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Is Trident University A Good Choice For Military-Connected Students?

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Summary

Trident, a University that focuses heavily on recruiting military-connected students, has a mixed record. Its outcomes are better than Ashford's, another for-profit school that is exclusively online, and the proportion of Trident students with federal student loans is much lower than that of two other for-profit schools that also have a significant number of military-connected students. In 2017, however, VES became aware that Trident had used misleading information to recruit "survivors" who have Post-9/11 GI Bill benefits. Survivors are the children of a father or mother who was killed while on active duty and their widows or husbands.

Trident's actions are concerning in light of the following findings from our research:

- Six members of Trident's leadership team previously worked at predatory for-profit schools with a history of misleading advertising and recruiting, including Corinthian and Education Management Corporation. By statute, schools that use misleading advertising, sales, and enrollment practices are prohibited from participating in the GI Bill.
- Although Trident touts its gold-standard, "regional accreditation," its actions several years ago placed that accreditation at risk and the school was placed on probation. Once the probation was rescinded, the accreditor noted that Trident had work to do in (1) improving retention and graduation rates, and (2) putting in place enhanced student services and assessing their effectiveness. A 2012 Senate Committee investigation of for-profit schools also found that Trident had poor retention rates. Trident is scheduled to be reviewed by its accreditor again in 2018/2019.
- Complaints about Trident that veterans shared with VES focused on the poor quality of education, financial issues, accreditation, and post-graduation job opportunities, issues that may be related to misrepresentation during recruiting. The 2012 Senate Committee investigation also found that Trident invested little in instruction considering the extent of its profits.

Trident Is Targeting “Survivors”

Each December, [Snowball Express](#) sponsors an event for the children of military servicemembers killed while on active duty since 9/11. The 4 days are filled with fun activities, like sporting, dances, and amusement park visits. For some survivors the loss is recent and the idea behind the event is to provide solace and cheer to individuals who are grieving.

Because these children (and any surviving parent) are eligible for Post-9/11 educational benefits, the Tragedy Assistance Program for Survivors (TAPS) hosts three sessions at Snowball Express on the ins-and-outs of using their benefits.¹ TAPS is a Veterans Service Organization that represents the interests of survivors. Prior to 2017, no school had attended or hosted a session on this topic. Last year, however, Trident University was added to the December program, replacing a TAPS planned session. The President of the institution spoke on behalf of Trident. Trident staff barred TAPS from this session, but we interviewed Malia Fry, who they allowed to attend. The widow of the Fry Scholarship namesake, her Congressional testimony about the lack of GI Bill benefits for survivors of the fallen led to enactment of the Fry Scholarship. Several of her children are now attending college on Fry Scholarships.

According to our interview with Malia Fry, Trident turned their access to survivors into a recruiting opportunity, offering \$500 discounts to any survivor who signed up within 3 weeks (they were also encouraged to sign up on the spot). VES was told that some attendees may have done so. Instead of providing information about using the Post-9/11 GI Bill, the event was “all about Trident.” Moreover, the advice they offered was right out of the for-profit school recruiting playbook, which is well known for misrepresentation. Comments allegedly made during the presentation include:

- The GI Bill covers everything and we’ll handle all the paperwork for you but go to [“scholarship.com”](#) for information about available aid.²
- You only need to apply to one or two colleges and one of them should be Trident.
- If you apply to a college and don’t get in, come to Trident.
- It doesn’t matter where you get your undergraduate degree—employers and graduate schools don’t care.
- You can transfer your Trident credits to any college.

¹The eligibility of survivors for the Post-9/11 GI Bill is known as the [“Fry Scholarship.”](#) It is named in honor of Marine Gunnery Sergeant John D. Fry who was killed in Iraq and left a widow with three small children.

²Although this website appears to be well regarded, Tragedy Assistance Program for Survivors (TAPS) has its own scholarships database, which it carefully vets. TAPS is a Veterans Service Organization that represents the interests of survivors.

