

**BEFORE THE  
FEDERAL TRADE COMMISSION  
Washington, DC 20580**

In the Matter of )  
 )  
QuinStreet, Inc. and Reach Network, Inc. )  
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**Complaint, Request for Investigation, Injunction, and Other Relief Submitted by  
Veterans Education Success**

Pursuant to the Commission’s Rules, 16 C.F.R. § 2.2, Veterans Education Success respectfully requests that the Commission institute an investigation of businesses that operate unfair and deceptive lead generator websites in violation of Section 5(a) of the Federal Trade Commission Act, 15 U.S.C. § 45(a). The unfair and deceptive practices at issue are those of QuinStreet, Inc., Reach Network, Inc., and their partner schools. These businesses operate websites that engage in unfair and deceptive lead generation practices, promote predatory colleges, and target veterans and servicemembers.

**I. Complaining Party: Veterans Education Success**

Veterans Education Success, located at 1250 H St NW, Washington, DC 20005, email [help@vetsedsuccess.org](mailto:help@vetsedsuccess.org), and phone number (202) 838-5050, is a non-profit organization that works to advance higher education success for all military-affiliated students and provides free counseling and legal assistance to students using their GI Bill and military benefits.

**II. Deceptive Lead Generators**

**A. QuinStreet, Inc.**

QuinStreet is a publicly traded marketing firm<sup>1</sup> that uses advertising strategies to promote clients over the internet. It was founded by Doug Valenti.<sup>2</sup> QuinStreet maintains its headquarters in Foster City, CA.<sup>3</sup> Its career page also features employment positions in Bend, OR; Charlotte, NC; New York, NY; Sao Paulo, Brazil; and Pune, India.<sup>4</sup>

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<sup>1</sup> *QuinStreet, Inc., Common Stock (QNST) Quote & Summary Data*, NASDAQ, <https://www.nasdaq.com/symbol/qnst> (last visited Oct. 23, 2019).

<sup>2</sup> *Leadership*, QUINSTREET, <https://investor.quinstreet.com/leadership> (last visited Oct. 23, 2019).

<sup>3</sup> *QuinStreet, Company Details*, LINKEDIN, <https://www.linkedin.com/company/quinstreet/> (last visited Oct. 23, 2019).

<sup>4</sup> *Careers – Open Positions*, QUINSTREET, <https://quinstreet.com/careers> (last visited Jan. 21, 2020).

Over the years, QuinStreet has developed a reputation for deceptiveness. In 2012, 20 state attorneys general alleged that QuinStreet was misleading veterans through its website *GIBill.com*, which presented itself as the official government portal for the GI Bill, but steered veterans to only low-quality, high-priced for-profit colleges.<sup>5</sup> The attorneys general and QuinStreet entered into a settlement (an Assurance of Voluntary Compliance), which included a \$2.5M fine and QuinStreet's surrendering of the *GIBill.com* website domain to the U.S. Department of Veterans Affairs (VA).<sup>6</sup>

Despite this settlement, QuinStreet continues to target veterans for enrollment in low-quality colleges known for subpar student outcomes and aggressive and deceptive recruiting of veterans, such as Ashford University, Colorado Technical University, Grand Canyon University, and several other low-value, high-cost schools.<sup>7</sup> A great deal of this targeting takes place through education-related websites such as *schools.com*, which are owned by QuinStreet.

Throughout 2016 and 2017, QuinStreet partnered with Monster Worldwide, the operator of *Monster.com*, to gather leads, presumably of servicemembers and veterans, for low-quality, for-profit colleges on Monster's high-volume third-party website, *Military.com*.<sup>8</sup> As evidenced by the images below, these colleges included Ashford University and the Art Institutes, which have allegedly defrauded students and have extremely subpar student outcomes.<sup>9</sup>

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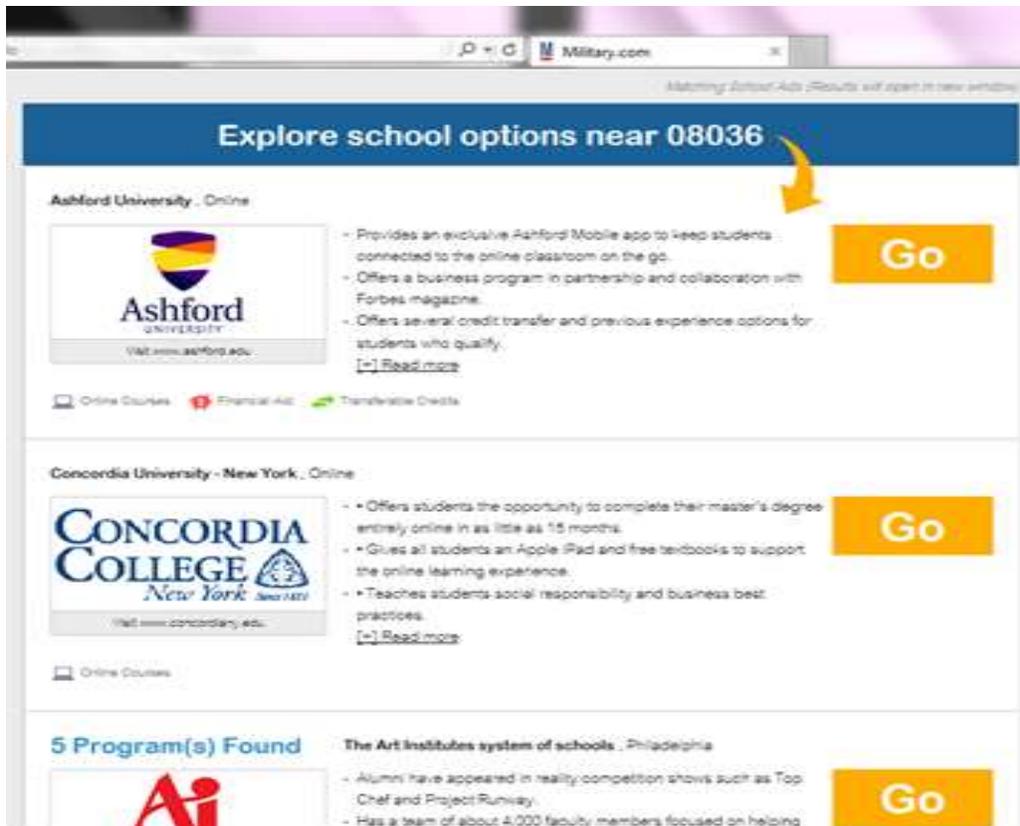
<sup>5</sup> Libby A. Nelson, *\$2.5M Settlement over GIBill.com*, INSIDE HIGHER ED (Jun. 28, 2012), <https://www.insidehighered.com/news/2012/06/28/attorneys-general-announce-settlement-profit-college-marketer>.

<sup>6</sup> Securities and Exchange Commission, "Assurance of Voluntary Compliance" (2012), available at <https://www.sec.gov/Archives/edgar/data/1117297/000119312512284713/d372925dex101.htm>.

<sup>7</sup> See US Senate Health, Education, Labor and Pensions Committee, *For Profit Higher Education: The Failure to Safeguard the Federal Investment and Ensure Student Success* (Jul. 30, 2012), available at [https://www.help.senate.gov/imo/media/for\\_profit\\_report/PartI.pdf](https://www.help.senate.gov/imo/media/for_profit_report/PartI.pdf); Veterans Education Success, "Law Enforcement Actions Against Predatory Colleges" (2019) available at <https://vetsedsuccess.org/law-enforcement-actions-against-predatory-colleges/>.

<sup>8</sup> David Halperin, *Military-Branded Websites Push Veterans to Troubled For-Profit Colleges*, HUFF. POST (Feb. 1, 2014), [https://www.huffingtonpost.com/davidhalperin/military-branded-websites\\_b\\_9131742.html](https://www.huffingtonpost.com/davidhalperin/military-branded-websites_b_9131742.html).

<sup>9</sup> See, e.g., Annie Nova, *His Two Year Degree Cost him \$90,000. Now He is in a Battle With the Education Department*, CNBC NEWS (Jul. 21, 2018), <https://www.cnbc.com/2018/06/22/thousands-of-students-who-say-they-were-defrauded-by-the-art-institute-awaiting-an-answer-from-the-government-.html>; Sarah Cascone, *Debt-Ridden Students Claim For-Profit Art Institutes Defrauded them with Predatory Lending Practices*, ARTNET NEWS (Jul. 23, 2018), <https://news.artnet.com/art-world/debt-ridden-students-art-institutes-1322102>; see also, Anna M. Phillips, *California Sues For-Profit Ashford University, Accusing the online School of Ripping off Students*, L.A. TIMES (Nov. 29, 2017), <http://www.latimes.com/local/education/la-me-edu-becerra-lawsuit-20171129-story.html>; Veterans Education Success, "Enrollment Trends and Student Outcomes at Ashford University" (2017) available at <https://vetsedsuccess.org/enrollment-trends-and-student-outcomes-at-ashford-university/>; Veterans Education Success, "Sampling of Student Complaints at Ashford University" (2017) available at <https://vetsedsuccess.org/ves-report-sampling-of-student-complaints-about-ashford-university/>; Veterans Education Success, "Summary of Veteran and Servicemember Student Complaints about Ashford University" (2020) available at <https://vetsedsuccess.org/summary-of-veteran-and-servicemember-student-complaints-about-ashford-university/>.



[Image above: colleges that appeared on Military.com, downloaded May 9, 2017]

QuinStreet has other legal troubles as well, indicating a likely motive to prioritize monetary gain over ethical business practices. In 2018, QuinStreet gained public scrutiny as its stock rose more than 250 percent then dropped precipitously amid allegations that it was involved in defrauding its clients.<sup>10</sup> Multiple shareholder lawsuits ensued as a result of QuinStreet’s alleged securities law violations.<sup>11</sup>

In addition to these claims, *Glassdoor.com* reviews provide an eye-opening perspective about what takes place at QuinStreet. One former customer service representative in Beaverton

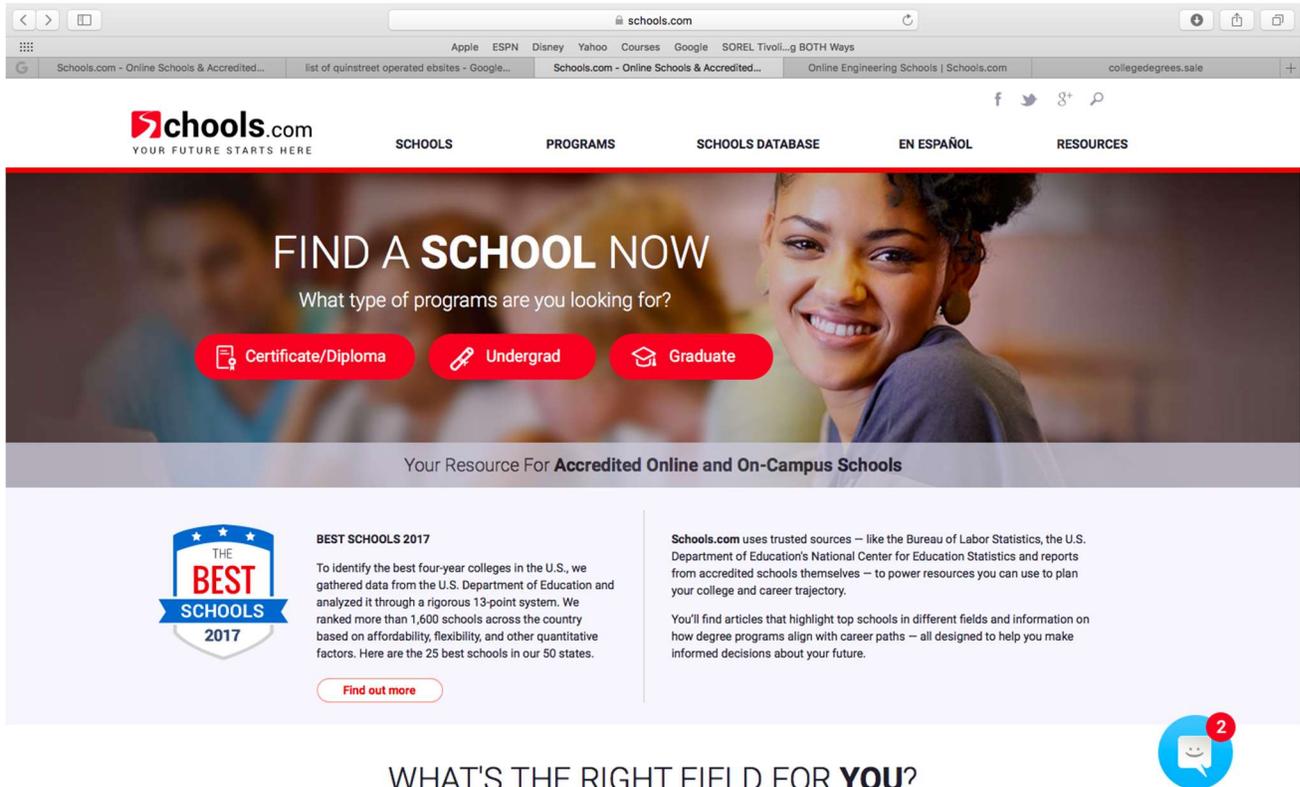
<sup>10</sup> *QuinStreet, Inc.: Leading Nowhere*, SEEKING ALPHA (Apr. 11, 2018), <https://seekingalpha.com/article/4162422-quinstreet-inc-leading-nowhere>; See also *QuinStreet: Move This Spam Company to Your Junk Folder*, SEEKING ALPHA (Jan. 19, 2018), <https://seekingalpha.com/article/4138748-quinstreet-move-spam-company-junk-folder>.

<sup>11</sup> Rosen Law Firm, *Equity Alert: Rosen Law Firm Files Securities Class Action Lawsuit Against QuinStreet, Inc.- QNST*, BUSINESS WIRE (Apr. 27, 2018), <https://www.businesswire.com/news/home/20180427005844/en/EQUITY-ALERT-Rosen-Law-Firm-Files-Securities>; see also Kirby McInerney LLP, *Investor Alert: Kirby McInerney LLP Announces the Filing of a Securities Class Action on Behalf of QuinStreet, Inc. (QNST) Investors*, BUSINESS WIRE (Apr. 30, 2018), <https://www.businesswire.com/news/home/20180430006587/en/INVESTOR-ALERT-Kirby-McInerney-LLP-Announces-Filing>; see also *QuinStreet, Inc: Lawsuit for Investors in Shares of QuinStreet, Inc., (NASDAQ: QNST) Announced by Shareholders Foundation*, MARKETSCREENER (May 21, 2018), <https://www.marketscreener.com/QUINSTREET-INC-5948969/news/QuinStreet-Inc-Lawsuit-for-Investors-in-Shares-of-QuinStreet-Inc-NASDAQ-QNST-Announced-by-Sha-26626752/>.

said, “You are tricking decent people who are looking for jobs into being telemarketed by profit driven schools. You will hate yourself and your voice after repeating the same lines for weeks. You are a liar on every call, you are not helping people, you are deceiving them.”<sup>12</sup>

### 1. QuinStreet still operates deceptive lead generator websites

QuinStreet operates multiple lead generation websites, including *getinfo.computertrainingschools.com*, *schools.com*, *onlineschools.com*, and *worldwidelearn.com*.



[Image above: schools.com homepage, downloaded October 8, 2018]

<sup>12</sup> Reviews of QuinStreet, GLASSDOOR, <https://www.glassdoor.com/Reviews/Employee-Review-QuinStreet-RVW19903809.htm> (last visited Oct. 23, 2019).



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[Image above: QuinStreet, Inc. copyright on schools.com, downloaded October 8, 2018]

**schools.com**  
YOUR FUTURE STARTS HERE

Your Campus & Online search results for Undergraduate Construction Engineering programs near 28027  
This list may contain out-of-state and online schools that accept students from 28027.

Refine School Matches Hide filters ▲

SUBJECT	DEGREE	PROGRAM TYPE	START TIME
<input type="checkbox"/> All <a href="#">Clear All</a>	<input type="checkbox"/> No Preference	<input checked="" type="radio"/> Both	<input checked="" type="radio"/> No Preference
<input type="checkbox"/> Aerospace Engineering	<input checked="" type="checkbox"/> Associate	<input type="radio"/> Campus	<input type="radio"/> Less than 1 month
<input type="checkbox"/> Architectural Engineering	<input checked="" type="checkbox"/> Bachelor	<input type="radio"/> Online	<input type="radio"/> 1-3 months
<input type="checkbox"/> Automotive Engineering	<input type="checkbox"/> Master		<input type="radio"/> More than 3 months
<input type="checkbox"/> Biomedical Engineering	<input type="checkbox"/> Doctoral		

[See More](#) [See More](#)

LOCATION  
28027

Thank you for sharing your preferences.  
You can find other options through our sponsored listings below!

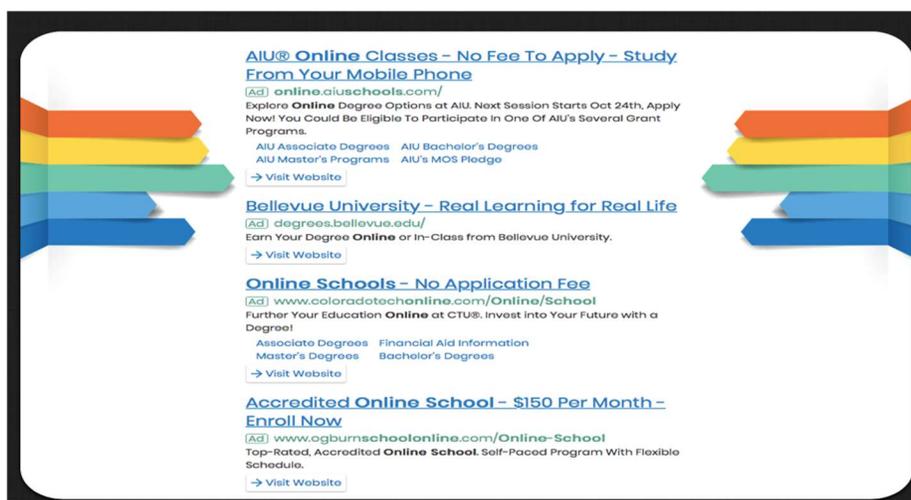
**Show My Options**  
Search Sponsored Listings

**Quick Fact**  
In 2017, workers with a bachelor's degree or higher had almost twice as much median earnings per week than workers with only a high school diploma\*.  
\*Bureau of Labor Statistics

[Image above: schools.com college search tool, downloaded October 8, 2018]

These websites are used to create leads for schools that are willing to pay. To illustrate how this works, after completing a series of personal questions, including questions about what type of degree one would like to pursue, *schools.com* links to *collegedegrees.sale*. This website advertises low-quality, for-profit colleges like Colorado Technical University and American InterContinental University (AIU) - both owned by Career Education Corporation (recently re-

branded as Perdoceo), which is characterized by extremely subpar student outcomes<sup>13</sup>; spends the least amount of tuition on instruction of almost any school in the country<sup>14</sup>; settled with the Commission in August 2019 for deceiving students, in part by using the services of deceptive lead generator websites<sup>15</sup>; and settled with 48 states plus the District of Columbia, for nearly \$500 million in January 2019 for defrauding students in nearly every state in the nation.<sup>16</sup>



[Image above: schools featured on collegesale.com, downloaded October 8, 2018]

In addition to leads generated through *schools.com*, QuinStreet generates leads through *getinfo.computertrainingschools.com*, as shown by the screenshots below.

<sup>13</sup> See US Senate Health, Education, Labor and Pensions Committee, For Profit Higher Education: The Failure to Safeguard the Federal Investment and Ensure Student Success (Jul. 30, 2012), available at [https://www.help.senate.gov/imo/media/for\\_profit\\_report/PartI-PartIII-SelectedAppendixes.pdf](https://www.help.senate.gov/imo/media/for_profit_report/PartI-PartIII-SelectedAppendixes.pdf); Colorado Technical University, COLLEGE SCORECARD, <https://collegescorecard.ed.gov/school/?126827-Colorado-Technical-University-Colorado-Springs> (last visited Feb. 18, 2020); American InterContinental University, COLLEGE SCORECARD, [https://collegescorecard.ed.gov/school/?445027-American\\_InterContinental\\_University](https://collegescorecard.ed.gov/school/?445027-American_InterContinental_University) (last visited Feb. 18, 2020).

<sup>14</sup> Veterans Education Success, “Should Colleges Spend the GI Bill on Veterans’ Education or Late Night TV Ads?” (2019), 11, available at [https://vetsedsuccess.org/wp-content/uploads/2019/04/VES\\_Instructional\\_Spending\\_Report\\_FINAL.pdf](https://vetsedsuccess.org/wp-content/uploads/2019/04/VES_Instructional_Spending_Report_FINAL.pdf).

<sup>15</sup> U.S. v. Career Education Corporation, et. al, Complaint, August 27, 2019, 5, available at [https://www.ftc.gov/system/files/documents/cases/career\\_education\\_corporation\\_complaint\\_8-27-19.pdf](https://www.ftc.gov/system/files/documents/cases/career_education_corporation_complaint_8-27-19.pdf).

<sup>16</sup> Paul Fain, *Career Education Corp. Settles With States, Forgives Student Debt*, Inside Higher Ed (Jan. 4, 2019), <https://www.insidehighered.com/quicktakes/2019/01/04/career-education-corp-settles-states-forgives-student-debt>.

Here are 15 Computer Engineering programs near 28027 you should also consider

Change Program Type

Bachelor

28027

UPDATE

(Results will open in a new window)  
Matching School Ads

	<p><b>3 Programs Found</b> <span>Online</span></p> <ul style="list-style-type: none"> <li>Ranked among the Best Online Bachelor's Programs by U.S. News and World Report in 2015.</li> <li>Ranked among the Best Online MBA Programs by U.S. News and World Report in 2015.</li> <li>Founded in 1890, it has a campus in Waterbury, CT and offers online degree program in eight-week modules, six times a year.</li> </ul> <p>[+] Read more</p> <p>Financial Aid   Good For Working Adults   Flexible Scheduling   Online Courses   Accelerated Programs   Transferable Credits</p>	<p><b>GO &gt;</b></p> <p><a href="http://www.post.edu">www.post.edu</a></p>
	<p><b>2 Programs Found</b> <span>Online</span></p> <ul style="list-style-type: none"> <li>Online and on-campus programs include Cloud Technologies (BS), Mobile Development (BS), and Web Design and Development (BS)</li> <li>Curriculum designed to prepare students for a career in tech by immersing students in a project-based learning environment</li> <li>Students can learn how to manage cloud technology or gain coding skills for apps, websites, and software</li> </ul> <p>[+] Read more</p> <p>Online Courses</p>	<p><b>GO &gt;</b></p> <p><a href="http://www.fullsail.edu">www.fullsail.edu</a></p>
	<p><b>2 Programs Found</b> <span>Online</span></p> <ul style="list-style-type: none"> <li>Offers MUSE (My Unique Student Experience), a content delivery system that gives students the option to watch, view, read or listen to required course materials.</li> <li>Allows students to complete courses at whatever pace they want.</li> <li>A DANTES-affiliated university and member of the Service Members Opportunity Colleges.</li> </ul> <p>[+] Read more</p> <p>Financial Aid   Good For Working Adults   Flexible Scheduling   Online Courses   Transferable Credits</p>	<p><b>GO &gt;</b></p> <p><a href="http://www.aiuonline.edu">www.aiuonline.edu</a></p>
	<p><b>ECPI UNIVERSITY</b> <span>Online</span></p> <ul style="list-style-type: none"> <li>ECPI's online programs keep you ahead of curve in today's fast-growing tech industry</li> <li>SACS accredited with programs in Cybersecurity, Cloud Computing, Engineering &amp; more</li> <li>US News &amp; World Report ranks Online Bachelor's Programs among top 10%</li> </ul> <p>[+] Read more</p> <p>Financial Aid   Good For Working Adults   Flexible Scheduling   Online Courses   Accelerated Programs   Transferable Credits</p>	<p><b>GO &gt;</b></p> <p><a href="http://ecpi.edu">ecpi.edu</a></p>
	<p><b>3 Programs Found</b> <span>Online</span></p> <ul style="list-style-type: none"> <li>Online BS, MS, PhD, or DIT IT degrees that can provide the specialized technology skills you need to move forward in your career.</li> <li>Focus on areas that fit your career &amp; personal goals, including information assurance &amp; cybersecurity, analytics, software development, system development, project management, &amp; digital forensics.</li> <li>Programs in two online learning formats, GuidedPath and FlexPath - a groundbreaking, self-paced learning option that lets you take classes at your own speed—the faster you move, the more you save.</li> </ul> <p>Financial Aid   Online Courses   Transferable Credits</p>	<p><b>GO &gt;</b></p> <p><a href="http://www.capella.edu">www.capella.edu</a></p>
	<p><b>1 Program Found</b> <span>Online</span></p> <ul style="list-style-type: none"> <li>Prepare to Enter the Rapidly Expanding Field of Technology With a Bachelor's Degree Online From Grand Canyon University</li> <li>Choose from a variety of undergraduate degree options such as Information Technology, Programming, Cybersecurity and more.</li> <li>A technology degree from GCU helps you prepare to work with organizations to improve efficiency and performance of their enterprise systems.</li> </ul> <p>[+] Read more</p> <p>Financial Aid   Good For Working Adults   Flexible Scheduling   Online Courses   Accelerated Programs   Transferable Credits</p>	<p><b>GO &gt;</b></p> <p><a href="http://GCU.edu">GCU.edu</a></p>
	<p><b>1 Program Found</b> <span>Online</span></p> <ul style="list-style-type: none"> <li>Earn your Associate's, Bachelor's, or Master's degree in Information Technology</li> <li>Non-profit and institutionally accredited by WASC</li> <li>Students can earn their degree online with comprehensive support and 24/7 access</li> </ul> <p>[+] Read more</p> <p>Online Courses</p>	<p><b>GO &gt;</b></p> <p><a href="http://www.argosy.edu">www.argosy.edu</a></p>

[Image above: schools featured on [getinfo.computertrainingschools.com](http://getinfo.computertrainingschools.com), downloaded October 8, 2018]

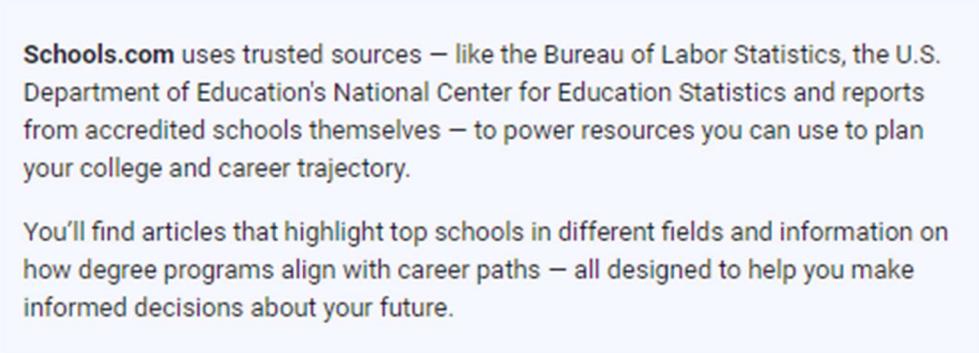
After filling out some personal information, a list of schools (e.g., the list above) is generated. Most of the schools that are promoted are for-profit colleges with extremely subpar student outcomes and law enforcement concern about fraud.<sup>17</sup>

**a. *Schools.com***

*Schools.com* is misleading because it features lists and rankings of “over 7,000 schools,” which it claims are based on government data. However, running a search using its “search schools” tool yields colleges that apparently paid to be listed in the search results. Additionally, colleges that appear in the search results are located geographically distant from the zip code submitted.

A site visitor can search the *Schools.com* “schools database,” which features private non-profit schools, public schools, and private for-profit schools. School listings for each state are presented as well. *Schools.com* also offers rankings of four-year colleges, community colleges, as well as articles that offer advice for prospective students.

*Schools.com* claims that it relies on “trusted sources” like the Bureau of Labor Statistics and the U.S. Department of Education to “help [site visitors] make informed decisions about [their] future.”



**Schools.com** uses trusted sources – like the Bureau of Labor Statistics, the U.S. Department of Education's National Center for Education Statistics and reports from accredited schools themselves – to power resources you can use to plan your college and career trajectory.

You'll find articles that highlight top schools in different fields and information on how degree programs align with career paths – all designed to help you make informed decisions about your future.

[Image above: *schools.com*'s claim that it uses trusted sources, downloaded January 2, 2020]

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<sup>17</sup> See US Senate Health, Education, Labor and Pensions Committee, For Profit Higher Education: The Failure to Safeguard the Federal Investment and Ensure Student Success (Jul. 30, 2012), available at [https://www.help.senate.gov/imo/media/for\\_profit\\_report/PartI.pdf](https://www.help.senate.gov/imo/media/for_profit_report/PartI.pdf); Veterans Education Success, “Law Enforcement Actions Against Predatory Colleges” (2019) available at <https://vetsedsuccess.org/law-enforcement-actions-against-predatory-colleges/>.



Like 0 Tweet

Finding the right school for you can be a challenging and confusing process. To help make this experience better, we have created this tool to help easily navigate over 7,000 schools. Included in this list are both two- and four-year schools, with online and on-campus schools represented. You can quickly filter your results by the type of school you're interested in, the in-state tuition price, and the number of online degree programs that are offered. Please note that the results are automatically sorted alphabetically.

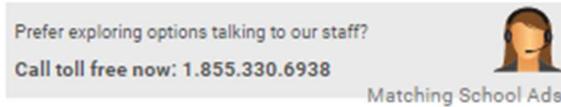
Source: Integrated Postsecondary Education Data System (IPEDS) 2017-18. National Center for Education Statistics. <http://nces.ed.gov/ipeds>

[Image above: description of schools.com search database, downloaded January 3, 2020]

However, a fixed menu appears after scrolling down on any page on *Schools.com*. It features a menu item labeled “search schools,” which is distinguished from the other menu items with a red background that is likely intended to draw site visitors’ attention. Clicking on “search schools” allows site visitors to search for schools by degree type, area of study, and location. Running a search creates a list of schools with the label “Matching School Ads.”



[Image above: fixed menu featuring “search schools” menu item, downloaded January 3, 2020]



[image above: “Matching School Ads” label on *QuinStreet* school searches, downloaded February 18, 2020]

A disclaimer page appearing on *QuinStreet* websites demonstrates that schools paid to appear in the search results. The following disclosure appears in small text on the bottom of *QuinStreet* webpages: “[w]e strive to provide important information on this website that is accurate, complete and timely, but we make no guarantee about the information, the selection of schools, school accreditation status, the availability of or eligibility for financial aid, employment

opportunities or education or salary outcomes. Visit [here](#) for important information on these topics.”



