



# VETERANS EDUCATION SUCCESS

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# SHOULD COLLEGES SPEND THE GI BILL ON VETERANS' EDUCATION OR LATE NIGHT TV ADS?

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**RESEARCH  
REPORT**



*Should Colleges Spend the GI Bill on Veterans' Education or Late Night TV Ads?  
And Which Colleges Deliver the Best Instructional Bang for the GI Bill Buck?*

### **Highlights**

- By analyzing US Education Department data on college expenditures and student outcomes, it is possible to report how much or how little colleges are spending on student instruction and whether students are benefitting.
- Of the 10 colleges charging taxpayers the most overall Post-9/11 GI Bill tuition and fee payments from FY 2009-17, totaling \$5.4 billion, seven spent less than one-third of students' gross tuition and fees on instruction in 2017 and struggled with outcomes: Less than 28% of their students completed an award or degree and only half (52%) earned more than a high school graduate.
- In contrast, students who attended top-10-grossing GI Bill schools that spent more than one-third of gross tuition on instruction had a 60% completion rate, and two-thirds earned more than the average high school graduate.
- Overall, 378 institutions meet our metrics for "Best Instructional Bang for the GI Bill Buck." These schools spend at least 50% on instruction, while also showing that at least half of their students complete and earn more than the average high school graduate after attending.
- Four schools represent the "Bottom of the Barrel," charging taxpayers \$83 million in Post-9/11 GI Bill tuition and fees in 2017, but spending less than 10% of their gross tuition revenue on student instruction. The three of these four for which outcomes data is available left only one in four students (26%) with a credential in hand and just a little more than half (51%) earning more than a high school graduate.

### **Introduction**

Every year, around 700,000 Post-9/11 GI Bill students enroll in an institution of postsecondary education,<sup>1</sup> a benefit earned through sacrifice and service to our nation. The GI Bill represents America's thanks for veterans' military service. It is also an economic investment designed to ensure a successful transition from military service to civilian employment through needed postsecondary skills and training.

Most veterans – and taxpayers – assume colleges are spending the GI Bill to give veterans an education.

But are colleges honoring the Congressional intent and taxpayer investment?

Veterans Education Success examined U.S. Education Department data on college spending as well as student outcome metrics to identify "Best Instructional Bang for the GI Bill Buck" colleges that dedicate the most to veterans' education and have positive student outcomes, as well as "Bottom of the Barrel" schools that divert most tuition away from students and, not surprisingly, have worse student outcomes.

To be clear, the vast majority of colleges serving veterans – predominantly public and nonprofit colleges – often spend a large proportion of tuition on students and produce solid student outcomes.

Indeed, many colleges serving large numbers of veterans at the certificate level, associate's level, and bachelor's level – from Lakeshore Technical College, SUNY Polytechnic, and Bismarck State College to Yale University and Stanford University – actually spend *more* on a veteran's education than they charge in tuition, and – unsurprisingly – deliver high graduation rates and future earnings.

In addition, veterans, as a whole, show stronger success in college than their non-veteran, independent student counterparts, including significantly higher completion rates than their non-veteran counterparts.<sup>2</sup>

But it turns out some postsecondary institutions are not honoring veterans' service and the Congressional investment. In fact, many of the institutions charging taxpayers the largest overall amount of GI Bill funds largely divert those funds away from veterans and towards unscrupulous spending that has nothing to do with education at all, such as late night TV ads and aggressive call centers that cold call servicemembers.

While there are rules governing which postsecondary institutions may be approved to receive GI Bill funds, no restrictions exist on how those institutions must allocate GI Bill revenue once they enroll a veteran. Nor are there any requirements that GI Bill funds or other federal student aid actually be spent serving the students they enroll.

Other industries provide better assurance that a person's benefits are spent on him or her. For example, health insurance companies are required to spend at least 80% of patient premiums on patient care and quality improvements.<sup>3</sup>

Is it appropriate for colleges to charge taxpayers for GI Bill funds and take veterans' one-shot at their hard-earned benefit, but then divert those funds away from veterans' education? Does Congress owe it to veterans (and taxpayers) to more carefully guard veterans' hard-earned GI Bill?

### **Methodology**

This report pulls information from the 2016-17 Integrated Postsecondary Education Data System (IPEDS) Finance Survey.<sup>4</sup> Other information on post-enrollment earnings and completion outcomes are gathered from the U.S. Department of Education's IPEDS Outcome Measures Survey<sup>5</sup> and College Scorecard database.<sup>6</sup> Information on Post-9/11 GI Bill tuition and fee payments comes from the US Department of Veterans Affairs (VA).<sup>7</sup>

To determine the proportion of institutional expenses spent on instruction, we examine the question directly from the student's perspective: How much are students paying in tuition and how much of that tuition is being spent on their education? Our calculations are based on the institution's gross tuition, rather than just the GI Bill tuition and fee payments, because many student veterans pay for tuition through a combination of GI Bill benefits, grants, scholarships, loans, and personal funds. This calculation helps answer the question of how much of a veteran's tuition money is going toward teaching and learning, rather than non-instructional costs.

### ***Total Amount Spent on Instruction*** ***Gross Tuition and Fees Revenue***

*How to read the findings:* If an institution shows a ratio of 100% (total spent on instruction divided by the institution's gross tuition and fees revenue), it can be assumed that for every \$1 an institution receives in gross tuition, it is providing \$1 of instruction in return. If, instead, an institution shows a

ratio of 50%, a student is getting only half of her or his tuition allocated toward instruction, while the rest is spent on non-instructional expenses.

*What goes into the calculation for instructional spending?:* We define “instruction” in this paper in accordance with the Education Department’s definition in IPEDS. Specifically, IPEDS tracks and reports each college’s spending in several categories, including the category of “instruction.”

Spending on “instruction” matters because it is correlated with some of the most important aspects of attending an institution of higher education, including earning a degree<sup>8</sup> and finding meaningful employment.<sup>9</sup> In fact, one study showed that instructional spending had the single biggest impact on students’ success in obtaining meaningful employment outcomes, especially for disadvantaged students.<sup>10</sup> In short, teaching and instruction are likely to increase student success, even for those who enter less prepared. This is why focusing on student instruction is so important.

Other expense categories tracked by IPEDS are not counted as instruction because they often include spending that is unrelated to teaching and learning for enrolled students. For example, although the “student services” category in IPEDS includes such subcategories as social and cultural development and career guidance – which might aid a student’s success – it also includes a college’s spending on recruiting and admissions, including the large call centers and advertising that the lowest quality schools heavily invest in and which contribute nothing to enrolled students’ learning.<sup>11</sup> In short, some institutions report marketing and recruitment activities as student support, even though they do not relate to supporting current students.

Similarly, the “academic support” category within IPEDS includes some education related activities, such as course and curriculum development and educational media services that might benefit a student’s learning, but it also includes many administrative expenses that may be unrelated to student learning. For example, institutions can include executive compensation as “academic support” in some cases, as well as costs associated with operating museums and galleries as academic support – which can be large and costly at some colleges and are often unrelated to and even physically distant from student learning.<sup>12</sup> Because of these limitations, only expenses specifically counted by IPEDS as instruction are counted within instructional costs, mirroring the IPEDS methodology.

