

## **THE GI BILL PAYS FOR DEGREES THAT DO NOT LEAD TO A JOB**

### **Issue**

Unfortunately, some programs approved for GI Bill benefits leave graduates *de facto* ineligible to obtain a job in their field of study because the school (1) lacks the appropriate accreditation or (2) fails to meet state-specific criteria required for certification or licensure. In addition, some graduates may be technically eligible to obtain a job in the field of study, but are not hired because they are unable to obtain the professional certifications that employers strongly prefer. The programs at issue range from law to teaching, criminal justice, and numerous healthcare fields, including nursing, psychology, medical assisting, dental assisting, and surgical technology.

The fiscal year 2014 National Defense Authorization Act requires schools that participate in DOD's Tuition Assistance program to meet the instructional curriculum licensure and certification requirement of each state if the schools program is designed to prepare individuals for state licensure or certification.<sup>1</sup> To relieve the administrative burden of enforcing this requirement, DOD officials told us that it requires schools to certify that they are in compliance. We believe that it is critical for Congress to extend these same bipartisan protections to veterans using GI Bill benefits.

### **Findings**

Based on a limited sample of veterans' complaints and lawsuits by state law enforcement agencies, our research identified 8 degree-programs offered by 15 different schools at both brick and mortar campuses and online that failed to meet state or employer requirements, leaving graduates ineligible to work in their field of study. Yet, veterans are able to enroll in these programs at about 60 campuses across the country. Overall, GI Bill approved programs at about 20 percent of the 300 campuses that we examined did not qualify graduates for state licensure or certification. A description of our methodology may be found at the end of this document.

These degree programs represent the tip of the iceberg because we examined only some of the programs that were the subject of veteran complaints or state Attorneys General lawsuits; additional programs may also leave veterans ineligible to work in their field of study. For example, at the end of May, the U.S. Federal Trade Commission (FTC) announced a settlement with Ashworth College for misleading students about programs that "failed to meet the basic educational requirements set by state licensing boards for careers or jobs" in numerous states because they lacked the proper accreditation.<sup>2</sup> FTC noted that Ashworth's programs were eligible for GI Bill dollars, but not for federal

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<sup>1</sup>P.L. 113-66.

<sup>2</sup><https://www.ftc.gov/system/files/documents/cases/150526ashworthcollegecmpt.pdf>

student loans, and that Ashworth targeted veterans and service members for recruiting, including through recruiters posing as "military advisors."

**Sample of Degree Programs Approved for GI Bill Benefits that Don't Lead to Jobs in Those Fields**

<b>Degree</b>	<b>Sample of GI Bill-approved campuses identified through veteran complaints or lawsuits with degree programs that don't satisfy job requirements</b>	<b>Why degree doesn't lead to a job</b>	<b>Related Lawsuit</b>
Law	7 (online (3), CA (4)) <sup>a</sup>	not ABA accredited <sup>b</sup>	
Clinical Psychology (PhD)	2 (WA, FL)	not APA accredited <sup>c</sup>	CO AG
	MN	not APA accredited	CT
Teaching (early childhood)	IA, online	not state board of education approved	IA AG
Nursing	2 FL	not state board of nursing approved	NM AG
Criminal Justice	Boise	police dept. requires regional accreditation	
	4 (Tampa, St. Petersburg, IL (2))	police dept. requires regional accreditation	
	4 (IL)	police dept. requires regional accreditation	IL AG
Dental Assisting	18 (TX (9), CA (9))	not state dentistry board approved <sup>d</sup>	
Medical Assisting	3 (CA)	lacks the program accreditation required to attain the certification employers prefer	
	4 (NE, OH (2), WI)	lacks the program accreditation required to attain the certification employers prefer	MN AG
	8 (CO, MO, NE, OK, TX (4))	lacks the program accreditation required to attain the certification employers prefer	
Surgical Technology	KS, MO	lacks the program accreditation/approval required to attain the certification employers prefer <sup>e</sup>	NY AG

Source: Research by Veterans Education Success.

<sup>a</sup>There are a total of 6 law schools but 7 online/campus-based programs because one law school offers both online and campus-based degrees.

<sup>b</sup>American Bar Association. ABA accreditation is not required to sit for the bar in California and several other states. However, graduates are required to undergo several years of mentoring by a licensed lawyer in order to take the bar exam.

<sup>c</sup>American Psychological Association.

<sup>d</sup>Texas requires dental assistants who perform x-rays to be state registered but none of Kaplan's 9 Texas campuses are approved by the state dentistry board. California's dentistry board requires dental assistants to attend a state approved school to perform four different procedures but Kaplan is only approved for one of the four procedures.

<sup>e</sup>Two organizations offer a certification exam for surgical technology—the National Board of Surgical Technology and Surgical Assisting and the National Center for Certification Testing. The former requires schools to have programmatic accreditation to sit for the exam while the latter requires graduation from an "authorized" school.

## **Background on Accreditation**

The Department of Veterans Affairs and its partner, State Approving Agencies, approve programs for GI Bill benefits, relying in part on accreditation. The Education Department recognizes accrediting agencies. Accreditation signifies that an institution maintains standards requisite for its graduates to gain admission to other reputable institutions of higher learning or to achieve credentials for professional practice.

There are two types of accrediting bodies—institutional and “specialized,” programmatic accrediting agencies. In general, institutional accreditation, not programmatic accreditation, is a prerequisite for a school to participate in the federal student aid program.<sup>3</sup>

- *Institutional accrediting organizations* are either regionally based (accrediting schools in their geographic region) or national in scope (accrediting schools that have multiple campuses across the country).<sup>4</sup>
- *Specialized accrediting agencies* focus on specific degrees offered by schools or by a department or college within a larger university.<sup>5</sup> Some of these specialized agencies accredit distance education programs.<sup>6</sup>

For example, Harvard University is accredited as an institution, while its law school is accredited by the American Bar Association, which is the specialized accrediting body with sole jurisdiction over accreditation of U.S. law schools.