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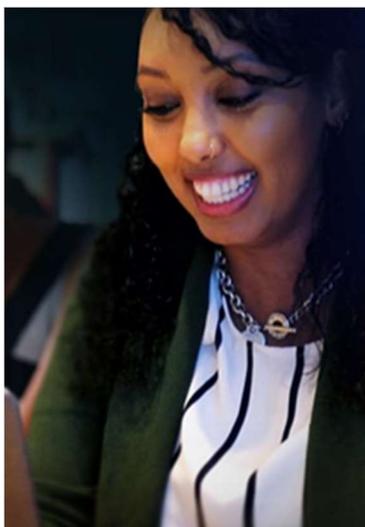


**Important Information:** We strive to provide information on this website that is accurate, complete and timely, but we make no guarantees about the information, the selection of schools, school accreditation status, the availability of or eligibility for financial aid, employment opportunities or education or salary outcomes. Visit [here](#) for important information on these topics.

[image above: “Important Information” disclaimer featured at the bottom of *QuinStreet* webpages, downloaded February 18, 2020]

Clicking on “[here](#)” brings site visitors to a disclaimer page that states “[o]ur websites feature schools that are our clients and from whom we may receive compensation (‘Sponsored Schools’). Our websites do not, and are not intended to, provide a comprehensive list of all schools in the United States or of all schools located in a specific geographic area or of all schools that offer a particular program of study. Where Sponsored School listings appear on our websites, Sponsored School listings will include a ‘sponsored results,’ ‘matching ads’ or similar label.” The “Matching School Ads” label appears on school lists produced by *QuinStreet*’s search tool. This indicates that schools paid to appear in search results.

*QuinStreet*’s website demonstrates further that these schools paid to appear in search results. On *QuinStreet.com*, *QuinStreet* describes the lead generation services it offers to colleges.



#### QUINSTREET EDUCATION

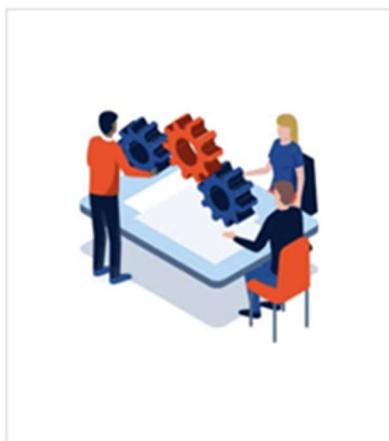
## Leaders In The New Era Of Digital Marketing In Education

*QuinStreet* is changing the narrative in higher education by delivering full transparency, right-pricing media, and providing maximum campaign control and flexibility. After 20 years of continuous investment in quality, the data speaks for itself.

- Serve 450+ colleges, universities and higher education institutions
- Generate 30k+ new student applications annually
- Committed to high compliance standards (Culture of Compliance award recipient 2018)

[image above: *QuinStreet Education* webpage, downloaded February 18, 2020]

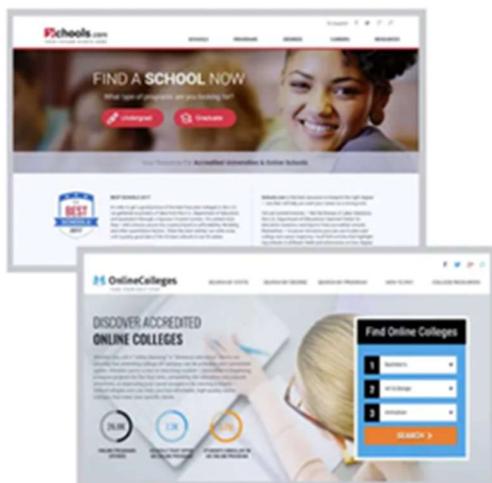
Clicking on a link labeled “Our Products” brings site visitors to a page describing QuinStreet’s lead generation services.



## Our Products

[image above: QuinStreet “Our Products” link, downloaded February 18, 2020]

The “products” page advertises “right-priced clicks,” “right-priced inquiries,” “warm call transfers,” and “branded emails.” QuinStreet features images of *Schools.com* and its college search tool next to the description of “right-priced inquiries.” This indicates that *Schools.com* is used by QuinStreet to collect and deliver consumer information to its client schools.



## Right-Priced Inquiries

Right-priced inquiries are driven by proprietary QuinStreet technology that engages, sorts, and delivers only those inquiries most likely to apply.

### Key Benefits:

- Best Sources: High-intent organic and paid search sources are identified and right-priced in order to meet the client’s target acquisition costs
- Attribute Focus: Multiple-tiered campaigns give the flexibility to pulse key attributes such as degree of interest, area of interest, program of interest
- Highly Efficient: These higher-intent inquiries help increase your school’s call center’s productivity, leading to massive cost-savings

[image above: QuinStreet’s product’s page, downloaded February 18, 2020]

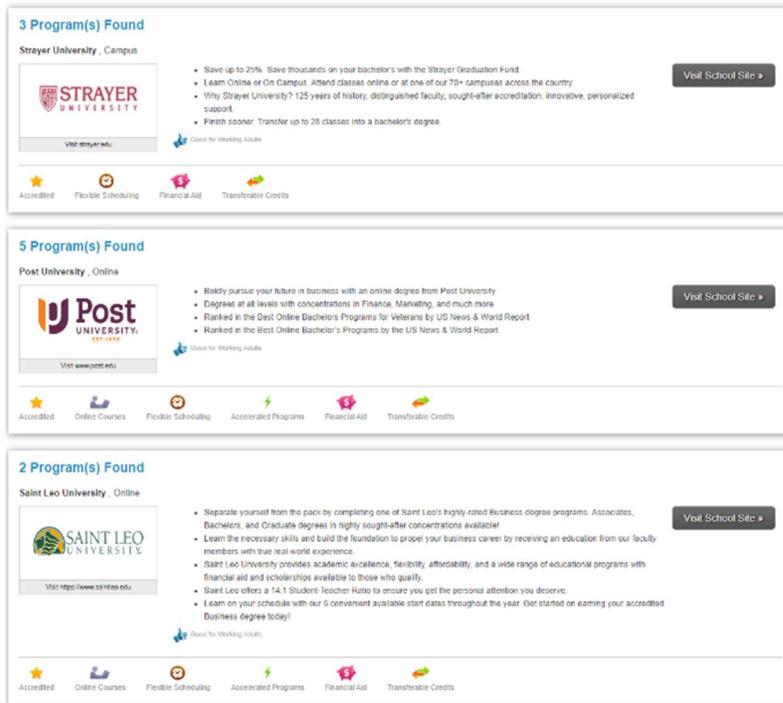
Combined with QuinStreet’s disclosures, QuinStreet’s “products” page demonstrates that schools pay to appear in search results and they are not based on the “trusted sources” on which *Schools.com* claims to rely.

In addition to the evidence above, the same for-profit colleges appear in search results when submitting different zip codes on the *Schools.com* search tool, which makes it even more clear that schools are paying to be listed. For example, submitting the zip code for Ashburn, VA (20147) for an undergraduate degree in accounting produces the following results:

The screenshot shows the Schools.com search results for accounting programs in zip code 20147. The search filters are set to: SUBJECT: Accounting Technology, Bookkeeping, CPA Certified Public Accountant, Forensic Accounting; DEGREE: Associate, Bachelor, Master, Doctoral; PROGRAM TYPE: Both, Campus, Online; START TIME: No Preference, Less than 1 month, 1-3 months, More than 3 months; LOCATION: 20147.

The results show four programs found:

- 1 Program(s) Found:** ECPI University, Online. Features: Accredited, Online Courses, Flexible Scheduling, Accelerated Programs, Financial Aid, Transferable Credits.
- 2 Program(s) Found:** Grand Canyon University, Online. Features: Accredited, Online Courses, Flexible Scheduling, Accelerated Programs, Financial Aid, Transferable Credits.
- 4 Program(s) Found:** Forbes School of Business & Technology at Ashford University, Online. Features: Accredited, Online Courses, Financial Aid, Transferable Credits.
- 3 Program(s) Found:** Capella University, Online. Features: Accredited, Online Courses, Financial Aid, Transferable Credits.



[Image above: search results on schools.com, downloaded September 23, 2019]

The schools listed include ECPI University, Grand Canyon University, Forbes School of Business & Technology at Ashford University, Capella University, Strayer University, Post University, and Saint Leo University - most of which are characterized by subpar student outcomes and law enforcement concerns.<sup>18</sup> Submitting the zip code for Jacksonville, NC (28547) produces almost identical results. The schools listed include ECPI University, Grand Canyon University, Forbes School of Business & Technology at Ashford University, Capella University, Post University, Independence University, and Saint Leo University.

<sup>18</sup> Veterans Education Success, "Law Enforcement Actions Against Predatory Colleges" (2019) available at <https://vetsedsuccess.org/law-enforcement-actions-against-predatory-colleges/>; *College Scorecard*, COLLEGE SCORECARD, <https://collegescorecard.ed.gov/> (last visited Feb. 18, 2020); Veterans Education Success, "Enrollment Trends and Student Outcomes at Ashford University" (2017) available at <https://vetsedsuccess.org/enrollment-trends-and-student-outcomes-at-ashford-university/>; Veterans Education Success, "Sampling of Student Complaints at Ashford University" (2017) available at <https://vetsedsuccess.org/ves-report-sampling-of-student-complaints-about-ashford-university/>; Veterans Education Success, "Summary of Veteran and Servicemember Student Complaints about Ashford University" (2020) available at <https://vetsedsuccess.org/summary-of-veteran-and-servicemember-student-complaints-about-ashford-university/>.

Home > Schoolfinder

## Find a School that's Right for You!

**Refine School Matches** Hide Filters

<p><b>SUBJECT</b> <a href="#">Clear All</a></p> <input checked="" type="checkbox"/> All <input type="checkbox"/> Accounting Technology <input type="checkbox"/> Bookkeeping <input type="checkbox"/> CPA Certified Public Accountant <input type="checkbox"/> Forensic Accounting <a href="#">See More</a>	<p><b>DEGREE</b></p> <input type="checkbox"/> No Preference <input checked="" type="checkbox"/> Associate <input checked="" type="checkbox"/> Bachelor <input type="checkbox"/> Master <input type="checkbox"/> Doctoral <a href="#">See More</a>	<p><b>PROGRAM TYPE</b></p> <input checked="" type="radio"/> Both <input type="radio"/> Campus <input type="radio"/> Online	<p><b>START TIME</b></p> <input checked="" type="radio"/> No Preference <input type="radio"/> Less than 1 month <input type="radio"/> 1-3 months <input type="radio"/> More than 3 months
			<p><b>LOCATION</b></p> <input type="text" value="28547"/> <input type="button" value="Enter"/>

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**1 Program(s) Found**

**ECPI University**, Online

[Visit ecpi.edu](#)

Good for Working Adults

Accredited Online Courses Flexible Scheduling Accelerated Programs Financial Aid Transferable Credits

**2 Program(s) Found**

**Grand Canyon University**, Online

**GRAND CANYON UNIVERSITY**

COLLEGE OF BUSINESS

[Visit gcu.edu](#)

- Earn Your Bachelor's Degree in Business - Grand Canyon University Offers a Variety of Online Programs in Areas Such as Entrepreneurship, Finance, Management and More
- From Business Administration to Sports Management, there is no shortage of undergraduate business degrees available online.
- Grand Canyon University's undergraduate business majors develop and refine skills in core areas such as economics, accounting, marketing, statistics, organizational behavior and ethical issues.
- GCU's undergraduate business degrees cover topics all business professionals should understand in order to gain a solid academic foundation for a chosen career path.
- The real-world undergraduate business degrees offered by GCU prepare you to immediately apply the skills you are learning directly to your career.

Good for Working Adults

[Visit School Site >](#)

Accredited Online Courses Flexible Scheduling Accelerated Programs Financial Aid Transferable Credits

**4 Program(s) Found**

**Forbes School of Business & Technology at Ashford University**, Online

**Forbes School of Business & Technology**

at ASHFORD UNIVERSITY

[Visit ashford.edu](#)

- Discover 31 bachelor's and master's degrees in all areas of business, including business administration, finance, marketing, and more.
- 24 business degree programs are accredited by the International Accreditation Council for Business Education (IACBE).
- Business students may be eligible for scholarships such as the Entrepreneurship Scholarship.
- Degree programs are offered entirely online in a flexible format that fits into the busy lives of working adults.

[Visit School Site >](#)

Accredited Online Courses Financial Aid Transferable Credits

**3 Program(s) Found**

**Capella University**, Online

**CAPPELLA UNIVERSITY**

[Visit www.capella.edu](#)

- Professionally relevant online business programs at every level — bachelor's, master's, MBA, PhD, and DBA.
- Specializations in accounting, business intelligence, finance, health care management, HR management, leadership, marketing, project management, and more.
- Discover FlexPath, a groundbreaking, self-paced learning option that lets you take classes at your own speed—the faster you move, the more you save.
- Accreditation is important. select business offerings are accredited by ACBSP and FIM-GAC. (FlexPath options not accredited by FIM-GAC)

[Visit School Site >](#)

Accredited Online Courses Financial Aid Transferable Credits

### 5 Program(s) Found

Post University - Online



- Boldly pursue your future in business with an online degree from Post University
- Degrees at all levels with concentrations in Finance, Marketing, and much more
- Ranked in the Best Online Bachelors Programs for Veterans by US News & World Report
- Ranked in the Best Online Bachelor's Programs by the US News & World Report

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Good for Working Adults

Accredited Online Courses Flexible Scheduling Accelerated Programs Financial Aid Transferable Credits

### 2 Program(s) Found

Independence University - Online



**The Secret to Getting Ahead is Getting Started**

With a mission of helping students graduate, launch better careers, and gain greater independence to live the life they want as soon as possible, Independence University® offers flexible fully online degree programs. Program options are available in healthcare, business, information technology, and graphic arts. The programs are career-focused to help ensure the knowledge and skills you learn match what today's employers are looking for.

[Request Info >](#)

Good for Working Adults

Accredited Online Courses Flexible Scheduling Financial Aid Transferable Credits

### 2 Program(s) Found

Saint Leo University - Online



- Separate yourself from the pack by completing one of Saint Leo's highly rated Business degree programs. Associates, Bachelors, and Graduate degrees in highly sought-after concentrations available!
- Learn the necessary skills and build the foundation to propel your business career by receiving an education from our faculty members with true real world experience.
- Saint Leo University provides academic excellence, flexibility, affordability, and a wide range of educational programs with financial aid and scholarship available to those who qualify.
- Saint Leo offers a 14:1 Student:Teacher Ratio to ensure you get the personal attention you deserve.
- Learn on your schedule with our 6 convenient available start dates throughout the year. (Get started on earning your accredited Business degree today!)

[Visit School Site >](#)

Good for Working Adults

Accredited Online Courses Flexible Scheduling Accelerated Programs Financial Aid Transferable Credits

Matching School Ads

[Image above: search results on schools.com, downloaded September 23, 2019]



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[PROGRAMS](#)
[SCHOOLS DATABASE](#)
[EN ESPAÑOL](#)
[RESOURCES](#)

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Home > Schoolfinder

## Find a School that's Right for You!

Refine School Matches Hide Filters

<p><b>SUBJECT</b> <small>Clear All</small></p> <p><input checked="" type="checkbox"/> All</p> <p><input type="checkbox"/> Accounting Technology</p> <p><input type="checkbox"/> Bookkeeping</p> <p><input type="checkbox"/> CPA Certified Public Accountant</p> <p><input type="checkbox"/> Forensic Accounting</p> <p><a href="#">See More</a></p>	<p><b>DEGREE</b></p> <p><input type="checkbox"/> No Preference</p> <p><input type="checkbox"/> Associate</p> <p><input type="checkbox"/> Bachelor</p> <p><input checked="" type="checkbox"/> Master</p> <p><input type="checkbox"/> Doctoral</p> <p><a href="#">See More</a></p>	<p><b>PROGRAM TYPE</b></p> <p><input checked="" type="checkbox"/> Both</p> <p><input type="checkbox"/> Campus</p> <p><input type="checkbox"/> Online</p>	<p><b>START TIME</b></p> <p><input checked="" type="checkbox"/> No Preference</p> <p><input type="checkbox"/> Less than 2 month</p> <p><input type="checkbox"/> 1-3 months</p> <p><input type="checkbox"/> More than 3 months</p>
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**LOCATION**  
28547 [Filter](#)

**Showing schools in your area**

Find a matching option talking to our staff? Call toll free now: 1.855.336.6638 [Request School Ads](#)

### 5 Program(s) Found

Purdue University Global - Online



- Flexible, 100% online and campus based programs available

Good for Working Adults

Accredited Online Courses Flexible Scheduling Financial Aid Transferable Credits

### 3 Program(s) Found

Grand Canyon University - Online



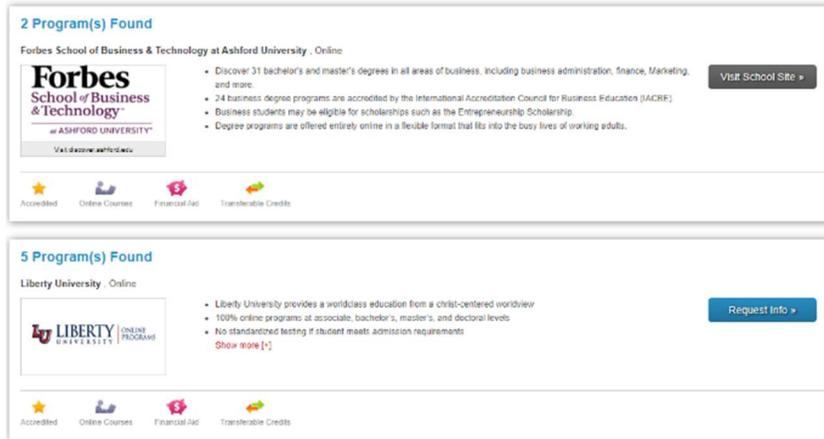
- Which career path will you take - Business, Nursing, Education, Psychology? Something else? GCU offers more than 100 majors to get you started!
- College of Business: Features more than 25 programs from the bachelor through the master's level, including several high-demand MBA programs and an accelerated accounting degree.
- College of Nursing and Health Care Professions: Rich 25-year history providing outstanding health care and nursing degree programs, including an RN to BSN program & master's in nursing degrees
- College of Education: Whether you are looking to start or advance your career as a teacher or administrator, GCU offers bachelor's and master's in education degrees in key areas.
- College of Humanities and Social Sciences: Provides a job focused education and features a variety of programs from counseling and psychology to justice studies, history and English literature.
- Does something else interest you? GCU also offers programs in Doctoral Studies, Theology, Science, Engineering & Technology, and Fine Arts & Production. Speak with an enrollment counselor today!

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Good for Working Adults

Accredited Online Courses Flexible Scheduling Accelerated Programs Financial Aid Transferable Credits

15



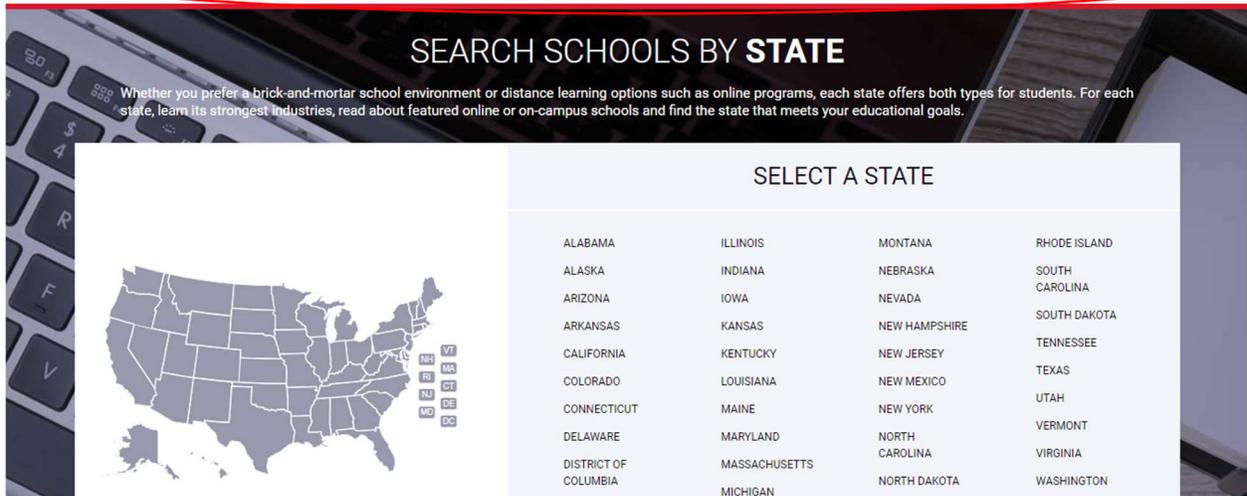
[Image above: search results on schools.com, downloaded September 23, 2019]

Colleges that are much closer to the submitted zip codes are excluded despite the fact that they also offer the same or similar degree programs at lower tuition and with better student outcomes. For example, George Mason University (GMU), the George Washington University (GWU), and Northern Virginia Community College (NOVA) are excluded from the Ashburn, VA, search results. GWU has a physical campus in Ashburn, VA; NOVA has a physical campus in Sterling, VA; and GMU has a physical campus in Fairfax, VA. By comparison, Grand Canyon University’s physical campus is in Phoenix, AZ, and Ashford University’s physical campus is in San Diego, CA.

As for the Jacksonville, NC, search results, Jacksonville is in close proximity to two military base education centers at Camp Lejeune, NC, and New River, NC. Both have resident schools, including Coastal Carolina Community College, Campbell University, Embry-Riddle Aeronautical University, University of North Carolina Wilmington, Boston University, Webster University, and Southern Illinois University.<sup>19</sup> None of these schools appear in the Jacksonville, NC, search results on *schools.com*.

As mentioned previously, *schools.com* features school lists for each state, and the fixed menu with the “search schools” menu item appears after scrolling down on any page. This means that a consumer visiting the *schools.com* page featuring school listings by state would have the “search schools” menu item visible. This makes it more likely that a consumer would assume that submitting his zip code in the *schools.com* search would yield schools close to his geographic area, and not on the other side of the country. A consumer might also assume that these search results are based off the “trusted sources” touted by *schools.com*, as opposed to a financial relationship between *schools.com* and colleges that presumably paid to be featured in the search results.

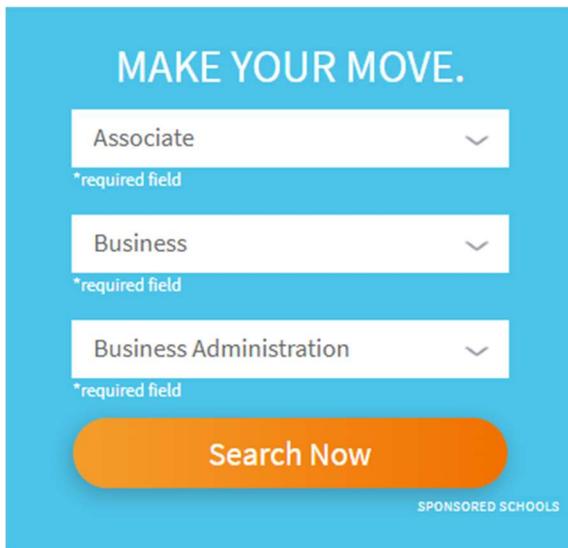
<sup>19</sup> *Resident Colleges and Universities*, MC CS LEJEUNE-NEW RIVER, <http://www.mccslejeune-newriver.com/edu/files/032919-resident-schools.pdf> (last visited Oct. 23, 2019).



[Image above: fixed menu featuring “search schools” menu item, downloaded January 3, 2020]

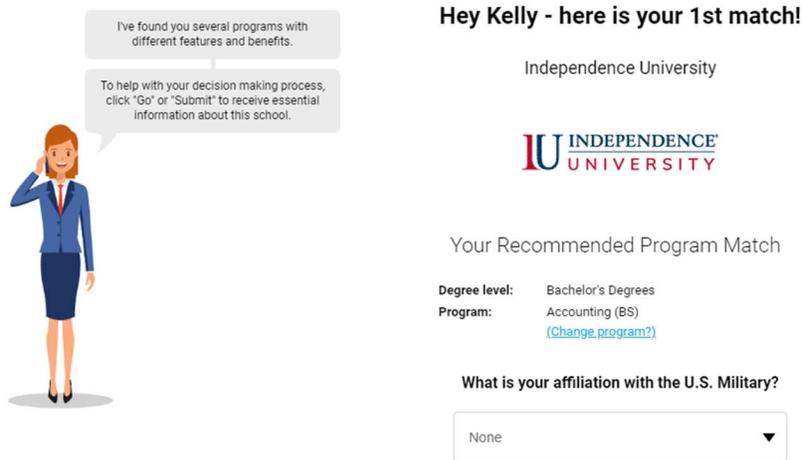
**b. Onlinedegrees.com**

QuinStreet also operates *onlinedegrees.com*. Like *schools.com*, *onlinedegrees.com* features school rankings and schools by state, and articles offering advice to prospective students. It also allows site visitors to search for colleges. These searches yield poor-performing colleges that presumably paid to appear in the results. The college search tool depicted below appears throughout *onlinedegrees.com* webpages.



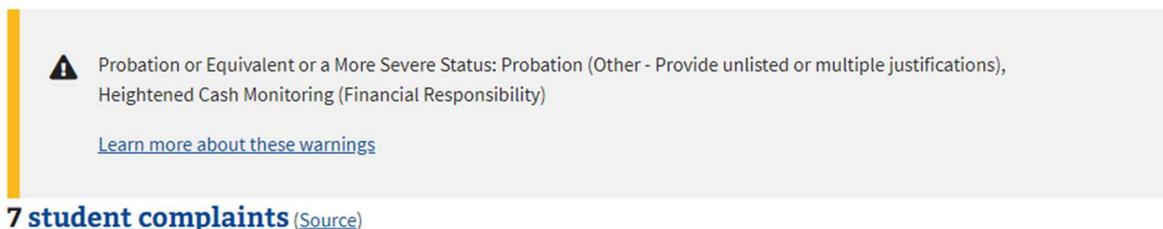
[Image above: *onlinedegrees.com* search tool, downloaded January 7, 2020]

Searching for a Bachelor’s degree in accounting yielded Independence University, an online college in Salt Lake City, Utah, owned by the Centers for Excellence in Higher Education, which has been accused of running fraudulent schools.<sup>20</sup>



[Image above: onlinedegrees.com search results, downloaded January 7, 2020]

On the VA’s GI Bill Comparison Tool, Independence University has a cautionary warning for “probation” and “heightened cash monitoring,” as well as seven student complaints.<sup>21</sup>



[Image above: GI Bill Comparison Tool cautionary warning, downloaded January 7, 2020]

At the bottom of its ranking pages, *onlinedegrees.com* lists many of the same schools that appear in *schools.com* search results, characterized by extremely subpar student outcomes and law enforcement concerns about fraud.

<sup>20</sup> David Halperin, *Troubles Compound for Predatory CollegeAmerica Chain*, HUFF. POST (Oct. 2, 2017), [https://www.huffpost.com/entry/troubles-compound-for-predatory-collegeamerica-chain\\_b\\_59ce85c7e4b0f3c468060e4a](https://www.huffpost.com/entry/troubles-compound-for-predatory-collegeamerica-chain_b_59ce85c7e4b0f3c468060e4a).

<sup>21</sup> *Independence University*, GI BILL COMPARISON TOOL, <https://www.va.gov/gi-bill-comparison-tool/profile/31940644#viewWarnings> (last visited Jan. 7, 2020).

