



**VETERANS**  
EDUCATION SUCCESS

# INVESTIGATIVE ANALYSIS

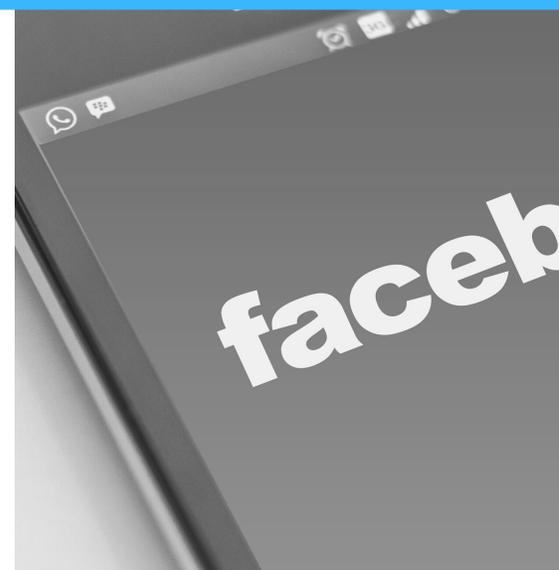
**Advertising Trends for Selected  
Postsecondary Institutions during the  
COVID-19 Pandemic**

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ALEX KISH  
ATTORNEY

WALTER OCHINKO  
RESEARCH DIRECTOR



## ***Highlights***

Our investigation examined how a sample of 27 primarily for-profit postsecondary institutions were responding to the COVID-19 pandemic, including the nature of their advertising, and whether their ads were targeting veterans and military-connected students. We analyzed the schools' active social media ads appearing between February and April 2020 on the Facebook Ad Library, which encompasses Facebook, Instagram, Facebook Messenger, and Facebook's Audience Network.<sup>1</sup>

We identified six common advertising approaches used by the 27 schools:

- Ads referenced, or appeared to reference, 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 featured healthcare-specific roles and appeared to target prospective students interested in working in healthcare;
- Ads touted an institution's online programs and referencing the benefits of online learning;
- Ads promised low cost or scholarships;
- Ads referenced the ease of transferring credits from another institution; and
- Ads appeared to target 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 also appeared to target underserved minorities.

## ***Background***

In February 2020, the U.S. economy officially entered a recession prompted by the COVID-19 pandemic and stay-at-home orders, with unemployment numbers higher than those of the Great Recession that began in December 2007.<sup>2,3</sup> During that recession, postsecondary enrollment increased, particularly at for-profit schools.<sup>4</sup> (See our [report](#) on the counter cyclical relationship between recessions and college enrollment.)

A May 2020 Brookings Institution [report](#) using 2017 data on college advertising found that “Degree-granting for-profit institutions account for about 40% of all higher education advertising spending, while serving just 6% of students. Among the institutions that advertise, for-profit institutions spend almost \$400 on advertising per student, compared to just \$48 per student among nonprofits and \$14 per student among public institutions.”

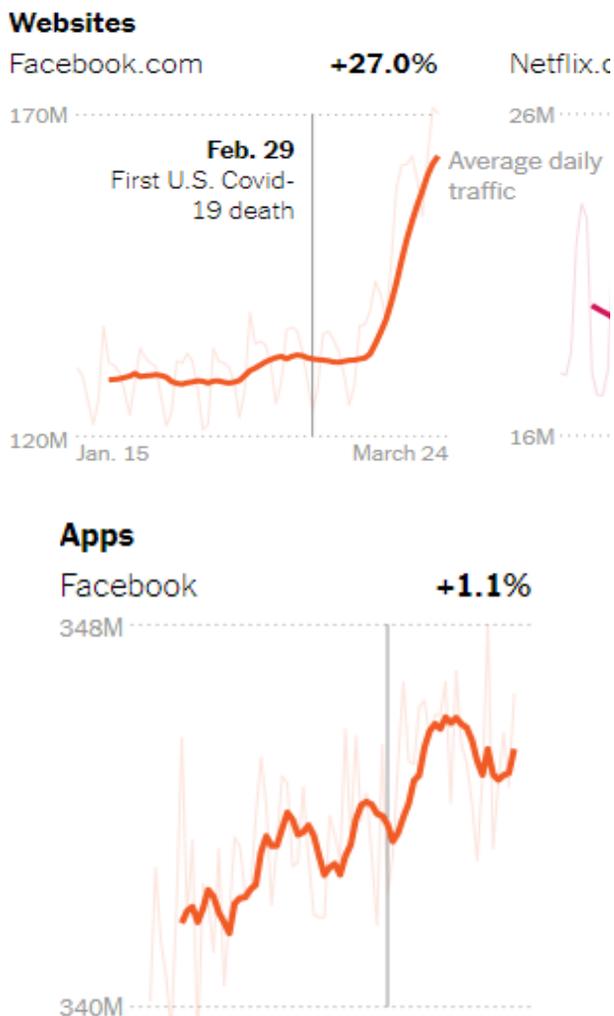
Our interest in postsecondary advertising in response to COVID-19 was sparked by an observed increase in social media advertising by schools, some of which have a history of predatory or aggressive marketing and recruiting. The 27 schools whose advertising we examined met one or more of the following 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 (see methodology).