*How Institutional Accreditation Affects Veterans.* In some cases the type of institutional accreditation can affect the ability of a school’s graduates to obtain a job in their field of study. For example:

- Police departments increasingly require an Associates degree from an accredited school. For some jobs, students must graduate from a *regionally* accredited school in order to obtain the required state certification or licensure.
- In order to be licensed to teach in any other states, individuals must graduate from a *regionally* accredited school with a state-approved teacher preparation program.<sup>7</sup> In addition, states have additional requirements. For example, in New Jersey graduates must then pass a certification exam in order to receive a provisional teaching certificate. With this certificate, graduates can be hired by a school district where they receive mentoring, supervision, and evaluation before earning a permanent teaching certificate.

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<sup>3</sup>Although the Education Department’s College Navigator website provides information on institutional accreditation, it has very spotty data on schools’ programmatic accreditation.

<sup>4</sup>[http://www2.ed.gov/admins/finaid/accred/accreditation\\_pg6.html](http://www2.ed.gov/admins/finaid/accred/accreditation_pg6.html)

<sup>5</sup>See <http://ope.ed.gov/accreditation/FAQAccr.aspx>. See this link for a list of the specialized accrediting agencies: [http://www2.ed.gov/admins/finaid/accred/accreditation\\_pg7.html](http://www2.ed.gov/admins/finaid/accred/accreditation_pg7.html)

<sup>6</sup>[http://www2.ed.gov/admins/finaid/accred/accreditation\\_pg10.html](http://www2.ed.gov/admins/finaid/accred/accreditation_pg10.html)

<sup>7</sup>Interview with the Director of Accreditation, CAEP.

*How Specialized Accrediting Agencies Affect Veterans.* For some jobs, institutional accreditation may be insufficient; programmatic accreditation by a specialized accrediting organization may be necessary to gain employment. For example:

- Law school graduates must have matriculated at a school accredited by the American Bar Association in order to sit for the Bar Examination in nearly every state, and passing the Bar Exam is required in most states to practice law.
- Accreditation by the American Psychological Association is required to become a licensed clinical psychologist.

*State/Employer Preference.* Some states and employers may not require, but strongly prefer, schools to be programmatically accredited.<sup>8</sup> For example:

- State nursing boards may take programmatic accreditation into consideration when determining which schools' nursing programs are approved. Only graduates of approved nursing programs can sit for a state's licensing exam.
- Employers may also prefer to hire graduates from programmatically accredited schools and offer such graduates higher salaries.

## **DEGREES THAT REQUIRE PROGRAMMATIC ACCREDITATION**

### **Law**

Passing the bar exam allows graduates to be licensed to practice law in that state. The vast majority of U.S. bar admission associations rely on accreditation by the American Bar Association (ABA) to determine whether their legal education requirement for admission to the bar is satisfied. Education at an ABA-approved law school meets the requirements in every jurisdiction in the United States.<sup>9</sup> California, Washington, Vermont, and Virginia provide an alternative route to legal practice in addition to attending a traditional, ABA-approved, law school. This alternate route, referred to as "law office reading," allows individuals to skip law school and instead apprentice for several years with a licensed lawyer. Veterans pursuing this alternate route do not need to attend law school or use up their GI Bill and incur debt. Their bar-exam pass rates are significantly lower than for law school graduates.<sup>10</sup>

The following sample of law schools are not accredited by the American Bar Association but are approved to receive GI Bill educational benefits.<sup>11</sup> All six schools are located in California which does not require ABA accreditation for graduates to take the bar exam,

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<sup>8</sup>Employers' human resources departments caution students to make sure they are enrolling in programs with the proper accreditation, a seal of approval that many bosses look for. See

<https://sites.google.com/site/commonsensedemocracyfoundation/recent-articles/idahoansareflockingtoexpensivefor-profitschools>

<sup>9</sup>[http://www.americanbar.org/groups/legal\\_education/resources/distance\\_education.html](http://www.americanbar.org/groups/legal_education/resources/distance_education.html)

<sup>10</sup>[http://www.slate.com/blogs/business\\_insider/2014/08/02/states\\_that\\_allow\\_bar\\_exams\\_without\\_law\\_degrees\\_require\\_apprenticeships.html](http://www.slate.com/blogs/business_insider/2014/08/02/states_that_allow_bar_exams_without_law_degrees_require_apprenticeships.html)

<sup>11</sup>[http://www.americanbar.org/groups/legal\\_education/resources/aba\\_approved\\_law\\_schools/official-guide-to-aba-approved-law-schools.html](http://www.americanbar.org/groups/legal_education/resources/aba_approved_law_schools/official-guide-to-aba-approved-law-schools.html)

but does require additional steps.<sup>12</sup> In July 2015, the Los Angeles Times reported that 9 in 10 students drop out of unaccredited for-profit law schools and only 1 in 5 graduates actually become lawyers.<sup>13</sup> Subsequently, the California Bar Association announced plans to require unaccredited law schools to report their dropout rates in order to increase transparency.<sup>14</sup>

There may be additional law schools that do not meet accreditation requirements, as this limited sample arose from veteran complaints or lawsuits.

- Abraham Lincoln University’s Juris Doctor law degree program.<sup>15</sup>
  - 25 veterans enrolled during CY 2014. VA paid tuition and fees for 17 veterans in FY 2014 totaling \$71,488.
- California Southern University’s Juris Doctor law degree program.<sup>16</sup>
  - 10 veterans enrolled during CY 2014. VA paid tuition and fees for 6 veterans in FY 2014 totaling \$37,965.
- Concord Law School’s Juris Doctor law degree program.<sup>17</sup>
  - 48 veterans enrolled during CY 2014. VA paid tuition and fees for 25 veterans in FY 2014 totaling \$225,000.
- Irvine University’s Juris Doctor law degree program.<sup>18</sup>
  - 4 veterans enrolled as of April 2015. VA paid tuition and fees paid for 3 veterans in FY 2014 totaling \$15,045.
- Pacific West College of Law’s Juris Doctor law degree program.<sup>19</sup>
  - 2 veterans enrolled as of April 2015. FY 14 tuition and fees paid for 1 veteran totaled \$7,476.

