

IDAHO: FINAL ANALYSIS

OVERALL SCORE:
281.75 / 700 POINTS
40%
LETTER GRADE:
F

I. OVERSIGHT BODY: **42.5/100 POINTS**

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

37.5 / 60 POINTS

Element	Points Available	Points Awarded
Multi-Member Panel / Board created by statute:	10	10
Board statutorily created specifically to oversee private postsecondary institutions.	10	0
Board is the decision-maker (<i>NOT</i> a single person - like the head of the department or director)	10	5
Board can engage in rule-making	10	10
Meetings must be open to the public	5	5
Must allow public comment	5	0
Board can initiate investigations	5	5
Board can impose penalties for violations	5	2.5
Total Points	60	37.5

Explanation:

The Idaho State Board of Education is charged with regulation and oversight of both private post-secondary educational institutions (degree-granting institutions) and private proprietary educational institutions (non-degree-granting) in Idaho. **Idaho § 33-2402** The board is the decision-maker, but delegates authority to its Executive Director and the Office of the State Board of Education to administer the registration of post-secondary educational institutions and proprietary

schools. **IDAPA 08.01.11.200; IDAPA 08.01.11.300** Therefore, Idaho receives partial credit here. The Board engages in rule making, and has authority to initiate investigations. **Idaho Code § 33-2407; IDAPA 08.01.11.400**. The Director of the Board may issue cease and desist orders, but there are no provisions allowing the board to impose other penalties absent a court order, thus, Idaho receives partial credit for “Board can impose penalties for violations.” It would be preferable for this authority to be given to the Board, however, this is preferable to placing sole authority for imposing penalties with the head of a state agency or department that would be less accountable to the public. **Idaho Code § 33-2408**

Meetings must be open to the public (**Idaho Open Meeting Law Idaho Code § 74-203**). However, there is no requirement that these meetings allow the public an opportunity to comment (**Coalition for Responsible Government v. Bonner County, First Judicial District, Bonner County Case No. CV-97-00107**).

B. STATUTE-SPECIFIED MEMBERSHIP:

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

0/ 25 POINTS

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
25 Points	20 Points	10 Points	0 Points	-5 points

Explanation:

There is no language either prohibiting or mandating a for-profit interested majority on the State Board of Education Board. “Appointment to the board shall be made solely upon consideration of the ability of such appointees efficiently to serve the interests of the people, and education, without reference to locality, occupation, party affiliation or religion.” **Idaho Code § 33-102**

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

0/10 POINTS

Yes	No
10 Points	0 Points

Explanation:

No language in the law or statutes specifies the make-up of the State Board of Education and there is no language which mandates the inclusion of a consumer advocate.

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

5/5 POINTS

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

Explanation:

The Idaho Board of Education consists of 7 members appointed by the governor and confirmed by the senate, and the state superintendent of public instruction, who is an ex officio voting member.
Idaho Code § 33-102

II. STATE OVERSIGHT – EFFICACY: **38/100 POINTS**

A. DOES THE STATE REQUIRE ONSITE REVIEW OF PRIVATE POSTSECONDARY INSTITUTIONS?

3/10 POINTS*

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

	Mandatory On-Site Reviews			Discretionary	None
	Every 2 years or less	Every 3-5 years	Over 5 years	Discretion to Conduct On-Site Reviews	No Review Specified
Type 1	10 Points	8 Points	5 Points	3 Points	0 Points
Type 2	10 Point	8 Points	5 Points	3 Points	0 Points

Explanation:

Idaho requires both post-secondary and proprietary educational institutions to renew their registration annually. The institutions are required to submit a renewal form or to update the Board with regard to any changes that have been made over the course of the previous year. Upon receiving an application or a renewal, the Board may verify the accuracy of submitted information by inspection, visitation, or any other means it considers necessary. **IDAPA 08.01.11.201** (post-secondary) **IDAPA 08.01.11.302** (proprietary).

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 element score, above.*

	Required Unannounced Visits	Discretion to do Unannounced Visits	No indication
Type 1	5 Points	3 Points	0 Points
Type 2	5 Points	3 Points	0 Points

Explanation:

There is no indication that Idaho requires either mandatory or discretionary unannounced onsite inspections of either private post-secondary institutions or proprietary institutions.

C. DOES THE STATE REQUIRE REGULAR REVIEWS OF PRIVATE POSTSECONDARY APPROVAL TO OPERATE?

20/20 POINTS*

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

	Mandatory			Discretionary	None
	Every 2 years or less	Every 3-5 years	Over 5 years	Discretion to conduct reviews	No Review Specified
Type 1	20 Points	15 Points	10 Points	5 Points	0 Points
Type 2	20 Points	15 Points	10 Points	5 Points	0 Points

Explanation:

Idaho requires both private post-secondary institutions and proprietary institutions to renew their registration annually.

