Exhibit 21
Education Department Approves $5.8 Billion Group Discharge to Cancel all Remaining Loans for 560,000 Borrowers who Attended Corinthian

Then-Attorney General Kamala Harris's lawsuit against Corinthian played key role in Education Department's work to approve loan discharges for borrowers harmed by Corinthian's wrongdoing

JUNE 1, 2022

Contact: Press Office, (202) 401-1576, press@ed.gov

Today, the U.S. Department of Education (Department) announced it will discharge all remaining federal student loans borrowed to attend any campus owned or operated by Corinthian Colleges Inc. (Corinthian) from its founding in 1995 through its closure in April 2015. This will result in 560,000 borrowers receiving $5.8 billion in full loan discharges. This includes borrowers who have not yet applied for a borrower defense discharge, who will have their Corinthian loans discharged without any additional action on their part. The action is the largest single loan discharge the Department has made in history. Providing this targeted relief is part of the Biden-Harris Administration's continued commitment to helping borrowers who are struggling the most by ensuring discharge programs provide borrowers the complete relief to which they are entitled. Today's action brings the total loan relief the Biden-Harris Administration has approved for borrowers to $25 billion since January 2021.

The announcement today builds upon conclusions first reached by the Department of Education in 2015 that Corinthian engaged in widespread and pervasive misrepresentations related to a borrower's employment prospects, including guarantees they would find a job. Corinthian also made pervasive misstatements to prospective students about the ability to transfer credits and falsified their public job placement rates. Founded in 1995, Corinthian acquired several troubled private for-profit colleges across the country. At its peak in 2010, it enrolled more than 110,000 students at 105 campuses.

Then-California Attorney General Kamala Harris' investigation into Corinthian played a key role in developing findings against the for-profit college chain and the Department's overall work to discharge the loans of borrowers who were harmed by its wrongdoing, a process that has helped cancel the loans of around 100,000 borrowers to date.

"As of today, every student deceived, defrauded, and driven into debt by Corinthian Colleges can rest assured that the Biden-Harris administration has their back and will discharge their federal student loans," said U.S. Secretary of Education Miguel Cardona. "For far too long, Corinthian engaged in the wholesale financial..."
exploitation of students, misleading them into taking on more and more debt to pay for promises they would never keep. While our actions today will relieve Corinthian Colleges’ victims of their burdens, the Department of Education is actively ramping up oversight to better protect today’s students from tactics and make sure that for-profit institutions – and the corporations that own them – never again get away with such abuse."

**Vice President Kamala Harris's History on Holding Corinthian Colleges Accountable**

In 2013, Vice President Kamala Harris sued Corinthian when she was attorney general of California, alleging that the company intentionally misrepresented to its students about job placement rates and was engaging in deceptive and false advertising and recruitment. Then Attorney General Harris' investigation and lawsuit triggered several other inquiries by the Department and other federal and state regulators as well as actions by the Department that ultimately resulted in Corinthian selling most of its campuses in 2014 and closing the remaining ones in 2015.

In 2015, the Department and then-Attorney General Harris released comprehensive findings showing that Corinthian misrepresented job placement rates in programs across the country. Those were the basis of the first borrower defense approvals against Corinthian. It also led the Department to find that the company misrepresented to borrowers who attended its Everest, Heald College, or WyoTech campuses about their ability to find a job using their Corinthian degree. The Department also later found that Corinthian misrepresented students' ability to transfer credits over the same period at all Everest campuses, except the few that had regional accreditation, the WyoTech campus in Laramie, Wyoming, and for borrowers who enrolled in certain programs at Heald campuses in California. In 2016, then-Attorney General Harris and the state of California obtained a more than $1 billion judgment against Corinthian, in which the judge found that the company misrepresented job placement rates, its program offerings, whether students could transfer credits, among many other false or misleading actions.

The Department will soon begin notifying students who attended Corinthian of this decision, with the actual discharges following in the months after. Borrowers will not have to take any actions to receive their discharges.

The Department would like to thank the Consumer Financial Protection Bureau, as well as the Offices of the Attorney General in California, Illinois, Massachusetts, Wisconsin, and 15 others who shared information that informed the Department's findings. The Department also acknowledges the extensive work done by many former Corinthian students to raise attention to the problems at the institution and the need for a process to grant relief for those harmed. Finally, the Department would also like to thank the Federal Student Aid Borrower Defense Group and the Administrative Actions and Appeals Service Group in the Department's Federal Student Aid office and the Department's Office of the General Counsel, for their work on the Corinthian findings.

**Continued Commitment to Targeted Relief**

Today's action is part of the Department's broader goals to ensure better implementation of the student loan programs to get students and borrowers the benefits to which they are entitled, including loan discharges. These goals also include enacting lasting policies to make loans more affordable and prevent a future debt crisis by holding colleges accountable for leaving students with mountains of debt and without good jobs.

Including this group discharge, the Department has now approved $25 billion in loan forgiveness for 1.3 million borrowers. This includes:

- $7.9 billion for 690,000 borrowers whose institutions took advantage of them through discharges related to borrower defense and school closures.
$7.3 billion for more than 127,000 borrowers through Public Service Loan Forgiveness (PSLF).
More than $8.5 billion in total and permanent disability discharges for more than 400,000 borrowers.

The Department also recently announced fixes to long-standing problems in income-driven repayment that will help thousands of borrowers receive forgiveness through that program as well as 40,000 borrowers who receive PSLF.

The Department is also working on new regulations that will permanently improve a variety of the existing student loan relief programs, significantly reduce monthly payments, and provide greater protections for students and taxpayers against unaffordable debts.

**Tags:** Student Financial Aid (/category/subject/student-financial-aid)
Student Loan Programs (/category/subject/student-loan-programs)

**How Do I Find...?**

- Student loans, forgiveness (https://www2.ed.gov/fund/grants-college.html?src=rn)
- College accreditation (https://www.ed.gov/accreditation?src=rn)
- FAFSA (https://fafsa.gov/?src=edgov-rn)
- 1098, tax forms (https://www.ed.gov/1098-e?src=rn)
- More... (https://www2.ed.gov/about/top-tasks.html?src=rn)

**Information About...**

- Transforming Teaching (https://www.ed.gov/teaching?src=rn)
- Early Learning (https://www2.ed.gov/about/edits/earlylearning/index.html?src=rn)

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- May 2022 (/news/press-releases/monthly/202205)
- April 2022 (/news/press-releases/monthly/202204)
- March 2022 (/news/press-releases/monthly/202203)
- February 2022 (/news/press-releases/monthly/202202)
- December 2021 (/news/press-releases/monthly/202112)
Exhibit 22
Approval Rates

The historical data demonstrating the high percentage of approvals among the borrower defense applications processed since 2015 is not representative of the likely adjudication outcomes for most of the 158,000 pending applications. To date, the Department has prioritized one type of claim: job placement rate (JPR) claims asserted by CCI borrowers based on the Department’s explicit findings that CCI had engaged in widespread misrepresentations regarding its job placement rates. JPR claims from CCI borrowers should be viewed differently than all other claims for two reasons:

1) The Department set up a specific, “expedited” process for handling these claims in light of the (correctly) anticipated high volume of applications; and

2) Using data obtained from CCI, the Department performed fairly extensive outreach to borrowers who appeared to be eligible for borrower defense discharges based on the CCI JPR misrepresentations.

Therefore, the CCI JPR applications – using the expedited process with an application specific to CCI JPR claims – require a much shorter period of time to review. All other applications and types of claims are reviewed under a less streamlined process that requires an assessment of evidence.

Further, the approval rates for CCI JPR claims are dramatically higher than we expect to see for all other claims. Because the Department performed outreach to borrowers who were likely to be have successful JPR claims, it is not surprising that many of those borrowers’ applications were, in fact, approved after the borrower applied and their claims were reviewed. The approval rate for CCI JPR applications historically is about 67%.

Our data to date suggests that the approval rate for all other claims will be much lower. For non-JPR applications, the data indicates that the approval rate is likely to be approximately under 10%. We anticipate (based on the limited data available) that the approval rate for other schools with a large volume of applications similarly will be under 10%.

Further, for applications from borrowers who attended schools that have fewer than 20 applications pending, our data to date indicates that the approval rate will be under 5% and may be as low as 2-3%.

As Applied to Pending Claims:

We have approximately 15,000 to 20,000 JPR claims remaining to review and would expect that about 67% of them will be approved unless there is a departure from the percentage applicable to the tens of thousands reviewed to date.

For the other CCI allegations and the “other big schools” buckets, we would expect under 10% approvals.

For the borrowers who attended schools that have fewer than 20 applications pending, our data to date indicates that the approval rate will be under 5% and may be as low as 2-3%.
Exhibit 23
To:         Mark Brown  
           Robin Minor  
From:    Colleen M. Nevin  
CC:       Jeff Appel  
Date:     August 18, 2019  
Re:       Borrower Defense Quality Control Procedures

There are layers of quality control ("QC") built into the borrower defense adjudication process, both at the reviewer level and at the claim level. The QC processes are designed to ensure both that the attorney adjudicators have very low error rates and also that no new type of claim is approved without the involvement of multiple attorneys.