*Calculating gross tuition and fees:* When calculating a college’s gross tuition and fees, we also include discounts and allowances that are applied to tuition and fees from the IPEDS finance survey. Doing so helps account for other funding sources beyond cash that are also used to pay for students’ tuition and fees, such as Pell Grants, other federal grants, state, local, and institutional grants and scholarships.<sup>13</sup> While GI Bill benefits are already counted as tuition and fees in IPEDS and are therefore unaffected by the inclusion of discounts and allowances,<sup>14</sup> this inclusion helps account for differences in how institutions report the use of Pell Grants to IPEDS, a grant that many low- and moderate-income students use to pay for college.<sup>15</sup> Specifically, nonprofit and for-profit institutions use standards set by the Financial Accounting Standards Board (FASB) while public institutions generally use standards set by the Government Accounting Standards Board (GASB).<sup>16</sup> One of the main differences between the two reporting standards is that institutions reporting under GASB report Pell Grants as a discount or allowance when they are used to pay for a student’s tuition or fees. However, institutions reporting under FASB typically report Pell grants as tuition and fees revenue, rather than as a discount or allowance.<sup>17</sup> Given that nearly \$30 billion in Pell Grants went to institutions last year alone,<sup>18</sup> and it remains a key source of paying tuition for many low-income students, these differences in how Pell Grants are reported can cause significant variations in how tuition revenue is calculated across

different kinds of institutions. By including discounts and allowances within the equation, this provides a better estimate as to what was actually charged to the consumer, or the market price of a given educational service, regardless of which set of accounting standards were used.<sup>19</sup>

*Tracking Student Outcomes:* We use two measures from the Education Department to help determine whether institutions are providing good outcomes for the students they enroll. While the Education Department does not provide disaggregated student outcome data for the GI Bill beneficiary population, its data provides insight into the institutions where student veterans and non-veterans may be most likely to succeed. First, we use the IPEDS Outcome Measure survey<sup>20</sup> to help determine whether students are likely to complete an award or degree within eight years of entering. While this measure is limited to degree-granting institutions, it includes first-time, part-time, and transfer-in students within its calculation, providing a much more comprehensive rate than the traditional statutory graduation rate that measured only full-time students who entered for the first time.<sup>21</sup> It also measures students who enter throughout all 12 months of the year, rather than just the Fall. Both of these factors make this completion rate more representative of veterans' higher education experiences, which are demographically similar to independent students.<sup>22</sup> While the Outcome Measures are more comprehensive in that they include part-time and transfer-in students, they do not include information on students who transfer-out of an institution and graduate from somewhere else. Therefore, the completion rate reflects those who entered an institution and earned an award or degree from that institutions within eight years of entering. We also use earnings data from the Education Department's College Scorecard to determine the percentage of student borrowers and grant recipients who are able to earn more than the average high school graduate — measured by the Education Department at \$28,000 per year — within six years of entering the institution.<sup>23</sup> If most students who attended an institution earn below this amount, it may not be financially worthwhile to attend the institution in the first place.

*Tracking colleges:* Finally, we track colleges in accordance with the Education Department's definition of an institution at the 6-digit OPEID level.<sup>24</sup> Previous reports from Veterans Education Success have calculated overall GI Bill revenues at each institution or parent company using the Education Department's unique 6-digit OPEID identifier to aggregate linked institutions and using IPEDS to identify common ownership or institutions that report as part of a multi-campus organization or college system.<sup>25</sup> In this report, in order to track spending, which is presented by the Education Department at the 6-digit OPEID-level, we report each college's data at the 6-digit OPEID-level. Some institutions with multiple campuses report their data to the Education Department using a single 6-digit OPEID identifier, as Pennsylvania State University does, while other institutions, like the multiple campuses in the California State system, each report under a unique 6-digit identifier. This report follows the 6-digit OPEID filings, in the manner each institution chooses to report to the Department. In any event, this report's list of the 10 institutions receiving the most GI Bill funds (by OPEID filings) has very close overlap to the list of 10 institutions when aggregated in our [prior report](#).

### **Billions in GI Bill Funds Flow to Institutions Every Year**

From fiscal years 2009 through 2017, nearly \$35 billion dollars in Post-9/11 GI Bill tuition and fee payments went to institutions across the United States, \$5 billion in fiscal year 2017 alone.<sup>26</sup>

Each college sets its own tuition, and VA will cover whatever the tuition is at a particular college, up to nearly \$23,000 in Post-9/11 GI Bill funds, in addition to offering Yellow Ribbon matching funds to cover remaining tuition charges.<sup>27</sup> Therefore, the amount VA (and taxpayers) pay for a GI Bill beneficiary depends entirely on which college the veteran attends and how high that college sets its

tuition.<sup>28</sup>

The goal of both taxpayers and Congress in disbursing these funds is to ensure a successful transition for veterans from military service to civilian employment through postsecondary skills and training. Are colleges honoring the Congressional intent and taxpayer investment?

Table 1 presents the colleges (per 6-digit OPEID) that received the most Post-9/11 GI Bill funding from FY 2009 through FY 2017, ordered by how much Post-9/11 GI Bill funding they received.<sup>29</sup>

**Table 1: Schools That Received the Most GI Bill Funds FY 2009-2017: Percentage of Gross Tuition and Fees Spent on Student Instruction**

Institution	Type	Sector	Total GI Bill Tuition and Fees 2009-17	Total GI Bill Tuition and Fees 2017	Percentage of Gross Tuition and Fees Spent on Instruction in 2017
UNIVERSITY OF PHOENIX	Bachelor's	For-profit	\$1,936,128,708	\$192,463,300	15.3%
DEVRY UNIVERSITY	Bachelor's	For-profit	\$776,840,792	\$68,988,234	12.4%
STRAYER UNIVERSITY	Bachelor's	For-profit	\$490,445,709	\$57,056,521	10.9%
EMBRY-RIDDLE AERONAUTICAL UNIVERSITY	Bachelor's	Private, non-profit	\$366,580,569	\$44,658,536	41.4%
UNIVERSITY OF MARYLAND UNIVERSITY COLLEGE	Bachelor's	Public	\$359,982,581	\$63,283,316	31.7%
AMERICAN PUBLIC UNIVERSITY SYSTEM	Bachelor's	For-profit	\$336,197,612	\$58,764,091	23.1%
ECPI UNIVERSITY	Associate's	For-profit	\$335,227,624	\$44,440,711	38.3%
COLORADO TECHNICAL UNIVERSITY	Bachelor's	For-profit	\$284,479,493	\$47,958,628	8.2%
FULL SAIL UNIVERSITY	Bachelor's	For-profit	\$276,845,143	\$43,744,000	24.7%
PENNSYLVANIA STATE UNIVERSITY	Bachelor's	Public	\$257,127,833	\$38,337,031	70.1%

As Table 1 makes clear, many of the 10 institutions receiving the most Post-9/11 GI Bill tuition and fee payment since its inception have diverted those funds towards costs largely unrelated to the veterans' education. Out of the 10 colleges receiving the most Post-9/11 GI Bill funds from fiscal years 2009-2017, totaling \$5.4 billion, only three spent more than one-third of students' gross tuition and fees on instruction in 2017.<sup>30</sup> The three schools receiving the most Post-9/11 GI Bill in the nation spent little more than 15%, 12%, and 10% of gross tuition revenue, respectively, on educating students.

On the other hand, three colleges dedicated more of students' gross tuition and fees to instruction than their other top 10 GI Bill-grossing peers: The non-profit Embry-Riddle Aeronautical University, the for-profit ECPI University, and the public Pennsylvania State University, which spent 41.4%, 38.3%, and 70.1%, respectively, of tuition on student instruction. Yet, only one of these, Pennsylvania State University, spent more than 50% of gross tuition revenue on instructional expenses.

