Iowa State Board of Education

Executive Summary

November 19, 2025

Agenda Item: Ferneding v. lowa Department of Education, Docket 5215

(Appeal Oral Argument)

State Board

Priority: All priorities – statutory obligation

State Board

Role/Authority: The State Board decides appeals from Education

Savings Account decisions by the Iowa Department of

Education under Iowa Code section 257.11B.

Presenter(s): Thomas A. Mayes

Parties or Counsel for Appellant (10 minutes)

Parties or Counsel for Appellee (10 minutes)

Appellant's Rebuttal Argument (5 minutes)

*Times above are inclusive of questions from State Board

members.*

Attachment(s): Nine

Recommendation: It is recommended that the State Board of Education

hear the arguments of parties and counsel and then

decide this appeal.

Background: This is an appeal of a proposed decision issued by the

Honorable Jasmina Sarajlija, dated August 11, 2025, which affirmed the decision of the Department of Education in this matter. This matter is before the State

Board pursuant to Iowa Code chapter 290 and Iowa Administrative Code chapters 281—6 and 281--20. This is an oral argument only. There will be no new evidence,

testimony, or witnesses.

IOWA DEPARTMENT OF EDUCATION

Sara Fernanding,	Appellant,)	
&)	Docket 5215
)	SCHEDULING ORDER
Iowa Department o	of Education, Respondent.	.)	

On August 29, 2025, the Appellant timely filed an appeal of the proposed decision in this matter, which was issued by ALJ Jasmina Sarajlija. This appeal and the proposed decision will be submitted to the State Board according to the following schedule.

It is hereby ORDERED -

- I. Appellant may submit additional briefing and argument by **October 8, 2025**. Submissions may be filed with the Department and served on Appellee's counsel in person, by ordinary mail, or by electronic mail.
- II. Appellee's counsel may submit briefing and argument by **October 29, 2025**. Submissions may be filed with the Department and served on Appellant in person, by ordinary mail, or by electronic mail.
- III. Appellant may submit a reply brief and argument by **November 5, 2025**. Submissions may be filed with the Department and served on Appellee's counsel in person, by ordinary mail, or by electronic mail.
- IV. This matter will be submitted to the Iowa State Board of Education at its meeting on **November 19, 2025**, **at a time to be determined**. Parties and counsel are welcome to attend personally or participate by video conference call. Location and time to be announced by a separate order.
- V. At oral argument, Appellant will have ten minutes, Appellee's counsel will have ten minutes, and Appellant will have up to five minutes in rebuttal argument. These times are inclusive of questions that members of the State Board may have. No new evidence, testimony, or witnesses will be considered. Any person who attempts to speak during oral argument, other than parties or counsel of record, will be out of order.
- VI. Deadlines will be extended only upon written motion and only upon a showing of extraordinary circumstances.

Done on this 19th day of September, 2025, in Des Moines.

Iowa Department of Education, by

/s/ Thomas A. Mayes

Thomas A. Mayes General Counsel

Copies, by electronic mail, to unrepresented parties and counsel of record

BEFORE THE IOWA STATE BOARD OF EDUCATION

Sara Ferneding,)	
)	
Appellant,)	Case No. 25DOE0008
)	DE Admin Doc. No. 5215
VS.)	
)	FINAL DECISION
IOWA DEPARTMENT OF EDUCATION,)	
)	
Respondent.)	

On August 11, 2025, the administrative law judge issued a proposed decision, which affirmed the Department of Education's decision in this matter. The Appellant timely appealed. After oral argument on today's date, the Department's decision is AFFIRMED and the proposed decision is adopted.

This is final agency action in a contested case proceeding.

Any party that disagrees with the Department's decision may file a petition for judicial review under section 17A.19 of the Iowa Administrative Procedure Act. That provision gives a party who is "aggrieved or adversely affected by agency action" the right to seek judicial review by filing a petition for judicial review in the Iowa District Court for Polk County (home of state government) or in the district court in which the party lives or has its primary office. Any petition for judicial review must be filed within thirty days of this action, or within thirty days of any petition for rehearing being denied or deemed denied.

Dated: November 19, 2025

Iowa State Board of Education, by:

John Robbins, President

CC by certified mail to parties and counsel

IN THE MATTER OF:

Appeal of Sara Ferneding Regarding the Educational Savings Account (ESA) of

Landon Ferneding

Case Number: 25DOE0008 DE Admin Doc. No. 5215

NOTICE OF APPEAL

Pursuant to Iowa Administrative Code rule 281-6.6(4), I, Sara Ferneding, hereby appeal the proposed decision issued on August 11, 2025, in the above-captioned matter.

1. Parties Initiating the Appeal

- Appellant: Sara Ferneding

Address: 2208 Yellowwood Road, Manning, Iowa, 51455

Phone: 712-830-6874

Email: fernedings@gmail.com

- Appellee: Iowa Department of Education

Grimes State Office Building

400 E. 14th Street Des Moines, IA 50319

2. Decision Being Appealed

I am appealing the proposed decision of August 11, 2025, which upheld the Department of Education's determination requiring the return of ESA funds awarded to my son, Landon Ferneding, on the basis that he did not enroll at Unity Ridge Lutheran School by the September 30, 2024 statutory deadline.

3. Findings/Conclusions Challenged

I object to the conclusion that ESA funds must be returned solely because Landon's enrollment date at Unity Ridge Lutheran School was November 4, 2024, rather than prior to September 30, 2024.

4. Relief Requested

I respectfully request that ESA funds be permitted to be applied toward Landon's tuition at Unity Ridge Lutheran School for the period he attended, from November 4, 2024 through May 16, 2025.

5. Grounds for Appeal

While I acknowledge that Iowa law requires private school enrollment by September 30, 2024 for ESA eligibility, I relied in good faith on repeated guidance from Odyssey, the third-party administrator contracted by the Department of Education to oversee the ESA program. Odyssey informed me on multiple occasions that mid-year transfer was permissible and that ESA funds could still be used toward tuition if my child enrolled after September 30.

I disclosed to Odyssey the full circumstances of my son's enrollment change and relied on their official guidance in making educational decisions for my child. Because Odyssey acted as the Department's designated representative for program administration, I respectfully argue that parents should not be penalized for following incorrect instructions provided by the Department's own contractor.

I therefore request equitable relief to ensure that ESA funds already awarded be honored for the actual period of private school attendance.

Dated this 29th day of August, 2025.