Because of the decision to hire approximately sixty (60) new attorneys that will be comprised of primarily recent law graduates, as discussed below, we are revisiting the percentage of applications that are re-reviewed in the general adjudication quality control process and likely will be adjusting that level to ensure closer scrutiny with respect to the less experienced attorneys.

The various QC aspects of the adjudication process are discussed below:

**Adjudicator Proficiency and Low Error Rates**

The Borrower Defense Unit has proficiency and error rate requirements that must be met. When a new attorney (whether FSA staff or contractor) is onboarded, the attorney goes through a five (5) day introductory training process which includes extensive testing designed to ensure that the attorney understands and is able to follow the BD protocols. After the training, the attorney is on what we refer to as “100% QC” – which means that 100% of the attorney’s adjudications will be reviewed over the course of at least a few days. During that time, the new attorney receives additional one-on-one training until the attorney has achieved a proficiency level with a nearly error-free rate.

When the senior attorney conducting the training is satisfied that the new attorney can be moved “off of 100% QC,” the senior attorney makes that recommendation to the BD Director, and the senior attorney and BD Director meet to review the data on the new attorney’s adjudications. If the BD Director is satisfied, the new attorney is moved into the general quality control category.

The senior attorneys and BD Director periodically review the proficiency and error rates of all attorneys. If an attorney’s error rate increases, additional training may be required. In the past, BD has released contractors whose error rates were unacceptable. If any of the new attorneys or contractors fail to maintain satisfactory error rates after a reasonable period of time, it is expected that we similarly would release those employees or contractors.
General Adjudication Quality Control

From 2016 until the fall of 2018, the BD Unit had a quality control process that required a second level of review (a full re-review by a second attorney) for 20% of all claims and 100% of any new types of claims. In the interest of more efficiently adjudicating claims, in 2018, a decision was made to reduce the QC on all claims to 5%, and the CFO Internal Controls Unit agreed that that level of QC was sufficient.

At the time, all of the attorneys working on BD adjudications – both full-time staff and contractors – were very experienced at BD adjudications and, therefore, the risk of lowering the percentage of claims that received a second look was low. Nevertheless, it is noteworthy that both BD Unit and the Director expressed a preference in maintaining the 20% to ensure that the quality of the decisions was maintained at the level that we expect. While we were overruled then, we now know that there will be many new attorneys adjudicating BD claims, and the likelihood of mistakes is now higher. Therefore, we will be revisiting the quality control percentages and likely, raising them to the previous levels. Alternatively or additionally, we will significantly increase the “spot checking” referenced below based on the seniority and error rates of the attorneys.

New Types of Approvals

The bar for new approvals is high. To date, BD has reviewed and adjudicated applications from over 1,400 schools; only three schools have approvals, and all of the approvals to date are based on existing criteria that were subject to the IG investigation.

The majority of applications will be denied – based on either the insufficiency of the borrower’s allegations or the lack of sufficient evidence to support the borrower’s application. BD has denied thousands of applications from borrowers due to a lack of evidence just in the last several months.

For applications where there is no existing memorandum and protocol (i.e., not Corinthian or ITT), but where there is evidence to support a sufficiently stated claim, those applications will not be approved by the new attorneys on initial review. Rather, if the new attorney reviews an application that is potentially approvable but does not have an existing memorandum and protocol, the new attorney will refer the case to a senior attorney. That attorney will review the evidence from both the borrower and the school (where the school responds) and any findings and evidence from the Department; if the evidence is voluminous, additional attorneys may be assigned to assist. The attorney or group of attorneys then will summarize the evidence, consider the applicable regulation, and decide whether the claim (the new approval type) should be approved.
All new approval types will be reviewed by the senior BD attorneys. If a majority of the senior attorneys and the Director agree that approval is supported by a preponderance of the evidence, the new claim type will be approved; if not, the claim will be denied for insufficient evidence.

OGC will be apprised as new approval types for other (non-CCI and ITT) schools are established. This will allow OGC to assess the applicability of the available methodologies, and where necessary, identify the need for the development of alternative methodologies.

**Additional Review for Some Approvals**

To the extent that a new relief methodology may require reopening borrower applications and data, it is likely that the implementation of the new methodology may also serve as another check on the application decision. This possibility will be revisited when a final approach is determined.

**Spot Checking by BD Director and Sr. Attorneys**

In addition to the training, and the general adjudication QC, the BD Director and senior attorneys periodically do spot checking of the adjudicated applications to ensure that they were decided correctly. (The spot checking is not exclusive to approvals as borrowers previously were advised to file lawsuits if they did not agree with the denial of their applications). Because we will be onboarding a large number of very junior attorneys and law clerks with limited relevant experience, we will be increasing the spot checking to identify any attorneys who require additional training or supervision.
Exhibit 24
"C – Adjudication" Tab Excerpt from Spreadsheet Bates No. DOE00006974
This document is "C – Adjudication" Tab Excerpt from Spreadsheet Bates No. DOE00006974, produced in Native (PDF Converted Page 1 of 2. This notation in red font was added by Plaintiffs for attachment to Supplemental Complaint; not on original.
A senior attorney determines what evidence is relevant and works with a team to review the evidence.

attorney logs into CEMS and pulls up assigned cases

attorney checks file in CEMS to identify correct review protocol

If there is no evidence relevant to a school or categories of borrowers relating to a school, the cases are reviewed under the standard protocol.

attorney reviews case in accordance with protocol

If there is evidence, the senior attorney(s) work with the team to develop an appropriate protocol. For schools or categories with over X cases or where there are potential approvals supported by the evidence, the protocol is reviewed by the Director. If not, it can be approved by a senior attorney. The senior attorney will consult with the Director on any novel or challenging issues.

last step in completed review is to move case into 2.21 (ready for QC) unless reviewer is still in training, in which case the last step is to move the case into 2.22 (QC in progress)

all cases in 2.22 are QC'd and then moved into 2.23 (evidence clearance)

For protocols that set parameters for potential approvals, they must be approved by the Director.

Each night, 2.12 cases are "rolled over." 20% are loaded into 2.22 for QC, and the remainder go into 2.23 (evidence clearance).

after 2.23, if the case is approved, it is moved into 2.31 (awaiting relief determination) for application of the Sec’s relief methodology or a hold status due to litigation, pending policy decisions, etc.

A "final QC" check by a senior team member is performed before the case moves into 3.1 for processing. At this step, the adjudication decision is final.

On reconsideration, the borrower can request reconsideration of the decision (if the case was denied) or relief (if the case was approved). The platform updates needed to address reconsideration requests have not yet been completed. Appropriate protocols will be developed once the platform is updates and pending policy issues are addressed.

This document is "C – Adjudication" Tab Excerpt from Spreadsheet Bates No. DOE00006974, produced in Native (PDF Converted Page 2 of 2. This notation in red font was added by Plaintiffs for attachment to Supplemental Complaint; not on original.
Exhibit 25
UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

THERESA SWEET, CHENELLE ARCHIBALD, DANIEL DEEGAN, SAMUEL HOOD, TRESA APODACA, ALICIA DAVIS, and JESSICA JACOBSON on behalf of themselves and all others similarly situated,

Plaintiffs,

v.

ELISABETH DEVOS, in her official capacity as Secretary of the United States Department of Education,

And

THE UNITED STATES DEPARTMENT OF EDUCATION,

Defendants.

Case No.: 19-cv-03674-WHA

AFFIDAVIT OF ALISON WRIGHT

I, Alison Wright, state as follows:

1. I am submitting this affidavit in relation to the above-captioned case.

2. I borrowed federal student loans in order for my son, John Wright, Jr., to attend the Wyotech Blairsville Diesel Technology and Management program.

3. In December 2015, in order to stop the harassing and threatening phone calls I received from the loan servicer, I refinanced my home to repay the loans in full.

4. On August 5, 2016, I submitted a borrower defense application to the United States Department of Education (“Application”), asking for these loans to be forgiven. A copy of the Application, with personal information redacted, is attached as Exhibit A.

5. My Application included both a letter with supporting evidence that Wyotech engaged in misconduct as well as a signed Attestation Form pertaining to certain Everest and Wyotech students.
6. My son’s initial date of enrollment at Wyotech was August 26, 2011. He re-enrolled on February 13, 2013.

7. On March 30, 2020, I received correspondence from the Department of Education, stating that my claim had been denied (“Denial Notice”). A copy of the Denial Notice is attached as Exhibit B.

8. The Denial Notice says that my Application was denied because my claim was “Outside Coverage Dates” for Job Placement Rates.

9. The Denial Notice says that my Application failed to state a legal claim that Wyotech engaged in misconduct related to Educational Services.

10. The Denial Notice says that my Application failed to state a legal claim that Wyotech engaged in misconduct related to Employment Prospects.

11. The Denial Notice says that my Application failed to state a legal claim that Wyotech engaged in misconduct related to Program Cost and Nature of Loans.

12. The Denial Notice says that my Application failed to state a legal claim that Wyotech engaged in misconduct related to Career Services.

