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Executive Director

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Governor

Via Email and Certified Return Receipt #7012 2920 0002 2887 2208

December 9, 2014

Mr. Randall B. Barton
Law Offices of Randall K. Barton
Legal Representative of Significant Psychology, LLC
900 N. 21st Ave.
Ozark, MO 65721
b.barton@significantsystems.org

Re: Revocation of the Authorization of Victory University - Institution Code 1537

Dear Mr. Barton:

The Division of Postsecondary School Authorization (DPSA) of the Tennessee Higher Education Commission (THEC) learned in early March 2014 that Victory University (Victory) was closing. On June 17, 2014, you provided your contact information for purposes of future correspondence. This letter serves as notice that DPSA has determined that Victory has not completed all closure obligations and, as a result, DPSA intends to recommend to the Executive Director that (1) Victory's authorization be revoked retroactively to May 2, 2014, the final graduation date, and (2) THEC take the necessary steps to make a claim against the bond secured by Victory at the time of authorization for purposes of addressing rule violations and Tuition Guarantee Fund (TGF) assessments. Your institution may respond to this letter by **4:30 pm, Tuesday, December 23, 2014**, and provide substantial reasons why DPSA should not proceed as planned.

Generally speaking, Victory worked well with DPSA to keep the division apprised of the unfolding events at the institution. It is without hesitation that DPSA acknowledges that it and the larger Victory organization benefited from the dedication of certain Victory employees, including Marie Ford, Dr. Sherryl Weems, and Dr. Shirley Pippins. Nonetheless, the institution missed numerous deadlines and failed to deliver on all commitments. For the purposes of this letter, three such commitments are described in detail.

Victory failed to provide account cards as requested by DPSA. On April 15, 2014, DPSA sent Victory a letter listing the closure obligations DPSA required Victory to fulfill in order to close in good standing. In that letter, DPSA explained that Victory must provide reconciled

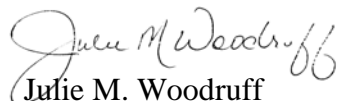
account cards in a described manner for certain groups of students. After numerous emails and meetings, Victory missed deadlines set for April 30, May 16, May 31, June 27, and July 31, 2014. Still to this date, Victory has not provided the requested account cards. A chronology of discussions and deadlines is detailed in Attachment A.

During the many communications over the months following the cessation of instruction, DPSA discussed several student complaints with Victory. In response, Victory would often suggest taking action. Sometimes the action was completed and the complaint resolved; however, that was not always the case. Specifically, Victory failed to provide accurate student transcripts to DPSA after students identified errors to DPSA and Victory. Additionally, Victory failed to fully respond to a formal complaint brought by a student who alleged misrepresentation of scholarship availability and improper financial aid disbursements. A brief description of some of the known complaints is provided as Attachment B.

As to the transcript accuracy, in particular, DPSA assumes that other student transcripts on file with DPSA will contain errors. As a result, students might be entitled to TGF recovery in the future. Additionally, DPSA will be unable to fully address financial questions or complaints brought by students because Victory has not provided the requested account cards. Lastly, Victory's failure to fully address the formal complaint has left DPSA no option but to close the complaint and raise the issue here as a basis for revocation.

Based on the foregoing and the attachments hereto, DPSA has determined that the retroactive revocation is appropriate in this case and that such action is permitted by Tenn. Code Ann. § 49-7-2010(c) and Rules 1540-01-02-.02(2)(e), .22(1)(a), (c), and (g), and .23(4). As such, it is DPSA's intention to recommend revocation to the Executive Director. Any response to this letter shall be received by DPSA by **4:30 pm, Tuesday, December 23, 2014**. Any questions concerning this letter should be directed to me at (615)253-8857 or julie.woodruff@tn.gov.

Sincerely,



Julie M. Woodruff

Assistant Executive Director of DPSA & Lead Attorney

cc: Dr. Stephanie Bellard Chase, Associate Executive Director, DPSA
(stephanie.bellard@tn.gov)
Mr. Michael Clifford, Victory University (mkc@mclifford.com)
Dr. Sherryl D. Weems, Victory University (sherryl.weems@gmail.com)
Ms. Marie Ford, Victory University (emford@gmail.com)
Dr. Shirley Pippins, Victory University (srpippins@gmail.com)
Ms. Karen Myers, Tennessee Student Assistance Corporation (karen.myers@tn.gov)
Mr. Ralph A. LoBosco, United States Department of Education, Federal Student Aid
(ralph.lobosco@ed.gov)
Ms. Robin Hoffman, Southern Association of Colleges and Schools Commission on
Colleges (rhoffman@sacscoc.org)
Cynthia E. Kinser (Mills), Deputy, Tennessee Attorney General, Consumer Advocate and
Protection Division (cynthia.kinser@ag.tn.gov)