

ENSURING EDUCATIONAL INTEGRITY



10 STEPS TO IMPROVE STATE

OVERSIGHT OF FOR-PROFIT SCHOOLS

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GOVERNMENT INVESTIGATIONS AND LAWSUITS INVOLVING FOR-PROFIT SCHOOLS¹ (2004 – MAY 2014)

SCHOOLS/ OWNERS	GOVERNMENT AGENCY	INVESTIGATION OR LAWSUIT?	DATE	ALLEGATIONS OR ISSUES
Corinthian Colleges, Inc. ²	AGs from AR, AZ, CO, CT, HI, ID, IA, KY, MO, NC, NE, NM, OR, PA, TN, WA	Multi-state Investigation	1/2014	Organizational information; tuition, loan and scholarship information; lead generation activities; enrollment qualifications for students; complaints; accreditation; completion and placement statistics; graduate certification and licensing results; student lending activities.
ITT Educational Services, Inc. ⁴	AGS from AR, AZ, CT, ID, IA, KY, MO, NE, NC, OR, PA, TN and WA	Multi-state Investigation	1/2014	Marketing and advertising, recruitment, financial aid, academic advising, career services, admissions, licensure exam pass rates, accreditation, student retention, graduation rates and job placement rates.
Career Education Corp. ⁶	AGs from AR, AZ, CT, ID, IA, KY, MO, NE, NC, OR, PA,TN, WA	Multi-state Investigation	1/2014	Student-recruitment practices, graduate employment statistics, graduate employment certification and licensing results, and student lending activities.
Education Management Corporation ⁸	AGs from AZ, AR, CT, ID, IA, KY, MO, NE, NC, OR, PA, TN, WA ⁹	Multi-state Investigation	1/2014	Practices relating to recruitment, graduate placement statistics, graduate certification and licensing results, and student lending activities.
Ashford University; Bridgepoint Education, Inc. ¹¹	CA AG	Investigation	1/2013	False advertising; false or misleading statements during telemarketing calls.
Heald College; Everest Colleges; Everest Univ. Online; Everest College Phoenix, Inc.; Wyotech; Corinthian Colleges, Inc. ¹³	CA AG	Lawsuit	10/2013	Inflated and misrepresented job placement rates to students and investors, advertised programs that it does not offer and disciplined call center employees when they tried to tell prospective students the truth; unlawfully used military seals in advertising; and inserted unlawful clauses into enrollment agreements.
Bryman College, Everest Colleges, Nat'l Inst. of Technology; Corinthian Colleges, Inc. ¹⁵	CA AG	Lawsuit	7/2007	Inflation of placement rates; failure to disclose completion rates; overstating starting salaries of graduates; failure to meet minimum performance standards.
Corinthian Colleges, Inc. ¹⁸	CFPB	Civil Investigative Demand	4/2012 (CID); 12/2013 (NORA letter)	Unlawful acts or practices relating to advertising, marketing or origination of private student loans. NORA letter states that CFPB may seek injunctive and monetary relief.

