

**From:** Carrie Wofford [mailto:[carrie.wofford@veteranseducationsuccess.org](mailto:carrie.wofford@veteranseducationsuccess.org)]  
**Sent:** Thursday, February 22, 2018 5:31 AM  
**To:** Jamiene S. Studley <[jstudley@wscuc.org](mailto:jstudley@wscuc.org)>  
**Subject:** Jamie, for your consideration

Attached is our letter regarding Ashford's violation of WSCUC's integrity standard.

Yesterday, the California State Approving Agency for Veterans Education denied Ashford's request for approval to serve GI Bill students (Feb. 21, 2018) (click [here](#))

The background for California's decision: On Nov. 9, 2017, VA required Ashford to seek approval from the state where its main campus/headquarters is located (California), after Ashford lost its Iowa approval when it closed its Iowa campus and after Ashford had sought to deceive VA by claiming Arizona was its main campus after quickly opening a tiny office in Arizona and conspiring with Arizona state officials to deceive VA about the nature of its "campus." (Reportedly, VA has since terminated its contract with the Arizona state agency that conspired to deceive VA.)

- Report on the issue: "[Ashford's Fight to Maintain GI Bill Access Raises Questions About the Enforcement and Adequacy of Statutory Requirements](#)" (Nov. 2017) is [here](#), and our short press release for our report is [here](#).
- *Chronicle of Higher Education* expose on Arizona agency's complicity is [here](#).
- Report on student veteran complaints, "Veteran and Servicemember Complaints About Misconduct and Illegal Practices at Ashford University" (Dec. 2017) is [here](#).
- Fact sheet, "Enrollment Trends and Student Outcomes at Ashford University" (Dec. 2017) is [here](#).
- The full history of VA - Ashford interactions, with all the documents, is available on our website at: <https://veteranseducationsuccess.org/va-activities>, under "Ashford."
- The 2012 Senate investigation analyzed internal documents and emails of Ashford's parent company, Bridgepoint, and held a hearing specifically on Ashford. The Senate findings are worth skimming: [Summary](#) [Report](#) [Hearing](#)

FYI, Ashford's troubles with federal and state law enforcement and government agencies include:

***State Attorneys General***

- 2017 lawsuit by CA attorney general alleging false or misleading statements and unfair and fraudulent business practices. (see [here](#))
- 2014 investigation by MA attorney general to determine if school was compliant with state consumer protection laws. (see [here](#))
- 2014 investigation by and settlement with IA attorney general for \$7.25 million in restitution. Agreement barred deceptive advertising and coercive recruitment and created an independent overseer. (see [here](#)) **Closed.**
- 2013 investigation by CA attorney general for making false or misleading statements on sales calls. (see [here](#)) **Went on to 2017 lawsuit referenced above.**
- 2011 investigation by NC attorney general to determine if violated state consumer protection law. (see [here](#)) **Presumably ongoing.**
- 2011 investigation by NY attorney general to determine if school violated NY state consumer protection, securities, and finance laws. (see [here](#)) **Presumably ongoing.**

#### ***U.S. Department of Justice***

- 2016 investigation regarding misstatement of Title IV refund revenue and overstatement of private fund revenue, therefore, misrepresenting its compliance with the 90/10 rule. (see [here](#)) **Presumably ongoing.**

#### ***U.S. Securities and Exchange Commission***

- 2014 investigation regarding accounting and other business practices. (see [here](#)) **Presumably ongoing.**

#### ***U.S. Consumer Financial Protection Bureau***

- 2015 investigation to determine whether company engaging in unlawful practices in advertising, marketing, or origination of private student loans. 2016 consent order found that Bridgepoint engaged in deceptive actions and ordered Bridgepoint to discharge all outstanding private loans (\$9.1 million of net outstanding loans) made by the institution to its students and pay an \$8 million penalty to CFPB. (see [here](#)) **Closed.**

#### ***U.S. Education Department***

- 2017 final audit determination found that Ashford owed the Department of Education \$0.3 million for incorrect refund calculations and refunds that were not made or were made late. Had to ensure that school is compliant with regulations related to disbursement of Title IV. (see [here](#)) **Closed.**
- 2016 program review found compliance issue was satisfactorily addressed and was closed in 2016. (see [here](#)) **Closed.**

- 2015 [action](#) for not properly completing disclosures for Gainful Employment Rule. (see [here](#)) **Closed.**
- 2015 [action](#) investigating representations made by Ashford University to potential and enrolled students, and has asked the Company and Ashford University to assist in its assessment of Ashford University's compliance with the prohibition on substantial misrepresentations. (see [here](#)) **Closed.**

You may ask, Where will the GI Bill students at Ashford go if VA does cut off GI Bill? Tanya Ang, formerly of ACE and now at VES has worked to identify good quality public and non-profit colleges that are willing to take the GI Bill students from Ashford, accept all or most of their credits, and help them achieve a good education.

Thank you for taking a look at this information.

Carrie Wofford

Veterans Education Success

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From: **Jamienne S. Studley** <jstudley@wscuc.org>  
Date: Thu, Feb 22, 2018 at 3:14 PM  
Subject: RE: Jamie, for your consideration  
To: Carrie Wofford <carrie.wofford@veteranseducationsuccess.org>  
Cc: Christopher Oberg <coberg@wscuc.org>

Thank you for sending the letter and additional information. We received the letter as a third party comment in December 2017. I am copying Christopher Oberg, WSCUC Vice President and Chief Operating Officer, for his use of these materials in the upcoming reaffirmation review of Ashford University.