At the opposite extreme, Colorado Technical University, which received nearly \$50 million in Post-9/11 GI Bill tuition and fee payments in fiscal year 2017 alone, allocated only 8.2% percent of its gross tuition revenue toward actual student instruction. According to its 10K annual report filed with the US Securities and Exchange Commission, Colorado Tech's parent company, Career Education Corporation, diverted more than 37% of revenues to recruiting and marketing in 2017 (and a similar portion in 2018), and paid executive compensation several times higher than Harvard's.<sup>31</sup>

Noticeably, many of these institutions — such as University of Phoenix, Strayer University, University of Maryland University College, and American Public University System<sup>32</sup> — have historically served many students through online education, rather than through brick and mortar institutions. Yet, even with less expenses needed for physical locations, costs saved at these institutions that primarily offer online education are apparently not being passed on to the student in the form of lower tuition.<sup>33</sup> If

they were, it could help alleviate the problem of skyrocketing tuition and student debt, both of which have steadily grown over the past decade.<sup>34</sup>

### **Instructional Spending, College Completion, and Employment Success at Top GI Bill-Receiving Institutions**

One way to determine the “return on investment” for students and taxpayers is to examine whether students are likely to succeed at a specific school.

To determine how well students perform at the top 10 GI Bill-receiving institutions, we examined their instructional spending, completion rates, and employment outcomes for former students. Table 2 presents a list of institutions that received the most GI Bill funding from fiscal years 2009-2017, including the percentage of students who earned a certificate or degree at that institution within eight years of entering, as well as the percentage of students—both graduates and those who failed to earn a degree—who earn more than the average high school graduate six years after enrollment — a metric used by the Education Department to track whether a college provides an economic benefit to those who enroll. The chart below is sorted by the percentage of former students who complete a certificate or degree within eight years of entering, as students who start college but never finish are often left in one of the most vulnerable positions, with educational debt but no college degree.<sup>35</sup>

**Table 2: Schools That Received the Most GI Bill Funds FY 2009-2017: Percentage of Students Graduating and Earning More Than the Average High School Graduate**

Institution	Type	Sector	Completion Rate Within 8 Years	Percentage of Students Earning More Than the Avg. HS Graduate	Percentage of Gross Tuition and Fees Spent on Instruction in 2017
PENNSYLVANIA STATE UNIVERSITY	Bachelor's	Public	68.4%	70.2%	70.1%
FULL SAIL UNIVERSITY	Bachelor's	For-profit	54.7%	52.3%	24.7%
ECPI UNIVERSITY	Associate's	For-profit	52.3%	52.3%	38.3%
EMBRY-RIDDLE AERONAUTICAL UNIVERSITY	Bachelor's	Private, non-profit	41.8%	77.0%	41.4%
UNIVERSITY OF PHOENIX	Bachelor's	For-profit	29.0%	50.8%	15.3%
COLORADO TECHNICAL UNIVERSITY	Bachelor's	For-profit	27.5%	49.8%	8.2%
UNIVERSITY OF MARYLAND UNIVERSITY COLLEGE	Bachelor's	Public	25.8%	70.7%	31.7%
AMERICAN PUBLIC UNIVERSITY SYSTEM	Bachelor's	For-profit	23.6%	70.1%	23.1%
DEVRY UNIVERSITY	Bachelor's	For-profit	22.1%	57.9%	12.4%
STRAYER UNIVERSITY	Bachelor's	For-profit	17.9%	59.0%	10.9%

Unfortunately, most of the institutions that received the largest amount of GI Bill funds from fiscal years 2009-2017 failed to graduate most students who enrolled.<sup>36</sup> In fact, seven out of the 10 top GI Bill-receiving institutions showed a completion rate of less than 50%, meaning that more than one out of every two students who entered the institution left without any credential or degree, even eight years later.

And, while 88% of all incoming freshman cite “being able to get a better job” as a very important reason to attend college,<sup>37</sup> the institutions above often failed to deliver on this promise. Many students received no wage premium by attending these institutions in the first place. Out of the 449,749 student borrowers and grant recipients who attended these schools, 209,243 — or 47% — were unable to make more than the average high school graduate, even six years after entering the institution.

However, there are differences in student outcomes between the top-grossing GI Bill schools that spent less than one-third of gross tuition on instruction, and those that spent more than one-third. Fewer than three out of 10 (28%) students earned an award or degree from the seven institutions that spent less than one-third of gross tuition on instruction, and only half (52%) earned more than a high school graduate after attending those schools. In contrast, students who attended the three top-grossing GI Bill schools that spent more than one-third of gross tuition on instruction are shown to do better. Six out of 10 students at these institutions completed an award or degree, and two-thirds earned more than the average high school graduate within six years of their initial enrollment.

This also matches the stronger outcomes generally found at the vast majority of GI Bill-serving colleges – most of them public and nonprofit – which spend higher proportions of tuition on instruction and have better student outcomes.

When veterans serve the nation and earn the GI Bill, shouldn't they reasonably expect that their GI Bill benefits will give them a quality education? Shouldn't colleges be obligated to spend GI Bill funds as Congress and the taxpayers intended?

### **The Best Instructional Bang for The GI Bill Buck**

Some institutions provide beneficiaries a better instructional bang for their GI Bill buck. To assess if other institutions outside of the top 10 GI Bill-grossing schools are showing better outcomes and are investing more of the veteran's GI Bill in his or her education, we looked at all institutions that have received at least \$100,000 in GI Bill payments in 2017 (to exclude schools with very little GI Bill enrollment) and spent at least 50% of gross tuition revenue on instructional spending.

To ensure these schools really do provide a good instructional bang for the veteran's GI Bill buck, schools that made this list were also required to show that a majority of their students succeeded in obtaining a college credential and earned more than the average high school graduate after attending.

Overall, 378 schools met these benchmarks, representing the full spectrum of college sector: 297 are public, 75 are private non-profit, and six are from the for-profit sector. While most of these schools (346) grant primarily bachelor's degrees, 16 award associate's degrees, and 16 are certificate-granting institutions.

Table 3 presents the top five certificate, associate's and bachelor's degree-granting institutions that hit these benchmarks, ordered by schools that spend the largest percentage of gross tuition on instructional activities.