OUTCOME OR PENDING (AS OF JUNE 1, 2014)	ACCREDITOR (IF ANY)	SCHOOLS OFFER ONLINE/ DISTANCE PROGRAMS?	CREDENTIALS OFFERED
Pending	National— Everest Colleges (ACCSC); Everest Univ. Online (ACICS); Wyotech (ACCSC); Regional— Everest College Phoenix (HLC); Heald (WASC Senior College and University Commission) ³	Everest Univ. Online; Everest College Phoenix	Certificates, Associate, Bachelor's and Master's Degrees
Pending	National (ACICS) ⁵	Yes	Associate, Bachelor's and Master's Degrees
Pending	National— Sanford-Brown. (ACICS); Regional— American InterContinental Univ. (HLC); Briarcliffe College (MSACS); Colorado Technical Univ. (HLC) ⁷	Yes	Certificate, Associate, Bachelor's, Master's and Doctoral Degrees
Pending	National and regional accreditation at different institutions ¹⁰	Yes	Certificates, Associate, Bachelor's, Master's and Doctoral Degrees
Pending	Regional (WASC Senior College and University Commission) ¹²	Yes	Associate, Bachelor's and Master's Degrees
Pending	National— Everest Colleges (ACCSC); Everest Univ. Online (ACICS); Wyotech (ACCSC); Regional— Everest College Phoenix (HLC); Heald (WASC Senior College and University Commission) ¹⁴	Everest Univ. Online; Everest College Phoenix	Certificates, Associate, Bachelor's, and Master's Degrees
Judgment providing for: (1) \$4.3 in restitution; (2) \$1.5 in private loan credits; (3) \$700,00 for costs, fees, and Unfair Competiion Fund; and (4) injunctive relief. 16	National— Everest Colleges and Bryman Colleges (now all Everest Colleges) (ACCSC); Nat'l Inst. of Technology (now Wyotech) (ACCSC) ¹⁷	No	Certificates, Associate, and Bachelor's Degrees
Pending	National— Everest Colleges (ACCSC); Everest Univ. Online (ACICS); Wyotech (ACCSC); Regional— Everest College Phoenix (HLC); Heald (WASC Senior College and University Commission) ¹⁹	Everest Univ. Online; Everest College Phoenix	Certificates, Associate, Bachelor's and Master's Degrees

SCHOOLS/ OWNERS	GOVERNMENT AGENCY	INVESTIGATION OR LAWSUIT?	DATE	ALLEGATIONS OR ISSUES
ITT Educational Services, Inc. ²⁰	CFPB	Lawsuit	2/2014	Misleading representations about accreditation and transferability of credits; aggressive tactics to recruit students and convince them to take out student loans; and coercing students to take out private student loans.
Westwood College (Colorado); Alta Colleges Inc. ²²	CO AG	Lawsuit	3/2012	Misrepresented and inflated job placement rates and graduate employment salaries; misled students about costs of attendance, the terms of institutional financing, and the quality of academic programs; failure to dislcose that credits were not transferable; misrepresentations regarding teh costs covered by military benefits.
Argosy University; Education Management Corporation ²⁵	CO AG	Lawsuit	12/2013	Misrepresented accreditation status of two psychology doctoral programs and that program would lead to licensure.
Apollo Group, Inc. ²⁸	Dept. of Education, Office of Inspector General	Investigation	4/2014	Marketing, recruitment, enrollment, financial aid, fraud prevention, student retention and other issues.
Corinthian Colleges, Inc. ³⁰	Dept. of Education	Review	2/2014	Dept. of Education sought extensive documentation on job placement rates and other academic data.
DeVry University; DeVry, Inc. ³²	Federal Trade Commission	Investigation	1/2014	Investigation as to whether entity is violating section 5 of FTC Act. Seeking documents related to advertising, marketing or sale of secondary or postsecondary educational products or services or educational accreditation products.
University of Phoenix; Apollo Group, Inc. 34	FL AG	Investigation	4/2013	Misrepresentations regarding financial aid and unfair and deceptive practices regarding recruitment, enrollment, placement.

OUTCOME OR PENDING (AS OF JUNE 1, 2014)	ACCREDITOR (IF ANY)	SCHOOLS OFFER ONLINE/ DISTANCE PROGRAMS?	CREDENTIALS OFFERED
Pending	National— ITT Tech (ACICS); Regional—Daniel Webster College (NEASC) ²¹	Yes	Associate, Bachelor's and Master's Degrees
Consent Judgment providing for: (1) \$2.5 million in credits for outstanding APEX accounts; (2) refunds of finance charges for some APEX accounts; (3) \$2 million for penalties, restitution, costs and fees; and (4) injunctive relief. ²³	National (ACICS or ACCSC) ²⁴	Yes	Diplomas, Associate and Bachelor's Degrees
Consent Judgment providing for: (1) injunctive relief; (2) payment of \$3.3 million (\$2.870 million in restitution; \$500,000 for restitution, attorney fees and costs, consumer education and/or future enforcement at state's discretion; and \$1 million in civil penalties). ²⁶	Regional (WASC, Senior College and University Commission) ²⁷	No	Associate, Bachelor's, Master's, and Doctoral Degrees
Pending	Regional (HLC) ²⁹	Yes	Certificates, Associate, Bachelor's, Master's and Doctoral Degrees
Pending	National— Everest Colleges (ACCSC); Everest Univ. Online (ACICS); Wyotech (ACCSC); Regional— Everest College Phoenix (HLC); Heald (WASC Senior College and University Commission) ³¹	Yes	Certificates, Associate, Bachelor's and Master's Degrees
Pending	Regional (HLC) ³³	Yes	Associate, Bachelor's and Master's Degrees
Pending	Regional (HLC) ³⁵	Yes	Certificates, Associate, Bachelor's, Master's and Doctoral Degrees