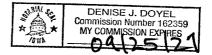
Sara Ferneding, Appellant

2208 Yellowwood Road Manning, Iowa 51455

Phone: 712-830-6874

Email: fernedingf@gmail.com

penise J. Doye



Case No. 25DOE0008 DE Admin Doc. No. 5215

Sara Ferneding, Appellant

vs.

Iowa Department of Education, Respondent

Additional Briefing and Argument by Sara Ferneding, Appellant

I am submitting this appeal to formally dispute the request for repayment of the ESA funds, as the circumstances surrounding this matter arose solely from inaccurate and misleading information provided by Odyssey, the company responsible for administering the ESA program. The proposed decision incorrectly frames this case as an issue of my son not meeting the full-time attendance requirement at Unity Ridge. That is not the basis of my appeal. The basis of my appeal has always been that Odyssey failed to provide me with accurate guidance on the state requirements for the eligibility of the ESA funds for my son. At all times, I acted in good faith, relying on Odysseys' repeated verbal & email communications that my son was eligible to use the ESA funds for private school tuition past the September 30th deadline. The misunderstanding did not result from any negligence or failure on my part, but from Odyssey's failure to provide accurate guidance consistent with the program's state requirements. This appeal seeks to ensure that accountability is placed where it rightfully belongs – with the program administrator whose misinformation caused the situation.

In the fall of 2023 ESA's were available to parents for the first time in Iowa to help with private school tuition if they were eligible. I was one of those parents whose children were in public school & wanted to take advantage of this program. I had applied for the ESA's for both of my children & they were approved. My daughter made the switch to the private school from day one of the school year that fall. My son was hesitant, so he began his 2023-2024 school year in the public school.

In the fall of 2023, after school had begun, I had a question regarding the availability of those ESA funds if my son was wanting to switch at semester. With the program being new I was unsure if this was even a possibility and if it was, I wanted to learn about what I needed to do if we were to switch him from public to private school during the school year. I reached out to Odyssey, the third party administrator hired by the Iowa Department of Education to run their ESA program, to ask my question.

On Oct 11, 2023 at 10:04GMT-12 I emailed Odyssey the following:

My son did not attend the private school as planned at the beginning of the school year. If we switch him to the private school at semester is he still eligible for the 2^{nd} half of the ESA for the 2^{nd} semester.

I received the following response at 10:13GMT-12 from Customer Care Associate, Haley J: Hi Sara,

Thank you for reach out to us. If your son switches to the private school, he will still be eligible for the second half of the ESA for the second semester. If you have any further questions or need assistance with anything else, please feel free to let me know. I'm here to help! (attached 10.11.23 Email With Odyssey Support Stating Mid Year Switch Would Be Covered By ESA Funds – this should already be included as evidence in the case from the original appeal)

My question was clear. My son had not yet enrolled in private school. Could he use the approved ESA funds for the 2nd semester? The answer was also clear. Yes. "He would still be eligible for the second half of the ESA for the second semester." There was no mention at all about the September 30th cut off date for ESA fund eligibility at all.

This response led me to believe that the ESA funds I applied & was approved for would still be available to my son if he switched to the private school in the middle of the school year. As it turned out, my son did not switch to the private school his 2023-2024 school year so it was not an issue for this year.

In April of 2024 I applied for the ESA funds for my son & daughter for the 2024-2025 school year. I received an approval email for both of them on 4.23.2024. (attached 4.23.24 ESA Approval Notice – this should already be included as evidence in the case from the original appeal) My daughter began attending the private school again at the beginning of the 2024-2025 school year. Once again, my son did not switch to the private school at the beginning of the year. He continued attending our public school at the beginning of the 2024-2025 school year.

In mid-October of 2024 my son expressed interest in wanting to switch to the private school. Having been told on October 11, 2023 that his approved ESA funds would be available for use at semester I once again reached out to Odyssey to verify that what I was told on October 11, 2023 by Odyssey Customer Care Associate Haley J. was still in fact correct. I was double checking to make sure what I had been told a year ago was still correct information. I did not want to switch my son without knowing I would have use of his approved ESA funds and I wanted to do my due diligence to ensure his tuition would be covered.

On October 24, 2024 at 4:32PM I emailed Odyssey the following:

I was approved for the ESA funds for my son for the 24-25 school year. I applied incase we were going to switch him to a private school this year. We are hoping to do that now within the next 2 weeks. Are those funds still available since we are half way through the first semester? What do I need to do to get those funds set up with he private school we want to switch him to?

Thank you,

Sara

(attached 10.24.24 Email to Odyssey About Available Funds for School Transfer – this should already be included as evidence in the case from the original appeal)

On October 24, 2024 at 4:51pm I received this response from Customer Care Associate Sonia B:

Hi Sara,

Thank you for reaching out with your question regarding the ESA funds for your son's schooling. I can confirm that the tuition was paid out to the school. Therefore, I recommend contacting the school directly to discuss your son's enrollment and attendance. You have already chosen a school and they were accepted.

If you have any further questions or need assistance, please let me know.

Best,

Sonia B, Customer Care Associate

(attached 10.24.24 Email Response From Odyssey – Funds Had Been Paid Out Already – this should already be included as evidence in the case from the original appeal)

Sonia confirmed that the tuition had been paid to the private school but completely disregarded my comments about the fact that he had not even attended. She did not even question the situation and "recommended contacting the school directly to discuss" my "son's enrollment and attendance." This indicated to me that I needed to contact the private school about him starting & attending & that there were no issues with him switching at this time and that his ESA funds were not in question. My statements & questions above where very clear. My son had not yet started to attend the private school. I was wanting to switch him in the next few weeks. What did I need to do to make sure the funds were available when I wanted to switch him? This conversation raised concerns with me that Sonia brought up but did not thoroughly address. As a customer care associate who was trained to understand & implement the program with clients, she failed to alert me of any issues with my situation at this time & led me to believe my son was able to attend the private school at this time. Again, this associate did not mention anything about ineligibility past the September 30th deadline.

I would like to point out the start of a pattern here. In addition to Haley never mentioning the September 30th deadline, Sonia also never mentioned the September 30th deadline for my son

to have attended the school in order to qualify for the ESA funds. This is now two Customer Care Associates from Odyssey who have failed to state that my son was ineligible for the ESA funds due to the September 30th deadline having passed. If the September 30th deadline was such a strict requirement, why had I not yet been made aware of this by either associate from the very agency hired by the Iowa Department of Education to enforce the rules & laws of the ESA program during my communications about transferring my son after the September 30th deadline? This indicated to me that the September 30th deadline was not a hard deadline and that students were able to transfer to private schools after the September 30th deadline and still have access to the ESA funds.

