Association of Career Education Colleges and Universities: Outcomes at Selected Member Schools

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In August 2018, Career Education Colleges and Universities (CECU), an association that represents for-profit schools offering career-education training, sent a letter to veteran and military service organizations (VSO/MSO) signed by 225 employees of member institutions. The letter urged VSO and MSO staff to visit one-or-more member campus "to see why student veterans and military-affiliated students choose our colleges over others." The letter urged recipients to: "Meet with our student veterans. Ask them why they enrolled. Ask them about their program of study. Ask them anything, but please visit and speak with us and our students in person."

All of the employees who signed the letter were veterans who are now employed by the schools as executives, teachers, or administrators. The 225 signatories represented 26 schools, all but 5 of which operate multiple campuses.[1] Twenty-five of the 26 schools are for-profit institutions and the 1 nonprofit schools had converted from for-profit status in 2011.

This Report

After a brief history of CECU, this report provides "key takeaways" from our analysis of both descriptive and outcome data for the 26 CECU-member schools. The report concludes with a discussion of some of the challenges in using outcomes data, much of which schools self-report, to compare schools. The underlying data can be found in this hyperlinked excel spreadsheet. It is important to keep in mind that graduation rate data are only for full-time, first-time students, providing a less comprehensive picture of who actually earned a degree. Data was not available for certain outcome measures at some schools. Because only limited outcome data is available for veterans, the outcome measures are for the general student population at each institution. Appendix 1 identifies the data sources and defines each of the data elements used.

Summary

What do the data reveal about these 26 CECU member schools?[2]

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[1]One of the signatories was the Regional Director of Admissions for Education Corporation of America (ECA), which owns five different schools, three of which also signed on to the CECU letter—Brightwood College, Brightwood Career Institute, and Golf Academy of America. The other two schools are New England College of Business and Ecotech Institute. On December 5, 2018, ECA announced that it was closing 70 of its campuses; only the New England College of Business will remain open. Another signatory, Broadview Educational Consortium, operates Utah-based Broadview University and recently took over several Globe University campuses in Wisconsin. Broadview participated in the "teach-out" for Globe University students when it closed in 2017. Globe University, which also had campuses in Minnesota, was found to have committed fraud in marketing and recruiting. As a result, it lost both its authorization to operate in Minnesota as well as access to Title IV funding in 2016.

[2]Outcome data for graduation and retention rates are campus specific. Other data such as earnings, default rates, or borrowing may be aggregated for all campuses under the same ownership if they use the same Department of Education identification number.

- First, the career training programs offered by these institutions are more expensive than similar programs at a community college. For example, tuition and fees averaged about $19,000 a year at the 24, 2-year or less CECU schools compared to average in-state tuition of $3,810 at a community college for the 2017-18 academic year.[3]

- Second, some schools are clearly not a good option for military connected students. For example, American National University's outcomes are among the worst of the 26 schools evaluated, having the:

  - second lowest graduation rate (30 percent);
  - second highest median student loan debt ($27,398);
  - lowest proportion of students paying down their student loan debt (14 percent);
  - largest number of programs that failed to provide gainful employment (8); and
  - second lowest median salary 10 years after leaving school.

  In addition, American National University had one of the largest increases in the proportion of students who defaulted between the 3rd and 5th year after entering repayment (20 percentage points), suggesting that measuring defaults after 3 years understates the scope of the problem.

- Third, a few schools, Unitek College and St. Paul's School of Nursing, have high graduation rates and higher median salaries. Moreover, their student loan repayment rates are higher than the national average and their default rates are among the lowest of the 26 CECU schools. They are more expensive, however, than public sector alternatives.

- Finally, outcomes are mixed for many schools. Thus, several trade-oriented, CECU schools reported higher median salaries than other similar schools that VES evaluated but showed a large increase in borrowers who defaulted on their student loans between the 3rd and 5th year after entering repayment (All-State Career School and Brightwood Career Institute).

What is CECU?