SCHOOLS/	GOVERNMENT	INVESTIGATION		
OWNERS	AGENCY	OR LAWSUIT?	DATE	ALLEGATIONS OR ISSUES
Sanford-Brown Institute; Career Education Corp. ³⁶	FL AG	Investigation	11/2010	Possible unfair and deceptive trade practices and misrepresentations regarding business practices.
Concorde Career Institute; Concorde Career Colleges, Inc. ³⁸	FL AG	Investigation	11/2010	Misrepresentations regarding financial aid and unfair/deceptive acts re recruitment, enrollment and placement.
Argosy University; Education Management Corporation ⁴⁰	FL AG	Investigation	10/2010	Potential misrepresentations in recruitment, financial aid and other areas.
Keiser University, Everglades University, Keiser Career College; Everglades College, Inc.; Bar Education, Inc. ⁴²	FL AG	Investigation	10/2012	Misleading or inaccurate information in areas such as costs, accreditation, transferability of credits and federal student loan terms.
Kaplan University; Kaplan, Inc. (a subsidiary of Graham Holdings Co.) ⁴⁴	FL AG	Investigation	10/2012	Misrepresentations regarding financial aid; unfair/deceptive practices re recruitment, enrollment, placement and graduation rates.
MedVance Institute (now Fortis College or Fortis Institute); KIMC Investments, Inc. (now owned by Educational Affiliates, Inc.) ⁴⁶	FL AG	Investigation	6/2012	Misrepresentations regarding financial aid, high pressure sales techniques, and unfair practices in recruiting, enrollment, accreditation, job placement and graduation rates. ⁴⁷
Ashford University; Bridgepoint Education, Inc. ⁵⁰	IA AG	Investigation	5/2014	Telemarketers made misleading statements and used high pressure sales tactics and emotionally charged appeals to pressure prospective students to enroll in on-line programs; misrepresented that education degree would allow graduates to become classroom teachers when many graduates would have to meet additional requirements on a state-by-state basis; unfairly imposed a "technology services fee" on all students after 6 weeks of enrollment and retained fee regardless of how long student remained enrolled; and as a result many students did not complete programs.

OUTCOME OR PENDING (AS OF JUNE 1, 2014)	ACCREDITOR (IF ANY)	SCHOOLS OFFER ONLINE/ DISTANCE PROGRAMS?	CREDENTIALS OFFERED
Pending	National (ACICS) ³⁷	No	Certificates, Associate and Bachelor's Degrees
Pending	National (ACCSC) ³⁹	Yes	Certificates and Associate Degrees
Pending	Regional (WASC Senior College and University Commission) ⁴¹	No	Associate, Bachelor's, Master's and Doctoral Degrees
Assurance of Voluntary Compliance providing for: (1) injunctive relief; (2) retraining of eligible students; (3) \$375,000 to scholarship fund; (4) \$175,000 in attorneys' fees to AG	Regional (SACSCOC) ⁴³	Yes	Associate, Bachelor's, Master's and Doctoral Degrees
Pending	Regional (HLC and NCACS) ⁴⁵	Yes	Certificates, Associate, Bachelor's and Master's Degrees
Assurance of Voluntary Compliance providing for: (1) free retraining for eligible students; (2) \$600,000 in scholar- ship donations; and (3) voluntary injunctive relief. ⁴⁸	National (ABHES and COE) ⁴⁹	Currently, yes; at time of AVC, no.	Diplomas and Associate's Degrees
Assurance of Voluntary Compliance provides for: (1) \$7.25 million in consumer restitution, fees and costs; and (2) compliance measures.	Regional (WASC Senior College and University Commission) ⁵¹	Yes	Associate, Bachelor's and Master's Degrees

