and a catalog which complies with specified requirements. The enrollment agreement must include the time required to complete a program, class schedule, start and end dates and it must specify the type of document to be received upon the successful completion of a course or program. The catalog must specify graduation requirements. Because the enrollment agreement and the catalog must comply with the law, each contains information on graduation requirements, and both are reviewed as a part of the renewal process. Connecticut receives partial credit for requiring review of graduation requirements because the state does not expressly require review of graduation requirements, it requires review of specified documents to ensure that graduation requirements are included, but there is no mandate that the requirements themselves are reviewed beyond their inclusion.

***Type 2: Private degree-granting schools:***

Connecticut reviews, among several elements for initial licensure and renewal, the following: admission requirements **Regs., Conn. State Agencies § 10a-34-14**, graduation requirements **Regs., Conn. State Agencies § 10a-34-17**, advertising practices **Regs., Conn. State Agencies § 10a-34-20**, and accreditation status. Institutional catalogs are reviewed and catalogs must include institutional financial aid information, thus Connecticut receives partial credit for reviewing the

financial aid policies of degree-granting institutions as well. **Regs., Conn. State Agencies § 10a-34-20(a)**

**E. DOES THE STATE'S OVERSIGHT DISTINGUISH BETWEEN FOR-PROFITS AND NONPROFITS?**

**0/15 POINTS\***

*\*The points for Type 1 and Type 2 institutions have been averaged for the final score for this element.*

	<b>Yes, strongly distinguished</b>	<b>Yes, moderately distinguished</b>	<b>Yes, Slightly Distinguished</b>	<b>Not distinguished</b>
<b>Type 1:</b>	15 Points	10 Points	5 Points	<b>0 Points</b>
<b>Type 2:</b>	15 Points	10 Points	5 Points	<b>0 Points</b>

**Explanation:**

Connecticut does not distinguish between for-profit and nonprofit private postsecondary educational institutions.

**F. DOES THE STATE REQUIRE INCREASED OVERSIGHT/SCRUTINY OF PRIVATE POSTSECONDARY INSTITUTIONS BASED ON POOR PERFORMANCE?**

**0/10 POINTS\***

*\*The points for Type 1 and Type 2 institutions have been averaged for the final score for this element.*

	<b>Yes, Mandatory</b>	<b>Yes, Mandatory but Limited</b>	<b>Yes, Discretionary</b>	<b>Yes, Discretionary but Limited</b>	<b>No</b>
<b>Type 1:</b>	10 Points	7.5 Points	5 Points	2.5 Points	<b>0 Points</b>
<b>Type 2:</b>	10 Points	7.5 Points	5 Points	2.5 Points	<b>0 Points</b>

**Explanation:**

***Type 1: Private occupational school:***

The executive director may place a private occupational school which is out of compliance with the conditions of authorization and any applicable regulations of Connecticut state agencies on probation for a period not to exceed one year. If, after the period of one year of probationary status, the school remains out of compliance with the conditions of authorization, the executive director may revoke such school's certificate of authorization to operate as a private occupational school. However, there is nothing in the regulations that relates to the performance of schools (graduation rates, cohort default rates, job placement rates, and so on). Therefore, while this is a promising practice, Connecticut receives no points here because the increased scrutiny does not extend to schools which are performing poorly as reflected by student outcomes.

***Type 2: Private degree-granting school:***

Connecticut does not require increased oversight or scrutiny to schools with repeatedly poor performance outcomes.

G. DOES STATE LAW INCLUDE ANY SPECIAL PROTECTIONS FOR VETERANS WHO ATTEND PRIVATE POSTSECONDARY INSTITUTIONS?

**0/20 POINTS\***

*\*The points for Type 1 and Type 2 institutions have been averaged for the final score for this element.*

	Yes	No
<b>Type 1:</b>	10 Points	<b>0 Points</b>
<b>Type 2:</b>	10 Points	<b>0 Points</b>

**Explanation:**

**Type 1: Private occupational schools:**

There are no special protections in place specifically for veterans who attend private occupational schools.

**Type 2: Private degree-granting schools:**

There are no special protections in place specifically for veterans who attend private occupational schools.

