



Why For-Profit Institutions Are Targeting Veterans Educational Benefits

“We’ve got to make sure you’ve got every tool you need to make an informed decision when it comes to picking a school.... Right now, it’s not that easy.... You go online to try and find the best school for military members.... You end up on a website that looks official. They ask you for your email, they ask you for your phone number. They promise to link you up with a program that fits your goals. Almost immediately after you’ve typed in all that information, your phone starts ringing.... But, as some of your comrades have discovered, sometimes you’re dealing with folks who aren’t interested in helping you. They’re not interested in helping you find the best program. They are interested in getting the money. They don’t care about you; they care about the cash.

So they harass you into making a quick decision with all those calls and emails.... I’m not talking about all schools.... But there are some bad actors out there. They’ll say you don’t have to pay a dime for your degree but, once you register, they’ll suddenly make you sign up for a high interest student loan. They’ll say that if you transfer schools, you can transfer credits. But when you try to actually do that, you suddenly find out that you can’t. They’ll say they’ve got a job placement program when, in fact, they don’t. It’s not right. They’re trying to swindle and hoodwink you.”

– President Barack Obama, April 27, 2012, signing Executive Order 13607

What the President described is all too real. It is a problem that has been documented by: two undercover U.S. Government Accountability Office investigations; a two-year U.S. Senate Committee investigation; hearings by multiple Congressional Committees; CBS News; 60 Minutes; PBS Frontline; ABC News; the *New York Times*; *The Wall Street Journal*, and multiple other media outlets. More than 50 newspapers across the country have written editorials to express their concern about problem, including *USA Today* and six editorials by the *New York Times*, alone.

Why Veterans?

The G.I. Bill is America’s chief “thanks” to those who have given the most to their country; it is a ticket to the American Dream for most veterans – a chance to earn a college degree and the skills needed for the civilian workforce and a better future for themselves and their families.

But veterans coming home from Iraq and Afghanistan are being targeted by very aggressive and deceptive sales pitches for low-quality, high-cost, for-profit colleges that have a financial incentive – because of an unfortunate loophole in federal law – to deceive veterans in order to get access to their G.I. Bill dollars.

The 90/10 Loophole: Federal law forbids for-profit colleges from receiving more than 90 percent of their revenues from federal education aid, but the G.I. Bill was largely dormant at the time the law was enacted (prior to the establishment of the post-9/11 G.I. Bill), and neither the G.I. Bill, nor Defense Department tuition assistance, are specifically named in the list of federal education aid. This loophole allows for-profit colleges to count the G.I. Bill and military tuition assistance as private, non-federal dollars to help them avoid a 90% cap they otherwise face on federal aid. (Twenty-two state Attorneys General wrote Congress that this practice was a violation of the intent of the federal cap.ⁱ)

Because of this 90/10 loophole, for-profit colleges are eager to enroll students using the G.I. Bill and Defense Department tuition assistance – so eager that some companies engage in deceptive and aggressive marketing to sign up veterans and service members.

As Holly Petraeus, the head of Service Member Affairs at the Consumer Financial Protection Bureau, has explained: “For every service member or veteran (or spouse or child, in the case of the post-9/11 G.I. Bill) enrolled at a for-profit college and paying with military education funds, that college can enroll nine others who are using nothing but Title IV money. This gives for-profit colleges an incentive to see service members as nothing more than dollar signs in uniform, and to use aggressive marketing to draw them in.”ⁱⁱ

Internal corporate e-mails obtained by the U.S. Senate Committee on Health, Education, Labor, and Pensions (HELP) during its two-year investigation show executives at the largest for-profit colleges actively discussing their “military strategy” and need to “accelerate military billings/collections” to keep under the 90 percent cap on federal funds, and to launch special veterans programs because “we’re all in agreement that we should do this for 90/10.”ⁱⁱⁱ

How Aggressive is the Recruiting?

