INVESTIGATIVE ANALYSIS
Advertising by For-Profit and Other Schools in Response to COVID-19

JULY 2020 REPORT
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ABOUT VETERANS EDUCATION SUCCESS

Veterans Education Success works to advance higher education success for veterans, servicemembers, and military families, and to protect the integrity and promise of the GI Bill and other federal education programs. We are policy experts, academic researchers, lawyers, and veterans’ advocates. Veterans Education Success provides:

- **Free Help for Veterans and Military-Connected Students**: Free legal services, advice, and college and career counseling for the GI Bill.
- **Research & Reports**: Non-partisan research on issues of concern to student veterans, including student outcomes and federal oversight.
- **Policy Advocacy**: Assistance to policymakers to improve higher education quality and veterans’ success and to protect the integrity of the GI Bill.
- **Civic Engagement**: Helping veterans participate in their democracy by engaging government officials and the media.
- **Legal Advocacy**: Free legal assistance for students and whistleblowers, and legal work building cases to stop college consumer fraud.
I. Introduction

In February 2020, the U.S. economy officially entered into a recession\(^1\) prompted by the COVID-19 pandemic and stay-at-home orders, with unemployment numbers higher than those of the Great Recession.\(^2\) During the last recession that began in December 2007, postsecondary enrollment increased, particularly at for-profit schools. (See our report on the counter cyclical relationship between recessions and college enrollment.)

Veterans Education Success was alerted to an increase in social media advertising by some schools, some of which have a history of predatory or aggressive marketing and recruiting. The schools we examined met one or more of the following criteria: (1) were profiled in a U.S. Senate Committee report of for-profit schools; (2) had faced law enforcement action for consumer protection violations; (3) were promoted by lead generation companies that may not adequately disclose to students the companies’ paid relationship to the schools they promote; or (4) converted from for-profit to nonprofit status or were for-profit before being purchased by a public institution.

To determine how these schools were responding to the COVID-19 pandemic, including the extent and nature of their advertising, and whether their ads were targeting veterans and military-connected students, we analyzed ads published between February and April 2020 on the Facebook Ad Library, which encompasses Facebook, Instagram, Facebook Messenger, and Facebook’s Audience Network.\(^3\)

II. Highlights

Eleven of the 27 schools showed an increase in the number of active ads from February through April. The 2- or 3-month change in ads ranged from a low of 147 percent to a high of almost 15,000 percent, and three schools had increases between 1,813 and 6,000 percent.

We identified six common advertising approaches in these ads:
- Ads referencing the COVID-19 pandemic, either through indirect reference (e.g., ads discussed homeschooling during “uncertain times” or praising “healthcare heroes”) or mentioned COVID-19 directly;
- Ads featuring healthcare-specific roles and targeting prospective students interested in working in healthcare;
- Ads touting an institution’s online programs and referencing the benefits of online learning;
- Ads promising low cost or scholarships;
- Ads referencing the ease of transferring credits from another institution; and

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\(^1\) National Bureau of Economic Research
\(^3\) Facebook’s Audience Network is an off-Facebook, in-app advertising network for mobile apps. Advertisers can use Facebook’s ad system beyond Facebook’s platforms to reach customers who are using mobile sites and apps. [https://www.facebook.com/audiencenetwork](https://www.facebook.com/audiencenetwork)
• Ads explicitly targeting servicemembers and veterans, a frequent target of for-profit schools because of the 90/10 loophole, which allows for-profit schools to circumvent the cap on Title IV funds the schools would otherwise face by counting GI Bill and military tuition assistance as non-federal revenue. It is worth noting that the majority of the ads targeted not just service members and veterans but underserved minorities.

III. Advertising Behaviors Changed After COVID-19 Was Declared a Pandemic

We noticed an increase in advertising by some of the 27 schools we examined and also identified six common themes in their advertising after COVID-19 became a pandemic.

*Increased Advertising.* Eleven of the 27 schools showed an increase in the number of active advertisements across the Facebook Ad Library (which encompasses Facebook, Instagram, Facebook Messenger, and Facebook’s Audience Network) between February—before the COVID-19 pandemic caused an increase in American hospitalization and deaths and stay-at-home orders took effect—and April 2020 (see Table 1). The 2- or 3-month change in ads ranged from a low of 147 percent to a high of almost 15,000 percent. Three schools had increases between 1,813 and 6,000 percent. Other schools showed a large number of active ads in April, but we were unable to determine the number of active ads in February and March in order to calculate the percentage change. In addition, the number of active ads fluctuated from day to day and may have been higher had we accessed them on a different day. Thus, one school had fewer than 40 active ads in late April, down from more than 100 earlier in the month.