CECU represents 90 schools that offer certificates and degrees at approximately 500 campuses. According to the association's website:

> "CECU member institutions cover the full gamut of postsecondary education: from short-term certificate and diploma programs, to two- and four-year associate and baccalaureate degrees, to master's and doctoral programs. Some of the occupational fields for which CECU institutions provide programs include: information technology; allied health; business administration; commercial art; radio and television broadcasting; and culinary and hospitality management."

[3]Community college costs are the unweighted average price and don't take into consideration enrollment at institutions with larger numbers of full-time students.

CECU looks quite different today than it did just 2 years ago. Until 2016, CECU was known as APSCU—the Association of Private Sector Colleges and Universities. According to a 2016 article on the association, "The group's internal dynamics and external advocacy have long favored large publicly-traded and private-equity-owned companies over smaller operations." By rebranding, the association returned to its earlier roots when it was known as the Career College Association. Commenting on the name change, Steve Gunderson, the President of CECU, stated that the association seeks to represent any school that offers career education programs, regardless of institutional sector. However, only 2 of the 90-member schools are nonprofit—Keiser University and Center for Excellence in Higher Education; both of the companies that own these schools converted from for-profit to nonprofit status in 2011 and 2018, respectively. As a result, the 90/10 rule no longer applies because only for-profit schools are subject to the 90 percent cap on revenue from federal student aid.[4]

In part, the refocus on career education was tied to the damaged reputation of large, publicly traded member institutions, which had left the association prior to its July 2016 name change, including Corinthian, DeVry, Kaplan, EDMC, and ITT Tech.[5] All of these schools were either under investigation by federal and state authorities or had settled lawsuits. Corinthian declared bankruptcy in 2015 after being fined $30 million by the Department of Education for falsifying job placement rates. ITT declared bankruptcy in September 2016, shortly after the Department cut off Title IV funds based on a report by the school's accreditor that it was not in compliance with accreditation standards and was unlikey to return to compliance. At the time it closed, ITT was being investigated by multiple state and federal authorities. EDMC and Kaplan sold their schools to nonprofits in 2017 and 2018, respectively, and DeVry is similarly attempting to sell some of its campuses.[6] Although these large schools offered career education programs, they also competed with public and nonprofit institutions, which primarily focus on 2-year and 4-year degrees rather than certificates.

[4]For-profit schools have a financial incentive to recruit GI Bill students because of their guaranteed educational benefits and because those benefits are excluded from the 90 percent cap on proprietary school revenue from federal student aid. The Defense Department's Tuition Assistance benefits for active-duty servicemembers are also excluded. Even though these benefits are federal revenue, they are counted as part of the 10 percent of revenue from "private" payers—individuals and employers who reach into their own wallets to pay tuition. A school's ability to attract private payers was adopted as a proxy for quality but has never been tested because of this 90/10 loophole.

[5]Career Education Corporation and Bridgepoint also subsequently quit the association.

[6]In September 2018, Education Corporation of America (ECA), which purchased 38 Kaplan College campuses, announced it was closing seven of those locations, which it had rebranded as Brightwood College. In total, ECA plans to close a total of 26 campuses that it operates under different brand names. It attributed the closures to declining enrollment.

Key Takeaways

What follows are key takeaways from our analysis of both the descriptive and outcome data on the spreadsheet. The spreadsheet also includes information such as national medians for outcome measures to help contextualize the data on these 26 schools.[7] The letters in parentheses identify the relevant data columns on the spreadsheet.

Descriptive Data

- *Predominate Degree Program (F).* Twelve of the 26 schools offer predominately certificates. Of the remaining schools, only two offered 4-year degrees. In general, students are more likely to complete certificates than to graduate from associate's or bachelor's degree programs.

- *Most popular degrees (G).* The most popular degree at 14 of the 26 schools was "health professions." At the remaining schools, computer sciences, engineering, and equipment maintenance and repair were the most popular degrees. A 2011 report questioned the value of some of the "health profession" certificates in which for-profit schools appear to specialize, such as medical assisting. As the spreadsheet shows, programs such as medical and dental assistant frequently failed or were at risk of failing to provide former students with gainful employment that allowed them to pay down their loan debt.

