

MEMORANDUM

VETERAN AND SERVICEMEMBER COMPLAINTS ABOUT MISCONDUCT AND ILLEGAL PRACTICES AT ASHFORD UNIVERSITY

December 2017

I. Introduction

Ashford University is an online, for-profit university owned by Bridgepoint Education, Inc. (hereinafter "Bridgepoint"). Bridgepoint is a publicly-held education services company headquartered in San Diego, California.²

Bridgepoint acquired Ashford in 2005.³ Prior to 2005, Ashford was named Franciscan University of the Prairies and was a non-profit school located in Iowa.⁴ After Bridgepoint bought the school in 2005, Bridgepoint renamed it Ashford University.⁵

Currently, approximately 43,000 students are enrolled at Ashford.⁶ Ashford provides Associate's, Bachelor's and Master's Degrees.⁷

Initially, Ashford was accredited by the Higher Learning Commission (HLC).⁸ Over time, though, student enrollment in Ashford's online programs grew dramatically.⁹ By 2012, most of Ashford's students were being served out of the school's San Diego headquarters.¹⁰ As a result, HLC encouraged Ashford to establish accreditation with the Western Association of Schools and Colleges ("WSCUC") Senior College and University Commission.¹¹ Ashford did so and has been accredited by WSCUC since 2013.¹²

As a for-profit school, Ashford is subject to the "90/10 Rule," which requires that for-profit schools derive no more than ninety percent of their revenue from the federal student aid program. ¹³ The remaining ten percent of a for-profit school's revenue must come from other sources of funding. ¹⁴ Under current law, military education benefits may legally be counted on the 10 percent side. ¹⁵

¹ Bridgepoint, Inc., Annual Report (Form 10-K), at 5, 17 (March 7, 2017).

 $^{^{2}}$ Id.

³ *Id*.

⁴ *Id.*; *E.g.*, Press Release, California Attorney General, Attorney General Xavier Becerra Sues For-Profit Ashford University For Defrauding and Deceiving Students (Nov. 29, 2017), *available at* https://oag.ca.gov/news/press-releases/attorney-general-xavier-becerra-sues-profit-ashford-university-defrauding-and.

⁵ *E.g.*, Press Release, California Attorney General, Attorney General Xavier Becerra Sues For-Profit Ashford University For Defrauding and Deceiving Students (Nov. 29, 2017), *available at* https://oag.ca.gov/news/press-releases/attorney-general-xavier-becerra-sues-profit-ashford-university-defrauding-and.

⁶ Bridgepoint, Inc., Annual Report (Form 10-K), at 6 (March 7, 2017).

⁷ *Id.* at 5.

⁸ Eric Kelderman and Goldie Blumenstyk, 2 For-Profit Universities Get Good News From Accreditors, The Chronicle of Higher Education, July 11, 2013.

⁹ Letter from Ralph A. Wolff, President, WSCUC, to Elizabeth Tice, President and CEO, Ashford University (July 3, 2012) (on file with author).

 $^{^{10}}$ *Id*.

¹¹ *Id*.

¹² Bridgepoint, Inc., Annual Report (Form 10-K), at 92 (March 7, 2017).

¹³ 34 C.F.R. § 668.28.

¹⁴ *Id*.

¹⁵ *Id*.

As a result of the 90/10 Rule, many for-profit schools aggressively recruit veterans and servicemembers. Ashford's website notes that it is "committed to ensuring members of our military and their families have the resources they need to thrive during and after their service." Contrary, however, to the commitment Ashford describes on its website, 113 veterans and servicemembers who attended Ashford have submitted complaints to Veterans Education Success ("VES"), a non-profit veterans' organization, about their experiences at the school. Those students report that Ashford's tuition is very expensive for what they receive in return; that Ashford often counsels veterans and servicemembers to take out student loans despite being eligible for military education benefits; that Ashford officials are often unfamiliar with military education benefits; that an Ashford education is of low quality; that Ashford credits are often not recognized by other schools; and that an Ashford degree often does not lead to a job.

The complaints that VES has received mirror many allegations raised in actions that state governments and federal agencies have taken against Ashford and Bridgepoint.

Legal action against Ashford and Bridgepoint

Various legal actions have been taken against Ashford and Bridgepoint since 2005. Some such actions are listed below.