### Table 1: Increase in Number of Active Facebook Ads from February Through April by 11 Schools

<table>
<thead>
<tr>
<th>Institution</th>
<th>February</th>
<th>March</th>
<th>April</th>
<th>2 or 3-month % change</th>
</tr>
</thead>
<tbody>
<tr>
<td>Capella Universitya</td>
<td>4</td>
<td>7</td>
<td>97</td>
<td>2,325%</td>
</tr>
<tr>
<td>ECPI Universityb</td>
<td>1</td>
<td>7</td>
<td>147</td>
<td>14,600%</td>
</tr>
<tr>
<td>Florida Career Collegec</td>
<td>-</td>
<td>17</td>
<td>142</td>
<td>735%</td>
</tr>
<tr>
<td>Grantham Universityd</td>
<td>34</td>
<td>-</td>
<td>84</td>
<td>147%</td>
</tr>
<tr>
<td>Grand Canyon Universitye</td>
<td>29</td>
<td>35</td>
<td>99</td>
<td>241%</td>
</tr>
<tr>
<td>Herzing University (Online)d</td>
<td>47</td>
<td>54</td>
<td>189</td>
<td>302%</td>
</tr>
<tr>
<td>Keiser Universityf</td>
<td>88</td>
<td>49</td>
<td>273</td>
<td>210%</td>
</tr>
<tr>
<td>Trident University Internationalc</td>
<td>3</td>
<td>62</td>
<td>12</td>
<td>300%</td>
</tr>
<tr>
<td>Universal Technical Institutec</td>
<td>8</td>
<td>140</td>
<td>153</td>
<td>1,813%</td>
</tr>
<tr>
<td>Ultimate Medical Academyc</td>
<td>17</td>
<td>57</td>
<td>50</td>
<td>194%</td>
</tr>
<tr>
<td>Walden Universityc</td>
<td>-</td>
<td>7</td>
<td>432</td>
<td>6,071%</td>
</tr>
</tbody>
</table>

Source: Analysis of active ads across the Facebook Ad Library by Veterans Education Success.

Note: A month without data does not mean no ads were published during the month. Rather, it means there were no active ads for that month on the day we queried the Facebook Ad Library. The dates we accessed the ads are provided in table notes and reflect the number of active ads for each of the 3 months as of those dates.
Facebook’s Ad Library does not display every ad that was ever published by a business. Advertisements about social issues, elections, or politics are retained even if they are inactive; ads that do not deal with these topics are listed in the ad library only if they are active, which likely understates the number of ads we found because ads about enrolling in school do not fall within the social or political issues Facebook retains. In addition, the number of active ads we observed was determined by the day we accessed the ad library and may have been higher or lower on a different day. For example, one school had fewer than 40 active ads at the end of April but had over 100 earlier in April.

Three schools whose ads we studied and are discussed in this report are not listed in Table 1. As of late April 2020, Concorde Career College, Fortis College, and the University of Phoenix had 1,498, 327, and 326 ads, respectively, but we are unable to calculate their percentage increase because we lacked information about active ads from February or March. The number of active Facebook ads for Concorde reflects advertising by 13 Facebook groups for campuses around the country. In contrast, Herzing University’s 189 ads as of April 22, 2020, reflect only advertising by its online program and not the 11 Herzing campuses that had a total of 605 ads as of April 22, 2020.

Screenshots of some of the University of Phoenix’s advertisements during the first nine days of April illustrate the high volume of the school’s advertisements.
[images above: screenshots of some of the University of Phoenix advertisements published in April 2020, downloaded April 9, 2020]
Common Themes and Trends in Advertising Approaches. We identified six common advertising approaches used by the schools during the COVID-19 pandemic:

- **COVID-19 Specific** - Ads specifically referencing the COVID-19 pandemic. Many schools’ ads featured COVID-19 pandemic imagery or directly referenced the pandemic. This focus may be an effort by the schools to create a sense of “urgency” to enroll, a key finding of a U.S. Senate investigation of for-profit colleges, or to create a shared sense of sacrifice or camaraderie during the pandemic.\(^4\) Schools with ads specifically referencing the COVID-19 pandemic included American InterContinental University, American Public University, Capella University, Concorde Career College, DeVry University, Florida Career College, Fortis College, Keiser University, Lincoln Tech, Purdue University Global, Strayer University, Trident University, Ultimate Medical Academy, University of Phoenix, and Walden University.

\[\text{image above: Trident University COVID-19 advertisement, downloaded April 29, 2020}\]

Additional screenshots can be found in Appendix A.

• **Healthcare Industry Specific** - Ads featuring healthcare-specific roles and targeting prospective students interested in working in healthcare.