**Associate in Business Administration**

Refine School Matches Hide filters

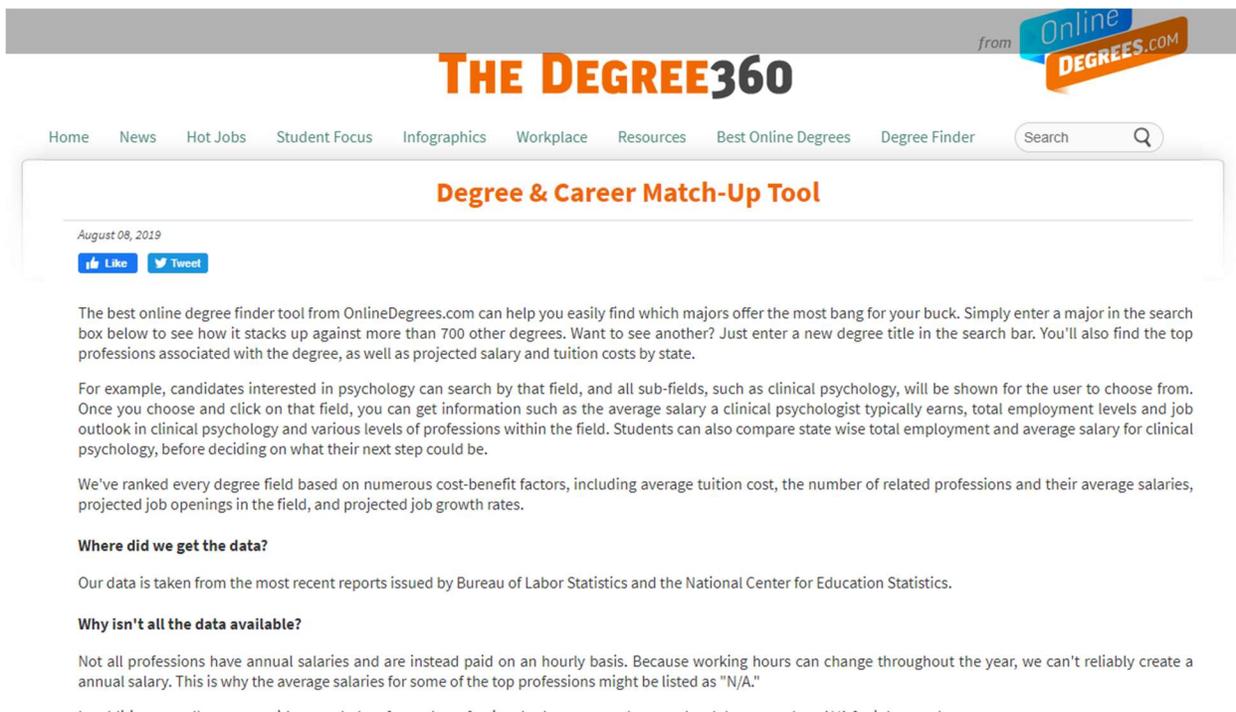
<p><b>SUBJECT</b> <a href="#">Clear All</a></p> <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> All</li> <li><input checked="" type="checkbox"/> Business Admin: Criminal Justice</li> <li><input checked="" type="checkbox"/> Business Admin: Finance</li> <li><input checked="" type="checkbox"/> Business Admin: Global Mgmt</li> <li><input checked="" type="checkbox"/> Business Admin: Healthcare Mgmt</li> </ul> <p><a href="#">See More</a></p>	<p><b>DEGREE</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> No Preference</li> <li><input checked="" type="checkbox"/> Associate</li> <li><input type="checkbox"/> Bachelor</li> <li><input type="checkbox"/> Master</li> <li><input type="checkbox"/> Doctoral</li> </ul> <p><a href="#">See More</a></p>	<p><b>PROGRAM TYPE</b></p> <ul style="list-style-type: none"> <li><input checked="" type="radio"/> Both</li> <li><input type="radio"/> Campus</li> <li><input type="radio"/> Online</li> </ul>	<p><b>START TIME</b></p> <ul style="list-style-type: none"> <li><input checked="" type="radio"/> No Preference</li> <li><input type="radio"/> Less than 1 month</li> <li><input type="radio"/> 1-3 months</li> <li><input type="radio"/> More than 3 months</li> </ul> <p><b>LOCATION</b></p> <p>Zip code <input type="text"/> <input type="button" value="Enter"/></p>
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Showing 17 matching schools in Virginia Prefer exploring options talking to our staff?  
Call toll free now: 1-855-330-6938

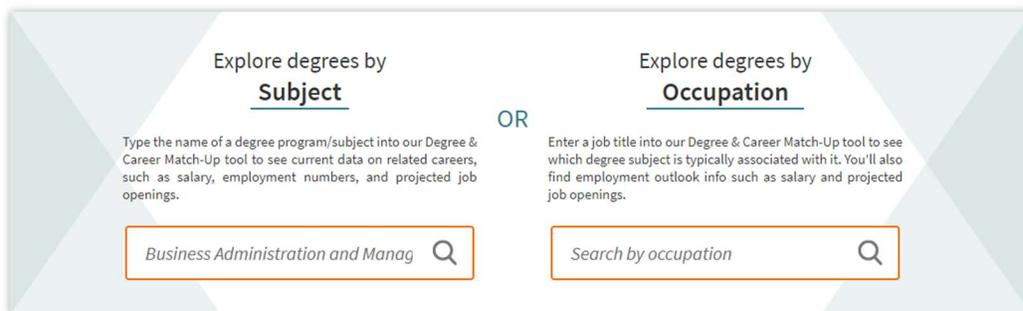
 <p><b>Saint Leo University</b></p> <p>Separate yourself from the pack by completing one of Saint Leo's highly-rated Business degree programs. Associates, Bachelors, and Graduate degrees in highly sought-after concentrations available! Learn the necessary skills and build the foundation to propel your business career by receiving an education from our faculty members with true real-world experience.</p> <p style="text-align: center;"><input type="button" value="Visit Site"/></p>	 <p><b>Florida Tech</b></p> <p>See What's Possible When You Earn a Degree at Florida Tech 100% Online Whatever your motivation for considering an undergraduate or graduate degree, Florida Tech offers programs online that can meet your needs. Here are a few reasons Florida Tech may be the right choice for you.</p> <p style="text-align: center;"><input type="button" value="Request Info"/></p>	 <p><b>Purdue University Global</b></p> <p>WELCOME TO PURDUE UNIVERSITY GLOBAL World-Class Education Tailored for Working Adults Building on Purdue's mission to provide greater access to affordable, world-class education, Purdue University Global delivers a fully personalized online experience tailored for working adults.</p> <p style="text-align: center;"><input type="button" value="Request Info"/></p>
 <p><b>Liberty University</b></p> <p>100% Online &amp; No Standardized Testing We are committed to helping you achieve your goals and complete your degree as quickly as possible.</p> <p style="text-align: center;"><input type="button" value="Request Info"/> <input type="button" value="Visit Site"/></p>	 <p><b>New England College</b></p> <p>You Served Your Country. Now Let New England College Serve You! Learn How NEC's Programs Fit a Military Lifestyle – 100% Online. New England College can help you discover an educational path that aligns with your military training and career aspirations. New England College is a regionally accredited, private, nonprofit institution that</p> <p style="text-align: center;"><input type="button" value="Request Info"/></p>	 <p><b>Averett University</b></p> <p>Averett University is a top-ranked, fully-accredited institution that offers students over 30 undergraduate majors, minors and special programs, and 5 master's programs. Accelerated programs designed for convenience: choose from weekly evening courses at one of Averett's Virginia locations or study online and on your own</p> <p style="text-align: center;"><input type="button" value="Visit Site"/></p>
 <p><b>Lancaster Bible College</b></p> <p>Lancaster Bible College/Capital Seminary &amp; Graduate School is a private Bible college composed of undergraduate, accelerated undergraduate and graduate learners. Lancaster Bible College/Capital Seminary &amp; Graduate School's mission has remained constant since 1933. Lancaster Bible College/Capital Seminary &amp; Graduate School offers 50+ majors, 8</p> <p style="text-align: center;"><input type="button" value="Visit Site"/></p>	 <p><b>Grand Canyon University</b></p> <p>Online Business Bachelor's Degrees From the Colangelo College of Business Programs in areas such as Entrepreneurship, Finance, Management and more Develop skills in areas such as statistics, organizational behavior and ethical issues Gain a solid academic foundation for a chosen career path</p> <p style="text-align: center;"><input type="button" value="Visit Site"/></p>	 <p><b>Regent University</b></p> <p>Topped the list as Best Online Bachelor's Program in Virginia by U.S. News &amp; World Report in 2019. Regent is ranked among Top National Universities by U.S. News &amp; World Report, 2019. Flexible online, on-campus and evening courses offered in 135 areas of study, including Business, Nursing, Psychology, &amp;</p> <p style="text-align: center;"><input type="button" value="Visit Site"/></p>
 <p><b>Forbes School of Business &amp; Technology at Ashford University</b></p> <p>Discover 31 bachelor's and master's degrees in all areas of business, including business administration, finance, Marketing, and more. 24 business degree programs are accredited by the International Accreditation Council for Business Education (IACBE). Business students may be eligible for</p> <p style="text-align: center;"><input type="button" value="Visit Site"/></p>	 <p><b>American InterContinental University Online</b></p> <p>You're serious about success. With your busy schedule and the desire to move your career forward, you can earn an accredited associate, bachelor's or master's degree at a pace that works for you anywhere, anytime, 24/7. At AIU, the Serious U, you can get started to get ahead. For important information about the</p> <p style="text-align: center;"><input type="button" value="Request Info"/></p>	 <p><b>Post University</b></p> <p>Boldly pursue your future in business with an online degree from Post University Degrees at all levels with concentrations in Finance, Marketing, and much more Ranked in the Best Online Bachelors Programs for Veterans by US News &amp; World Report Ranked in the Best Online Bachelor's Programs by the US News &amp; World Report</p> <p style="text-align: center;"><input type="button" value="Visit Site"/></p>

[Image above: search results appearing at the bottom of onlinedegrees.com rankings pages, downloaded January 7, 2020]

Onlinedegrees.com also features a “Degree & Career Match-Up Tool” that it claims “can help you easily find which majors offer the most bang for your buck.” It also claims that it relies on Bureau of Labor Statistics (“BLS”) and National Center for Education Statistics (“NCES”) data.



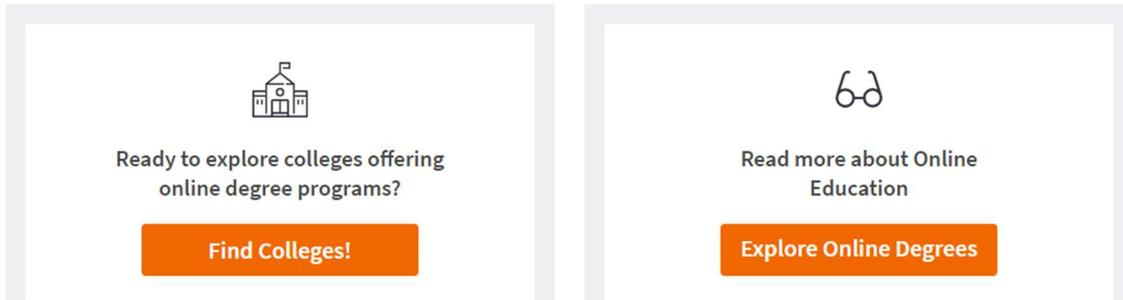
[Image above: “Degree & Career Match-Up Tool” description, downloaded January 7, 2020]



[Image above: Degree & Career Match-Up Tool, downloaded January 7, 2020]

Completing the search for “Business Administration and Management” yields a page that provides statistics such as average salary, total employment, and job outlook. At the bottom of the page, there are two links, labeled “Find Colleges!” and “Explore Online Degrees.”

## What's the Next Step?



[Image above: links on bottom of Degree & Career Match-Up Tool search results, downloaded January 7, 2020]

Clicking on “Find Colleges!” brings site visitors to the *onlinedegrees.com* college search tool discussed above. Clicking on “Explore Online Degrees” brings site visitors to a page discussing online degree programs and the benefits of higher education. The page frequently cites the Lumina Foundation and BLS data in what appears to be an attempt to garner credibility.

## Online Degree Programs

The screenshot shows the top portion of a webpage. On the left is a sidebar with a "GET MATCHED TO A SCHOOL" section containing a dropdown menu "Where do you want to take classes?" with three options: "Online", "Campus", and "Either". Below this is a "Page Navigation" menu with three items: "Types of Online Degree Programs", "Explore Online Degree Programs", and "Benefits of Earning a Degree". The main content area on the right has a heading "Online Degree Programs" and an introductory paragraph. It then contains three sections: "Considering higher education", "Access to a variety of students", and "Did you say something about higher pay?".

[Image above: “Online Degree Programs” page, downloaded January 7, 2020]

The page also features a search tool (labeled “get matched to a school above”) that brings site visitors to the *onlinedegrees.com* college search tool. A completed search featuring many of the same schools that were listed in *schools.com* search results appears at the bottom of the page.

Showing 49 matching schools in Virginia

Prefer exploring options talking to our staff?  
Call toll free now: 1.855.330.6938

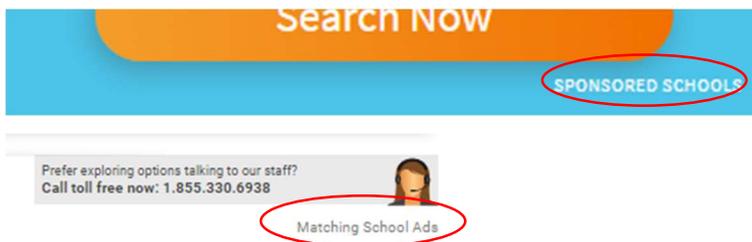
Matching School Ads

 <p><b>Daymar College</b></p> <p>Career training since 1963. Gives you the freedom and flexibility to learn on your own time, at your own pace and in your own environment. Complete your education and gain technical skills when and where it's convenient for you! Accredited by the Accrediting</p> <p><a href="#">Visit Site</a></p>	 <p><b>Ohio University - Online</b></p> <p>Ohio University has offered distance learning educational opportunities for more than 100 years. Our nationally-ranked graduate programs provide flexible opportunities to students around the globe</p> <p><a href="#">Request Info</a></p>	 <p><b>Regent University</b></p> <p>Topped the list as Best Online Bachelor's Program in Virginia by U.S. News &amp; World Report in 2019. Regent is ranked among Top National Universities by U.S. News &amp; World Report, 2019. Flexible online, on-campus and evening courses offered</p> <p><a href="#">Visit Site</a></p>
 <p><b>University of Nevada - Reno</b></p> <p>At the University of Nevada, Reno, we teach public health practitioners how to look beyond physical conditions and consider environmental, economic and sociological factors that impact individual and community health, happiness and well-being.</p> <p><a href="#">Request Info</a></p>	 <p><b>Ashford University</b></p> <p>Explore bachelor's, master's, and doctoral degrees in social science fields like psychology, applied behavioral science, sociology, cognitive studies, and public sociology. Pursue a tech degree in areas like computer software technology, cyber &amp; data</p> <p><a href="#">Visit Site</a></p>	 <p><b>George Mason University</b></p> <p>George Mason University is Virginia's largest public research university. Located near Washington, D.C., Mason enrolls more than 33,000 students from 130 countries and all 50 states. Mason has grown rapidly over the past half-century and is recognized</p> <p><a href="#">Request Info</a></p>
 <p><b>Ross Medical Education Centers</b></p> <p>Get allied health training with Ross Medical Education Center. We offer programs in dental assisting, medical assisting, medical insurance billing and office administration, and pharmacy tech.</p> <p><a href="#">Request info</a></p>	 <p><b>American InterContinental University Online</b></p> <p>You're serious about success. With your busy schedule and the desire to move your career forward, you can earn an accredited associate, bachelors or master's degree at a pace that works for you anywhere, anytime, 24/7.</p> <p><a href="#">Request Info</a></p>	 <p><b>Babson College</b></p> <p>Babson College is the premier educational institution for developing entrepreneurs of all kinds. Our AACSB-accredited graduate business programs, immersive and action-based curricula, engaged global network, and tight-knit community promote</p> <p><a href="#">Request Info</a></p>



[Images above: schools appearing at the bottom of the “Online Degree Programs” page, downloaded January 7, 2020]

The way QuinStreet presents its search tools on *onlinedegrees.com* is deceptive because they are featured throughout the website and are displayed next to articles that encourage site visitors to enroll in college. Data from reputable organizations like BLS, NCES, and Lumina is cited in these articles, but search results appear to be based on a financial relationship between QuinStreet and the schools listed. For example, the search tool appearing on the *onlinedegrees.com* homepage lists “sponsored schools” in small white text in the bottom right corner of the search box, and “matching school ads” is listed in close proximity to the search results appearing at the bottom of other *onlinedegrees.com* pages.



[Image above: advertising disclosures on *onlinedegrees.com*, downloaded January 7, 2020]

The search results at the bottom of other *onlinedegrees.com* pages are deceptive because schools are presented as being close to a site visitor’s geographic location. As the image below shows, the search results on the bottom of the “Online Degree Programs” lists “49 matching schools in Virginia.” While Regent University and George Mason University are Virginia schools, Ashford University, Ohio University, and American InterContinental University are not.



[Image above: “49 matching schools in Virginia” claim featured near onlinedegrees.com search results, downloaded January 7, 2020]

### c. *Worldwidelearn.com*

QuinStreet also operates *worldwidelearn.com*, which also publishes rankings, lists of schools by state, and advice articles.



[Image above: *worldwidelearn.com* homepage, downloaded January 7, 2020]

On its homepage, *worldwidelearn.com* states that “[e]ducation is a major investment, and like all investments it should be a well-researched decision. WorldWideLearn helps would-be students figure out how to align their interests with a career, what kind of education they might need, and whether they want to look at online or traditional, campus-based schools.” Using the “degree finder” featured in the image above yields Independence University, which, as mentioned previously, is a poor-performing school owned by an organization accused of operating fraudulent for-profit colleges.<sup>22</sup>

<sup>22</sup> David Halperin, *Troubles Compound for Predatory CollegeAmerica Chain*, HUFF. POST (Oct. 2, 2017), [https://www.huffpost.com/entry/troubles-compound-for-predatory-collegeamerica-chain\\_b\\_59ce85c7e4b0f3c468060e4a](https://www.huffpost.com/entry/troubles-compound-for-predatory-collegeamerica-chain_b_59ce85c7e4b0f3c468060e4a).



[Image above: *worldwidelearn.com* degree finder results, downloaded January 7, 2020]

Among the advice articles featured on *worldwidelearn.com* is “Beware of Fake College Accreditation: Diploma Mills and Accreditation Mills.” The article warns students about colleges with fake accreditation. It also states that “dishonest institutions and fake accrediting agencies exist to defraud students of their money and lead them to believe they’re getting something they’re not.” Ironically, despite attempting to warn students about diploma mills and accreditation concerns, the website nevertheless promotes low-quality, bad actor colleges.

## Beware of Fake College Accreditation: Diploma Mills and Accreditation Mills

You should also know how to recognize and avoid "Diploma Mills" and "Accreditation Mills," which can be harmful to your educational journey and make it difficult for you to reach your career goals. Sadly, dishonest institutions and fake accrediting agencies exist to defraud students of their money and lead them to believe they're getting something they're not.

These organizations work hard to hide that they aren't affiliated with the verified accrediting agencies. Fortunately, spotting bad accrediting agencies and schools is easy if you know what to look for.

### How do you know if a college is genuinely accredited?

First off, the U.S. Department of Education lists the accrediting agencies it certifies on its website. By visiting the site, you can browse regional and national institutional accrediting agencies, specialized accrediting agencies, and accrediting agencies recognized for Title IV purposes.

If you're seeking a degree program from an accredited institution you should only consider schools that are accredited by one of the agencies listed on the U.S. Department of Education website. If a school claims to have national accreditation or regional accreditation from somewhere else, the accreditation status might be unrecognized, and thus not worth considering.

### What constitutes a diploma mill?

Like false accrediting agencies, there are also many diploma mills. These institutions may look and seem like any other college or university, but they conduct practices that deem them unworthy in the eye of verifiable accrediting agencies and the U.S. Department of Education.

[Image above: *worldwidelearn.com* article providing a warning about “diploma mills,” downloaded January 7, 2020]

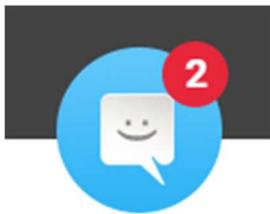
As mentioned previously, QuinStreet websites promote many for-profit colleges characterized by extremely subpar student outcomes<sup>23</sup>, low spending on instruction<sup>24</sup>, and law

<sup>23</sup> US Senate Health, Education, Labor and Pensions Committee, For Profit Higher Education: The Failure to Safeguard the Federal Investment and Ensure Student Success (Jul. 30, 2012), available at [https://www.help.senate.gov/imo/media/for\\_profit\\_report/PartI.pdf](https://www.help.senate.gov/imo/media/for_profit_report/PartI.pdf).

<sup>24</sup> Veterans Education Success, “Should Colleges Spend the GI Bill on Veterans’ Education or Late Night TV Ads?” (2019), 12, available at [https://vetsedsuccess.org/wp-content/uploads/2019/04/VES\\_Instructional\\_Spending\\_Report\\_FINAL.pdf](https://vetsedsuccess.org/wp-content/uploads/2019/04/VES_Instructional_Spending_Report_FINAL.pdf).

enforcement concerns about fraud.<sup>25</sup> In addition to promoting Independence University, QuinStreet also promotes Ashford University. There are 37 complaints against Ashford in the GI Bill Comparison Tool, and Veterans Education Success has received 108 complaints from student veterans about Ashford.<sup>26</sup> Ashford has also been subject to multiple law enforcement actions, including a 2017 lawsuit from the California Attorney General alleging fraud.<sup>27</sup> The VA’s GI Bill Comparison Tool also posted a cautionary warning on Ashford’s profile.<sup>28</sup> *Worldwidelearn.com* also promotes Colorado Technical University (“CTU”), which has a cautionary warning on the GI Bill Comparison Tool.<sup>29</sup> The VA shows 196 complaints against CTU on the GI Bill Comparison Tool, and Veterans Education Success has received 228 complaints from student veterans about CTU.<sup>30</sup>

*Worldwidelearn.com* also has a chat feature on its website. Site visitors can interact with the chat feature, which appears to be an artificial intelligence powered chatbot.



[Image above: *worldwidelearn.com* chat feature, downloaded January 7, 2020]

The chatbot asks questions about what site visitors are interested in studying, their level of education, and their zip code.

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<sup>25</sup> Veterans Education Success, “Law Enforcement Actions Against Predatory Colleges” (2019) available at <https://vetsedsuccess.org/law-enforcement-actions-against-predatory-colleges/>.

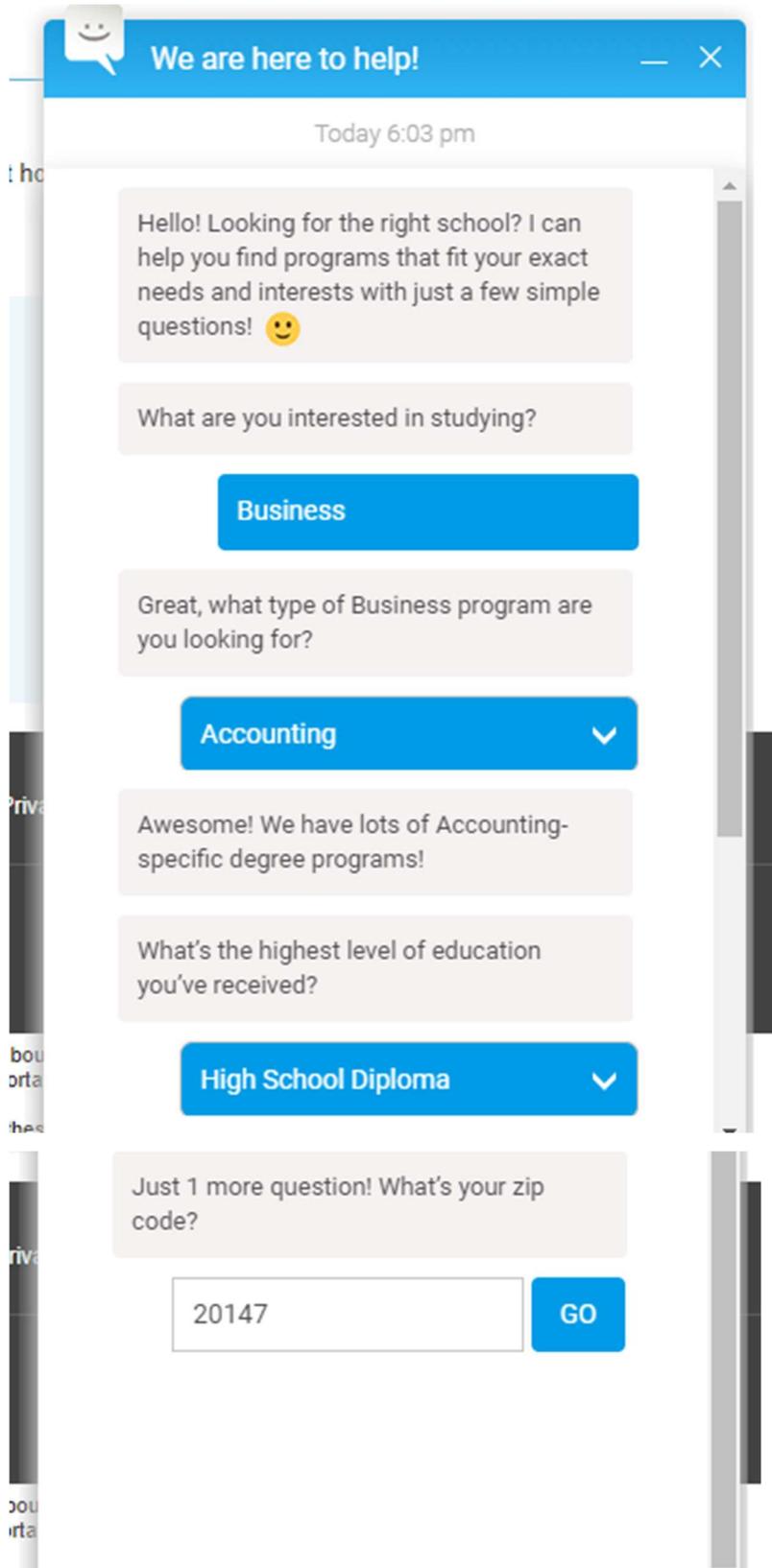
<sup>26</sup> *Ashford University*, GI BILL COMPARISON TOOL, <https://www.va.gov/gi-bill-comparison-tool/profile/21007103> (last visited Oct. 23, 2019); Veterans Education Success, “Enrollment Trends and Student Outcomes at Ashford University” (2017) available at <https://vetsedsuccess.org/enrollment-trends-and-student-outcomes-at-ashford-university/>; Veterans Education Success, “Sampling of Student Complaints at Ashford University” (2017) available at <https://vetsedsuccess.org/ves-report-sampling-of-student-complaints-about-ashford-university/>; Veterans Education Success, “Summary of Veteran and Servicemember Student Complaints about Ashford University” (2020) available at <https://vetsedsuccess.org/summary-of-veteran-and-servicemember-student-complaints-about-ashford-university/>.

<sup>27</sup> Veterans Education Success, “Law Enforcement Actions Against Predatory Colleges” (2019) available at <https://vetsedsuccess.org/law-enforcement-actions-against-predatory-colleges/>.

<sup>28</sup> *Id.*

<sup>29</sup> *Colorado Technical University*, GI BILL COMPARISON TOOL, <https://www.va.gov/gi-bill-comparison-tool/profile/21809206#viewWarnings> (last visited Jan. 8, 2020).

<sup>30</sup> *U.S. v. Career Education Corporation, et. al*, Complaint, August 27, 2019, available at [https://www.ftc.gov/system/files/documents/cases/career\\_education\\_corporation\\_complaint\\_8-27-19.pdf](https://www.ftc.gov/system/files/documents/cases/career_education_corporation_complaint_8-27-19.pdf); Veterans Education Success, “Law Enforcement Actions Against Predatory Colleges” (2019) available at <https://vetsedsuccess.org/law-enforcement-actions-against-predatory-colleges/>.



[Images above: chat feature that appears on QuinStreet websites, downloaded January 7, 2020]

After a Veterans Education Success employee responded to the chatbot's questions, it recommended "10 Campus & Online schools for Accounting in Ashburn, VA." These schools are the same that appeared in the *schools.com* college search tool search results. None are located in Ashburn, VA.

The screenshot displays a chatbot interface on the right and search results on the left. The chatbot, titled "We are here to help!", shows a conversation where it asks for a high school diploma and a zip code (20147). It then informs the user that 10 listings were found and offers to refine the search with two more questions. The search results on the left are for "Accounting In Ashburn, VA" and show two categories of results:

- 2 program(s) found** (Grand Canyon University):
  - Online Business Bachelor's Degrees From the Colangelo College of Business
  - Programs in areas such as Entrepreneurship, Finance, Management and more
  - Develop skills in areas such as statistics, organizational behavior and ethical issues
- 4 program(s) found** (Forbes School of Business & Technology):
  - Discover 31 bachelor's and master's degrees in all areas of business, including business administration, finance, Marketing, and more.
  - 24 business degree programs are accredited by the International Accreditation Council for Business Education (IACBE).
  - Business students may be eligible for scholarships

[Image above: list of schools generated by *worldwidelearn.com* chat feature, downloaded January 7, 2020]

## Showing 10 Campus & Online schools for Accounting In Ashburn, VA

Matching School Ads

Results will open in new tab



COLANGELO COLLEGE OF BUSINESS

### 2 program(s) found

- Online Business Bachelor's Degrees From the Colangelo College of Business
- Programs in areas such as Entrepreneurship, Finance, Management and more
- Develop skills in areas such as statistics, organizational behavior and ethical issues

[Read More](#)



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Accredited



Flexible Scheduling



Financial Aid

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[Visit GCU.edu](http://Visit GCU.edu)



at ASHFORD UNIVERSITY

### 4 program(s) found

- Discover 31 bachelor's and master's degrees in all areas of business, including business administration, finance, Marketing, and more.
- 24 business degree programs are accredited by the International Accreditation Council for Business Education (IACBE).
- Business students may be eligible for scholarships such

GO >

[Visit discover.ashford.edu](http://Visit discover.ashford.edu)



SAINT LEO UNIVERSITY

### 2 program(s) found

- Separate yourself from the pack by completing one of Saint Leo's highly-rated Business degree programs. Associates, Bachelors, and Graduate degrees in highly sought-after concentrations available!
- Learn the necessary skills and build the foundation to propel your business career by receiving an education from our faculty members with true real-world experience.
- Saint Leo University provides academic excellence, flexibility, affordability, and a wide range of educational programs with financial aid and scholarships available to those who qualify.

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[Visit https://www.saintleo.edu](http://Visit https://www.saintleo.edu)



PURDUE UNIVERSITY GLOBAL

### 5 program(s) found

WELCOME TO PURDUE UNIVERSITY GLOBAL  
World-Class Education Tailored for Working Adults  
Building on Purdue's mission to provide greater access to affordable, world-class education, Purdue University Global delivers a fully personalized online experience

GO >



### 5 program(s) found

- Boldly pursue your future in business with an online degree from Post University
- Degrees at all levels with concentrations in Finance, Marketing, and much more
- Ranked in the Best Online Bachelors Programs for Veterans by US News & World Report

[Read More](#)



Good for Working Adults



Accredited



Flexible Scheduling



Financial Aid

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[Visit www.post.edu](http://www.post.edu)



### 2 program(s) found

#### The Secret to Getting Ahead Is Getting Started

With a mission of helping students graduate, launch better careers, and gain greater independence to live the life they want as soon as possible, Independence University® offers flexible fully online degree programs. Program options are available in healthcare, business, information technology, and graphic arts. The programs are career-focused to help ensure the knowledge and skills you learn match what today's employers are looking for.

[Read More](#)

GO >



### 2 program(s) found

- Its Fast Track program enables qualified students to save up to 30% on tuition and graduate up to 30% faster.
- Several CTU degree programs are ranked by U.S. News & World Report for Best Online Programs in 2017.
- Lets students watch, view, read, or hear content through its program, My Unique Student Experience (M.U.S.E.).

[Read More](#)

GO >



### 3 program(s) found

- Offers MUSE (My Unique Student Experience), a content delivery system that gives students the option to watch, view, read or listen to required course materials.
- Allows students to complete courses at whatever pace they want.
- Provides IntelliPath, a proprietary learning technology that lets students learn at their own pace.

[Read More](#)



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Flexible Scheduling



Financial Aid

GO >



### 3 program(s) found

- Professionally relevant online business programs at every level – bachelor’s, master’s, MBA, PhD, and DBA.
- Specializations in accounting, business intelligence, finance, health care management, HR management, leadership, marketing, project management, and more.
- Discover FlexPath, a groundbreaking, self-paced learning option that lets you take classes at your own speed—the faster you move, the more you save.

[Read More](#)



[Visit www.capella.edu](http://www.capella.edu)

[Images above: schools recommended by *worldwidelearn.com* chat feature, downloaded January 7, 2020]

#### d. The QuinStreet websites are deceptive

The QuinStreet websites are deceptive. *Schools.com* touts its reliance on “trusted sources” to “help [site visitors] make informed decisions about [their] future.”<sup>31</sup> *Onlinedegrees.com* lists school rankings and promotes the value of higher education in articles while claiming it is relying on independent methodology and data from reputable organizations. *Worldwidelearn.com* publishes articles warning prospective students about bad actor colleges. This is likely meant to lower the guard of site visitors and to encourage them to use college search tools that are in close proximity to this information, which list schools that have a financial relationship with QuinStreet. Consumers are likely to assume that listings in the search results are based off the “trusted sources.” Instead, they are presented with a list of colleges that are most likely paying to be featured, regardless of their quality. In fact, site visitors are presented with substandard colleges that are the subject of law enforcement actions.<sup>32</sup>

Additionally, schools that are in close proximity to submitted zip codes are excluded from QuinStreet website search results. An active duty servicemember stationed at Camp Lejeune or New River seeking to use military tuition assistance or his GI Bill would likely assume that the schools listed in QuinStreet website search results are the closest schools offering the degree programs in which he is interested. Instead, consumers are presented with schools that are thousands of miles away that offer less reputable education programs. These websites fraudulently present themselves as benevolent actors looking out for consumers’ interests while advertising low-quality schools to prospective students.

<sup>31</sup> *Schools.com* homepage, QUINSTREET, <https://www.schools.com/> (last visited Jan. 13, 2020).

<sup>32</sup> Veterans Education Success, “Law Enforcement Actions Against Predatory Colleges” (2019) available at <https://vetsedsuccess.org/law-enforcement-actions-against-predatory-colleges/>.