Most recently, on November 29, 2017, the California Attorney General sued both Ashford and Bridgepoint for engaging in unlawful business practices. ¹⁸ That lawsuit alleges that Ashford persuaded students to enroll by making false statements about how much financial aid students would receive, how many academic credits would transfer into and out of the school, and the school's ability to prepare students for careers in fields such as social work, nursing, medical billing, and teaching. ¹⁹ Additionally, the suit alleges that the school engaged in illegal debt collection practices. ²⁰ The suit "seeks restitution for students, a permanent injunction prohibiting similar activities in the future, and civil penalties from Ashford." ²¹

In 2016, the Consumer Financial Protection Bureau (CFPB) took action against Bridgepoint for deceiving students into taking out private student loans that cost more than advertised.²² The

¹⁶ Press Release, U.S. Sen. Comm. on Health, Education, Labor, & Pensions, Senate Dems: Time to Close For-Profit College Loophole Impacting Servicemembers, Veterans and Taxpayers (June 22, 2016), https://perma.cc/637C-88EE.

¹⁷ https://www.ashford.edu/online-learning-experience/military.

¹⁸ Press Release, California Attorney General, Attorney General Xavier Becerra Sues For-Profit Ashford University For Defrauding and Deceiving Students (Nov. 29, 2017), *available at* https://oag.ca.gov/news/press-releases/attorney-general-xavier-becerra-sues-profit-ashford-university-defrauding-and.

¹⁹ *Id*.

²⁰ *Id*.

²¹ *Id*.

²² Press Release, Consumer Financial Protection Bureau, Action Against Bridgepoint Education, Inc., for Illegal Student Lending Practices (Sept. 12, 2016), *available at* https://www.consumerfinance.gov/about-us/newsroom/consumer-financial-pro,tection-bureau-takes-action-against-bridgepoint-education-inc-illegal-student-lending-practices/.

CFPB ordered Bridgepoint to discharge all outstanding private loans the institution made to its students and to refund loan payments already made by borrowers.²³

In 2014, after a three-year investigation, the Iowa Attorney General announced a settlement with Ashford and Bridgepoint based on their violations of Iowa consumer protection law.²⁴ In the settlement, Ashford and Bridgepoint agreed to pay \$7.25 million to certain Ashford students in Iowa, and to change certain recruitment and enrollment practices.²⁵

Additionally, Bridgepoint and Ashford are both currently subjects of a number of investigations. For example, the Department of Justice is investigating Bridgepoint for possibly misrepresenting its compliance with the 90/10 rule;²⁶ the Securities and Exchange Commission is investigating Bridgepoint's accounting practices;²⁷ and the Massachusetts, North Carolina, and New York Attorneys General are currently investigating Ashford for possible violations of those states' respective consumer protection laws.²⁸ Meanwhile, Ashford's decision in 2016 to close its only physical campus, in Iowa, has drawn attention from the Department of Veterans Affairs and raised legal questions about the school's eligibility for GI Bill revenue.²⁹

About This Memorandum

In 2017, VES conducted a review of the complaints it has received from veterans and servicemembers who have attended Ashford. VES also interviewed a small number of those individuals.

This memorandum details the complaints that VES has received about Ashford and organizes them into nine broad categories, such as program costs and quality of instruction.

Research, interviews, and complaints were compiled by VES Legal Director Sean Marvin. This memorandum is modeled off similar memoranda previously produced for VES by the Yale Law School Veterans Legal Services Clinic and the Harvard Law School Legal Services Center.³⁰

²⁴ Press Release, Iowa Attorney General, Ashford University and Parent Company Bridgepoint Education Agree to \$7.25 Million Payment and Major Changes after Miller Alleges Consumer Fraud (May 16, 2014), *available at* https://www.iowaattorneygeneral.gov/newsroom/ashford-university-and-parent-company-bridgepoint-education-agree-to-7-25-million-payment-and-majo/.

²³ *Id*.

²⁵ *Id*.

²⁶ Bridgepoint, Inc., Annual Report (Form 10-K), at 98 (March 7, 2017).

²⁷ *Id*. at 97.

²⁸ *Id.* at 96-97.

²⁹ See Michael Vasquez, Inside the Scramble to Save Ashford U., The Chronicle of Higher Education, Nov. 10, 2017; Veterans Education Success, Ashford's Fight to Maintain GI Bill Access Raises Questions about the Enforcement and the Adequacy of Statutory Requirements (Nov. 2017), available at https://static1.squarespace.com/static/556718b2e4b02e470eb1b186/t/5a05926b0d9297cba279c201/1510314604212/Ashford+Report.FINAL.pdf.