Many schools’ advertisements focused on the healthcare programs they offer, an apparent attempt to capitalize on the increased positive attention healthcare professionals are receiving during the pandemic. Some for-profit schools’ healthcare programs have been the subject of settlements with federal and state law enforcement agencies because the programs lacked the necessary programmatic accreditation, leaving graduates ineligible to work in their field of study.\(^5\) In addition, many for-profit healthcare programs have been criticized for charging students hefty tuition for careers that require only a high school degree.\(^6\) Schools publishing healthcare-specific advertisements include American Career College, Capella University, Colorado Technical University, Concorde Career College, DeVry University, ECPI University, Forth College, Grand Canyon University, Grantham University, Herzing University, Keiser University, Miller-Motte College, National American University, Purdue University Global, Trident University, University of Phoenix, Ultimate Medical Academy, and Walden University.

![image above: Capella University healthcare related advertisements, downloaded April 20, 2020]

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Additional screenshots can be found in Appendix B.

- **Access to Online Degree Learning Stressed** - Ads touting an institution’s online programs and referencing the benefits of online learning.

Some schools are publishing advertisements touting their online degree programs, likely a recognition of the fact that prospective students throughout the country are practicing social distancing or are struggling to access online learning from their brick and mortar college during the pandemic. Schools promoting online programs include American Career College, American InterContinental University, American Military University, Capella University, Colorado Technical University, DeVry University, ECPI University, Florida Career College, Fortis College, Full Sail University, Grand Canyon University, Grantham University, Herzing University, Keiser University, National American University, Purdue University Global, South University, Strayer University, Ultimate Medical Academy, University of Phoenix, and Walden University.
[images above from left to right: Grand Canyon University advertisement targeting high school students, downloaded May 5, 2020, DeVry University online program advertisement, downloaded April 21, 2020, Capella University online program advertisement, downloaded April 20, 2020]

Additional screenshots can be found in Appendix C.
- **Low Cost/Scholarship Promises** - *Ads promising low tuition or scholarships.*

Many schools are trying to entice students to enroll by offering reduced tuition rates and scholarships. Schools running advertisements promising affordability and scholarships include American Military University, Capella University, Colorado Technical University, Grantham University, Grand Canyon University, Herzing University, Strayer University, Trident University, and Walden University.

Whether these scholarships and discounts are real is not confirmed. Whistleblowers and student veterans have informed Veterans Education Success and the U.S. Department of Veterans Affairs that promised military scholarships and discounts at some schools are advertised as a means to attract potential students but are never actually given to students.

[images above from left to right: American Military University advertisement discussing its “Freedom Grant,” downloaded April 10, 2020, Colorado Technical University advertisement discussing its “Patriot Scholarships,” downloaded April 13, 2020]

Additional screenshots can be found in Appendix D.
Ease of Credit Transfer from Another Institution - Ads promising ease of transferring credits from another institution to complete a degree program.

Many schools are running advertisements encouraging prospective students to transfer into their degree programs from other universities. Such ads may be an attempt to capitalize on the fact that other schools are closing and/or struggling to introduce online options. Some schools running advertisements focusing on ease of credit transfer include Colorado Technical University, DeVry University, Full Sail University, Grantham University, Grand Canyon University, Herzing University, and Purdue University Global.

[images of advertisements from DeVry University, Herzing University, Purdue University Global]

Additional screenshots can be found in Appendix E.
• **Servicemembers and Veterans Targeted** - Ads explicitly targeting servicemembers in the U.S. Armed Forces and veterans.

Five schools are running advertisements that target servicemembers and veterans. It is worth noting that the majority of these ads targeted not just service members and veterans, but underserved racial minorities.

For-profit colleges are incentivized to target servicemembers and veterans for enrollment because of a loophole in the “90/10 rule,” a federal law that limits for-profit schools from receiving more than 90 percent of their revenue from Title IV federal student aid. GI Bill and active duty military tuition assistance are not listed in the statute, a loophole that for-profit colleges have abused to use veterans’ and servicemembers’ funds to offset the cap on federal funds the schools otherwise face. As a result, for every $1 of military-connected student benefits a for-profit school receives from VA or the Department of Defense, it can collect $9 more from Title IV funding. As Holly Petraeus, the former Director of Servicemember Affairs at the U.S. Consumer Financial Protection Bureau, wrote, “This gives for-profit colleges an incentive to see servicemembers as nothing more than dollar signs in uniform.”

Schools that are publishing ads targeting servicemembers and veterans include American Military University, American InterContinental University, Colorado Technical University, Herzing University, Keiser University, Purdue University Global, and Trident University.