- *Number of GI Bill eligible campuses (H).* All but 5 of the 26 schools operated multiple campuses. Fifteen schools had from 2-6 locations and the remaining 6 had between 16 and 51 campuses.

- *GI Bill enrollment (I).* Fifteen of the 26 schools enrolled fewer than 500 GI Bill students. ECPI University had the highest GI Bill enrollment (2,091). Many of the schools, however, operated other campuses that also enrolled GI Bill students. Overall GI Bill enrollment at all of the campuses operated by the 26 CECU member schools was 16,564 in 2017, ranging from a low of 16 (Delta College of Arts and Technology) to a high of 4,468 (ECPI). In contrast, the University of Phoenix, which is not a CECU member, enrolled 17,631 GI Bill students in 2017.

- *Caution Flags (J).* About half of the 26 schools have caution flags on the GI Bill Comparison Tool indicating that they are under increased regulatory or legal scrutiny. As of mid-September, 7 of the schools with caution flags were "provisionally accredited" pending a decision on the status of their accreditor, which the Department "derecognized" in

[7]On September 28, 2018, the Department of Education removed national medians from College Scorecard. The medians were designed to give students some context for determining whether a school's scores, such as graduation rates, were high or low. The Comparison Tool, which reports College Scorecard outcome data, was still reporting national medians as of December 6, 2018.

December 2016 because of its "lack of effectiveness" in applying federal recognition criteria.[8]

- *Complaints (K).* The 26 schools had 109 closed veteran complaints reported on the GI Bill Comparison Tool. Nine had no complaints, 13 had 1-3 complaints, 1 had 7 complaints, and 3 schools had from 14 to 51 complaints (Keiser University, Golf Academy of America, and ECPI). As of September 2018, the Department of Veterans Affairs had closed 3,736 complaints and only four schools had more than 50 complaints—University of Phoenix (574), DeVry (214), Colorado Technical University (196), and ECPI (51).[9]

- *Annual tuition and fees (L).* These 26 for-profit schools are much more expensive than the typical community college where in-state tuition averaged $3,810 in 2017-18.[10] Fifteen schools charge between $10,000 and $20,000 annually and nine schools charge more than $20,000. The annual undergraduate tuition and fees are less than $10,000 at only one school, Bellus Academy, a cosmetology school. The most expensive school was the Golf Academy of America, which charges $37,402 a year for its 2-year programs in golf course operations and maintenance. Six public 4-year institutions offer a similar degree program for between about $7,000 and $8,000 per year (in-state tuition).[11]

Outcome Data

- *Retention rates (M).* At six schools the rate at which students returned to continue their education was lower than the national average of 68 percent. At 13 more schools, it ranged from 71 percent to 86 percent (Brightwood College and Pennsylvania Gunsmith School). Seven schools reported no retention rate data.

- *Graduation rates (N).* Graduation rates at the 24 schools with data ranged from 22 percent to 93 percent compared to the national median of 42 percent, which 21 schools exceeded.

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[8]In September 2018, the Department announced that it planned to give ACICS a full year to come into compliance with several accreditation criteria. The Secretary of Education officially reinstated ACICS as an accreditor for 1 year in November 2018. As of October 2018, these 7 schools still had accreditation-related caution flags on the VA Comparison Tool website. As of December 6, 2018, however, the accreditation-related caution flags had been removed.

[9]Colorado Technical University is owned by the Career Education Corporation.

[10]According to the Department of Education, the gainful employment data "…provide further evidence that community colleges offer a better deal than comparable programs at for-profit colleges with higher price tags. As these new data depict, when student debt is considered, community colleges—where students borrow at lower rates and lower dollar amounts—perform particularly well when matched up against comparable for-profit programs."

[11]Citing IPEDS data as its source, the hyperlinked website incorrectly reports that annual tuition at the Golf Academy is about $17,000. According to IPEDS, the school's annual tuition is $37,402 for the 2017-18 academic year.

All of the schools that predominately award certificates exceeded the national median while 3 schools offering either associate's or bachelor's degrees did not. For example, the University of Advancing Technology, which offers both types of degrees, had a 22 percent graduation rate for first-time, full-time students.