- You can earn a Bachelor's degree and then go on to earn a PhD entirely online. When challenged that some doctoral programs require "clinicals," Trident repeated that everything could be done online.

Malia Fry was particularly incensed by the fact that about 30 of the attendees at the Trident presentation were between 19 and 21-years old and were at Snowball Express for training so that eventually its programs can be staffed by survivors. Trident, she said, was blatantly trying to recruit these young men and women by touting the advantages of a fully-online education. For example, the presenter emphasized that Trident students could sleep-in during the morning if they wanted to and take classes anytime, even at midnight.

Enrollment

VES analysis shows that veterans and family members using the GI Bill and active duty military using Defense Department (DOD) Tuition Assistance comprise a significant proportion of Trident enrollment—64 percent for 2017, an increase of 9 percentage points from 2016 (see table 1).³ Enrollment consists of any student who registered over a 12-month period. Although not strictly comparable, the 2012 Senate Health, Education, Labor, and Pensions (HELP) Committee [profile](#) of Trident, which provided Fall 2010 enrollment, suggests that military-connected student enrollment has declined over the past 7 years. In the Fall of 2010, about 80 percent of Trident’s students were military personnel or veterans.

Table 1: Trident Military-connected, 12-Month Student Enrollment

Time period	Veterans ^a	Military personnel ^b	Subtotal “military” students	Total student enrollment ^c	Percent “military” students
2016	2,874	3,610	6,484	11,700	55 percent
2017	2,229	4,833	7,062	11,057	64 percent

Sources: See table notes.

Note. Federal databases don’t consistently report data on overall and military-connected student enrollment. VA and DOD report 12-month enrollment—every student who enrolled, including those who graduated or dropped out. In contrast, ED’s College Navigator website (IPEDS data) reports enrollment at a point in time, currently Fall 2016, which is always lower than 12-month enrollment. Twelve-month enrollment data, however, is available to researchers. To ensure apples-to-apples comparisons across databases, this summary reports IPEDS 12-month enrollment for Trident. Trident [reported](#) total enrollment in its undergraduate and postgraduate programs of 10,794 in FY 2016 (see separate student profiles for each of its degree programs). This data would appear to be for 12-month enrollment.

^aVAs GI Bill [Comparison tool](#).

^bDOD [Tuition Decide](#).

^cVES analysis of Integrated Postsecondary Student Data System.

For several years IPEDS has also required schools to report the number of veterans and military personnel using the Post-9/11 GI Bill and Tuition Assistance, respectively. The [data](#) reported by Trident are inconsistent with data reported by federal agencies (table 2) and show significantly higher military-connected enrollment. For example, Trident indicated that it enrolled 9,920 Post-9/11 veterans and 12,468 active-duty military during academic year 2015-16 for a total of 22,388 military-connected students.⁴ And yet, the same page of College Navigator indicates that Trident enrolled 6,984 undergraduate and graduate students in the Fall of 2016, raising a

³VA, DOD, and ED measure the enrollment time period slightly differently, e.g. calendar, fiscal, or academic year, respectively. Although no enrollment data was available, Trident also serves military spouses who are eligible for the Military Spouse Career Advancement Account (MyCAA) Scholarship program. MyCAA provides up to \$4,000 of tuition assistance. The Senate HELP Committee found that nearly 60 percent of MyCAA funds went to for-profit colleges, including an online “animal behavior” college that was one of the top recipients.

⁴Post-9/11 enrollment excludes veterans and family members using other existing benefit programs—about 11 percent in FY 2016.

question about the accuracy of the military-connected enrollment data that Trident reported through IPEDS.

Trident's [website](#) warns prospective students living in Minnesota and Oregon that it is not authorized to enroll any new students residing in those states. Likewise, there are restrictions on its ability to enroll any new students from Georgia. The reason for these restrictions is unclear.