SCHOOLS/ OWNERS	GOVERNMENT AGENCY	INVESTIGATION OR LAWSUIT?	DATE	ALLEGATIONS OR ISSUES
Westwood College (Illinois); Alta Colleges Inc. ⁵²	IL AG	Lawsuit	1/2012	Misrepresented (1) its criminal justice degree program would qualify students for law enforcement jobs, when in fact it qualify few graduates for such jobs becasue it lacked regional accreditation; (2) that credits from the same program were transferable; (3) that institution had or would obtain regional accreditation; (4) financial aid, including about private student loan financing program.
Corinthian Colleges, Inc. ⁵⁴	IL AG	Investigation	12/2011 ⁵⁵	Misleading enrollees about post-graduation career prospects.
DeVry University; DeVry, Inc. ⁵⁷	IL AG	Investigation	4/2013	Payment of incentive compensation to recruiters.
Daymar College; Daymar Learning, Inc. ⁵⁹	KY AG	Lawsuit	7/2011	Deceiving and misleading students about textbooks and financial aid, engaging in unlawful restraint on trade, providing false and misleading information to students about transferability of credits. Complaint also alleges that some programs do not meet accreditation standards and that school enrolled students who do not meet admissions criteria.
National College; National College of Kentucky, Inc. ⁶¹	KY AG	Investigation	12/2010	Misleading marketing practices.
National College; National College of Kentucky, Inc. ⁶³	KY AG	Lawsuit	9/2011	Providing false, misleading and deceptive information by inflating job placement rates.
Spencerian College; The Sullivan University, Inc. ⁶⁵	KY AG	Lawsuit	1/2013	Providing false, misleading and deceptive information about graduation success rates and by inflating job placement rates.
University of Phoenix; Apollo Group, Inc. ⁶⁷	MA AG	Investigation	4/2013	Deceptive practices concerning recruitment and financial aid.

OUTCOME OR PENDING (AS OF JUNE 1, 2014)	ACCREDITOR (IF ANY)	SCHOOLS OFFER ONLINE/ DISTANCE PROGRAMS?	CREDENTIALS OFFERED
Pending	National (ACICS or ACCSC) ⁵³	Yes	Diplomas, Associate and Bachelor's Degrees
Pending	National— Everest Colleges (ACCSC); Everest Univ. Online (ACICS); Wyotech (ACCSC); Regional— Everest College Phoenix (HLC); Heald (WASC Senior College and University Commission) ⁵⁶	Yes	Certificates, Associate, Bachelor's and Master's Degrees
Pending	Regional (HLC) ⁵⁸	Yes	Associate, Bachelor's and Master's Degrees
Pending	National (ACICS) ⁶⁰	Yes	Diplomas, Associate and Bachelor's Degrees
Pending. In December 2013, court ordered \$1,000/day civil penalty against school retroactive to July 31, 2013. In addition, court ordered school's lawyers to pay \$10,000 to KY AG. Court said school repeatedly abused legal system to obstruct a valid investigation.	National (ACICS) ⁶²	Yes	Diplomas, Associate, Bachelor's and Master's Degrees
Pending	National (ACICS) ⁶⁴	Yes	Diplomas, Associate, Bachelor's and Master's Degrees
Pending	National (ACICS) ⁶⁶	No	Diplomas/Certificates and Associate Degrees
Pending	Regional (HLC) ⁶⁸	Yes	Certificates, Associate, Bachelor's, Master's and Doctoral Degrees