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[images above: American Military University ads targeting servicemembers, downloaded April 10, 2020]
IV. Conclusions

Veterans Education Success identified themes and trends in advertising across the Facebook Ad Library by postsecondary institutions to understand more fully how schools were trying to reach prospective students. We found that 11 of the 27 institutions we examined had significantly increased their Facebook advertising between February and April 2020, and, for 3 of the 27, we were unable to track the increase. Furthermore, the increases we did track may understate the extent of advertising because of limitations in how ads can be tracked.

We identified six common themes in the ads aired by the schools: Ads framed around the economic uncertainty created by the COVID-19 pandemic; highlighting healthcare specific professions that have been cast in a positive light by the pandemic; touting access to flexible online instruction; promising affordability and the availability of scholarships; pointing to ease of credit transfer; or specifically targeting veterans and military-connected students. Many of the schools using these tactics were previously the subject of federal and state investigations and lawsuits for misleading advertising and recruiting and some allegedly utilize lead generation companies that may not adequately disclose to students the companies’ paid relationship to the schools they promote.

Consistent with our findings, a June 17, 2020, New York Times article noted that online for-profit schools saw an opportunity to increase enrollment because of the shutdown of campuses under a nationwide lockdown: “The colleges’ parent companies often have substantial cash reserves that
they can pump into tuition discounts and marketing at a time when public universities and nonprofit colleges are seeing their budgets disintegrate.”9 As the Times points out, “Few of the largest for-profit colleges operating primarily online have track records to justify their optimistic advertising pitches.” Nonetheless, they have seen their enrollment “surge.”

We believe that the push by these schools to use the pandemic to ramp up enrollment warrants attention by policymakers.

V. Methodology

Veterans Education Success sought to understand (1) how postsecondary institutions responded to the COVID-19 pandemic through advertising and (2) how ad copy (content and design) were structured to appeal to prospective students. To do so, we analyzed active ads on Facebook’s Ad Library (covering Facebook, Instagram, Facebook Messenger, and Facebook’s Audience Network) for a sample of 27 schools.

Sample of Postsecondary Institutions. We used several criteria to select the institutions in our sample (see Table 2). Nineteen schools were profiled in the 2012 U.S. Senate HELP Committee report, which highlighted their aggressive recruiting tactics, including use of pain-based recruiting techniques. Since 2012, 12 schools have settled lawsuits with federal and state entities for using misleading advertising and recruiting to persuade students to enroll. Twenty schools are promoted by, and allegedly pay, third party lead generators that may fail to adequately disclose to potential students the paid relationship of the schools they promote.10 Finally, the four schools in this study that are nonprofit or public had been operated for-profit but either converted to nonprofit or were sold to a public institution.

Table 2 also shows the most recent 90/10 ratios for schools—the 2017-18 revenue percentage from Title IV federal student aid and the results of a 2016 analysis by the Education Department showing a school’s total dependence on federal revenue (Title IV, VA and Defense Department) as of 2013-14. The latter is the most recent estimate of for-profit schools’ receipt of revenue from all federal sources.

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9One of the schools cited in the New York Times articles was Ashford University. On March 26, 2020, Zovio (Ashford’s parent company) announced that it plans to hire more than 200 “enrollment advisors” in the next four months. The announcement stated that “these services meet an especially critical need during this time of social distancing and self-quarantine.” The hiring of additional recruiters was also noted in an earlier article. See David Halperin, Beware: For-Profit College Scammers Will Exploit the COVID-19 Crisis, Republic Report (Mar. 29, 2020), https://www.republicreport.org/2020/beware-for-profit-college-scammers-will-exploit-the-covid-19-crisis/.

10Lead generators advertise lists of “best schools,” “how to join the military,” jobs, welfare, or other services to obtain potential students’ contact information, which is sold to schools as leads. Some lead generators may not adequately disclose to potential students the companies’ paid relationship to the schools they promote. See Veterans Education Success petitions to FTC In the Matter of QuinStreet, Inc. and Reach Network, Inc. available at https://vetsedsuccess.org/ftc-petition-lead-generators/, and In the Matter of Army.com “Partner Schools” available at https://vetsedsuccess.org/ftc-petition-army-com-and-partner-schools/.
Table 2: Characteristics of Schools in Our Sample