Marketing

As is evidenced by its military-connected enrollment, Trident's niche market is active duty servicemembers and veterans. Its [key marketing messages](#) are (1) reduced tuition rates and grants, (2) "exceptional" military support services, (3) 100 percent online education, (4) gold standard regional accreditation, and (5) academic excellence. Trident touts its "vast alumni network," which includes more than 22,000 military alumni, as a factor that "further increases your chances of career success." Finally, Trident underscores its military orientation by noting that its Board of Trustees is comprised of "strong military, academic, and business leaders." Three of its seven board members are retired military.

"[Indeed](#)" and "[Glass Door](#)" include some negative reviews of Trident that suggest it prioritizes marketing over providing a quality education: (1) "Unless you sign up a lot of people, I can imagine there is little job stability here" (2) "This place is more interested in making money than educating students." (3) "They accept them into the school even when they do not meet requirements and have no hope of ever graduating." (4) "We are supposed to focus on student success but end up turning them into numbers for sales."

Trident relies on [lead generators](#) to recruit students.⁵ Trident was ranked as one of the five best fully online schools in 2017-18 by "[Online Colleges](#)," which serves as a lead generator for for-profit schools.⁶ Apparently, Online Colleges is owned by QuinStreet, which reached a [settlement](#) with more than a dozen state Attorneys General in 2012 over allegations "that its sites aimed at current and former members of the military were deceptive." Moreover, QuinStreet had to relinquish use of its GI Bill.com website and pay a \$2.5 million fine as part of a [settlement](#) with state Attorneys General. VA subsequently had the term trademarked. The Attorneys General press release about the settlement noted:

This multi-state enforcement action is a result of the states' ongoing investigations of the deceptive recruiting and marketing practices of some for-profit schools. The states alleged that QuinStreet violated their consumer protection laws in the course of operating websites that generate leads primarily for the for-profit education industry. The states reported that several of the company's sites targeting military service members, including GI Bill.com, were deceptive and misleading in giving the appearance of being operated, owned or endorsed by the U.S. government or military. The states also alleged that the sites that listed schools as "eligible GI Bill Schools" were misleading in giving the impression that the schools were the only schools at which the military education benefits could be utilized. In fact, the lists consisted only of QuinStreet clients that were primarily for-profit schools.

⁵According to the Federal Trade Commission, lead generation is the process of identifying and cultivating individual consumers who are potentially interested in purchasing a product or service. The goal of lead generation is to connect companies with those consumers so that they can convert "leads" into sales.

⁶As noted subsequently, [Online College Plan](#), a different website, does not recommend Trident.

Operations

The 2012 Senate HELP Committee report profiled 30 for-profit schools, including Trident.⁷ Half of the profiled schools were publicly traded and half, including Trident, were privately owned. The Committee's [Trident profile](#) contains a brief history of the school, which was created when the online division of a New York-based non-profit (Touro College) was purchased by a private equity firm in 2007. According to the profile, Trident's marketing expenditures were less than half (7.9 percent of revenue) as much as the 15 other publicly traded schools studied. However, the 33 percent of revenue allocated to profit was the highest of the 30-profiled companies and the \$1,118 per pupil spent on instruction was among the lowest. Other findings included:

- Trident's tuition is lower than most of the for-profit companies examined by the committee, largely because the company sets its tuition to closely match Tuition Assistance benefits from the Department of Defense.
- Trident spent \$494 per student on recruitment, \$2,084 on profit, and \$1,118 on instruction in 2009.
- Trident's annual expenditures of \$1,118 per pupil on instruction in 2009 were significantly lower than those of the University of California-Irvine (\$15,039) and the University of Southern California (\$35,920).
- It employed 17 recruiters and 16 student services staff (tutoring, remedial services, and career counseling and placement) in 2010; the number of student services employees was still sparse for its 7,307 students that year (Fall 2010 enrollment).
- About 51 percent of Bachelor's degree students who enrolled in 2008-09 had withdrawn by 2010, slightly lower than the sector-wide rate of 54.3% for the 30 schools examined.
- Trident's 1.9 percent default rate by 2010 for student entering repayment in 2008-09 was one of the lowest of the 30 schools examined, but most of its revenue came from DOD Tuition Assistance (64 percent), not federal student aid (12 percent).
- 74 percent of Trident's faculty was employed part time, close to the 80 percent average for the 30 schools examined.
- In 2011, Trident was notified that it risked losing its accreditation for failing to meet standards related to defining and achieving educational objectives but had made progress in meeting those standards by 2012 and was placed on probation.