³⁰ Memorandum from Yale Law School Veterans Legal Services Clinic to Veterans Education Success (2017) (on file with author); Project on Predatory Student Lending, Legal Services Center of Harvard Law School, Veteran and Servicemember Complaints about Misconduct and Illegal Practices at Kaplan Schools (2017). All similarities to those memoranda, both with regard to the legal substance therein and the formatting of issues and student

II. Veterans and Servicemembers' Complaints

Veterans Education Success received complaints from 113 veterans and servicemembers,³¹ which fall into the following broad categories:

Complaint Subject	Percentage
A. Accreditation and Transferability of	
Credits	28%
B. Quality of Education	17%
C. Student Loans	17%
D. Recruiting/Marketing	15%
E. Program Costs	14%
F. Post-Graduation Job Opportunities	13%
G. Veteran-Specific Problems	12%
H. Release of Transcripts	6%
I. Change in Degree Plan/Requirements	3%

A. Accreditation and Transferability of Credits

Of the 113 veterans and servicemembers who have contacted VES about Ashford University, more have complained about issues related to accreditation and transferability of credits than any other issue. 32 Many have described learning after taking classes at Ashford that other schools did not accept Ashford credits. A number say that this was contrary to what Ashford officials told them. Some describe completing an Ashford program only to learn that they would not be able to enter their desired profession because Ashford's program was not accredited. Many describe how they spent time, benefits, and money on courses and programs that were ultimately worthless. Such complaints include the following:

- "Was told credits would not transfer." J.L.
- "Biggest issue is transfer of credits. I wasted 2 years of benefits." J.K.
- "They lied about being able to transfer credits. I am in process of registering at a real college and was told that all credits earned in my 8 months with Ashford aren't transferable and the school was not accredited even though I was told by Ashford that it was. Now I owe money for 8 months of nothing." S.S.

complaints, are a credit to the work of the law students who composed those memoranda: James Brewer, Joshua Wilson, Kayla O'Leary and Caroline Blake.

³¹ In compiling complaints received by VES for this memorandum, except where indicated by brackets, the only changes that the author made to these submissions was by capitalizing the beginning of entries and sentences as needed, adding periods to the ends of sentences and entries as needed, and adding ellipses where appropriate.

³² Some veterans who contacted VES have used words such as "accreditation" in describing issues that, instead, sound like ones concerning transferability of credits or, perhaps, programmatic accreditation. Ashford, however, has always been institutionally accredited, whether by HLC or WSCUC.

- "I went to school at Ashford University back in 2013 and I felt mislead while at this school. The amount of money I put out and not getting accredited for my grades to transfer to another school. I feel used and would like to be paid back for what I loss and get my credits to transfer." D.D.
- "My credits aren't worth anything to transfer to another school." B.S.
- "I'm concerned that my credits aren't accepted in mainstream colleges." M.F.
- "Some of the credits I tried to transfer didn't and was a waste of my TA in the Marines."
 S.T.
- "I got my AA from Ashford university and then when I went back for my bachelors I had 3 classes left and I asked to take a break while I moved from the west coast to the east coast. They wouldn't give it to me and then when I failed my class the dropped me as a student. So I went to another school and none of my credits transferred." S.H.
- "I was looking to transfer to another school, and found out that they can't accept credits from Ashford." M.W.
- "I was promised and assured that my credits would transfer but when I switched schools, none of them transferred." K.H.
- "My credits were not transferable so I had to enroll another for-profit school." D.S.
- "They also led me to believe that I could take my credits and transfer them to any other college. Yet El Paso Community College would not take them." P.J.
- "One of my main concerns with Ashford was of if their credits were transferable. When I asked if my credits can be transferred to other colleges they said they would. After I got my bachelors, I applied at Capella University to try to get my Masters. When I tried to give them my credits from Ashford, none of them would transfer...they said they would not take them. Not it's like I starting over and am taking 23 classes that are over \$1700 each." J.C.
- "I was told by the recruiters of Ashford university that my credits would transfer and be recognized. They were complete liars . . ." J.S.
- "When I first enrolled I was told a lot of my credit would transfer that was not the case."
 J.S.
- "I went to this school while I was deployed to Iraq. They said my credits would transfer anywhere. . . . I'm stuck spending more money to retake additional classes to make up lost credits. This is huge reason why vets have hard time finishing school. They work hard to finish it and lose credits we earned. Not cool at all, should be ashamed of themselves." J.R.