<table>
<thead>
<tr>
<th>Institution</th>
<th>Profiled by 2012 Senate HELP Committee&lt;sup&gt;a&lt;/sup&gt;</th>
<th>Settlement for misleading advertising and recruiting&lt;sup&gt;b&lt;/sup&gt;</th>
<th>Promoted by lead generators to recruit students&lt;sup&gt;c&lt;/sup&gt;</th>
<th>Converted to nonprofit status or purchased for-profit school</th>
<th>Revenue percentage from Title IV (2017-18)&lt;sup&gt;d&lt;/sup&gt;</th>
<th>Revenue percentage from Title IV, VA, DOD (2013-14)&lt;sup&gt;e&lt;/sup&gt;</th>
</tr>
</thead>
<tbody>
<tr>
<td>American Military University&lt;sup&gt;f&lt;/sup&gt;</td>
<td>Yes</td>
<td>Yes, 2018</td>
<td></td>
<td></td>
<td>40.8</td>
<td>93.4</td>
</tr>
<tr>
<td>American Public University&lt;sup&gt;f&lt;/sup&gt;</td>
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<td></td>
<td></td>
<td></td>
<td>40.8</td>
<td>93.4</td>
</tr>
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<td>American Career College</td>
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<td></td>
<td>Yes</td>
<td></td>
<td>71.8/76.9</td>
<td>81.8/85</td>
</tr>
<tr>
<td>American InterContinental University&lt;sup&gt;g&lt;/sup&gt;</td>
<td>Yes</td>
<td>Yes, 2013, 2017, 2019, 2019</td>
<td>Yes</td>
<td></td>
<td>89.5&lt;sup&gt;h&lt;/sup&gt;</td>
<td>96.4</td>
</tr>
<tr>
<td>Capella University</td>
<td>Yes</td>
<td></td>
<td>Yes</td>
<td></td>
<td>75.5</td>
<td>82.8</td>
</tr>
<tr>
<td>Colorado Technical University&lt;sup&gt;g&lt;/sup&gt;</td>
<td>Yes</td>
<td>Yes, 2013, 2017, 2019, 2019</td>
<td>Yes</td>
<td></td>
<td>82.5&lt;sup&gt;i&lt;/sup&gt;</td>
<td>88.7</td>
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<tr>
<td>Concorde Career College</td>
<td>Yes</td>
<td></td>
<td>Yes</td>
<td></td>
<td>68/86.9</td>
<td>75.2/88.3</td>
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<td>DeVry University&lt;sup&gt;i&lt;/sup&gt;</td>
<td>Yes</td>
<td>Yes, 2016 (2), 2017 (2)</td>
<td>Yes</td>
<td>Cogswell Education LLC purchased DeVry University in 2017</td>
<td>61</td>
<td>70.7&lt;sup&gt;j&lt;/sup&gt;</td>
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<tr>
<td>ECPI University</td>
<td>Yes</td>
<td></td>
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<td></td>
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<td>76.8</td>
</tr>
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<td></td>
<td></td>
<td>87</td>
<td>Data missing</td>
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<tr>
<td>Fortis College</td>
<td>Yes, 2014</td>
<td></td>
<td>Yes</td>
<td></td>
<td>68/85</td>
<td>82.7/94.2</td>
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<tr>
<td>Full Sail University</td>
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<td>84.1</td>
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</tr>
<tr>
<td>Grand Canyon University&lt;sup&gt;k&lt;/sup&gt;</td>
<td>Yes</td>
<td>Yes, 2015</td>
<td></td>
<td></td>
<td>71.5</td>
<td>82.1</td>
</tr>
<tr>
<td>Grantham University</td>
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<td></td>
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<td>61</td>
<td>66.8</td>
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<td>Lincoln Technical Institute</td>
<td>Yes, 2015</td>
<td></td>
<td>Yes</td>
<td>Data missing</td>
<td>78.5/89.8</td>
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</tr>
<tr>
<td>Institution</td>
<td>Converged</td>
<td>Years of Convergence</td>
<td>90/10 Rule</td>
<td>2017-18 90/10 Rule</td>
<td></td>
<td></td>
</tr>
<tr>
<td>-------------------------------------------------</td>
<td>-----------</td>
<td>-------------------------------</td>
<td>------------</td>
<td>-------------------</td>
<td></td>
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<tr>
<td>Miller-Motte College</td>
<td>Yes</td>
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<td>Data missing</td>
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<td>National American University</td>
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<td>Yes</td>
<td>82</td>
<td>96.4</td>
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<tr>
<td>South University</td>
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<td>Yes</td>
<td>Data missing</td>
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<td></td>
</tr>
<tr>
<td>Strayer University</td>
<td>Yes</td>
<td>Yes</td>
<td>76</td>
<td>90</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Trident University International</td>
<td>Yes</td>
<td>Yes</td>
<td>37.4</td>
<td>72.6</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Universal Technical Institute</td>
<td>Yes</td>
<td></td>
<td>68.3/73.5</td>
<td>81/87.9</td>
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<td></td>
</tr>
<tr>
<td>University of Phoenix</td>
<td>Yes</td>
<td>Yes</td>
<td>77.4</td>
<td>96.2</td>
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<td></td>
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<td>Walden University</td>
<td>Yes</td>
<td>Yes</td>
<td>74.7</td>
<td>77.4</td>
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<td><strong>Nonprofit</strong></td>
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<td>Herzing University</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes, 2013</td>
<td>85.3</td>
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<td>Keiser University</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes, 2012, 2015</td>
<td>2011</td>
<td></td>
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<td>Ultimate Medical Academy</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes, 2016</td>
<td>89.4</td>
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<td><strong>Public</strong></td>
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<tr>
<td>Purdue University Global</td>
<td>Yes</td>
<td>Yes</td>
<td>Purchased Kaplan University</td>
<td>73.8p</td>
<td>86.9p</td>
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<td><strong>Total</strong></td>
<td>19</td>
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<td>20</td>
<td>4</td>
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</tr>
</tbody>
</table>