Also relevant to an examination of Trident is its 2015 partnership with Jones International University, another for-profit, online school that announced its planned closure 3 years ago. Jones chose to [partner](#) with Trident "because of its similar approach to student well-being and courses offered." Trident's tuition, however, is significantly lower than that of Jones International University. Trident also had a [teach-out agreement](#) with the International Career

⁷See U.S. Senate [HELP](#) Committee, "For-Profit Higher Education: The Failure to Safeguard the Federal Investment and Ensure Student Success, July 30, 2012.

Development Center (ICDC) College, which announced its closure in May 2016. A website that focuses on [online education](#) describes the teach-out agreement and raises questions about the value of ICDC degrees and, by association, those of Trident University. Trident is not included in Online College Plan’s top [100 best online schools](#). As is discussed below, quality of education was the single largest problem cited by military-connected students in the VES complaints database.

As shown in Table 2, seven of Trident’s “leadership team” worked at or were associated with several publicly traded for-profit colleges, including Ashford, Argosy (EDMC), Phoenix, Capella, and Corinthian (in particular it’s Heald College division, which Corinthian purchased in 2010). All but Capella have been investigated for deceptive marketing. [EDMC](#), the owner of Argosy, settled a lawsuit with the Colorado AG in 2013 for misleading advertising and recruiting. The [Department of Education](#) fined Corinthian \$30 million in April 2015 after it confirmed cases of misrepresentation of job placement rates to current and prospective students in Corinthian’s Heald College System. Corinthian declared bankruptcy and closed shortly thereafter. The University of Phoenix’s use of Phoenix-branded military challenge coins as a recruiting tool and the sponsorship of events on military bases to recruit servicemembers were the subject of a 2015 [investigative report](#). Its actions contravened an Executive Order which banned such recruiting activities. DOD temporarily suspended new enrollment by Phoenix and the school stopped using its challenge coins, which suggested that the school was endorsed by the military services. The California Attorney General filed a lawsuit against [Ashford](#) in December 2017 alleging, among other things, that the school misrepresented employment prospects.

Table 2: Prior For-Profit School Affiliations of Current Trident Leadership

Title	Name	Prior affiliations
Administrative		
President, CEO	Travis Allen	Vice Chancellor of Operations, Argosy ; ^a Director of Enrollment, Campus Director, and faculty member at University of Phoenix ; BA and MA from Phoenix
Chief Operating Officer	Eric Rajasalu	Senior VP for Marketing and Admissions, Heald
Provost, Chief Academic Officer	Dr. Mihaela Tanasescu	Ashford VP for academic affairs
Board of Trustees		
Chair	Dr. Karen Viechnicki	Provost at Capella University
Vice Chairman	Nolan A. Miura	Senior VP, Strategic Planning and Business Development, Corinthian ; former President/CEO of Trident
Managing Director	C.J. Fitzgerald	Managing Director, Summit Partner’s Menlo Park office; Board of Directors, Heald College , and apparently was involved in its sale to Corinthian ^b
Board Member	Stan D. Phillips	Oversaw Marketing and Admissions, Heald and held various management position at Corinthian

Source: Trident leadership webpage and google searches.

^aArgogy was a brand operated by the Education Management Corporation, which sold its schools to the nonprofit Dream Center in 2017.

^bSummit was involved in the purchase of nonprofit Tuoro College in 2007, which became Trident and converted to for-profit status.