- *Earning more than a high-school graduate (O).* Of the 23 schools with earnings data available, fewer than half of former students at 13 institutions were earning more than a high-school graduate 6 years after they first enrolled.[12]

- *Median salaries and ability to pay back loans (P-Q).* At the 21 schools with data, the median salaries of former students with loans ranged from $19,100 (Metro Business College) to $84,400. (St. Paul's School of Nursing). At the 25 schools with data, the percentage of students who were able to pay down their loans ranged from a low of 14 percent at American National University to a high of 76 percent at the Denver College of Nursing.[13] At 18 schools, 50 percent or fewer are paying down their loans, a potential indicator of financial stress.[14]

  Salaries are best understood in the context of other outcomes, including the ability to pay back student loans. The following two schools offer both certificates and associate's degrees.

  - At St. Paul's, the proportion of students paying down their loans (48 percent) was just above the national average of 47 percent. Although all but about 20 percent of students had median student loan debt of $20,000, one of the highest percentages among the 24 schools with data, the school's 3-year loan default rate was 9 percent (11.9 percent within 5 years)—significantly lower than the 16.8 percent national average for 2-year-or-less degree programs in the for-profit sector.

  - In addition to low median salaries, other outcome measures for former students at Metro Business College were poor. For example, 91 percent had student loan debt, 20 percent had defaulted within 3-years of entering repayment (26 percent within 5 years), and just 37 percent were paying down their debt. Although all five of Metro's degree programs passed the Gainful Employment debt-to-earning test, it's important to note that, as is true with any "bright-line" standard, relatively small differences can lead one school to be in the zone and another to pass (see below).

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[12]These data may be aggregated if multiple campuses operate under the same Department of Education identification number.

[13]The data show the proportion of students who have paid down at least $1 of the principal balance of their federal loans within 3 years of leaving school.

[14]These data may be aggregated if multiple campuses operate under the same Department of Education identification number.

- *Gainful Employment (T-X).* Over half (13) of the 21 schools with Gainful Employment data had programs that failed or were at risk of failing (referred to as "zone") the rule's debt-to-earnings ratios, that is, they offered career training programs that left students struggling with student loan payments because the jobs they were promised didn't justify the amount of money they borrowed. Of the 195-degree programs evaluated at these 21 schools, 28 percent failed or were at risk of failing the gainful employment test. The school with the most failing programs was American National University—out of 20 programs evaluated, 8 failed the gainful employment tests, 5 were at risk of failing, and 7 passed.
- *Default rates (Y-Z*). The repercussions of default are serious and long-lasting—tainted credit scores; limited future access to credit markets; and garnishment of wages, tax refunds, and social security/disability payments. Twenty-five of the 26 schools had default data for former students who entered repayment both 3 years or 5 years later.[15] The 5-year default rate was notably higher for all but a few of the 22 schools with both 3- and 5-year default rates, ranging from a .6 percentage point difference up to 20.7 percentage points. Ten schools had more than a 10-percentage point difference. Only one school had a 5-year default rate lower than the national average of 11.3 percent (Unitek College); another school's rate was 44.4 percent (Apex Technical School), an outcome that would have resulted in the loss of access to Title IV had it been the school's 3-year default rate. Currently, the Department of Education only monitors 3-year default rates, imposing sanctions on schools with high default rates.[16] The reason default rates rise sharply after the 3rd year is that some schools encourage borrowers to use repayment options known as deferments or forbearance for the first 3 years after entering repayment, allowing them to stop their payments without going into delinquency or defaulting."[17]

Using Outcome Data to Compare Schools

With the 2016 release of the Department of Education's (ED) *College Scorecard*, researchers are mining the data to evaluate student outcomes. For example, a November 2017 report by Third Way examined outcomes at the top 10 veteran-serving institutions, all but 2 of which were for-profit. As noted above, the GI Bill Comparison Tool imports these data from College Scorecard.

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[15]Three schools were missing 5-year default data and one school did not participate in Title IV.