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<sup>12</sup>The State Bar of California recognizes three different categories of law schools: ABA-accredited schools, state-accredited schools, and unaccredited schools. In most states, a degree from an ABA-accredited law school is a prerequisite for eligibility to take the bar examination, but California has its own system for accrediting law schools and allows graduates of these state-accredited schools (also called Committee-accredited schools, since the body accrediting them is the Committee of Bar Examiners) to sit the bar upon completion of their degrees alongside graduates of ABA-accredited schools. The Committee also allows graduates of unaccredited law schools to sit the bar, but students at these schools are required to take the First-Year Law Students' Examination, also called the Baby Bar, in order to proceed past their 1<sup>st</sup> year in law school. See <http://www.top-law-schools.com/californias-law-school-baby-bar.html>

<sup>13</sup><http://www.latimes.com/local/education/la-me-law-schools-20150726-story.html>

<sup>14</sup><http://www.latimes.com/local/education/la-me-law-schools-20150829-story.html>

<sup>15</sup>This law school only offers online classes. It’s website states that it is accredited by the Distance Education and Training Council but does not acknowledge that the school lacks ABA accreditation. During a live chat, VES asked if a graduate could sit for the bar exam in Iowa and the response was to contact the bar admission authorities in that state. “I cannot advise you about other state bars, unfortunately.”

<sup>16</sup>This school offers both campus-based and online degrees.

<sup>17</sup>Concord law school is an online program.

<sup>18</sup>Irvine’s law program is campus based.

<sup>19</sup>Pacific West’s law program is campus based.

- University of San Luis Obispo Juris Doctor law degree program.<sup>20</sup>
  - 1 veteran enrolled as of April 2015. FY 14 tuition and fees paid for 1 veteran totaled \$3,240.

#### **Law School Student Testimonial**

“I could have tried to transfer, but I had heard from many sources that [Concord] credits rarely transferred. The most important bit of knowledge I gained during this time was from a one-term adjunct instructor, who, when I told her of my plan to continue my education through Concord Law School, informed me that the school was not recognized in Iowa for taking the Bar exam. That information was eye opening. The Dean apparently didn't know or forgot to mention this little problem with Concord.”  
 Student Eric Schmitt, U.S. Senate Testimony: <http://www.help.senate.gov/imo/media/doc/Schmitt.pdf>

## **Psychology**

To be licensed as a clinical psychologist, students must graduate from a doctoral program accredited by the American Psychological Association (APA).

The following programs do not meet accreditation requirements. There may be additional programs that also do not meet accreditation requirements, as this limited sample arose from veteran complaints or lawsuits.

- Argosy University PhD in clinical psychology is GI Bill approved for 11 campuses (including its online program). The online and 8 of the campus-based doctoral programs are APA accredited (CA, GA, HI, IL, MN, and VA). Its doctoral programs in Washington state and Florida lack APA accreditation.
  - GI Bill approved, but **not** APA accredited at campuses in WA and FL.
- Walden’s PhD in Psychology is not accredited by the APA.
  - GI Bill approved, but **not** APA accredited for its MN campus

#### **Colorado Attorney General’s Lawsuit**

Argosy’s lack of proper accreditation for its PhD in psychology left its graduates ineligible to become licensed Psychologists. This was the topic of a successful lawsuit by the Colorado Attorney General, which reached a \$3.3 million settlement with the school. The AG's office said Argosy admitted it planned to apply for APA accreditation for the PsyD program but never did. The company also said it never intended to apply for APA accreditation because the APA doesn't accredit programs that meet only on the weekends.

<http://www.bizjournals.com/denver/news/2013/12/05/argosy-university-pays-colorado-33m.html>

#### **Private Connecticut Lawsuit**

The U.S. District Court refused to dismiss a lawsuit against Walden brought by a graduate of the school’s PhD psychology program. Although the plaintiff was told he could become a licensed psychologist, he learned that Walden did not have the appropriate accreditation when he applied to take Connecticut’s licensing exam.

<http://law.justia.com/cases/federal/district-courts/connecticut/ctdce/3:2008cv00045/80151/36/>

<sup>20</sup>San Luis Obispo’s law program is campus based. The school’s website clearly states that it is unaccredited and spells out the steps students must take to sit for the bar in California.

## DEGREE PROGRAMS THAT REQUIRE STATE-LEVEL APPROVAL

### Teaching

States, not specialized accrediting agencies, are responsible for approving teacher education programs. Programmatic accreditation by the Teachers Education Accreditation Council (TEAC) or the National Council on Accreditation of Teacher Education (NCATE) is only one of a number of factors that states may take into consideration when approving teacher education programs.<sup>21</sup>

The following programs do not meet accreditation requirements. There may be additional programs that also do not meet accreditation requirements, as this limited sample arose from veteran complaints or lawsuits.

Ashford University is not TEAC or NCATE accredited but has institutional accreditation from the Western Accreditation of Schools and Colleges, a regional accrediting agency. All states, including Iowa, require teachers to graduate from regionally accredited schools; Iowa has approved Ashford's elementary and secondary teacher education programs up to the Bachelor's degree level.<sup>22</sup> However, Iowa has not approved Ashford's early childhood education program.

- Ashford University's online early childhood education program does not allow graduates to become classroom teachers without additional classroom time.
  - Ashford's early childhood online degree is approved for GI Bill benefits at its Iowa campus and online but graduation **does not** result in licensure.

#### Iowa Attorney General's Lawsuit

In May 2014, the Iowa Attorney General reached a \$7.25 million settlement with Ashford over allegations that the school's marketers told prospective students that an online Ashford education degree would allow them to become classroom teachers when, in fact, many Ashford graduates are subject to additional requirements that may require additional time, more coursework, or additional money.

After the settlement, Ashford acknowledged that its early education degree did not lead to licensure or certification in any state.