## 2. QuinStreet is likely aware that it is promoting bad-actor schools

Evidence indicates that QuinStreet likely knows that it is promoting schools that may be subject to state and federal action. At the very bottom of QuinStreet webpages, a disclosure in very small text states, “We strive to provide information on this website that is accurate, complete, and timely, but we make no guarantees about the information, the selection of schools, school accreditation status, the availability of or eligibility for financial aid, employment opportunities or education or salary outcomes.”

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Important Information: We strive to provide information on this website that is accurate, complete and timely, but we make no guarantees about the information, the selection of schools, school accreditation status, the availability of or eligibility for financial aid, employment opportunities or education or salary outcomes. Visit [here](#) for important information on these topics.

[Image above: disclaimer appearing at the bottom of QuinStreet webpages, downloaded January 7, 2020]

Clicking on “here” in the image above brings site visitors to QuinStreet’s disclaimer webpage.<sup>33</sup>

The disclaimers state that “[p]romotional material and other school-specific information included on our websites is generally provided by or approved by the school itself. We do not, and disclaim any assertion or allegation that we do, independently verify the information provided by the schools. We rely on the Sponsored Schools to substantiate claims they make regarding their programs including claims relating to the quality of their programs, the courses they offer, enrollment requirements, availability of financial aid, tuition rates and graduation rates.”

These disclaimers demonstrate that QuinStreet knows there is a risk that some of the schools it is promoting may be providing inaccurate information because it refuses to validate the information that sponsored schools provide it for advertising. This is further supported by QuinStreet’s SEC filings. QuinStreet’s form 10-K for FY19 states that “there have been significant changes to [regulations of for-profit colleges] in recent years and a high level of regulatory scrutiny and enforcement activity,” and “[s]uch activity and scrutiny may have an adverse effect on our operating results.”<sup>34</sup> QuinStreet’s 10-K then discussed federal and state investigations into its “for-profit education clients,” and stated that “changes in, or new interpretations of, applicable laws, regulations, standards or policies applicable to these clients could have a material adverse effect on their accreditation, authorization to operate in various states, or receipt of funds under Title IV programs, any of which, in turn, may harm our ability to generate revenue from these clients and negatively impact our financial results.”<sup>35</sup> These statements coupled with QuinStreet’s disclaimers demonstrate that it is aware that it promotes proprietary institutions that engage in fraudulent activity and that are at risk of state and federal legal action. Despite these risks, QuinStreet has apparently deemed profit more important than the potential harm to consumers.

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<sup>33</sup> *QuinStreet disclaimer page*, QUINSTREET, <https://www.schools.com/hqedu/schools.com/disclaimer.php> (last visited March 18, 2020).

<sup>34</sup> QuinStreet, Annual Report (Form 10-K), Jun. 30, 2019, 11, available at <https://investor.quinstreet.com/static-files/a372da0f-32fe-408a-9824-8f63e56b2d0d>.

<sup>35</sup> *Id.*

These disclaimers also help QuinStreet websites to deceive consumers. QuinStreet websites claim that they are relying on “trusted sources” and that they “[help] would-be students figure out...what kind of education they might need,”<sup>36</sup> but as shown by the disclaimers above, the schools presented by QuinStreet in its college searches are not actually vetted. QuinStreet relies on sponsored schools “to substantiate claims they make regarding their programs including claims relating to the quality of their programs, the courses they offer, enrollment requirements, availability of financial aid, tuition rates and graduation rates.” This is a bait and switch. QuinStreet is purporting to offer unbiased and comprehensive advice on higher education, but actually providing lists of unvetted schools that pay to appear in college search results.

### **3. QuinStreet targets veterans and servicemembers**

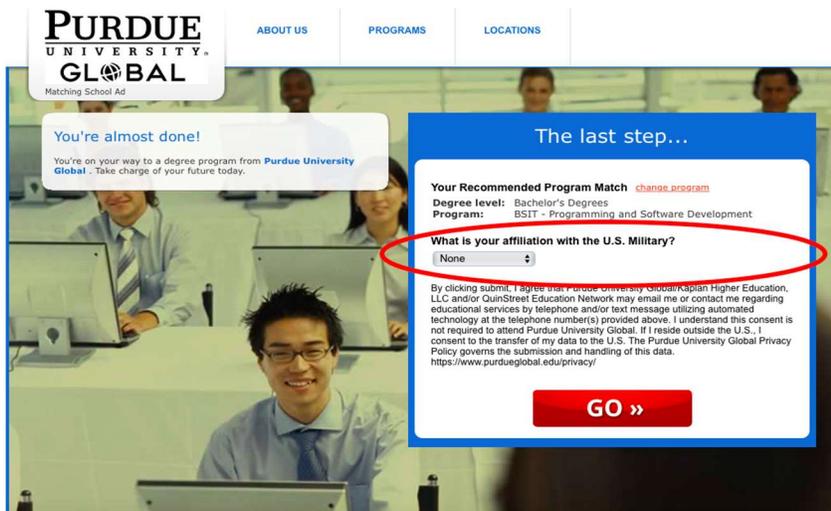
QuinStreet targets veterans and servicemembers. Under the 90/10 rule, for-profit colleges must not receive more than 90 percent of their revenue from Title IV funding and must obtain 10 percent of their revenue from non-Title IV sources, a requirement intended to impose a market viability test by ensuring taxpayers are not propping up otherwise failing schools.<sup>37</sup> However, the 90/10 rule contains a loophole: military education benefits do not fall under Title IV and for-profit colleges have manipulated this loophole to count military benefits toward the 10 percent requirement, as if they were private sources of financing. For-profit colleges use GI Bill and military tuition assistance to offset the cap they otherwise face on federal funds. As Holly Petraeus, the former head of servicemember affairs at the US Consumer Financial Protection Bureau, wrote, “This gives for-profit colleges an incentive to see servicemembers as nothing more than dollar signs in uniform.”<sup>38</sup> Hence, it is not an innocent inquiry when a lead generator website asks for information about military affiliation. The QuinStreet websites are not generating a list of high-quality schools for servicemembers and veterans. Instead, the websites are producing a list of low-quality, for-profit colleges in exchange for financial gain. The image below shows that websites operated by QuinStreet continue to inquire about military affiliation when generating a list of schools for website users.

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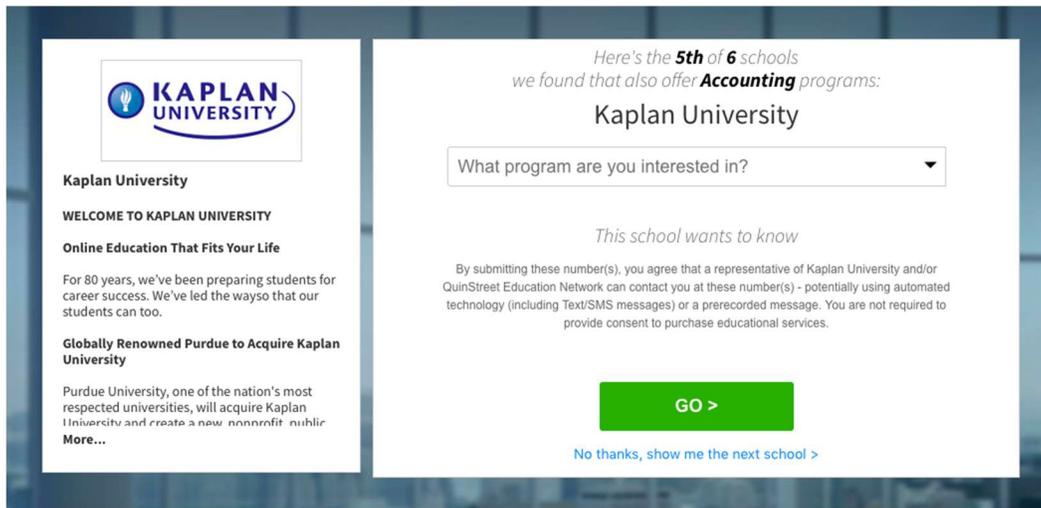
<sup>36</sup> *Schools.com* homepage, QUINSTREET, <https://www.schools.com/> (last visited Jan. 13, 2020).

<sup>37</sup> *90/10 Rule*, FINAID, <http://www.finaid.org/loans/90-10-rule.phtml> (last visited Oct. 23, 2019).

<sup>38</sup> Hollister K. Petraeus, *For-Profit Colleges, Vulnerable G.I.'s*, NEW YORK TIMES (Sep. 21, 2011), <https://www.nytimes.com/2011/09/22/opinion/for-profit-colleges-vulnerable-gis.html>.



[Image above: military affiliation inquiry on QuinStreet website, downloaded October 8, 2018]



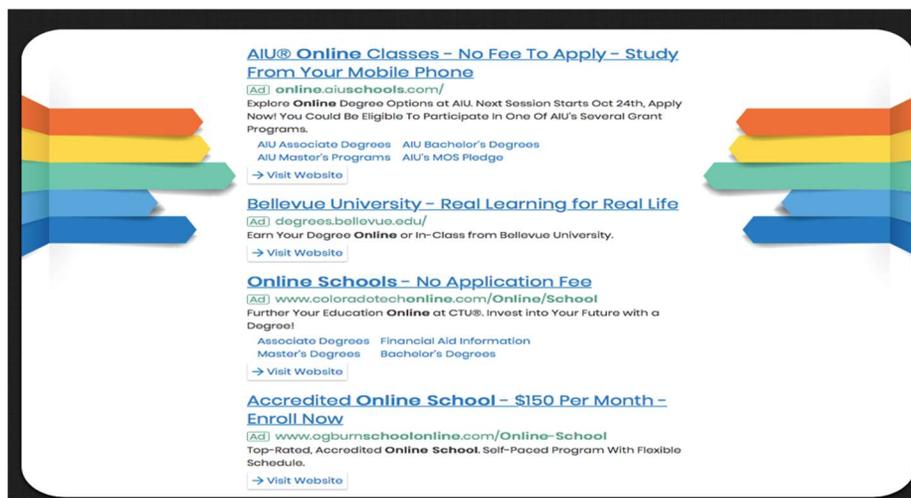
[Image above: military affiliation inquiry on getinfo.computertrainingschools.com, downloaded October 9, 2018]

#### 4. QuinStreet is likely violating the 2012 settlement

In addition to targeting veterans and servicemembers, QuinStreet is likely out of compliance with its 2012 settlement agreement with 20 state attorneys general. The 2012 settlement agreement states that “...all **QuinStreet Education-related Websites** wherein a list or grouping of schools is displayed together on a website in response to a query, criteria or search on that website, **QuinStreet** shall provide the following: (1) A **Clear and Conspicuous** disclosure appearing at the top of each presented list or grouping of schools on each website that reads ‘Sponsored Listing,’ ‘Sponsored Results,’ ‘Matching Ads,’ ‘Matching School Ads,’ or ‘Ads’ or similar terms **Clearly and Conspicuously** disclosing that the presented

schools are paying consideration to be presented; (2) A **Clear and Conspicuous** disclosure appearing at the bottom of each presented list or grouping of schools on each website that reads ‘Sponsored Listing,’ ‘Sponsored Results,’ ‘Matching Ads,’ ‘Matching School Ads,’ or ‘Ads’ or similar terms **Clearly and Conspicuously** disclosing that the presented schools are paying consideration to be presented; (3) If the listing is of a significant number of schools such that it comprises multiple pages, a **Clear and Conspicuous** disclosure appearing at the top and bottom of each list of schools on each page that reads ‘Sponsored Listing,’ ‘Sponsored Results,’ ‘Matching Ads,’ ‘Matching School Ads,’ or ‘Ads’ or similar terms **Clearly and Conspicuously** disclosing that the presented schools are paying consideration to be presented.”<sup>39</sup> According to the settlement, clear and conspicuous means that “[t]he required disclosures shall be easily readable; in a high degree of contrast from the immediate background on which it appears... [and] in a format so that the disclosure is distinct from other text; in a type style, such as **bold, italicized, underscored, colored, bordered** or such other type style that has **the effect of making the text easily readable.**”<sup>40</sup> QuinStreet’s websites fail to meet this requirement.

QuinStreet websites often provide no clear and conspicuous disclosures indicating that lists of schools are sponsored in any way. These search results should be accompanied by clear and conspicuous disclosures because all facts point to the conclusion that the schools listed do in fact pay QuinStreet for the promotion. Specifically, it is known that QuinStreet operates these websites in order to serve as a lead generator<sup>41</sup> and that these schools pay lead generators for promotion.<sup>42</sup>



<sup>39</sup> These states include Alabama, Arizona, Arkansas, Delaware, Florida, Idaho, Illinois, Iowa, Kentucky, Massachusetts, Mississippi, Missouri, Nevada, New York, North Carolina, Ohio, Oregon, South Carolina, Tennessee, and West Virginia. Securities and Exchange Commission, “Assurance of Voluntary Compliance” (2012), available at <https://www.sec.gov/Archives/edgar/data/1117297/000119312512284713/d372925dex101.htm>.

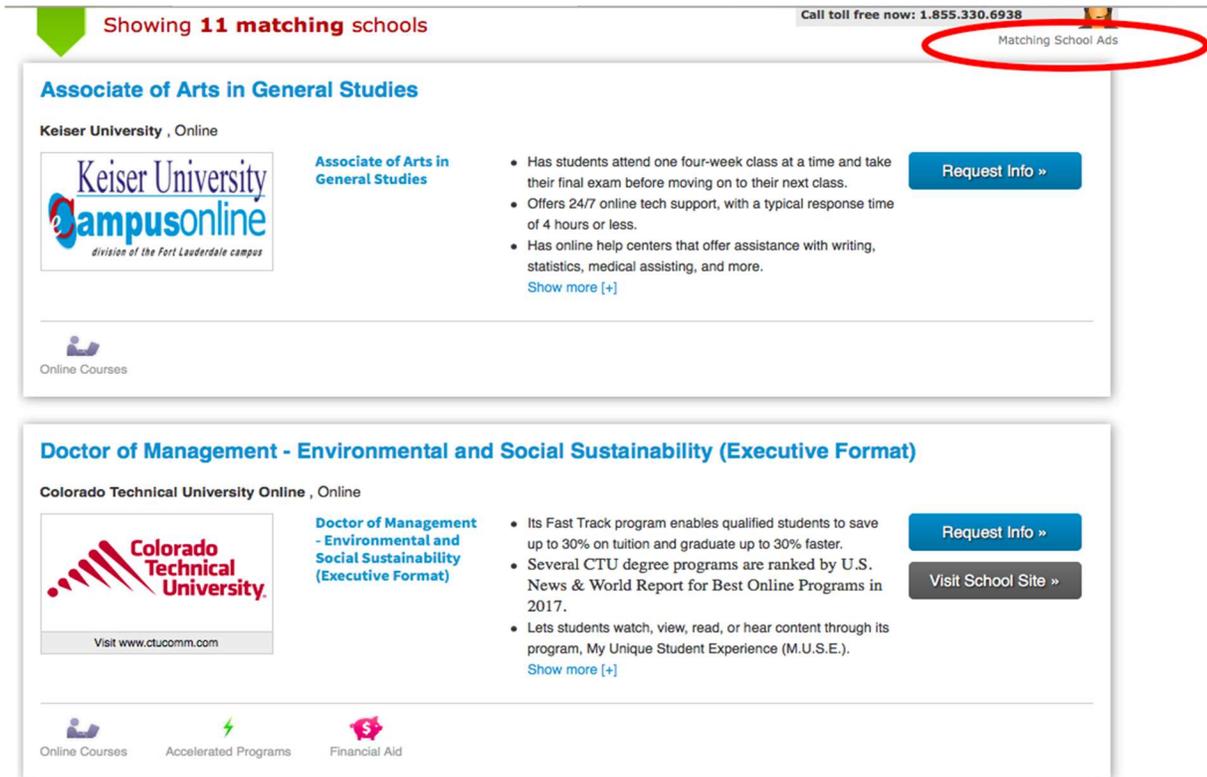
<sup>40</sup> *Id.*

<sup>41</sup> QuinStreet, Annual Report (Form 10-K), Jun. 30, 2019, 3, available at <https://investor.quinstreet.com/static-files/a372da0f-32fe-408a-9824-8f63e56b2d0d>.

<sup>42</sup> Veterans Education Success, “Army.com List of Partner Schools Revealed” (2019), available at <https://vetsedsuccess.org/army-com-list-of-partner-schools/>.

[Image above: schools featured on *collegedegrees.sale* without a clear and conspicuous disclosure, downloaded October 8, 2018]

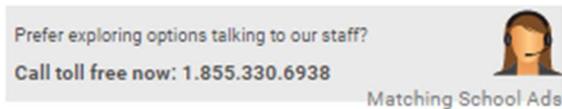
In some cases, *schools.com* provides some disclosure, but it is inadequate. The image below shows that QuinStreet included “Matching School Ads” in small and grey text in the upper right hand corner of the screen. A visitor to this website would likely overlook this disclosure unless they are actively looking for it. It is not clear and conspicuous.



[Image above: “Matching School Ads” disclosure on *onlineschools.com*, downloaded September 11, 2018]

The “Matching School Ads” disclosure on *schools.com* appears in a grey box along with contact information for a QuinStreet call center. The text for a phone number<sup>43</sup> is bold, while the “Matching School Ads” text is a faded grey and below an image of a call person.

<sup>43</sup> A Veterans Education Success employee called this number, and a QuinStreet call person answered. The call person would not provide information about colleges until the employee provided personal information, such as his full name, phone number, email address, and home address. The call person would also not provide any information unless the employee consented to being contacted by QuinStreet. When the employee asked about colleges near Camp Lejeune, NC, the call person provided him with information about Miller-Motte College, a for-profit college with a campus in Jacksonville, NC. When the employee asked about other colleges, the call person stated that there were no other colleges in her system. This Miller-Motte location has a cautionary warning on the Department of Veterans Affairs’ GI Bill Comparison Tool stating, “Significantly out of compliance - student achievement.” *Miller-*



[Image above: “Matching School Ads” disclosure on schools.com, downloaded November 12, 2019]

The “Matching School Ads” disclosures are not “bold, italicized, underscored, colored, bordered or such other type style that has the effect of making the text easily readable.” Instead, the text of the disclosures is light grey, which is more difficult to read and easy to overlook, whereas QuinStreet’s phone number is bold. QuinStreet is emphasizing the text of its call center number when it should be emphasizing the text of its advertising disclosure. In addition, the disclosure on *schools.com* is not “in a high degree of contrast from the immediate background on which it appears,” but instead made to appear as if it were part of the grey box featuring QuinStreet’s call center number.

The agreement also prohibits QuinStreet from including quality claims on its website unless it references an independent source in making the claim. QuinStreet is prohibited from stating that a school is “the ‘best’ or the ‘top’” or “that the school, program, or course of study best meets the needs of the prospective student, e.g., ‘is right for you’ or ‘best meets your needs’” unless QuinStreet lists an independent source “near or linked to the quality or ranking claim.”<sup>44</sup> However, *schools.com* features the text “Find A School that’s Right for You!” above its school search tool without listing an independent source to support the claim that the search results will yield a school that’s “right” for a site visitor.

Home » Schoolfinder

## Find a School that's Right for You!

SUBJECT	DEGREE	PROGRAM TYPE	START TIME
<input checked="" type="checkbox"/> All <a href="#">Clear All</a>	<input type="checkbox"/> No Preference	<input checked="" type="radio"/> Both	<input checked="" type="radio"/> No Preference

[Image above: quality claim above schools.com search tool, downloaded November 12, 2019]

Most importantly, the agreement states that “[n]o QuinStreet Education-related Websites shall make any claim or representation that is false, misleading, or deceptive.”<sup>45</sup> The agreement specifically cites “falsely stating or implying that the list of schools provided in response to a search request was the exclusive list of schools meeting the consumer’s search criteria, when in

Motte College – Jacksonville, GI BILL COMPARISON TOOL, <https://www.va.gov/gi-bill-comparison-tool/profile/24911833> (last visited Nov. 12, 2019).

<sup>44</sup> Securities and Exchange Commission, “Assurance of Voluntary Compliance” (2012), available at <https://www.sec.gov/Archives/edgar/data/1117297/000119312512284713/d372925dex101.htm>.

<sup>45</sup> *Id.*

fact only QuinStreet client schools were identified” as deceptive conduct by QuinStreet and part of the factual basis of the states’ allegations.<sup>46</sup> QuinStreet fails to meet this criteria. As mentioned previously in this petition, QuinStreet websites are implied to be an exclusive list of schools meeting consumers’ search criteria (closest schools by zip code), when in fact only QuinStreet client schools are identified.<sup>47</sup> The evidence listed above shows that QuinStreet has made multiple claims and representations that are false, misleading, and deceptive. For these reasons, QuinStreet is likely in violation of the 2012 settlement.

In conclusion, it is clear that by operating such websites, QuinStreet is doing a disservice to our servicemembers and veterans by promoting overpriced, low-quality colleges, most likely in exchange for payment to QuinStreet without adequate disclosure of the paid relationship.

## **B. Reach Network, Inc.**

Reach Network, Inc., is a for-profit company headquartered in Kirkland, WA.<sup>48</sup> Reach Network has multiple trade names, including “SR Education Group.”<sup>49</sup> Reach Network uses the SR Education Group trade name on the website *sreducationgroup.org*, where it lists school rankings, offers scholarships to students, and provides advertising services to colleges. Reach Network operates four other websites, including *guidetoonlineschools.com*, *gradreports.com*, *onlineu.org*, and *graduateprograms.com*, which it refers to as “products.” Each website is operated under the SR Education Group trade name.

SR Education Group attempts to hide its for-profit corporate ownership. SR Education Group is presented as a non-profit organization, as demonstrated by its “.org” domain name and the following “mission” posted on its website: “At SR Education Group, we are motivated by a singular vision: a world where students get the education they need to be successful.” As mentioned above, SR Education Group is a trade name for Reach Network. Despite the “.org” domain name and this mission statement, SR Education Group is a for-profit company.



[Image above: SR Education Group website, downloaded October 7, 2019]

<sup>46</sup> *Id.*

<sup>47</sup> *Id.* at 8-13.

<sup>48</sup> *Corporation and Charities Filing System*, WASHINGTON STATE OFFICE OF THE SECRETARY OF STATE, <https://ccfs.sos.wa.gov/#/BusinessSearch/BusinessInformation> (last visited Nov. 12, 2019).

<sup>49</sup> *Reach Network, Inc.*, WASHINGTON STATE DEPARTMENT OF REVENUE, [https://secure.dor.wa.gov/gteunauth/\\_/#4](https://secure.dor.wa.gov/gteunauth/_/#4) (last visited Nov. 12, 2019).

## Mission

At SR Education Group, we are motivated by a singular vision: a world where students get the education they need to be successful.



[Image above: SR Education Group mission, downloaded October 7, 2019]

## Products

Our products are designed to help prospective students find a college suited to their individual needs, whether that means low tuition costs, high satisfaction reported by recent graduates, or degrees that lead to career advancement. We feature schools with great student reviews and strong success metrics, and provide unbiased, comprehensive information.

[Image above: SR Education Group “products” description, downloaded October 7, 2019]

SR Education Group is presented as a resource for students, providing “unbiased” and “comprehensive” information. However, clicking on the “Contact Us” tab brings visitors to the following advertising page.

Contact

Interested in advertising with us? Visit our [advertising page](#) for more information.

Name

Email

Your Message

Send Message

[Image above: SR Education Group advertising link, downloaded October 7, 2019]

Clicking on the “advertising” link brings visitors to a page that provides information to schools about SR Education Group’s advertising services.<sup>50</sup> It lists “premium referral listings,” logos of schools that use SR Education Group, and endorsements from “partners.”

<sup>50</sup> Advertising, SR EDUCATION GROUP, <https://www.sreducationgroup.org/advertising> (last visited Oct. 23, 2019).

# Advertising

## Use Our School Listings to Connect With Students

With unique content features and search filters, we help more than 200,000 students each month match themselves to the schools that best meet their needs. Our education directories provide schools with the opportunity of placing their brand in front of this highly-engaged, prospective student audience.

Interested in generating responses?



[Image above: SR Education Group advertising page, downloaded October 7, 2019]

### Who Uses SR Education Group?



### What Our Partners Are Saying

"Over 7 years we have tested hundreds of lead sources for dozens of institutions .... I can say without hesitation that SR Education Group is the best source we have ever used."

- Dave T., VP | Barker Educational Services Team

"SR Education Group is one of our best converting vendors, due to the fact that their traffic is organic and high quality .... They have been a great contributor to the success of our University."

- Diana I., Media Buyer | Laureate Education

[Image above: SR Education Group advertising page, downloaded October 7, 2019]

Under the "What Our Partners Are Saying" heading, reviews are provided by people affiliated with for-profit colleges. Barker Education Services was founded by Bob Barker, a former Senior Executive Vice President for the Apollo Group, Inc.<sup>51</sup> Apollo Group owned and operated the University of Phoenix for many years, until 2017.<sup>52</sup> Laureate Education, Inc., is a "public benefit corporation" based in Baltimore, MD, that operates a network of colleges throughout the world.<sup>53</sup> In the United States, it owns and operates Walden University, a for-profit college.<sup>54</sup>

SR Education Group highlights the benefits of using its advertising services, including providing schools with high visibility and driving applications and enrollments.

<sup>51</sup> Barker Educational Services Team, LINKEDIN, <https://www.linkedin.com/company/barker-educational-services-team> (last visited Oct. 23, 2019).

<sup>52</sup> About, APOLLO EDUCATION GROUP, <https://www.apollo.edu/about.html> (last visited Apr. 21, 2020); Company Information, APOLLO EDUCATION GROUP, <https://www.apollo.edu/company-information.html> (last visited Apr. 21, 2020).

<sup>53</sup> About Laureate, LAUREATE INTERNATIONAL UNIVERSITIES, <https://www.laureate.net/aboutlaureate/> (last visited Oct. 23, 2019).

<sup>54</sup> Walden University, LAUREATE INTERNATIONAL UNIVERSITIES, <https://www.laureate.net/school/walden-university/> (last visited Oct. 23, 2019).

Upgrade from a directory listing by adding a contact form.

## Benefits:

### Highest Visibility

Display above Standard Directory Listings for all relevant search results and subject pages.

### Drive Applications & Enrollments

Put students in direct contact with your admissions team. Customize form questions and receive referrals in real-time.

### Full Control & Compliance

Modify your listing, copy, and form at any time. Our team processes most requests within 24 hours.

### Responsible Marketing Guarantee

Our 100% search engine traffic brings in students from all stages of the school decision-making process, a focused and high-converting audience.

### Flexible & Cost-Effective

Set the guidelines for your campaign, then let us handle the rest. With no starting or maintenance costs, pay only for the valid referrals you receive.



[Image above: SR Education Group advertising page, downloaded October 7, 2019]

In order to get information about specific pricing and rate details, schools must contact SR Education Group directly.

## Frequently Asked Questions

### How much will it cost?

Contact us for specific pricing and rate details. Premium Referral Listings are built around per-referral pricing and can support everything from capped monthly budgets to unlimited delivery. Designed to accommodate a wide-range of marketing budgets, our listings run month-to-month, do not feature start-up charges, and do not have minimum time or spend requirements.

### How do you bring in traffic?

Our traffic comes from search engine marketing, a by-product of our focus on building education portals that are both comprehensive and functional. When a prospective student searches for phrases like "online schools", you will see us near the top in Google, Yahoo, and Bing. These organic rankings drive the vast majority of our traffic numbers, but we also run pay-per-click marketing in the above search engines to augment volume. We have a Responsible Marketing Guarantee, avoiding marketing tactics and channels that do not contribute to a positive user experience. Rest assured that our traffic is among the cleanest and highest-performing in the industry.

[Image above: SR Education Group advertising page, downloaded October 7, 2019]

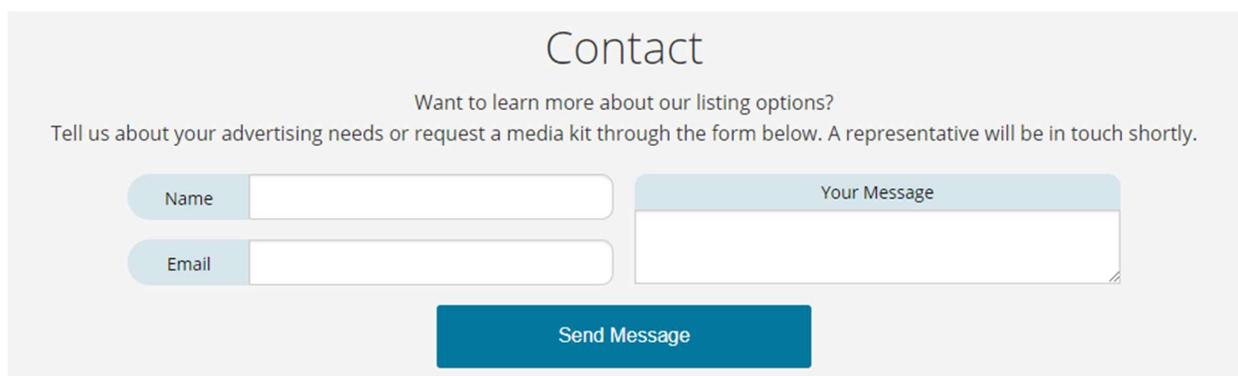
**How do I make changes to my listing? What if I want to cancel?**

Advertising listings can be updated at any time. To make changes, notify us by phone or by e-mail and our account team will process the request. Our team is also on hand to provide reports and suggestions on how to improve performance. Turning off a listing is also simple; let us know by phone or by e-mail and the account team will handle the deactivation. Listings can be reactivated through the same contact methods.

**How do I get started with my school listing?**

Great! Moving forward with a listing is as simple as providing us with your set of programs, school logo, and authorization. For Premium Referral Listings, our account team will clarify instructions for delivering referrals into your system. Our typical turn-around time is 2-3 days for new schools.

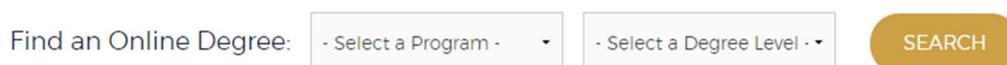
[Image above, SR Education Group advertising page, downloaded October 7, 2019]



The image shows a contact form titled "Contact". Below the title, it asks "Want to learn more about our listing options?" and "Tell us about your advertising needs or request a media kit through the form below. A representative will be in touch shortly." The form includes three input fields: "Name", "Email", and "Your Message". Below these fields is a blue "Send Message" button.

[Image above, SR Education Group advertising page, downloaded October 7, 2019]

While SR Education Group does not provide details on how it helps schools achieve “highest visibility” to drive applications and enrollments, schools are promoted on its websites through various misleading ways. For example, a search bar frequently appears on SR Education Group websites:



The image shows a search bar with the text "Find an Online Degree:". To the right of this text are two dropdown menus: "- Select a Program -" and "- Select a Degree Level -". To the right of the dropdown menus is a gold "SEARCH" button.

[Image above: SR Education Group college search bar, downloaded October 7, 2019]

Visitors can search for schools by degree and program. Schools including Ashford University, Purdue University Global, Grand Canyon University, and Walden University appear in the search results if a visitor searches for schools that offer bachelor’s degrees in accounting.