**Table 3: Best Instructional Bang for the GI Bill Buck:  
Largest Instructional Spending per Tuition Dollars for Schools That Completed at least 50% of  
Students and Showed More Than 50% Earning More Than a High School Graduate**

Institution	Sector	Total GI Bill Tuition and Fees 2009-17	Total GI Bill Tuition and Fees 2017	Percentage of Gross Tuition and Fees Spent on Instruction in 2017	Completion Rate Within 8 Years	Percentage of Students Earning More Than the Avg. HS Grad
<b>Bachelor's Degree-Granting Institutions</b>						
YALE UNIVERSITY	Private, non-profit	\$7,801,921	\$1,446,317	309.0%	97.1%	78.6%
WASHINGTON UNIVERSITY IN ST. LOUIS	Private, non-profit	\$16,459,625	\$3,322,768	289.5%	91.6%	82.1%
UNIVERSITY OF ARKANSAS FOR MEDICAL SCIENCES	Public	\$2,674,656	\$427,085	265.4%	78.4%	89.0%
STANFORD UNIVERSITY	Private, non-profit	\$11,489,565	\$1,102,760	248.3%	96.2%	84.1%
STATE UNIVERSITY OF NEW YORK POLYTECHNIC INSTITUTE	Public	\$1,725,799	\$168,804	220.9%	52.7%	73.5%
<b>Associate's Degree-Granting Institutions</b>						
BISMARCK STATE COLLEGE	Public	\$3,852,430	\$539,794	156.6%	50.9%	72.7%
SUNY COLLEGE OF TECHNOLOGY AT ALFRED	Public	\$2,677,948	\$385,561	154.9%	51.2%	60.9%
STATE TECHNICAL COLLEGE OF MISSOURI	Public	\$972,599	\$171,292	147.6%	68.0%	71.4%
SUNY COLLEGE OF TECHNOLOGY AT DELHI	Public	\$1,327,410	\$185,083	147.2%	51.8%	54.2%
THADDEUS STEVENS COLLEGE OF TECHNOLOGY	Public	\$866,800	\$168,580	132.5%	65.5%	64.2%
<b>Certificate-Granting Institutions</b>						
WISCONSIN INDIANHEAD TECHNICAL COLLEGE	Public	\$1,616,134	\$233,733	641.6%	50.8%	53.0%
LAKESHORE TECHNICAL COLLEGE	Public	\$1,085,613	\$194,983	396.8%	53.1%	56.9%
NORTHEAST WISCONSIN TECHNICAL COLLEGE	Public	\$4,077,040	\$607,117	318.1%	52.0%	56.7%
FOX VALLEY TECHNICAL COLLEGE	Public	\$6,025,079	\$898,600	316.1%	59.8%	58.6%
NORTHCENTRAL TECHNICAL COLLEGE	Public	\$1,768,413	\$294,031	310.8%	61.9%	55.1%

Some schools on this list show a high ratio of gross tuition and fees vs. the amount spent on student instruction. When institutions show a ratio of more than 100%, it often indicates revenues from other sources beyond tuition, such as state and local appropriations as, for example, is the case with Wisconsin Indianhead Technical College.

From the student perspective, it makes little difference where the non-tuition revenue is coming from; what matters is their return on investment and whether they are likely to succeed. Even with revenues from state and local appropriations, many other colleges still fail to invest in instruction and fail to show strong outcomes for the students they serve. That makes these Best Instructional Bang for the GI Bill Buck schools stand out even more.

### **Better For-Profit College Options**

While the best instructional bang for the GI Bill Buck schools come from the public and nonprofit sector, there are six for-profit schools that also fare well on these benchmarks (although not nearing the best institutions overall), indicating that high instructional spending and good student outcomes are possible within all sectors of higher education.

**Table 4: Better For-Profit College Options:  
For-Profit Institutions With Higher Expenditures on Instruction That Graduated at least 50% of  
Students and Showed More Than 50% Earning More Than a High School Graduate<sup>38</sup>**

Institution	Type	Sector	Total GI Bill Tuition and Fees 2009-17	Total GI Bill Tuition and Fees 2017	Percentage of Gross Tuition and Fees Spent on Instruction in 2017	Completion Rate Within 8 Years	Percentage of Students Earning More Than the Avg. HS Graduate
PROFESSIONAL GOLFERS CAREER COLLEGE	Associate's	For-profit	\$4,889,086	\$458,331	104.7%	85.8%	52.4%
FOX COLLEGE	Associate's	For-profit	\$762,978	\$162,343	70.3%	65.9%	56.6%
SWEDISH INSTITUTE	Associate's	For-profit	\$2,235,926	\$531,941	58.4%	59.6%	52.2%
BOB JONES UNIVERSITY	Bachelor's	For-profit	\$3,670,606	\$332,215	53.6%	59.4%	51.0%
HONDROS COLLEGE	Certificate	For-profit	\$4,247,239	\$461,610	52.9%	74.8%	74.0%
CONCORDE CAREER COLLEGE	Certificate	For-profit	\$3,707,861	\$343,715	51.5%	83.1%	57.2%

These six schools, which received a significant amount of GI Bill funds, spent more on student instruction and had better student outcomes, as most students who attended completed the degree and earned more than a high school graduate.

**The Bottom of the Barrel**

At the other end of the spectrum are colleges with bad student outcomes and abysmal spending on student instruction. Table 5 lists the amount of GI Bill funds spent on non-instructional activities in fiscal year 2017 at institutions that allocated less than 30% of gross tuition revenue toward student instruction. We limit our findings to institutions that received at least \$100,000 in GI Bill benefits during 2017, to weed out schools with very little GI Bill enrollment.

**Table 5: Bottom of the Barrel: Overall Numbers<sup>39</sup>**

Gross Tuition and Fees Spent on Instruction	Number of Institutions	GI Bill Funds Received in 2017	GI Bill Funds Used on Non-Instructional Related Activities in 2017
Less Than 10%	4	\$83 Million	\$75 Million
Less Than 20%	107	\$703 Million	\$562 Million
Less Than 30%	427	\$1.4 Billion	\$980 Million

In 2017, 427 institutions charged taxpayers \$1.4 billion in GI Bill benefits but spent less than 30% of gross tuition on instruction. Assuming GI Bill payments were allocated proportionately with other institutional revenue, \$980 million in taxpayer funds meant for veterans' education were instead spent on non-instructional costs. And 107 of these institutions allocated less than 20% of tuition revenue toward student instruction. These schools charged taxpayers \$703 million in Post-9/11 GI Bill tuition and fee payments in 2017, taking \$562 million for non-instructional expenses.

Our analysis also shows that, of the schools that received Post-9/11 GI Bill funds in 2017 with completion and employment data available, only one in five that allocated less than 20% of gross tuition revenue toward instruction actually graduated more than half of their students and left a majority of students earning above the average high school graduate. Institutions that spent more than 20% of their gross tuition and fees revenue on instruction were twice as likely (41%) to hit these student outcomes benchmarks.

Incredibly, four schools spent less than 10% of their gross tuition revenue on student instruction in 2017, charging taxpayers \$83 million in GI Bill, but taking \$75 million for non-instructional purposes (such as late night TV ads and aggressive call centers that cold call veterans and servicemembers).

Table 6 lists these schools in order of the amount of GI Bill funds received from 2009-2017.