## ***Evidence of Increased Advertising***

With the rise of social distancing in the wake of the pandemic, Facebook's average daily traffic



has increased dramatically (see “Websites” graphic).<sup>5</sup> There has also been an increase in the number of people using the Facebook app on their smartphones (see “Apps graphic”). Facebook has the largest user base of all social media platforms, with 2.5 billion monthly active users as of December 2019.



[images above: New York Times graphs showing increased Facebook traffic during the COVID-19 pandemic, downloaded April 30, 2020]

The ramp-up in recruiting activities by for-profit, public, and nonprofit institutions in response to COVID-19 has been well documented.

Kivvit, a company that designs and manages advertising campaigns for clients, analyzed the Facebook advertising of 416 U.S. higher education institutions between March 12 and May 19, 2020. The goal was to understand how postsecondary institutions were adapting their marketing in the age of COVID-19. Compared to the same period 1 year ago, Kivvit [found](#) that higher education advertising increased by 7 percent during the pandemic. According to the report, “private and for-profit online entities were among the largest education advertisers and drove the increase in spending, seeking to capitalize on the uncertainty that currently surrounds on-campus learning.” The top 10 institutions by ad spending were Western Governors University, Purdue, University of Pittsburgh System, Strayer, University of Phoenix, Massachusetts Institute of Technology, University of Florida, The Regents of the University of California, Walden University, and Chamberlin College of Nursing.<sup>6</sup> Four of the top 10 institutions were for-profit schools and Purdue, a public college, had purchased for-profit Kaplan College in 2018 and rebranded it “Purdue Global.” Kaplan has a 30-year [contract](#) to provide services to Purdue, including marketing.

The Chief Executive of for-profit American Public Education Inc., [told New York Times](#) reporters that “The pandemic has created an unexpected opportunity.” She informed investors that the company had started spending part of its marketing budget originally earmarked for later this year. In late March 2020, the owners of Ashford University [announced](#) that it planned 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.” One online [reviewer](#) of the role of Ashford’s “admissions counselor” stated that the position is essentially a highly regulated and monitored sales job: “I am not a high enroller, but I retain students. That is because I only enroll people who WANT and NEED to go to school and are ready to take it on. I don't feel comfortable selling and pushing people into it. Because of that, I am generally treated poorly by my manager and director.” Numerous other reviewers expressed similar views.

### ***Advertising Behaviors Changed After COVID-19 Was Declared a Pandemic***

We identified six common advertising approaches used by our sample of 27 schools during the COVID-19 pandemic. Screenshots of some of the ads we reviewed can be found at [Appendix A at this link](#). In addition to ads organized by the six common approaches, [Appendix A](#) includes an example of a school with a large volume of ads, which helped to prompt our research.<sup>7</sup>

### ***COVID-19 Specific - Ads referencing the COVID-19 pandemic.***

Many ads of the schools we studied appeared to feature 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 the U.S. Senate investigation of for-profit colleges, or to create a shared sense of sacrifice or camaraderie during the pandemic.<sup>8</sup>

Schools with ads that appeared to reference, or specifically reference, 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.

### ***Healthcare Industry Specific - Ads featuring healthcare-specific roles and appearing to target prospective students interested in working in healthcare.***

Many advertisements by the schools we analyzed 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.<sup>9</sup> In addition, many for-profit healthcare programs have been criticized for charging students hefty tuition for careers that require only a high school diploma.<sup>10</sup>

Schools publishing healthcare-specific advertisements include American Career College, Capella University, Colorado Technical University, Concorde Career College, DeVry University, ECPI University, Fortis 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.

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

Some schools we studied published 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.

**Low Cost/Scholarship Promises - Ads promising low tuition or scholarships.**

Many schools we studied appear to be trying to entice students to enroll by offering reduced tuition rates and scholarships. 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.