Trident has been on the Department's list of institutions subject to Heightened Cash Monitoring 1 since at least [March 2015](#). Because its [composite score](#) is less than 1 (-0.2), the Department does not consider Trident to be financially responsible. As a result, the school is subject to cash monitoring and was required to post a [\\$4.3 million](#) letter of credit in May 2015—25 percent of the Title IV aid it received during its most recently completed fiscal year. As discussed below, only 14 percent of Trident's students took out federal loans in 2016, a surprisingly low proportion considering that the rates at ECPI and the American Public University System, which also heavily recruit military-connected students, are 52 percent and 30 percent respectively.

Accreditation

Trident University has been regionally accredited by WASCUC—Western Association of Schools and Colleges, Senior Colleges and University Commission—since 2005. WASCUC’s accreditation actions and any correspondence with schools are posted on its website.

According to the WASCUC website, its most recent accreditation action with respect to Trident occurred on Feb. 22, 2013, when it considered the team report from a Nov. 2012 onsite review of the institution. Based on this team report, WASCUC removed its probation of Trident and reaffirmed its institutional accreditation. Trident’s probation dated from 2011 when WASCUC received information that Trident awarded Bachelor’s degrees to students who had not fulfilled the University’s General Education requirements.⁸ Moreover, Trident had failed to notify WASCUC when this issue was brought to the school’s attention by an organization that works with the U.S. Navy to assure that the colleges attended by naval personnel are appropriately accredited and military friendly. This “serious” breach of WASCUC standards resulted in the imposition of an “Order to Show Cause” as to why Trident’s accreditation should not be terminated as of March 30, 2012. The Show-Cause Order was rescinded in March 2012 and replaced with a probation after a Nov. 2011 inspection found that Trident had made significant progress in addressing deficiencies in 10 areas.

The Feb. 2013 letter also indicated that the next WASCUC offsite visit would occur in Fall 2018 to be followed by an onsite visit a year later. However, WASCUC asked Trident to submit an interim report by March 1, 2015 on the progress of, among other things, (1) implementing multiyear faculty contracts, (2) improving retention and graduation rates, and (3) establishing enhanced student services and assessing their effectiveness. This interim report is not available on the WASCUC website.

Also available on Trident’s website is an institutional questionnaire that it submitted to its state regulator, the [California Bureau of Private Postsecondary Education](#) (BPPE), indicating N/A when asked if it had “specialized accreditation from a recognized Department of Education approved specialized/programmatic accreditor....” Specialized accreditation is often an indication that some degrees requires state licensure or certification. VES reviewed the degree programs that are [approved for veterans](#) and identified none that appeared to require

⁸According to the 2012 Senate HELP Committee report, the Show-Cause Order followed a March 2010 warning letter, expressing concern about Trident’s Capacity and Preparatory Review (CPR) report, a key report in WASCUC’s accreditation review process. WASCUC acknowledged that “considerable effort had been undertaken by a large number of people in support of the University’s CPR report.” Even with that effort, however, WASCUC also noted that its review team “found the report difficult to follow and lacking in reflection and supportive evidence beyond assertions.”

graduates to obtain state licensure or certification.⁹ Trident's [catalogue](#) contains appropriate disclosures that its "education" oriented degree programs do not qualify graduates to be licensed or certified as teachers or administrators.

⁹To see Trident degree programs approved for the GI Bill, click on the hyperlink and enter Trident in the search box and click on California. The annual [report](#) that Trident submits to BPPE also indicates that no certificate or degree programs require graduates to be state licensed.

Outcomes

In general, federal databases are the only source of outcome data for specific institutions. The data are reported by schools through the Integrated Postsecondary Education Data System (IPEDS) to the Department of Education and are available on College Navigator or on the College Scorecard, which draws from College Navigator. Most outcome data on the Comparison Tool and TA Decide are imported from the College Scorecard. VA, however, has been reporting veteran-specific retention rates for some schools and recently added 6-year graduation rates for undergraduates. In addition, Trident reports graduation and retention rates, which also provide veteran-specific data, but which may not be comparable to the data available on federal websites.