- "I called the school based on a recommendation of someone that I worked with. I would have never started attending had I known that the accreditation the school has is pretty much worthless when trying to transfer any earned credits to another university. It makes all of the time I've spent studying, and all of the money that I've spent, a waste of my time and resources." D.H.
- "I was told that some of my credits that I took at the community college I attended would transfer into the core classes of my degree. They did. But however, not until two classes before I was to graduate was I told that those classes that transferred into some of the core classes were not going to be counted as upper division classes because they came from a community college. Ashford ended up requiring me to take an additional three classes to make up those upper division credits. During my time at Ashford, I kept noticing that the numbers were different for credits taken and credits needed and how they did not line up. I spoke to academic advisor after academic advisor concerning the discrepancy asking them if they could explain it to me. They all kept telling me that everything is fine and I will graduate on time. Nope." K.M.
- "While attending to complete my BA in psychology, we learned of several professional organizations/groups that are important for psychologists to belong to. The groups were listed in our text, and discussed in the course. However, those groups did not recognize or accept Ashford students. The degree I had was pretty much useless to attend any further education." N.P.
- "I was recruited from an online survey. The school offered me a Military discount and I also applied for grants and loans. I completed about 5 classes before discovering that the school was not accredited. I have approx 15k in loans and nothing to show for it." D.L.
- "I attended Ashford University in 2011. After finding out that the accreditation of the University was to be changed, and my credits would not transfer, I stopped attending the school. I feel cheated and like it was a waste of my time and energy going to a for-profit institution with no real benefit." J.H.
- "I took a years worth of courses, none of which count towards any degree outside of Ashford. Even if I finished a degree there, no one will recognize the degree." T.A.
- "I am still enrolled in classes there because I cannot transfer this far along and have my credits count. I am piling up loan debt for degrees that I cannot use and credits that are kind of worthless." M.Z.
- "I went to Ashford university while serving in the military overseas. I was told that graduating with an Early Childhood degree would make me a certified teacher. It did not. I had to go through another university and utilize student loans before eventually learning of the alternate teacher certification program." S.C.

B. Quality of Education

Ashford says that its mission is to provide a high-quality education.³³ That, however, does not match what veterans and servicemembers who attended Ashford report to VES. For example, such students have said the following:

- "The quality of the classes were poor and it took barely an effort to receive an 'A'. Nothing I learned actually assisted me in my work although I was a Business major working in a related field." J.P.
- "I finished a degree but to be honest, I don't feel like I learned much. You could tell based
 on how some people responded to the discussion board questions and the teachers
 comments to them that the 'professors' really didn't care what kind of work you've done."

 J.A.
- "I also feel for the amount of tuition the education I was receiving was not worth it. The [courses] are only five weeks long and I don't feel that is long enough to absorb everything that needs to be learned for a bachelor's degree in Psychology." J.E.
- "The majority of the class failed the class because the lack of support by the teacher and school." D.H.
- "The quality of education is not equivalent to 'brick and mortar' universities." S.P.
- "I have been in class with other military where that person would make posts with massive amounts of spelling errors or grammar errors and I talk to them in the next class to find out they got a high grade in the previous class that they made all the errors in." D.F.

C. Student Loans

Many veterans and servicemembers report that, despite having military educational benefits, Ashford advised them to take out student loans or took out loans on their behalf. Many of those veterans and servicemembers report being confused about why Ashford did this, and also report having large amounts of student loan debt as a result. Some also allege Ashford promised them a special "military grant" that never arrived. Such complaints include the following:

- "I was told that with their tuition break and my gi bill I would have no out of pocket expenses and each time a new semester came around I needed more money and was told a student loan was the best way to do it." M.C.
- "The cost of tuition for this school was much greater than they recruited me for, then there were student loans taken out. They said financial aid needed to be a second form of

³³ See https://www.ashford.edu/about (stating "The mission of Ashford University is to provide high-quality, accessible, affordable, innovative educational programs that meet the diverse needs of individuals pursuing advancement in their lives, professions, and communities.").

payment, however, because of my military status and benefits it wouldn't be used." – B.D.