13. The Department’s application form did not ask me to state any legal claims.

14. The Denial Notice stated that my Job Placement Rate claim was “outside coverage dates,” but I do not know what that means. The Department’s application did not state that an initial enrollment date outside the “coverage dates” would result in a denial of that claim, but instead stated that I “may still be eligible for loan forgiveness.” Further, it is now my understanding that my son’s date of re-enrollment was within the coverage dates. And, I included in my Application written evidence regarding the false promises made to my son that influenced both his initial enrollment and his re-enrollment.

15. The Denial Notice does not respond to any of the claims I made or information I provided about Wyotech’s misconduct.

16. The Denial Notice offers no information about whether any of the evidence I submitted was reviewed, let alone considered, or what was found to be deficient. I do not know whether my evidence was reviewed and how it was found deficient.
17. The Denial Notice states that I can apply for reconsideration, but I am not aware of what additional evidence would be helpful, and based on the content of the Denial Notice, I do not know if the Department would review any additional evidence.

I swear under penalty of perjury that the foregoing is true and correct.

Executed on: August 20__, 2020

__________________________
Alison Wright
EXHIBIT A
The Department of Education has found that at various times between 2010 and 2014, Everest Institute, Everest College, and Everest University ("Everest"), and WyoTech published misleading job placement rates for many of its programs of study. This form is designed to expedite the process of obtaining loan forgiveness based on borrower defense to repayment for loans taken out by Everest and WyoTech students to enroll in these programs. This form covers federal Direct Loans (including Parent PLUS loans issued to parents of Everest and WyoTech students) received on or after July 1, 2010. A list of covered programs and dates of enrollment is available at https://studentaid.ed.gov/de/y-wy-findings. Please fill out this attestation ONLY IF your program and dates of enrollment are included on this list.

Everest and WyoTech students who did not attend programs where the Department of Education found misleading job placement rates, or whose decision to enroll was not influenced by those job placement rates, may still be eligible for loan forgiveness based on borrower defense to repayment. Additional instructions to file a claim for loan forgiveness can be found at https://studentaid.ed.gov/de/repay-loans/forgiveness-cancellation/borrower-defense.

Instructions: Please complete this form. To sign the form, insert a digital image of your signature in the appropriate field below or print a hard copy of the form and sign. Submit your form and all supplementary documents referenced in question #4 via email to FSAOperations@ed.gov or mail to Department of Education, PO Box 194407, San Francisco, CA 94119.

### SECTION I: BORROWER INFORMATION

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<tr>
<th>First Name</th>
<th>Middle Name</th>
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<th>Date of Birth</th>
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<tr>
<td>Alison</td>
<td>E</td>
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<th>Home Address</th>
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<th>Zipcode</th>
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I, **Alison Wright**, attest to the following:

I am submitting this attestation and additional materials in support of my application for a borrower defense to repayment discharge of my Direct Loans under 34 C.F.R. § 685.206 (c).

### SECTION II: PROGRAM INFORMATION

If you enrolled in more than one covered Everest/WyoTech program, you will need to complete the following for each covered program you attended. For example, if you were a criminal justice student in 2011 and returned in 2012 for an accounting program, you should complete the first Campus Program section based on your enrollment in criminal justice and the second Campus Program section based on your enrollment in accounting.

If you have more than one program, click the Add Campus Program button that appears at the bottom of the Campus Program section.

Note: This form applies to students who enrolled in a program after misleading placement rates were published for the program. A list of covered programs and dates of enrollment is available at https://studentaid.ed.gov/de/y-wy-findings. The earliest enrollment date covered is July 1, 2010.
1. Prior to my enrollment in this Everest/WyoTech program, I received information about job placement rates related to my program of study through one or more of the following ways (check each that applies)

☐ Brochures advertising Everest/WyoTech academic programs or other printed materials, including those provided by Everest/WyoTech representatives or recruiters;

☐ Emails, online materials, or online disclosures from or by Everest/WyoTech.

2. I believed that the job placement rates related to my program of study indicated the level of quality an Everest/WyoTech education offered to students. I chose to enroll at Everest/WyoTech based, in substantial part, on the information I received about job placement rates related to my program of study and the quality of education I believed those placement rates represented.

3. I applied for and received a federal Direct Loan to cover the cost of attendance of the Everest/WyoTech program in which I enrolled.

4. As an attachment to this attestation, I have included documents(s) with additional information to confirm that I was enrolled in the program of study at Everest/WyoTech that I identified above, and was enrolled for the dates I provided above. (Suggested documents include transcripts and registration documents indicating your specific program of study at Everest/WyoTech and dates of enrollment.) The document(s) I have attached are:


*Select the check box if you had multiple periods of enrollment in a program, that is, if you enrolled in a program but subsequently discontinued enrollment, and then reenrolled in the same program at a later date, please provide all start and end dates applicable to this program. (Deselect the check box to remove any enrollment dates added in error.)

SECTION III: OTHER INFORMATION

Please provide or attach any other information about your experience at Everest/WyoTech that you believe is relevant: (2,000 characters max)

Due to the frequent harassing/threatening phone calls regarding this school loan, I refinanced my home to attain money to pay the loan off. This loan was paid in full 12-26-2014 to Great Lakes Confirmation # 36,802.98
SECTION IV: DIRECT LOAN FORBEARANCE

By completing this form, you are eligible to have all of your federal loans placed into forbearance and for collections on any federal loans in default to stop while your claim is reviewed by the Department of Education. Please read the following information carefully before making your selection below.

During any period that your loans are in forbearance, you do not have to make payments on those loans, and the loans will not go into default. If your loans are already in default, collections will stop. This will continue until the loan discharge review process is completed. Your servicer will notify you when your loan has been placed into forbearance or stopped collections. **Until you receive that notice, you should continue to make payments.**

The forbearance or stopped collections will affect all of a borrower’s federal loans, including loans that are not eligible for discharge through this form, such as Federal Family Education Loans (FFEL), loans taken out to attend an Everest and/or WyoTech program not on the enclosed list of covered programs, or loans taken out to attend another institution.

**Note that interest will continue to accrue on all of these federal loans, including subsidized loans, during the forbearance or stopped collections period.**

If you want the forbearance or stopped collections to apply only to those loans that may be eligible for a discharge using this form (federal Direct Loans received on or after July 1, 2010 to attend Everest and/or WyoTech programs covered by the enclosed list), you must notify your loan servicer. **At any time during the forbearance or stopped collections period, you may voluntarily make payments on your loans, including payments for accrued interest, or end the forbearance or stopped collections by contacting your servicer.**

If your claim made using this form is successful, your federal Direct Loans borrowed to attend a covered Everest/WyoTech program will be discharged. Also at that time, the forbearance or stopped collections period for your other federal loans will end. You will be responsible for repaying these other remaining loans, including interest that accrued during the forbearance or stopped collections period, under the terms of your promissory note.

If your claim is denied, you will not receive a discharge of any of your loans and the forbearance or stopped collections period will end for all of your loans. You will be responsible for repaying these loans, including interest that accrued during the forbearance or stopped collections period, under the terms of your promissory note.

- **Loan has been paid in full!**
- Yes, I want my federal loans to be placed in forbearance and for collections to stop on any loans in default while my loan discharge claim is reviewed.
- No, I do not want my federal loans to be placed in forbearance and for collections to stop on any loans in default while my loan discharge claim is reviewed.

SECTION V: CERTIFICATION

By signing this attestation I certify that:

I agree to provide, upon request, testimony, a sworn statement, or other documentation reasonably available to me that demonstrates to the satisfaction of the Department of Education or its designee that I meet the qualifications for borrower defense to repayment loan discharge.

All of the information I provided is true and complete to the best of my knowledge and I agree, if asked, to provide information reasonably available to me to the Department of Education that will verify the accuracy of my completed attestation.

I understand that the Department of Education has the authority to verify information reported on this application with other federal or state agencies or other entities. I authorize the Department of Education, along with its agents and contractors, to contact me regarding this request at the phone number above using automated dialing equipment or artificial or prerecorded voice or text messages.

I understand that if I purposely provided false or misleading information on this application, I may be subject to the penalties specified in 18 U.S. Code § 1001.