A veteran and staffer at VFW tested the system. He told National Public Radio, “Within three to four days, I got in excess of 70 phone calls and I got well over 300 emails” from for-profit colleges.^{iv}

For-profit college salesmen continue to recruit on military bases and VA hospitals. As *Business Week* reported, Ashford University even signed up a Marine with traumatic brain injury convalescing in a military hospital. “U.S. Marine Corporal James Long knows he’s enrolled at Ashford University. He just can’t remember what course he’s taking.”^v

The U.S. Government Accountability Office ran two undercover investigations, sending undercover agents to pose as students. Every single one of 15 large for-profit colleges deceived federal undercover officers about the quality of education, cost, and likely job and salary for graduates.^{vi} Four colleges engaged in actual illegal fraud (such as directing students to falsify federal student loan applications). The undercover officers then registered as students at those colleges, and found the “education” of such low quality that students were encouraged to cheat and received top grades for submitting photos of celebrities in lieu of a required essay.^{vii}

How Deceptive is the Recruiting and Marketing?

In a two-year investigation, the U.S. Senate HELP Committee found rampant deception by for-profit colleges about every aspect of the education they offer – the true tuition, the quality, the teachers, the classrooms, the lessons, the accreditation, the eligibility for licensing or jobs, the ability to transfer credits to nearby public colleges, the graduation rate, the job placement rate, career assistance, and even signing students up for high-interest private loans without their knowledge or failing to disclose the true terms of loans.^{viii}

Some for-profit colleges even promise veterans a career in fields that require a license – such as law, plumbing, electricity, and medical fields – but veterans find out after graduation their college is not recognized or properly accredited and graduates are not eligible to obtain licenses required for the career. For example:

- Argosy University in December 2013 had to pay more than \$3 million to settle a suit by the Colorado Attorney General for deceiving students about their eligibility to work as licensed psychologists after completing Argosy’s unaccredited graduate program.^{ix}
- Kaplan operates a law school not recognized by the American Bar Association, and its graduates cannot take the bar exam (outside of California, which doesn’t require any law degree). The U.S. Senate heard testimony from a Kaplan law student who was promised a bright career as a lawyer in Iowa, and took out student loans of over \$100,000 to pay for his “law school” education, but was never told he would not be eligible to take the bar exam upon graduation. He testified: “The Dean [of Kaplan] apparently didn’t know or forgot to mention this little problem.”^x
- Sanford Brown runs several health programs whose graduates are ineligible for licensing. The U.S. Senate HELP Committee heard testimony from a graduate of Sanford Brown’s sonography program who was promised a career as a sonographer in an obstetrician’s office, but who said Sanford Brown lied to her about its accreditation and her eligibility to obtain a license as a sonographer.^{xi} The New York Attorney General recouped more than \$10

million in 2013 from Sanford Brown's parent company because of deceptions by Sanford Brown and a sister school.^{xii}

- Local TV news in Charlotte, N.C., reported that students at a Kaplan dental assistance program said Kaplan lied to them about Kaplan's accreditation and its graduates' eligibility to obtain licenses as dental assistants.^{xiii}

At the same time, some schools market that their degree is needed for a job, when it is not. The Senate HELP Committee received many complaints from individuals who were told by a for-profit school that they needed its degree, only to find upon graduation that the job they were trained for could be had with a simple high school degree or GED. Similarly, the Center for American Progress released a report detailing how for-profit colleges sell their degrees as necessary for health jobs, when those degrees are not needed (such as for medical billing) or provide insufficient training to obtain the job.^{xiv}

Federal and state law enforcement – prodded and assisted by Veterans Education Success – are starting to take action. The U.S. Federal Trade Commission recently opened an investigation into deceptive marketing and recruiting by DeVry; the U.S. Consumer Financial Protection Bureau has launched a lawsuit against ITT Technical Institute and Corinthian Colleges; the U.S. Department of Justice has one open suit against EDMC and is investigating additional suits against other companies; the U.S. Department of Education is shuttering Corinthian Colleges for fabricating job placements; the U.S. Securities & Exchange Commission is investigating several for-profit school chains; and nearly three dozen state Attorneys General are investigating and bringing suits against half a dozen of the for-profit companies that conduct deceptive recruiting.