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

10/ 20 POINTS*

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

	All 8 Required	7 of 8	6 of 8	5 of 8	4 of 8	3 of 8	2 of 8	1 of 8	0 of 8
Type 1	20 Points	17.5 Points	15 Points	12.5 Points	10 Points	7.5 Points	5 Points	2.5 Points	0 Points
Type 2	20 Points	17.5 Points	15 Points	12.5 Points	10 Points	7.5 Points	5 Points	2.5 Points	0 Points

Element	Type 1	Type 2
Admission Requirements		M
Graduation Requirements		M
Placement Rate		
Completion Rate (or Graduation Rate)	M	M
Advertising Practices	M	M
Cohort Default Rate		
Accreditation Status	M	M
Financial Aid Policies		

M=Mandatory; D=Discretionary

Explanation:

Type 1: Private post-secondary educational institutions:

IDAPA 08.01.11.200; Idaho Private post-secondary registration form is available online at: http://www.boardofed.idaho.gov/priv_col_univ/col_univ_registration.asp

Type 2: Proprietary educational Institutions:

IDAPA 08.01.11.301; Idaho Private post-secondary registration form is available online at: http://www.boardofed.idaho.gov/priv_col_univ/col_univ_registration.asp

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

5/15 POINTS*

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

	Yes, strongly distinguished	Yes, moderately distinguished	Yes, Slightly Distinguished	Not distinguished
Type 1	15 Points	10 Points	5 Points	0 Points
Type 2	15 Points	10 Points	5 Points	0 Points

Explanation:

Non-profits are distinguished from for-profits only in that non-profit postsecondary institutions are exempted from some regulations. **Idaho Code § 33-2402 (1)**

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 element score, above.*

	Yes, Mandatory	Yes, Mandatory but Limited	Yes, Discretionary	Yes, Discretionary but Limited	No
Type 1	10 Points	7.5 Points	5 Points	2.5 Points	0 Points
Type 2	10 Points	7.5 Points	5 Points	2.5 Points	0 Points

Explanation:

There is no indication that Idaho requires increased oversight or scrutiny when a private post-secondary or proprietary institution performs poorly.

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

0/20 POINTS

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

Explanation:

There are no laws or regulations in place that include special protections for veterans who attend private postsecondary institutions or proprietary schools in Idaho. Note, however, that both postsecondary educational institutions and proprietary schools in Idaho are required to report the number of veterans enrolled in their programs on their applications for registration. Outside of this reporting requirement, however, there are no special protections in place.

III. STATE OVERSIGHT - SCOPE & INCLUSION:

87.5/100 POINTS

A. ARE EXEMPTIONS TO STATE OVERSIGHT COVERAGE LIMITED?

87.5/100 POINTS

	No Exemptions	Few Exemptions	Moderate Exemptions	Heavy Exemptions
Type 1	100 Points	75 Points	50 Points	0 Points
Type 2	100 Points	75 Points	50 Points	0 Points

Exemption:

Type 1: Private post-secondary educational institutions:

Idaho law contains a few very narrowly tailored exemptions for private postsecondary institutions in the state. (Public schools and specified religious and non-profit institutions). **IDAPA 08.01.11.200.04**

Type 2: Proprietary educational Institutions:

Idaho law contains several common exemptions and a narrowly tailored exemption for propriety educational institutions in the state. (“post-secondary credit through a consortium of public and private colleges and universities under the auspices of the Western Governors University.”) **IDAPA 08.01.11.300.04**

IV. DISCLOSURE REQUIREMENTS: 3.75/100 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 element score, above.*

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

Explanation:

Idaho does not require either private postsecondary institutions or proprietary educational institutions to disclose any performance measures to potential students.

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 element score, above.*

Type 1: Private post-secondary educational institutions:

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

Explanation:

Idaho does not require post-secondary educational institutions to make any of the above disclosures to students prior to enrollment and there is no mention in statute about disclosures that must be available to students upon request.

Type 2: Proprietary schools:

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

Explanation:

Idaho requires proprietary schools to disclose information to students prior to enrollment, but none of the above disclosures related to institutional performance are required or discretionary (available upon request).

C. DOES THE STATE REQUIRE SCHOOLS TO INCLUDE ELEMENTS ESSENTIAL FOR STUDENTS TO MAKE AN INFORMED DECISION IN THE ENROLLMENT CONTRACT?
3.75/ 20 POINTS*

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

Type 1: Private post-secondary educational institutions:

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:

Idaho does not require schools to include any of the above elements in their enrollment contracts.