Signature ___________________________ Date 7-11-2016
Privacy Act Notice. The Privacy Act of 1974 (5 U.S.C. 552a) requires that the following notice be provided to you: The authorities for collecting the requested information from and about you are §421 et seq., §451 et seq. and §461 et seq. of the Higher Education Act of 1965, as amended (20 U.S.C. 1071 et seq., 20 U.S.C. 1087(a) et seq., and 20 U.S.C. 1087(a) et seq., and the authorities for collecting and using your Social Security Number (SSN) are §428B(f) and §484(a)(4) of the HEA (20 U.S.C. 1078-2(f) and 20 U.S.C. 1091(a)(4) and 31 U.S.C. 7701(b). Participating in the William D. Ford Federal Direct Loan (Direct Loan) Program, the Federal Family Education Loan (FFEL) Program, or the Federal Perkins Loan (Perkins Loan) Program, and giving us your SSN are voluntary, but you must provide the requested information, including your SSN, to participate. The principal purposes for collecting the information on this form, including your SSN, are to verify your identity, to determine your eligibility to receive a loan or a benefit on a loan (such as a deferment, forbearance, discharge, or forgiveness) under the Direct Loan Program, FFEL, or Perkins Loan Programs, to permit the servicing of your loan(s), and, if it becomes necessary, to locate you and to collect and report on your loan(s) if your loan(s) becomes delinquent or defaults. We also use your SSN as an account identifier and to permit you to access your account information electronically. The information in your file may be disclosed, on a case-by-case basis or under a computer matching program, to third parties as authorized under routine uses in the appropriate systems of records notices. The routine uses of this information include, but are not limited to, its disclosure to federal, state, or local agencies, to private parties such as relatives, present and former employers, business and personal associates, to consumer reporting agencies, to financial and educational institutions, and to guaranty agencies in order to verify your identity, to determine your eligibility to receive a loan or a benefit on a loan, to permit the servicing or collection of your loan(s), to enforce the terms of the loan(s), to investigate possible fraud and to verify compliance with federal student financial aid program regulations, or to locate you if you become delinquent in your loan payments or if you default. To provide default rate calculations, disclosures may be made to guaranty agencies, to financial and educational institutions, or to state agencies. To provide financial aid history information, disclosures may be made to educational institutions. To assist program administrators with tracking refunds and cancellations, disclosures may be made to guaranty agencies, to financial and educational institutions, or to federal or state agencies. To provide a standardized method for educational institutions to efficiently submit student enrollment statuses, disclosures may be made to guaranty agencies or to financial and educational institutions. To counsel you in repayment efforts, disclosures may be made to guaranty agencies, to financial and educational institutions, or to federal, state, or local agencies. In the event of litigation, we may send records to the Department of Justice, a court, adjudicative body, counsel, party, or witness if the disclosure is relevant and necessary to the litigation. If this information, either alone or with other information, indicates a potential violation of law, we may send it to the appropriate authority for action. We may send information to members of Congress if you ask them to help you with federal student aid questions. In circumstances involving employment complaints, grievances, or disciplinary actions, we may disclose relevant records to adjudicate or investigate the issues. If provided for by a collective bargaining agreement, we may disclose records to a labor organization recognized under 5 U.S.C. Chapter 71. Disclosures may be made to our contractors for the purpose of performing any programmatic function that requires disclosure of records. Before making any such disclosure, we will require the contractor to maintain Privacy Act safeguards. Disclosures may also be made to qualified researchers under Privacy Act safeguards.

Paperwork Reduction Act Notice. According to the Paperwork Reduction Act of 1995, no persons are required to respond to a collection of information unless such collection displays a valid OMB control number. The valid OMB control number for this information collection is 1845-0132. Public reporting burden for this collection of information is estimated to average 1 hour per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. The obligation to respond to this collection is required to obtain or retain a benefit (20 U.S.C. 1087c(b)). If you have comments or concerns regarding the status of your individual submission of this application, please contact FSAOperations@ed.gov.
Alison Wright

August 5, 2016

Department of Education

P.O. Box 194407

San Francisco, CA 94119

Regarding a letter I received about Direct Plus Loans recommended to Me from the School – Wyotec in Blairsville, PA, I have enclosed copies of documents I feel are relevant to this experience, and my request for Loan forgiveness or actually, refund.

I am an RN employed by this region’s Medical Center. My Husband is a Commercial Carpenter. We have worked for and paid for everything we have. Our oldest son thought Wyotec’s Diesel Mechanic program would be a positive direction for his educational future and it was sold to us as that, as you may see on the enclosed 2010 Annual Placement Disclosure.

As you are already aware, this was a horrible experience for my son. The teachers in this school exhibited neglectful behavior and my son suffered a terrible depression and was asked to leave the school. He returned home explaining that the school was a horrible scam. My husband and I teach our children to finish what they start, and recommended him to return and finish the program in hopes of him having a career at completion. He finished and absolutely could not find a company that would hire him – Wyotec did not provide him with any accreditations.

Because of the high interest rate (7.9%) and the harassing phone calls, we refinanced our home and paid off the total of the loan = $36,802.98, as you may see in the enclosed papers. I called for a paid in full letter or receipt, but never received one. The proof of payment from our bank account is enclosed.

If the Education Department is providing other students like my son with Loan forgiveness, I am requesting a refund in the same amount that others are receiving in forgiveness.

Thank you for your sincere work in this matter,

Alison E Wright
Wyotech

Enrollment Agreement

1. STUDENT APPLICANT

Last Name: John
First Name: Jon
Middle Initial: K
Address: 123 Main St, Anytown, USA
City: Anytown
State: CA
Zip: 12345
Tel. No.: 555-1234

2. EDUCATION PROGRAM

Program: Automotive Technology
Program Code: 12345
Academic Award: Certificate
Certificate of Completion
Diploma
Occupational AS Degree
Total Program Cost

3. Tuition and Fees

Tuition is charged by academic year.

<table>
<thead>
<tr>
<th>First Academic Year</th>
<th>Second Academic Year</th>
<th>Third Academic Year</th>
<th>Total Program Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>$5,000</td>
<td>$7,500</td>
<td>$9,000</td>
<td>$25,500</td>
</tr>
</tbody>
</table>

Tuition is payable on the first day of each class of the academic year. The application fee is payable upon enrollment. You are responsible for this amount. If you get a student loan, you are responsible for repaying the loan amount plus any interest.

4. Books, Tools, and Fees: Books and a set of tools will be provided (loaned) to the Laramie, Blairsville, and Sacramento students at no additional charge. Resident students must pay a $100.00 tool and tool deposit upon registration for the first academic year. The deposit will be returned within 30 days of student separation from school, provided all books and tools are returned in the same condition as received less normal wear. The cost of lost or damaged books and tools will be deducted from the deposit. If the losses or damages exceed the deposit, the student must pay the difference prior to separation from school. Charges for books at the Fremont and Daytona Beach campuses are included in tuition. Tools and equipment will be provided (loaned) to Fremont and Daytona Beach students at no additional charge. Online students for the Fremont campus must pay a $100.00 non-refundable online fee at the beginning of each six-week phase of the online portion of training. Students at the Laramie, Blairsville, Sacramento, and Daytona Beach campuses will be charged a $750.00 Materials Fee for diploma programs. Students at the Laramie and Blairsville campuses will be charged a $1,500.00 Technology Fee for degree programs. Students at the Sacramento campus will be charged a $1,500.00 Technology Fee for degree and Certificate/Refueling programs. Students at the Sacramento campus will be charged a $500.00 Materials Fee for the Automotive Technician program. Students at the Fremont campus will be charged a $500.00 Technology Fee for the Automotive Technician program. Students at the Fremont campus taking a refresher course will be charged $275.00 and a $200.00 Training Materials Fee.

5. The Student Applicant Understands

(a) The school does not guarantee employment following graduation, but does offer placement assistance to graduates. To obtain maximum employment opportunities the student may be required to relocate outside of their campus' location upon successful completion of the program.
(b) The total program cost indicated in section 3 of this agreement does not include housing charges.
(c) The school reserves the right to change class schedules, change or eliminate sessions, revise or withdraw programs, and make other changes in training-related matters at any time; provided in no event will this alter the duration of the course/program nor the cost. These changes may occur for Illinois students with approval from the Illinois State Board of Education.
(d) The terms and conditions of this agreement are not subject to amendment or modification by oral agreement. Any changes in this agreement are not binding on the student or the school unless such changes have been approved in writing by the authorized official of the school, the student, or the student's parent/guardian if the student is a minor.
(e) The school is not responsible for any statements, promises or agreements contrary to this agreement or the school catalog.
(f) The school reserves the right to discontinue a student's training for lack of satisfactory academic progress, non-payment of tuition or fees, or failure to comply with published rules of conduct.
(g) Full-time assistance will be requested, neither the amount of assistance nor a payment schedule for remaining unpaid charges can be determined at this time. When the amount of financial assistance has been determined, a separate installment Contract shall be executed. In compliance with federal and state laws, the Installment Contract will disclose the school charges not satisfied by financial assistance, and indicate a payment schedule for the remaining unpaid charges.
(h) The tuition indicated in this agreement is applicable through the indicated graduation date, provided the student remains in continuous classroom attendance through that date, except for regularly scheduled school breaks.
(i) The date of this transaction is the date this agreement is signed by the student applicant. The date of execution of this transaction for Illinois students is the postmark date of the letter of acceptance from the school.
(j) Wyotech does not guarantee credit transfer in or out of the school. Transferability is always at the discretion of the receiving school. The degree, diploma, and certificate programs of the school are terminal in nature and are designed for the graduate's employment upon graduation.

BUYER'S RIGHT TO CANCEL

You, the buyer, may cancel at any time after signing this Agreement and within five business days following the day of the first class of the first academic year. See the attached Notice of Cancellation form for an explanation of this right.

NOTICE TO ALL SIGNATORIES: (1) Do not sign this Agreement before reading it, including the writing on the reverse side or if it contains any blank spaces. (2) Both sides of this Agreement are legally binding when signed by the student applicant and accepted in writing at Wyotech. (3) It is unfair business practice for the school to sell, discount, or otherwise transfer this contract or any promotional note without the written consent of the student or his/her financial sponsors and a written statement notifying all parties that the cancellation and refund policy continues to apply. (4) You acknowledge receipt of and have had the opportunity to review an exact copy of this Agreement, a Notice of Cancellation form, a school catalog including the definition and implications of the transferability of credit policy, and any information disclosure pages presented by the school. (5) You have been given the opportunity to tour the facilities.