On Saturday October 26, 2024 at 5:02pm I received an automated follow up email asking if I needed further assistance from my conversation with Sonia. On Sunday October 27, 2024 at 12:32pm I responded that I did have a further question & requested a phone number to call & speak with someone that week. I was the one to initiate further questioning of this situation because it did not seem right to me that funds had been paid to the private school for time during which my son did not attend. I questioned that. Not the Customer Care Associates from Odyssey. My taking the lead on this concern & pushing it further to make sure I was being given proper information is what led to the phone call with Odyssey Parent Specialist Kyanna R on October 30, 2024 at 5pm CST.

During my conversation with Kyanna on October 30, 2024, I reiterated my concerns of the ESA funds already having gone to the private school even though my son had not yet started to attend but was wanting to start attending in the next few days. Kyanna was the first person from Odyssey to acknowledge the September 30th deadline but then stated "I'm pretty sure the funding that was approved for that school would be perfectly fine, and he should be able to use them." This indicated to me for a 3rd time that the September 30th deadline was not a hard-set date & that the ESA funds would still be available to him. Kyanna was going to double check with her team & get back to me via an email with the answer.

At 8:00pm on October 30, 2024 Kyanna responded back to me in an email confirming the availability of the ESA funds for my son when he started attending the private school in the coming days. She wrote "Regarding your inquiry about Landon's tuition for Unity Ridge Lutheran School, I want to reassure you that there was no error, as you approved the tuition. Landon's boarding process at Unity Ridge should proceed smoothly, and there will be no concerns about the payment for this semester." This was now the fourth confirmation I had gotten from Odyssey stating &/or confirming that my son's ESA funds would be available after the September 30th deadline. In this response she clearly stated she wanted to "reassure" me "there was no error" & "there will be no concerns about the payment for this semester." She was very clear.

With that 4th confirmation from Odyssey that the ESA funds would be available for my son to transfer after the September 30th date, I then transferred my son to Unity Ridge Lutheran School on November 4th 2024. I had done my due diligence in checking not once, not twice but four times with Odyssey about the ability to switch my son from public to private school after the September 30th date. What reason did I have to believe this would not be accurate information at this point? Afterall, I was contacting the company that was in charge of administering the ESA program to families. They would surely know all of the rules & regulations of the program and how it works. I not only made contact with Odyssey four times but was told the same information by 3 different people & one of them even consulted her team about my situation before wanting to "reassure" me "there was no error" and confirming with me "there will be no concerns about the payment for this semester". This was not an isolated incident of mistaken information being given by one person. I was given this misinformation by multiple people at Odyssey.

While the proposed decision from Administrative Law Judge, Jasmina Sarajlija, acknowledges that I acted with due diligence and errors were made by others, it fails to properly weigh the significance of those errors. The fact remains that Odyssey – the very entity charged with administering the ESA program – repeatedly provided misinformation and failed to uphold its obligation to give accurate guidance to a participating family.

I am respectfully appealing the demand for this repayment, as I relied in good faith on the information repeatedly provided to me by the Odyssey representatives, who assured me on four separate occasions that my son was eligible to use the ESA funds for this private school tuition. At no point, during any of my conversations with the Odyssey Customer Care Associates or Odyssey Parent Specialist, did they state the September 30th deadline requirement was a hard deadline that disqualified my son for the ESA funds. Odyssey's repeated misrepresentations are what led me to transfer my son to the private school believing his tuition would be covered. Therefore, I feel any resulting financial responsibility rests with Odyssey, whose failure to provide accurate & complete information led to this error – not with me as a parent who acted according to their guidance.

This issue is not a matter of a parent failing to follow a deadline, but rather a result of Odyssey – the company entrusted with administering the ESA program – failing to provide accurate & lawful guidance as required under state regulations. As the designated program operator, Odyssey had a duty to ensure families received correct information regarding the eligibility, deadlines and proper fund usage. Their repeated assurances that my son would remain eligible directly contradicted those obligations. I acted in full compliance based on the information provided and therefore should not be held liable for Odyssey's administrative failure to uphold the standards & requirements set forth by the state.

IN THE IOWA ADMINISTRATIVE HEARINGS DIVISION CENTRAL PANEL BUREAU

SARA FERNEDING, Appellant,)	Case No. 25DOE0008
v.)	DE Admin Doc. No. 5215
IOWA DEPARTMENT OF EDUCATION,)	PROPOSED DECISION
Respondent.)	

STATEMENT OF THE CASE

Appellant Sara Ferneding seeks a reversal of a decision made by the Respondent Iowa Department of Education (Department) requiring Unity Ridge Lutheran School to refund the Education Savings Account (ESA) funds that were paid for her child L.F. to attend a non-public school in the 2024-2025 school year because he did not meet the full-time attendance requirement.

A telephone hearing was held in this matter on July 7, 2025, before the undersigned administrative law judge, Jasmina Sarajlija, pursuant to agency rules found at Iowa Administrative Code 281—chapters 6 and 20. Appellant Sara Ferneding appeared self-represented. The Department of Education was represented by Iowa Assistant Attorney General Lindsey Browning. Respondent exhibits 1 through 10 were received into evidence. Department of Education School Business Operations Bureau Chief Dr. Kassandra Cline and Executive Officer Eric How testified for the Department. Appellant Sara Ferneding testified in support of her appeal.

FINDINGS OF FACT

The Department of Education administers the Students First Education Savings Account (ESA) program. This program provides a funding source for students attending a nonpublic accredited school in Iowa. ESA applications are submitted and managed through an online portal managed by Odyssey, the Department's contracted third-party ESA program administrator.

An applicant must apply for ESA funding by June 30 for the upcoming school year. Once an application is approved, the applicant is provided written notice of the approval and informed of the "next steps" that must be taken to retain the ESA funds. First, the notice directs the parent to "select the accredited nonpublic school your student plans to attend." Next, the notice explains that the selected school will either confirm or deny the student's enrollment. Upon confirmation of enrollment, the school is able to charge the tuition and fees through the Odyssey portal. Finally, the parent is advised that they must then confirm the amount of tuition or fees charged by the nonpublic school. The notice advises that this final step must be completed for each semester.