None of these federal or state law enforcement actions would be occurring today without the advocacy, and support in gathering witnesses and building legal cases, by Veterans Education Success and its close allies.

How Recruiters Deceive Veterans

Education salesmen turned whistleblowers have explained what's going on inside the massive call centers where for-profit college salesmen are under constant pressure to sign up veterans:

- “We’re selling you that you’re gonna have a 95 percent chance that you are gonna have a job paying \$35,000 to \$40,000 a year by the time they are done in 18 months,” Brooks College (Career Education Company) salesman Eric Shannon told CBS’ 60 Minutes. “We later found out it’s not true at all.”^{xv}
- “Get asses in classes” through “the military gravy train,” even if service members are not ready or are being deployed to heavy fighting zones, DeVry University instructed its salesmen, according to Christopher Neiweem, a

veteran of Operation Iraqi Freedom and DeVry salesman, who was assigned specifically to target military students.^{xvi} Neiweem told Congress he was instructed to pose as a “military advisor” affiliated with the Pentagon. Following his testimony, four additional DeVry military salesmen wrote Congress to say they were told to do the same. (Veterans Education Success identified Neiweem and arranged for his testimony before Congress.)

- "You'd probe to find a weakness," said Brian Klein, a former admissions employee at Argosy University Online, one of four major colleges operated by EDMC, whose recruiters filed a whistleblower lawsuit against EDMC, which the U.S. Department of Justice has joined on behalf of deceived students and taxpayers. "You basically take all that failure and all those bad decisions, and you spin it around and put it right back in their face as guilt, to go to this shitty university and run up all of this debt."^{xvii}
- “Everything here is about the numbers. You make your numbers, or you are out of a job,” recruiters at Colorado Technical University – housed in an office building with no classrooms and no professors, but row upon row of salesmen – told the New York Times.^{xviii} Salesmen from Ashford and Westwood reported the same.
- "It just got to the point where I felt like I was lying to these people on a regular basis," said Patrick Flynn, a recruiter at EDMC's South University online from 2006 through 2009, when he quit. "Honestly, I just felt dirty doing the things I was doing. It's almost like they were trying to make me take advantage of people's belief in what this education was going to get them, when I didn't buy into it myself."^{xix}

Listeners can hear for themselves how aggressive and deceptive the recruiting phone calls are. **PBS Frontline** reporters recorded the calls, as part of research for a documentary^{xx} about veterans tricked by Art Institutes and other predatory for-profit colleges.^{xxi}

Internal recruiting documents of predatory for-profit colleges – made public during the two-year investigation by the U.S. Senate HELP Committee – reveal that many for-profit colleges engage in **pain-based recruiting**.^{xxii} Salesmen are specifically taught to emotionally manipulate vets into signing up, because, as their internal corporate documents acknowledge, students are unlikely to make a “rational” decision to attend for-profit colleges, given that community colleges and public universities offer lower cost, higher quality, accredited degrees.

What Veterans Say

Here is what it is like from the point of view of a veteran:

- Marine Specialist Bryan Babcock: *“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 Corporal Anselm Caddell: “When I attempted to transfer my units 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.”*
- *Air National Guard Corporal Chad Putnam: “I was told that the Art Institute had a 93% job placement rating and since the school had campuses all over the U.S., that I would have access to a nationwide network of employers... It wasn’t until near the end of my schooling that I began to realize that a lot of the training I was getting was outdated, in some instances by a few years, and that I had a long way to go until I was up to par with the industry standards. I also found out that... my program had a success rate of only 38%. I have student loans that I am going to be paying off for years and really I have nothing to show for it.”*
- *Marine Corporal Thomas Dickson: “I entered my information in a search engine for military friendly schools. I received a phone call from Colorado Technical University. After speaking with the admissions rep, I told him I wanted to explore all my options. That same admissions representative called me everyday until I submitted my application to the school. After my application was accepted, I received an email instructing me how to apply for a loan with the exact amount I needed to request. I was told that this loan was the only way I could attend classes. [Months later, when] I learned I was going to be deployed and would have no phone and no internet access, I contacted my advisor and was told I could put my classes on hold and finish them when I returned. I was instructed to email my professors to alert them of my situation and my advisor would take care of the rest. When I returned from the field-op, I learned that I failed my classes and was signed up for another session, which I was currently failing. Obviously, my classes were not put on hold nor was I withdrawn for a military leave of absence. I called my advisor, [who] informed me that I could not withdraw from classes because it was school policy to not allow withdrawals during the first year of attendance.”*
- *A military student who wrote to the U.S. Senate HELP Committee: “I believe that the University of Phoenix is using deceptive practices in order to lure students into the school[. T]he enrollment counselors tell students that they*