[16]Schools with default rates of 30 percent or greater for 3 years in a row risk losing access to Title IV funds. Furthermore, any school with a default rate of 40 percent or higher is at risk of immediate loss of eligibility to participate in federal student aid.

[17]Although forbearance and deferment may help borrowers avert default, it comes at a price because their loan balances will continue to grow. During deferment, borrowers are responsible for the accrued interest on unsubsidized loans only. In contrast, borrowers in forbearance are responsible for accrued interest on both subsidized and unsubsidized loan.

Comparisons Are Complicated. Several factors complicate any effort to make apples-to-apples comparisons of outcomes both within a sector (e.g., for-profit) or across institutional sectors (e.g., for-profit vs. public or nonprofit), including differences in:

- the predominant degree earned;
- enrollment patterns (full- vs. part-time);
- the number of credits required to earn a particular degree, and;
- the proportion of students who transfer to and graduate from a different institution.

In general, graduation rates are higher at schools that enroll students full-time in shorter programs compared to schools with a significant percentage of part-time students pursuing degrees that require more coursework.[18]

One additional factor—the composition of the student body—also has an impact on cross-sector comparisons. Schools with selective admissions that cater to the typical college bound high-school graduate have better outcomes than those serving nontraditional students who tend to be older, working, and have families. Nontraditional students, a growing segment of postsecondary education, are often neither first-time nor full-time students.[19] Many such students enroll in for-profit and 2-year or less public-sector institutions and a significant proportion of students at the later transfer to another institution to earn a degree. Finally, graduation rates don't take-into-account students who enroll but fail to complete, a problem that research has shown to be a particular problem in the for-profit sector.

Until 2015, the Department of Education only required schools to report graduation rates for first-time, full-time students, making it difficult to measure outcomes for nontraditional students. To address this longstanding shortcoming, IPEDS outcome measure reporting requirements were expanded to (1) include individuals who were not first-time or full-time students and (2) augment 4- and 6-year graduation rates with completion status after 8-years. These new IPEDS reporting requirements, effective for academic year 2015-16, make it possible to provide far more comprehensive graduation rate data. Currently, the expanded graduation rate data is not reported on the Comparison Tool or College Scorecard website but is available on College Navigator.[20] It is important to note that, in general, IPEDS data is limited to schools

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[18]According to the Department of Education's National Postsecondary Student Aid Study, a greater proportion of veterans who attended for-profit schools in 2011-12 were enrolled full time (80 percent) compared to other sectors (47 percent-64 percent).

[19]Veterans can be classified as nontraditional students. VES analysis of Department of Education survey data from the 2011-12 academic year (Beginning Postsecondary Students) found that, among veterans, 58 percent were 25 or older; 24 percent were attending school part-time; 42 percent had dependents; 20 percent were working full-time; 52 percent were first generation college students,; and 27 percent had attended 2 or more institutions by 2014.

[20]Expanded graduation rates are available on the College Scorecard dataset.

that participate in federal student aid and that schools are not required to report any veteran-specific outcome measures.[21]

[21]Executive Order 13607 directed ED, VA, and the Defense Department to collaborate and develop veteran and servicemember specific outcome measures. As noted earlier, the metrics were developed but were never implemented.

Appendix 1

Data Sources and Glossary of Terms

Our analysis of outcome measures is based on data reported on three federal websites— one established specifically for GI Bill eligible individuals by the Department of Veterans Affairs (GI Bill Comparison Tool) and two created by the Department of Education (the College Scorecard and College Navigator). Outcome data reported on the College Scorecard are imported from the Comparison Tool.[22] These websites provide comparative information on educational institutions for individuals interested in pursuing training, certificates, and college degrees. We also examined the results of the first evaluation of debt-to-earnings ratios for career training programs under the Gainful Employment rule, which measures the return on investment from such programs at public, nonprofit, and for-profit schools.