[http://qctimes.com/news/local/government-and-politics/ashford-agrees-to-million-iowa-settlement/article\\_87739f8e-8445-51d6-b32f-1fa741874faf.html](http://qctimes.com/news/local/government-and-politics/ashford-agrees-to-million-iowa-settlement/article_87739f8e-8445-51d6-b32f-1fa741874faf.html)

### Nursing

As with teacher education, states (not specialized accrediting agencies) are responsible for approving nursing education programs.<sup>23</sup> In general, states review and approve "pre-licensure" nursing programs—not programs where existing RNs enroll to earn more

<sup>21</sup>TEAC and NCATE are merging to create the Council on Accreditation of Education Programs (CAEP).

<sup>22</sup>See <http://www.boee.iowa.gov/require.html>

<sup>23</sup>See <https://www.ncsbn.org/665.htm>

advanced credentials such as Bachelors or Masters degrees. The graduate of a state Board of Nursing (BON) approved program may be able to obtain a nursing license in a different state through endorsement (reciprocity) or because it is a compact state that recognizes licenses obtained in other compact states.<sup>24</sup> Endorsement is not automatic. According to the Texas BON, every state has different practice regulations based on the needs of its population, which the state takes into consideration in approving endorsements. In addition, applicants must meet the same standards as those required of Texas nurses.<sup>25</sup> Although applicants can't sit for the licensing exam in Texas if they graduated from an approved nursing program in different state, California permits this route to licensure.<sup>26</sup>

National nursing accreditation is a voluntary process intended to strengthen education quality by measuring schools' performance against nationally recognized standards. The Accreditation Commission for Education in Nursing (ACEN) accredits diploma programs, practical nurse programs, associate programs, bachelors, and masters programs. Another national nursing accrediting agency, the Commission on Collegiate Nursing Education (CCNE), focuses on baccalaureate, graduate, and residency programs in nursing.<sup>27</sup> Accreditation in nursing is important, as it generally requires a certain level of licensure exam pass rates, thereby ensuring the nation's nurses bring a level of quality.

Although national accreditation by a specialized accrediting agency is not required to obtain a nursing license, there is a potential downside in attending a non-accredited nursing program. While you may receive a quality education and be eligible to sit for and pass the NCLEX licensing examination, it generally does imply that you will not be qualified to attend an accredited nursing school in pursuit of additional education (for example, an RN-to-BSN or a master's degree program). That, in turn, might limit your progression in your professional nursing career.<sup>28</sup>

The following programs do not meet accreditation requirements. There may be additional programs that also do not meet accreditation requirements, as this limited sample arose from veteran complaints or lawsuits.

ITT Tech offers Associates degrees in nursing at 40 campuses all of which are approved for GI Bill benefits. None of ITT's nursing programs are accredited by the national nursing accrediting agency, CCNE.

- ITT Tech's Associates degree in nursing has state Board of Nursing approval or initial approval at 24 of its 40 campuses.<sup>29</sup> Of the remaining campuses, however, 2 lack state Board of Nursing approval and their graduates cannot sit for the state licensure exam; 14 campuses are subject to increased scrutiny (consent

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<sup>24</sup><https://www.ncsbn.org/nurse-licensure-compact.htm>

<sup>25</sup>[https://www.bon.texas.gov/licensure\\_endorsement.asp](https://www.bon.texas.gov/licensure_endorsement.asp)

<sup>26</sup><http://www.rn.ca.gov/applicants/lic-end.shtml>

<sup>27</sup>See [http://nmbon.sks.com/Approval\\_and\\_Accreditation.aspx](http://nmbon.sks.com/Approval_and_Accreditation.aspx).

<sup>28</sup> <http://www.allnursingschools.com/nursing-careers/article/nursing-school-accreditation/>

<sup>29</sup>Initial approval allows graduates to sit for state licensure.



agreements), conditional approval (enrollment suspended), or probationary status (low licensure pass rates). Again, all 40 ITT campuses are approved for GI Bill benefits.

- 2 ITT Florida campuses are GI Bill approved but graduates cannot obtain a license in that state.

#### **New Mexico Attorney General's Lawsuit**

The New Mexico 2014 lawsuit alleges that ITT's nursing program has never been accredited by the Accreditation Commission for Education in Nursing, the organization that accredits associate degree nursing programs. In addition, it alleges ITT misled its New Mexico students into believing that the Nursing program was accredited.

<http://www.bizjournals.com/albuquerque/news/2014/02/27/ags-office-sues-itt-educational.html>

#### **Veteran Student Testimonial**

*"I feel I was misled in my education path. I wanted to be a registered nurse. University of Phoenix stated they could get me there, but most of my credits did not transfer and did not bring me much closer to my ultimate goal."*

Eric L., who served in Iraq (March 2015 complaint received by Veterans Education Success)

## **Criminal Justice**

State legislature or boards may set the minimum educational standards for police officers, but local police agencies are free to set higher educational standards. As a result, determining whether applicants meet a police agency's educational standards requires considerable research and ultimately may require applicants to contact police agencies directly.<sup>30</sup> In addition to state and local education standards, it may be considered a plus if a school's program is acknowledged by the Academy of Criminal Justice Sciences, an international body for certifying criminal justice education programs.<sup>31</sup>

Some police agencies only require a high school degree, but often look favorably upon candidates with college experience.<sup>32</sup> Police agencies increasingly require some college credits, but allow exceptions to college requirements for those with military service or prior law enforcement experience.<sup>33</sup> In general, police agencies that require applicants to have college credits specify that credits be from an "accredited" school. Some police agencies, however, require degrees or credits from *regionally accredited* schools, such as the Illinois State Police; the DuPage and Will County, Illinois sheriffs offices; the Schaumburg, Illinois, police department; the Tampa, Florida, police department; the

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<sup>30</sup>See <http://www.how-to-become-a-police-officer.com/states/texas/>. For example, in Florida and Washington state minimum educational requirements are laid out in statute. See <http://www.how-to-become-a-police-officer.com/states/florida/> and <http://apps.leg.wa.gov/WAC/default.aspx?cite=139-07-020>. In Illinois, the Illinois State Police Merit Board establishes the basic standards (<http://www.how-to-become-a-police-officer.com/states/illinois/> )

<sup>31</sup><http://www.excite.com/education/states/ohio/criminal-justice-schools-in-ohio>

<sup>32</sup>Although police departments may only require candidates to have a high school diploma or GED, college graduates may receive special consideration during the hiring process, as well as higher starting salaries.