should be complete with their course of studies in a short period of time fully knowing how long it is going to take. . . . I have talked with other students at the University of Phoenix and this appears to be a common tactic used by University of Phoenix enrollment counselors.”^{xxiii}

- Another military student shared with the Senate HELP Committee the letter he wrote to the University of Phoenix, which is billing him for classes he never took: *“As a marine of 19 years, I’ve served in Desert Storm, Somalia, and Operation Iraqi Freedom x2. You cannot imagine the emotional battle this has taken on me after dealing with this for nearly TWO years!! An education institution such as yours earns millions of dollars each year, and yet you punish those who are willing to risk their lives and fight for your freedoms, you should be ashamed.”^{xxiv}*
- Marine Jonathan Ngowaki, was signed up by DeVry for a \$15,000 loan without his knowledge and against his explicit instruction that he wanted no loans. He believes the school misrepresented the forms he signed when enrolling: *“I went into the military so I wouldn’t have college debt, but now I have this debt and I have a family and it’s taken that money away from my family. It’s all about the money. It’s all a money game. It really bothers me.”*

“All they hear from these schools is, ‘This won’t cost you a thing,’” explained Robert L. Songer, a retired Marine colonel who is the lead education adviser at Camp Lejeune in North Carolina.^{xxv} Songer said for-profit colleges hound Marines at Camp Lejeune to enroll in classes of limited educational value and even sign them up for high-interest-rate loans. He cited numerous complaints he received from Marines.

What Federal Policymakers Say:

Federal policymakers are well aware of the problem:

- Holly Petraeus, the head of servicemember affairs at the federal Consumer Financial Protection Bureau explained in her New York Times op-ed, this loophole “gives for-profit colleges an incentive to see service members as nothing more than dollar signs in uniform, and to use aggressive marketing to draw them in.”^{xxvi}
- “I think it is a sin,” Republican Congressman Walter B. Jones of North Carolina, a member of the Armed Services Committee, told the New York Times. “Here we are telling these young men and women they can get a higher education, and they get cheated.”^{xxvii}
- “For-profit schools see our active-duty military and veterans as a cash cow, an untapped profit resource,” said former Senate HELP Chairman Tom Harkin, who led a Senate investigation^{xxviii} into this scam. “It is both a rip off of the taxpayer and a slap in the face to the people who have risked their

lives for our country.”^{xxix}

- President Obama explained at Fort Stewart in Georgia, as he signed Executive Order 13607^{xxx} to combat the scam: “There are some bad actors out there. They’ll say you don’t have to pay a dime for your degree, but once you register they’ll suddenly make you sign up for a high-interest student loan. They’ll say that if you transfer schools, you can transfer credits, but when you try to actually do that, you suddenly find out that you can’t. They’ll say they’ve got a job placement program, when, in fact, they don’t. They’re trying to swindle and hoodwink you. They don’t care about you; they care about the cash. It’s not right.”^{xxxi}

Examples of Recent Law Enforcement Action

Legal action can make an enormous difference in recouping losses for existing students and providing a deterrent effect on the industry from its most egregious deceptive recruiting practices. Recently:

- The New York Attorney General this summer recouped more than \$10 million for New York students who were deceived by colleges owned by Career Education Corporation (Sanford Brown, Briarcliffe, American Intercontinental U. Colorado Technical U, and Cordon Bleu) for deceiving prospective students about their job prospects. The settlement importantly requires CEC to henceforth verify its job placement claims.^{xxxii}
- The Colorado Attorney General recouped \$4.5 million from Westwood College for students who were signed up for loans without their knowledge at 18% interest rates.^{xxxiii} (Students also were deceived with inflated job placement numbers and job prospects.^{xxxiv})
- The Colorado Attorney General recouped \$3.3 million for students who were deceived by Argosy University (owned by EDMC – also currently the subject of a DOJ lawsuit) regarding their eligibility to become licensed psychologists.
- The Kentucky Attorney General forced the corporate owner of one of the most deceptive websites to shut down the website, www.GIBill.com, and deliver the domain to the Department of Veterans Affairs. (The website was designed to appear to be the official government’s portal to GI Bill benefits, but listed only for-profit colleges on a list of “G.I. Bill Schools,” leading students to believe those were the only schools that accepted G.I. Bill benefits).^{xxxv}
- Approximately 30 state Attorneys General are investigating potential cases against for-profit colleges. Some examples of ongoing cases include New Mexico AG suing ITT Tech for deceiving students about their ability to become registered nurses from its unaccredited nursing degree.

Findings of the U.S. Senate HELP Committee

At the conclusion of its two-year investigation, the U.S. Senate HELP Committee released a 2,000-page report. Some of the findings:^{xxxvi}

- More than half the students who were signed up by for-profit colleges in 2008-09 left without a degree or diploma within a median of 4 months. Among 2-year Associate degree seekers, 63 percent left without a degree. No wonder, because when we visited one for-profit college, we met the “mentor” who turned out to be an Avatar named Sophie. When we asked Sophie, “What’s a topic sentence?,” Sophie the Avatar answered about syntax. When students face low-quality education, they walk away.
- For-profit colleges account for half of the nation’s student loan default problem but serve only 13 percent of the nation’s students.
- For-profit colleges charge an average of 20 percent more for Bachelor’s degree programs than the cost of analogous programs at flagship public universities, and 4 times more for Associates degree programs than at comparable community colleges. Certificate programs average 4½ times more than at community colleges.
- Corporate documents show that the recruiting process is about sales. All employees in the admissions chain, from CEO to junior recruiters, are rated at least in part on the number of “starts” or students they sign up. Recruiters are trained to “overcome objections” and dig for and push on the pain in prospective students’ lives to get them to sign up.
- For-profits spend the vast majority of their revenue on marketing, recruiting, profit, and lobbyists – leaving little for education. While public universities and non-profit colleges sink the vast majority of their funds into educating students, for-profit colleges set aside very little to education – only 17 percent on average. ^{xxxvii} The rest goes to profit (20 percent, on average), to TV ads and call centers to recruit more students (also more than 20 percent, on average) and to CEO salaries of, on average, \$8 to 9 million per year, but with some making up to \$20 and \$40 million dollars^{xxxviii} (compared to the non-profit college President’s average of less than \$400,000).

In 2014, the Senate HELP Committee released a report showing that veterans using their Post-9/11 GI Bill educational benefits are increasingly attending for-profit institutions.^{xxxix} The new analysis shows:

- Four years after the Post-9/11 GI Bill was implemented, enrollment of veterans in for-profit colleges has again increased sharply, in tandem with a

steep decline in the share of veterans' enrolling in public institutions, even though overall student enrollment in for-profit colleges has declined.