SCHOOLS/ OWNERS	GOVERNMENT AGENCY	INVESTIGATION OR LAWSUIT?	DATE	ALLEGATIONS OR ISSUES
Career Education Corp. ⁶⁹	MA AG	Investigation	9/2012	Violation of consumer protection laws with respect to marketing and advertising, job placement and student outcomes, recruitment, and financing of education.
Everest Institute (Massachusetts campuses); Corinthian Colleges, Inc. ⁷¹	MA AG	Lawsuit	4/2014	Allegations of deceptive marketing, high pressure enrollment tactics and misrepresentations regarding employment opportunities, graduate earnings, transferability of credits, availability of externships, nature and availability of financial aid, nature and quality of programs, and steering students into subprime loan program.
DeVry University; DeVry, Inc. ⁷³	MA AG	Investigation	4/2013	False statements relating to state student loans, guarantees, and grants.
New England Institute of Art; Education Management Corporation ⁷⁵	MA AG	Investigation	1/2013	Marketing, recruiting, and financing practices.
ITT Educational Services, Inc. ⁷⁷	MA AG	Investigation	10/2012	Requested documents related to financial aid, recruitment, career services, marketing and advertising, retention and graduation rates.
Kaplan Career Institute; Kaplan, Inc. (a subsidiary of Graham Holdings Co.) ⁷⁹	MA AG	Investigation	5/2011	Recruitment of students and financing of education.
Sullivan & Cogliano Training Centers; Sullivan & Cogliano Training Centers, Inc. ⁸¹	MA AG	Lawsuit	10/2013	Deceived and misled the public and prospective students: Misrepresented: • the scope, nature, character, and length of its programs; • the success of its students in obtaining jobs in the students' field of study; • the employment opportunities available in students' field of study; • the assistance school provided in obtaining employment in students' field of study' • the availability of internships, together with the training provided by and employment opportunities accompanying internships; and • the cost of certification tests taken by students. Also, misrepresentations to accreditor and to state oversight agency.

OUTCOME OR PENDING (AS OF JUNE 1, 2014)	ACCREDITOR (IF ANY)	SCHOOLS OFFER ONLINE/ DISTANCE PROGRAMS?	CREDENTIALS OFFERED
Pending	National— Sanford-Brown. (ACICS); Regional— AIU (HLC); Briarcliffe College (MSACS); CTU (HLC) ⁷⁰	Yes	Certificates, Associate, Bachelor's, Master's and Doctoral Degrees
Pending	National (ACCSC) ⁷²	Yes	Associate, Bachelor's and Master's Degrees
Pending	Regional (HLC) ⁷⁴	Yes	Associate, Bachelor's and Master's Degrees
Pending	Regional (NEASC) ⁷⁶	No	Certificates, Associate and Bachelor's Degrees
Pending	National (ACICS) ⁷⁸	Yes	Associate, Bachelor's and MBA Degrees
Pending	Each Kaplan Career Institute is nationally accredited by ACCSC, ACICS or COE ⁸⁰	Yes	Diplomas and Associate Degrees
Final Judgment by Consent which provided for: 1) Injunctive relief (including shut down of 2 programs); and 2) Payment of \$425,000.82	National (COE)	No	Certificates

SCHOOLS/ OWNERS	GOVERNMENT AGENCY	INVESTIGATION OR LAWSUIT?	DATE	ALLEGATIONS OR ISSUES
American Career Institute (ACI); The Career Institute, LLC ⁸³	MA AG	Lawsuit	11/2013	Falsified documents (enrollment records, attendance records, and student grades) and forged student signatures to maintain accreditation; enrolled students who did not meet minimum qualifications (students who did not have a high school degree or GED; students who had a criminal record that would prevent them from obtaining employment in the fields being studied); misrepresented graduate job placement rates; and failed to provide students the education for which they incurred significant debts (failed to provide course materials students paid for; not providing skills training necessary for externships/employment); failed to provide refunds upon school closure.
Universal Technical Institute; Universal Technical Institute, Inc. ⁸⁴	MA AG	Investigation	12/2012	False claims submitted to the state for student loans, guarantees.
Corinthian Colleges, Inc. ⁸⁶	MN AG	Investigation	7/2013	Potential issues related to financial aid, admissions, students, and other areas.
Herzing University; Herzing, Inc. ⁸⁸	MN AG	Investigation	11/2013	Misrepresentations regarding programmatic accreditation of Associate in Applied Science in Clinical Medical Assisting Program; misrepresentation that same program would qualify graduates to take private certification exam required for employment.
Ashford University; Bridgepoint Education, Inc. ⁹⁰	NC AG	Investigation	10/2011	Whether business practices complied with consumer protection laws.
Kaplan College (Charlotte, NC campus); Kaplan, Inc. (a subsidiary of Graham Holdings Co.) ⁹²	NC AG and NC Community College System	Investigation	1/2012	Allegations that students were misled about whether Dental Assistant Program was accredited.