Source: See table notes for data sources.

Note: The three nonprofit schools converted from for-profit to nonprofit status and one for-profit school sold all of its campuses to a public sector institution: Kaplan University, a for-profit chain, is now Purdue Global. The former for-profit owner, Kaplan Inc., has a 30-year contract to provide services to Purdue Global, including marketing, technology support, help desk functions, human resources, admissions support, financial aid administration, international student recruiting, business office functions, accounting, first-year student advising, and some test-preparation services.

aClick on this link for a list of profiled schools.
bData are from our legal brief on settlements and investigations. Click here.
cThis determination is based on an investigation by Veterans Education Success, which resulted in petitions to the Federal Trade Commission available here and here.
dData are from the Education Department’s most recent report on schools’ compliance with the 90/10 rule (academic year 2017-18). We rounded the percentages reported by the Department. For schools that reported multiple campuses separately, we report a range from lowest to highest.
Click [here](#) for a link to the dataset from a 2016 Department of Education estimate of the extent of schools’ reliance on all federal revenue—not only Title IV funds but also tuition and fee payments from GI Bill and DOD education benefits.

Both schools are owned by American Public University System and their 90/10 percentages reflect both school revenues.

American InterContinental University and Colorado Technical University are owned by Perdoceo Education Corporation, which was formerly known as Career Education Corporation. Perdoceo purchased Trident University, merging it with American InterContinental, reportedly in order to manage that school’s 90/10 compliance.

The Capitol Forum obtained American InterContinental and Colorado Technical’s 90/10 percentage for 2017 from the Education Department. On March 27, 2020, the Forum reported that the purpose of purchasing Trident was to lower American InterContinental’s score which would have exceeded 90 percent in 2017 but for deferring distribution of about $40 million in Title IV funds. Trident enrolls a significant number of individuals using the GI Bill or Defense Department Tuition Assistance, but that revenue is not included in calculating federal revenue because of the 90/10 loophole. Although the Forum did not publish Colorado Technical University’s 90/10 percentage, the author of the article shared the data with us.

The DeVry Education Group is now known as Adtalem. In 2017, it sold DeVry University to Cogswell Education LLC. In 2016, DeVry voluntarily closed the 90/10 loophole in its business practices, committing to lowering its overall dependence on federal revenue. Still, the percent listed here is understated because, based on communications with DeVry officials, the Education Department’s calculation of 90/10 compliance (based on the inclusion of all federal revenue) left out tuition and fee payments related to Post-9/11 beneficiaries.

According to former employees of Florida Career Colleges Orlando campus, the school engaged in deceptive recruiting and the school’s programs often failed to help students succeed. “According to the ex-employees, the for-profit college’s recruiters found homeless people in strip mall parking lots and lured them to campus by giving them hot dogs and tricked others into campus visits by telling them they were offering job interviews.” See David Halperin, *Ex Employees: Florida Career College Enrolled Anyone with a Pulse.*” Republic Report (May 6, 2020). [https://www.republicreport.org/2020/ex-employees-florida-career-college-enrolled-anyone-with-a-pulse/](https://www.republicreport.org/2020/ex-employees-florida-career-college-enrolled-anyone-with-a-pulse/)

Because Grand Canyon’s attempt to convert to nonprofit status was disapproved by the Education Department in 2019, we classified it as a for-profit school.

In 2017, Miller-Motte was placed on show-cause by its accreditor for poor retention rates. We have received veterans’ complaints about the school, including misrepresentation about the transferability of credits. The owners of Platt University purchased Miller-Motte in 2018. The percentage of revenue from Title IV is for three Platt College campuses, of which Miller-Motte is a branch campus.