- For-profit colleges received \$1.7 billion in Post-9/11 GI Bill benefits during the 2012-13 academic year – almost as much as the total cost of the program just four years earlier.
- Eight of the top 10 recipients of Post-9/11 GI Bill benefits are large, publicly-traded companies that operate for-profit colleges. These eight companies have received \$2.9 billion in taxpayer dollars to enroll veterans in their for-profit colleges over the past four years, including 23 percent of all Post-9/11 GI Bill benefits (\$975 million) in 2012-13.
- Amongst the top recipients of Post-9/11 GI Bill benefits is Corinthian Colleges, Inc. Corinthian received \$186 million in Post-9/11 GI Bill funds from 2009 to 2013, yet recently announced it was in such severe financial distress that it would close or sell all campuses. In all, seven of the eight companies are currently under investigation by state attorneys general or federal agencies for deceptive and misleading recruiting or other possible violations of federal law.
- While the total number of veterans attending all colleges on the Post-9/11 GI Bill grew rapidly between 2009-10 and 2012-13, both the number of veterans attending for-profit colleges and the amount of benefits these colleges received increased more than in other sectors of higher education.
- The percentage of veterans attending a public college has declined precipitously, from 62 percent in 2009 to just 50 percent in 2013. During the same period, the percentage of veterans enrolling in for-profit colleges increased from 23 to 31 percent of total enrollees.
- Although overall student enrollment has decreased at each of the eight top for-profit GI Bill beneficiaries, their enrollment of veterans has dramatically increased during the same period.
- Taxpayers continue to pay twice as much on average to send a veteran to a for-profit college for a year compared to the cost at a public college or university (\$7,972 versus \$3,914).
- The federal government does not currently track how veterans are performing at different types of colleges. However, overall student outcomes provided by the companies to the HELP Committee for students enrolling between 2008 and 2009 give ample reason for concern. At the for-profit colleges currently receiving the most benefits, up to 66 percent of students withdrew without a degree or diploma.

- Between 39 and 57 percent of the programs offered by four of the companies receiving the most Post-9/11 GI Bill benefits would fail to meet the proposed gainful employment rule, suggesting that the students who attend these institutions do not earn enough to pay back the debt they take on.
- Some large companies that operate for-profit colleges appear to be increasingly dependent on Post-9/11 GI Bill funds to comply with the federal requirement that no more than 90 percent of revenues come from federal student aid. These companies are taking advantage of the 90/10 loophole that allows them to count military and veteran educational benefits as non-federal revenue.

For More Information:

Our website has a wealth of information: www.veteranseducationsuccess.org

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ⁱ See Letter from Jack Conway, Kentucky Attorney General, and 21 other attorneys general to Senate and House leaders, May 29, 2012, *available at*: <http://migration.kentucky.gov/NR/rdonlyres/88B3C155-E62F-4355-8D83-FFA9C01DE0DD/0/9010letter.pdf>.

ⁱⁱ See Hollister K. Petreaus, "For-Profit Colleges, Vulnerable G.I.'s," *New York Times*, , *available at* <http://www.nytimes.com/2011/09/22/opinion/for-profit-colleges-vulnerable-gis.html>.