See <http://www.lawenforcementedu.net/ohio/ohio-schools/#context/api/listings/prefilter> and <http://www.how-to-become-a-police-officer.com/states/florida/>

<sup>33</sup><http://www.how-to-become-a-police-officer.com/#cities> See also [http://www.acjs.org/pubs/167\\_667\\_3517.cfm](http://www.acjs.org/pubs/167_667_3517.cfm)

Boise, Idaho police department; Texas state troopers and highway patrol officers; and many other county and local police departments.<sup>34</sup>

The Chicago police department required regional accreditation until about 2010 but subsequently limited the requirement to “accredited” schools. According to one state Attorney General’s office, college accreditation requirements may be generally stated, but hiring preferences may favor local community college degree programs because their graduation requirements are more rigorous and include courses in writing and math, in addition to criminal justice courses.

The following programs do not meet accreditation requirements. There may be additional programs that also do not meet accreditation requirements, as this limited sample arose from veteran complaints or lawsuits.

Brown Mackie, ITT Tech, and Westwood College offer criminal justice degrees at numerous campuses across the U.S. that are approved for GI Bill benefits. All three schools have national rather than regional accreditation, which would satisfy the educational requirements of some police departments but not others. For example, the following police departments require degrees from regionally accredited schools:

- A graduate of ITT’s criminal justice program in Tampa could not obtain a job with the Tampa police department because it requires degrees from regionally accredited schools. (Graduates would likely meet the requirements in several other Florida cities.<sup>35</sup>)
- A graduate of ITT’s criminal justice program in St. Petersburg, Florida, must contact that police department to determine if ITT is an “approved accredited college or university.”<sup>36</sup>
- A graduate of Brown Mackie’s criminal justice program in Boise, Idaho could not obtain a job with that city’s police department.<sup>37</sup>
- A graduate of ITT’s or Westwood’s criminal justice programs would meet the educational requirements for employment by the Chicago police department but not for employment by the Illinois State Police; the DuPage and Will County, Illinois, sheriffs offices; or the Schaumburg, Illinois, police department.

**Illinois Attorney General’s Lawsuit**

The Illinois Attorney General alleged in its 2014 lawsuit that Westwood misled students by falsely claiming that its criminal justice program (1) was regionally accredited; (2) graduates are eligible to be hired as federal, state or local police officers in Illinois; (3) most graduates obtain law enforcement jobs, (4) graduates earn about \$20,000.00 more per year than people with just a high school diploma, (5) graduates can obtain employment in law enforcement even if possessing a criminal record;

<sup>34</sup>See <https://www.illinoisrooper.com/recruitment/pre-employment-requirements/> ; <http://www.cfpbmonitor.com/files/2014/11/IL-AG-second-amended-complaint.pdf> ; <http://www.ci.schaumburg.il.us/emp/employ1/Documents/Recruiting%20Brochure-12.2013.pdf> ; <http://www.how-to-become-a-police-officer.com/states/florida/> ; <http://police.cityofboise.org/home/join-bpd/>

<sup>35</sup><http://www.how-to-become-a-police-officer.com/states/florida/>

<sup>36</sup><http://old.stpete.org/police/employment/police/police-selection-standards.html>

<sup>37</sup><http://police.cityofboise.org/home/join-bpd/>

and (6) degrees lead to employment with the FBI and State Police. None of these claims are true.  
<http://www.cfpbmonitor.com/files/2014/11/IL-AG-second-amended-complaint.pdf>

#### **Veteran Student Testimonials**

- *"When I attempted to transfer my units (in private and public sector security) from Brown Mackie to Pasadena City College in California, I found out that none of my units transferred because they didn't have the right level of accreditation. Not only did Brown Mackie lie about their accreditation level but they lied about (the) level of education they offer... I have a debt with nothing to show for it and am struggling to stay afloat."* Marine Corporal Anselm Caddell, Veterans Student Loan Relief Fund Fact Sheet
- *"I specifically asked ITT Tech before signing up whether their degree was the same as any other public 4-year university and was told YES. I found out while applying at NYPD, LAPD, Seattle PD and 23 other police departments that NONE of them accepted ITT Tech credits. Once I found out that my time and money spent at ITT Tech was worthless, I tried to transfer my credits to a community college. I was told I have to start completely over as a freshman."* Marine Specialist Bryan Babcock, Veterans Student Loan Relief Fund Fact Sheet<sup>38</sup>
- *"I went to ITT tech because I wanted to be a Drug Enforcement Agent and was told my credits would count and transfer. Well after I graduated with a two year degree, I was told the schooling I looked into after did not take their credits and I am stuck with a \$46,000 school loan when the GI bill should have paid for all of it."* Roland P. of Pennsylvania, who attended from 2012-2014 (May 2015 complaint received by Veterans Education Success)

Veteran complaints suggest that other criminal justice programs may also not lead to the jobs that veterans have studied for.

#### **Additional Veteran Student Testimonials**

- *"I was told when I attended [Colorado Tech U in 2013] that any [police] department would accept their degree. Upon asking someone I knew that worked for the Georgia Department of Corrections, I was informed they do not and that they only accepted degrees from traditionally accredited universities."* Anthony B. of Georgia (May 2015 complaint received by Veterans Education Success)
- *"I was enrolled at Colorado Tech U for 4 years. No post graduation job opportunities happened. I have a BA in Criminal Justice and an Associates Degree in Accounting. Have not been able to utilize either one."* Debbie L. of Tennessee (May 2015 complaint received by Veterans Education Success)
- *"I was initially recruited at a job fair and was told that University of Phoenix was fully accredited and all law enforcement agencies accept this is a viable degree. I have applied for over 100 probation officer jobs and rarely ever get a call back. I spoke with a recruiter once that told me I would have a very difficult time finding a job in probation with that degree and he was right. I owe over \$40K in student loans and can't get a job in the career field I trained so long to do."* Bryan H. of Texas (May 2015 complaint received by Veterans Education Success)
- *"I was told that there were many opportunities for a veteran in private security and law enforcement by the University of Phoenix with a degree in criminal justice. I was unable to find any willing to accept my level or training or background. So I had to change degrees [but] none of the credits were transferable. The quality of the classes was terrible, teachers "participation*

<sup>38</sup>Specialist Babcock attended ITT prior to 2010. Since then, some police departments, such as Chicago's, have relaxed their requirements and now require graduation from an "accredited" school.