My signature below certifies I read, understood, and agreed to my rights and responsibilities, and the school's cancellation and refund policies have been clearly explained to me.

As an authorized representative of the school, I have interviewed the student applicant and I recommend his/her acceptance. I have not made any statements or promises contrary to the terms of this agreement or the school catalog. I have complied with the Illinois Act and Code. Payment of the Application Fee (if applicable) and/or Tuition Deposit by the student applicant is acknowledged.

Wyotech

READ REVERSE SIDE FOR ADDITIONAL TERMS AND CONDITIONS

PAGE 1 OF 2

White-Admissions, Yellow-StudentAcceptance, Pink-Student/Home
Recruiter

Chad Saddlemire
518-375-9931

WYOTech Campus Locations
Blaisville, PA • Daytona, FL • Fremont, CA
Laramie, WY • Long Beach, CA • Sacramento, CA
Member of the Corinthian Colleges, Inc. Global Network
WyoTech, Blairsville is accredited by the Accrediting Commission of Career Schools and Colleges (ACCSC) and as such annually prepares and submits an Annual Report. The following are the most recent placement statistics submitted to ACCSC.

<table>
<thead>
<tr>
<th>Applied Services Management</th>
<th>Placement</th>
</tr>
</thead>
<tbody>
<tr>
<td>Motorsports Chas Fab w/ Auto</td>
<td>89%</td>
</tr>
<tr>
<td>Motorsports Chas Fab w/ Coll</td>
<td>92%</td>
</tr>
<tr>
<td>Motorsports Chas Fab w/ Diesel</td>
<td>86%</td>
</tr>
<tr>
<td>Street Rod w/ Auto Tech</td>
<td>82%</td>
</tr>
<tr>
<td>Street Rod w/ Coll. Ref.</td>
<td>85%</td>
</tr>
<tr>
<td>Street Rod w/ Diesel</td>
<td>77%</td>
</tr>
<tr>
<td>Col. Ref. w/ Uphol. Tech</td>
<td>77%</td>
</tr>
<tr>
<td>Auto Tech w/ Light Duty Diesel</td>
<td>88%</td>
</tr>
<tr>
<td>AST Auto Tech &amp; Mgmt</td>
<td>83%</td>
</tr>
<tr>
<td>AST Col. Ref. Tech &amp; Mgmt</td>
<td>86%</td>
</tr>
<tr>
<td>AST Diesel &amp; Mgmt</td>
<td>100%</td>
</tr>
<tr>
<td>Auto Tech w/ High Perf Power Trains</td>
<td>83%</td>
</tr>
<tr>
<td>Auto/Diesel Vehicle Technology</td>
<td>73%</td>
</tr>
<tr>
<td>Auto Tech w/ Trim &amp; Upholstery</td>
<td>N/A</td>
</tr>
<tr>
<td>Diesel Technician</td>
<td>100%</td>
</tr>
<tr>
<td>Diesel w/ High Perf Power Trains</td>
<td>85%</td>
</tr>
<tr>
<td>Diesel w/ Light Duty Diesel</td>
<td>95%</td>
</tr>
<tr>
<td>Diesel/Auto Vehicle Technology</td>
<td>78%</td>
</tr>
</tbody>
</table>

ACCSC outcomes are calculated by program length, tracking start cohorts from their start date through graduation. To determine the cohort date range, the ACCSC calculation counts backwards from the report date as follows: program length times 1.5 plus 3 months for placement activity. Employment is calculated by taking the total graduates placed in field divided by the total number of graduates minus graduates waived for employment because of continuing education, military, health, incarceration, foreign students or death.

School 6 hrs/day
Homework = reading 2 chapters

2010 Annual Retention Disclosure

The retention rates are calculated by taking the full-time, first-time cohort of students who enrolled between October 13, 2008 through November 30, 2008 and then looking at the student status as of that cohort during the school yr.
ACCOUNT STATEMENT

For your convenience,
we now offer gift cards for all occasions.
Stop by any branch to make your purchase.

Super Now  6855

<table>
<thead>
<tr>
<th>Description</th>
<th>Deposits and other additions</th>
<th>Checks paid and other subtractions</th>
<th>Balance</th>
</tr>
</thead>
<tbody>
<tr>
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<td></td>
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<td></td>
<td>45,611.31</td>
</tr>
<tr>
<td>12-29-14 GREATLAKES STUDENT LN 6KCEO1391K1</td>
<td>36,802.98</td>
<td></td>
<td>8,808.33</td>
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<td>12-30-14 246684 POS PURCHASE PGI*PYRAMID COLL 877-7561628 MA 86455520 246684</td>
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<td>8,738.38</td>
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<td>9,363.38</td>
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<td>12-31-14 ORANGE REGIONAL PR PAYMENT 0001-002000140</td>
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<td></td>
<td>11,577.59</td>
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<td>11,527.59</td>
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<td>11,477.59</td>
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<td></td>
<td>11,377.59</td>
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<td>25.93</td>
<td></td>
<td>11,330.56</td>
</tr>
</tbody>
</table>
Hi Alison E. Wright,

The number you’ve been waiting for is here—**your 1098-E is now available.** You can find the number for this account on the back of this letter, or by logging into mygreatlakes.org.

Your number is the amount of interest paid on your Great Lakes-serviced student loans in 2014. You’ll have one number for each account listed in your Account Summary on mygreatlakes.org. You may be able to deduct some or all of the amounts from your income on your federal tax return, which could reduce the amount you pay—good news for you!

If you have student loans with other lenders or servicers, they’ll provide you with the interest paid on those loans. Add all of your numbers together to determine the total student loan interest paid for the year. Check with a tax advisor to determine which interest is tax deductible, and provide that amount in box 1 in the student loan interest deduction portion of your tax return.

Find more information on the 1098-E by visiting mygreatlakes.org/go/taxstatements.

Sincerely,

Great Lakes Borrower Services
Your Great Lakes ID: [redacted]

**U.S. Department of Education Privacy Policy**

In 1999, Congress enacted the Gramm-Leach-Bliley Act (Public Law 106-102). This Act requires that lenders provide certain information to their customers regarding the collection and use of nonpublic personal information. Because you have a loan held by the U.S. Department of Education, we are sending you this Notice.

In general, the categories of nonpublic personal information collected about you from your application, your educational institution, and consumer reporting agencies, include your address and other contact information, demographic background, loan and educational status, family income, social security number, employment information, collection and repayment history, and credit history. We disclose nonpublic personal information to third parties as necessary to process and service your loan and as permitted by the Privacy Act of 1974. The Privacy Act permits disclosure to third parties as authorized under certain routine uses. Examples of disclosures permitted under the Privacy Act include disclosure to federal and state agencies, private parties such as relatives, present and former employers, and creditors, and our contractors for purposes of administration of the student financial assistance programs, for enforcement purposes, for litigation, and for use in connection with audits or other investigations.

We do not sell or otherwise make available any information about you to any third parties for marketing purposes. We protect the security and confidentiality of nonpublic personal information by implementing the following policies and practices. All physical access to the sites where nonpublic personal information is maintained is controlled and monitored by security personnel. Our computer systems offer a high degree of resistance to tampering and circumvention. These systems limit data access to our staff and contract staff on a need-to-know basis and control individual users' ability to access and alter records within the systems. All users of these systems are given a unique user ID with personal identifiers. All interactions by individual users with the systems are recorded.

---

GREAT LAKES EDUCATIONAL LOAN SERVICES, INC.
MYGREATLAKES.ORG

#001155 0112015 796591 FIN
Form 1098-E  
(keep for your records)  
www.irs.gov/form1098e  Department of the Treasury - Internal Revenue Service

**Title:** Student Loan Interest Statement

**Copy B For Borrower**  
This is important tax information and is being furnished to the Internal Revenue Service. If you are required to file a return, a negligence penalty or other sanction may be imposed on you if the IRS determines that an underpayment of tax results because you overstated a deduction for student loan interest.

**Instructions for Borrower**  
A person (including a financial institution, a governmental unit, and an educational institution) that receives interest payments of $600 or more during the year on one or more qualified student loans must furnish this statement to you.

You may be able to deduct student loan interest that you actually paid in 2014 on your income tax return. However, you may not be able to deduct the full amount of interest reported on this statement. Do not contact the recipient/lender for explanations of the requirements for (and how to figure) any allowable deduction for the interest paid. Instead, for more information, see Pub. 970, Tax Benefits for Education, and the Student Loan Interest Deduction Worksheet in your Form 1040 or 1040A instructions.

**Borrower's identification number.** For your protection, this form may show only the last four digits of your social security number (SSN), individual taxpayer identification number (ITIN), or adoption taxpayer identification number (ATIN). However, the issuer has reported your complete identification number to the IRS and, where applicable, to state and/or local governments.

**Account number.** May show an account or other unique number the lender assigned to distinguish your account.

**Box 1.** Shows the interest received by the lender during the year on one or more student loans made to you. For loans made on or after September 1, 2004, box 1 must include loan origination fees and capitalized interest received in 2014. If your loan was made before September 1, 2004, you may be able to deduct loan origination fees and capitalized interest not reported in box 1.

