

## Affidavit of Carrie Wofford

I, Carrie Wofford, hereby attest:

1. I am the President of Veterans Education Success, a non-profit I founded in February 2013 to protect and defend the integrity and promise of the GI Bill and other federal education programs for veterans and servicemembers.
2. Before founding Veterans Education Success, I was Senior Committee Counsel on the U.S. Senate Committee on Health, Education, Labor & Pensions. Among the wide variety of issues I worked on in that role, I provide guidance to the Committee's comprehensive investigation into the abuses of the for-profit college industry as a whole, including University of Phoenix (UOP), and I led the Committee's work protecting veterans and service members from abuses by for-profit colleges like UOP.
3. I was awarded the 2012 Freedom Award, the 2012 Congressional Staffer of the year Award, and the 2012 Legislative Proponent Award for my work.
4. I received a law degree from Yale Law School in 2001 and clerked on the US Court of Appeals for the DC Circuit in 2001-2002.
5. In my current role as President of Veterans Education Success, my staff and I have communicated with thousands of veterans and servicemembers who attend and have been deceived by predatory for-profit schools. In particular, my staff and I have spoken with hundreds of former UOP students, who have come to my organization for help and to share their experiences. The following paragraphs summarize my organization's findings.
6. In my current role, four whistleblowers from UOP have approached my organization to share their concerns, primarily about UOP misleading students during recruitment and enrollment.

7. Military veterans and active-duty servicemembers are often targeted by unscrupulous for-profit education companies because, through an unfortunate loophole in the federal Higher Education Act (known as the “90/10 loophole”), for-profit companies use an accounting gimmick to count military and veterans education funds as private dollars, which the companies use to off-set the cap the companies otherwise face on the amount of federal funds they may receive. In other words, as Holly Petreaus, the former head of the Service Member Affairs at the U.S. Consumer Financial Protection Bureau, wrote in the New York Times, “For every service member or Veteran enrolled at a for-profit college and paying with military education funds, that college can enroll nine others who are using nothing but Title IV [Education Department] money. This give for-profits an incentive to see service members as nothing more than dollar signs in uniform, and to use aggressive marketing to draw them in and take out private loans.”
8. Most student who use the GI Bill and other related military benefits do not need student loans to complete their schooling. The Post-9/11 GI Bill is America’s chief way of saying thanks to men and women who have risked their lives in dangerous war zones in Iraq and Afghanistan. It is not just thanks; it is also America’s assurance that the current generation of veterans will not be homeless or reliant on public assistance; it is their ticket to a successful civilian career and the American Dream. The Post-9/11 GI Bill is a generous benefit. Indeed, the GI Bill is sufficiently funded to cover the full cost of tuition at public universities and colleges, including housing and book allowances. However, veterans and former UOP employees have told me that UOP recruiters routinely deceived veterans about the true cost of UOP’s tuition.
9. Four UOP whistleblowers, all current or former long-time senior recruiting employees, have described to my staff and me a culture hyper-focused on enrolling new students, where



recruiters practiced deceptive procedures, including lead manipulation, and were encouraged to keep in constant contact with potential students, and called people who did not want to be called, and enrolled students who were not capable of the work or who lacked access to online classes. Attached is a letter from one of the whistleblowers, a longtime senior recruiter.

10. UOP whistleblowers detailed to me and my staff how they were discouraged from giving a full and clear financial overview of the cost of attending UOP when talking to potential students, and were reprimanded for being too thorough. Recruiters allege they were discouraged from explaining to students the complete price and all the options available for financing. Additionally, a whistleblower relayed that UOP posted erroneous tuition rates on their website in the recent past regarding discounts that UOP knew did not exist, and kept those special rates up for several years even when they did not exist.
11. UOP whistleblowers stated that UOP misled ITT Tech students, when ITT closed in September 2016, into believing that if the ITT Tech students transferred to UOP, UOP would then assist the ITT Tech students in applying for “closed school discharge” of their student loans at the US Department of Education. The whistleblowers allege that UOP knew full well that ITT students would lose their right to a “closed school discharge” if they had transferred to UOP (or any other school). While it was understandable that UOP would try to poach ITT Tech students when ITT closed, the whistleblowers were very uncomfortable with UOP’s tactic of purposely deceiving the ITT students about their rights and thereby also preventing the ITT students from gaining access to their rightful “closed school discharge.”

12. UOP whistleblowers allege an aggressive military and veteran recruitment effort, with UOP recruiters on military bases and aggressively pursuing servicemembers and veterans and deceiving them.
13. UOP whistleblowers allege that UOP pressures recruiters to deceive prospective students about many key facts, including the correct tuition; the actual number of credits needed to reach a degree (including a common practice of incorrectly citing to prospects the minimum time and tuition as if the student were enrolled full-time and full-year even when the recruiter knew the prospect was asking about part-time enrollment); the degrees offered (including promising potential students that a certain degree was offered when the recruiters knew it was not); the ability of graduates to work in certain fields (including promising potential students they could work in certain licensed occupations when UOP knew that the UOP degree was insufficient to meet state licensure requirements); the typical salary (including by citing national average salaries from the Bureau of Labor Statistics and other national sources but pretending they were UOP graduates' average salaries); and the quality of education.
14. UOP whistleblowers provided to me and my staff documentation of recruiting manuals and practices, including UOP's use of "mind mapping" and "motivators," and emphasizing a career guidance system that oftentimes just linked to lists of jobs from other websites like Monster.com. They showed 2018 emails and documents that recruiters who brought in high numbers were given perks like more flexible schedules, longer lunches, and recognition from peers, as well as threats and aggressive pressure on recruiters, including that UOP managers openly enforce a monthly quota of the number of enrollments each recruiter (and each recruiting unit) must sign, as well as daily tallies of, and pressure regarding, the number of referrals (leads) each recruiter "converts" to enrollment, and that, regardless of whether the



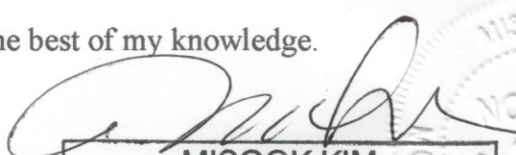
lead is qualified, if the recruiter does not meet the quota, the recruiter gets written up, including possible termination.

15. One UOP whistleblower detailed that UOP has agreed to and been charging a discounted rate for the DOD Tuition Assistance program for military students to pay for part of the cost of each enrolled courses' credit hour, while at the same time charging ED for the full credit hour price when receiving student loan payments, not the discounted price.
16. One UOP whistleblower explained that UOP enrolled students who lacked either a high school diploma or a GED.
17. UOP whistleblowers explained that recruiters are supposed to emphasize how great the UOP career guidance system is, but it is actually just a list of jobs from public sites like monster.com, and that the recruiters are supposed to promote the career assistance even when recruiters know it is nonexistent.
18. UOP whistleblowers detailed how employees were often times encouraged to enroll in courses due to the tuition being waived, and then were encouraged to take out other loans to supplement their income.
19. I am submitting this affidavit in response to the Higher Learning Commission's third-party notice to comment on University of Phoenix's ongoing accreditation.
20. Some specific details I have not shared in order to protect whistleblower identity, but if HLC wanted more information (that it could not share with UOP), we could provide it.
21. I certify that the foregoing is true and correct to the best of my knowledge.

Signed: \_\_\_\_\_

Carrie Wofford

Date: 11/2/2018

  
MISOOK KIM  
NOTARY PUBLIC  
MONTGOMERY COUNTY  
MARYLAND

EX DT: 6/19/19