- "I was signed up for loans I did not know about when my GI Bill ran out." D.S.
- "I was promised a military grant that would pay over 25% of my tuition and fees. Now I'm overwhelmed with loan debt because that grant was only 5%. So many lies and it's hard to contact someone once you've got in. They don't want to discuss anything." N.G.
- "I feel that Ashford cost for online classes and the amount of money they used for my degree over the two years was ridiculous. They used my post 9/11, grants and student loans to pay for my tuition." J.E.
- "I was referred by a friend who attended Ashford. Everything seemed to sound great initially, however I was told in order to start classes I would need to apply for student aid while my GI Bill processed. I was told that this to only enable me to start class right away and that there would be a hold on the loan and the money wouldn't be touched. Unfortunately that is not what happened, as soon as the funds became available Ashford withdrew the loan to pay for my classes. I had never planned on using student loans, I had thought that with my gi-bill I wouldn't have to worry about loans piling up." J.J.
- "While signing up for the GI Bill I was under the impression that I was signing up for grants or money that was to accompany the GI Bill for recipients. Now that I have over \$40k in student loans, I feel like I was left holding the bag. My credit has taken a hit. . ."

 C.R.
- "The school continuously maxed me out on student loans every semester even though I got GI bill . . . Now not only do I have 2 degrees that are almost practically useless but i am over 70K in debt, running out of GI bill money, attempting to get my lPK-3 teaching licensure classes complete and work towards a doctoral program and I just can't afford this financial[ly]. I am disabled and retired from the Military I have no idea how I am going to be able to afford to repay these loans on a fixed income if I cant get a job with the degrees I worked for over 7 years to earn. Its super depressing and frustrating." S.K.
- "I enrolled in Ashford University which is a for-profit school, in 2010. I am a disabled veteran and had my schooling completely paid for, however, I still had to fill out federal loan papers. After having an extreme emotional hardship, I dropped out of school after a year. I simply could not focus on school and family issues. I then received two checks in the mail totaling approximately 10,000. I called the school and they said to just go ahead and cash the checks. Every month I would receive a small check of over-payment from the GI Bill, so I figured it was the remaining amount after dropping out of school. I do remember cashing the one check, but not the other. I always wondered why I even had to fill out loan papers if my schooling was completely paid for?

I have been dealing with this for 5 years. I have sent many correspondence with nothing in return. It has completely ruined my credit. I have a family of 5 and are unable to now

get a safe car because of my credit. I finally recently received a letter stating that my loan is now in default and the funds to pay off loan will be taken out of my federal and state tax returns." – K.S.

• "Also I had the post 9-11 GI Bill that went straight to the school. Even still they continued to send student loan after student loan. I am not sure what my GI Bill paid for, however I have about 60k in student loans now." – V.C.

D. Ashford Recruiting and Marketing

Along with complaints included above, veterans and servicemembers have made the following complaints about aggressive Ashford recruiting and marketing.

- "I'm not really sure how Ashford got my name but they called me repeatedly. I finally signed up for classes." J.A.
- "They were very pushy, and made promises about job placement service, which never happened." K.W.
- "I was told that with their tuition break and my gi bill I would have no out of pocket expenses and each time a new semester came around I needed more money and was told a student loan was the best way to do it." M.C.
- "Ashford advertises that they are a traditional university founded in the 1800's and are highly reputable. In reality there online classes operated like a for profit school and there degree is as frowned upon as DeVry or Phoenix." J.P.

E. Program Costs

Many veterans and servicemembers report that the price of an Ashford education is far too expensive, particularly considering what they received in return and what should have been covered by their military educational benefits. Some such students also indicate that Ashford is not honest about the cost of its education. For example, Ashford students reported the following:

- "The cost of tuition for this school was much greater than they recruited me for . . ." B.D.
- "They lied about the costs. . . . The tuition and fees were outrageous. . . . So many lies . . . " N.G.
- "I feel that Ashford cost for online classes and the amount of money they used for my degree over the two years was ridiculous. . . . I also feel for the amount of tuition the education I was receiving was not worth it."— J.E.
- "Cost was expensive. Education quality wasn't enough to pursue employment." C.M.

- "I feel the tuition they charged me was very high." P.J.
- "The cost of the program versus the ability and quality of education." J.L.
- "I found Ashford after a year, yes an entire 12 months, of researching schools. . . . I did not realize that Ashford would be so expensive. I had to tap into my GI Bill to finish my masters. I now will not have enough money left to complete my PhD." J.H.
- "I started at Ashford in August 2010, and graduated June 2013. I couldn't believe the amount of tuition and [that] was even with their 'military grant'! I've been actively looking for a job since graduation. Granted my husband's career is not a positive factor in my job search with the amount of moving required, but I've seen others with my same degree from other more reputable institutions find employment with little difficulty. I have heard the jokes about a degree from Ashford, but I can assure you my student debt is no joke!" W.D.