**Box 2.** If checked, indicates that loan origination fees and/or capitalized interest are not included in box 1 for loans made before September 1, 2004. See Pub. 970 for how to figure any deductible loan origination fees or capitalized interest.

**Future developments.** For the latest information about developments related to Form 1098-E and its instructions, such as legislation enacted after they were published, go to www.irs.gov/form1098e.
November 19, 2014

Hi Alison,

I’m reaching out because I had a chance to look at your financial situation and I think you’re headed down the wrong path with your student loans. But it’s not too late to change course.

If you can, please make a payment equal to the past due amount on the back of this letter. If you’re unable to, let’s work together to find a solution. Here are some options:

- Change to a repayment plan based on your income. It could reduce your monthly payment to as low as $0.
- Postpone your payments with a deferment or forbearance and resolve your past due payments.
- Explore loan forgiveness.
- Consider loan consolidation.

For additional information, read the enclosed Know Your Repayment Options or call us.

Doing Nothing Only Makes It Worse

Your delinquent loans may have already been reported to national credit bureaus. If you don’t take action and the loans default, the default will be reported to all national credit bureaus and your defaulted loans will be transferred to either the loan guarantor or the U.S. Department of Education for collection. Collection action may include garnishing your wages, seizing tax refunds and other payments made by the government, and legal action to collect the loans.

Give us a call and let us help you get on the right path.

Sincerely,

Great Lakes Borrower Services
## A Snapshot of Your Great Lakes-Serviced Student Loan Accounts as of 11/19/2014

<table>
<thead>
<tr>
<th>Loan Type</th>
<th>Lender</th>
<th>Principal Balance and Interest Rate</th>
<th>Accrued Interest</th>
<th>Account Balance</th>
<th>Next Payment Due Date</th>
<th>Amount</th>
<th>Past Due Days</th>
<th>Past Due Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>Parent PLUS</td>
<td>U.S. DEPARTMENT OF EDUCATION (798581)</td>
<td>$0</td>
<td>$984.45</td>
<td>$36,518.39</td>
<td>12/16/2014</td>
<td>$444.36</td>
<td>95</td>
<td>$1,777.44</td>
</tr>
</tbody>
</table>

**Accounts Referenced in this Letter**

- **Total Balance:** $36,518.39
- **Total Past Due Amount:** $1,777.44

---

**Loan Type**
The type of student loan you borrowed.

**Lender**
The organization that loaned you money for school, such as banks, credit unions, or the U.S. Department of Education.

**Principal Balance and Interest Rate**
The amount of money you borrowed for school and the interest rate, minus any principal payments or refunds received.

**Subsidized**
This amount doesn't build up interest during certain statuses because the federal government pays it for you, unless you reach the 150% subsidy limit and lose the government subsidy.

**Unsubsidized**
This amount always builds up interest.

**Accrued Interest**
The amount of interest that has built up so far.

**Account Balance**
The principal balance plus the interest that's built up so far. Keep in mind, this is not your payoff amount.

**Next Payment Due Date and Amount**
The date your next payment and amount is due.

**Past Due Days and Amount**
The number of days and the amount your account is past due.
<table>
<thead>
<tr>
<th>PAYMENT DATE</th>
<th>PMT TYPE</th>
<th>AMOUNT</th>
<th>APPLIED TO PRINCIPAL</th>
<th>APPLIED TO INTEREST</th>
<th>APPLIED TO LATE CHRGs</th>
<th>UNPAID BALANCE</th>
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</thead>
<tbody>
<tr>
<td>09/26/2011</td>
<td>ND</td>
<td>9,358.00</td>
<td></td>
<td></td>
<td></td>
<td>9,358.00</td>
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<tr>
<td>03/23/2012</td>
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<td>22,465.00</td>
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<td>04/30/2012</td>
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<td>06/21/2012</td>
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<td>610.77</td>
<td></td>
<td></td>
<td></td>
<td>24,411.77</td>
</tr>
</tbody>
</table>
Dear Alison E. Wright:

Your May 2, 2014 billing statement is now available on mygreatlakes.org. Your statement keeps you informed about your account balance, and details how any recent payments were applied.

<table>
<thead>
<tr>
<th>Payment for All Accounts:</th>
<th>$888.72</th>
</tr>
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Pay online at mygreatlakes.org. Consider enrolling in Auto Pay.

To view your full statement, visit mygreatlakes.org.

This communication seeks to collect a debt and any information we receive will be used for this purpose. Please make a payment today.

Sincerely,

Great Lakes Borrower Services

Great Lakes ID: [Redacted]

Unemployed? Underemployed? Need Relief?

Troubled by unemployment, a low salary, or not enough hours at work? Lower or postpone your student loan payments and help lighten your load. The availability of other plans depends on your loan type, when you borrowed money, and the amount of time left in repayment. Learn more at www.mygreatlakes.org/go/unemploymentrelief or contact us. Visit mygreatlakes.org or call us at (800) 236-4300 or (508) 246-1700. TTY users call 711. You can also write to us at Great Lakes, PO Box 7860, Madison, WI 53707-7860. Some calls may be monitored or recorded for quality assurance purposes.

The Department of Education's website, studentaid.ed.gov, also provides information about options that may be available to you.
Your May 2, 2014 Billing Statement Summary

To view your full statement, visit mygreatlakes.org.

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The fastest way to make your payment is at mygreatlakes.org. You can also pay by phone or by mail.

📞 (800) 236-4300 or (608) 246-1700
TTY: 711

Great Lakes
PO Box 530229
Atlanta, GA 30353-0229

You can self-serve 24/7.

If you pay by mail, include this number with your payment:
4-10-2015 Studentaid.ed.gov

complaint filed

Direct Plus Loan
ED Great Lakes referred by School.

"As already reported - My son is another victim of Wyotech’s instructors NEGLECT to teach & answer questions during classes. Misleading recruitment tactics (AST Diesel & Mngt = 100% job placement), was absolutely unable to find a job in his area of study. Daily phone calls at home & via cell to me and my son - the student - harassing & demanding payment, threatening collections & bad credit reporting. I refinanced my home to pay off this Parent Plus Loan. I was told by Tina Austin at Wyotech, during a financial phone call that I was responsible to finance my son’s education up until he was 21 years of age, but I did not have access to academic reports or progress. Any of my phone calls to instructors went to unanswered voicemail. I was able to speak to Director of Education - Harry Weiman - only once. This was a very bad experience for my son - he was left discouraged & depressed after coming home from Wyotech in Blairsville, PA. He never did get a job in Diesel."
WyoTech – Request for Readmission

Instructions:
1. This form must be completed and returned to the Student Services Dept. within 6 weeks of a readmission date.
2. Do not travel to WyoTech until your request for readmission is approved in writing.
3. Mail this form to:
   WyoTech
   Attn: Student Services
   500 Innovation Drive
   Blairsville, PA 15717

   If you have already filled out a readmission form in the Student services Dept, it is not necessary to complete this form again.

   Do not leave anything blank on this form as it could delay the readmission process.

   Applicant Name: JOHNNY WRIGHT     CMDS #: [redacted]
   Current Address: [redacted]        Soc Sec #: [redacted]
   Permanent Address: [redacted]      Telephone #: [redacted]

1. What date did you last attend school? 5/24/2012
2. Were you ever on probation while attending school? [ ] Yes [ ] No
3. If yes, what was the reason for your probation? __________________________________________________________________________
4. Why did you leave school? TIME RELATED
5. *** Returning students must show up to class and record attendance on the day that their class begins. Any student who is absent on the first day of class will be un-scheduled and may not return for that re-start date.***

   Requested Return Date: 2/13/2013   Phase: 900/Power Trains/0AS

I understand that WyoTech reserves the right to refuse my request for readmission based upon my attendance and academic and social conduct history at WyoTech. I also understand that I should not travel to WyoTech until I am notified in writing that my request for readmission has been approved. Pending conditions met prior to return.

[Signature] 1/14/2013

Applicant Signature  Date
May 25, 2012

John D. Wright Jr.

Dear John:

Effective 5/24/12, you were suspended from school because you have exceeded the (10) tardy occurrences allowed in any one course. Your last official date of attendance was 5/24/2012.

You may apply for readmission for the phase beginning 2/2/2013 by completing the enclosed “Request for Readmission” form. Please be aware that the school reserves the right to refuse readmittance. This decision will be based upon your previous record at WYOTECH to include attendance, academics, professional and social behavior. The readmission process may take approximately six weeks to complete.

Do not travel to WYOTECH until you have been notified in writing that your request for readmission has been approved. A copy of this letter will be placed in your student permanent record and sent to your parents or guardian, subject to the privacy rights contained in the General Education Provisions Act, section 438.

Please contact your Coordinator or the Registrar with any questions regarding your suspension or readmission process.