Federal Databases. IPEDS now reports more complete graduation rate data for each institution. Previously, schools only reported rates for first-time, full-time students, which excluded the many student who attended part time, who were not first-time students, or who transferred from another school. Graduation rates for all of these cohorts are now included. Although this data is currently available on College Navigator, the department's College Scorecard website currently only reports more limited graduation rate data for first-time, full time students.

Table 4 provides a summary of this more complete IPEDS outcome data for [Trident](#) and, for comparison purposes, [Ashford](#). Like Trident, Ashford is exclusively online and enrolls many veterans and active-duty servicemembers.¹⁰ By most measures, Trident student outcomes are more positive than those of Ashford students. For example:

- Only 15 percent of Ashford first-time/full-time students who began school in 2008 had earned a degree 6 years later compared to 45 percent of Trident students. Trident slightly exceeded the national median graduation rate for this cohort of 42 percent. According to Trident's website, however, only 1 percent of students are first time/full time.
- Although Ashford's full-time/non-first-time graduation rate was 49 percent, Trident reported its graduation rate for this cohort was 67 percent.
- Only with respect to retention rates, did Ashford best Trident. However, neither school's retention rate was laudable. Seventeen percent of Tridents full-time/first-time students enrolled for a second year, compared to 24 percent of Ashford's students.
- Sixty-eight percent of Ashford students have federal student loan debt compared to 14 percent Trident students. In contrast to Ashford, however, the majority of Trident students have VA or DOD educational benefits, which reduces their need to borrow to finance their education.
- Median debt after graduation is almost \$35,000 for Ashford students compared to \$9,500 for Trident students.

¹⁰VES issued two reports on Ashford last year, a [fact sheet](#) and a [longer report](#) examining Ashford's fight to maintain eligibility to participate in the GI Bill.

Table 3: Trident Student Outcomes from IPEDS as Reported on College Navigator

Metric	Trident outcome	Ashford outcome	National median
1 st to 2 nd year retention rate, first-time, full-time BA students	17% ^a	24%	68%
Completed degree/certificate within years after beginning in 2008			
Full time/first time	45%	15%	42%
Full time/non-first-time	67%	49%	N/A
Part time/first time	44%	N/A	N/A
Part time/non-first-time	57%	N/A	N/A
Students with federal loans	14%	68%	N/A
Median federal loan debt after graduation	\$9,500	\$34,375	N/A
3-year cohort default rate ^b	3.1%	14.9%	N/A
Paying down debt after 3 years	41%	23%	47%
Percentage earning than a high school graduate	78%	57%	N/A

Source: IPEDS (retention and graduation rates) and College Scorecard (all other metrics). National medians are from College Scorecard.

^aThe retention rate for part-time students was 24 percent.

^bEntered repayment in 2014.

Veteran-specific retention and graduation rates. VA uses its own administrative data to report veteran specific retention rates and within the past month it has begun to post graduation rate data as well. All VA data is for full-time/first-time veterans students *who are using benefits*. There is little information on VA’s website, however, about the methodology behind the data. Moreover, It is unclear how meaningful these data are given that, [according to Trident](#), only 1 percent of its students are full-time/first time. VA data show a 68 percent and 20 percent retention and graduation rate, respectively. The VA data likely includes veterans seeking both undergraduate and graduate degrees and may not be comparable to Trident’s own data which reports separately by degree program.

Trident-reported retention and graduation rates. Trident’s website provides *overall* student retention rates—“at 1 year” and “after 1 year”—for undergraduates who enrolled in FY 2015 and *overall* student graduation rates for undergraduates who started school in 2008. In addition, it breaks down these data by whether students are civilians, veterans, active duty, etc.