*requirements" making no sense and off of very limited information with little actual teaching. I wasted time and money for a school who couldn't make good on their educational promises."*  
Michael F. of Ohio (May 2015 complaint received by Veterans Education Success)

## Dental Assistant

Programs for dental assistants are regulated by state dentistry boards. Kaplan offers a dental assistant certificate at campuses in California, Indiana, Tennessee, and Texas, which are approved for the GI Bill.<sup>39</sup> The Dentistry Boards in these four states require dental assistants to be state registered and to have graduated from a state approved dental assistant program or one accredited by the Commission on Dental Accreditation (CODA). As described below, a Kaplan graduate cannot perform the full range of duties of a dental assistant in Texas, California, Indiana, and Tennessee.

The following programs do not meet accreditation requirements. There may be additional programs that also do not meet accreditation requirements, as this limited sample arose from veteran complaints or lawsuits.

- 9 Kaplan campuses in Texas are GI Bill approved but lack state approval to perform x-rays. In Texas, dental assistants who perform x-rays must attend a state-approved program to obtain the required registration. None of Kaplan's 9 Texas campuses have state approval.<sup>40</sup>
- 9 Kaplan campuses in California are GI Bill approved but lack state approval for some procedures. California requires dental assistants to attend state-approved schools for 4 different procedures. Nine Kaplan California campuses are approved for application of "pitt and fissure sealants" but none are approved for coronal polishing, x-rays, or ultrasound scaling.<sup>41</sup>
- 1 Kaplan campus in Indiana is GI Bill approved and the program is accredited by CODA. However, the procedures that graduates may perform are limited to applying sealants and coronal polishing.<sup>42</sup>
- 1 Kaplan campus in Tennessee is GI Bill approved and approved by the state dental board. However, the procedures Kaplan graduates can perform may be limited because the state requires that they have taken specific classes and then complete state approved training.<sup>43</sup>

### Eyewitness News: WSOC TV

Students at for-profit [Kaplan College](#) say they were misled for months about the school's dental assistant program. Eyewitness News reporter Jim Bradley has been investigating their claims, taking them to state regulators and questioning college leaders.

<sup>39</sup>One of Kaplan's programs in Indiana offers an AAS dental assistant degree.

<sup>40</sup>[http://www.tsbde.state.tx.us/index.php?option=com\\_content&task=view&id=32&Itemid=26#Career%20School%20Graduates](http://www.tsbde.state.tx.us/index.php?option=com_content&task=view&id=32&Itemid=26#Career%20School%20Graduates)

<sup>41</sup>[http://www.dbc.ca.gov/licensees/rda/certificates\\_pfs.shtml](http://www.dbc.ca.gov/licensees/rda/certificates_pfs.shtml)

<sup>42</sup><http://www.in.gov/pla/3162.htm>

<sup>43</sup>See <http://www.dalefoundation.org/resources-and-state-requirements/State-Dental-Assistant-Requirements/Tennessee> and <http://health.state.tn.us/boards/dentistry/education.htm#Registration>

The students admitted they signed a disclosure form in which Kaplan makes clear its program is not approved by CODA, the National Commission on Dental Accreditation. But the students all said Kaplan counselors assured them it soon would be.

“They told me they were in the process of becoming CODA accredited, that it was already in the making, that they would be accredited by the next month,” Nesbitt said.

That was last March. But it wasn't until a month ago, as many of the students approached the end of their training, that they were told the program wasn't accredited at all.

The impact of that news was huge for students. Going through an accredited program is one of the ways to become eligible to be nationally certified -- and employable -- at the higher level, and better-paid position, called Dental Assistant 2.

Since Kaplan's dental assistant program is not accredited, current Kaplan students would have to work in a dentist office as a DA 1 for 3,000 hours -- essentially two years -- to become qualified as Dental Assistant 2s.

But since the dental assistant program at Kaplan's Charlotte location isn't accredited, students are now being told they'll graduate as entry level dental assistants -- or DA1s -- who earn lower salaries, making the whistleblowers worried about being able to repay the loans they took out to cover a portion of their \$18,000 tuition.

But Whistleblower 9's investigation uncovered a startling revelation. Not only is Kaplan's dental assisting program not about to complete the year-long accreditation process -- Kaplan has yet to even apply for accreditation for that program.

... after Eyewitness News began asking Kaplan questions about its dental assistant program, the company emailed this offer to students: To fully refund the cost of their tuition, books, fees and supplies. Waive all costs for the remainder of their dental assisting classes. Provide a stipend after graduation.

<http://www.wsocvtv.com/news/news/whistleblower-9-students-say-they-were-misled-by-1/nGSy3/>

## **DEGREES FOR WHICH CERTIFICATION MAY BE PREFERRED BY EMPLOYERS**

### **Medical Assistant**

Medical assistants work alongside physicians, mainly in outpatient or ambulatory care facilities, such as medical offices and clinics.<sup>44</sup> Graduates of medical assisting programs accredited by the Commission on Accreditation of Allied Health Education Programs (CAAHEP) or the Accrediting Bureau of Health Education Schools (ABHES) are eligible to take a certification exam offered by the American Association of Medical Assistants (AAMA).<sup>45</sup> According to the AAMA, many employers of allied health personnel require, or at least prefer, that their medical assistants be certified, as a protection against lawsuits alleging that they employ unqualified allied health personnel.<sup>46</sup> Although some states

<sup>44</sup>[http://www.aama-ntl.org/medical-assisting/what-is-a-medical-assistant#.VWM5\\_InBzGc](http://www.aama-ntl.org/medical-assisting/what-is-a-medical-assistant#.VWM5_InBzGc)

<sup>45</sup><http://www.aama-ntl.org/cma-aama-exam/application-steps/eligibility>

<sup>46</sup><http://www.aama-ntl.org/medical-assisting/what-is-a-medical-assistant#.VWM7GFnBzGc>

require education and/or credentialing as a legal prerequisite for the performance of certain duties, medical assistants are currently not licensed in most states.<sup>47</sup>

The following programs do not meet accreditation requirements. There may be additional programs that also do not meet accreditation requirements, as this limited sample arose from veteran complaints or lawsuits.