Public and nonpublic schools are required to report student enrollment to the Department by October 1. Reporting enrollment is critical because enrollment generates funding for schools. As such, a student can be counted in only one place, which is where they are attending as of October 1. Public schools submit and certify student enrollment directly to the Department. Nonpublic school enrollment is reported to the Department through Odyssey. Specifically, ESA program rules require nonpublic schools to update student enrollment within three days of an enrollment change, but no later than by September 30. Odyssey does not have access to public school enrollment information.

This appeal concerns ESA funding approved for Ferneding's son, L.F. He was first approved for an ESA for the 2023-24 school year. On September 28, 2023, Odyssey sent Ferneding a reminder notice that she needed to review and confirm the tuition and fees charged by the nonpublic school before payment would be approved. The notice specifically stated, "if payment of tuition and fees is NOT confirmed in the Odyssey platform prior to September 30, 2023, your student's ESA will be closed." Ferneding did not confirm the tuition for the nonpublic school because her son was still attending a public school at that time.

On October 11, 2023, Ferneding submitted an inquiry to Odyssey about L.F.'s ESA eligibility. She explained that L.F. did not attend the nonpublic school at the beginning of the 2023-24 school year. She then asked whether he would be eligible for ESA funds to cover the second semester if he switched to a nonpublic school for the second semester. Odyssey advised her that L.F. would still be eligible for an ESA payment for the second semester. As L.F. remained at a public school for the remainder of the school year, no ESA funds were paid for him for the 2023-24 school year.

In April 2024, Ferneding submitted an ESA application for L.F. for the 2024-25 school year. On April 24, 2024, she received notice from Odyssey that L.F.'s ESA was approved. The approval notice outlined the required "next steps," including the selected nonpublic school confirming L.F.'s enrollment and uploading tuition and fees through the Odyssey portal. The notice advised Ferneding that she would need to confirm the amount of tuition and fees charged by the following deadlines:

- This step MUST be completed for BOTH Fall AND Spring semesters in order to maintain your student's ESA eligibility.
- Fall funding will be available beginning July 15, 2024.
 - Tuition and fees approved prior to July 15 will be paid beginning July 15.
- Fall ESA tuition and fee deadline is September 30, 2024.
- Spring funding will be available beginning December 1, 2024.
- Spring ESA tuition and fee deadline is February 1, 2025.

Department records indicate Ferneding selected Unity Ridge Lutheran School (Unity Ridge) as the nonpublic school L.F. would attend. Unity Ridge then verified L.F.'s enrollment on June 9 and uploaded his fall tuition charges on July 22. Ferneding confirmed the fall tuition on July 31. By statute, the Department must make ESA funds available to approved applicants starting on July 15. In this case, after Unity Ridge verified

L.F.'s enrollment and Ferneding confirmed the tuition charges, the Department processed and paid L.F.'s fall tuition to Unity Ridge on August 23.

L.F. did not attend Unity Ridge at the start of the 2024-25 school year. However, since Unity Ridge did not update L.F.'s enrollment status to "did not attend," Odyssey's records continued to show that L.F. was verified as attending Unity Ridge. From the start of the school year on August 23 through October 31, L.F. attended a public school. On October 1, the public school correctly reported to the Department that L.F. was attending a public school.

On October 1, the Department pulled a list of students attending nonpublic schools as reported through the Odyssey portal. This list was then reviewed by the Department's accreditation team to compare it to the list of students reported as attending public schools. A list of students was reported as dual-enrolled at both a public and nonpublic school, including L.F. From mid- to late October, the Department took steps to individually verify the enrollment status of the students on this list.

Around the same time, on October 24, 2024, Ferneding submitted an inquiry to Odyssey regarding L.F.'s ESA eligibility. She informed Odyssey that L.F. was approved for an ESA for the 2024-25 school year but he had not switched enrollment to a nonpublic school yet. Ferneding stated L.F. was planning to switch in the next two weeks, and asked whether his ESA funds were still available to him. A representative from Odyssey confirmed to Ferneding that tuition was paid to the nonpublic school, but recommended that Ferneding contact the school directly to discuss her son's enrollment and attendance at the nonpublic school.

Ferneding subsequently communicated with the Unity Ridge principal regarding L.F.'s ESA. The principal confirmed that L.F. was showing as approved, but indicated she was not the one to approve him. The principal further stated that she did not realize ESA paid for L.F.'s tuition and fees even though he was not attending Unity Ridge. The principal expressed her belief that a student must attend a full semester to be eligible for ESA funds and doubted L.F. would be covered for the spring semester unless the Department made an exception.

After this email exchange with the principal, Ferneding submitted a request to Odyssey on October 27 asking to speak to a representative. On October 30, 2024, she had a phone conversation with an Odyssey representative. The transcript of this phone conversation shows Ferneding explained that L.F. was approved for ESA funds and Unity Ridge was already paid by ESA even though L.F. had not attended that school yet. She stated that she is intending to switch L.F. to Unity Ridge the next day and wanted to confirm if the ESA funds would still be available for him. After consulting with her team, the Odyssey representative told Ferneding:

Regarding your inquiry about [L.F.'s] tuition for Unity Ridge Lutheran School, I want to reassure you that there was no error, as you approved the tuition. [L.F.'s] boarding process at Unity Ridge should proceed smoothly, and there will be no concerns about the payment for this semester.

L.F. started attending Unity Ridge on November 4. On December 10, Unity Ridge uploaded L.F.'s spring tuition, and Ferneding confirmed the tuition the next day. An ESA payment was processed and paid out to Unity Ridge on December 26 for L.F.'s spring semester.

On January 23, 2025, the Department informed Ferneding that a Department review determined L.F. was ineligible for the ESA program. The email stated:

During a recent ESA program review, it was discovered that your student, [L.F.] was incorrectly approved in the 2024-2025 school year for the ESA program. ESA eligibility requires the student to attend full-time at the accredited nonpublic school; however, your student attended a public school and was counted as attending full time on the public school's Certified Enrollment for the 2024-2025 school year, which makes them ineligible for the ESA program. The Department has notified the school, Unity Ridge Lutheran School, that all amounts paid to the school from the ESA are **required** to be returned by the school to the ESA.

Department records indicate that [L.F.] started with the public school on August 23rd, 2024 and exited on October 31st, 2024, attending 45.5 days.