III. STATE OVERSIGHT - SCOPE & INCLUSION:

**5/100 POINTS**

A. ARE EXEMPTIONS TO STATE OVERSIGHT COVERAGE LIMITED?

**5/100 POINTS**

*\*The points for Type 1 and Type 2 institutions have been averaged for the final score for this element.*

	No Exemptions	Few Exemptions	Moderate Exemptions	Heavy Exemptions
<b>Type 1:</b>	100 Points	75 Points	50 Points	<b>0 Points (+10 points)</b>
<b>Type 2:</b>	100 Points	75 Points	50 Points	<b>0 Points</b>

**Type 1: Private occupational schools**

“Except for initial authorizations, the executive director shall accept institutional accreditation by an accrediting agency recognized by the United States Department of Education, in satisfaction of the requirements of this section and section 10a-22d, including the evaluation and attendance requirement, unless the executive director finds reasonable cause not to rely upon such accreditation.” **Conn. Gen. Stat. § 10a-22b(b)**

Connecticut receives 10 points for private occupational schools because the initial authorization is not exempted due to accreditation by an accrediting agency recognized by the United States Department of Education.

**Type 2: Degree-granting schools**

Connecticut provides licensure and accreditation for degree-granting schools in the state and will provide exemptions from state accreditation to schools with regional accreditation in most circumstances. **Conn. State Agencies §§ 10a-34-4; 10-34-5**

Connecticut receives a “weak” rating for this element because of the large gap in oversight that may result from its exemption of institutional accreditation after initial authorization of private occupational schools.

**IV. DISCLOSURE REQUIREMENTS: 7.5/100 POINTS**

**A. ARE INSTITUTIONS REQUIRED TO DISCLOSE INSTITUTIONAL PERFORMANCE MEASURES TO POTENTIAL STUDENTS?**

**0/20 POINTS\***

*\*The points for Type 1 and Type 2 institutions have been averaged for the final score for this element.*

	<b>Yes, Mandatory</b>	<b>Yes, Discretionary</b>	<b>None</b>
	Fact sheet or equivalent required to be given to students:	Fact sheet or documents given to students upon request:	No Performance Fact Sheet required
<b>Type 1:</b>	20 Points	10 Points	<b>0 Points</b>
<b>Type 2:</b>	20 Points	10 Points	<b>0 Points</b>

**Explanation:**

**Type 1: Private occupational schools:**

Connecticut does not require private occupational schools to provide students with a fact sheet-type performance disclosures or to have fact-sheet type performance disclosures available upon request.

**Type 2: Private Degree-granting schools:**

Connecticut does not require private degree-granting schools to provide students with fact sheet-type performance disclosures or to have fact sheet-type performance disclosures available upon request.

**B. WHICH INSTITUTIONAL PERFORMANCE DISCLOSURES ARE REQUIRED TO BE GIVEN TO STUDENTS PRIOR TO ENROLLMENT?**

**0/60 POINTS\***

*\*The points for Type 1 and Type 2 institutions have been averaged for the final score for this element*

**Type 1: Private occupational schools:**

<b>Disclosures</b>	<b>Mandatory</b>	<b>Discretionary</b>	<b>Not Specified</b>
<b>Cohort Default Rate (CDR)</b>	10 Points	5 Points	<b>0 Points</b>
<b>Graduation / Completion</b>	10 Points	5 Points	<b>0 Points</b>

<b>Rates</b>			
<b>Placement Rates</b>	10 Points	5 Points	<b>0 Points</b>
<b>Wage Information</b>	10 Points	5 Points	<b>0 Points</b>
<b>License Exam Passage Rates</b>	10 Points	5 Points	<b>0 Points</b>
<b>Methods &amp; Sources used to Calculate</b>	10 Points	5 Points	<b>0 Points</b>

**Explanation:**

Connecticut does not require schools to provide any institutional performance disclosures to students prior to enrollment.

***Type 2: Private Degree-granting schools:***

<b>Disclosures</b>	<b>Mandatory</b>	<b>Discretionary</b>	<b>Not Specified</b>
<b>Cohort Default Rate (CDR)</b>	10 Points	5 Points	<b>0 Points</b>
<b>Graduation / Completion Rates</b>	10 Points	5 Points	<b>0 Points</b>
<b>Placement Rates</b>	10 Points	5 Points	<b>0 Points</b>
<b>Wage Information</b>	10 Points	5 Points	<b>0 Points</b>
<b>License Exam Passage Rates</b>	10 Points	5 Points	<b>0 Points</b>
<b>Methods &amp; Sources used to Calculate</b>	10 Points	5 Points	<b>0 Points</b>

**Explanation:**

Connecticut does not require schools to provide any institutional performance disclosures to students prior to enrollment.