**Table 6: Bottom of the Barrel Schools:**  
Schools that Spent Less Than 10% of Gross Tuition and Fee Revenue on Student Instruction

Institution	Type	Sector	Total GI Bill Tuition and Fees 2009-17	Total GI Bill Tuition and Fees 2017	Percentage of Gross Tuition and Fees Spent on Instruction in 2017
COLORADO TECHNICAL UNIVERSITY	Bachelor's	For-profit	\$284,479,493	\$47,958,628	8.2%
AMERICAN INTERCONTINENTAL UNIVERSITY	Bachelor's	For-profit	\$171,843,483	\$17,046,392	9.4%
CAPELLA UNIVERSITY	Bachelor's	For-profit	\$126,111,055	\$17,656,734	9.4%
ABCO TECHNOLOGY	Certificate	For-profit	\$757,444	\$256,425	6.4%

These four schools, which received more than \$580 million in GI Bill funds from fiscal years 2009-2017, failed to spend at least 10% of their gross tuition on instruction in 2017. Unsurprisingly, only one in four students (26%) who entered these institutions left with a credential in hand, while just a little above half (51%) earned more than a high school graduate after enrolling, making their attendance and use of GI Bill benefits unlikely to result in any sort of financial benefit.<sup>40</sup>

The two bottom of the barrel schools grossing the most GI Bill funds, Colorado Technical University and American Intercontinental University are both owned by Career Education Corporation. Together, they charged taxpayers more than \$65 million in Post-9/11 GI Bill tuition and fees in 2017 alone. According to its 2019 10K annual report filed with the US Securities and Exchange Commission, Career Education Corporation allocated a larger portion of its revenues to either marketing (nearly 23%) or recruiting (14.5%) than it spent on student instruction in 2017, a recipe likely to lead to poor outcomes for the students they enroll.<sup>41</sup> This is the same company that recently paid nearly \$500 million to settle a lawsuit brought by 48 states plus the District of Columbia for fraudulent recruiting and marketing.<sup>42</sup> In other words, assuming its take of \$65 million in GI Bill funds in 2017 alone was allocated in the same way its other revenues were allocated, Career Education Corporation diverted nearly \$60 million in GI Bill funds, in 2017 alone, away from veterans' education and spent more than \$24 million of those GI Bill funds on the very recruiting and marketing that 48 states plus the District of Columbia sued for having deceived and defrauded veterans and other students.

### Conclusion

When taxpayers honor veterans' sacrifice and service with the GI Bill, both the taxpayer and the veteran believe the veteran's hard-earned GI Bill will go towards his or her education, enabling a smooth transition to a successful civilian career. While most colleges are honoring veterans' service, taxpayers' investment, and Congress' intent, many of the colleges taking the most GI Bill funds are instead diverting billions of GI Bill dollars away from veterans' education and instead spending it on TV ads and massive recruiting call centers – much of it deemed predatory by state and federal law enforcement<sup>43</sup> – and to executive compensation many times higher than Harvard's.<sup>44</sup>

Is it time for Congress to ensure the proper use of taxpayer funds and veterans' hard-earned GI Bill? Why were schools that charged taxpayers the largest total amount of GI Bill funds over the past decade allowed to dedicate so little of it to veterans' education and leave most of their students degreeless and earning no more than a high school graduate?

APPENDIX

**Bottom of the Barrel:  
Institutions That Received More Than \$100,000 in Post-9/11 GI Bill Benefits in 2017 and Spent Less Than 20% of Gross Tuition and Fee Revenue on Instructional Spending**

Institution name	Type	Sector	Total GI Bill Tuition and Fees 2009-17	Total GI Bill Tuition and Fees 2017	Percentage of Gross Tuition and Fees Spent on Instruction in 2017
UNIVERSITY OF PHOENIX	Bachelor's	For-profit	\$1,936,128,708	\$192,463,300	15.3%
DEVRY UNIVERSITY	Bachelor's	For-profit	\$776,840,792	\$68,988,234	12.4%
STRAYER UNIVERSITY	Bachelor's	For-profit	\$490,445,709	\$57,056,521	10.9%
COLORADO TECHNICAL UNIVERSITY	Bachelor's	For-profit	\$284,479,493	\$47,958,628	8.2%
LIBERTY UNIVERSITY	Bachelor's	Private, non-profit	\$206,231,358	\$33,189,893	19.0%
ASHFORD UNIVERSITY	Bachelor's	For-profit	\$247,206,406	\$31,093,891	15.6%
SOUTHERN NEW HAMPSHIRE UNIVERSITY	Bachelor's	Private, non-profit	\$101,975,325	\$30,872,296	17.1%
KAPLAN UNIVERSITY	Bachelor's	For-profit	\$202,397,583	\$30,153,987	15.0%
GRAND CANYON UNIVERSITY	Bachelor's	For-profit	\$114,353,931	\$25,685,446	14.7%
CAPELLA UNIVERSITY	Bachelor's	For-profit	\$126,111,055	\$17,656,734	9.4%
AMERICAN INTERCONTINENTAL UNIVERSITY	Bachelor's	For-profit	\$171,843,483	\$17,046,392	9.4%
CHAMBERLAIN COLLEGE OF NURSING	Bachelor's	For-profit	\$60,017,415	\$13,065,541	16.6%
TRIDENT UNIVERSITY INTERNATIONAL	Bachelor's	For-profit	\$57,780,723	\$11,308,126	19.5%
GRANTHAM UNIVERSITY	Bachelor's	For-profit	\$38,278,784	\$9,724,208	15.9%
BRYANT & STRATTON COLLEGE	Associate's	For-profit	\$52,160,985	\$7,630,167	15.2%
STEVENS HENAGER COLLEGE	Associate's	Private, non-profit	\$27,705,586	\$7,619,367	17.7%
COLORADO CHRISTIAN UNIVERSITY	Bachelor's	Private, non-profit	\$27,004,322	\$5,947,072	17.0%
NATIONAL AVIATION ACADEMY	Certificate	For-profit	\$22,119,183	\$5,441,644	19.8%
TULSA WELDING SCHOOL	Certificate	For-profit	\$29,052,117	\$5,269,418	14.5%
NORTHCENTRAL UNIVERSITY	Bachelor's	For-profit	\$30,647,150	\$4,812,051	17.6%
AVIATION INSTITUTE OF MAINTENANCE	Certificate	For-profit	\$13,604,896	\$4,325,505	18.4%
SOUTHWEST UNIVERSITY AT EL PASO	Certificate	For-profit	\$15,880,950	\$4,272,684	18.8%
AVIATION INSTITUTE OF MAINTENANCE	Certificate	For-profit	\$13,833,795	\$4,004,524	13.8%
TIDEWATER TECH	Certificate	For-profit	\$17,135,043	\$3,742,803	19.4%
POST UNIVERSITY	Bachelor's	For-profit	\$15,445,406	\$2,997,576	17.4%
MYCOMPUTERCAREER.COM /TECHSKILLS	Certificate	For-profit	\$2,834,044	\$2,834,044	18.3%
APEX TECHNICAL SCHOOL	Certificate	For-profit	\$13,093,195	\$2,652,093	15.8%
SOUTHERN CALIFORNIA INSTITUTE OF TECHNOLOGY	Certificate	For-profit	\$10,528,393	\$2,570,722	11.3%
INDIANA INSTITUTE OF TECHNOLOGY	Bachelor's	Private, non-profit	\$12,316,603	\$2,486,945	19.8%
UNIVERSITY OF ADVANCING COMPUTER TECHNOLOGY	Bachelor's	For-profit	\$15,924,947	\$2,451,795	19.1%
ULTIMATE MEDICAL ACADEMY	Certificate	Private, non-profit	\$19,575,256	\$2,324,271	17.3%
CARRINGTON COLLEGE	Certificate	For-profit	\$19,231,248	\$2,173,870	19.2%
LAURUS COLLEGE	Certificate	For-profit	\$4,201,823	\$2,036,391	12.4%