OUTCOME OR PENDING (AS OF JUNE 1, 2014)	ACCREDITOR (IF ANY)	SCHOOLS OFFER ONLINE/ DISTANCE PROGRAMS?	CREDENTIALS OFFERED
Pending	National (ACCET)	No	Certificates
Pending	National (ACCSC) ⁸⁵	No	Certificates
Pending	National— Everest Colleges (ACCSC); Everest Univ. Online (ACICS); Wyotech (ACCSC); Regional— Everest College Phoenix (HLC); Heald (WASC Senior College and University Commission) ⁸⁷	Yes	Certificates, Associate, Bachelor's and Master's Degrees
Assurance of Discontinuance providing for: (1) Injunctive relief; and (2) option to obtain full refund for eligible students.	Regional Accreditation (HLC) ⁸⁹	Yes	Certificates, Associate and Bachelor's Degrees
Pending	Regional (WASC Senior College and University Commission) ⁹¹	Yes	Associate, Bachelor's and Master's Degrees
Withdrawal of license for Charlotte, NC Dental Assistant Program	National (ACICS) ⁹³	No	Certificates and Associate's Degrees

SCHOOLS/ OWNERS	GOVERNMENT AGENCY	INVESTIGATION OR LAWSUIT?	DATE	ALLEGATIONS OR ISSUES	
Breckenridge School of Nursing and Health Sciences (Albuquerque); ITT Educational Services, Inc. ⁹⁴	NM AG	Lawsuit	2/2014	Lack of accreditation for nursing program. Misleading students regarding transferability of credits.	
Ashford University; Bridgepoint Education, Inc. ⁹⁶	NY AG	Investigation	5/2011	Misrepresentations as to ability to find jobs for students, the quality of instruction, the cost of attending, and accreditation, among other things.	
Sanford-Brown Institute; American InterContinental Univ. (AIU); Briarcliffe College; Colorado Technical Univ. (CTU); Career Education Corp. ⁹⁸	NY AG	Lawsuit	8/2013	Inflated placement rates; mischaracterized employment as "in field" or "related field" placement; counted first day verification of employment as placement (even for singleday health fairs); failure to disclose lack of programmatic accreditation required to meet certification or licensure requirement for employment; and failure to disclose nontransferability of credits.	
Art Institute of New York (Education Management's only school located in New York); Education Management Corporation ¹⁰⁰	NY AG	Investigation	8/2011	Subpoena related to compensation of admissions representatives and recruiting activities.	
Corinthian Colleges, Inc. ¹⁰²	OR AG	Investigation	8/2011	Requested information and documents regarding advertising, compensation, training and evaluations of admissions personnel, job opportunities and placement of graduates, students complaints, and other matters.	
Apollo Group, Inc. ¹⁰⁴	SEC	Enforcement Inquiry	4/2012	Requested documents and information relating to certain stock sales by company insiders.	
Corinthian Colleges, Inc. ¹⁰⁶	SEC	Investigation	6/2013	Subpoena sought information relating to student information in the areas of recruitment, attendance, completion, placement, defaults on federal loans, as well as compliance with the U.S. Dept. of Educ.'s rules.	