F. Post-Graduation Job Opportunities

The Career Services page of Ashford's website says, "As an Ashford University student or alumnus, you are given every resource you can use to navigate the challenges of today's job market."³⁴ Yet many veterans and servicemembers who contacted VES described great difficulty obtaining employment after attending Ashford. Such complaints include the following:

- "I had a hard time getting a job after graduating even with Ashford telling me they provided job assistance." E.A.
- "Since I've graduated, I've worked several jobs but having this 'degree' from Ashford has never been seen as an advantage by an employer." J.A.
- "Degree seems to be useless." J.O.
- "I have not been able to get a job in my field." D.S.
- "I completed 4 years making good grades. After completing my fourth year I applied for many jobs on my own with no help from Ashford and didn't get any callback. I went to job fairs with no luck. I am working in an unrelated field because the loan amount is costing me 700 a month. I have given up hope and I feel like I wasted 4 years and all that money for a useless paper that hangs on my wall." A.M.
- "After graduation I was told my degree wasn't suitable for any employment within the I.T field and multiple companies with business positions did not see my MBA as a creditable MBA." R.D.
- "Can't seem to use my degree anywhere." A.B.

³⁴ https://www.ashford.edu/online-learning-experience/student-support/career-services.

11

- "I was told that the education provided would help me in attaining employment in the degree field. After graduation with an MBA I applied for many positions using the newly gained education as required by many employers. I received not one job offer or even an interview. I had a strong employment record. I did call and asked two different hiring companies what else I could do or put on my resume to receive an invite for an interview. I was told that I did not have the required education as on-line schools are not acknowledged as a real school for educational purposes." T.D.
- "I found out my education with Ashford University is not considered a quality education by most empolyers. I didn't realize how disregarded this degree would be until I couldn't find a job." R.D.
- "I attended Ashford online for about 6-10 months while I was overseas and stateside. I was going for my degree in criminal justice. When I first looked into the school I was told that once I get my degree it will be accepted by all employers. Well that was a lie. . . . What makes it worse is that I'm a disabled veteran and was attending college to further my education to better myself." P.J.
- "I was told it was an acredited school with high outputs of career potential with their degrees, and this was not so." B.S.
- "I've gotten my resume updated numerous times, I've applied to well over 100 jobs, and years later I still don't have a job in my field." C.R.

G. Veteran-Specific Problems

Veterans and servicemembers report that Ashford recruited them by offering military discounts. A number also report that Ashford failed to provide them with a counselor knowledgeable about their military benefits. If so, this would violate the memorandum of understanding that Ashford has with the Department of Defense, in which has Ashford agreed to have a point of contact or office for academic and financial advising that has a basic understanding of military education benefits.³⁵ Such complaints include the following:

• "During the last complaint I filed, I was told that the 'VA Rep' at Ashford who initially signed me up, wasn't a VA Rep, just one of their normal salespeople who had no idea how the GI Bill works. Further, I found out that if a real VA Rep would've helped me in the first place, they would've scheduled my curriculum to where I would've got my housing allowance until the end. I fell behind on my bills, my grades suffered because I had to get a full-time job, and was still taking full time classes. I've made numerous complaints, and all I get is an admission that they're wrong, but nothing else. They got paid their portion of my GI Bill because I had to finish the curriculum, but I was left to struggle because they told me false information when I signed up with them." – P.M.

12

-

³⁵ Department of Defense Instruction 1322.25, Appendix to Enclosure 3, *available at* https://www.dodmou.com/Documents/DODMOU%203%20SAMPLE%20July_7_2014.pdf.