ROBERT MORRIS UNIVERSITY ILLINOIS	Bachelor's	Private, non-profit	\$13,755,946	\$1,880,848	17.3%
CONCORDIA UNIVERSITY	Bachelor's	Private, non-profit	\$10,734,323	\$1,733,276	16.9%
REFRIGERATION SCHOOL (THE)	Certificate	For-profit	\$10,380,163	\$1,685,138	12.6%
FAB SCHOOL (THE)	Certificate	For-profit	\$6,602,237	\$1,677,046	13.2%
CARRINGTON COLLEGE	Certificate	For-profit	\$14,249,138	\$1,595,247	18.3%
AVIATION INSTITUTE OF MAINTENANCE	Certificate	For-profit	\$6,107,560	\$1,403,214	19.8%
AVIATION INSTITUTE OF MAINTENANCE	Certificate	For-profit	\$5,196,399	\$1,343,174	15.4%
OCEAN CORPORATION (THE)	Certificate	For-profit	\$10,115,015	\$1,342,486	19.1%
SOUTHERN CAREERS INSTITUTE	Certificate	For-profit	\$6,605,473	\$1,322,231	11.6%
BRIGHTWOOD COLLEGE	Certificate	For-profit	\$8,846,983	\$1,210,427	17.4%
COMMUNITY CARE COLLEGE	Certificate	Private, non-profit	\$1,600,729	\$1,138,717	19.2%
SAE INSTITUTE OF TECHNOLOGY - ATLANTA	Certificate	For-profit	\$2,895,227	\$1,076,807	16.8%
UNIVERSITY OF THE ROCKIES	Graduate-only	For-profit	\$9,763,918	\$1,045,573	17.7%
PINNACLE CAREER INSTITUTE	Certificate	For-profit	\$8,019,959	\$996,131	18.0%
STANBRIDGE UNIVERSITY	Certificate	For-profit	\$3,418,283	\$878,347	12.4%
AVIATION INSTITUTE OF MAINTENANCE	Certificate	For-profit	\$5,120,787	\$868,142	18.9%
AVIATION INSTITUTE OF MAINTENANCE	Certificate	For-profit	\$3,919,408	\$860,775	18.1%
BRIGHTWOOD COLLEGE	Certificate	For-profit	\$5,527,883	\$830,007	17.0%
AMERICAN COLLEGE OF HEALTHCARE SCIENCES	Certificate	For-profit	\$3,949,748	\$823,567	14.2%
PENNCO TECH	Certificate	For-profit	\$3,307,450	\$750,322	14.3%
OTTAWA UNIVERSITY	Bachelor's	Private, non-profit	\$7,942,704	\$667,240	20.0%
BECKER COLLEGE	Bachelor's	Private, non-profit	\$3,896,047	\$639,943	19.3%
SAE INSTITUTE OF TECHNOLOGY	Associate's	For-profit	\$1,770,663	\$633,065	10.4%
EVEREST UNIVERSITY	Associate's	Private, non-profit	\$32,728,862	\$551,539	15.2%
OHIO MEDIA SCHOOL	Certificate	For-profit	\$1,828,518	\$549,818	12.6%
COLLEGEAMERICA - FLAGSTAFF	Associate's	Private, non-profit	\$1,666,365	\$514,216	16.2%
BRYAN UNIVERSITY	Associate's	For-profit	\$2,576,450	\$500,297	14.1%
BRIGHTWOOD COLLEGE	Certificate	For-profit	\$3,274,315	\$495,441	17.8%
WILLIAM PEACE UNIVERSITY	Bachelor's	Private, non-profit	\$2,451,688	\$490,881	17.2%
SAN DIEGO CULINARY INSTITUTE	Certificate	For-profit	\$3,847,385	\$484,645	12.5%
BRIGHTWOOD COLLEGE	Certificate	For-profit	\$2,786,308	\$472,911	18.5%
CORBAN UNIVERSITY	Bachelor's	Private, non-profit	\$2,428,787	\$445,338	15.1%
BRIGHTWOOD COLLEGE	Certificate	For-profit	\$1,943,062	\$443,852	18.4%
THOMAS JEFFERSON SCHOOL OF LAW	Graduate-only	Private, non-profit	\$4,362,992	\$423,723	15.1%
INTERACTIVE COLLEGE OF TECHNOLOGY	Certificate	For-profit	\$1,399,176	\$408,695	19.5%
BRIGHTWOOD COLLEGE	Certificate	For-profit	\$1,426,308	\$389,383	15.6%
MIDLAND UNIVERSITY	Bachelor's	Private, non-profit	\$2,674,149	\$349,312	18.2%
BRIGHTWOOD COLLEGE	Certificate	For-profit	\$1,432,215	\$344,764	17.8%
BEL - REA INSTITUTE OF ANIMAL TECHNOLOGY	Associate's	For-profit	\$3,223,206	\$339,977	15.8%
SAE INSTITUTE OF TECHNOLOGY, LOS ANGELES	Certificate	For-profit	\$2,068,846	\$329,899	17.6%
CROWN COLLEGE	Bachelor's	Private, non-profit	\$1,739,050	\$325,824	17.8%
LOUISIANA CULINARY INSTITUTE	Associate's	For-profit	\$1,492,729	\$324,575	19.3%
NORTHWEST CAREER COLLEGE	Certificate	For-profit	\$981,756	\$324,430	12.4%
SAE INSTITUTE OF TECHNOLOGY - MIAMI	Certificate	For-profit	\$1,482,495	\$302,769	10.0%
QUINCY UNIVERSITY	Bachelor's	Private, non-profit	\$1,980,307	\$300,452	18.9%
BRIGHTWOOD CAREER INSTITUTE	Certificate	For-profit	\$1,777,415	\$292,318	16.1%
BRIGHTWOOD CAREER INSTITUTE	Certificate	For-profit	\$3,089,310	\$290,826	15.2%
PAUL MITCHELL THE SCHOOL-TEMECULA	Certificate	For-profit	\$1,636,709	\$289,716	19.8%
MECH TECH COLLEGE	Certificate	For-profit	\$571,515	\$271,037	19.1%
PENNSYLVANIA GUNSMITH SCHOOL	Certificate	For-profit	\$1,452,499	\$266,980	16.8%
SALEM UNIVERSITY	Associate's	For-profit	\$1,729,260	\$263,914	14.5%
ABCO TECHNOLOGY	Certificate	For-profit	\$757,444	\$256,425	6.4%
ANNA MARIA COLLEGE	Bachelor's	Private, non-profit	\$2,167,249	\$251,430	18.3%
BERK TRADE & BUSINESS SCHOOL	Certificate	For-profit	\$1,073,669	\$247,342	15.6%
HIGH DESERT MEDICAL COLLEGE	Certificate	For-profit	\$698,396	\$243,234	15.3%
NEW ENGLAND COLLEGE OF BUSINESS AND FINANCE	Bachelor's	For-profit	\$600,828	\$241,914	19.9%
GOLDEY-BEACOM COLLEGE	Bachelor's	Private, non-profit	\$2,101,912	\$235,308	12.9%
TONI&GUY HAIRDRESSING ACADEMY	Certificate	For-profit	\$1,391,658	\$232,569	14.0%
AMERICAN SENTINEL UNIVERSITY	Bachelor's	For-profit	\$2,487,013	\$230,906	18.9%
NICHOLS COLLEGE	Bachelor's	Private, non-profit	\$1,003,030	\$205,304	17.3%
FREMONT COLLEGE	Associate's	For-profit	\$1,833,624	\$203,581	18.1%
PACIFIC RIM CHRISTIAN UNIVERSITY	Bachelor's	Private, non-profit	\$778,708	\$203,043	13.2%
ILLINOIS MEDIA SCHOOL	Certificate	For-profit	\$730,236	\$199,293	14.5%
NEUMONT COLLEGE OF COMPUTER SCIENCE	Bachelor's	For-profit	\$1,483,331	\$191,178	18.8%
SUNSTATE ACADEMY	Certificate	For-profit	\$571,131	\$160,790	17.3%
CARRINGTON COLLEGE	Certificate	For-profit	\$2,488,802	\$147,329	11.7%
NORTH-WEST COLLEGE	Certificate	For-profit	\$650,907	\$145,030	18.4%
GWINNETT COLLEGE	Associate's	For-profit	\$910,677	\$134,314	15.9%
FLORIDA BARBER ACADEMY	Certificate	For-profit	\$409,924	\$132,520	18.5%
CALIFORNIA INTERCONTINENTAL UNIVERSITY	Bachelor's	For-profit	\$889,281	\$131,653	15.5%
MEDICAL TRAINING COLLEGE	Certificate	For-profit	\$266,366	\$125,723	19.3%
PCI HEALTH TRAINING CENTER	Certificate	For-profit	\$415,998	\$120,660	18.9%
NEW YORK CONSERVATORY FOR DRAMATIC ARTS (THE)	Associate's	For-profit	\$720,071	\$113,985	18.2%
AMERICAN INSTITUTE	Certificate	For-profit	\$386,654	\$107,925	16.6%