Type 2: Proprietary 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:

Idaho requires proprietary schools to disclose, in writing, information about the total cost of the program, refund information and information describing the purpose, length, objectives and completion requirements of the courses or courses of study. The information is required prior to enrollment, but is not required to be done in the enrollment contract.

V. REGULATION OF RECRUITING PRACTICES: 50/100 POINTS

A. HAS THE STATE PUT INTO LAW A LIST OF PROHIBITED ACTS REGARDING ADVERTISING AND RECRUITING?
50/100 POINTS

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

	Yes, strong	Yes, Moderate	Yes, weak	No list of
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	regulation	Regulation	regulation	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”	/	/
Misleading Institution Misleading Institution Affiliations (re: military, public institution, business establishments...)	/	/
Promise Employment		
Compensation for enrollment		
Compensation or “bounty” to recruiters		
Deception (Broad prohibition)	X	X
Misrepresentation (Broad Prohibition)		X
Misleading representations re: accreditation	X	/

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

Explanation:

Type 1: Private post-secondary educational institutions:

Idaho prohibits post-secondary schools from deception and requires schools that have not been fully accredited to disclose to prospective students in these courses or courses of study the accreditation status of the program and anticipated date for full accreditation. This requirement has likely an effect similar to prohibition on misleading statements related to accreditation. Idaho receives partial credit here. The state receives partial credit for its broad prohibition on misleading statements. This is because while there is nothing in the law which specifically prohibits misleading use of the word college or university, nor is there anything specifically prohibiting misleading statements with regard to institution name (which would imply affiliation with the military, public institution...), and no specific prohibition with regard to misleading statements related to accreditation – a broad prohibition on misleading statements would presumably include the above-specified elements. **IDAPA 08.01.11.200.09(a)(iii); IDAPA 08.01.11.201.06(b)(iii)**

Type 2: Proprietary educational institutions:

Idaho prohibits proprietary schools from deception, fraud, and, broadly, from making misleading statements. Idaho receives partial credit for elements related to prohibitions on misleading statements. This is because while there is nothing in the law which specifically prohibits misleading use of the word college or university, nor is there anything specifically prohibiting misleading statements with regard to institution name (which would imply affiliation with the military, public institution...), and no specific prohibition with regard to misleading statements related to accreditation – a broad prohibition on misleading statements would presumably include the above-specified elements. **Idaho Code § 33-2404, IDAPA 08.01.11.302.06(b)(iii)**

VI. COMPLAINT PROCESS & RELIEF FOR STUDENTS:
40/100 POINTS

A. DOES THE STATE REQUIRE A BOND OR FUND AS A CONDITION OF
 AUTHORIZATION?
10/20 POINTS*

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

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

Explanation:

Type 1: Private post-secondary educational institutions:

Idaho law does not contain any provisions which require a private post-secondary educational institution to obtain a surety bond as a condition of registration.

Type 2: Proprietary educational institutions:

A proprietary school shall obtain a surety bond issued by an insurer duly authorized to do business in this state or other financial instrument in a format approved by the director, in favor of the state of Idaho for the indemnification of any student for any loss suffered as a result of a failure by such proprietary school to satisfy its obligations pursuant to the terms and conditions of any contract for tuition or other instructional fees entered into between the proprietary school and a student, or as a result of any violation of the provisions of this chapter or the rules promulgated pursuant to this chapter **Idaho Code § 33-2406**

B. DOES THE STATE REQUIRE A REFUND OF TUITION IF A STUDENT ENROLLS AS
 THE RESULT OF MISREPRESENTATION?
5/20 POINTS*

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

	Yes, Full Refund	Yes, Partial Refund	No Refund Required
Type 1:	20 Points	10 Points	0 Points
Type 2:	20 Points	10 Points	0 Points

Explanation:

Type 1: Private post-secondary educational institutions:

Idaho law has no provisions in place which would require the state to refund tuition if a student enrolls in a private post-secondary educational institution as a result of misrepresentation.

Type 2: Proprietary educational institutions:

Idaho law and regulations do not specify that a student is entitled to a full refund if the student has enrolled as the result of misrepresentation. However, **Idaho Code § 33-2406** states that the director may submit a demand upon the surety on the bond on behalf of a student or students when it is reasonably believed that a loss has occurred due to a failure by such proprietary school to satisfy its obligations pursuant to the terms and conditions of any contract for tuition or other instructional fees entered into between the proprietary school and a student, or as a result of any violation of the provisions of this chapter or the rules promulgated pursuant to this chapter. This provision would likely allow for at least a partial refund in cases of enrollment as a result of misrepresentation.

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

5/20 POINTS*

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

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

Explanation:

Type 1: Private post-secondary educational institutions:

Idaho law contains no provisions which would require private post-secondary schools to refund tuition in the event of insolvency.