American Career College, Herzing University, and National American University offer numerous medical assistant programs that are approved for the GI Bill.

- 3 American Career College campuses in California are GI Bill approved but graduates are unlikely to be employed because they lack the programmatic accreditation required by the organization that offers the certification exam that employers require or prefer.
- Herzing. Herzing offers both certificates and Associates degrees in medical assisting. Seven Herzing medical assistant programs in Ohio, Wisconsin, and Nebraska are unaccredited.<sup>48</sup> Four programs in various states are accredited.<sup>49</sup>
  - Herzing’s medical assistant programs in Ohio, Wisconsin, and Nebraska are GI Bill approved but graduates are unlikely to be employed because they lack programmatic accreditation by the organization that offers the certification exam that employers require or prefer.
- National American University (NAU). Eight NAU medical assistant programs in Colorado, Missouri, Nebraska, Oklahoma, and Texas, are unaccredited. Sixteen other programs are accredited.
  - 8 National American University campuses are GI Bill approved in Colorado, Missouri, Nebraska, Oklahoma, and Texas, but graduates are unlikely to be employed because they lack programmatic accreditation by the organization that offers the certification exam that employers require or prefer.

#### **Minnesota Attorney General’s Lawsuit**

Herzing has offered an accredited medical assistant diploma program at its Crystal, Minnesota campus for many years. In 2011, Herzing began to offer a two-year associate degree in clinical medical assisting at its Crystal campus. To be eligible to sit for the Certified Medical Assistant (“CMA”) exam and obtain the certification preferred by many employers, a student must graduate from a medical assistant program that is programmatically accredited by either the Commission on Accreditation of Allied Health Education Programs (“CAAHEP”) or the Accrediting Bureau of Health Education Schools (“ABHES”). Herzing’s two-year degree program was not accredited by either organization.

<http://blogs.mprnews.org/oncampus/2013/11/mn-attorney-general-settles-with-herzing-u-over-lack-of-ma-accreditation/>

#### **Student Testimonials**

- *“I attended the [American Career College] Medical Assistants program, which promised a career in the medical field. Unfortunately, with all my hard work, this did not happen. I was*

<sup>47</sup><http://www.aama-ntl.org/docs/default-source/employers/more-emps-hire-cma.pdf?sfvrsn=4>

<sup>48</sup>Herzing’s website states that its Akron, Ohio, program is CAAEP accredited but CAAEP does not list the school’s program as accredited. See <https://www.herzing.edu/about/accreditation>

<sup>49</sup><https://www.herzing.edu/about/accreditation>



*Valedictorian of my class and received honor roll and perfect attendance on graduation. A month prior to graduation, the instructor informs me they had become unaccredited and Kaiser or any other hospital will not hire anyone from American Career College.” Student who wrote to the Senate HELP Committee quoted in *For Profit Higher Education: the Failure to Safeguard the Federal Investment and Ensure Student Success*, [http://www.help.senate.gov/imo/media/for\\_profit\\_report/PartII/ACC.pdf](http://www.help.senate.gov/imo/media/for_profit_report/PartII/ACC.pdf), pp. 235*

- A National American University recruiter touted the school’s Medical Assisting Program but the student found himself taking an accounting course. He complained and was then told that the campus did not yet have approval for the Medical Assisting Program and that the school had enrolled him in a healthcare management program. 2012 Senate HELP Committee Report, *For Profit Higher Education: the Failure to Safeguard the Federal Investment and Ensure Student Success*, [http://www.help.senate.gov/imo/media/for\\_profit\\_report/PartII/NAU.pdf](http://www.help.senate.gov/imo/media/for_profit_report/PartII/NAU.pdf), p. 624

## **Surgical Technology**

According to the U.S. Department of Labor, the majority of employers want surgical technologists who have passed a national certification exam. Certification exams are administered by the National Board of Surgical Technology and Surgical Assisting (NBSTA) and the National Center for Certification Testing (NCCT). To become NBSTA certified, you must have graduated from a school with programmatic accreditation from either ABHES or CAAHEP.<sup>50</sup> To become NCCT certified, you must have graduated from an “authorized” school.

The following programs do not meet accreditation requirements. There may be additional programs that also do not meet accreditation requirements, as this limited sampling arose from veteran complaints or lawsuits.

- 1 Brown Mackie campus in Kansas City, Kansas is GI Bill approved but graduates are unlikely to be hired because the Kansas City campus is neither ABHES nor CAAHEP approved. As a result, graduates of the Kansas City campus cannot become NBSTA certified. Brown Mackie’s Kansas City campus is not NCCT authorized.<sup>51</sup>
- 1 Sanford Brown campus in St. Peters, Missouri is GI Bill approved but graduates are unlikely to be hired because the Kansas City campus is neither ABHES nor CAAHEP approved. As a result, graduates of this campus cannot become NBSTA certified. It’s unclear whether Sanford Brown’s program is NCCT approved.”<sup>52</sup>

Veteran complaints suggest that a wide variety of other surgical technology programs may also not lead to the jobs that veterans have studied for.

### **Veteran Student Testimonial**

*“I was unable to get a job in the private sector because Everest’s Surgical Technical program was not*

<sup>50</sup><http://www.alliedhealthschools.com/health-careers/medical-technician/surgical-technologist-certification/>

<sup>51</sup>VES phone call with NCCT on May 26, 2015.