South University was owned by the Education Management Corporation, which also settled law enforcement actions for misleading advertising by its other brands, the Art Institutes and Argosy University (not included in this count of South University’s settlements).

Ultimate Medical Academy was a for-profit school until 2015 when it was purchased by Clinical and Patient Educators Association, a nonprofit organization. The school was included in the Education Department’s 2016 analysis of 90/10 compliance based on all sources of federal revenue because the Department used 2013-14 data, which predated its sale to the nonprofit.


These 90/10 percentages reflect Kaplan’s dependence on federal revenue. Because Purdue Global is a public institution, it is exempt from the 90 percent cap on Title IV revenue.
Facebook Ads. Veterans Education Success examined the ads of these 27 schools across Facebook’s Ad Library (which covers all of Facebook’s platforms – including Facebook, Instagram, and Facebook’s Audience Network). Facebook has the largest user base of all social media platforms, with 2.5 billion monthly active users as of December 2019. With the rise of social distancing in the wake of the pandemic, Facebook’s average daily traffic has increased dramatically.

Ads were collected via screenshot, and the date they were captured was annotated. We then analyzed the ads to identify trends and themes across these schools by developing a preliminary list of codes to describe advertising strategy and placement. We organized our findings into six distinct themes.

It is important to note that the ads we captured likely understate the actual volume of school advertisements, which did not include ads that were no longer active. In addition, the number of active ads fluctuated from day to day and reflect only those active on the day we accessed the Facebook Ad Library.

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11 Facebook’s Audience Network is an off-Facebook, in-app advertising network for mobile apps. Advertisers can use Facebook’s ad system beyond Facebook’s platforms to reach customers who are using mobile sites and apps. [https://www.facebook.com/audiencenetwork](https://www.facebook.com/audiencenetwork).

Appendix A

*COVID-19 Specific Ads*

Additional examples of COVID-19 specific advertisements are depicted below.

[images above from left to right: Capella University “Uncertain Times” advertisement, downloaded April 20, 2020, Concorde Career College “Health Care Heroes” advertisement, downloaded April 20, 2020]

[images above from left to right: DeVry University homeschooling advertisement, downloaded April 21, 2020, Fortis College advertisement explicitly mentioning COVID-19, downloaded April 21]
[images above from left to right: Keiser University “Health Care Heroes” advertisement, downloaded April 27, 2020, Strayer University “Stay Safe. Stay Home” advertisement, downloaded April 29, 2020]
[images above from left to right: Trident University COVID-19 advertisement, downloaded April 29, 2020, Walden University COVID-19 advertisement, downloaded April 29, 2020]
[images above from left to right: Lincoln Tech “Essential Job” advertisement, downloaded April 29, 2020, Florida Career College “Train for an Essential Career” advertisement, downloaded April 29, 2020.]

[images above from left to right: Ultimate Medical Academy COVID-19 advertisement, downloaded April 29, 2020, University of Phoenix COVID-19 related advertisement, downloaded April 30, 2020.]
[images above from left to right: American Public University advertisement, downloaded April 10, 2020, American InterContinental University “Toughest Moments” advertisement, downloaded April 13, 2020]
Appendix B

*Healthcare Industry Specific*

Additional examples of healthcare industry specific advertisements are depicted below.

[Image above: Capella University healthcare related advertisements, downloaded April 20, 2020]
[image above: Concorde Career College healthcare related advertisements, downloaded April 20, 2020]

[Image 139x491 to 473x720]
[Image 108x184 to 299x442]
[Image 363x184 to 504x435]

[Image above from left to right: ECPI University healthcare related advertisement, downloaded April 21, 2020, Fortis College healthcare related advertisement, downloaded April 21, 2020]
[images above from left to right: Herzing University healthcare related advertisement, downloaded April 22, 2020, University of Phoenix healthcare related advertisement, downloaded April 30, 2020]

[images above from left to right: Grand Canyon University healthcare related advertisement, downloaded May 5, 2020, DeVry University healthcare related advertisement, downloaded April 21, 2020]
[image above: Colorado Technical University healthcare related advertisements, downloaded April 13, 2020]

[images above from left to right: Grantham University healthcare related advertisement downloaded April 22, 2020, Purdue University Global healthcare related advertisement, downloaded April 27, 2020]
[image above: Keiser University healthcare related advertisement, downloaded April 27, 2020, National American University healthcare related advertisement, downloaded April 27, 2020]

[Image 141x473 to 507x720]
[Image 72x204 to 565x425]

[Image above: Miller-Motte College healthcare related advertisements, downloaded April 27, 2020]
[image above: Trident University healthcare related advertisement, downloaded April 29, 2020, Walden University healthcare related advertisement, downloaded April 29, 2020]

[image above: American Career College healthcare related advertisements, downloaded April 29, 2020]
[image above: Ultimate Medical Academy healthcare related advertisements, downloaded April 29, 2020]
Appendix C

**Access to Online Learning**

Additional examples of advertisements touting schools’ online degree programs are depicted below.