Ferneding appealed the decision on January 27. The appeal was reviewed by Dr. Kassandra Cline, Bureau Chief of School Business Operations, and Eric How, ESA program administrator. Following review of the relevant information, the Department concluded that it correctly determined L.F. was ineligible for the ESA program and the nonpublic school was required to return the ESA payments made for him. The Department notified Ferneding of its decision by email on March 4, which stated in part:

After a thorough review by the internal ESA team, the decision has been made to uphold the current status: **Approved - Did Not Use.**

To retain an ESA for the 2024-2025 school year, students were required to:

- Attend full-time as defined by Iowa Administrative Code R. 281-20.1 (3), at the accredited, nonpublic school on or prior to September 30th, 2024.
- Complete the tuition payment process by the September 30th, 2024 deadline.

There are also program rules for schools to follow in order to continue participating in the ESA program.

- Schools are required to *maintain* accurate enrollment statuses of ESA students within the Odyssey system of record.
- Schools are required to *update* the Odyssey system of record of enrollment changes (e.g., withdrawn, did not attend) within 3 business days.

• Schools are required to return all funds in the case of a student not meeting program requirements as noted above.

. . .

The eligibility determination review reflects the full-time attendance requirement **was not met.** Furthermore, the school is responsible for completing accurate and timely updates (within 3 business days) of enrollment statuses within the Odyssey system of record to ensure program rules are followed. This ensures ESA funds are only used for students who meet all requirements of the ESA program. In this case, several rules and requirements were not met, resulting in the refund requirement of the incorrect payments. As a result, the Department has instructed Unity Ridge Lutheran School to return all ESA payments for this student to the program.

At hearing, the Department maintained its eligibility determination was correct due to the student not meeting the full-time attendance requirement. The Department asserted Unity Ridge was required to update L.F.'s enrollment status to "did not attend" within three days of the change, but no later than September 30. The Department acknowledged that Odyssey gave Ferneding incorrect information in October 2024 when she inquired about L.F.'s ESA eligibility. The Department explained the misinformation occurred because Odyssey's records showed that L.F. was verified as attending Unity Ridge and tuition had been paid. As Odyssey does not have access to public school reports, it would not have known that L.F. was also reported as enrolled in a public school. The Department further asserted that ESA eligibility is determined for the entire school year, not by semester. Therefore, even though L.F. attended the entire spring semester at Unity Ridge, he is not entitled to an ESA payment for the spring semester.

Ferneding testified at the hearing. While acknowledging that L.F. did not attend Unity Ridge from the start of the school year, she pointed out that she sought information from Odyssey regarding his continued eligibility. She told Odyssey he had not yet started at the nonpublic school as of October 24. Even knowing this information, Odyssey still assured her there would be no issues with her son's ESA payments. She transferred L.F. to Unity Ridge based on this assurance that the ESA would cover his tuition and fees. Ferneding pointed out Odyssey also gave her incorrect information the prior school year. Specifically, Odyssey told her ESA would cover tuition even if her son transferred to a nonpublic school for the spring semester only. Ferneding indicated that if Unity Ridge is required to refund the ESA payments, she would be responsible for paying Unity Ridge for L.F.'s tuition and fees. Ferneding reiterated that she did her due diligence but was repeatedly given wrong information by Odyssey regarding L.F.'s continued eligibility.

CONCLUSIONS OF LAW

The education savings account program, enacted in January 2023, is outlined in Iowa Code section 257.11B. For the 2024-2025 school year, the eligibility criteria states, in relevant part to this appeal:

- (2) For the school budget year beginning July 1, 2024, the following pupils who attend a nonpublic school for that school budget year shall be eligible to receive an education savings account payment:
- (b) A resident pupil who is eligible to enroll in grades one through twelve and was not enrolled in a nonpublic school for the school year immediately preceding the school year for which the education savings account payment is requested.1

The Iowa Code also provides information regarding the application process for the ESA program. The parent or guardian must apply between January 1 and June 30 of the school year preceding that for which the ESA payment is requested.² The Department must notify the parent or guardian of each pupil approved for the following school year within thirty days of the application.³ Parents or guardians must annually apply for ESA payments as ESA payments are only approved for one school year.4

The Code provisions related to the ESA program also detail the Department's authority to carry out and effectuate the program. The Code authorizes the Department to make and enter into contracts with third-party entities necessary for administering the program.⁵ The law also authorizes the Department to reduce the possibility of waste, fraud, and abuse and conduct audits or other reviews necessary to properly administer the program.⁶ Finally, the Department is authorized to adopt rules for the administration of the fund and the accounts within the fund.7

A parent may appeal any administrative decision the Department or a third-party entity makes pursuant to the ESA program including eligibility, allowable expenses, and removal from the program.⁸ By rule, the Department will take reasonable efforts to verify eligibility of parents, students, nonpublic schools, and providers to participate in the ESA program.9

In implementing the ESA program, the Department set a September 30 deadline to ensure students were still eligible for the program as shown by the student's enrollment in a nonpublic school and the verification that the student had tuition and fees owed to the nonpublic school. The September 30 deadline is based on a statutorily established deadline of October 1 for establishing student enrollment. Under Iowa Code section 257.6(1)(a), "actual student enrollment is determined annually on October 1, or the first Monday in October if October falls on a Saturday or Sunday."10 Public schools are required to report students enrolled in public schools within the school district in grades

¹ Iowa Code § 257.11B(2)(a)(2).

² Iowa Code § 257.11B(3)(a).

³ Iowa Code § 257.11B(3)(b).

⁴ Iowa Code § 257.11B(3)(c).

⁵ Iowa Code § 257.11B(5)(a), (c).

⁶ Iowa Code § 257.11B(5)(*e*)−(*f*).

⁷ Iowa Code § 257.11B(5)(*q*).

⁸ Iowa Code § 257.11B(9)(a).

⁹ Iowa Administrative Code (IAC) 281-20.4(1).

¹⁰ Iowa Code § 257.6(1)(*a*).

kindergarten through grade twelve. The reporting deadline allows the Department to complete its required verification of the student's continued eligibility for the ESA program.

The contested issue on appeal is whether the Department correctly determined that student L.F. did not retain ESA eligibility because he did not attend a nonpublic school full-time during the 2024-25 school year. The Department asserts L.F. had to attend the nonpublic school by September 30. Ferneding asserts the Department's decision should be reversed because Odyssey assured her L.F. was still eligible for ESA payments before she transferred him to the nonpublic school.