<p><b>REFINE YOUR SEARCH</b></p> <p>Most Affordable (11)</p> <p>Non-Profit Schools (20)</p> <p>Military Benefits (7)</p> <p><b>Level</b> <span style="float:right">-</span></p> <p>Bachelor's (X)</p>	 <p><b>Ashford University</b></p> <p>Request Information</p>	<p><b>Ashford University</b></p> <p>121 Programs, 24 Bachelor's in Business (view all)</p> <ul style="list-style-type: none"> <li>BA/Accounting</li> <li>BA/Business Administration</li> <li>BA/Business Economics</li> <li>BA/Business Information Systems</li> </ul> <p><b>Annual Tuition:</b> \$10,632 - \$13,400  <b>Recommendation Rate:</b> 67%</p> <p>Low Tuition Recommended</p> <p><a href="#">Learn More »</a></p>
<p><b>REFINE YOUR SEARCH</b></p> <p>Most Affordable (11)</p> <p>Non-Profit Schools (20)</p> <p>Military Benefits (7)</p> <p><b>Level</b> <span style="float:right">-</span></p> <p>Bachelor's (X)</p>	 <p><b>Purdue University Global</b></p> <p>Request Information</p>	<p><b>Purdue University Global</b></p> <p>144 Programs, 24 Bachelor's in Business (view all)</p> <ul style="list-style-type: none"> <li>BS in Business Administration</li> <li>BSBA - Procurement</li> <li>BSBA - Sales Management</li> <li>BS in Finance</li> </ul> <p><b>Annual Tuition:</b> \$11,581 - \$16,246</p> <p>Low Tuition Non-Profit</p> <p><a href="#">Learn More »</a></p>
<p><b>REFINE YOUR SEARCH</b></p> <p>Most Affordable (11)</p> <p>Non-Profit Schools (20)</p> <p>Military Benefits (7)</p> <p><b>Level</b> <span style="float:right">-</span></p> <p>Bachelor's (X)</p>	 <p><b>ASU Online</b> Arizona State University</p> <p>Request Information</p>	<p><b>Arizona State University</b></p> <p>181 Programs, 26 Bachelor's in Business (view all)</p> <ul style="list-style-type: none"> <li>BA in Business - Sustainability</li> </ul> <p><b>Annual Tuition:</b> \$25,980  <b>Recommendation Rate:</b> 29%</p> <p>Recommended Non-Profit</p> <p><a href="#">Learn More »</a></p>
<p><b>REFINE YOUR SEARCH</b></p> <p>Most Affordable (11)</p> <p>Non-Profit Schools (20)</p> <p>Military Benefits (7)</p> <p><b>Level</b> <span style="float:right">-</span></p> <p>Bachelor's (X)</p>	 <p><b>INDIANA WESLEYAN UNIVERSITY</b></p> <p>Request Information</p>	<p><b>Indiana Wesleyan University Online - Adult Education</b></p> <p>50 Programs, 11 Bachelor's in Business (view all)</p> <ul style="list-style-type: none"> <li>B.S. Accounting</li> <li>B.S. Business Administration - Human Resource Management</li> <li>B.S. Business Administration - No Specialization</li> <li>B.S. Business Administration - Personal Financial Planning</li> </ul> <p><b>Annual Tuition:</b> \$17,240  <b>Recommendation Rate:</b> 52%</p> <p>Non-Profit</p> <p><a href="#">Learn More »</a></p>
<p><b>REFINE YOUR SEARCH</b></p> <p>Most Affordable (11)</p> <p>Non-Profit Schools (20)</p> <p>Military Benefits (7)</p> <p><b>Level</b> <span style="float:right">-</span></p> <p>Bachelor's (X)</p>	 <p><b>CENTRAL CHRISTIAN COLLEGE OF KANSAS</b></p> <p>Request Information</p>	<p><b>Central Christian College of Kansas</b></p> <p>14 Programs, 3 Bachelor's in Business (view all)</p> <ul style="list-style-type: none"> <li>Bachelor of Business Administration</li> <li>BS in Business in Organizational Leadership</li> <li>BS in Healthcare Administration</li> </ul> <p><b>Annual Tuition:</b> \$17,050</p> <p>Non-Profit</p> <p><a href="#">Learn More »</a></p>
<p><b>REFINE YOUR SEARCH</b></p> <p>Most Affordable (11)</p> <p>Non-Profit Schools (20)</p> <p>Military Benefits (7)</p> <p><b>Level</b> <span style="float:right">-</span></p> <p>Bachelor's (X)</p>	 <p><b>GRAND CANYON UNIVERSITY</b></p> <p>Request Information</p>	<p><b>Grand Canyon University</b></p> <p>143 Programs, 12 Bachelor's in Business (view all)</p> <ul style="list-style-type: none"> <li>BS in Business Administration</li> <li>BS in Business for Secondary Education</li> <li>BS in Accounting</li> <li>BS in Applied Business Analytics</li> </ul> <p><b>Annual Tuition:</b> \$17,050  <b>Recommendation Rate:</b> 52%</p> <p>Non-Profit</p> <p><a href="#">Learn More »</a></p>
<p><b>REFINE YOUR SEARCH</b></p> <p>Most Affordable (11)</p> <p>Non-Profit Schools (20)</p> <p>Military Benefits (7)</p> <p><b>Level</b> <span style="float:right">-</span></p> <p>Bachelor's (X)</p>	 <p><b>WALDEN UNIVERSITY</b> <i>A higher degree. A higher purpose.</i></p> <p>Request Information</p>	<p><b>Walden University</b></p> <p>253 Programs, 9 Bachelor's in Business (view all)</p> <ul style="list-style-type: none"> <li>BS in Business Administration - Accounting</li> <li>BS in Business Administration - Finance</li> <li>BS in Business Administration - General</li> <li>BS in Business Administration - Healthcare Management</li> </ul> <p><b>Annual Tuition:</b> Not Provided  <b>Recommendation Rate:</b> 49%</p> <p><a href="#">Learn More »</a></p>

<p><b>REFINE YOUR SEARCH</b></p> <p>Most Affordable (11)</p> <p>Non-Profit Schools (20)</p> <p>Military Benefits (7)</p> <p><b>Level</b> <span style="float: right;">-</span></p> <p>Bachelor's (X)</p>	<div style="display: flex; justify-content: space-between; align-items: center;">  <div style="text-align: right;"> <p><b>Waldorf University</b></p> <p>57 Programs, 9 Bachelor's in Business (view all)</p> <ul style="list-style-type: none"> <li>◦ Bachelor of Arts Communications</li> <li>◦ Bachelor of Arts Public Relations</li> <li>◦ Bachelor of Science Business Administration</li> <li>◦ Bachelor of Science Business Administration/Human Resource Management</li> </ul> <p><b>Annual Tuition:</b> \$8,700</p> <p><b>Recommendation Rate:</b> 100%</p> <p style="text-align: right;"><a href="#">Learn More »</a></p> </div> <div style="text-align: right;"> <p> Low Tuition</p> <p> Recommended</p> </div> </div> <p style="text-align: center; margin-top: 10px;"><a href="#">Request Information</a></p>
<p><b>REFINE YOUR SEARCH</b></p> <p>Most Affordable (11)</p> <p>Non-Profit Schools (20)</p> <p>Military Benefits (7)</p> <p><b>Level</b> <span style="float: right;">-</span></p> <p>Bachelor's (X)</p>	<div style="display: flex; justify-content: space-between; align-items: center;">  <div style="text-align: right;"> <p><b>Liberty University</b></p> <p>414 Programs, 24 Bachelor's in Business (view all)</p> <ul style="list-style-type: none"> <li>◦ BS: Accounting</li> <li>◦ BS: Business Admin: Automotive Dealership Management</li> <li>◦ BS: Business Admin: Communications</li> <li>◦ BS: Business Admin: Digital Marketing &amp; Advertising</li> </ul> <p><b>Annual Tuition:</b> \$11,700</p> <p><b>Recommendation Rate:</b> 59%</p> <p style="text-align: right;"><a href="#">Learn More »</a></p> </div> <div style="text-align: right;"> <p> Low Tuition</p> <p> Non-Profit</p> <p> Military Friendly</p> </div> </div> <p style="text-align: center; margin-top: 10px;"><a href="#">Request Information</a></p>
<p><b>REFINE YOUR SEARCH</b></p> <p>Most Affordable (11)</p> <p>Non-Profit Schools (20)</p> <p>Military Benefits (7)</p> <p><b>Level</b> <span style="float: right;">-</span></p> <p>Bachelor's (X)</p>	<div style="display: flex; justify-content: space-between; align-items: center;">  <div style="text-align: right;"> <p><b>Southern New Hampshire University Online</b></p> <p>137 Programs, 28 Bachelor's in Business (view all)</p> <ul style="list-style-type: none"> <li>◦ BA Communication</li> <li>◦ BA Communication - New Media</li> <li>◦ BA Communication - Professional Writing</li> <li>◦ BA Communication - Public Relations</li> </ul> <p><b>Annual Tuition:</b> \$11,520</p> <p><b>Recommendation Rate:</b> 61%</p> <p style="text-align: right;"><a href="#">Learn More »</a></p> </div> <div style="text-align: right;"> <p> Low Tuition</p> <p> Recommended</p> <p> Non-Profit</p> </div> </div> <p style="text-align: center; margin-top: 10px;"><a href="#">Request Information</a></p>
<p><b>REFINE YOUR SEARCH</b></p> <p>Most Affordable (11)</p> <p>Non-Profit Schools (20)</p> <p>Military Benefits (7)</p> <p><b>Level</b> <span style="float: right;">-</span></p> <p>Bachelor's (X)</p>	<div style="display: flex; justify-content: space-between; align-items: center;">  <div style="text-align: right;"> <p><b>Saint Leo University Online</b></p> <p>78 Programs, 5 Bachelor's in Business (view all)</p> <ul style="list-style-type: none"> <li>◦ B.A. in Business Administration - Accounting Specialization</li> <li>◦ B.A. in Business Administration - Logistics</li> <li>◦ B.A. in Business Administration - Management</li> <li>◦ B.A. in Business Administration - Marketing</li> </ul> <p><b>Annual Tuition:</b> \$22,220</p> <p><b>Recommendation Rate:</b> 68%</p> <p style="text-align: right;"><a href="#">Learn More »</a></p> </div> <div style="text-align: right;"> <p> Recommended</p> <p> Non-Profit</p> </div> </div> <p style="text-align: center; margin-top: 10px;"><a href="#">Request Information</a></p>
<p><b>REFINE YOUR SEARCH</b></p> <p>Most Affordable (11)</p> <p>Non-Profit Schools (20)</p> <p>Military Benefits (7)</p> <p><b>Level</b> <span style="float: right;">-</span></p> <p>Bachelor's (X)</p>	<div style="display: flex; justify-content: space-between; align-items: center;">  <div style="text-align: right;"> <p><b>Colorado State University-Global Campus</b></p> <p>38 Programs, 7 Bachelor's in Business (view all)</p> <ul style="list-style-type: none"> <li>◦ BS - Accounting</li> <li>◦ BS - Business Management</li> <li>◦ BS - Human Resource Management</li> <li>◦ BS - Management Information Systems and Business Analytics</li> </ul> <p><b>Annual Tuition:</b> \$9,000</p> <p><b>Recommendation Rate:</b> 55%</p> <p style="text-align: right;"><a href="#">Learn More »</a></p> </div> <div style="text-align: right;"> <p> Low Tuition</p> <p> Non-Profit</p> <p> Military Friendly</p> </div> </div> <p style="text-align: center; margin-top: 10px;"><a href="#">Request Information</a></p>
<p><b>REFINE YOUR SEARCH</b></p> <p>Most Affordable (11)</p> <p>Non-Profit Schools (20)</p> <p>Military Benefits (7)</p> <p><b>Level</b> <span style="float: right;">-</span></p> <p>Bachelor's (X)</p>	<div style="display: flex; justify-content: space-between; align-items: center;">  <div style="text-align: right;"> <p><b>Columbia Southern University</b></p> <p>41 Programs, 12 Bachelor's in Business (view all)</p> <ul style="list-style-type: none"> <li>◦ B.S. Business Administration</li> <li>◦ B.S. Business Administration-Finance</li> <li>◦ B.S. Business Administration-Hospitality and Tourism</li> <li>◦ B.S. Business Administration-Human Resource Management</li> </ul> <p><b>Annual Tuition:</b> \$6,600</p> <p><b>Recommendation Rate:</b> 81%</p> <p style="text-align: right;"><a href="#">Learn More »</a></p> </div> <div style="text-align: right;"> <p> Low Tuition</p> <p> Recommended</p> <p> Military Friendly</p> </div> </div> <p style="text-align: center; margin-top: 10px;"><a href="#">Request Information</a></p>

<p>Most Affordable (11)</p> <p>Non-Profit Schools (20)</p> <p>Military Benefits (7)</p> <p><b>Level</b> -</p> <p>Bachelor's (X)</p>	 <p><b>Request Information</b></p>	<p><b>Regent University Online</b>  Non-Profit</p> <p>214 Programs, 22 Bachelor's in Business (view all)</p> <ul style="list-style-type: none"> <li>◦ B.S. in Business</li> <li>◦ B.A. in Communication</li> <li>◦ B.A. in Communication - Advertising and Public Relations</li> <li>◦ B.A. in Communication - Internet and Social Media</li> </ul> <p><b>Annual Tuition:</b> \$17,288  <b>Recommendation Rate:</b> 50% <a href="#">Learn More »</a></p>
	 <p><b>Request Information</b></p>	<p><b>Maryville University</b>  Non-Profit</p> <p>29 Programs, 9 Bachelor's in Business (view all)</p> <ul style="list-style-type: none"> <li>◦ BA in Communication</li> <li>◦ BA in International Studies</li> <li>◦ BA in Organizational Leadership</li> <li>◦ BS in Accounting</li> </ul> <p><b>Annual Tuition:</b> \$28,470  <b>Recommendation Rate:</b> 7% <a href="#">Learn More »</a></p>
<p><b>REFINE YOUR SEARCH</b></p> <p>Most Affordable (11)</p> <p>Non-Profit Schools (20)</p> <p>Military Benefits (7)</p> <p><b>Level</b> -</p> <p>Bachelor's (X)</p>	 <p><b>Request Information</b></p>	<p><b>Rasmussen College Online</b>  Low Tuition</p> <p>35 Programs, 7 Bachelor's in Business (view all)</p> <ul style="list-style-type: none"> <li>◦ Accounting Bachelor's Degree-Completion Program</li> <li>◦ Business Management Bachelor's Degree-Completion Program</li> <li>◦ Finance Bachelor's Degree-Completion Program</li> <li>◦ Healthcare Management Bachelor's Degree-Completion Program</li> </ul> <p><b>Annual Tuition:</b> \$10,935  <b>Recommendation Rate:</b> 49% <a href="#">Learn More »</a></p>
	 <p><b>Request Information</b></p>	<p><b>Western Governors University</b>  Low Tuition  Recommended  Non-Profit  Military Friendly</p> <p>49 Programs, 3 Bachelor's in Business (view all)</p> <ul style="list-style-type: none"> <li>◦ B.S. Business - Healthcare Management</li> <li>◦ B.S. Business - Human Resource Management</li> <li>◦ B.S. Data Management and Analytics</li> </ul> <p><b>Annual Tuition:</b> \$6,070  <b>Recommendation Rate:</b> 72% <a href="#">Learn More »</a></p>
<p>Most Affordable (11)</p> <p>Non-Profit Schools (20)</p> <p>Military Benefits (7)</p> <p><b>Level</b> -</p> <p>Bachelor's (X)</p>	 <p><b>Request Information</b></p>	<p><b>Bryan University Online</b>  Recommended</p> <p>13 Programs, 1 Bachelor's in Business (view all)</p> <ul style="list-style-type: none"> <li>◦ Bachelor of Science In Business Management</li> </ul> <p><b>Annual Tuition:</b> \$15,400 - \$15,447  <b>Recommendation Rate:</b> 67% <a href="#">Learn More »</a></p>
	 <p><b>Request Information</b></p>	<p><b>South College</b></p> <p>47 Programs, 6 Bachelor's in Business (view all)</p> <ul style="list-style-type: none"> <li>◦ Bachelor of Business Administration</li> <li>◦ Bachelor of Business Administration - Accounting</li> <li>◦ Bachelor of Business Administration - Health Care Administration</li> <li>◦ Bachelor of Business Administration - Human Resources Management</li> </ul> <p><b>Annual Tuition:</b> \$18,000 <a href="#">Learn More »</a></p>

<p>Most Affordable (11)</p> <p>Non-Profit Schools (20)</p> <p>Military Benefits (7)</p> <p><b>Level</b> -</p> <p>Bachelor's (X)</p>	 <p><b>New England College</b></p> <p>Request Information</p>	<p><b>New England College</b>  Non-Profit</p> <p>47 Programs, 14 Bachelor's in Business (view all)</p> <ul style="list-style-type: none"> <li>BA in Business Administration</li> <li>BA in Business Administration/Accounting</li> <li>BA in Business Administration/Business Analytics</li> <li>BA in Business Administration/Computer Information Systems</li> </ul> <p><b>Annual Tuition:</b> \$36,954 <b>Recommendation Rate:</b> 38%</p> <p><a href="#">Learn More »</a></p>
<p>Most Affordable (11)</p> <p>Non-Profit Schools (20)</p> <p>Military Benefits (7)</p> <p><b>Level</b> -</p> <p>Bachelor's (X)</p>	 <p><b>Colorado Christian University</b></p> <p>Request Information</p>	<p><b>Colorado Christian University</b>  Recommended  Non-Profit</p> <p>66 Programs, 3 Bachelor's in Business (view all)</p> <ul style="list-style-type: none"> <li>BS Business: Entrepreneurship</li> <li>BS Business: International Business</li> <li>BS in Nonprofit Management</li> </ul> <p><b>Annual Tuition:</b> \$30,370 <b>Recommendation Rate:</b> 60%</p> <p><a href="#">Learn More »</a></p>
<p>Non-Profit Schools (20)</p> <p>Military Benefits (7)</p> <p><b>Level</b> -</p> <p>Bachelor's (X)</p>	 <p><b>FULL SAIL UNIVERSITY</b></p> <p>Request Information</p>	<p><b>Full Sail University</b></p> <p>27 Programs, 4 Bachelor's in Business (view all)</p> <ul style="list-style-type: none"> <li>Bachelor of Science in Digital Marketing</li> <li>Bachelor of Science in Media Communications</li> <li>Bachelor of Science in Music Business</li> <li>Bachelor of Science in Sports Marketing and Media</li> </ul> <p><b>Annual Tuition:</b> \$23,694 <b>Recommendation Rate:</b> 43%</p> <p><a href="#">Learn More »</a></p>
<p>Non-Profit Schools (20)</p> <p>Military Benefits (7)</p> <p><b>Level</b> -</p> <p>Bachelor's (X)</p>	 <p><b>CIU</b> Columbia International University</p> <p>Request Information</p>	<p><b>Columbia International University</b>  Non-Profit</p> <p>5 Programs, 1 Bachelor's in Business (view all)</p> <ul style="list-style-type: none"> <li>Bachelor of Science in Business</li> </ul> <p><b>Annual Tuition:</b> \$22,390 <b>Recommendation Rate:</b> 100%</p> <p><a href="#">Learn More »</a></p>
<p>Non-Profit Schools (20)</p> <p>Military Benefits (7)</p> <p><b>Level</b> -</p> <p>Bachelor's (X)</p>	 <p><b>JWU ONLINE</b> COLLEGE OF ONLINE EDUCATION</p> <p>Request Information</p>	<p><b>Johnson &amp; Wales University-Online</b>  Low Tuition  Non-Profit</p> <p>26 Programs, 5 Bachelor's in Business (view all)</p> <ul style="list-style-type: none"> <li>BS - Business Studies</li> <li>BSBA - Entrepreneurship</li> <li>BSBA - Human Resource Management</li> <li>BSBA - International Business</li> </ul> <p><b>Annual Tuition:</b> \$13,365</p> <p><a href="#">Learn More »</a></p>
<p>Non-Profit Schools (20)</p> <p>Military Benefits (7)</p> <p><b>Level</b> -</p> <p>Bachelor's (X)</p>	 <p><b>Benedictine University</b></p> <p>Request Information</p>	<p><b>Benedictine University</b>  Non-Profit</p> <p>18 Programs, 3 Bachelor's in Business (view all)</p> <ul style="list-style-type: none"> <li>BAM - Human Resources Concentration</li> <li>BAM - Marketing Concentration</li> <li>BAM (Bachelors in Management)</li> </ul> <p><b>Annual Tuition:</b> \$33,900 <b>Recommendation Rate:</b> 33%</p> <p><a href="#">Learn More »</a></p>

<p>Most Affordable (11)</p> <p>Non-Profit Schools (20)</p> <p>Military Benefits (7)</p> <p><b>Level</b> -</p> <p>Bachelor's (X)</p>	 <p><b>Request Information</b></p>	<p><b>Post University Online</b></p> <p>47 Programs, 21 Bachelor's in Business (view all)</p> <ul style="list-style-type: none"> <li>◦ B.S. in Business Administration</li> <li>◦ B.S. in Business Administration / Accounting</li> <li>◦ B.S. in Marketing / International Marketing</li> <li>◦ B.S. in Accounting</li> </ul> <p><b>Annual Tuition:</b> Not Provided  <b>Recommendation Rate:</b> 36%</p> <p><a href="#">Learn More »</a></p>
	 <p><b>Request Information</b></p>	<p><b>Trident University International</b></p> <p>14 Programs, 3 Bachelor's in Business (view all)</p> <ul style="list-style-type: none"> <li>◦ Business Administration (BSBA)</li> <li>◦ Human Resources Management (BSHRM)</li> <li>◦ Leadership (BSL)</li> </ul> <p><b>Annual Tuition:</b> \$9,240  <b>Recommendation Rate:</b> 76%</p> <p><a href="#">Learn More »</a></p> <ul style="list-style-type: none"> <li> Low Tuition</li> <li> Recommended</li> <li> Military Friendly</li> </ul>

<p><b>REFINE YOUR SEARCH</b></p> <p>Most Affordable (11)</p> <p>Non-Profit Schools (20)</p> <p>Military Benefits (7)</p> <p><b>Level</b> -</p> <p>Bachelor's (X)</p>	 <p><b>Request Information</b></p>	<p><b>Independence University</b></p> <p>17 Programs, 6 Bachelor's in Business (view all)</p> <ul style="list-style-type: none"> <li>◦ Accounting - Forensic Accounting Emphasis (BS)</li> <li>◦ Accounting (BS)</li> <li>◦ Business Administration - Human Resources Emphasis (BS)</li> <li>◦ Business Administration - Technology Emphasis (BS)</li> </ul> <p><b>Annual Tuition:</b> \$16,968  <b>Recommendation Rate:</b> 53%</p> <p><a href="#">Learn More »</a></p> <ul style="list-style-type: none"> <li> Non-Profit</li> </ul>
	 <p><b>Request Information</b></p>	<p><b>Florida Tech</b></p> <p>27 Programs, 10 Bachelor's in Business (view all)</p> <ul style="list-style-type: none"> <li>◦ BA Accounting</li> <li>◦ BA Aviation Management</li> <li>◦ BA Business Administration - Accounting</li> <li>◦ BA Business Administration - CIS</li> </ul> <p><b>Annual Tuition:</b> \$16,128  <b>Recommendation Rate:</b> 67%</p> <p><a href="#">Learn More »</a></p> <ul style="list-style-type: none"> <li> Recommended</li> <li> Non-Profit</li> </ul>

<p>Non-Profit Schools (20)</p> <p>Military Benefits (7)</p> <p><b>Level</b> -</p> <p>Bachelor's (X)</p>	 <p><b>Request Information</b></p>	<p><b>California Baptist University</b></p> <p>38 Programs, 4 Bachelor's in Business (view all)</p> <ul style="list-style-type: none"> <li>◦ BA: Accounting</li> <li>◦ BA: Business Administration - Logistics and Operations</li> <li>◦ BA: Business Administration - Management</li> <li>◦ BA: Sport, Recreation and Fitness Management</li> </ul> <p><b>Annual Tuition:</b> \$32,256  <b>Recommendation Rate:</b> 80%</p> <p><a href="#">Learn More »</a></p> <ul style="list-style-type: none"> <li> Recommended</li> <li> Non-Profit</li> </ul>
	 <p><b>Request Information</b></p>	<p><b>ECPI University Online</b></p> <p>23 Programs, 2 Bachelor's in Business (view all)</p> <ul style="list-style-type: none"> <li>◦ Accounting - Bachelor's</li> <li>◦ Business Administration - Bachelor's</li> </ul> <p><b>Annual Tuition:</b> \$15,051  <b>Recommendation Rate:</b> 57%</p> <p><a href="#">Learn More »</a></p>

<b>REFINE YOUR SEARCH</b> Most Affordable (11) Non-Profit Schools (20) Military Benefits (7) <b>Level</b> - Bachelor's (X)	 <b>Grantham University</b> 43 Programs, 4 Bachelor's in Business (view all) <ul style="list-style-type: none"> <li>BBA (Bachelors of Business Administration)</li> <li>BBA in Financial Planning</li> <li>BBA in Human Resource Management</li> <li>BS in Accounting</li> </ul> <b>Annual Tuition:</b> \$6,540 <b>Recommendation Rate:</b> 48% <a href="#">Learn More »</a>	Low Tuition Military Friendly
	 <b>Penn Foster College</b> 29 Programs, 1 Bachelor's in Business (view all) <ul style="list-style-type: none"> <li>Business Management - Bachelors Degree</li> </ul> <b>Annual Tuition:</b> Not Provided <b>Recommendation Rate:</b> 64% <a href="#">Learn More »</a>	Recommended

Was this page helpful?

[Images above: SR Education Group college search results, downloaded October 7, 2019]

The search results are very similar for different degree program searches. Searching for a bachelor's degree in psychology produces many of the same schools as a search for an accounting degree, including Ashford University, Purdue University Global, Arizona State University, Grand Canyon University, and Walden University.

### Accredited Schools Offering Online Psychology Degrees

We have found 19 accredited schools that meet your criteria. They are a part of over 200 partner colleges with whom we have an advertising relationship. This allows us to provide accurate, up-to-date information about program offerings, accreditation, and tuition. Our Recommendation Rate is based on the largest database of independent reviews submitted by former students and is not impacted by the partnership.

Find an Online Degree:

<b>REFINE YOUR SEARCH</b> Most Affordable (7) Non-Profit Schools (14) Military Benefits (3) <b>Level</b> - Bachelor's (X)	 <b>Ashford University</b> 121 Programs, 4 Bachelor's in Psychology (view all) <ul style="list-style-type: none"> <li>BA/Applied Behavioral Science</li> <li>BA/Psychology</li> <li>BA/Child Development</li> <li>BA/Cognitive Studies</li> </ul> <b>Annual Tuition:</b> \$10,632 - \$13,400 <b>Recommendation Rate:</b> 67% <a href="#">Learn More »</a>	Low Tuition Recommended
	 <b>Purdue University Global</b> 144 Programs, 5 Bachelor's in Psychology (view all)	Low Tuition Non-Profit

[Image above: Ashford and Purdue Universities in the search results, downloaded October 1, 2019]

<p>Most Affordable (7)</p> <p>Non-Profit Schools (14)</p> <p>Military Benefits (3)</p> <p><b>Level</b> -</p> <p>Bachelor's (X)</p>	 <p><b>ASU Online</b> Arizona State University</p> <p>Request Information</p>	<p><b>Arizona State University</b></p> <p>181 Programs, 6 Bachelor's in Psychology (view all)</p> <ul style="list-style-type: none"> <li>BA in Psychology</li> <li>BS in Psychology</li> <li>BA in Psychology - Forensic Psychology</li> <li>BA in Women and Gender Studies</li> </ul> <p><b>Annual Tuition:</b> \$15,691 - \$27,372 <b>Recommendation Rate:</b> 71%</p> <p>Learn More »</p>	<p>Recommended</p> <p>Non-Profit</p> <p>Military Friendly</p>
	 <p><b>Central Christian College of Kansas</b></p> <p>Request Information</p>	<p><b>Central Christian College of Kansas</b></p> <p>14 Programs, 1 Bachelor's in Psychology (view all)</p> <ul style="list-style-type: none"> <li>BS in Psychology</li> </ul> <p><b>Annual Tuition:</b> \$17,240</p> <p>Learn More »</p>	<p>Non-Profit</p>

[Image above: ASU Online in the search results, downloaded October 1, 2019]

<p><b>REFINE YOUR SEARCH</b></p> <p>Most Affordable (7)</p> <p>Non-Profit Schools (14)</p> <p>Military Benefits (3)</p> <p><b>Level</b> -</p> <p>Bachelor's (X)</p>	 <p><b>GRAND CANYON UNIVERSITY</b></p> <p>Request Information</p>	<p><b>Grand Canyon University</b></p> <p>143 Programs, 6 Bachelor's in Psychology (view all)</p> <ul style="list-style-type: none"> <li>BS in Behavioral Health Science</li> <li>BS in Behavioral Health Science - Childhood and Adolescence Disorders</li> <li>BS in Behavioral Health Science - Trauma</li> <li>BS in Psychology</li> </ul> <p><b>Annual Tuition:</b> \$17,050 <b>Recommendation Rate:</b> 52%</p> <p>Learn More »</p>	<p>Non-Profit</p>
	 <p><b>WALDEN UNIVERSITY</b> <i>A higher degree. A higher purpose.</i></p> <p>Request Information</p>	<p><b>Walden University</b></p> <p>253 Programs, 12 Bachelor's in Psychology (view all)</p> <ul style="list-style-type: none"> <li>BS in Human Services - Psychology</li> <li>BS in Psychology - Applied Psychology</li> <li>BS in Psychology - Clinical Mental Health (MS AIM Track)</li> <li>BS in Psychology - General Psychology</li> </ul> <p><b>Annual Tuition:</b> Not Provided <b>Recommendation Rate:</b> 49%</p> <p>Learn More »</p>	

[Image above: GCU and Walden University in the search results, downloaded October 1, 2019]

**1. SR Education Group’s college searches are misleading because they are presented as unbiased and comprehensive**

The search results on Reach Network’s “SR Education Group” websites are misleading because they are presented in close proximity to the websites’ rankings, which it claims are based on independent methodology, as demonstrated by the images below:



## 2018 Best Master's and Doctoral Programs

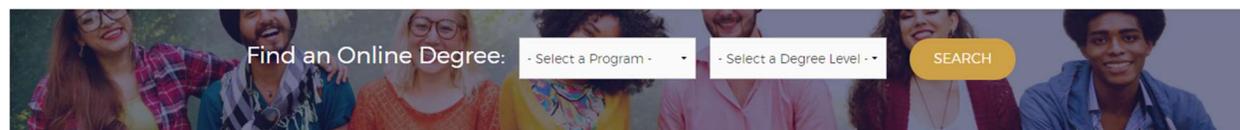
Check out our newly-updated **Best Master's Program rankings** and **Best Doctoral Program rankings**, which list the most highly-rated graduate schools. Created based on feedback from over 60,000 students and alumni, this year's rankings include 195 accredited colleges.

For 2018, in addition to a specific focus on four doctoral programs, we also expanded our coverage of **Best Online Master's Programs**, for those interested in more flexible degree programs.