**C. DOES THE STATE REQUIRE SCHOOLS TO INCLUDE ELEMENTS ESSENTIAL FOR STUDENTS TO MAKE AN INFORMED DECISION IN THE ENROLLMENT CONTRACT?**

**7.5/ 20 POINTS\***

*\*The points for Type 1 and Type 2 institutions have been averaged for the final score for this element*

***Type 1: Private occupational schools:***

<b>Element Description</b>	<b>Mandatory</b>	<b>Discretionary</b>	<b>Not Specified</b>
<b>Total Cost of Program</b>	<b>5 Points</b>	2.5 Points	0 Points
<b>Refund Information</b>	<b>5 Points</b>	2.5 Points	0 Points
<b>Transferability of Credits</b>	5 Points	2.5 Points	<b>0 Points</b>
<b>Length of Program</b>	<b>5 Points</b>	2.5 Points	0 Points

**Explanation:**

Connecticut requires private occupational schools provide information about time required to complete the programs as stated in the catalog; information about total costs (including tuition, books, supplies and other costs), method and terms of payment, and refund policy among several other requirements outlined in **Regs., Conn. State Agencies § 10a-22k-5(e)**. Connecticut does not,

however, require information about the transferability of credits to be included in the enrollment agreement.

**Type 2: Private Degree-granting schools:**

Element Description	Mandatory	Discretionary	Not Specified
Total Cost of Program	5 Points	2.5 Points	0 Points
Refund Information	5 Points	2.5 Points	0 Points
Transferability of Credits	5 Points	2.5 Points	0 Points
Length of Program	5 Points	2.5 Points	0 Points

**Explanation:**

Connecticut law and regulations do not specify any required elements for enrollment contracts for private degree-granting schools.

**V. REGULATION OF RECRUITING PRACTICES: 62.5/100 POINTS**

**A. HAS THE STATE PUT INTO LAW A LIST OF PROHIBITED ACTS REGARDING ADVERTISING AND RECRUITING?**

**62.5/100\***

*\*The points for Type 1 and Type 2 institutions have been averaged for the final score for this element*

	Yes, strong regulation	Yes, Moderate Regulation	Yes, weak regulation	No list of prohibited acts
Type 1	100 Points	75 Points	50 Points	0 Points
Type 2	100 Points	75 Points	50 Points	0 Points

**PROHIBITED ACTS**

Included in list of Prohibited Acts	Type 1	Type 2
Misleading representations using the word “college” or “university”	X	X
Misleading Institution Affiliations (re: military, public institution, business establishments...)	X	
Promise Employment	X	
Compensation for enrollment		
Compensation or “bounty” to recruiters		
Deception (Broad prohibition)	X	X
Misrepresentation (Broad Prohibition)	X	X
Misleading representations re: accreditation		

*1-3=Weak; 4-6=Moderate; 7+=Strong*

**Explanation:**

**Type 1: Private occupational schools:**

Connecticut regulations specify “Advertising for the school shall be under the complete and correct name and address of the school as listed on its certificate of authorization and shall conform to all requirements of the federal and state Unfair Trade Practices Acts.” The regulations further prohibit schools from using “blind,” “help wanted,” or employment columns for advertising. The regulations further prohibit schools from using misleading endorsements and prohibit schools from advertising that they operate under state supervision or are recommended by any agency of the state. **Regs., Conn. State Agencies § 10a-22k-5(h)** Finally, **Conn. Gen. Stat. § 10a-34(j)** is included in the laws governing degree-granting institutions, but would apply to private occupational schools as well.

No person, school, board, association or corporation shall use in any way the term “junior college” or “college” or “university” or use any other name, title, literature, catalogs, pamphlets or descriptive matter tending to designate that it is an institution of higher education, or that it may grant academic or professional degrees, unless the institution possesses a license from, or has been accredited by, the office...”