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- iii See U.S. Senate Committee on Health, Education, Labor & Pensions Report, "For Profit Higher Education: The Failure to Safeguard the Federal Investment and Ensure Student Success," July 30, 2012, *available at* http://www.help.senate.gov/imo/media/for_profit_report/Contents.pdf.
- iv See "For Profit Schools Under Fire for Targeting Veterans," National Public Radio, April 9, 2012, *available at* <http://www.npr.org/2012/04/09/150148966/for-profit-schools-under-fire-for-targeting-veterans>.
- v See Daniel Golden, "For Profit Colleges Target the Military," *Business Week*, December 30, 2009, *available at* http://www.businessweek.com/magazine/content/10_02/b4162036095366.htm
- vi See U.S. General Accounting Office, "For-Profit Colleges: Undercover Testing Finds Colleges Encouraged Fraud and Engaged in Deceptive and Questionable Marketing Practices," GAO-10-948T, August 4, 2010, *available at*: <http://www.gao.gov/products/GAO-10-948T>. Note that although for-profit college lobbyists objected to the tone of the GAO's conclusions, they did not dispute the undercover recordings of deceptive recruiting, because those are indisputable.
- vii See U.S. General Accounting Office, "For-Profit Schools: Experiences of Undercover Students Enrolled in Online Classes at Selected Colleges," GAO-12-150, October 31, 2011, *available at*: <http://www.gao.gov/products/GAO-12-150>.
- viii *Available at*: http://www.help.senate.gov/imo/media/for_profit_report/ExecutiveSummary.pdf
- ix See "Attorney General Suthers Announces Consumer Protection Settlement with Argosy University," December 5, 2013, *available at* https://www.coloradoattorneygeneral.gov/press/news/2013/12/05/attorney_general_suthers_announces_consumer_protection_settlement_argosy_unive
- x See Testimony of Eric Schmitt, U.S. Senate Committee on Health, Education, Labor & Pensions, "Drowning in Debt: Financial Outcomes of Students at For-Profit Colleges," June 7, 2011, *available at*: <http://www.help.senate.gov/imo/media/doc/Schmitt.pdf>
- xi See Testimony of Yasmine Issa, U.S. Senate Committee on Health, Education, Labor and Pensions, "Emerging Risk? An Overview of the Federal Investment in For-Profit Education," June 24, 2010, *available at*: <http://www.help.senate.gov/imo/media/doc/Issa.pdf>
- xii New York Attorney General Press Release, "A.G. Schneiderman Announces Groundbreaking \$10.25 Million Dollar Settlement With For-Profit Education Company That Inflated Job Placement Rates To Attract Students: Agreement Goes Above And Beyond Federal And State Requirements For For-Profit Education Industry," August 19, 2013, *available at* <http://www.ag.ny.gov/press-release/ag-schneiderman-announces-groundbreaking-1025-million-dollar-settlement-profit>
- xiii See <http://www.wsocvtv.com/news/news/whistleblower-9-students-say-they-were-misled-by-l/nGSy3/>
- xiv See Center for American Progress, "Profiting From Health Care: The Role of For-Profit Schools in Training the Health Care Workforce," *available at*

<http://www.americanprogress.org/issues/healthcare/report/2011/01/20/8945/p-rofiting-from-health-care/>.

^{xv} See “For Profit College: Costly Lesson: Steve Kroft Reports Whether or Not Career Colleges Pay Off,” CBS 60 Minutes, August 11, 2005, *available at*

<http://www.cbsnews.com/news/for-profit-college-costly-lesson-11-08-2005/>.

^{xvi} See Testimony of Christopher Neiweem, U.S. Senate Committee on Appropriations, “Hearing on Voluntary Military Education Programs,” June 12, 2013, *available at*: <http://www.appropriations.senate.gov/ht-defense.cfm?method=hearings.view&id=3f3ad71e-2ee7-4e14-b4f9-8b67aea4c947>.

^{xvii} See Chris Kirkham, “With Goldman’s Foray into Higher Education, A Predatory Pursuit of Students and Revenues,” *Huffington Post Business*, October 14, 2011, *available at*: http://www.huffingtonpost.com/2011/10/14/goldman-sachs-for-profit-college_n_997409.html.

^{xviii} See Eric Lipton, “Profits and Scrutiny for Colleges Courting Veterans,” *New York Times*, December 8, 2010, *available at*

<http://www.nytimes.com/2010/12/09/education/09colleges.html>

^{xix} See Chris Kirkham, “With Goldman’s Foray into Higher Education, A Predatory Pursuit of Students and Revenues,” *Huffington Post Business*, October 14, 2011, *available at*: http://www.huffingtonpost.com/2011/10/14/goldman-sachs-for-profit-college_n_997409.html.

^{xx} See PBS Frontline, “Educating Sergeant Pantzke,” *available at*

<http://www.pbs.org/wgbh/pages/frontline/educating-sergeant-pantzke/>

^{xxi} Recorded calls are available at

<http://www.pbs.org/wgbh/pages/frontline/educating-sergeant-pantzke/recruiters-sales-pitch/>

^{xxii} Internal corporate documents are available here:

http://www.huffingtonpost.com/2011/02/08/for-profit-college-recruiters-documents_n_820337.html, and here:

http://www.help.senate.gov/imo/media/for_profit_report/Contents.pdf.