The Department's determination that L.F. failed to retain ESA eligibility must be upheld given the circumstances in this case. A student's enrollment in a nonpublic school is an eligibility requirement under the ESA program. Pursuant to ESA administrative rules, students are deemed to attend a nonpublic school for that school budget year if the student attends a nonpublic school on a full-time basis.¹¹ "Full-time" is defined by ESA administrative rules as enrollment at a nonpublic school with a minimum school calendar that meets the requirement of Iowa Code section 279.10 for at least 75 percent of the school's definition of "full-time."¹² The record in this case shows L.F. did not meet the full-time attendance requirement at a nonpublic school. He attended a public school for 45.5 days of the 2024-25 school year. Therefore, under the eligibility criteria established by 257.11B and ESA administrative rules, L.F. failed to retain his ESA eligibility for the 2024-25 school year. The ESA funds paid to Unity Ridge for L.F. were improperly paid and the Department is required to recover all improperly paid ESA funds.¹³

While affirming the Department's decision, the undersigned still acknowledges that Ferneding did her due diligence in this case. Unity Ridge failed to update L.F.'s enrollment status to reflect that he was not attending the school by September 30. Upon learning ESA paid Unity Ridge, Ferneding contacted Odyssey to inquire whether L.F. was still eligible for ESA. Ferneding made Odyssey aware L.F. was not enrolled in a nonpublic school as of October 24. Odyssey assured her L.F.'s boarding process to Unity Ridge should proceed smoothly and there would be no issues with his ESA payment. Ferneding transferred L.F. to Unity Ridge in reliance on this assurance by Odyssey that he was still eligible for ESA funds. Despite the errors made by others, however, it does not change the outcome of this appeal. The undersigned must uphold the Department's determination under the applicable statute and rules that L.F. failed to retain ESA eligibility due to not meeting the full-time attendance requirement and the ESA payments must therefore be refunded.

DECISION

For the reasons discussed, the Department's decision requiring Unity Ridge Lutheran School to refund the ESA funds paid for student L.F. for the 2024-2025 school is **AFFIRMED**.

¹¹ IAC 281-20.2(2).

¹² IAC 281-20.1(3).

¹³ IAC 281-20.4(4).

cc: Sara Ferneding, 2208 Yellowwood Road, Manning, IA 51455, fernedings@gmail.com (By Mail and Email)
Rebecca Griglione, DOE (By AEDMS)
Marc Elcock, Assistant Attorney General (By AEDMS)
Lindsey Browning, Assistant Attorney General (By AEDMS)

APPEAL RIGHTS

Any adversely affected party may appeal a proposed decision to the state board within 20 days after issuance of the proposed decision. An appeal of a proposed decision is initiated by filing a timely notice of appeal with the office of the director. The notice of appeal must be signed by the appealing party or a representative of that party, contain a certificate of service, and provide the other necessary information specified in the rule. The requirements for the notice are found at Iowa Administrative Code rule 281—6.6(4). Appeal procedures can be found at Iowa Administrative Code rule 281—6.6(5). The board may affirm, modify, or vacate the decision, or may direct a rehearing before the director or the director's designee.

¹⁴ IAC 281-6.6(4).

¹⁵ IAC 281-6.6(4).

¹⁶ IAC 281-6.6(6).

Case Title: SARA FERNEDING, APPELLANT V. IOWA DEPARTMENT OF

EDUCATION, RESPONDENT (5215)

Case Number: 25DOE0008

Type: Proposed Decision

IT IS SO ORDERED.

Jasmina Sarajlija, Administrative Law Judge

#327915 Call with Sara Ferneding

Submitted

Received via

Requester

October 30, 2024 at 05:00

Phone call (outbound)

Sara Ferneding <fernedings@gmail.com>

Status category

Ticket status

Type Priority

Group Assignee

Closed

Solved

1 ow

Support

Fernando Duarte

Contact Reason

Time spent last update (sec)

Original Ticket Number

Total time spent (sec)

Parent::Outbound Call

7632

327915

7632

Program State

Iowa

Kyanna R. October 30, 2024 at 05:00

Internal note

Call to: +1 (712) 830-6874 Call from: +1 (856) 242-7157

Time of call: October 30, 2024 at 5:00:26 PM UTC

Called by: Kyanna R.

Kyanna R. October 30, 2024 at 05:05

Internal note

Outbound call to +1 (712) 830-6874

Call Details

Call from: +1 (856) 242-7157 Call to: +1 (712) 830-6874

Time of call: 2024-10-30 17:00:26 UTC

Called by: Kyanna R.

Length of phone call: 4 minutes, 36 seconds

Fernando Duarte October 30, 2024 at 05:05

Internal note

You must provide a value for the Original Ticket Number field to make sure the transcription of this ticket is added to that original ticket

Odyssey Automation Bot October 30, 2024 at 05:05

Internal note

Call transcript:

00:00 Speaker 1: Hello.

00:01 Speaker 2: Hi, Sarah, this is Kiana from Odyssey Support today.

00:06 Speaker 1: Good. How are you?

00:08 Speaker 2: I'm good, I'm good. Thank you for asking.

00:10 Speaker 1: Yeah. So my question on my ESA for my son Landon is that we applied for. I applied for the ESA for both my son and my daughter and got approved. My son did not switch to the public or the private school at the beginning of the year, but we're ready to switch him now. And I'm just wanting to kind of talk over making sure those funds are still available that, you know, that what we need to make sure everything that all the ducks in a row that he can switch and how we go about doing that. Because what I found out when I emailed earlier, like about sometime last week is they said that his funds have been accepted by the school. And I don't understand why that happened because he hadn't gone there yet. So I'm assuming there was an error made somewhere that he was accepted and marked as having attended that private school already. And I just needed to confirm that

and see how we get that rectified or what we need to do to make sure that everything is as it should be for just documenting officers and stuff.