OUTCOME OR PENDING (AS OF JUNE 1, 2014)	ACCREDITOR (IF ANY)	SCHOOLS OFFER ONLINE/ DISTANCE PROGRAMS?	CREDENTIALS OFFERED
Pending	National (ACICS) ⁹⁵	Yes	Associate Degrees
Pending	Regional (WASC Senior College and University Commission) ⁹⁷	Yes	Associate, Bachelor's and Master's Degrees
Assurance of Discontinuance providing for: (1) injunctive relief; \$9.25 million restitution; \$1 million civil penalty	National— Sanford-Brown. (ACICS); Regional— AIU (HLC); Briarcliffe College (MSACS); CTU (HLC) ⁹⁹	Briarcliffe College; AIU; CTU	Certificate, Associate and Bachelor's Degrees—Sanford- Brown Inst.; Briarcliffe College; Associate's, Bachelor's and Master's Degrees—AIU; Associate, Bachelor's, Master's and Doctoral Degrees—CTU
Pending	National (ACICS) ¹⁰¹	No	Associate Degrees
Pending	National— Everest Colleges (ACCSC); Everest Univ. Online (ACICS); Wyotech (ACCSC); Regional— Everest College Phoenix (HLC); Heald (WASC Senior College and University Commission) ¹⁰³	Yes	Certificates, Associate, Bachelor's and Master's Degrees
Pending	Regional (HLC) ¹⁰⁵	Yes	Certificates, Associate, Bachelor's, Master's and Doctoral Degrees
Pending	National— Everest Colleges (ACCSC); Everest Univ. Online (ACICS); Wyotech (ACCSC); Regional— Everest College Phoenix (HLC); Heald (WASC Senior College and University Commission) ¹⁰⁷	Yes	Associate, Bachelor's and Master's Degrees ¹⁰⁸

SCHOOLS/ OWNERS	GOVERNMENT AGENCY	INVESTIGATION OR LAWSUIT?	DATE	ALLEGATIONS OR ISSUES
ITT Educational Services, Inc. ¹⁰⁹	SEC	Investigation	2/2013	Subpoena requested documents and communications relating to agreements entered into, in 2009 and 2010, with unaffiliated third parties to help students pay for cost of education through private student loan programs.
University of Phoenix; Apollo Group, Inc. ¹¹¹	U.S. Dept. of Ed	Gov Review	9/2004	Paying incentive compensation to recruiters.
Westwood College; Alta Colleges Inc. ¹¹³	U.S. Dept. of Justice	Lawsuit	4/2009	Alleged violations of Consumer Fraud and Business Practices Act. Misleading prospective students that its criminal justice degree program qualifies them for law enforcement jobs.
American Commercial College; American Commercial Colleges Inc. ¹¹⁵	U.S. Dept. of Justice	Lawsuit	5/2013	Made short-term private student loans that ACC repaid with federal Title IV funds to artificially inflate the amount of private funding counted for purposes of the 90/10 Rule. The short-term loans at issue were not sought or obtained by students on their own; rather, school orchestrated the loans for the sole purpose of manipulating its 90/10 Rule calculations.
University of Phoenix; Apollo Group, Inc. 117	U.S. Dept. of Justice	Lawsuit	12/2009	Paying incentive compensation to recruiters.
ATI Career Training Center; ATI Enterprises Inc. ¹¹⁹	U.S. Dept. of Justice	Lawsuit	8/2013	Misrepresentation of job placement rates; false certification of program and student eligibility for Dept. of Ed. financial aid; employees engaged in fraudulent practices to induce students to enroll and maintain their enrollment in school.
National College; National College of Kentucky, Inc. ¹²¹	U.S. Dept. of Justice	Lawsuit	5/2012	False Claims Act case. Knowingly violated accreditor's requirement to provide adequate consultation between team members and faculty by requiring faculty to sign Confidentiality and Non-Disparagement Agreement. Intimidated faculty to prevent dissemination of truthful information in order to maintain accreditation and receive federal funds. Presented false record or statement to federal government to get false or fraudulent claim paid.