Find an Online Degree:

	Accounting	Computer Science	Education
# 1	Case Western Reserve University	# 1 Boston University	# 1 Indiana State University
# 2	Arizona State University	# 2 Massachusetts Institute of Technology	# 2 University of South Carolina-Columbia
# 3	University of Michigan - Ann Arbor	# 3 University of Massachusetts - Amherst	# 3 SUNY at Fredonia

[Image above: SR Education Group ranking and search bar, downloaded October 3, 2019]



## 2020 Best Online Colleges & Degrees



SR Education Group's 2019-2020 best online colleges are the first rankings of their kind to use alumni salary data and manually researched tuition rates to provide a list of the schools offering the best value to students. We researched 1,943 schools and have published over 250 program rankings, all using subject- and level-specific data. These schools offer fully online degrees for as low as \$7,000 per year, and their alumni have a median mid-career salary of \$80,000-\$121,000.

[Rankings by Degree Level](#) - [Rankings by Subject](#)

Read more about our ranked schools below, view our methodology, or learn more about SR Education Group.

Find an Online Degree:

[Image above: SR Education Group ranking and search bar, downloaded October 3, 2019]

By publishing its search tool in close proximity to its school rankings, SR Education Group gives the impression that at least some quality control standards are applied to school searches. However, search results are vastly different from school rankings. For example, *guidetoonlineschools.com* lists “Best Online Colleges & Degrees.” None of these schools appear in school search results on the website.

Ⓞ All 2019-2020 tuition numbers were manually collected and verified

Rank	School	Undergrad Tuition Ⓞ	Undergrad Salary Ⓞ	Grad Tuition Ⓞ	Grad Salary Ⓞ
#1	The George Washington University	\$18,450	\$103k	\$17,640	\$121k
#2	University of Virginia	\$13,260	\$103k	\$8,115	\$113k
#3	University of Massachusetts-Lowell	\$33,004	\$100k	\$21,975	\$117k
#4	Florida Institute of Technology	\$15,428	\$96k	\$12,821	\$115k
#5	Golden Gate University	\$20,460	\$93k	\$14,850	\$117k
#6	Oregon State University	\$13,905	\$93k	\$12,880	\$109k
#7	Rutgers University	\$19,200	\$99k	\$13,248	\$103k
#8	DePaul University	\$23,040	\$89k	\$15,065	\$112k
#9	University of Minnesota Digital Campus	\$13,364	\$92k	\$9,243	\$106k
#10	Drexel University	\$38,475	\$98k	\$29,969	\$104k
#11	Texas Tech University	\$9,090	\$92k	\$5,295	\$103k
#12	Washington State University	\$11,550	\$92k	\$8,925	\$103k

[Image above: “Best Online Colleges & Degrees” ranking, downloaded October 3, 2019]

Other SR Education Group websites, like *onlineu.org*, also misleadingly feature rankings next to search bars. *Onlineu.org* lists “2020 Most Affordable Online Colleges.”

2020 Most Affordable Online Colleges

Each year, we publish our Most Affordable Online College Rankings, which represent the most affordable online degrees in the country across a variety of popular subjects. Every degree is from an accredited school, and annual tuitions start below \$4,000.

Rank	School	Undergrad Tuition Ⓞ	Grad Tuition Ⓞ
# 1	Tennessee State University	\$4,200	\$3,842
# 2	Georgia Southwestern State University	\$5,970	\$3,855
# 3	Aspen University	\$4,500	\$5,850
# 4	University of Arkansas	\$6,159	\$4,558
# 5	Fort Hays State University	\$6,560	\$4,316
# 6	Albany State University	\$5,487	\$5,400
# 7	Minot State University	\$6,087	\$5,030
# 8	University of the Cumberlands	\$6,368	\$4,883
# 9	Valdosta State University	\$6,060	\$5,274
# 10	Union College - KY	\$6,750	\$5,100

[Image above: “2020 Most Affordable Online Colleges” ranking, downloaded October 1, 2019]

The rankings description includes information about its methodology. It claims that each school listed “has an undergraduate tuition rate under \$9,000 and a graduate tuition rate under \$7,000 per year.” Schools appear to be listed in ascending order of tuition. A quick review of the Department of Education’s College Scorecard demonstrates that these rankings are inaccurate. For example, Tennessee State University is listed as having an annual tuition of \$4,200 on these rankings, but its average annual cost on the College Scorecard is listed at \$11,083.<sup>55</sup> Similarly,

<sup>55</sup> *Tennessee State University*, COLLEGE SCORECARD, <https://collegescorecard.ed.gov/school/?221838-Tennessee-State-University> (last visited Jan. 27, 2020).

Georgia Southwestern State University is listed as having “Undergrad Tuition” of \$5,970, but College Scorecard lists its average annual cost at \$12,746.<sup>56</sup>

Find an Online Degree: Select a Program Select a Level Search

## 2020 Most Affordable Online Colleges & Degrees

SR Education group researched 1,943 institutions in order to highlight the 25 most affordable online schools. Each school has an undergraduate tuition rate under \$9,000 and a graduate tuition rate under \$7,000 per year. Tennessee State University, ranked #1, offers six online bachelor's degrees and six master's degrees, with an annual undergraduate and graduate tuition rate of \$4,200 and \$3,842 respectively.

Ranking Details - Rankings By Degree Level - Rankings By Subject

We also rank the most affordable degrees in 82 subjects, such as healthcare, social work, and business, and by degree level including associate, bachelor's, master's, and doctoral degrees. Read our methodology or learn more about SR Education Group.

Find an Online Degree: -Select a Program- -Select a Degree Level- Search

[Image above: “2020 Most Affordable Online Colleges” methodology description, downloaded October 1, 2019]

Searches on *onlineu.org* yield the same colleges that appear in other SR Education Group college searches. In addition, none of these colleges appear in the “Most Affordable Online Colleges” ranking. Note that the tuition for many of these schools is higher than the \$9,000 cap listed in the “most affordable” methodology.

## Accredited Colleges Offering Online Degrees in Accounting

We have found 25 accredited schools that meet your criteria. They are a part of over 200 partner colleges with whom we have an advertising relationship. This allows us to provide accurate, up-to-date information about program offerings, accreditation, and tuition. Our Recommendation Rate is based on the largest database of independent reviews submitted by former students and is not impacted by the partnership.

Find an Online Degree: Accounting Bachelor's Degree Search

REFINE YOUR SEARCH

- Most Affordable (6)
- Military-Friendly (5)
- Non-Profit (18)
- LEVEL
- Bachelor's (X)

**Ashford University**  
121 Programs, 2 Bachelor's in Accounting (view all)

- BA/Accounting
- BA/Consumer and Family Financial Services

Request Information

Annual Tuition: \$10,632 - \$13,400  
Recommendation Rate: 68% (639 reviews)

Learn More »

**Purdue University Global**  
144 Programs, 6 Bachelor's in Accounting (view all)

- BS in Accounting
- BSA - Auditing/Forensic Accountancy
- BSA - Managerial Accountancy

Request Information

Recommended  
Low Tuition

Low Tuition  
Non-Profit

<sup>56</sup> Georgia Southwestern State University, COLLEGE SCORECARD, <https://collegescorecard.ed.gov/school/?139764-Georgia-Southwestern-State-University> (last visited Jan. 27, 2020).

 <a href="#">Request Information</a>	<p><b>Arizona State University</b>  181 Programs, 1 Bachelor's in Accounting (view all)</p> <ul style="list-style-type: none"> <li>◦ BA in Business - Corporate Accounting</li> </ul> <p><b>Annual Tuition:</b> \$15,691 - \$27,372  <b>Recommendation Rate:</b> 71% (80 reviews)</p>	<ul style="list-style-type: none"> <li>👍 Recommended</li> <li>🛡️ Military Friendly</li> <li>🏠 Non-Profit</li> </ul> <p><a href="#">Learn More »</a></p>
 <a href="#">Request Information</a>	<p><b>Indiana Wesleyan University Online - Adult Education</b>  50 Programs, 1 Bachelor's in Accounting (view all)</p> <ul style="list-style-type: none"> <li>◦ B.S. Accounting</li> </ul> <p><b>Annual Tuition:</b> \$25,980  <b>Recommendation Rate:</b> 29% (7 reviews)</p>	<ul style="list-style-type: none"> <li>🏠 Non-Profit</li> </ul> <p><a href="#">Learn More »</a></p>
 <a href="#">Request Information</a>	<p><b>Grand Canyon University</b>  143 Programs, 1 Bachelor's in Accounting (view all)</p> <ul style="list-style-type: none"> <li>◦ BS in Accounting</li> </ul> <p><b>Annual Tuition:</b> \$17,050  <b>Recommendation Rate:</b> 54% (410 reviews)</p>	<ul style="list-style-type: none"> <li>🏠 Non-Profit</li> </ul>
 <a href="#">Request Information</a>	<p><b>Walden University</b>  253 Programs, 1 Bachelor's in Accounting (view all)</p> <ul style="list-style-type: none"> <li>◦ BS in Business Administration - Accounting</li> </ul> <p><b>Annual Tuition:</b> Not Provided  <b>Recommendation Rate:</b> 50% (489 reviews)</p>	<p><a href="#">Learn More »</a></p>
 <a href="#">Request Information</a>	<p><b>Liberty University</b>  416 Programs, 2 Bachelor's in Accounting (view all)</p> <ul style="list-style-type: none"> <li>◦ BS: Accounting</li> <li>◦ BS: Information Systems: Accounting Information Systems</li> </ul> <p><b>Annual Tuition:</b> \$11,700  <b>Recommendation Rate:</b> 60% (245 reviews)</p>	<ul style="list-style-type: none"> <li>👍 Recommended</li> <li>💰 Low Tuition</li> <li>🛡️ Military Friendly</li> <li>🏠 Non-Profit</li> </ul> <p><a href="#">Learn More »</a></p>
 <a href="#">Request Information</a>	<p><b>Southern New Hampshire University Online</b>  137 Programs, 4 Bachelor's in Accounting (view all)</p> <ul style="list-style-type: none"> <li>◦ BS Accounting</li> <li>◦ BS Accounting - Forensic Accounting and Fraud</li> </ul>	<ul style="list-style-type: none"> <li>👍 Recommended</li> <li>💰 Low Tuition</li> <li>🏠 Non-Profit</li> </ul>
 <a href="#">Request Information</a>	<p><b>Saint Leo University Online</b>  78 Programs, 2 Bachelor's in Accounting (view all)</p> <ul style="list-style-type: none"> <li>◦ B.A. in Accounting</li> <li>◦ B.A. in Business Administration - Accounting Specialization</li> </ul> <p><b>Annual Tuition:</b> \$22,220  <b>Recommendation Rate:</b> 68% (82 reviews)</p>	<ul style="list-style-type: none"> <li>👍 Recommended</li> <li>🏠 Non-Profit</li> </ul> <p><a href="#">Learn More »</a></p>
 <a href="#">Request Information</a>	<p><b>Colorado State University-Global Campus</b>  38 Programs, 1 Bachelor's in Accounting (view all)</p> <ul style="list-style-type: none"> <li>◦ BS - Accounting</li> </ul> <p><b>Annual Tuition:</b> \$9,000  <b>Recommendation Rate:</b> 64% (58 reviews)</p>	<ul style="list-style-type: none"> <li>👍 Recommended</li> <li>💰 Low Tuition</li> <li>🛡️ Military Friendly</li> <li>🏠 Non-Profit</li> </ul> <p><a href="#">Learn More »</a></p>
 <a href="#">Request Information</a>	<p><b>Brenau University</b>  53 Programs, 1 Bachelor's in Accounting (view all)</p> <ul style="list-style-type: none"> <li>◦ Bachelor of Business Administration in Accounting</li> </ul> <p><b>Annual Tuition:</b> \$28,510</p>	<ul style="list-style-type: none"> <li>🏠 Non-Profit</li> </ul>



**Regent University Online**

214 Programs, 2 Bachelor's in Accounting (view all)

- B.S. in Accounting
- B.S. in Business - Accounting

**Annual Tuition:** \$17,288  
**Recommendation Rate:** 54% (13 reviews)

[Request Information](#)

Non-Profit

[Learn More »](#)



**Maryville University**

29 Programs, 1 Bachelor's in Accounting (view all)

- BS in Accounting

**Annual Tuition:** \$28,470  
**Recommendation Rate:** 31% (16 reviews)

[Request Information](#)

Non-Profit

[Learn More »](#)



**Rasmussen College Online**

35 Programs, 1 Bachelor's in Accounting (view all)

- Accounting Bachelor's Degree-Completion Program

**Annual Tuition:** \$10,935  
**Recommendation Rate:** 49% (75 reviews)

[Request Information](#)

Low Tuition

[Learn More »](#)



**University of Alabama at Birmingham**

8 Programs, 1 Bachelor's in Accounting (view all)

- BS in Accounting

**Annual Tuition:** \$19,032  
**Recommendation Rate:** 100% (1 review)

[Request Information](#)

Military Friendly  
 Non-Profit

[Learn More »](#)



**South College**

47 Programs, 1 Bachelor's in Accounting (view all)

- Bachelor of Business Administration - Accounting

**Annual Tuition:** \$18,000  
**Recommendation Rate:** Add Review

[Request Information](#)

[Learn More »](#)



**New England College**

47 Programs, 2 Bachelor's in Accounting (view all)

- BA in Business Administration/Accounting
- BS in Accounting

**Annual Tuition:** \$36,954  
**Recommendation Rate:** 29% (7 reviews)

[Request Information](#)

Non-Profit

[Learn More »](#)



**Colorado Christian University**

66 Programs, 1 Bachelor's in Accounting (view all)

- BS Accountancy

**Annual Tuition:** \$30,370  
**Recommendation Rate:** 60% (10 reviews)

[Request Information](#)

Recommended  
 Non-Profit

[Learn More »](#)



**Columbia International University**

5 Programs, 1 Bachelor's in Accounting (view all)

- Bachelor of Science in Business

**Annual Tuition:** \$22,390  
**Recommendation Rate:** Add Review

[Request Information](#)

Non-Profit

[Learn More »](#)



**Post University Online**

47 Programs, 2 Bachelor's in Accounting (view all)

- B.S. in Accounting
- B.S. in Business Administration / Accounting

**Annual Tuition:** Not Provided  
**Recommendation Rate:** 35% (83 reviews)

[Request Information](#)

 <a href="#">Request Information</a>	<p><b>Independence University</b>            17 Programs, 2 Bachelor's in Accounting (view all)</p> <ul style="list-style-type: none"> <li>Accounting (BS)</li> <li>Accounting - Forensic Accounting Emphasis (BS)</li> </ul> <p>Annual Tuition: \$16,968            Recommendation Rate: 59% (97 reviews)</p> <p><a href="#">Learn More »</a></p>	 Non-Profit
 <a href="#">Request Information</a>	<p><b>Florida Tech</b>            27 Programs, 2 Bachelor's in Accounting (view all)</p> <ul style="list-style-type: none"> <li>BA Accounting</li> <li>BA Business Administration - Accounting</li> </ul> <p>Annual Tuition: \$16,128            Recommendation Rate: 67% (76 reviews)</p> <p><a href="#">Learn More »</a></p>	 Recommended  Non-Profit
 <a href="#">Request Information</a>	<p><b>California Baptist University</b>            38 Programs, 1 Bachelor's in Accounting (view all)</p> <ul style="list-style-type: none"> <li>BA: Accounting</li> </ul> <p>Annual Tuition: \$32,256            Recommendation Rate: 75% (4 reviews)</p>	 Non-Profit
 <a href="#">Request Information</a>	<p><b>ECPI University Online</b>            23 Programs, 1 Bachelor's in Accounting (view all)</p> <ul style="list-style-type: none"> <li>Accounting - Bachelor's</li> </ul> <p>Annual Tuition: \$15,051            Recommendation Rate: 71% (7 reviews)</p> <p><a href="#">Learn More »</a></p>	 Recommended
 <a href="#">Request Information</a>	<p><b>Grantham University</b>            43 Programs, 1 Bachelor's in Accounting (view all)</p> <ul style="list-style-type: none"> <li>BS in Accounting</li> </ul> <p>Annual Tuition: \$6,540            Recommendation Rate: 52% (71 reviews)</p> <p><a href="#">Learn More »</a></p>	 Low Tuition  Military Friendly

This website offers school details to prospective students as an informational resource. The appearance of a school listing on this website should not be interpreted as an endorsement by the school of this site.

[Images above: SR Education Group search results on [onlineu.org](http://onlineu.org), downloaded October 1, 2019]

*Graduateprograms.com*, another SR Education Group website, published a list of “2018 Best Master’s and Doctoral Programs.”

### Methodology

Our goal in presenting this school data is to create a standardized and trustworthy method to assess institutions based on reliable statistics. In order for a school to be eligible to be featured on a 2018 Top Programs List, at least five students from that particular degree program must have submitted feedback on their institution. Graduate Programs only considers regionally or nationally accredited, non-profit institutions for our rankings. Aggregated student rating values were multiplied by 20 to create a Student Score out of 100; in the event of a tie, schools were awarded the same rank value.

Together with our internal recommend rate data, which is calculated based on tens of thousands of student reviews submitted to our site, the data used in the school listings were gathered in 2016-2017 from the National Center for Education Statistics (NCES). This site is the primary governmental entity for gathering and presenting data related to education. NCES data is updated annually. However, in many cases the most recently available data will not be for the current academic year. Additionally, tuition rates may vary by program, so prospective students should contact a representative from their institution of choice for more details.

[Image above: “2018 Best Master’s and Doctoral Programs” methodology, downloaded October 1, 2019]

Note how the methodology paragraph states that “Graduate Programs only considers regionally or nationally accredited, *non-profit* institutions for our rankings (emphasis added).” It also cites data obtained from the National Center for Education Statistics (“NCES”). This is deceptive because the search results yield many for-profit institutions, with for-profit Ashford University usually at the top. Additionally, the schools listed likely have an advertising relationship with SR Education Group. It is not clear if search listings are based on NCES data at all because “rankings” do not correspond with the search results. “Rankings” only include non-profit institutions, but for-profit institutions are always at the top of the search results.

Find an Online Degree: Accounting Master's Degree Search

We have found 30 accredited schools that meet your criteria. They are a part of over 200 partner colleges with whom we have an advertising relationship. This allows us to provide accurate, up-to-date information about program offerings, accreditation, and tuition. Our Recommendation Rate is based on the largest database of independent reviews submitted by former students and is not impacted by the partnership.

**Refine Your Search**

Most Affordable ( 13 )

Military-Friendly ( 3 )

Non-Profit ( 27 )

 <p><b>Ashford University</b></p> <p>47 Programs, 2 Master's in Accounting (view all)</p> <p>MA/Accountancy - Accounting Specialization MA/Accountancy - Audit Specialization</p> <p>Annual Tuition: \$10,386 - \$15,192 Recommendation Rate: 89% (85 reviews) Accreditation: <u>WASC WSCUC</u></p> <p>Request Information</p>	<p>Recommended</p> <p>Low Tuition</p>
 <p><b>Purdue University Global</b></p> <p>63 Programs, 5 Master's in Accounting (view all)</p> <p>MS in Accounting MS in Accounting - Audit MS in Accounting - Government MS in Accounting - Finance Specialization</p> <p>Request Information</p>	<p>Low Tuition</p> <p>Non-Profit</p>
 <p><b>Grand Canyon University</b></p> <p>104 Programs, 1 Master's in Accounting (view all)</p> <p>MBA - Accounting</p> <p>Annual Tuition: \$10,555 Recommendation Rate: 93% (475 reviews) Accreditation: <u>HLC</u></p> <p>Request Information</p>	<p>Recommended</p> <p>Non-Profit</p>
 <p><b>Walden University</b></p> <p>214 Programs, 1 Master's in Accounting (view all)</p> <p>Master of Business Administration (MBA) - Accounting</p> <p>Annual Tuition: Not Provided Recommendation Rate: 94% (744 reviews) Accreditation: <u>HLC</u></p> <p>Request Information</p>	<p>Recommended</p>
 <p><b>Liberty University</b></p> <p>297 Programs, 9 Master's in Accounting (view all)</p> <p>MS: Accounting</p> <p>Request Information</p>	<p>Recommended</p> <p>Low Tuition</p> <p>Military Friendly</p>

 **Southern New Hampshire University Online**  
 62 Programs, 6 Master's in Accounting (view all)

[Request Information](#)

MS in Accounting  
 MS in Accounting - Auditing  
 MS in Accounting - Management Accounting  
 MS in Accounting and Finance

**Recommendation Rate:** 98% (184 reviews)  
**Accreditation:** [NECHE](#)

[Learn More »](#)

-  Recommended
-  Low Tuition
-  Non-Profit

 **Saint Leo University Online**  
 42 Programs, 2 Master's in Accounting (view all)

[Request Information](#)

Master of Accounting  
 M.B.A. - Accounting

**Annual Tuition:** \$9,990  
**Recommendation Rate:** 86% (7 reviews)  
**Accreditation:** [SACS COC](#)

[Learn More »](#)

-  Recommended
-  Non-Profit

 **Colorado State University-Global Campus**  
 12 Programs, 1 Master's in Accounting (view all)

[Request Information](#)

Master - Professional Accounting

**Annual Tuition:** \$9,000  
**Recommendation Rate:** 100% (4 reviews)  
**Accreditation:** [HLC](#)

[Learn More »](#)

-  Low Tuition
-  Military Friendly
-  Non-Profit

 **University of the Southwest**  
 22 Programs, 1 Master's in Accounting (view all)

[Request Information](#)

MBA - Accounting

**Annual Tuition:** \$14,376  
**Recommendation Rate:** 100% (11 reviews)  
**Accreditation:** [HLC](#)

[Learn More »](#)

-  Recommended
-  Non-Profit

 **Brenau University**  
 29 Programs, 2 Master's in Accounting (view all)

[Request Information](#)

Master of Business Administration in Managerial Accounting  
 Master of Business Administration in Public Accounting

**Annual Tuition:** \$12,730  
**Recommendation Rate:** 97% (34 reviews)  
**Accreditation:** [SACS COC](#)

[Learn More »](#)

-  Recommended
-  Non-Profit

 **Regent University Online**  
 156 Programs, 1 Master's in Accounting (view all)

[Request Information](#)

MBA - Accounting

**Annual Tuition:** \$13,326  
**Recommendation Rate:** 96% (104 reviews)  
**Accreditation:** [SACS COC](#)

[Learn More »](#)

-  Recommended
-  Non-Profit

 <a href="#">Request Information</a>	<p><b>Maryville University</b>  4 Programs, 1 Master's in Accounting (view all)</p> <p>MS in Accounting</p> <p><b>Annual Tuition:</b> \$15,646  <b>Recommendation Rate:</b> 89% (55 reviews)  <b>Accreditation:</b> <a href="#">HLC</a></p>	<p> Recommended   Non-Profit</p> <p><a href="#">Learn More »</a></p>
 <a href="#">Request Information</a>	<p><b>South College</b>  13 Programs, 1 Master's in Accounting (view all)</p> <p>MBA - Accounting</p> <p><b>Annual Tuition:</b> \$24,112  <b>Recommendation Rate:</b> 96% (23 reviews)  <b>Accreditation:</b> <a href="#">SACS COC</a></p>	<p> Recommended</p> <p><a href="#">Learn More »</a></p>
 <a href="#">Request Information</a>	<p><b>Colorado Christian University</b>  27 Programs, 2 Master's in Accounting (view all)</p> <p>MS in Accounting</p>	<p> Recommended   Non-Profit</p>
 <a href="#">Request Information</a>	<p><b>Benedictine University</b>  11 Programs, 1 Master's in Accounting (view all)</p> <p>Master of Science in Accountancy</p> <p><b>Annual Tuition:</b> \$17,526  <b>Recommendation Rate:</b> 93% (46 reviews)  <b>Accreditation:</b> <a href="#">HLC</a></p>	<p> Recommended   Non-Profit</p> <p><a href="#">Learn More »</a></p>
 <a href="#">Request Information</a>	<p><b>Saint Mary's University of Minnesota</b>  16 Programs, 1 Master's in Accounting (view all)</p> <p>Master of Science in Accounting</p> <p><b>Annual Tuition:</b> \$8,550  <b>Recommendation Rate:</b> 91% (35 reviews)  <b>Accreditation:</b> <a href="#">HLC</a></p>	<p> Recommended   Non-Profit</p> <p><a href="#">Learn More »</a></p>
 <a href="#">Request Information</a>	<p><b>University of Southern Indiana</b>  6 Programs, 1 Master's in Accounting (view all)</p> <p>Master of Business Administration in Accounting</p>	<p> Recommended   Non-Profit</p>
 <a href="#">Request Information</a>	<p><b>University of South Carolina-Aiken</b>  4 Programs, 1 Master's in Accounting (view all)</p> <p>MBA - Accounting</p> <p><b>Annual Tuition:</b> \$28,706  <b>Recommendation Rate:</b> 100% (4 reviews)  <b>Accreditation:</b> <a href="#">SACS COC</a></p>	<p> Non-Profit</p> <p><a href="#">Learn More »</a></p>
 <a href="#">Request Information</a>	<p><b>The University of Scranton</b>  17 Programs, 2 Master's in Accounting (view all)</p> <p>Masters of Accountancy  MBA - Accounting</p> <p><b>Annual Tuition:</b> \$11,630  <b>Recommendation Rate:</b> 90% (29 reviews)  <b>Accreditation:</b> <a href="#">MSCHE</a></p>	<p> Recommended   Non-Profit</p> <p><a href="#">Learn More »</a></p>
 <a href="#">Request Information</a>	<p><b>Seton Hall University</b>  10 Programs, 3 Master's in Accounting (view all)</p> <p>MS in Accounting  MS in Professional Accounting</p>	<p> Recommended   Non-Profit</p>

 <a href="#">Request Information</a>	<p><b>Texas A &amp; M University-Corpus Christi</b> 5 Programs, 1 Master's in Accounting (view all)</p> <p>MBA - Accounting</p> <p><b>Annual Tuition:</b> \$15,447 <b>Recommendation Rate:</b> 97% (34 reviews) <b>Accreditation:</b> SACSCOC</p>	<p>  Recommended   Non-Profit         </p> <p><a href="#">Learn More »</a></p>
 <a href="#">Request Information</a>	<p><b>Villanova University Online Graduate Programs</b> 4 Programs, 2 Master's in Accounting (view all)</p> <p>LLM in Taxation (JD required) Master of Taxation</p> <p><b>Annual Tuition:</b> \$18,473 <b>Recommendation Rate:</b> Add Review <b>Accreditation:</b> MSCHE</p>	<p>  Non-Profit         </p> <p><a href="#">Learn More »</a></p>
	<p><b>Johns Hopkins University</b> 34 Programs, 1 Master's in Accounting (view all)</p>	<p>  Recommended   Non-Profit         </p>
 <a href="#">Request Information</a>	<p><b>Southern Oregon University</b> 4 Programs, 1 Master's in Accounting (view all)</p> <p>Master of Business Administration - Accounting</p> <p><b>Annual Tuition:</b> \$20,832 <b>Recommendation Rate:</b> 95% (19 reviews) <b>Accreditation:</b> NWCCU</p>	<p>  Recommended   Non-Profit         </p> <p><a href="#">Learn More »</a></p>
 <a href="#">Request Information</a>	<p><b>Norwich University</b> 4 Programs, 1 Master's in Accounting (view all)</p> <p>Master of Business Administration</p> <p><b>Annual Tuition:</b> \$19,578 <b>Recommendation Rate:</b> 92% (13 reviews) <b>Accreditation:</b> NECHE</p>	<p>  Recommended   Military Friendly   Non-Profit         </p> <p><a href="#">Learn More »</a></p>
 <a href="#">Request Information</a>	<p><b>Utica College</b> 28 Programs, 2 Master's in Accounting (view all)</p> <p>MS in Accounting MBA - Finance and Accounting</p>	<p>  Recommended   Non-Profit         </p>
 <a href="#">Request Information</a>	<p><b>Ohio University-Main Campus</b> 2 Programs, 1 Master's in Accounting (view all)</p> <p>Master of Accountancy</p> <p><b>Annual Tuition:</b> \$17,707 <b>Recommendation Rate:</b> 96% (71 reviews) <b>Accreditation:</b> HLC</p>	<p>  Recommended   Non-Profit         </p> <p><a href="#">Learn More »</a></p>
 <a href="#">Request Information</a>	<p><b>University of North Dakota</b> 1 Programs, 1 Master's in Accounting (view all)</p> <p>Master of Accountancy</p> <p><b>Annual Tuition:</b> \$22,027 <b>Recommendation Rate:</b> 98% (48 reviews) <b>Accreditation:</b> HLC</p>	<p>  Recommended   Non-Profit         </p> <p><a href="#">Learn More »</a></p>
 <a href="#">Request Information</a>	<p><b>St. John's University</b> 10 Programs, 1 Master's in Accounting (view all)</p> <p>Master of Business Administration: Taxation</p> <p><b>Annual Tuition:</b> \$18,175</p>	<p>  Recommended   Non-Profit         </p>

Recommendation Rate: 92% (60 reviews)  
Accreditation: [MSCHE](#)

[Learn More »](#)

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**California Baptist University**  
15 Programs, 1 Master's in Accounting (view all)

MS: Accounting

Annual Tuition: \$13,997  
Recommendation Rate: 95% (63 reviews)  
Accreditation: [WASC WSCUC](#)

[Learn More »](#)

Recommended

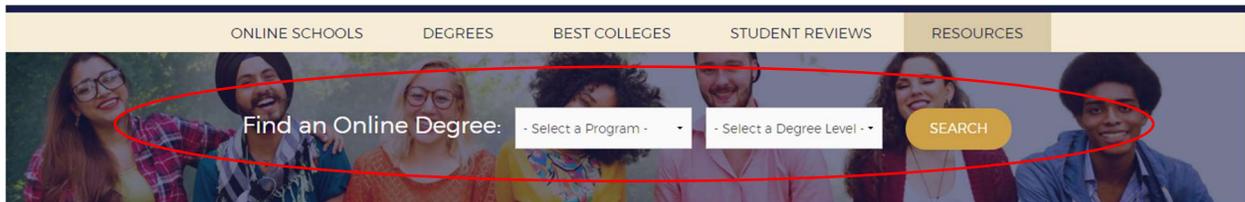
Non-Profit

[Request Information](#)

This website offers school details to prospective students as an informational resource. The appearance of a school listing on this website should not be interpreted as an endorsement by the school of this site.

[Images above: SR Education Group search results on [graduateprograms.com](#), downloaded October 1, 2019]

SR Education Group also lists the search bar frequently on pages that provide advice to students. The search bar appears *six times* on a [guidetoonlineschools.com](#) page that provides financial aid and student loan advice:



## Guide to Financial Aid for Online Students



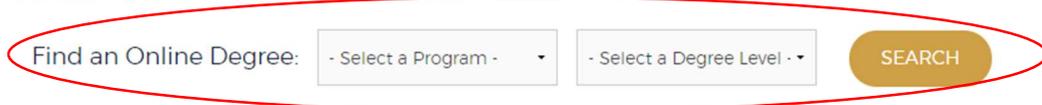
Receiving a bachelor's degree can increase your overall net worth by \$800,000. With statistics like these, it becomes clear that money you put into your education will pay off exponentially.