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<sup>1</sup> U.S. Department of Veterans Affairs, “VA Expands Transparency Efforts of Institutions Receiving GI Bill Payments,” March 12, 2018, *available at*: <https://www.va.gov/opa/pressrel/pressrelease.cfm?id=4025>

<sup>2</sup> *See* Veterans Education Success, “Postsecondary Non-Completion Among Veterans: Contributing Factors and Implications” (Nov. 2018), *available at*: <https://static1.squarespace.com/static/556718b2e4b02e470eb1b186/t/5bfd81c1cd8366780d4c1a6c/1543340482077/Final+NCLC+paper+v.+2.0+%283%29.pdf>; *see generally* Student Veterans of America, “National Veteran Education Success Tracker,” *available at*: [https://invest.studentveterans.org/wp-content/uploads/2017/03/NVEST-Report\\_FINAL.pdf](https://invest.studentveterans.org/wp-content/uploads/2017/03/NVEST-Report_FINAL.pdf).

<sup>3</sup> U.S. Department of Health and Human Services, “Rate Review and the 80/20 Rule,” *available at*: <https://www.healthcare.gov/health-care-law-protections/rate-review/>

<sup>4</sup> *See* U.S. Department of Education, “IPEDS Finance Survey,” 2017 provisional data, *available at*: <https://nces.ed.gov/ipeds/use-the-data>. Data for this report was run and analyzed by the Edvisors Group.

<sup>5</sup> Completion outcomes come from the U.S. Department of Education’s Outcome Measure survey, which includes the percentage of full-time, part-time, and transfer-in students who have completed an award or degree at that institution within eight years of entering.

<sup>6</sup> *See* U.S. Department of Education, “College Scorecard Data,” Updated October 30, 2018, *available at*: <https://collegescorecard.ed.gov/data/>; *see also* U.S. Department of Education, “IPEDS Outcome Measure Survey,” 2018, *available at*: <https://nces.ed.gov/ipeds/>

<sup>7</sup> *See* U.S. Department of Veterans Affairs, “VA Expands Transparency Efforts of Institutions Receiving GI Bill Payments,” March 12, 2018, *available at*: <https://www.va.gov/opa/pressrel/pressrelease.cfm?id=4025>. Institutions used in this analysis use a common six-digit identifier — known as the OPEID — that is included within each dataset. Schools that did not receive GI Bill funds or that were not recognized through this identifier within the US Department of Education dataset were excluded from this analysis.

<sup>8</sup> *See* Ann M. Gansemer-Topf and John H. Schuh, “Institutional Selectivity and Institutional Expenditures: Examining Organizational Factors that Contribute to Retention and Graduation. Research in Higher Education, March 21, 2006, *available at*: <https://link.springer.com/article/10.1007/s11162-006-9009-4>.

<sup>9</sup> Amanda Griffith and Kevin N. Rask, “The Effect of Institutional Expenditures on Employment Outcomes and Earnings,” *Economic Inquiry*, Volume 54, Issue 4, August 2016, *available at*: [https://papers.ssrn.com/sol3/papers.cfm?abstract\\_id=2832469](https://papers.ssrn.com/sol3/papers.cfm?abstract_id=2832469).

<sup>10</sup> *See id.*

<sup>11</sup> *See* John J. Cheslock, “Examining Instructional Spending for Accountability and Consumer Information Purposes,” February 28, 2019, *available at*: <https://tcf.org/content/report/examining-instructional-spending-accountability-consumer-information-purposes/>

<sup>12</sup> *See* Cheslock, *supra* note 14.

<sup>13</sup> Note: IPEDS instructs all institutions, regardless of reporting standards, to report GI Bill funds as tuition and fees, rather than discounts and allowances. U.S. Department of Education, “IPEDS Finance Survey Tips Scholarships, Grants, Discounts, and Allowances,” Webpage, *available at*: <https://nces.ed.gov/ipeds/report-your-data/data-tip-sheet-reporting-finance-data#discounts>

<sup>14</sup> *See* U.S. Department of Education, “IPEDS Finance Survey Materials,” January 15, 2016, *available at*: [https://nces.ed.gov/ipeds/surveys/2015/pdf/package\\_5\\_68.pdf](https://nces.ed.gov/ipeds/surveys/2015/pdf/package_5_68.pdf)

<sup>15</sup> *See* U.S. Department of Education, “IPEDS Finance Survey Tips Scholarships, Grants, Discounts, and Allowances.” Webpage, *available at*: <https://nces.ed.gov/ipeds/report-your-data/data-tip-sheet-reporting-finance-data>

<sup>16</sup> *See id.*

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<sup>17</sup> See *id.*

<sup>18</sup> See U.S. Department of Education, "Title IV Volume Reports." Grant Volume 2018, *available at*: <https://studentaid.ed.gov/sa/about/data-center/student/title-iv>

<sup>19</sup> Within our calculation, we do not subtract unrestricted grants from the tuition and fees portion of our calculation. Our reasons for choosing this methodology are such: 1) Due to limitations in IPEDS' finance survey, it is impossible to disaggregate which institutional grants are restricted and which institutional grants are unrestricted for all institutions. Therefore, it is impossible to determine whether institutional grants come from existing institutional funds or new money received by the institutions that year. Also, 2) from a consumer perspective, if students are told they are receiving an institutional scholarship, they should expect a similar amount of that institutional grant or scholarship to go toward actual instruction, similar to any other form of payment. However, we also recognize that this method is limited in that it counts all institutional grants and scholarships as tuition and fees, even though many of them may not be "new" money received by the institution that year. For an analysis that aims to only count outside money received by subtracting unrestricted institutional grants, see John Cheslock's work at the Century Foundation, *available at*: <https://tcf.org/content/report/examining-instructional-spending-accountability-consumer-information-purposes/>

<sup>20</sup> U.S. Department of Education, "IPEDS Outcome Measure Survey," 2018, *available at*: <https://nces.ed.gov/ipeds/>

<sup>21</sup> Gigi Jones, "Expanding Student Success Rates to Reflect Today's College Students," U.S. Department of Education, October 10, 2017, *available at*: <https://nces.ed.gov/blogs/nces/post/expanding-student-success-rates-to-reflect-today-s-college-students>

<sup>22</sup> See generally, Veterans Education Success, "Postsecondary Non-Completion Among Veterans: Contributing Factors and Implications" (Nov. 2018), *available at* <https://static1.squarespace.com/static/556718b2e4b02e470eb1b186/t/5bd0c5b2e2c4838729bed702/1540408755367/NCLC+paper+post-secondary+non-completion.FINAL.pdf>

<sup>23</sup> See U.S. Department of Education, "College Scorecard Data," Updated October 30, 2018, *available at*: <https://collegescorecard.ed.gov/data/>

<sup>24</sup> Institutions that did not match their 6-digit OPEID within the Education Department's Performance by Accreditor database were excluded from this analysis. Furthermore, institutions without outcomes data available were excluded where outcomes data is reported.