While working on this report, the Department of Education implemented several changes to the College Scorecard dataset that make it more challenging for consumers to compare institutions. Two significant changes included removal of (1) national medians for each metric that indicated whether a school's outcomes were better or worse than those of other schools, and (2) a metric on the proportion of former students earning more than a high school graduate. The latter data point was removed from the public website but can still be found in the full dataset—if you know it's there and have the time and skills required to locate it.

- *GI Bill Comparison Tool.* We used the Comparison Tool for data on which campuses of the 26 CECU schools had degree programs that were GI Bill eligible; GI Bill enrollment; caution flags; and complaints across all campuses. We also included national medians for the Scorecard outcome measures, which are still reported on the Comparison Tool. The data was extracted on September 14, 2018.

- *College Scorecard.* We used the Scorecard dataset to extract school outcome data (retention, graduation, earnings, repayment, student loan debt); predominate degree program offered (certificate, associate's, bachelor's); and most popular degree program. Although graduation and retention rates are reported separately for each campus, the data for earnings, repayment, and loan debt may for multiple school locations if they all operate under the same Department of Education identification number.[23] The data was downloaded on October 7, 2018.

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[22]Outcome measures reported on the Comparison Tool may differ from those on College Scorecard because the two databases have different update cycles.

[23]The U.S. Department of Education's Office of Postsecondary Education (OPE) uses an OPEID identification number to identify schools that participate in federal student aid.

College Scorecard reports outcome data for students in general. Only limited data is available on outcomes for veterans. Although outcome-measure specifications for military-connected students were developed in 2013, they were never implemented. VA is now reporting some data on retention and graduation rates for GI Bill users on its Comparison Tool. Because the data are only for a limited number of schools and because of some methodological concerns, we chose to report Scorecard outcome data for *any* student who attended a CECU member institution regardless of veteran status.[24]

- *Gainful Employment*. In January 2017, the Department of Education released the first debt-to-earnings rates for career training programs, which we analyzed for the 26 CECU schools.[25] The data showed that, while many postsecondary programs offer value to students, there were a significant number of career training programs—specifically for-profit programs—that did not provide their graduates with a reasonable return on investment.[26]

- *College Navigator*. We used College Navigator to obtain 3-year cohort default data for the 26 CECU schools and downloaded that data on September 14, 2018.[27] To report on the 5-year cohort default rates of the 26 CECU schools, we used data obtained by the Center for American Progress from the Department of Education through the Freedom of Information Act. These data may be aggregated for all schools under the same ownership if they use the same Department of Education identification number.

Not all 26 CECU schools had outcome data—shown as “no data” on the hyperlinked spreadsheet. College Scorecard does not report the data for some schools because of the small number of student and confidentiality concerns. In addition, the Scorecard only reports on schools that participate in federal student aid and one of the 26 schools does not. Finally, data appear to me missing for some measures.

School Location

Although the CECU letter was signed by 225 school officials, they did not always identify a specific campus affiliation. Moreover, in some instances, officials from several different

[24]For example, VA graduation rates only capture veterans who earned a degree while using benefits, which could understate the number of veteran graduates.

[25]For schools with multiple campuses operating under the same OPEID, the Department reports aggregated gainful employment data for the location that serves as the school’s main campus. For example, Golf Academy of America is reported under Virginia College, which owns both campus brands.

[26]The rule also required schools to use a standard disclosure template to provide students with clear data in several areas, including on the average earnings of graduates.

[27]Data on College Navigator is reported by schools through the Integrated Postsecondary Data System (IPEDS)—a series of surveys that collect data on schools that participate in Title IV, federal student aid.

campuses under common ownership signed the letter. To address these issues, the spreadsheet generally contains data for the campus enrolling the most GI Bill students as reported on the Comparison Tool. Other campuses may have better or worse outcomes. To illustrate this point, the spreadsheet shows outcomes for two Spartan campuses, one in Oklahoma and another in California. Many of the outcomes are different for each of these campuses, as they may be for other institutions with multiple campuses. We excluded Spartan's California campus from our count of the 26 CECU school locations and from our analysis of outcome measures.

Predominate Degree Program Offered

The 26 schools are sorted in the spreadsheet by the "level" of program they offer—certificates (less than 2 year); associate's (2 year); bachelor's (4 years or higher). These program classifications reflect the predominate degree earned by graduates and not necessarily the highest degree level offered by each school.