Sincerely,

[Signature]

Harry Weimann
Director of Education

HW:cy
Enclosure

cc: Student Academic File
# Student Ledger

**Effective Date:** 05/24/2012
**Program Version:** Diesel Technology and Management 65 Credits AS 8 HR - Diesel Technology and Management 65 crs 1500 hrs AS

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**Charges** $21,575  **Payments** $22,012  **NT4 Payments** $508  **T4 Payments** $21,504  **Write Offs** $0  **Balance** $-436.92
### Student Ledger

**Blairsville**

00475
500 Innovation Drive
Blairsville, PA 15717

(300)22-6253

**Student ID**

**SSN**

**Start Date** 08-28-2011

**Program Version** Diesel Technology and Management 65 Credits AS Drop

**Current Status**

**Account Status**

**Clock Hours** 1,500.00

**LDA** 05-24-2012

**Payment Plan** 0

**Diesel Technology and Management 65 Credits AS**

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Balance: $436.92
## Student Ledger

**Blairsville**

00475  
500 Innovation Drive  
Blairsville, PA 15717  
(800)822-8253

### 8 HR - Diesel Technology and Management 65 crs 1500 hrs AS

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# Student Ledger

**Blairsville**

**00475**
500 Innovation Drive
Blairsville, PA 15717

**(800)822-8253**

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---|---|---|---|---|
$11,373 | $11,372 | $0 | $11,372 | $0 | .95 |
## Student Ledger

**Blairsville**  
00475  
500 Innovation Drive  
Blairsville, PA 15717  
(800)822-8253

### Wright Jr., John D

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**Student Totals:**

- Charges: $33,385.67  
- Payments: $43,444.58  
- Refund: ($10,058.86)  
- Balance: $0.95

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**Student Totals:**

- Charges: $33,385.67  
- Payments: $33,384.72  
- T4Payments: $32,876.14  
- NT4Payments: $508.00  
- Writeoffs: 0.58  
- Balance: 0.95
Student Account Summary - Wright Jr, John D

Student Name & Address

Name: Wright Jr, John D
Address: [Redacted]
City: UNITED STATES
Telephone: [Redacted]
Work phone: [Redacted]
E-Mail: [Redacted]
Birthdate: [Redacted]

Enrollment Details

Campus: Blairstown
Program: Diesel Technology and Management 65 Credits AS
Status: Drop
Enroll Date: 6/16/2011
Start Date: 8/26/2011
Enroll ID: WR11061839
Shift: Mod Morning
Balance: 0.95
Grad Date: 12/21/2012
LDA: 5/24/2012

Campus: Blairstown
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Status: Graduate
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Start Date: 2/13/2013
Enroll ID: WR13028568
Shift: Mod Morning
Balance: 0.95
Grad Date: 8/8/2013
LDA: 8/8/2013

Ledger Card

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Student Account Summary - Wright Jr, John D

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<th>Credit Adj</th>
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<td>5/21/2013</td>
<td>Stipend - DLPLUS2 2012-13 /</td>
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Acct. Balance 0.95

Expected Funding

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<th>Award Year</th>
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<th>Total</th>
<th>Exp. Amount</th>
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<td></td>
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</table>

Category Breakdown

<table>
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<th>Category</th>
<th>Total Charged</th>
<th>Total Credit Adj</th>
<th>Payment Applied</th>
<th>Category Balance</th>
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<td>TOTALS</td>
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<td>33,384.72</td>
<td>0.95</td>
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</tbody>
</table>
Dear Alison:

Our records indicate that you have received one or more Direct PLUS Loans to help pay for your child's enrollment in programs offered by Everest Institute, Everest College, or Everest University ("Everest") or WyoTech between 2010 and 2014. **You may be eligible to have those loans forgiven.**

The U.S. Department of Education determined that Everest and WyoTech published misleading job placement rates for many of its programs between 2010 and 2014. The specific programs and enrollment periods can be found at StudentAid.gov/ev-wy-findings.

If your child was enrolled in one of the programs on or after the date listed for that program, you may be able to receive forgiveness of your Direct PLUS Loans.

To apply for loan forgiveness:

- complete the enclosed attestation form and mail it to the address listed on the form
- or complete the form online at BorrowerDischarge.ed.gov/attestation/EverestWyoTech

For more information, please visit StudentAid.gov/corinthian.

If you have questions, call our hotline at 1-855-279-6207 or e-mail your questions to FSAOperations@ed.gov.

Thank you,

U.S. Department of Education
Office of Federal Student Aid

---

*Great Lakes*

Paid in Full $36,802.98

12-26-2016

Federal Student Aid

830 First Street, NE, Washington, DC 20202

StudentAid.gov
------- Forwarded message -------
From: U.S. Department of Education <noreply@studentaid.gov>
Date: Mon, Mar 30, 2020, 11:39 AM
Subject: Borrower defense discharge ineligibility information for you
To: [redacted]

Click here to view this email as a web page.
Dear Alison Wright:

The U.S. Department of Education (ED) has completed its review of your application under the applicable Borrower Defense to Repayment regulations for discharge of your William D. Ford Federal Direct Loans (Direct Loans) made in connection with your or your child's enrollment at a school operated by Corinthian Colleges, Inc. (CCI), including Everest Institute, Everest College, Everest University, Heald College, and WyoTech. "You" as used here should be read to include your child if you are a Direct PLUS Loan borrower who requested a discharge for loans taken out to pay for a child's enrollment at a CCI-operated institution. ED has determined that your application is ineligible for relief based on review of the facts of your claim and the regulatory criteria for relief; this decision means that your Direct Loans will not be discharged. ED explains the reasons below.

**Applicable Law**

For Direct Loans first disbursed prior to July 1, 2017, a borrower may be eligible for a discharge (forgiveness) of part or all of one or more Direct Loans if the borrower's school engaged in acts or omissions that would give rise to a cause of action against the school under applicable state law. See § 455(h) of the Higher Education Act of 1965, as amended, 20 U.S.C. § 1087e(h), and 34 C.F.R. § 685.206(c) and 685.222 (the Borrower Defense regulations). ED recognizes a borrower's defense to repayment of a Direct Loan only if the cause of action directly relates to the Direct Loan or to the school's provision of educational services for which the Direct Loan was provided. 34 C.F.R. §§ 685.206(c)(1), 685.222(a)(5); U.S. Department of Education, Notice of Interpretation, 60 Fed. Reg. 37,769 (Jul. 21, 1995).

**Borrower Defense Claims Based on CCI Job Placement Rates**

ED has determined that students who enrolled in certain programs at certain schools operated by CCI between 2010 and 2014 have borrower defense claims arising from the publication of misleading job placement rates for many of their programs of study and are eligible for a discharge of part or all of their loans under ED's Borrower Defense regulation. Lists of covered programs and time periods are available online at these links for Everest/WyoTech and Heald, respectively: StudentAid.gov/ev-wy-findings and StudentAid.gov/heald-findings (the "covered programs").

In order to have a successful borrower defense claim based on ED's CCI findings, you must have enrolled in one of the covered programs during a listed time period. ED has established a process for the review of borrower defense to repayment claims for job placement rates asserted by borrowers enrolled in the covered programs at CCI schools during the eligibility period. Each CCI borrower's application is reviewed under the same process to determine whether the borrower qualifies for borrower defense to payment relief based on a CCI school job placement rate claim.

**Why was my application determined to be ineligible for CCI Job Placement Rates?**
ED reviewed your application regarding the campus(es) you attended, the program(s) in which you enrolled, and the date(s) that you enrolled. ED also reviewed data from the National Student Loan Data System (NSLDS®) and, if available, school-provided data regarding your program(s) and enrollment date(s), in addition to the enrollment information on any official school documents that you provided with your application.

Based on that review, ED has determined that you did not enroll in a covered program at a CCI school during the eligibility period. Either (a) the initial enrollment date(s) or program(s) you provided in your application fell outside the eligibility period for a covered program(s) at one or more of the CCI campuses or (b) both NSLDS data and the school's data demonstrated that you were not enrolled in a covered program at one or more of the CCI schools during the eligibility period.

Accordingly, based upon our review of your job placement rate allegation, ED has determined that your borrower defense to repayment application is ineligible and will not discharge your Direct Loan(s).

**Why was my application determined to be ineligible for other allegations?**

In addition, ED reviewed your other borrower defense claims based on any evidence submitted by you in support of your application, your loan data from NSLDS, and evidence provided by other borrowers.

**Allegation 1: Job Placement Rate**

You allege that WyoTech engaged in misconduct related to Job Placement Rate. This allegation fails for the following reason(s): Outside Coverage Dates.

Your claim for relief on this basis therefore is denied.

**Allegation 2: Educational Services**

You allege that WyoTech engaged in misconduct related to Educational Services. This allegation fails for the following reason(s): Failure to State a Legal Claim.

Your claim for relief on this basis therefore is denied.

**Allegation 3: Employment Prospects**

You allege that WyoTech engaged in misconduct related to Employment Prospects. This allegation fails for the following reason(s): Failure to State a Legal Claim.

Your claim for relief on this basis therefore is denied.

**Allegation 4: Program Cost and Nature of Loans**

You allege that WyoTech engaged in misconduct related to Program Cost and Nature of Loans. This allegation fails for the following reason(s): Failure to State a Legal Claim.
Your claim for relief on this basis is therefore is denied.

**Allegation 5: Career Services**

You allege that WyoTech engaged in misconduct related to Career Services. This allegation fails for the following reason(s): Failure to State a Legal Claim.