OUTCOME OR		SCHOOLS OFFER ONLINE/	
PENDING (AS OF JUNE 1, 2014)	ACCREDITOR (IF ANY)	DISTANCE PROGRAMS?	CREDENTIALS OFFERED
Pending	National (ACICS) ¹¹⁰	Yes	Associate, Bachelor's and MBA Degrees
\$9.8 million settlement.	Regional (HLC) ¹¹²	Yes	Certificates, Associate, Bachelor's, Master's and Doctoral Degrees
Settlement provided for payment of \$7 million to U.S.	National (ACICS or ACCSC) ¹¹⁴	Yes	Diplomas, Associate and Bachelor's Degrees
Settlement providing for (1) payment of \$1 million to U.S.; (2) possible payment of additionall \$1.5 million under contingency clause in settlement.	National (ACICS) ¹¹⁶	No	Certificates
Settlement of \$67.5 million.	Regional (HLC) ¹¹⁸	Yes	Certificates, Associate, Bachelor's, Master's and Doctoral Degrees
Settlement provided for following payments from letters of credit: (1) \$3.7 million dollars to U.S. government; and (2) \$2 million in student loan refunds.	National (ACCSC)	No	Certificates and Associate Degrees ¹²⁰
Pending	National (ACICS) ¹²²	Yes	Diplomas, Associate, Bachelor's and Master's Degrees

SCHOOLS/ OWNERS	GOVERNMENT AGENCY	INVESTIGATION OR LAWSUIT?	DATE	ALLEGATIONS OR ISSUES
Stevens-Henager College; Starting in 1/2013, for- profit schools owned by Center for Excellence in Higher Education (nonprofit org) ¹²³	U.S. Dept. of Justice	Lawsuit	4/2014	Paying illegal compensation to recruiters for student enrollments. ¹²⁴
Everest Institute (Jonesboro, GA); Corinthian Colleges, Inc. ¹²⁶	U.S. Dept. of Justice and Dept. of Education	Investigation	4/2011	Employment and placement rates; attendance procedures.
Education Management Corporation ¹²⁸	US Govt. & AGs from CA,DC, FL, IL, IN, MA, MN, MT, NJ, NY, NM, TN	Lawsuit	4/2011	Incentive compensation paid to recruiters based upon student enrollment numbers.
Corinthian Colleges, Inc. ¹³⁰	WI AG	Investigation	1/2013	Investigation of recruitment practices and student borrowing.

OUTCOME OR PENDING (AS OF JUNE 1, 2014) Pending	ACCREDITOR (IF ANY) National (ACCSC) ¹²⁵	SCHOOLS OFFER ONLINE/ DISTANCE PROGRAMS?	CREDENTIALS OFFERED Associate, Bachelor's and Master's Degrees
D. II		N.	
Pending	National (ACCSC) ¹²⁷	No	Certificates
Claims based on compensation plan as written dismissed; claims based on compensation plan as implemented pending.	National and regional accreditation at different institutions ¹²⁹	Yes	Certificates, Associate, Bachelor's, Master's, and Doctoral Degrees
Pending	National— Everest Colleges (ACCSC); Everest Univ. Online (ACICS); Wyotech (ACCSC); Regional— Everest College Phoenix (HLC); Heald (WASC Senior College and University Commission) ¹³¹	Yes	Certificates, Associate, Bachelor's and Master's Degrees

Notes

- ¹ This chart is a survey of government actions against and investigations of for-profit schools based on media reports, school announcements, or publicly available information from government agencies or courts. It is not a complete list of all government actions or investigations initiated between 2004 and 2014.
- ² Corinthian Colleges, Inc., SEC Form 8-K (Jan. 27, 2014); Corinthian Colleges, Inc., "Corinthian Colleges Reports FY 2014 Third Quarter Results" (May 6,2014). All footnotes apply to the information in the row following the first footnote, up until the next footnote.
- ³ www.everest.edu; www.everestonline.edu; www.wyotech.edu; www.everestcollegephoenix.edu; www.heald.edu.
- ⁴ John Lauerman, "For-Profit Colleges Face New Wave of State Investigations," www.bloomberg.com (Jan. 29, 2014).
- ⁶ Oliver Staley, "Career Education Under Inquiry From 12 Attorneys General," www.businessweek.com (Jan. 27, 2014).
- ⁷ www.sanfordbrown.edu; www.aiuniv.edu; www.briarcliffe.edu; coloradotech.edu.
- ⁸ Education Management Corporation, SEC Form 8-K (Jan. 24, 2014).
- ⁹ Eric Kelderman, "State Attorneys General Open New Investigation Into For-Profit Colleges," www.chronicle.com (Jan. 28, 2014).
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