

From: [Small, Carolyn](#)
To: [Michael Germano](#)
Subject: Living University's inquiry about Iowa requirements for distance education
Date: Wednesday, April 26, 2017 5:41:21 PM

The Iowa College Student Aid Commission (Iowa College Aid) is in receipt of Living University's inquiry about offering postsecondary education in Iowa via distance education.

Iowa's laws governing the operation of postsecondary educational providers in Iowa set an intentionally high bar for authorization to offer degree programs in the state: a degree-granting institution *must be accredited by an entity recognized by the federal Department of Education*. From Iowa Code Section 261B.13: "Notwithstanding any other provision in this chapter, a school or other entity that grants a degree shall not conduct any portion of a course of instruction or any aspect of its operations or otherwise establish a presence in this state if, with the exception of a school that qualifies for an exemption under section 261B.11, subsection 1, paragraph "h", the school or other entity is not accredited by an accrediting agency recognized by the United States Department of Education."

Since your inquiry did not directly address accreditation, I visited your website, and the US Department of Education's records of institutions that are accredited by entities the US Department of Education recognizes. I found no information on your website about accreditation, and the US Department of Education's records of accredited institutions do not include the University.

The single exception noted in the text of law above [Iowa Code Section 261B.11(1)(h)] is for "Schools and educational programs conducted by religious organizations solely for the religious instruction of leadership practitioners of that religious organization." This exemption allows an unaccredited school that solely offers religious instruction to offer degree programs to persons who are in or aspire to leadership roles within the religious organization with which the school is affiliated. This is a student consumer protection, the point of which is to confine the enrollment at an unaccredited school to persons who will receive credentials that the religious organization with which the school is affiliated will recognize for educational and career advancement within that religious organization.

Our analysis indicates that the University does not qualify for this exemption. While the University is affiliated with the Living Church of God, your inquiry and your website clearly states that you offer your programs to the public, not exclusively to those who are or aspire to be leadership practitioners within the Living Church of God. In addition, we note on your website <http://www.livinguniv.com/frequently-asked-questions> that you offer, or plan to offer, programs that are not solely religious instruction, e.g., an Associate of Arts, a certificate program in business studies, and plans to offer another certificate program in communications.

Thus, until the Institute achieves accreditation by an entity recognized by the federal Department of Education, it cannot lawfully offer any portion of its programs to Iowans via distance education. The University appears to be a good candidate for accreditation as a faith-based liberal arts school. Please advise once the Institute has achieved accreditation by an entity recognized by the federal Department of Education and I will evaluate the conditions under which the institution may initiate distance education program offerings to Iowa residents at that time.

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