**Type 2: Private Degree-granting schools:**

Connecticut prohibits schools from using the terms “junior college” or “college” or “university” ...unless the institution possesses a license from, or has been accredited by the office of higher education (see above) **Conn. Gen. Stat. § 10a-34(j)** Connecticut requires private degree-granting institutions to describe the programs and services of the institution in language that is accurate, clear and unambiguous. **Regs., Conn. State Agencies § 10a-34-20(c)**, because this achieves a purpose similar to prohibiting deception and misrepresentation, Connecticut receives credit, with regard to private degree-granting institutions, for including a prohibition on deception and misrepresentation.

**VI. COMPLAINT PROCESS & RELIEF FOR STUDENTS:**

**27.75/100 POINTS**

**A. DOES THE STATE REQUIRE A BOND OR FUND AS A CONDITION OF AUTHORIZATION?**

**5/20 POINTS\***

*\*The points for Type 1 and Type 2 institutions have been averaged for the final score for this element*

	Yes	No
Type 1:	20 Points	0 Points
Type 2:	20 Points	0 Points

**Explanation:**

**Type 1: Private occupational schools:**

Connecticut requires private occupational schools to provide an irrevocable letter of credit issued by a bank with its main office or branch located within Connecticut in the penal amount of forty thousand dollars guaranteeing the payments required of the school to the private occupational school student protection account. Like a bond, this helps to ensure a measure of protection for students attending the school. However, Connecticut requires the letter of credit to be released

twelve years after the date of initial approval, provided evidence of fiscal soundness has been verified. Connecticut loses 10 points here because, as recent college closures have demonstrated, even a college that has been around for well over 12 years can encounter financial instability and close, leaving students with tremendous financial difficulties.

**Type 2: Private Degree-granting schools:**

Connecticut law does not specifically require a bond or the equivalent for private degree-granting schools.

**B. DOES THE STATE REQUIRE A REFUND OF TUITION IF A STUDENT ENROLLS AS THE RESULT OF MISREPRESENTATION?**

**0/20 POINTS\***

*\*The points for Type 1 and Type 2 institutions have been averaged for the final score for this element*

	Yes, Full Refund	Yes, Partial Refund	No Refund Required
<b>Type 1:</b>	20 Points	10 Points	<b>0 Points</b>
<b>Type 2:</b>	20 Points	10 Points	<b>0 Points</b>

**Explanation:**

**Type 1: Private occupational schools:**

Connecticut does not have any provisions of law or regulation which specifically require a refund of tuition if a student enrolls in a private degree-granting school as the result of misrepresentation.

**Type 2: Private Degree-granting schools:**

Connecticut does not have any provisions of law or regulation which specifically require a refund of tuition if a student enrolls in a private degree-granting school as the result of misrepresentation.

**C. DOES THE STATE REQUIRE INSTITUTIONS TO REFUND TUITION IN THE EVENT OF CLOSURE?**

**7.5/20 POINTS**

	Yes, Full Refund	Yes, refund is limited in some way	Maybe. Provisions in place for a refund in very limited circumstances.	No Refund Required
<b>Type 1:</b>	20 Points	<b>15 Points</b>	10 Points	0 Points
<b>Type 2:</b>	20 Points	15 Points	10 Points	<b>0 Points</b>

**Explanation:**

**Type 1: Private occupational schools:**

Connecticut does not guarantee a full refund to students when a school becomes insolvent and / or closes. The state has, however, put protections in place for students that would provide for at least a partial refund for students in this situation. Connecticut has created the private occupational student protection account. **Conn. Gen. Stat. § 10a-22m** The state requires each authorized private occupational school to pay to the State Treasurer an amount equal to four-tenths of one per cent of

the tuition received per calendar quarter. In addition to amounts received based on tuition, the account shall also contain any amount required to be deposited into the account with each school's initial application, renewal fees, some fines, and other circumstances as detailed in Conn. Gen. Stat. sections 10a-22a to 10a-22o.

Connecticut requires that, at least 60 days prior to the closure of a school, private occupational schools provide (among other information) evidence that all coursework course work is or will be completed by current students at the school and evidence that there are no refunds due any students. If a school fails to meet these requirements, the school will be fined. The private occupational student protection account is meant to provide refunds to students who are unable to complete a course or unit of instruction because of the insolvency or cessation of operation of a private occupational. **Conn. Gen. Stat. § 10a-22(u);(v)**. There is no guarantee of a full refund, but there is a substantial fund in place to protect students and provide relief.

**Type 2: Private Degree-granting schools:**

Connecticut does not explicitly require private degree-granting institutions to refund tuition in the case of insolvency.