As shown in table 1, it is not uncommon for an institution to offer multiple program levels, e.g., certificates and associate's degrees or bachelor's plus post-graduate degrees such as master's and PhDs. Of the 2,565 for-profit institutions in College Scorecard, about two-thirds confer only certificates and the majority of students who graduate from 2-year for-profit schools earn certificates even though the institutions offer associate's degrees. In contrast, far fewer public institutions (330) confer just certificates and only 28 percent of graduates at 2-year publics leave with certificates. Under "Interpreting the Data and Comparing Outcomes," this report will explain why it's important to take program level into consideration when comparing school outcomes.

TABLE 1: Percentage of Students Completing a Degree by Institutional Sector and Degree Level and Number of Schools/Students, 2015-16

Sector	Cert	AA	BA	Post-grad only	No. of schools	Students
			< 2-year			
For-profit	100%				1,684	272,493
Public	100%				330	92,940
Nonprofit	100%				138	21,777
			2-year			
For-profit	63%	37%			446	214,325
Public	28%	72%			933	5,137,792
Nonprofit	37%	63%			98	33,497
			4-year			
For-profit	10%	33%	49%	9%	435	738,571
Public	1%	12%	84%	3%	706	6,467,957
Nonprofit	2%	5%	78%	15%	1,579	2,723,256
Total	**44%**	**19%**	**32%**	**5%**	**6,349**	**15,702,608**

Source: VES analysis of College Scorecard data, academic year 2015-16.

Most Popular Program

The 26 schools offer numerous programs of study. College Scorecard lists the 5 largest degree programs as measured by the share of degrees and certificates awarded. The spreadsheet highlights the program with the most graduates.

GI Bill Eligible Campuses

Degree programs, not schools, are approved to participate in the GI Bill. The Comparison Tool shows the number of schools operating under the same name and ownership offering GI Bill eligible degree programs. For example, Fortis College has 23 campuses that offer GI Bill eligible programs while Apex Technical College only operates one campus.

GI Bill Enrollment

The Comparison Tool is currently reporting 12-month enrollment for calendar year 2017, which consists of any GI Bill eligible individual who was enrolled at an institution during that time period—veteran or family member, qualifying servicemember, or survivors of a servicemember who died while on active duty. Because some individuals leave or graduate, the number of students at a specific point in time is smaller.

Caution Flags

A caution flag is an indicator that potential students should pay attention to and consider before enrolling in a program of education because it signifies that VA or other federal agencies (e.g. DOD, Department of Education) have applied increased regulatory or legal scrutiny to an institution. Currently, the Comparison Tool displays caution flags for the following eight issues: (1) Heightened Cash Monitoring by the Department of Education; (2) accreditation; (3) DOD probation for military Tuition Assistance; (4) suit filed by the Federal Trade Commission for deceptive advertising; (5) settlement reached with the Federal Trade Commission; (6) school suspended for 85/15 violation (flight programs); (7) denial of recertification application to participate in federal student financial assistance program; and (8) school operating under provisional accreditation. Over time, the number of issues that merit caution flags has increased.

Complaints

The Comparison Tool shows the number of closed complaints filed against each campus as well as the total for all campuses that operate under the same brand name. These complaints alleged a violation of protections outlined in Executive Order 13607, the Principles of Excellence, including misrepresentations about cost, quality, student loans, or accreditation. The Comparison Tool also reports the types of misrepresentations identified in each closed complaint, e.g., financial issues (tuition and fees). Overall, financial issues and quality of education were the top two closed complaint categories.

Tuition and Fees

VA reports total undergraduate tuition and fees for an academic year for each institution that participates in the GI Bill. These data are also reported on College Navigator. In general, the data are for the 2017-18 academic year. The “costs” reported on College Scorecard are the net price for financial aid recipients, after subtracting the aid from the institution, state, or federal government, and are not comparable.

Retention Rates

Retention is the share of first-time, full-time undergraduates who returned to the institution after their freshman year.