<sup>25</sup> Veterans Education Success, Issue Brief #2: "Schools Receiving the Most Post-9/11 GI Bill Tuition and Fee Payments Since 2009," *available at*: <https://static1.squarespace.com/static/556718b2e4b02e470eb1b186/t/5ab2a76b6d2a73a4746063ef/1521657708194/GI+Bill+Cumulative+Revenue+Brief+%232+March2018.FINAL.pdf>

<sup>26</sup> See U.S. Department of Veterans Affairs, "VA Expands Transparency Efforts of Institutions Receiving GI Bill Payments," March 12, 2018, *available at*: <https://www.va.gov/opa/pressrel/pressrelease.cfm?id=4025>

<sup>27</sup> See U.S. Department of Veterans Affairs, "Post-9/11 GI Bill Payment Rates for 2017 Academic Year," *available at*: [https://www.benefits.va.gov/GIBILL/resources/benefits\\_resources/rates/ch33/ch33rates080117.asp](https://www.benefits.va.gov/GIBILL/resources/benefits_resources/rates/ch33/ch33rates080117.asp)

<sup>28</sup> A U.S. Senate Committee report found that the largest for-profit colleges charged VA (and therefore taxpayers) nearly twice as much as public colleges offering the same educational program in the same geographic area. U.S. Senate Committee on Health, Education, Labor and Pensions, "Is the New GI Bill Working? For-Profit Colleges Increasing Veteran Enrollment and Federal Funds" (July 30, 2014), *available at* <https://static1.squarespace.com/static/556718b2e4b02e470eb1b186/t/56100b87e4b0147725a71e86/1443892103628/GI-Bill-data-July-2014-HELP-report.pdf>

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<sup>29</sup> Note: The now-shuttered ITT Tech was the third largest recipient of total post-9/11 GI Bill revenue from 2009 to 2017, when aggregating its many OPEID numbers. In 2014, the last year for which Education Department data is posted, ITT Tech took in almost \$928 million in tuition and fees, but spent only 14 percent (not including discounts) of it on instruction. As a former ITT campus president turned wrote in *Inside Higher Ed*, "The lack of spending on instruction showed in the quality of education offered.

<sup>30</sup> U.S. Department of Education, "IPEDS Finance Survey," 2017 provisional data, *available at*: <https://nces.ed.gov/ipeds/use-the-data>

<sup>31</sup> See Career Education Corporation Form 10K Annual Report to US Securities and Exchange Commission, filed February 20, 2019, *available at* <https://seekingalpha.com/filing/4363324>

<sup>32</sup> See Brian Burnsed, "10 Largest Online Schools," US News (Oct. 14, 2010), *available at*: <https://www.usnews.com/education/online-education/slideshows/10-largest-online-schools?onepage>

<sup>33</sup> See Kevin Carey, "The Creeping Capitalist Takeover of Higher Education," Huffington Post (April 1, 2019), *available at*: <https://www.huffpost.com/highline/article/capitalist-takeover-college/>

<sup>34</sup> See Carla Fried, "What is the Average Student Loan Debt," Experian (June 18, 2018), *available at*: <https://www.experian.com/blogs/ask-experian/what-is-the-average-student-loan-debt/>; see also College Board, "Trends in Higher Education: Tuition and Fees and Room and Board Over Time," *available at*: <https://trends.collegeboard.org/college-pricing/figures-tables/tuition-fees-room-and-board-over-time>

<sup>35</sup> U.S. Council of Economic Advisors, "Investing in Higher Education: Benefits, Challenges, and the State of Student Debt," July 18, 2017. Accessed on March 15, 2017. *Available at*: [https://obamawhitehouse.archives.gov/sites/default/files/page/files/20160718\\_cea\\_student\\_debt.pdf](https://obamawhitehouse.archives.gov/sites/default/files/page/files/20160718_cea_student_debt.pdf).

<sup>36</sup> Note: While institutions included in this section reflect the top 10 GI Bill-grossing schools from 2009-2017, data on instruction, completion, and earnings reflect only one year worth of data.

<sup>37</sup> Kathy Wyer, University of California at Los Angeles, "Survey: More freshman than ever say they go to college to get better jobs, make more money" (Jan. 23, 2013), *available at*: <http://newsroom.ucla.edu/releases/heri-freshman-survey-242619>

<sup>38</sup> Two of these institutions were shown to predominately offer programs that were in the "zone" on the Gainful Employment metrics released in January 2017, suggesting that a majority of former graduates were struggling to earn enough to reasonably pay down their educational debt – Professional Golfers Career College and Swedish Institute. However, more recent data from the Education Department show that these institutions spent more than 50% on students' gross tuition and fees on instruction, and that a majority of their students graduated and earned more than the average high school graduate. According to these metrics, these institutions had better instructional and student outcomes than other for-profit institutions that may provide very similar programs of study.

<sup>39</sup> The amount of GI Bill funds spent on non-instructional activities is calculated as the total amount of GI Bill funds received by the institutions multiplied by the one minus the instructional ratio threshold. For example, for less than 20% on instruction, GI Bill funds spent on non-instructional expenses are calculated as the total amount of GI Bill funds received by those schools (\$541 million) multiplied by  $(1-.20) = \$433$  million of GI Bill funds spent on non-instructional costs. This is a generous estimate, as many schools spend less than the threshold percent on instruction used within each of the calculations.

<sup>40</sup> Completion and Earnings data on Abco Technology was unavailable and, therefore, its outcomes were excluded from this calculation.

<sup>41</sup> Career Education Corporation Form 10K Annual Report to US Securities and Exchange Commission, filed February 20, 2019, *available at* <https://seekingalpha.com/filing/4363324>

<sup>42</sup> Brittany Shoot, "For-Profit College Settlement Erases \$500 Million in Students Debt," Forbes (Jan. 4, 2019,

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*available at:* <http://fortune.com/2019/01/04/career-education-corporation-settlement-college-student-loan-debt-forgiveness/>

<sup>43</sup> See Veterans Education Success, "Law Enforcement Actions Against Predatory Colleges," (updated Feb. 2019), *available at* <https://static1.squarespace.com/static/556718b2e4b02e470eb1b186/t/5c5f5823a4222fa3c7d4c20d/1549752355856/Law+Enforcement+Actions+Ag+Predatory+Colleges.Jan2018.pdf>

<sup>44</sup> See U.S. Senate Committee on Health, Education, Labor and Pensions, "For-Profit Higher Education: The Failure to Safeguard the Federal Investment and Ensure Student Success," (2012) *available at* <https://static1.squarespace.com/static/556718b2e4b02e470eb1b186/t/56100b87e4b0147725a71e86/1443892103628/GI-Bill-data-July-2014-HELP-report.pdf>