- "While I was in school, submitting my VA paperwork was impossible. I started out with tuition assistance and then switched over to my GI Bill. Since the school was confused on what was going on, I had to take a loan out to stay in school until they figured out what needed to happen . . ." E.A.
- "Ashford University misled me on the tuition that would be covered with my tuition assistance from the military. I ended up taking out student loans to cover the amount of my tuition that the military didn't cover." M.P.
- "I have also asked for some help with my homework or ask for some time for extensions due to my PTSD issues and I was denied." B.P
- "I was looking for a school that meet my active duty lifestyle and Ashford call was like a godsend with promises on how life will be different once I get a college degree. In 2012 I was enrolled in the graduate program. Soon after I received notice for deployment I call Ashford let them know so that I can drop all the courses I was taking, I was told not to panic they work with military all the time simply fill out a drop slip I did, came back from deployment I have Fs in all 3 courses call Ashford back they told me I should have called first, when I told them I did and was instructed by them to fill out the dropped slip all I have is a sorry and \$11,000 student loans bills." R.J.
- "I have paid out of pocket for a lot of my degree because they cannot seem to work with our benefits like they said they could/would. I was using the GI Bill but they messed it up causing me to be sent to collections..." D.F.
- "Was using tuition assistance through the army and it ran out and they enrolled me in another class without telling me that I was out of tuition assistance and ended up using financial aid that I did not want to use it now they say I hold them close to \$800 for the class that was not paid for." R.G.
- "I believe I use too much of my tuition assistance benefits to pay for a bachelor's degree which is not worth nearly as much has a similar degree from a non profit school." F.C.
- "Last year I dropped all my classes due to my deployment and they charged Dept of Education 3600 dollars in student loans that I am now responsible for. I've been charged before for dropping a course (in a timely manner) for military reasons! I think it's ridiculous!" D.J.

H. Release of Transcripts

A number of veterans and servicemembers report that Ashford tried to force them to pay their tuition bills by withholding their transcripts. Some who completed degrees at Ashford report that they are still unable to access their transcripts and diplomas because of unpaid fees. Such complaints include the following:

- "They are not wanting to release my transcripts." S.B.
- "My student portal doesn't reflect I owe anything but I got a call from the school saying I owe nearly \$4K to them and I won't get my degree until it's paid back." S.P.
- "When i decided to transfer to University of Phoenix, Ashford would not release my transcript because they say that i owe them a balance." S.W.
- "Wont release student records" B.C.
- "Now I can't go to any school cause my transcripts will not be released until I pay Ashford \$900 I don't have." C.W.
- "...I then attempted to get my transcript so that I may continue my degree pursuit with another school to which I was told I would have no access to my transcript until the debt was paid off" J.A.
- "I was hired for a job and I requested my school transcripts to be sent to my employer. The school sent me a letter saying they [won't] release my transcripts because I owe money for that one class. I told the employer the school [won't] release them to me and the employer hired someone else. It cost me a \$35,000 a year job. . . . Because couldn't produce transcripts it took me five years to find a job that would hire me. I'm a disabled vet that has a handicap in the work place." C.L.

I. Change in Degree Plans/Requirements for Graduation

Veterans and servicemembers have also reported to VES that Ashford changed degree requirements, prolonging the time it took them to complete their degrees and driving up their tuition costs. Examples of such complaints include the following:

- "It seemed that the requirements for a specific degree plan would change requiring different and additional coursework extending my course load and debt!" C.M.
- "I was under the impression I will get a bachelors in Adult Development. After I was enrolled in the school for about a year, I have found out that that degree no longer exists. They didn't even inform me about it not being around anymore." B.P
- "Ashford kept adding class requirements after already enrolled in the degree program. They raise class fees all the time and forced us to pay for e-books even if we did not want them." S.D.
- "When I went into the program at Ashford University I was going for a social science with a concentration in education, which I was led to believe was a teaching degree and I would be able to become a teacher. The program is no longer available and even on my diploma is only states social science. The degree itself if not enough to help get one a teaching position With a degree that does not allow me to be a teacher." V.C.

III. Conclusion

The complaints recounted in this memorandum raise serious concerns about Ashford's practices and the way Ashford treats veterans and servicemembers. Although Ashford claims to provide high-quality, accessible, affordable, innovative educational programs, and to particularly serve servicemembers and veterans, those who have contacted VES report otherwise. On the contrary, they report that an Ashford education is overpriced and of low quality, that they were often pushed to take out student loans despite their eligibility for military education benefits, that Ashford employees were often unfamiliar with such benefits, that Ashford is not honest about whether other schools will accept their credits, and that an Ashford degree often does not lead to employment.

Often, these veterans describe practices that constitute potential violations of state and/or federal law, and call for attention from the Department of Education, the Department of Veterans Affairs, the Federal Trade Commission, the Department of Defense, the Department of Justice, the Consumer Financial Protection Bureau, and state attorneys general.