Graduation Rates

The graduation rate is the number of students earning a degree within 150% of the expected time to graduation. For example, a graduation rate at a 4-year institution is the percentage of students who obtained a degree within 6 years and at a 2-year institution within 3 years. These rates are only for full-time students enrolled for the first-time.

Median Salary After Attending and Percentage Earning More than a High School Graduate

Salaries are the median earnings, 10 years after they started school, of former students who are employed and who received federal financial aid.[28] In addition, the College Scorecard dataset contains statistics on the share of former students earning more than $28,000—the average earnings of high school graduates aged 25-34, 6 years after they first enroll.[29] These data may be aggregated if multiple campuses operate under the same Department of Education identification number.

Percentage Paying Down Debt

For students with federal loan debt, this metric shows the share of students who have paid down at least $1 on the principal of their federal student loan balance on their federal loans

[28]On September 28, 2018, the Department of Education removed the outcome measure that captured both employed and unemployed former student 6 years after enrolling from the public website. It is still available in the Scorecard dataset. Although the new metric provides a longer-term perspective, it offers a rosier picture of earnings.

[29]On September 28, 2018, the Department of Education removed this metric from the consumer search site but retained it in the underlying database. It also increased the $25,000 threshold to $28,000 to reflect inflation. The data reported in this paper were collected prior to this change and are based on the original $25,000 threshold.

within 3 years of leaving school and entering repayment. These data may be aggregated if multiple campuses operate under the same Department of Education identification number.

Median Federal Student Loan Debt of Graduates and Percentage with Federal Student Loans

These data represent the median federal student loan debt of graduates and the share of undergraduate students who took out federal loans to help pay for college. These data may be aggregated if multiple locations operate under the same Department of Education identification number.

Gainful Employment

The Gainful Employment regulations look at two debt-to earning thresholds—total income (8 percent) and discretionary income (20 percent). For failing programs, the annual loan payment is greater than 30 percent of discretionary income and greater than 12 percent of total earnings. For programs "in the zone," annual loan payments are between 20 and 30 percent of discretionary income or between 8 and 12 percent of total earnings. For most programs the debt-to-earnings rates included students who graduated between July 1, 2010, and June 30, 2012. Over 800 academic programs failed these tests and another 1,239 were determined to be "in zone." Programs that receive four consecutive years of zone or fail rates will become ineligible for federal student aid.

In June 2017, the Department of Education announced it would give schools additional time to comply with the Gainful Employment rule's disclosure requirements and to file alternative earnings appeals. It also announced its intent to develop a new regulation through negotiated rulemaking. In August 2018, the Department announced that it planned to rescind the Gainful Employment rule.

Cohort Default Rate

The cohort default rate is the percentage of a school's borrowers who enter repayment on federal student loans and default after 3 years. We show two cohort default rates in our outcome measure's spreadsheet.

- Column Y is the 3-year default rate—the proportion of borrowers who entered repayment during 2012 and had defaulted by 2014. These data are from College Navigator and are not available on the Comparison Tool.
- Column Z is the 5-year default rate—the proportion of borrowers who entered repayment during 2012 and had defaulted by 2016.

The 3-year default rate understates institutional default rates, particularly in the for-profit sector, because it tracks default for only a few years. According to a recent analysis based on data obtained from the Department of Education though the Freedom of Information Act, almost half of borrowers at for-profit school faced some type of loan distress 5 years into repayment, such as severe delinquency; moreover, 25 percent had defaulted by 2016, well above the 3-year, 2012-2014 rate of about 11 percent. According to this analysis "Most students who defaulted between years 3 and 5 attended a for-profit college."

National Averages

To put the outcome measures in perspective and allow cross-school comparisons, both the Comparison Tool and College Scorecard compare data for each institution to the national average for all schools. On September 28, 2018, after we had captured data, these benchmarks were removed from the Scorecard website. The Department of Education also reports cohort default rates by sector for less than 2-year schools, 2-year schools, and 4-year institutions, which are shown in the three "yellow" spreadsheet rows that identify the degree level offered by schools.