^{xxiii} Student complaint to the U.S. Senate, U.S. Senate Committee on Health, Education, Labor & Pensions Report, “For Profit Higher Education: The Failure to Safeguard the Federal Investment and Ensure Student Success,” July 30, 2012 (chapter on Apollo), *available at*

http://www.help.senate.gov/imo/media/for_profit_report/PartII/Apollo.pdf

^{xxiv} Student complaint to the U.S. Senate, U.S. Senate Committee on Health, Education, Labor & Pensions Report, “For Profit Higher Education: The Failure to Safeguard the Federal Investment and Ensure Student Success,” July 30, 2012 (chapter on Apollo), *available at*

http://www.help.senate.gov/imo/media/for_profit_report/PartII/Apollo.pdf

^{xxv} See Eric Lipton, “Profits and Scrutiny for Colleges Courting Veterans,” *New York Times*, December 8, 2010, *available at*

<http://www.nytimes.com/2010/12/09/education/09colleges.html>

^{xxvi} See Hollister Petraeus, “For Profit Colleges, Vulnerable G.I.’s,” *New York Times*, September 21, 2011, *available at*

<http://www.nytimes.com/2011/09/22/opinion/for-profit-colleges-vulnerable-gis.html>.

^{xxvii} See Eric Lipton, "Profits and Scrutiny for Colleges Courting Veterans," *New York Times*, December 8, 2010, available at

<http://www.nytimes.com/2010/12/09/education/09colleges.html>.

^{xxviii} See U.S. Senate Committee on Health, Education, Labor & Pensions Report, "For Profit Higher Education: The Failure to Safeguard the Federal Investment and Ensure Student Success," July 30, 2012, available at

http://www.help.senate.gov/imo/media/for_profit_report/Contents.pdf.

^{xxix} See Eric Lipton, "Profits and Scrutiny for Colleges Courting Veterans," *New York Times*, December 8, 2010, available at

<http://www.nytimes.com/2010/12/09/education/09colleges.html>

^{xxx} See Executive Order 13607 of April 27, 2012, Establishing Principles of Excellence for Educational Institutions Serving Service Members, Veterans, Spouses, and Other Family Members, available at

<http://www.veteranseducationsuccess.org/resources/Executive-Order-13607.pdf>.

^{xxxi} See Remarks by the President and First Lady at Fort Stewart, Georgia, April 27, 2012, available at <http://www.whitehouse.gov/the-press-office/2012/04/27/remarks-president-and-first-lady-fort-stewart-georgia>.

^{xxxii} See New York Attorney General Press Release, "A.G. Schneiderman Announces Groundbreaking \$10.25 Million Dollar Settlement With For-Profit Education Company That Inflated Job Placement Rates To Attract Students: Agreement Goes Above And Beyond Federal And State Requirements For For-Profit Education Industry," August 19, 2013, available at <http://www.ag.ny.gov/press-release/ag-schneiderman-announces-groundbreaking-1025-million-dollar-settlement-profit>

^{xxxiii} See Colorado Attorney General Press Release, "Attorney General Announces \$4.5 Million Settlement with Westwood College to Address Deceptive Business Practices," March 14, 2012, available at:

http://www.coloradoattorneygeneral.gov/press/news/2012/03/14/attorney_general_announces_45_million_settlement_westwood_college_address_dece

^{xxxiv} See Colorado Attorney General Press Release, "Attorney General Announces \$4.5 Million Settlement with Westwood College to Address Deceptive Business Practices," March 14, 2012, available at:

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^{xxxv} See Attorney General Conway Helps Shut Down Deceptive Website Preying on Veterans, June 2012, available at:

<http://ag.ky.gov/multimedia/kygennews/kygeneralnews0612.pdf>.

^{xxxvi} Available at:

http://www.help.senate.gov/imo/media/for_profit_report/ExecutiveSummary.pdf

^{xxxvii} *Id.*

^{xxxviii} *Id.*

^{xxxix} See "Is the New GI Bill Working?: For Profit Colleges Increasing Veteran Enrollment and Federal Funds," Senate HELP Committee, July 30, 2014. Available at:

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