- 01:28 Speaker 2: So your son, his funds were approved for a school that he's going to be needing, correct?
- **01:36 Speaker 1:** Nope. He went to a public school at the beginning of the year. He hasn't attended a private school yet this year.
- 01:42 Speaker 2: Okay.
- **01:43 Speaker 1:** The funds that were approved that I signed him up for were supposed to go to Unity Ridge. And what the principal there is telling me, she's confirming what the other, the email from the other person that Odyssey says is that those funds have been approved and have been paid to that community Ridge already.
- 02:04 Speaker 2: Okay.
- 02:04 Speaker 1: Right.
- **02:05 Speaker 2:** So I will. I would ask my team, I would reach out to my team to find out if the funds that were approved for the private school that he hasn't attended yet, if they would be available for when he does attend. You said he will be there in about two weeks, correct?
- **02:22 Speaker 1:** Well, probably tomorrow. If. If I can. If. If we're able to, Mike, because what my concern is is that the principal at Unity Ridge has not dealt with ESAs before. So she's unsure of how this is going to go. And she's just got it in her mind that we're going to be denied, we're not going to be allowed to get the funds. It's going to be a big ordeal. And so I'm like, oh, well, I hope not.
- 02:44 Speaker 2: No. Yeah, understandable.
- **02:47 Speaker 1:** Like, I need that money to send in there. I don' it was approved because he wasn't. He's not there. My daughter is. But he wants to start there tomorrow. And so I'd like to go ahead and get that. Just make sure that everything is. Is in line so that I know that that money is going to be there if I start sending him tomorrow.
- 03:05 Speaker 2: Okay. Yeah. So I will reach out to my team to find out if the funds that were approved for the school is going to be good to go for him when he does attend the school with the funding being approved before he got there. I believe that it's due to the fact that the program was closed on the 30th, so everything that was set up in line for, like, any applications or the schools and the stuff that you had to submit, they were approved for. But I will ask my team. I'm pretty sure that the funding that was approved for that school would be perfectly fine, and he should be able to use them. But I will let you know via email. I reach out to them now, and once I get an update, I'll send an email to you as soon as possible. Okay.
- **03:54 Speaker 1:** Okay. Yeah, because, I mean, and then if we need to reimburse for, you know, from the start of the school year to today, for example.
- 04:02 Speaker 2: Right.
- **04:03 Speaker 1:** You know, how do we do that? Because technically they shouldn't have received those funds if he hasn't attended.
- 04:08 Speaker 2: Absolutely, I will.
- 04:09 Speaker 1: And we just. We just want to make that right and make sure that everything's on the up and up.
- **04:13 Speaker 2:** Okay, no problem. I will make sure that I get all the information that I need for you, and I will reach out to you soon. Okay.
- 04:20 Speaker 1: Okay, that sounds good. I appreciate your help.
- 04:22 Speaker 2: You're very welcome. Have a good day.
- 04:24 Speaker 1: You too. Bye.

Call summary:

Summary of Customer Support Conversation:

The customer, Sarah, contacted Odyssey Support to clarify the status of her son Landon's ESA (Education Savings Account) funds. She had applied for ESAs for both her son and daughter, but Landon had not yet switched to a private school, while her daughter was attending. Sarah expressed concern as she received information indicating that Landon's funds were approved and paid to a private school (Unity Ridge) that he had not yet attended, leading her to suspect an error.

Kiana from support confirmed that she would investigate whether Landon's approved funds would still be available for his upcoming attendance at Unity Ridge, which was planned for the next day. Sarah emphasized the urgency of the matter, noting the principal's lack of experience with ESAs and her worries about potential complications in receiving funds. Kiana reassured Sarah that she would reach out to her team for clarification and would follow up via email with updates, including guidance on reimbursement for any prematurely issued funds. The conversation ended on a positive note, with Sarah expressing appreciation for the assistance.

Kyanna R. October 30, 2024 at 08:00

Hi Sara,

Thank you for taking the time to speak with me!

Here is a summary of our conversation:

[The customer, Sara, contacted Odyssey Support to clarify the status of her son Landon's ESA (Education Savings Account) funds. She had applied for ESAs for both her son and daughter, but Landon had not yet switched to a private school, while her daughter was attending. Sara expressed concern as she received information indicating that Landon's funds were approved and paid to a private school (Unity Ridge) that he had not yet attended, leading her to suspect an error.

Kyanna from support confirmed that she would investigate whether Landon's approved funds would still be available for his upcoming attendance at Unity Ridge, which was planned for the next day. Sara emphasized the urgency of the matter, noting the principal's lack of experience with ESAs and her worries about potential complications in receiving funds. Kyanna reassured Sara that she would reach out to her team for clarification and would follow up via email with updates, including guidance on reimbursement for any prematurely issued funds. The conversation ended on a positive note, with Sara expressing appreciation for the assistance.

Regarding your inquiry about Landon's tuition for Unity Ridge Lutheran School, I want to reassure you that there was no error, as you approved the tuition. Landon's boarding process at Unity Ridge should proceed smoothly, and there will be no concerns about the payment for this semester.

If you have any further questions or concerns, please feel free to reach out to us. We're here to help!

Best regards,

Kyanna | Customer Care Associate



Odyssey Automation Bot October 30, 2024 at 08:00

Internal note

This is the summary of the call in ticket #327915

Hi Sara,

Thank you for taking the time to speak with mel

Here is a summary of our conversation:

[The customer, Sara, contacted Odyssey Support to clarify the status of her son Landon's ESA (Education Savings Account) funds. She had applied for ESAs for both her son and daughter, but Landon had not yet switched to a private school, while her daughter was attending. Sara expressed concern as she received information indicating that Landon's funds were approved and paid to a private school (Unity Ridge) that he had not yet attended, leading her to suspect an error.

Kyanna from support confirmed that she would investigate whether Landon's approved funds would still be available for his upcoming attendance at Unity Ridge, which was planned for the next day. Sara emphasized the urgency of the matter, noting the principal's lack of experience with ESAs and her worries about potential complications in receiving funds. Kyanna reassured Sara that she would reach out to her team for clarification and would follow up via email with updates, including guidance on reimbursement for any prematurely issued funds. The conversation ended on a positive note, with Sara expressing appreciation for the assistance.]

Regarding your inquiry about Landon's tuition for Unity Ridge Lutheran School, I want to reassure you that there was no error, as you approved the tuition. Landon's boarding process at Unity Ridge should proceed smoothly, and there will be no concerns about the payment for this semester.

If you have any further questions or concerns, please feel free to reach out to us. We're here to help!

Best regards,

Kyanna | Customer Care Associate



Odyssey Automation Bot October 30, 2024 at 08:00

Internal note

This summary has been sent to ticket #327915

Odyssey Automation Bot October 31, 2024 at 09:02

Hi Sara,

Just a friendly reminder that it's been 24 hours since we last heard from you! We're eager to assist you and ensure everything is on track for your experience with us.

If you need further assistance or have any updates, please let us know! If we don't hear from you, we'll assume everything is resolved and close this ticket.