- *Retention rate.* Although the distinction between “at” and “after” is unclear, the difference is significant—52 percent and 17 percent, respectively for all enrolled students. Coincidentally, 17 percent is identical to the IPEDS reported retention rate, which also includes all enrolled students. For veterans the “at 1 year” retention rate was higher—65 percent. Unfortunately, Trident does not report an “after 1 year” rate for veterans, likely because it’s closer to 17 percent.
- *Graduation rate.* Trident’s overall undergraduate completion rate is 64 percent, which includes civilians as well as military-connected students and part-time/non-first-time students—similar to what is reported in IPEDS (67 percent). Surprisingly, 58 percent of undergraduates finish their degree in 4 years. Neither IPEDS or Trident report separately on completion rates for certificates versus degrees. Finally, Tridents reports that its

veteran graduation rate for students who enrolled in 2008 was 71 percent compared to a civilian graduation rate of 53 percent and an active-duty rate of 60 percent.

Job placement rates. The California Bureau of Private Postsecondary Education requires schools to submit reports that summarize outcomes, such as graduation rates, job placement, rates, and salaries by degree program. Trident's 2016 [report](#) indicates that the placement rate for all student who graduated was zero.

Complaints

Forty-six military-connected students shared their concerns about Trident University with VES.¹¹ The top issues cited were quality, cost, accreditation, and post-graduation job opportunities (see table 3). VES also prepared a separate “trend analysis” of these 46 complaints, which provides additional details about the problems they encountered. For example, the VES trends analysis provides insights into veterans’ issues concerning the quality of education provided by Trident.

A veteran who studied in a health care-related program at Trident, complained that the curriculum was “outdated and behind the time.” He continued, “[w]e were studying things from 2003 in 2012.”

He “was told that the Accounting program was similar to that of any other 4 -year college.” Yet, he “quickly realized that WAS NOT the case. My daughter is attending a 4-year college and the difference in class work was amazing. The class work she is doing is far and beyond that was being required at Trident University.”

“I was recruited by Trident University and told that my education would be on part [sic] with all other colleges.” However, he does not believe that was true.

“[t]he majority of my work that was graded had no robust feedback and with every class the feedback was generic cut and paste.”

“I don't feel like the education I received from either school will help me and it seems that they just wanted to fill the seats and receive my GI bill money.”

Although complainants only cited recruiting and marketing five times, predatory schools mislead students about most of the issues identified by the VES complainants.

Table 4: Summary of Issues at Trident University Identified by VES Complainants

Complaint issues	Number of times complainant identified issue as a problem
Quality	22
Financial (cost, tuition, fees)	21
Accreditation	17
Post-graduation job opportunities	14
Student loans	10
Release of transcripts	6
Transfer of credits	6
Recruiting/marketing	5
Change in degree plan requirements	5
Grade policy	4

¹¹The data on the GI Bill Comparison Tool (11 complaints since 2014) and TA Decide (3 complaints since FY 2015) only reveal the complaint topic cited by the complainant. The VES trends report focuses on the complaints received by VES because complainants typically include a narrative giving more details about the problems encountered.

Other	3
Refund issues	2
Total	115

Source: VES Complaints database.

Note: Each complaint can include multiple issues and often do. These 12 complaint issues are identical to those available to veterans who submit complaints to the VA and DOD.

Conclusions

Trident's focus on recruiting survivors with misleading information is disturbing. Given its leadership team's prior employment by predatory for-profit schools such as Corinthian, Argosy, and Ashford, this behavior is not surprising.

Use of misleading information in advertising, sales, and enrollment practices to recruit veterans was prohibited in 1974 by the Vietnam Era Veterans' Readjustment Assistance Act. That prohibition, as codified in the Code of Federal Regulations, [Sec. 3696](#) of Title 38, requires the Secretary of Veterans Affairs to:

“not approve the enrollment of an eligible veteran or eligible person in any course offered by an institution which utilized advertising, sales, or enrollment practices of any type which are erroneous, deceptive, or misleading either by actual statement, omission, or intimation.”

Similarly, the [Principles of Excellence](#) require schools to “prevent abusive and deceptive recruiting practices that target the recipients of Federal military and veterans' educational benefits.” Finally, both the protections embedded in Sec. 3696 and the Principles of Excellence were incorporated into the Memorandum of Understanding that schools must sign in order to participate in DOD's Tuition Assistance Program for active-duty servicemembers.