Type 2: Proprietary educational institutions:

Idaho law and regulations do not lay out the relief available to students specifically in instances where an institution closes as a result of insolvency. However, **Idaho Code § 33-2406** states that “the director may submit a demand upon the surety on the bond on behalf of a student or students when it is reasonably believed that a loss has occurred due to a failure by such proprietary school to satisfy its obligations pursuant to the terms and conditions of any contract for tuition or other instructional fees entered into between the proprietary school and a student, or as a result of any violation of the provisions of this chapter or the rules promulgated pursuant to this chapter.” Thus, there may be some kind of refund available to students when the school in the event that the school they are attending becomes insolvent. Further, If the school is unable to fulfill its obligations to students, the school must make arrangements for a comparable teach-out opportunity with another proprietary school or refund 100% of prepaid tuition. **IDAPA 08.01.11.301.05(b)**

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 element score, above*

	2 years or more (or no deadline)	1-2 years	Under 1 year	Not Applicable

Type 1	10 Points	5 Points	1 Point	0 Point
Type 2	10 Points	5 Points	1 Point	0 Points

Explanation:

For both private post-secondary educational institutions and proprietary institutions: There is no time frame specified in Idaho law with regard to filing deadlines for student complaints. This is the case for both private post-secondary educational institutions and for proprietary educational institutions.

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

0/20 POINTS*

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

Type 1: Private post-secondary educational institutions:

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:

There are no mandates related to disclosure of information and direction related to filing a student complaint. There is no indication that there are any disclosures related to filing a student complaint, either mandatory or discretionary.

Type 2: Proprietary educational institutions:

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:

Idaho requires proprietary schools to provide the name and contact information for the individual who is responsible for dealing with student grievances and other complaints and for handling due process procedures at the institution; however, there is no indication as to where this information is required to be posted and no indication that the school must provide information related to filing a complaint with the state.

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

10/10 POINTS

	Yes, w/	Yes, with	Yes, with	Yes, with	No
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	address	phone #	email address	electronic form	
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:

Both private post-secondary educational institutions and proprietary institutions:

The Idaho State Board of Education maintains a webpage with a short explanation of the complaint process, a person to contact, phone number, email, and web form for students who wish to file a complaint. The website can be found here:

http://www.boardofed.idaho.gov/priv_col_univ/student_complaint.asp

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

	Yes, Required	Yes, Required but limited	Yes, Discretionary	Yes, Discretionary but limited	No
Type 1	30 Points	20 Points	15 Points	5 Points	0 Points
Type 2	30 Points	20 Points	15 Points	5 Points	0 Points

Explanation:

Both private post-secondary educational institutions and proprietary institutions:

There are no provisions in Idaho statute or regulation that require any loss of state aid for 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

	Yes	Limited Circumstances	No
Type 1	30 Points	15 Points	0 Points
Type 2	30 Points	15 Points	0 Points

Explanation:

Both private post-secondary educational institutions and proprietary institutions:

There is no explicit private right of action for students against institutions who have violated the laws in place to govern them in Idaho.

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

0/20 POINTS

	Yes	Limited	No
Type 1	20 Points	15 Points	0 Points
Type 2	20 Points	15 Points	0 Points

Explanation:

For both private post-secondary educational institutions and proprietary institutions:

While Idaho law has a provision which allows the director of the board to recover costs, which in the discretion of the court may include an amount representing reasonable attorney's fees and reimbursement for investigative efforts; Idaho state law does not explicitly allow attorney fee awards for students who prevail in litigation against institutions who have violated the laws in place to protect students. **Idaho Code § 33-2407**

D. DOES THE STATE EXPLICITLY AUTHORIZE ATTORNEY GENERAL INVOLVEMENT?

20/20 POINTS

	Yes	Limited Circumstances	No
Type 1	20 Points	10 Points	0 Points
Type 2	20 Points	10 Points	0 Points

Explanation:

Both private post-secondary educational institutions and proprietary institutions:

IDAPA 08.01.11.500 (01.) Violations of State Consumer Protection Laws are handled by the Attorney General's office. A complaint alleging a violation of Idaho consumer protection laws shall be instituted, reviewed, and acted upon in accordance with **IDAPA 04.02.01**, "Idaho Rules of Consumer Protection", *Office of the Attorney General*

BONUS POINTS

Idaho does not receive any bonus points.



ILLUMINATING INFORMATION



PENDING LEGISLATION

There is no significant legislation on this issue pending as of June of 2016.

RECIPROCITY AGREEMENTS

Idaho is a member of SARA (National Council for State Authorization Reciprocity Agreements).

<http://nc-sara.org/states/id>

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

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>