Thank you for allowing us to support youl ~The Odyssey Support Team

Odyssey Automation Bot



Odyssey Automation Bot November 1, 2024 at 09:03

Hi Sara,

We hope you're doing well! It's been 2 days since we reached out about your ticket concerning **Call with Sara Ferneding**, and we want to make sure we can help you with your issue. This is a gentle nudge that we're still waiting for your response.

Please let us know if you need any help, or if we can mark this ticket as resolved. If we don't hear back in the next 24 hours, we'll assume everything is okay and proceed to close this ticket.

Thanks for being part of the Odyssey community! ~The Odyssey Support Team

Odyssey Automation Bot



Odyssey Automation Bot November 2, 2024 at 09:02

Hi Sara,

This is our final reminder that it's been 3 days since we last heard from you regarding your ticket about **Call with Sara Ferneding** (#327915). We want to ensure you receive the support you need.

Since we haven't received a response, we will go ahead and mark this ticket as solved. If you still need assistance, please don't hesitate to reach out, and a new ticket will be created for you.

We appreciate your understanding! ~The Odyssey Support Team

Odyssey Automation Bot



Support Software by Zendesk



ESA funds availability

1 message

Sara Ferneding fernedings@gmail.com>
To: Odyssey <help.ia@withodyssey.com>

Thu, Oct 24, 2024 at 4:32 PM

I was approved for the ESA funds for my son for the 24-25 school year. I applied incase we were going to switch him to a private school this year. We are hoping to do that now within the next 2 weeks. Are those funds still available since we are half way through the first semester?

What do I need to do to get those funds set up with the private school we want to switch him to?

Thank you, Sara



Request #119763: How would you rate the support you received?

1 message

Odyssey Support <help.ia@withodyssey.com>
Reply-To: Odyssey Support <help.ia@withodyssey.com>
To: Sara Ferneding <fernedings@gmail.com>

Thu, Oct 12, 2023 at 6:01 PM



Hello Sara Ferneding,

We'd love to hear what you think of our customer service. Please take a moment to answer one simple question by clicking either link below:

How would you rate the support you received?

Good, I'm satisfied

Bad, I'm unsatisfied

Here's a reminder of what this request was about:



Haley J (Odyssey) Oct 11, 2023, 10:13 GMT-12

Hi Sara,

Thank you for reaching out to us. If your son switches to the private school, he will still be eligible for the second half of the ESA for the second semester. If you have any further questions or need assistance with anything else, please feel free to let me know. I'm here to help!

Best regards,

Haley

Haley J | Customer Care Associate





Sara Ferneding

Oct 11, 2023, 10:04 GMT-12

My son did not attend the private school as planned at the beginning of the school year

If we switch him to the private school at semester is he still eligible for the 2nd half of the ESA for the 2nd semester?

Sara

On Thu, Sep 28, 2023, 3:06 PM Odyssey <help.ia@withodyssey.com> wrote:



Hi Sara.

Payment of tuition and fees has not yet been approved for the student(s) ESA listed below within the Odyssey Portal:

Student: Landon

In July, approved ESA applicants were asked to log in to the Odyssey portal to select the lowa accredited nonpublic school their student planned to attend for the 2023-2024 school year. The selected nonpublic school then verified your student's enrollment and entered the amount of tuition and fees owed. In order to maintain ESA eligibility, you must log back in to the Odyssey platform to review the tuition and fee amount and confirm or deny payment.

- If payment of tuition and fees is NOT confirmed in the Odyssey platform prior to September 30, 2023, your student's ESA will be closed.
- Questions regarding enrollment status or the billing of tuition and fees should be directed to your student's nonpublic school.
- Questions about the Odyssey platform should be directed to the Odyssey Support Team by replying to this email.

You can find more information regarding the Students First Act ESA program on the Department's ESA web page.

All the best,

The Odyssey Team help.ia@withodyssey.com

No longer want to receive these emails? <u>Unsubscribe</u>. Odyssey 228 Park Ave S PMB #18249 New York, NY 10003



This email is a service from Odyssey.

[PKGN02-J9VWN]



Congratulations! Iowa Students First ESA Application Approved

2 messages

help.ia@withodyssey.com <help.ia@withodyssey.com> To: fernedings@gmail.com Tue, Apr 23, 2024 at 10:24 AM



Hi Sara,

Congratulations! Your student, Landon, has been approved for Iowa's 2024-25 Students First Education Savings Account (ESA). Please read below for important program information.

Next Steps for Parents:

The next step in the ESA program is to select the accredited nonpublic school your student plans to attend for the 2024-25 school year. Please log in to your Odyssey Portal to begin.

Next Steps for Schools:

Once you have selected your student's school of choice, the school will either confirm or deny the student's enrollment.

If enrollment is confirmed, the school will be able to charge related tuition and fees through the Odyssey Portal.

Approving Tuition and Fees

In your Odyssey Portal you will need to confirm the amount of tuition and fees charged by the nonpublic school.

- This step MUST be completed for BOTH Fall AND Spring semesters in order to maintain your student's ESA eligibility.
- Fall funding will be available beginning July 15, 2024.
 - Tuition and fees approved prior to July 15 will be paid beginning July 15.
- Fall ESA tuition and fee deadline is September 30, 2024.
- Spring funding will be available beginning December 1, 2024.
- Spring ESA tuition and fee deadline is February 1, 2025.

Please note these deadlines relate ONLY to Iowa's Students First ESA program.

Your school may have different due dates.

Using the Marketplace

Any ESA funds remaining after tuition and fees are paid in full will be available to use in the Odyssey Marketplace. The Marketplace is accessible through your Odyssey Portal. A list of eligible expenses is

available on the ESA website under the section "Information for Families".

ESA Program vs School Enrollment

Choosing a school through Odyssey's Portal does NOT guarantee your student either acceptance nor enrollment in that school.

lowa's accredited nonpublic schools have individual admissions processes which are unrelated to lowa's Students First ESA program application process.

If you have any questions, please contact the Odyssey Support Team by replying to this email or by phone at 515-368-9564.

All the best,
The Odyssey Team
help.ia@withodyssey.com

Unsubscribe - Unsubscribe Preferences

help.ia@withodyssey.com <help.ia@withodyssey.com> To: fernedings@gmail.com Tue, Apr 23, 2024 at 10:24 AM



Hi Sara,

Congratulations! Your student, Morgan, has been approved for Iowa's 2024-25 Students First Education Savings Account (ESA). Please read below for important program information.

[Quoted text hidden]

Unsubscribe - Unsubscribe Preferences