[images above from left to right: Grand Canyon University advertisement targeting high school students, downloaded May 5, 2020, DeVry University online program advertisement, downloaded April 21, 2020, Capella University online program advertisement, downloaded April 20, 2020, ECPI University online program advertisement, downloaded April 21, 2020]
[images above from left to right: Fortis College online program advertisement, downloaded April 21, 2020, Grantham University online program advertisement, downloaded April 22, 2020]

[images above from left to right: Herzing University online program advertisement, downloaded April 22, 2020, Purdue University Global online program advertisement, downloaded April 27, 2020]
[images above from left to right: Keiser University online program advertisement, downloaded April 27, 2020, National American University online program advertisement, downloaded April 27, 2020]

[images above from left to right: South University online program advertisement, downloaded April 27, 2020, Strayer University online program advertisement, downloaded April 29, 2020]
[images above from left to right: Walden University online program advertisement, downloaded April 29, 2020, American Career College online program advertisement, downloaded April 29, 2020]

[images above from left to right: Florida Career College online program advertisement, downloaded April 29, 2020, Ultimate Medical Academy online program advertisement, downloaded April 29, 2020]
[images above from left to right: University of Phoenix online program advertisement, downloaded April 30, 2020, American Military University online program advertisement, downloaded April 10, 2020]

[images above from left to right: Full Sail University online program advertisement, downloaded April 10, 2020, American InterContinental University online program advertisement, downloaded April 13, 2020]
Colorado Technical University

U.S. News and World Report ranked several CTU programs among its lists for Best Online Programs for 2019.

Learn more about CTU.
HTTPS://ONLINE.COLORADOTECH.EDU

See Ad Details

[image above: Colorado Technical University online program advertisement, downloaded April 13, 2020]
Appendix D

Low Cost/Scholarships Promised

Additional examples of advertisements that promise low cost and scholarships are depicted below.

[images above from left to right: Capella University “FLEXPATH” advertisement, downloaded April 20, 2020, Grantham University advertisement touting low tuition rates, downloaded April 22, 2020]
[images above from left to right: Grand Canyon University advertisement discussing scholarships, downloaded May 5, 2020, Herzing University advertisement discussing enrollment fee waiver, downloaded April 22, 2020]

[image above: Strayer University advertisement discussing the “Strayer Graduation Fund,” downloaded April 29, 2020]
[images above from left to right: Trident University advertisement claiming that qualified students can receive up to “67% off” degrees, downloaded April 29, 2020, Walden University advertisement discussing scholarships, grants, and financial aid, downloaded April 29, 2020]

Appendix E

Ease of Credit Transfer

Additional examples of advertisements featuring credit transfers are depicted below.

[images above from left to right: DeVry University transfer advertisement, downloaded April 21, 2020, Grantham University transfer advertisement, downloaded April 22, 2020]

[images above from left to right: Herzing University transfer advertisement, downloaded April 22, 2020, Purdue University Global transfer advertisement, downloaded April 27, 2020]
[images above from left to right: Grand Canyon University transfer advertisements, downloaded April 10, 2020, Full Sail University transfer advertisement, downloaded April 10, 2020]

[image above: Colorado Technical University transfer advertisement, downloaded April 13, 2020]
Appendix F

Targeting Servicemembers

Additional examples of advertisements targeting servicemembers and veterans are depicted below.

[images above: American Military University ads targeting servicemembers, downloaded April 10, 2020]
[images above: American InterContinental University ads targeting servicemembers, downloaded April 13, 2020. “MOS” is a military acronym for Military Occupational Specialty, which is used by some of the military services]
[images above: Colorado Technical University ads targeting servicemembers, downloaded April 13, 2020]
After serving in the military, Yanna Loch earned his technology management degree with Herzing University. "Employers were seeking me," he says.

[images above from left to right: Herzing University ad targeting servicemembers, downloaded April 22, 2020, Purdue University Global ad targeting servicemembers, downloaded April 27, 2020]
[image above: Keiser University ad discussing its Ft. Myers campus, downloaded April 27, 2020]
images above: Trident University ads targeting servicemembers, downloaded April 29, 2020]
[images above: Trident University ads targeting servicemembers, downloaded April 29, 2020]