**D. DOES THE STATE ALLOW STUDENTS AMPLE TIME TO MAKE A COMPLAINT?**

**10/10 POINTS\***

*\*The points for Type 1 and Type 2 institutions have been averaged for the final score for this element*

	<b>2 years or more (or no deadline)</b>	<b>1-2 years</b>	<b>Under 1 year</b>	<b>Not Applicable</b>
<b>Type 1:</b>	<b>10 Points</b>	5 Points	1 Point	0 Points
<b>Type 2:</b>	<b>10 Points</b>	5 Points	1 Point	0 Points

**Explanation:**

**Type 1: Private occupational schools:**

There is no specified deadline for students to file a complaint against a private occupational school.

**Type 2: Private Degree-granting schools:**

There is no specified deadline for students to file a complaint against a private degree-granting school.

**E. DOES THE STATE REQUIRE INSTITUTIONS TO DISCLOSE INFORMATION ABOUT FILING A COMPLAINT WITH THE STATE OVERSIGHT BODY?**

**3.75/20 POINTS\***

*\*The points for Type 1 and Type 2 institutions have been averaged for the final score for this element*

**Type 1: Private occupational schools:**

<b>Medium</b>	<b>Yes</b>	<b>Discretionary</b>	<b>No</b>
<b>Catalog</b>	10 Points	<b>5 Points</b>	0 Points
<b>Website</b>	5 Points	<b>2.5 Points</b>	0 Points
<b>Enrollment Contract</b>	5 Points	2.5 Points	<b>0 Points</b>

**Explanation:**

Connecticut requires private occupational schools to clearly display in a location visible to students and the public the school's procedures for resolving complaints regarding the school's operation, including the filing of inquiries or complaints with the commissioner. Connecticut receives credit for discretionary inclusion on school website and catalog because both are locations that are visible to students and the public and it is reasonable to assume that schools may post the required information at these locations. **Regs., Conn. State Agencies § 10a-22k-13(b)**

***Type 2: Private Degree-granting schools:***

Medium	Yes	Discretionary	No
Catalog	10 Points	5 Points	0 Points
Website	5 Points	2.5 Points	0 Points
Enrollment Contract	5 Points	2.5 Points	0 Points

**Explanation:**

Connecticut does not explicitly require private degree-granting institutions to disclose information about filing a complaint with the state oversight body.

F. IS THE COMPLAINT PROCESS READILY ACCESSIBLE AND AVAILABLE ON THE STATE OVERSIGHT BODY WEBSITE?

**1.5/10 POINTS\***

*\*The points for Type 1 and Type 2 institutions have been averaged for the final score for this element*

	Yes, w/ address	Yes, with phone #	Yes, with email address	Yes, with electronic form	No
Type 1:	2 Points	2 Points	3 Points	3 Points	0 Points
Type 2:	2 Points	2 Points	3 Points	3 Points	0 Points

**Explanation:**

***Type 1: Private occupational schools:***

The Connecticut Office of Higher Education website contains a link to complaint procedures under the "information for students" link on the Postsecondary Career School Authorization page. The complaint procedures explanation includes an email address students can use to request a complaint form. <http://www.ctohe.org/POSA/StudentInfo.shtml#Complaint>

***Type 2: Private Degree-granting schools:***

While there is a portal for complaints on the web page for private occupational schools, no such easily accessible portal exists for private degree-granting schools.

VII. ENFORCEMENT: **20/100 POINTS**

A. IS THERE LOSS OF STATE AID FOR SCHOOLS THAT REPEATEDLY PRODUCE  
SUBSTANDARD GRADUATION RATES, JOB PLACEMENT RATES AND / OR COHORT  
DEFAULT RATES?

**0/30 POINTS\***

*\*The points for Type 1 and Type 2 institutions have been averaged for the final score for this element*

	Yes, Required	Yes, Required but limited	Yes, Discretionary	Yes, Discretionary but limited	No
<b>Type 1:</b>	30 Points	20 Points	15 Points	5 Points	<b>0 Points</b>
<b>Type 2:</b>	30 Points	20 Points	15 Points	5 Points	<b>0 Points</b>

**Explanation:**

***Type 1: Private occupational schools:***

Connecticut does not specify any loss of state aid for private occupational schools that repeatedly produce substandard graduation rates, job placement rates and / or cohort default rates.