<sup>52</sup>Phone call with NCCT on May 28, 2015.

*accredited upon my graduation. Everest University stole the government's money and burdened me with tens of thousands of dollars of debt in return for a useless and meaningless degree."*  
Ehren N. of Florida (May 2015 complaint received by Veterans Education Success)

#### **New York Attorney General's Lawsuit**

*"Certain health services programs, including the Diagnostic Medical Ultrasound, the Cardiovascular Technology, and the Surgical Technology programs at Sanford Brown Institute.... were not programmatically accredited; that graduates of these unaccredited programs could not sit for certain qualifying exams typically necessary for employment upon graduation; and that graduates' inability to sit for these exams could negatively affect their employment opportunities."*

Attorney General of the State of New York v. Career Education Corporation, AOD No. 13-379, available at: <http://nylag.org/wp-content/uploads/2013/05/Executed-CEC-AOD.pdf>

## **ADDITIONAL DEGREE PROGRAMS THAT SHOULD BE INVESTIGATED**

Veteran complaints suggest that a wide variety of additional degree programs may also not lead to the jobs that veterans have studied for.

There may be additional programs that also do not meet accreditation requirements, as this limited sample arose from veteran complaints or lawsuits.

### **Medical Billing & Coding**

Medical Billing & Coding is a field similar to Medical Assistant—graduates of schools that lack the proper accreditation or recognition in the field may find it difficult to find a job.

#### **Veteran Student Testimonials**

- *"I was told [by Colorado Technical University] there were plenty of job opportunities in the Medical Billing and Coding field. But they won't hire you unless you have least two years experience. But how am I going to get the experience if they won't hire me? They also told us before we graduated get hired and then worry about getting certified. Well that's not right either. They are looking for you to be certified first."* Richard D. of Wisconsin (May 2015 complaint received by Veterans Education Success)
- *"I was assured [by Colorado Technical University] that everything was correct and I'd get my degree. They said they are accredited which is how the GI Bill is paying for it. During my LAST class for my associates degree, I found out that we can't get certified in a few different levels including the highest level which is actually required by most major medical facilities. It's a useless degree."* Cheryl M. of Illinois (April 2015 complaint received by Veterans Education Success)
- *"Sanford Brown lied, told me upon registration that my credits were transferable. This was incorrect. I was told I could get a job in that field. This was incorrect. Everything told to me was incorrect and now I owe money for a program that I took and aced however cannot get A job in medical billing and coding. They also said they were accredited. They are not."* Donna N. of South Carolina (May 2015 complaint received by Veterans Education Success)
- *[At Sanford Brown,] they didn't know how to teach. If we didn't understand we were told to 'learn it on our own.' One professor told us her way is the right way and to ignore the [Standard*



*Operating Procedure] on the test. We had to ask the President of the school for soap and paper towels in the lab because nothing was done when we asked professors for the supplies. We are handling bodily fluid without being able to wash our hands before or after handling them. We used donated expired reagents, test and tubes." Millie Q of Texas (May 2015 complaint received by Veterans Education Success)*

## **Engineering and Technology**

Engineering and Technology are additional fields in which industry standards require accreditation. In engineering, the recognized accrediting body (since 1932) is the Accreditation Board for Engineering and Technology, formerly known as the Engineers' Council for Professional Development. Lack of appropriate accreditation may make it difficult for graduates to obtain a job in their field of study.

### **Veteran Student Testimonials**

- *"When I was speaking with the [ITT] recruiter, he told me they were accredited. After 9 months, I found out yes they are accredited, just not ABET [Accreditation Board for Engineering and Technology, which is expected in the industry] accredited. Then I got deployed again. Now my student loans are almost \$7,000." Heith I. of Oregon (May 2015 complaint received by Veterans Education Success)*
- *"The quality of education [at Heald] was poor. I work in the telecom field and one would think that coming from a school that advertised hands on learning, that I would have known how to terminate telephone, data, and video jacks, right? Not the case. I had a 2-year degree with barely any hands on experience, never touched a relevant meter that professionals use in the field. I felt very let down and cheated that I invested so much time and energy, not getting the hands on experience, and career support as intended." Ryan B. of Hawaii (May 2015 complaint received by Veterans Education Success)*

## **CONCLUSION**

In conclusion, veteran complaints and state law enforcement lawsuits enabled us to identify a number of programs that lacked the proper accreditation needed to meet state licensing requirements or employer expectations. As a result, veterans graduating from these programs, which were GI Bill approved, would be unable to obtain a job in their field of study. Our research likely uncovered only the tip of the iceberg with respect to programs that lacked the proper accreditation.

There are likely additional programs that also do not meet accreditation requirements, as this limited sampling arose from veteran complaints or lawsuits.

## **METHODOLOGY**

Veterans Education Success identified degrees that do not lead to certification or licensure by reviewing state Attorney General lawsuits and student complaints. We then used several databases to determine the necessary certification or licensure requirements for various degree programs.

- *College Navigator*. This Department of Education website indicates whether a school participating in federal student aid is regionally or nationally accredited.
- *Specialized Accrediting Agencies*. We identified the specialized accrediting agencies approved by the Department of Education and then used those agencies' websites or the website of the Council on Higher Education Accreditation (CHEA) to identify the schools whose degrees have received programmatic accreditation ([www.chea.org](http://www.chea.org)).
- *State Certification and Licensure Requirements*. For certain degrees such as nursing and teaching, we reviewed state websites to determine if schools' degree programs were approved, enabling graduates to set for certification or licensure exams.
- *Employer Preferences*. We reviewed the website of organizations that provide certifications for graduates of programs such as dental assistant, medical assisting, and medical ultrasound sonography to determine industry hiring standards for individuals who graduate with certificates or degrees in such fields.
- *WEEMS Database*. This Department of Veterans Affairs (VA) database identifies the programs at each school campus that are approved to receive GI Bill funds (<http://inquiry.vba.va.gov/weamspub/buildSearchInstitutionCriteria.do>).