Education is the fastest route to a successful, reasonably paying career. Unfortunately, many prospective students are discouraged from earning a degree due to the financial sacrifices that have to be made. Today, the average cost of college exceeds \$7,000 per year. That is a huge chunk of change for any one person to be responsible for paying.

What everyone should know, however, is that paying for school is not an impossible feat. Financing an education is actually something just about everyone is able to do with the right planning and foresight. Luckily, there are billions of dollars given

[Image above: search bar on financial aid advice page, downloaded October 4, 2019]

What everyone should know, however, is that paying for school is not an impossible feat. Financing an education is actually something just about everyone is able to do with the right planning and foresight. Luckily, there are billions of dollars given each year in financial aid. One simply needs to find them.

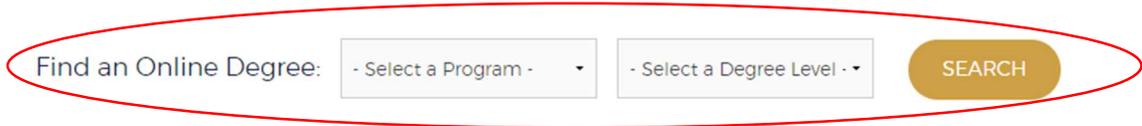


- [How to Apply for Financial Aid](#)
- [Types of Financial Aid](#)
- [What is the FAFSA and Why Do I Need It?](#)
- [Are There Ways to Qualify for Financial Aid Without the FAFSA?](#)

- [The Ins and Outs of Student Loans](#)
- [Tax Benefits for Students](#)
- [Resources for Financial Aid Assistance](#)

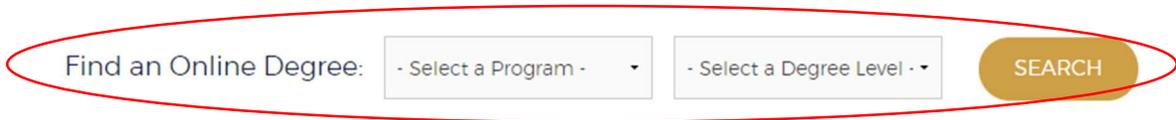
[Image above: search bar on financial aid advice page, downloaded October 4, 2019]

- Remember that the money you borrow *must be repaid*. Do not use it frivolously, and don't take out more than you need.



## Types of Financial Aid

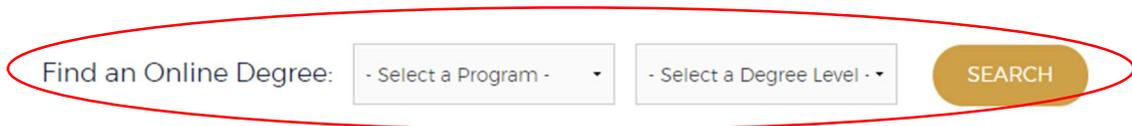
[Image above: search bar on financial aid advice page, downloaded October 4, 2019]



## What Is the FAFSA and Why Do I Need It?

[Image above: search bar on financial aid advice page, downloaded October 4, 2019]

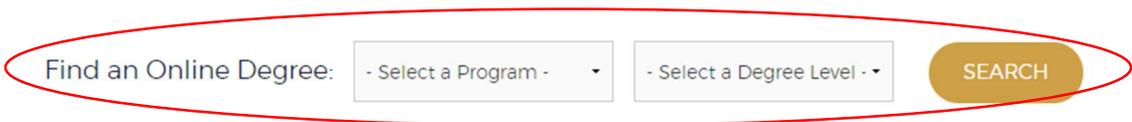
would qualify for.



## The Ins and Outs of Student Loans

[Image above: search bar on financial aid advice page, downloaded October 4, 2019]

harder it will be to come to a mutually beneficial solution



## Tax Benefits for Students

[Image above: search bar on financial aid advice page, downloaded October 4, 2019]

The frequency of the search bar, especially in student advice articles, demonstrates that these websites are a blatant attempt to promote schools instead of a legitimate effort to educate students.

As mentioned previously, SR Education Group is presented as a resource for students, providing “unbiased” and “comprehensive” information.<sup>57</sup> Rankings are displayed that showcase many high quality schools, but searches yield many low quality schools that, judging by the advertising arrangements SR Education Group touts, apparently paid to appear in the search results. This includes Ashford University, Trident University, Grand Canyon University, and Grantham University. Veterans Education Success has published multiple reports that show

<sup>57</sup> SR Education Group homepage, SR EDUCATION GROUP, <https://www.sreducationgroup.org/> (last visited Oct. 23, 2019).

Ashford engages in a variety of misleading, illegal practices and produces bad outcomes for students.<sup>58</sup> In 2017, the California Attorney General sued Ashford and its parent company, Zovio (which had changed its name from Bridgepoint), for engaging in unlawful business practices.<sup>59</sup> Zovio and Ashford have also been subject to investigations conducted by the U.S. Department of Justice and the Massachusetts, North Carolina, and New York attorneys general.<sup>60</sup> Despite this, SR Education Group lists Ashford as a “Recommended” school:



[Image above: Ashford University in the search results, downloaded October 18, 2019]

A reasonable consumer would assume that SR Education Group is relying on “unbiased” and “comprehensive” information in its school searches, and that the same methodology applied to rankings (or at least some form of quality control) is also applied to searches. SR Education Group even seems to claim in its disclosure that its search results are unaffected by its advertising relationship with partner schools:

We have found 33 accredited schools that meet your criteria. They are a part of over 200 partner colleges with whom we have an advertising relationship. This allows us to provide accurate, up-to-date information about program offerings, accreditation, and tuition. Our Recommendation Rate is based on the largest database of independent reviews submitted by former students and is not impacted by the partnership.

[Image above: SR Education Group search disclosure: downloaded October 18, 2019]

In reality, the search results are inconsistent with the rankings and their methodology, and likely based on SR Education Group’s advertising relationship with listed schools.

<sup>58</sup> Veterans Education Success, “Ashford’s Fight to Maintain GI Bill Access Raises Questions about the Enforcement and the Adequacy of Statutory Requirements” (2017), available at <https://vetsedsuccess.org/wp-content/uploads/2018/12/ashford-fight-gi-bill-access.pdf>; Veterans Education Success, “Enrollment Trends and Student Outcomes at Ashford University” (2017), available at [https://vetsedsuccess.org/wp-content/uploads/2019/09/AshfordFactSheet.FINAL\\_.pdf](https://vetsedsuccess.org/wp-content/uploads/2019/09/AshfordFactSheet.FINAL_.pdf); Veterans Education Success, “Veteran and Servicemember Complaints About Misconduct and Illegal Practices at Ashford University” (2017), available at <https://vetsedsuccess.org/wp-content/uploads/2018/09/VES-Ashford-Report-2017-Fall.pdf>; Veterans Education Success, “Sample Complaints From Veterans Who Attended Ashford” (2018), available at <https://vetsedsuccess.org/wp-content/uploads/2018/09/Ashford-Student-Veteran-Complaints.pdf>.

<sup>59</sup> Veterans Education Success, “Veteran and Servicemember Complaints About Misconduct and Illegal Practices at Ashford University” (2017), available at <https://vetsedsuccess.org/wp-content/uploads/2018/09/VES-Ashford-Report-2017-Fall.pdf>, 3.

<sup>60</sup> *Id.* at 4.

## 2. Reach Network search results are misleading because they wrongly give visitors the impression that schools will qualify students for licensed occupations

School searches on these websites are misleading because they wrongly give consumers the impression that the listed schools will qualify students for licensed occupations.<sup>61</sup> Running a search for accredited schools that offer doctorate degrees in psychology produced the following list of schools:

**Accredited Schools Offering Online Psychology Degrees**

We have found 4 accredited schools that meet your criteria. They are a part of over 200 partner colleges with whom we have an advertising relationship. This allows us to provide accurate, up-to-date information about program offerings, accreditation, and tuition. Our Recommendation Rate is based on the largest database of independent reviews submitted by former students and is not impacted by the partnership.

Find an Online Degree:

REFINE YOUR SEARCH		
Most Affordable (2)	 <p><b>Grand Canyon University</b></p> <p>155 Programs, 4 Doctorates in Psychology (view all)</p> <ul style="list-style-type: none"> <li>PhD in General Psychology - Cognition and Instruction</li> <li>PhD in General Psychology - Integrating Technology, Learning, and Psychology</li> <li>PhD in General Psychology - Industrial and Organizational</li> <li>PhD in General Psychology - Performance Psychology</li> </ul> <p><b>Annual Tuition:</b> \$10,555 <b>Recommendation Rate:</b> 52%</p> <p><a href="#">Request Information</a> <a href="#">Learn More &gt;</a></p>	<p>Low Tuition</p>
	 <p><b>Regent University Online</b></p> <p>276 Programs, 15 Doctorates in Psychology (view all)</p> <ul style="list-style-type: none"> <li>Doctor of Education (Ed.D.) - Educational Psychology</li> <li>Ed.S. in Educational Leadership - Educational Psychology</li> <li>Ph.D. in Counseling &amp; Psychological Studies</li> <li>Ph.D. in Counseling &amp; Psychological Studies - Addictions Counseling</li> </ul> <p><b>Annual Tuition:</b> \$13,326 <b>Recommendation Rate:</b> 50%</p> <p><a href="#">Request Information</a> <a href="#">Learn More &gt;</a></p>	<p>Low Tuition</p> <p>Non-Profit</p>
	 <p><b>Northcentral University</b></p> <p>160 Programs, 15 Doctorates in Psychology (view all)</p> <ul style="list-style-type: none"> <li>PhD in Psychology - Gender Diversity Studies</li> <li>PhD in Psychology - General Psychology</li> <li>PhD in Psychology - Mental Health Policy and Practice</li> <li>PhD in Psychology - Trauma and Disaster Relief</li> </ul> <p><b>Annual Tuition:</b> \$17,526 <b>Recommendation Rate:</b> 49%</p> <p><a href="#">Request Information</a> <a href="#">Learn More &gt;</a></p>	
	 <p><b>California Coast University</b></p> <p>42 Programs, 1 Doctorate in Psychology (view all)</p> <ul style="list-style-type: none"> <li>Ed.D. Educational Psychology</li> </ul> <p><b>Recommendation Rate:</b> 90%</p> <p><a href="#">Request Information</a> <a href="#">Learn More &gt;</a></p>	<p>Recommended</p>

<sup>61</sup> A page featuring comparisons of for-profit colleges seems to promote Concord Law School without mentioning that it is not accredited by the American Bar Association, thereby preventing graduates from becoming licensed lawyers in nearly every state in the country. *Compare Online Schools*, GUIDE TO ONLINE SCHOOLS, <https://www.guidetoonlineschools.com/compare-schools> (last visited Oct. 23, 2019).

[Image above: “accredited” schools that offer doctorate degrees in psychology, downloaded January 31, 2020]

To be licensed as a clinical psychologist, students must graduate from a doctoral program accredited by the American Psychological Association (APA).<sup>62</sup> Of the schools listed above, only Regent University’s Clinical Psy.D. degree is APA accredited.<sup>63</sup> Grand Canyon University, Liberty University, Northcentral University, and California Coast University do not offer programs that are APA accredited. Grand Canyon University is currently being sued by former students in a class action lawsuit for “[inducing] students to enroll in online professional degree and certificate programs that are not accredited in most states.”<sup>64</sup>

Furthermore, many schools listed in SR Education Group rankings are excluded from these search results despite having APA accredited psychology programs. For example, the George Washington University, University of Virginia, Drexel University, Rutgers University, and DePaul University all have APA accredited doctorate programs in psychology, but they are not listed in these search results.<sup>65</sup> This demonstrates that it is likely that schools are paying to appear in the search results. It also demonstrates that SR Education Group is deceptively listing programs as being APA-accredited while excluding programs from the search results that actually qualify students to practice psychology. SR Education Group is misleading consumers by featuring programs that do not qualify graduates for licensed occupations and hiding those that do.

### 3. Reach Network’s advertising disclosures are deceptive

Advertising disclosures on SR Education Group websites are ambiguous, outside industry norms, and ultimately deceptive. In 2013, the Commission sent a letter to search engine companies, advising them of the need to distinguish between advertisements and search results.<sup>66</sup> The Commission stated that “consumers ordinarily expect that natural search results are included and ranked based on relevance to a search query, not based on payment from a third party.”<sup>67</sup> It also stated that “[i]ncluding or ranking a search result in whole or in part based on payment is a form of advertising” and that “consumers should be able to easily distinguish a natural search

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<sup>62</sup> Veterans Education Success, “The GI Bill Pays for Degrees that Do Not Lead to a Job” (2015), 7, available at <https://vetsedsuccess.org/wp-content/uploads/2015/09/gi-bill-pays-for-degrees-that-do-not-lead-to-a-job.pdf>; Veterans Education Success, “Despite a 2016 Statute, The GI Bill Still Pays for Degrees that Do Not Lead to a Job” (2018), 7, available at <https://vetsedsuccess.org/wp-content/uploads/2019/01/2018-career-ready-act-update.pdf>.

<sup>63</sup> *Accredited Doctoral Programs for Training in Health Service Psychology: 2018*, AMERICAN PSYCHOLOGICAL ASSOCIATION, <https://www.apa.org/ed/accreditation/about/index> (last visited Jan. 31, 2020).

<sup>64</sup> *Nationwide Class Action Lawsuit Alleges Fraud and RICO Against Grand Canyon University and Grand Canyon Education, Inc. for Enrolling Students in Unaccredited Programs*, Markets Insider (Jul. 19, 2019), <https://markets.businessinsider.com/news/stocks/nationwide-class-action-lawsuit-alleges-fraud-and-rico-against-grand-canyon-university-and-grand-canyon-education-inc-for-enrolling-students-in-unaccredited-programs-1028368551>.

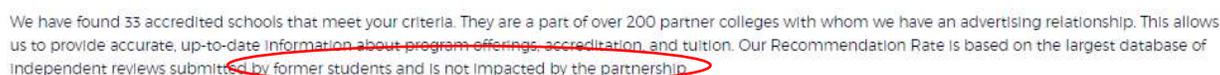
<sup>65</sup> *Id.*

<sup>66</sup> Federal Trade Commission, “Search Engine Letter” (2013), available at <https://www.ftc.gov/sites/default/files/attachments/press-releases/ftc-consumer-protection-staff-updates-agencys-guidance-search-engine-industryon-need-distinguish/130625searchenginegeneralletter.pdf>.

<sup>67</sup> *Id.* at 1.

result from advertising that a search engine delivers.”<sup>68</sup> The Commission identified labeling conventions adopted by search engines, including labeling the advertising results as “sponsored” or “ad,” background shading, and “placing advertising results above, below, or to the right-hand side of the natural results.”<sup>69</sup> The Commission cited case law holding that “[d]isclosures must be ‘sufficiently prominent and unambiguous to change the apparent meaning of the claims and to leave an accurate impression,’” and ultimately recommended that search engines use a text label that “(1) uses language that explicitly and unambiguously conveys if a search result is advertising; (2) is large and visible enough for consumers to notice it; and (3) is located near the search result or group of search results.”<sup>70</sup>

SR Education Group’s advertising disclosure does not make clear that its school searches are based on an advertising relationship, especially considering other information included in the disclosure.



We have found 33 accredited schools that meet your criteria. They are a part of over 200 partner colleges with whom we have an advertising relationship. This allows us to provide accurate, up-to-date information about program offerings, accreditation, and tuition. Our Recommendation Rate is based on the largest database of independent reviews submitted by former students and is not impacted by the partnership.

[Image above: SR Education Group search disclosure, downloaded October 7, 2019]

The disclosure states that schools listed in search results “are part of over 200 partner colleges with whom we have an advertising relationship.” The next sentence states that “[t]his allows us to provide accurate, up-to-date information about program offerings, accreditation, and tuition.” The disclosure also states that “[o]ur Recommendation Rate is **based on the largest database of independent reviews** submitted by former students and **is not impacted by the partnership**” (emphasis added). This violates the case law mentioned above, as the disclosure clearly implies the paid advertising relationship does not affect the search results. This is likely untrue because these are paid lead generator sites that are designed to increase the visibility of their partner schools.<sup>71</sup> The statement regarding “accurate, up-to-date information” and the claim that the “Recommendation Rate...is not impacted by the partnership” makes it seem as though the purpose of the advertising relationship is accuracy in search results while simultaneously stating that the search results are not affected by the advertising relationship. It is also radically different from the conventional search engine disclosure methods mentioned above.

SR Education Group’s disclosure does not meet the Commission’s recommendation. While it is located near the search results, it does not use language that explicitly and unambiguously conveys that the search results are advertising. Additionally, its text is much smaller than other text on SR Education Group’s websites. A reasonable consumer could easily overlook the disclosure, and even if he had the opportunity to read it, believe that the search results were not impacted by SR Education Group’s advertising relationship with partner schools.

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<sup>68</sup> *Id.*

<sup>69</sup> *Id.* at 2.

<sup>70</sup> *Id.* at 2-3.

<sup>71</sup> See page 38 above.

#### 4. Reach Network misrepresents student debt repayment rates

Reach Network misrepresents student debt repayment rates on one of its websites, *Guidetoonlineschools.com*. *Guidetoonlineschools.com* compares schools.<sup>72</sup> “Popular comparisons” include the University of Phoenix, Western Governors University, Kaplan University, Capella University, Ashford University, and Liberty University.

Popular Comparisons:

- [University of Phoenix vs. Western Governors University](#)
- [Kaplan University vs. Capella University](#)
- [Ashford University vs. Liberty University](#)

[Image above: SR Education Group “popular comparisons,” downloaded October 15, 2019]

The comparison between Ashford University and Liberty University claims that the number of students paying off their debt at both schools is higher than it really is. *Guidetoonlineschools.com* claims that 85% of Ashford graduates are “repaying” their student loans and 92% of Liberty University graduates are “repaying” their student loans. It states that it relied on “government databases” and its “extensive library of real student reviews.”<sup>73</sup> However, the information provided by *guidetoonlineschools.com* conflicts with the Department of Education’s data. According to the Department of Education’s College Scorecard, only 24.6% of Ashford students are paying down<sup>74</sup> their student loans within three years of leaving school, only 29.3% are paying down their loans within five years of leaving school, and only 36.7% are paying down their loans within seven years of leaving school.<sup>75</sup> Only 32.5% of Liberty University graduates are paying down their student loans within three years of leaving school, only 44.7% are paying down their loans within five years of leaving school, and only 58.5% are paying down their loans within seven years of leaving school.<sup>76</sup>

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<sup>72</sup> *Compare Online Schools*, GUIDE TO ONLINE SCHOOLS, <https://www.guidetoonlineschools.com/compare-schools> (last visited Oct. 23, 2019).

<sup>73</sup> *Id.*

<sup>74</sup> This is defined as the share of student borrowers who have paid at least one dollar of the principal balance on their federal loans within three years of leaving school. See *Technical Documentation: College Scorecard Institution-Level Data*, COLLEGE SCORECARD, 30-31, <https://collegescorecard.ed.gov/assets/FullDataDocumentation.pdf> (last visited Nov. 25, 2019).

<sup>75</sup> *Ashford University*, COLLEGE SCORECARD, <https://collegescorecard.ed.gov/school/?154022-Ashford-University> (last visited Oct. 23, 2019); *Data Documentation*, COLLEGE SCORECARD, <https://collegescorecard.ed.gov/data/documentation/> (last visited Nov. 25, 2019).

<sup>76</sup> *Liberty University*, COLLEGE SCORECARD, <https://collegescorecard.ed.gov/school/?232557-Liberty-University> (last visited Oct. 23, 2019); *Data Documentation*, COLLEGE SCORECARD, <https://collegescorecard.ed.gov/data/documentation/> (last visited Nov. 25, 2019).

## Loan Default Rates

One other major statistic that separates Liberty University from Ashford University is the student loan default rate. Currently, about 92% of Liberty University graduates are repaying their loans, versus 85% of Ashford University graduates. More Liberty University graduates are keeping up their financial obligations, despite the fact that the school's tuition is about twice that of Ashford University's.

This difference in repayment rate may mean that Liberty students find it easier to locate steady employment after graduation, in order to keep up their loan payments. Kayla, a bachelor's graduate in criminal justice from Liberty, had this to say about how her degree is viewed by employers: "I recently went to a job interview and the interviewers commented on how they were impressed that I had graduated with high honors from Liberty University since the school has a very solid reputation."

[Image above: SR Education Group "loan default rate" comparison, downloaded October 15, 2019]

### 5. Reach Network misleads prospective students about for-profit and non-profit colleges

*Guidetoonlineschools.com* also equates for-profit schools and non-profit schools by using misleading data analysis. Notably, *guidetoonlineschools.com* features the article *The Truth About Online Learning: 4,650 Students Speak Up*.<sup>77</sup> The article relies on comments and reviews submitted by students (including anonymous reviews) on its sister website, *gradreports.com*, to compare for-profit and non-profit schools.

#### The Truth About Online Learning: 4,650 Students Speak Up

5.25 million students were enrolled in distance education courses in 2013, as reported in the Online Learning Consortium's 2014 Survey of Online Learning. Due to the growing numbers of online students, it's crucial we ask questions about the state of online learning and the quality of programs. Our study of 4,000+ online student reviews submitted to *GradReports.com* since 2008 cites a wide range of experiences at recognizable schools like Liberty University, University of Phoenix, and Arizona State University.

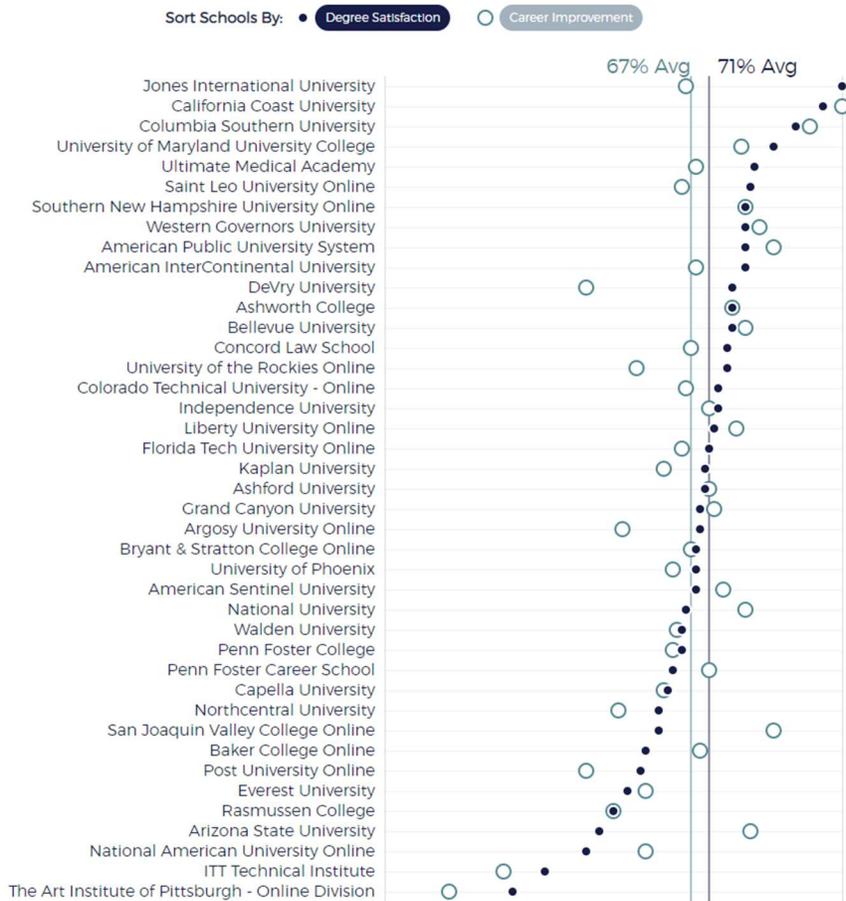
What we found: while online students rate their experiences lower than campus students, 71% of all online learners are satisfied with their degrees. Also, the complaints of online students aren't about the quality of instruction—they are about lackluster support services, with unresponsive financial aid and academic advising staff causing missed deadlines and, ultimately, causing some students to drop out.

[Image above: "The Truth About Online Learning" introductory paragraph, downloaded October 3, 2019]

The article compares "degree satisfaction" and "career improvement" at 41 online schools, including the for-profit American Public University System, American InterContinental University, DeVry University, Colorado Technical University, Ashford University, and the University of Phoenix - all of which have faced law enforcement action for defrauding students.

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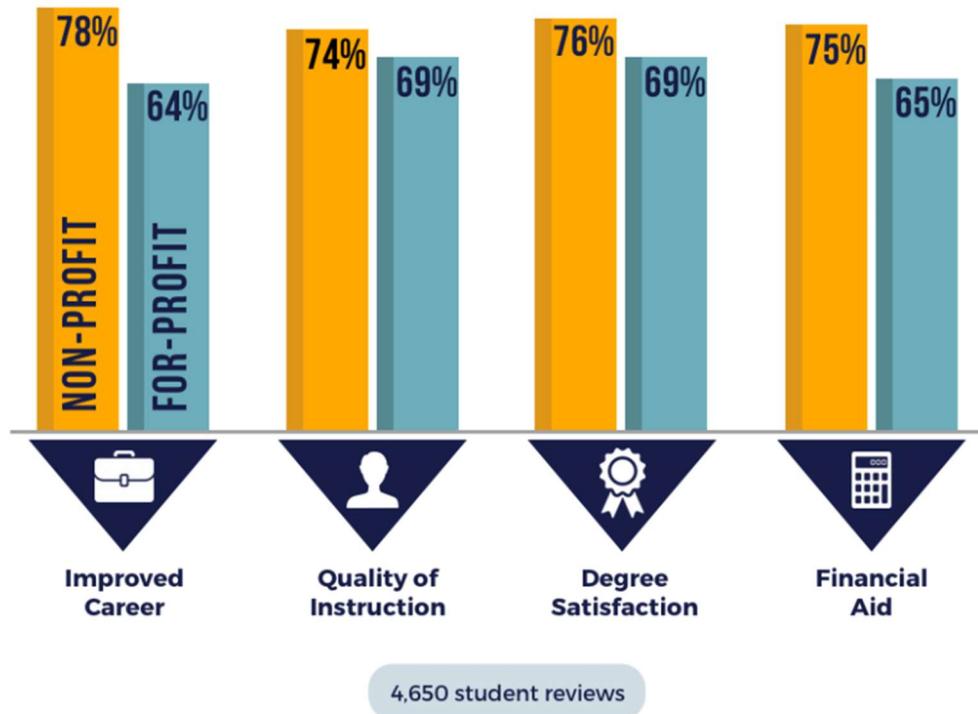
<sup>77</sup> Guide to Online Schools, "The Truth About Online Learning: 4,650 Students Speak Up," available at <https://www.guidetoonlineschools.com/resources/the-truth-about-online-learning>.



[Image above: SR Education Group graph, downloaded October 3, 2019]

While directly addressing “controversies surrounding for-profit institutions,” the article states that there is only a 9% average difference in student ratings between for-profit and online non-profit schools.

Online for-profit vs. online non-profit schools - how do they stack up?



Based on recent controversies surrounding for-profit institutions, we thought it would be helpful to look at the differences between for-profit online colleges vs. non-profit online colleges. We looked at a sample of 4,650 online student reviews to view comparisons. Based on our analysis, the average difference in ratings between online for-profit and online non-profit schools was 9%, suggesting that structural deficiency may be a bigger factor than the business model.

[Image above: SR Education Group graph, downloaded October 3, 2019]

The article states that it compared 4,650 online student reviews, but does not specify which schools it compared or how these student reviews were selected. *Gradreports.com* claims it has 32,867 reviews from 5,585 colleges on its homepage. Again, *guidetoonlineschools.com* lists only 41 schools by name in this article.

**5,585 COLLEGES | 32,867 REVIEWS | 76,801 DEGREES**

[Image above: Grad Reports review claims, downloaded October 18, 2019]

Many non-profit schools that offer online degree programs were apparently excluded from the comparison, and none of the “Best Online Colleges & Degrees” schools are directly mentioned or displayed in this article. Excluded schools include George Washington University and the University of Virginia, as shown by the screenshot below.

All 2019-2020 tuition numbers were manually collected and verified

Rank	School	Undergrad Tuition	Undergrad Salary	Grad Tuition	Grad Salary
#1	The George Washington University	\$18,450	\$103k	\$17,640	\$121k
#2	University of Virginia	\$13,260	\$103k	\$8,115	\$113k
#3	University of Massachusetts-Lowell	\$33,004	\$100k	\$21,975	\$117k
#4	Florida Institute of Technology	\$15,428	\$96k	\$12,821	\$115k
#5	Golden Gate University	\$20,460	\$93k	\$14,850	\$117k
#6	Oregon State University	\$13,905	\$93k	\$12,880	\$109k
#7	Rutgers University	\$19,200	\$99k	\$13,248	\$103k
#8	DePaul University	\$23,040	\$89k	\$15,065	\$112k
#9	University of Minnesota Digital Campus	\$13,364	\$92k	\$9,243	\$106k
#10	Drexel University	\$38,475	\$98k	\$29,969	\$104k
#11	Texas Tech University	\$9,090	\$92k	\$5,295	\$103k
#12	Washington State University	\$11,550	\$92k	\$8,925	\$103k

[Image above: “Best Online Colleges & Degree” ranking, downloaded October 3, 2019]

The student reviews on *gradreports.com* on which the article relied in its analysis are abnormally positive. Ashford University has a 4-star rating, with 67% of reviews recommending it and 70% claiming their degree from Ashford improved their career.

Search Reviews by College:

### Ashford University Reviews

Was this page helpful?

Currently showing only reviews from online students. [Remove \[x\]](#)



646 Reviews

[Learn More](#)

[Or Write a Review](#)

**67%**

Recommend This School

**70%**

Degree Improved Career

5 stars  (189)

4 stars  (282)

3 stars  (38)

2 stars  (52)

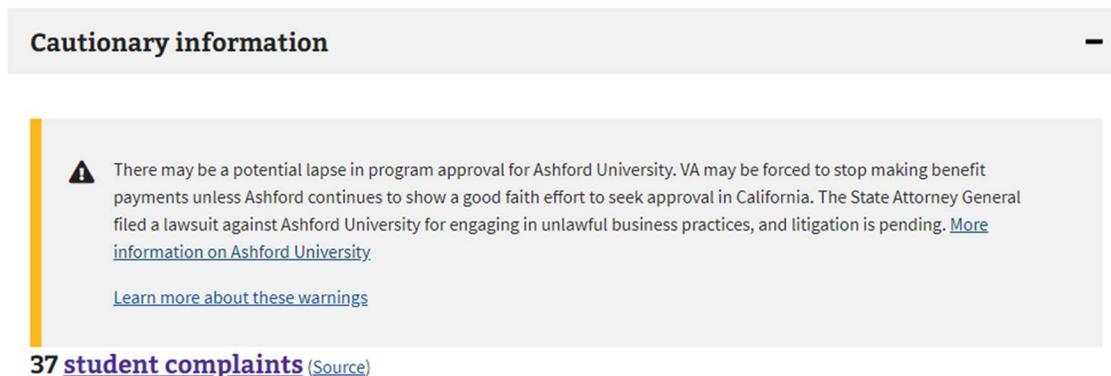
1 star  (85)

[Image above: Grad Reports Ashford University review, downloaded on October 4, 2019]

By contrast, the College Scorecard shows that Ashford has a 28% graduation rate with 24.6% of students paying down their debt within three years of leaving the school.<sup>78</sup> Veterans Education

<sup>78</sup> Ashford University, COLLEGE SCORECARD, <https://collegescorecard.ed.gov/school/?154022-Ashford-University> (last visited Nov. 25, 2019); Data Documentation, COLLEGE SCORECARD, <https://collegescorecard.ed.gov/data/documentation/> (last visited Nov. 25, 2019).