***Type 2: Private Degree-granting schools:***

Connecticut does not specify any loss of state aid for private degree-granting schools that repeatedly produce substandard graduation rates, job placement rates and / or cohort default rates.

B. DOES THE STATE EXPLICITLY ALLOW STUDENTS A PRIVATE RIGHT OF ACTION  
AGAINST INSTITUTIONS WHO HAVE VIOLATED THE LAWS / REGULATIONS IN  
PLACE TO GOVERN THEM?

**0/30 POINTS\***

*\*The points for Type 1 and Type 2 institutions have been averaged for the final score for this element*

	Yes	Limited Circumstances	No
<b>Type 1:</b>	30 Points	15 Points	<b>0 Points</b>
<b>Type 2:</b>	30 Points	15 Points	<b>0 Points</b>

**Explanation:**

***Type 1: Private occupational schools:***

Connecticut has not created a private right of action for students to bring against private occupational schools that have violated the laws and regulations in place to govern them.

***Type 2: Private Degree-granting schools:***

Connecticut has not created a private right of action for students to bring against private degree-granting schools that have violated the laws and regulations in place to govern them.

C. DOES STATE LAW EXPLICITLY ALLOW ATTORNEY FEE AWARDS FOR STUDENTS  
WHO PREVAIL IN LITIGATION AGAINST SUCH INSTITUTIONS?

**0/20 POINTS\***

*\*The points for Type 1 and Type 2 institutions have been averaged for the final score for this element*

	Yes	Limited	No
<b>Type 1:</b>	20 Points	15 Points	<b>0 Points</b>
<b>Type 2:</b>	20 Points	15 Points	<b>0 Points</b>

**Explanation:**

***Type 1: Private occupational schools:***

Connecticut does not explicitly allow attorney fee awards for students who prevail in litigation against private occupational schools that have violated the laws / regulations in place to govern them.

***Type 2: Private Degree-granting schools:***

Connecticut does not explicitly allow attorney fee awards for students who prevail in litigation against private occupational schools that have violated the laws / regulations in place to govern them.

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**D. DOES THE STATE EXPLICITLY AUTHORIZE ATTORNEY GENERAL INVOLVEMENT?**

**20/20 POINTS\***

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*\*The points for Type 1 and Type 2 institutions have been averaged for the final score for this element*

	Yes	Limited Circumstances	No
<b>Type 1:</b>	<b>20 Points</b>	10 Points	0 Points
<b>Type 2:</b>	<b>20 Points</b>	10 Points	0 Points

**Explanation:**

***Type 1: Private occupational schools:***

Connecticut law allows for attorney general involvement. **Conn. Gen. Stat. § 10a-22j; Conn. Gen. Stat. § 10a-22o(a)**

***Type 2: Private Degree-granting schools:***

Connecticut law allows for attorney general involvement. **Conn. Gen. Stat. § 10a-34b; Conn. Gen. Stat. § 10a-34c; Conn. Gen. Stat. § 10a-34d**

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**BONUS POINTS**

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Connecticut receives 50 Bonus Points because it is NOT a member of NC-SARA (see below)



**ILLUMINATING INFORMATION**



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## PROVISIONS OF NOTE

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Connecticut statute places responsibility for oversight and regulation of private occupational schools with the executive director of the Office of Education. Connecticut regulations, which derive authority from Connecticut statute place responsibility for oversight and regulation of private occupational school with the Commissioner of Higher Education. Connecticut is graded based on the authority of the statute.

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## RECIPROCITY AGREEMENTS

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Connecticut is ***not*** a member of the NC-SARA (National Council for State Authorization Reciprocity Agreements). <http://nc-sara.org/sara-states-institutions>

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## PENDING LEGISLATION

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There is no significant legislation related to the oversight and regulation of private postsecondary institutions pending in Connecticut as of this writing (November 2015).

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## LITIGATION, INVESTIGATIONS, AND ACTIONS INVOLVING PRIVATE FOR-PROFIT EDUCATIONAL INSTITUTIONS IN CONNECTICUT

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**For information about pending and recent federal and state government investigations and actions regarding for-profit colleges see David Halperin's compilation at:**  
<http://www.republicreport.org/2014/law-enforcement-for-profit-colleges/#sthash.1vc4HmPw.dpuf>