Your claim for relief on this basis therefore is denied.

**What evidence was considered in determining my application's ineligibility for other allegations?**

We reviewed evidence provided by you, other borrowers, and the school. Additionally, we considered evidence gathered from the following sources:

1. Documents from the Illinois, California, Massachusetts and Wisconsin Attorneys General
2. Data from National Center for Education Statistics
5. Statements from former Corinthian Colleges Inc., executive Mark Pelesh

**What if I do not agree with this decision?**

If you disagree with this decision, you may ask ED to reconsider your application. To submit a request for reconsideration, please send an email with the subject line "Request for Reconsideration ref: _00Dt0Gyiq._500t0DPvMH:ref" to BorrowerDefense@ed.gov or mail your request to U.S. Department of Education, P.O. Box 1854, Monticello, KY 42633. In your Request for Reconsideration, please provide the following information:

1. Which allegation(s) you believe that ED incorrectly decided;
2. Why you believe that ED incorrectly decided your borrower defense to repayment application; and
3. Identify and provide any evidence that demonstrates why ED should approve your borrower defense to repayment claim under the applicable law set forth above.

ED will not accept any Request for Reconsideration that includes new allegations. If you wish to assert allegations that were not included in your application, please see the following section.
Additionally, your loans will not be placed into forbearance during the reconsideration process. Failure to begin or resume repayment will result in collection activity, including administrative wage garnishment, offset of state and federal payments you may be owed, and litigation. For more information about the reconsideration process, please contact our borrower defense hotline at 1-855-279-6207 from 8 a.m. to 8 p.m. Eastern time (ET) on Monday through Friday.

**Can I apply for borrower defense if I have additional claims?**

If you wish to file a new application regarding acts or omissions by the school other than those described in borrower defense application 01469003, please submit an application at StudentAid.gov/borrower-defense. In the new application, you should explain in the relevant section(s) the basis for any new borrower defense claim(s) and submit all supporting evidence.

**What should I do now?**

Because your borrower defense to repayment application was found to be ineligible, you are responsible for repayment of your loans. ED will notify your servicer(s) of the decision on your borrower defense to repayment application within the next 15 calendar days, and your servicer will contact you within the next 30 to 60 calendar days to inform you of your loan balance. Further, if any loan balance remains, the loans will return to their status prior to the submission of your application. If your loans were in forbearance as a result of your borrower defense to repayment application, the servicer will remove those loans from forbearance. *See COVID-19 Note below.

If your loans are in default and are currently in stopped collections, your loans will be removed from stopped collections. Failure to begin or resume repayment could result in collection activity such as administrative wage garnishment, offset of state and federal payments that you may be owed, and litigation. *See COVID-19 Note below.

While normally interest would not be waived for unsuccessful borrower defense applications, given the extended period of time it took ED to complete the review of this application, the Secretary is waiving any interest that accrued on your Direct Loans from the date of the filing of your borrower defense application to the date of this notification. Your servicer will provide additional information in the coming months regarding the specific amount of interest adjusted. *See COVID-19 Note below.

*COVID-19 Note: In March 2020, President Trump announced an interest rate waiver, and Secretary DeVos authorized additional payment and collection relief to provide student loan relief to borrowers during the coronavirus (COVID-19) national emergency. Effective March 13, 2020, all borrowers with federally held student loans will: (1) automatically have their interest rates set to 0% for a period of at least 60 days; and, (2) have the option to suspend their payments for at least 60 days to allow greater flexibility during the national emergency. In addition, also effective March 13, 2020, for defaulted borrowers, all proactive collection activities, wage garnishments, and Treasury offsets have been stopped. Your federal loan servicer will answer any questions you have about your specific situation. In addition, Federal Student Aid’s COVID-19 information page for students, borrowers, and parents is located at StudentAid.gov/coronavirus. Please visit the page regularly for updates.

**What if I have another pending borrower defense application?**
If you have additional pending borrower defense to repayment applications, this information applies to you:

- If your loans associated with an additional borrower defense to repayment application that is still pending are in forbearance or another status that does not require you to make payments, your loans will remain in forbearance or that other status. Similarly, if your loans associated with that borrower defense application are in default and you are currently in stopped collections, those loans will remain in stopped collections.

- If you are unsure if you have additional pending applications, or if you would like to check on the status of your loans associated with an additional application, contact our borrower defense hotline at 1-855-279-6207 from 8 a.m. to 8 p.m. ET on Monday through Friday.

ED offers a variety of loan repayment options, including the standard 10-year repayment plan, as well as extended repayment, graduated repayment, and income-driven repayment plans. For more information about student loan repayment options, visit StudentAid.gov/plans. If you have questions about the status of your loans or questions about repayment options, please contact your servicer(s). If you do not know the name of your federal loan servicer, you may go to StudentAid.gov to find your servicer and view your federal loan information.

Sincerely,

U.S. Department of Education
Federal Student Aid

Federal Student Aid
An Office of the U.S. Department of Education
830 First Street, NE, Washington, D.C. 20202
StudentAid.gov/borrower-defense
Exhibit 26
Borrower Defense Claim Review Productivity
Requirements, Incentives and Support Plan - 2020

All Borrower Defense Unit ("BDU") attorneys and law clerks are expected to perform accurate and efficient claim review as an essential element of the position. From the outset of training, you have been advised that BDU attorneys and law clerks are required to adjudicate a minimum of five cases per hour while also maintaining a very low error rate. The following is intended to further clarify how your metrics are evaluated, as well as the thresholds for incentive eligibility and support available for those needing to improve their performance. Please note that these apply for junior attorneys and law clerks who have worked at FSA for three months after completion of claim review training (hereinafter "Trained Reviewers").

Required Metrics

- **Case Review**: Trained Reviewers must review, on average, a minimum of 5 cases per hour.²
  - Claim review rate averages shall be determined on a weekly basis.
  - Assigning any case to a new status constitutes “reviewing a case.”³
  - Exceptions may apply at supervisors’ discretion depending on the nature of the claims at issue.
- **Error Rates**: Trained Reviewers are required to maintain an error rate under 5%.
  - The error rate is based on all allegations reviewed over the past four weeks, including both minor and major errors, as determined by QC staff.

Incentives

- **Credit Hours**: Trained Reviewers who regularly exceed the Required Metrics for claim review productivity and error rates are eligible for credit hours in accordance with FSA policies.
  - Eligibility will be reevaluated for any Trained Reviewer whose performance declined in the preceding pay period.
- **Compensatory Time / Overtime**: Trained Reviewers who maintain a minimum average of 7 cases reviewed per hour with an error rate under 3%, subject to BDU workflow and supervisor approval, are eligible for compensatory time and/or overtime in accordance with FSA policies.⁴
  - Eligibility will be reevaluated for any Trained Reviewer whose performance declined in the preceding pay period.
- **Individual Awards**: The Director of the Borrower Defense Unit may, at her discretion and subject to availability, approve monetary bonuses or time-off awards to high achievers in claim review and QC.

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¹ Junior attorneys and law clerks who have served on the BDU for fewer than three months after their claim review training will adhere to the claim review expectations set by their supervisors and will work to ramp up to the above standard (5 cases per hour, on average, with an error rate under 5%).

² BDU Supervisors will collect and analyze Trained Reviewers’ self-reported case review rate data, perform spot-checking validation, and perform periodic audits to ensure the accuracy of self-reported data. Inaccurate self-reported data may result in a full audit of the Trained Reviewers’ work and appropriate disciplinary action.

³ Inappropriately assigning a case to a new status is an error. Any Trained Reviewer who appears to be assigning cases to new statuses in order to increase review numbers may be subject to a full audit of the Reviewer’s completed work and appropriate disciplinary action.

⁴ This category will also include active members of the QC Team.
Support

- **Training**: To promote claim review accuracy and efficiency, and to assist Trained Reviewers in achieving the higher metrics required for incentives, the BDU will provide ongoing and remedial training. This may include:
  - Continual Training
    - Weekly question and answer sessions
    - Training sessions on topics such as increasing speed and accuracy, identifying and distinguishing between different federal student loans, producing Salesforce reports and using Excel to extrapolate data, determining whether an allegation states a claim, and other topics, as necessary
  - Remedial Training
    - Mandatory attendance at targeted continual training sessions
    - One on one sessions with a member of the QC team
    - One on one sessions with your supervisor

- **Heightened Monitoring**: The metrics of Trained Reviewers who do not meet the Required Metrics for the preceding pay period\(^5\) will be monitored very closely by their Supervisors and the Director of Borrower Defense (“Heightened Monitoring”).
  - Trained Reviewers who meet all Required Metrics for two consecutive pay periods will be removed from Heightened Monitoring.
  - Attendance at supplemental or remedial training sessions may be required.
  - For Trained Reviewers on Heightened Monitoring for more than two pay periods, the Reviewer and his or her Supervisor will meet with the Director of Borrower Defense to discuss the Reviewer’s failure to meet the requirements of the attorney/law clerk position.

\(^5\) While this process is consistent with the current informal monitoring, formal Heightened Monitoring will begin on June 22, 2020 for any Trained Reviewer who fails to meet Required Metrics for the pay period beginning June 8, 2020.