Success has received 109 complaints from student veterans about Ashford.<sup>79</sup> Like these student complaints, the California Attorney General’s lawsuit against Ashford makes clear that many students are not satisfied with Ashford.<sup>80</sup> The GI Bill Comparison Tool also posted a cautionary warning on Ashford’s profile.<sup>81</sup>



[Image above: GI Bill Comparison Tool cautionary warning on Ashford University, downloaded October 17, 2019]

This data analysis is misleading because *guidetoonlineschool.com* seems to have cherry-picked schools to compare while excluding many high-ranking non-profit colleges. In addition, relying on student reviews is problematic because it is unclear how this universe of students was selected and whether it provides a representative sample, and because reviews may be submitted anonymously. For example, schools could hire people to submit fake comments to boost their percentages on SR Education Group websites. Aside from its methodological flaws, it is likely that this article is a form of advertising conducted by SR Education Group for its partner schools, given its clear profit motivation evidenced by its paid packages of lead generation. Notably, the article showcases many of the schools that are listed in the SR Education Group website college search results.

## 6. Reach Network misrepresents tuition listings

Reach Network also misrepresents annual tuition at its partner schools. For example, *graduateprograms.com* lists Liberty University’s annual tuition at \$8,475.

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<sup>79</sup> Veterans Education Success, “Summary of Veteran and Servicemember Student Complaints about Ashford University” (2020), available at <https://vetsedsuccess.org/summary-of-veteran-and-servicemember-student-complaints-about-ashford-university/> (last visited Apr. 21, 2020).

<sup>80</sup> Andy Thomason, *3 Startling Claims From California’s Lawsuit Against a For-Profit College*, *The Chronicle of Higher Education* (Nov. 29, 2017), <https://www.chronicle.com/article/3-Startling-Claims-From/241924?cid=rclink>.

<sup>81</sup> *Id.*

[Image above: Liberty University in the search results, downloaded October 18, 2019]

By contrast, the GI Bill Comparison tool states that the VA would pay \$21,310 annually to Liberty.<sup>82</sup> College Scorecard lists “average annual cost” at \$27,883.<sup>83</sup>

Ashford’s listed tuition also seems misleading:

[Image above: Ashford University in the search results, downloaded October 18, 2019]

While the GI Bill Comparison tool states that the VA would pay \$24,447 annually to Ashford, College Scorecard lists “average annual cost” at \$18,749.<sup>84</sup> In contrast, SR Education Group lists Ashford’s tuition as between \$10,386 and \$15,192. SR Education Group is apparently making it

<sup>82</sup> Liberty University, GI BILL COMPARISON TOOL, <https://www.va.gov/gi-bill-comparison-tool/profile/31926246> (last visited Nov. 25, 2019).

<sup>83</sup> Liberty University, COLLEGE SCORECARD, <https://collegescorecard.ed.gov/school/?232557-Liberty-University> (last visited Apr. 21, 2020).

<sup>84</sup> Ashford University, GI BILL COMPARISON TOOL, <https://www.va.gov/gi-bill-comparison-tool/search?category=school&name=ASHFORD+UNIVERSITY> (last visited Apr. 21, 2020); Ashford University, COLLEGE SCORECARD, <https://collegescorecard.ed.gov/school/?154022-Ashford-University> (last visited Apr. 21, 2020).

seem as though tuition at these schools is lower than it really is in an effort to make them more attractive options for prospective students.

## 7. Reach Network targets veterans and servicemembers

Reach Network claims through its SR Education Group website that it offers military scholarships, and requests information about military affiliation from students in order to target veterans and servicemembers. As mentioned above, this is not an innocent inquiry. The 90/10 rule provides a perverse incentive to for-profit colleges to target veterans and servicemembers.<sup>85</sup>

Scholarship Name	Award	Deadline	Scholarship Application
<b>Community College Scholarship</b> <i>Eligibility:</i> Students enrolled at a public community college, junior college, technical college, or city college, and working towards a certificate, diploma, or degree.	\$5,000	Dec 29, 2019	Apply
<b>Military Scholarships</b> <i>Eligibility:</i> Students who are veterans or active members of the U.S. military and are enrolled at a private or public educational institution, and working towards a certificate, diploma, or degree.	\$5,000	Dec 29, 2019	Apply
<b>Undergraduate Scholarship</b> <i>Eligibility:</i> Undergraduate students enrolled at a private or public educational institution, and working towards a certificate, diploma, or degree.	\$5,000	Dec 29, 2019	Apply
<b>Graduate Scholarship</b> <i>Eligibility:</i> Graduate students enrolled at a private or public educational institution, and working towards a certificate, diploma, or degree.	\$5,000	Dec 29, 2019	Apply

[Learn More](#)

[Image above: SR Education Group scholarship listing, downloaded October 17, 2019]

Selecting “Request Information” for a particular school in search results brings visitors to the following page:

<sup>85</sup> 90/10 Rule, FINAID, <http://www.finaid.org/loans/90-10-rule.phtml> (last visited Oct. 23, 2019).

You're on the last step to finding your future school!

Choose Your Degree
  Choose Your School
  **3 Request Information**


**Ashford**  
UNIVERSITY

Please fill out the form below to get more information about programs offered by the school.

**1. Select a Program**

Accounting  
 All Programs

All Bachelors  
 Bachelors Degrees (2)  
 BA/Accounting  
 BA/Consumer and Family Financial Services

Not currently accepting inquiries from DC, MA or PR. Certain degree programs may not be available in all states.

**2. Contact Information**

First Name  Last Name   
**Required**  
 Mailing Address   
 City  State  Zip   
 Primary Phone  Alternate Phone  E-mail Address

**3. Tell Us About Yourself**

Highest Education Completed   
 High School Grad Year   
 Age   
 Military Affiliation

**4. Submit Your Request**

By clicking "Request Information", I consent to receive phone calls, pre-recorded messages and/or text messages about educational services from Ashford University at the phone number(s) provided, including a wireless number, using automated technology. Submitting this form is required for Ashford University to contact me, without obligation to attend the University.

[Request Information](#)

[Please review our Privacy Policy](#)

[Image above: Ashford University form, downloaded October 9, 2019]

Section “3” requests information about “Military Affiliation.”

**3. Tell Us About Yourself**

Highest Education Completed

High School Grad Year

Age

Military Affiliation

[Image above: military affiliation inquiry, downloaded October 9, 2019]

After a Veterans Education Success employee submitted personal information and selected “Veteran” under “Military Affiliation,” an Ashford admissions representative sent him the following email:

I hope you are taking the time to learn all about your education options. Here are some helpful links to learn a little bit more about the resources for military members, veterans, and their spouses at Ashford University:

[Ashford Military Grant](#)  
[Military Resources](#)  
[Military FAQs](#)

To learn more, please give us a call at 888-216-1376 and ask to speak to a military enrollment services advisor.

Sincerely,

**MINAS BE-EMNET** / Director of Enrollment Services  
Ashford University / *Technology Changes Everything™*

[Image above: email from Ashford University admissions representative, downloaded October 15, 2019]

SR Education Group is providing its client schools with the military affiliation of prospective students, which is the information unscrupulous colleges need to target servicemembers and veterans.

Reach Network websites also list “military friendly” schools.<sup>86</sup> In its methodology to determine whether a school is “military friendly,” *guidetoonlineschools.com* directly references the Department of Veterans Affairs Principles of Excellence program established by Executive Order 13607.

**Military Culture:** Military culture refers to the level of commitment that schools show to accommodating military students and creating an environment in which they will succeed and feel comfortable. Each school's military culture score was determined by a variety of factors, including the number of GI Bill students currently enrolled at the school, and whether or not the school participates in the many government programs designed to serve military students. For example, schools that are signatories of the Principles of Excellence program have agreed to accommodate student absences that are due to service requirements and refrain from fraudulent or aggressive recruiting techniques, and schools that are signatories of the 8 Keys to Veteran Success program are committed to monitoring veteran outcomes and training staff members on issues specific to veterans. The other government programs that were considered in these rankings are the Yellow Ribbon program and the Department of Defense Voluntary Education Partnership Memorandum of Understanding, which hold participating schools to extremely high standards with respect to educating military students.

[Image above: SR Education Group “military friendly” methodology, downloaded October 15, 2019]

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<sup>86</sup> 2019 Best Military-Friendly Online Colleges, GUIDE TO ONLINE SCHOOLS, <https://www.guidetoonlineschools.com/online-schools/military-friendly> (last visited Oct. 24, 2019).

The Principles of Excellence require schools to “[e]nd fraudulent and aggressive recruiting techniques and misrepresentations,” yet *guidetoonlineschools.com* lists many schools guilty of such practices as being “military friendly.”<sup>87</sup> For example, Liberty University, Trident University, and Grantham University are listed as being “military friendly.” In 2017, Veterans Education Success discovered that Trident University attempted to recruit children and widows of military servicemembers killed on active duty using misleading information at Tragedy Assistance Program for Survivors (“TAPS”) events.<sup>88</sup> According to the New York Times, Liberty University used many of the same deceptive practices as for-profit schools like the University of Phoenix, but evaded regulatory scrutiny due to its non-profit status.<sup>89</sup> Liberty, Trident, and Grantham also receive millions in GI Bill tuition and fees, yet spend a small percentage of gross fees and tuition on instruction. Liberty University received \$33,189,893 in GI Bill tuition and fees in 2017 but spent only 19% of gross tuition and fees on instruction.<sup>90</sup> Trident University received \$11,308,126 in GI Bill tuition and fees in 2017 but spent only 19.5% of gross fees and tuition on instruction.<sup>91</sup> Grantham received \$9,724,208 in GI Bill tuition and fees in 2017 but spent only 15.9% of gross tuition and fees on instruction.<sup>92</sup> By contrast, Washington University in St. Louis received \$3,322,768 in GI Bill tuition and fees in 2017 and spent 289.5% of gross tuition and fees on instruction.<sup>93</sup>

## **8. Reach Network misrepresents which schools participate in the Yellow Ribbon Program**

*Guidetoonlineschool.com* makes it seem as though schools are not participants in the Yellow Ribbon Program when they really are. This is problematic because the Yellow Ribbon Program enables GI Bill recipients to have their full tuition at private schools paid or waived

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<sup>87</sup> *Principles of Excellence*, DEP’T OF VETERANS AFFAIRS, [https://www.benefits.va.gov/gibill/principles\\_of\\_excellence.asp](https://www.benefits.va.gov/gibill/principles_of_excellence.asp) (last visited Oct. 24, 2019).

<sup>88</sup> Veterans Education Success, “Is Trident University A Good Choice For Military-Connected Students?” (2018), 2, available at <https://vetsedsuccess.org/wp-content/uploads/2018/10/trident-oct-2018.pdf> (“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.”).

<sup>89</sup> Alec MacGillis & ProPublica, *How Liberty University Built a Billion-Dollar Empire Online*, NY TIMES (Apr. 17, 2018), <https://www.nytimes.com/2018/04/17/magazine/how-liberty-university-built-a-billion-dollar-empire-online.html> (“Liberty’s tax filings show that in 2016, the university paid Google \$16.8 million for ‘admissions leads generation.’ In other words, advertising Liberty to those searching online for degree options.”). Liberty also targets servicemembers and veterans. “A separate division of about 60 [recruiters] focuses on courting members of the military, who have access to even greater federal tuition assistance, and then advising them on campus. A former employee in that division said that given the smaller crew, the work there was if anything even more intense than in the main branch: More than 30,000 L.U.O. students are from the military or military families.”

<sup>90</sup> Veterans Education Success, “Should Colleges Spend the GI Bill on Veterans’ Education or Late Night TV Ads?” (2019), 12, available at [https://vetsedsuccess.org/wp-content/uploads/2019/04/VES\\_Instructional\\_Spending\\_Report\\_FINAL.pdf](https://vetsedsuccess.org/wp-content/uploads/2019/04/VES_Instructional_Spending_Report_FINAL.pdf).

<sup>91</sup> *Id.*

<sup>92</sup> *Id.*

<sup>93</sup> *Id.* at 9.

even though they exceed the GI Bill's cap.<sup>94</sup> In its list of "military friendly" schools, *guidetoonlineschools.com* includes "Top Yellow Ribbon Online Schools." "Top Yellow Ribbon Online Schools" have a small yellow ribbon icon by their names:



[Image above: SR Education Group yellow ribbon symbol, downloaded October 3, 2019]

Hovering over the icon displays the following message: "This indicates that a school is a 2018 Top Yellow Ribbon Online School." On a separate page, *guidetoonlineschools.com* elaborates that yellow ribbon icons are listed by schools only if they support an unlimited number of students and offer unlimited financial contributions through the Yellow Ribbon Program.

#### 2019 Best Yellow Ribbon Online Schools

Beyond our comprehensive list of military-friendly online colleges, we have created a list of the best 20 online schools that support an unlimited number of students and offer unlimited financial contributions through the Yellow Ribbon Program. The Yellow Ribbon Program allows colleges and universities to choose to support a certain number of veterans with funds that go towards tuition, which the U.S. Department of Veterans Affairs then agrees to match.

Our internal scoring system is based on government collected data from the GI Bill Comparison Tool, which provides veterans, servicemembers, and dependents with information about their Post 9/11 GI Bill benefits and Veteran Affairs approved schools. You can read our full methodology here.

[Image above: "2019 Best Yellow Ribbon Online Schools," downloaded October 3, 2019]

This is deceptive because not all schools that participate in the Yellow Ribbon Program support an unlimited number of students or offer unlimited financial contributions. For example, George Mason University and American University do not have the yellow ribbon icon by their names, despite participating in the Yellow Ribbon Program in 2018.<sup>95</sup>

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<sup>94</sup> *Yellow Ribbon Program*, DEP'T OF VETERANS AFFAIRS, [https://www.benefits.va.gov/gibill/yellow\\_ribbon.asp](https://www.benefits.va.gov/gibill/yellow_ribbon.asp) (last visited Oct. 25, 2019).

<sup>95</sup> *VA State Yellow Ribbon Program Information 2018 – 2019*, DEP'T OF VETERANS AFFAIRS, [https://www.benefits.va.gov/gibill/yellow\\_ribbon/2018/states/va.asp](https://www.benefits.va.gov/gibill/yellow_ribbon/2018/states/va.asp) (last visited Oct. 25, 2019).

Comprehensive List of Military-Friendly Accredited Online Schools (50)

REFINE YOUR SEARCH	School	Annual Tuition	Military-Friendly Score
Non-Profit Schools (46)	American Public University System	\$8,100	98.27
Level	American University	\$66,612	82.48
Associate (18)	Arizona State University	\$10,104	99.37
Bachelor's (48)	Austin Peay State University	\$28,380	96.63
Master's (49)	Bellevue University	\$13,280	94.02
Doctoral (33)	Colorado State University-Global Campus	\$8,400	85.33
Certificate (48)	Columbia Southern University	\$6,750	96.76
	DePaul University	\$18,900	88.87
	Eastern Kentucky University	\$12,270	87.42
	Embry-Riddle Aeronautical University-Worldwide	\$11,700	88.63
	Excelsior College	\$15,300	85.99
	George Mason University	\$32,520	92.00
Non-Profit Schools (46)	Georgia State University	\$27,304	92.47
Level	Grantham University	\$8,215	86.48
Associate (18)	Hawaii Pacific University	\$25,630	95.44
Bachelor's (48)	Indiana University - Bloomington	\$9,460	89.66
Master's (49)	IUPUI	\$28,727	85.46
Doctoral (33)	Lewis University	\$32,300	70.07
Certificate (48)	Liberty University	\$11,700	99.46
	Metropolitan State University of Denver	\$19,425	92.37
	Mississippi State University	\$11,036	85.88
	North Carolina State University	\$27,094	89.51
	Norwich University	\$11,250	92.10
	Oklahoma State University-Main Campus	\$28,918	87.68
	Old Dominion University	\$11,670	97.88
	Rochester Institute of Technology	\$29,340	86.32
REFINE YOUR SEARCH	Saint Xavier University	\$17,250	72.74
Non-Profit Schools (46)	San Diego State University	\$15,642	87.01
Level	Texas A&M University-College Station	\$23,138	95.51
Associate (18)	Texas State University	\$13,370	92.91
Bachelor's (48)	Texas Tech University	\$21,330	89.91
Master's (49)	Thomas Edison State University	\$9,967	86.07
Doctoral (33)	Trident University International	\$11,550	90.44
Certificate (48)	University of Alabama at Birmingham	\$13,230	89.56
	University of Colorado Colorado Springs	\$17,074	96.90
	University of Colorado Denver	\$14,940	92.38
	University of Denver	\$28,935	74.21
	University of Kansas	\$11,592	88.52
	University of Kentucky	\$12,070	86.35
	University of Maryland Global Campus	\$14,970	99.49
	University of Massachusetts-Lowell	\$11,400	85.10
	University of Minnesota Digital Campus	\$11,864	88.59

REFINE YOUR SEARCH			
Non-Profit Schools (46)	University of Nebraska at Omaha	🟡 \$16,050	89.11
Level	University of North Texas	\$11,520	91.03
Associate (18)	University of Oklahoma-Norman Campus	🟡 \$26,029	88.75
Bachelor's (48)	University of South Florida - Main Campus	\$17,324	96.31
Masters (49)	University of Southern California	🟡 \$19,872	97.50
Doctoral (33)	The University of Texas at San Antonio	\$21,039	88.51
Certificate (48)	University of the Incarnate Word	🟡 \$15,900	96.34
	Western Governors University	\$6,380	90.85

Understanding this list: Military-Friendly Scores were calculated using data from the government's GI Comparison Tool, which evaluates factors relating to military culture, online support, flexibility, and financial assistance.

[Images above: SR Education Group “military friendly” schools, downloaded October 3, 2019]

This methodology uses the well-known “Yellow Ribbon” in a manner inconsistent with its actual meaning and common understanding. By redefining what “Yellow Ribbon” stands for, it has the likelihood of affirmatively misleading military-connected students.

Student veterans looking for schools that participate in the Yellow Ribbon Program might assume that “military friendly” schools without the yellow ribbon icon do not participate in the program and overlook the school. SR Education Group is giving the impression that the “Best Yellow Ribbon Online Schools” are the only schools at which this military education benefit can be utilized.

### III. Legal Analysis

The companies named in this complaint are likely engaged in prohibited unfair and deceptive practices. Section 5(a) of the FTC Act, 15 U.S.C. § 45(a), prohibits “unfair or deceptive acts or practices in or affecting commerce.”

#### A. QuinStreet, Reach Network, and schools that use their lead generation services are engaged in unfair practices

According to Commission policy, a trade practice is unfair if it:

1. Causes or is likely to cause substantial injury to consumers;
2. Is not reasonably avoidable by consumers themselves; and
3. Is not outweighed by countervailing benefits to consumers or to competition.<sup>96</sup>

<sup>96</sup> Federal Trade Commission, “FTC Policy Statement on Unfairness” (1980), available at <http://www.ftc.gov/bcp/policystmt/ad-unfair.htm>.

Under the first prong, substantial injury usually involves monetary harm.<sup>97</sup> The second prong is an effort to ensure that consumer decision making still governs the market by limiting the Commission to act in situations where seller behavior “unreasonably creates or takes advantage of an obstacle to the free exercise of consumer decision making.”<sup>98</sup> Sellers may not withhold from consumers important price or performance information, engage in coercion, or unduly influence highly susceptible classes of consumers.<sup>99</sup> Under the third prong, the Commission will not find a practice unfair “unless it is injurious in its net effects.”<sup>100</sup>

Additionally, the Commission will look at “whether the conduct violates public policy as it has been established by statute, common law, industry practice, or otherwise.”<sup>101</sup> Public policy is used to “test the validity and strength of the evidence of consumer injury, or, less often, it may be cited for a dispositive legislative or judicial determination that such injury is present.”<sup>102</sup> The harms of the online marketers outlined above are within the scope of the Commission’s authority to enforce Section 5 of the FTC Act, and they should face Commission action for these violations.

Here, the trade practices of QuinStreet, Reach Network, and the schools that used their lead generation services are likely to cause substantial injury because consumers are presented with a list of poor-performing colleges that have bad student outcomes. QuinStreet and Reach Network present themselves as unbiased sources while simultaneously promoting these schools. Consumers are also deceived about the true cost of attendance at colleges. Students suffer monetary harm when they incur large amounts of student loan debt at substandard schools and are unable to find gainful employment. Additionally, the injury is one which consumers could not reasonably avoid. QuinStreet, Reach Network, and their partner schools are providing consumers with inaccurate price and performance information about these colleges. Finally, the conduct of QuinStreet, SR Education Group, and their partner schools is injurious in its net effects. While some of the information offered on their websites might be useful to consumers, such as the *guidetoonlineschools.com* article that provides financial aid advice, such information is merely a cover for its lead generation services, and the harm caused by those services outweighs any benefit a site visitor would receive. Even still, important information provided by SR Education Group websites is often inaccurate and misleading, such as school rankings and pages that explain veterans’ benefits.

Lastly, the conduct of QuinStreet, Reach Network, and the schools that use their lead generator services violates public policy. This is demonstrated by QuinStreet’s settlement with 20 state attorneys general and the Commission’s lawsuits against Career Education Corporation and Victory Media for their use of deceptive lead generator websites.<sup>103</sup> The Commission and

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<sup>97</sup> *Id.*

<sup>98</sup> *Id.*

<sup>99</sup> *Id.*

<sup>100</sup> *Id.*

<sup>101</sup> *Id.*

<sup>102</sup> *Id.*

<sup>103</sup> Securities and Exchange Commission, “Assurance of Voluntary Compliance” (2012), available at <https://www.sec.gov/Archives/edgar/data/1117297/000119312512284713/d372925dex101.htm>; *U.S. v. Career*

state attorneys general have determined that deceptive lead generator websites violate public policy and have taken steps to shut them down.

## **B. QuinStreet, Reach Network, and the schools that use their lead generator services are engaged in deceptive practices**

According to Commission policy, there are three requirements in order for the Commission to make a finding of deception:

- 1) There must be a representation, omission, or practice that is likely to mislead the consumer;
- 2) The act or practice must be considered from the perspective of a reasonable consumer; and
- 3) The representation, omission, or practice must be material.<sup>104</sup>

Under the first prong, the relevant inquiry is whether an act or practice is likely to mislead.<sup>105</sup> Under the second prong, “[w]hen representations or sales practices are targeted to a specific audience, the Commission determines the effect of the practice on a reasonable member of that group.”<sup>106</sup> Additionally, “the Commission considers the totality of the practice in determining how reasonable consumers are likely to respond.”<sup>107</sup> Under the third prong, the Commission must determine whether consumers would have chosen another product if the deception had not occurred. Express claims are presumed material.<sup>108</sup> Materiality is also presumed for claims and omissions involving “health, safety, or other areas with which the reasonable consumer would be concerned.”<sup>109</sup> The harms of the online marketers outlined above are within the scope of the Commission’s authority to enforce Section 5 of the FTC Act, and they should face Commission action for these violations.

By way of example, in 2017, the Commission announced a consent agreement with Victory Media LLC for violating Section 5 of the FTC Act in connection with its promotion of post-secondary schools to military consumers. Victory Media purported to help servicemembers and veterans find the right educational choice through an online Matchmaker tool that purports to search “military friendly” schools. According to the complaint, the company included schools as possible search results for its Matchmaker tool only if the schools paid it to be included, and

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*Education Corporation, et. al*, Complaint, August 27, 2019, available at [https://www.ftc.gov/system/files/documents/cases/career\\_education\\_corporation\\_complaint\\_8-27-19.pdf](https://www.ftc.gov/system/files/documents/cases/career_education_corporation_complaint_8-27-19.pdf); Federal Trade Commission, “Victory Media Settles FTC Charges Concerning Its Promotion of Post-Secondary Schools to Military Consumers” (2017), available at <https://www.ftc.gov/news-events/press-releases/2017/10/victory-media-settles-ftc-charges-concerning-its-promotion-post>.

<sup>104</sup> *Matter of Cliffdale Assocs., Inc.*, 103 F.T.C. 110 app. at 46 (1984); see also *Kraft, Inc. v. F.T.C.*, 970 F.2d 311, 314 (7th Cir. 1992); see also *F.T.C. v. Pantron I Corp.*, 33 F.3d 1088, 1095 (9th Cir. 1994).

<sup>105</sup> *Matter of Cliffdale Assocs.*, 103 F.T.C. at 46.

<sup>106</sup> *Id.*

<sup>107</sup> *Id.*

<sup>108</sup> *Id.* at 49-50.

<sup>109</sup> *Id.*

endorsed individual schools in certain articles, emails, and social media posts without disclosing that, in many cases, the schools paid the company to be endorsed in those specific materials.<sup>110</sup>

## 1. QuinStreet

QuinStreet has made representations and omissions and engaged in practices that are likely to mislead consumers. QuinStreet operates lead generator websites that make it seem as though school searches are based on government data and independent methodology when they are actually based on its advertising relationship with partner schools. These websites also display the same for-profit colleges in search results regardless of the zip code or topic of study submitted. Schools that are in close proximity to the zip codes are excluded. These representations, omissions, and practices are likely to mislead consumers. A reasonable consumer visiting QuinStreet websites would assume that information on its websites is accurate and based on independent methodology. In reality, content on QuinStreet websites is likely determined by an advertising relationship with its client schools, as evidenced by QuinStreet's promotion of its paid lead generation products, and is often misleading. A reasonable consumer would also assume that the schools that appear in search results are the closest schools available with the desired degree program. Instead, site visitors are presented with low-quality, poor-performing schools that are located thousands of miles away.

QuinStreet's representations, omissions, and practices should be presumed material. Higher education is an area with which a reasonable consumer would be concerned. Post-secondary and graduate degree programs require students to invest thousands of dollars and to dedicate years of study for successful completion. Additionally, school quality often determines students' ability to find gainful employment. A student's education and gainful employment represent important material interests to that student. Therefore, QuinStreet has made material representations and is engaging in deceptive practices.

## 2. Reach Network

Reach Network has made representations and omissions and engaged in practices that are likely to mislead consumers. Reach Network operates under the SR Education Group trade name in order to make it seem as though its lead generator websites are run by a non-profit organization. This is demonstrated by SR Education Group's use of the ".org" domain name and its display of a mission statement on *sreducationgroup.org* in similar fashion to non-profit organizations.<sup>111</sup> Reach Network operates lead generator websites that make it seem as though

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<sup>110</sup> U.S. Federal Trade Commission Press Release, "Victory Media Settles FTC Charges Concerning Its Promotion of Post-Secondary Schools to Military Consumers" (Oct. 19, 2017), <https://www.ftc.gov/news-events/press-releases/2017/10/victory-media-settles-ftc-charges-concerning-its-promotion-post>.

<sup>111</sup> See *Mission and Values*, AMERICAN RED CROSS, <https://www.redcross.org/about-us/who-we-are/mission-and-values.html> (last visited Nov. 12, 2019); see also *Amnesty International's Statute*, AMNESTY INTERNATIONAL, <https://www.amnesty.org/en/about-us/how-were-run/amnesty-internationals-statute/> (last visited Nov. 12, 2019); see also *About Us – Student Veterans of America*, STUDENT VETERANS OF AMERICA, <https://studentveterans.org/aboutus>

school searches are based on independent methodology when they are likely based on its advertising relationship with partner schools, as shown by its promotion of its paid lead generation products. Reach Network also wrongly makes it seem as though its partner schools will qualify students for licensed occupations. Reach Network publishes misleading research that equates for-profit colleges and non-profit colleges. Finally, Reach Network misrepresents debt repayment rates, tuition, quality of schools, and the availability of veterans' benefit programs at colleges. Based on its presentation, a reasonable consumer visiting Reach Network websites would assume that information on its websites is accurate and based on independent methodology. In reality, content on Reach Network websites is determined by an advertising relationship with partner schools and is often misleading.

Reach Network's representations, omissions, and practices should be presumed material. As mentioned above, higher education is an area with which a reasonable consumer would be concerned. Reach Network has made material representations and is likely engaged in deceptive practices.

### **3. The schools that used QuinStreet and Reach Network's lead generation services**

The QuinStreet and Reach Network client schools are likely engaged in deceptive practices. In August 2019, the Commission submitted a complaint against Career Education Corporation ("CEC") and its subsidiaries, including American InterContinental University, Inc., AIU Online, Inc., Marlin Acquisition Corp., Colorado Tech., Inc., and Colorado Technical University, Inc., for violating Section 5(a) of the FTC Act and the Telemarketing Sales Rule by using illegal and deceptive lead generators to "lure consumers to their post-secondary and vocational schools."<sup>112</sup> CEC used the services of 70 different lead generators, including the Sunkey entities and Fanmail, which operated *Army.com*, a website that masqueraded as an official US military page.<sup>113</sup> Considering that the QuinStreet and Reach Network partner schools are using illegal and deceptive lead generators to lure consumers, and many of these schools were listed as *Army.com* partner schools,<sup>114</sup> they should also be investigated for engaging in deceptive practices.

## **IV. Request for Action**

As the country's leading consumer protection agency, the Commission has a critical leadership role to play in this important marketplace. QuinStreet, Inc. and Reach Network, Inc.

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(last visited Nov. 12, 2019); *see also* *What We Do*, VETERANS EDUCATION SUCCESS, <https://vetsedsuccess.org/what-we-do/> (last visited Nov. 12, 2019).

<sup>112</sup> *U.S. v. Career Education Corporation, et. al*, Complaint, August 27, 2019, 5, available at [https://www.ftc.gov/system/files/documents/cases/career\\_education\\_corporation\\_complaint\\_8-27-19.pdf](https://www.ftc.gov/system/files/documents/cases/career_education_corporation_complaint_8-27-19.pdf).

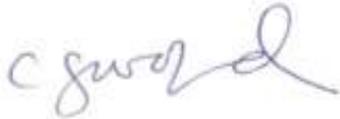
<sup>113</sup> *Id.* at 9.

<sup>114</sup> Veterans Education Success, "Army.com List of Partner Schools Revealed" (2019), available at <https://vetsedsuccess.org/wp-content/uploads/2019/08/army.com-report-on-partner-schools-final.pdf>.

likely violated Section 5(a) of the FTC Act, 15 U.S.C. § 45(a). Veterans Education Success respectfully requests that the Commission institute an investigation of these businesses, their websites, and their partner schools.

Respectfully Submitted,

VETERANS EDUCATION SUCCESS



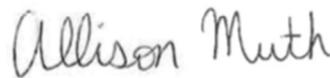
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