Schools that ran 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.

- **Ease of Credit Transfer from Another Institution - Ads promising ease of**

*transferring credits from another institution to complete a degree program.*

Many schools we studied ran 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.

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.

**Servicemembers and Veterans Targeted - Ads that appear to target servicemembers in the U.S. Armed Forces and veterans.**

Six schools we studied ran advertisements that appear to target servicemembers and veterans. It is worth noting that the majority of these ads appear to target 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.<sup>11</sup> 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.”<sup>12</sup>

Schools that published ads that appear to target servicemembers and veterans include American Military University, American InterContinental University, Colorado Technical University, Herzing University, Purdue University Global, and Trident University.

### **Conclusions**

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.” 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 apparent push by schools that may have a history of predatory and aggressive recruiting to use the pandemic to ramp up enrollment warrants attention by policymakers.

### **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 1). Nineteen schools were profiled in the 2012 U.S. Senate investigation, which highlighted their aggressive recruiting tactics, including use of pain-based recruiting techniques. Twelve schools have settled lawsuits with federal and state entities since 2012 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.<sup>13</sup> 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 1 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.

*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).<sup>14</sup>

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.

**Table 1: Characteristics of Schools in Our Sample**

Institution	Profiled by 2012 Senate HELP Committee <sup>a</sup>	Settlement for misleading advertising and recruiting <sup>b</sup>	Promoted by lead generators to recruit students <sup>c</sup>	Converted to nonprofit status or purchased for-profit school	90/10 ratios	
					Revenue percentage from Title IV (2017-18) <sup>d</sup>	Revenue percentage from Title IV, VA, DOD (2013-14) <sup>e</sup>
<b>For Profit</b>						
American Military University <sup>f</sup>	Yes	Yes, <a href="#">2018</a>			40.8	93.4
American Public University <sup>f</sup>	Yes				40.8	93.4
American Career College	Yes		Yes		71.8/76.9	81.8/85
American InterContinental University <sup>g</sup>	Yes	<a href="#">Yes</a> , 2013, 2017, 2019, 2019	Yes		89.5 <sup>h</sup>	96.4
Capella University	Yes		Yes		75.5	82.8
Colorado Technical University <sup>g</sup>	Yes	<a href="#">Yes</a> , 2013, 2017, 2019, 2019	Yes		82.5 <sup>i</sup>	88.7
Concorde Career College	Yes		Yes		68/86.9	75.2/88.3
DeVry University <sup>i</sup>	Yes	<a href="#">Yes</a> , 2016 (2), 2017 (2)	Yes	Cogswell Education LLC purchased DeVry University in 2017	61	70.7 <sup>j</sup>
ECPI University	Yes		Yes		66	76.8
Florida Career College <sup>j</sup>					87	Data missing
Fortis College		<a href="#">Yes</a> , 2014	Yes		68/85	82.7/94.2
Full Sail University			Yes		Data missing	84.1
Grand Canyon University <sup>k</sup>	Yes	<a href="#">Yes</a> , 2015	Yes		71.5	82.1
Grantham University			Yes		61	66.8
Lincoln Technical Institute		<a href="#">Yes</a> , 2015	Yes		Data missing	78.5/89.8
Miller-Motte College <sup>l</sup>					48/78 <sup>l</sup>	96.9
National American University	Yes				82	96.4
South University	Yes	<a href="#">Yes</a> , 2015 (2) <sup>m</sup>			Data missing	87.9



Strayer University	Yes		Yes		76	90
Trident University International <sup>g</sup>	Yes		Yes		37.4	72.6
Universal Technical Institute	Yes				68.3/73.5	81/87.9
University of Phoenix	Yes	<a href="#">Yes</a> , 2004, 2009, 2019	Yes		77.4	96.2
Walden University	Yes		Yes		74.7	77.4
<b>Nonprofit</b>						
Herzing University	Yes	<a href="#">Yes</a> , 2013	Yes	Yes, <a href="#">2015</a>		85.3
Keiser University	Yes	<a href="#">Yes</a> , 2012, 2015	Yes	Yes, <a href="#">2011</a>		
Ultimate Medical Academy <sup>a</sup>			Yes	Yes, <a href="#">2016</a>		89.4
<b>Public</b>						
Purdue University Global <sup>o</sup>		<a href="#">Yes</a> , 2012, 2014, 2015 (2) (settlements with Kaplan prior to sale to Purdue)	Yes	Purchased Kaplan University	73.8 <sup>p</sup>	86.9 <sup>p</sup>
<b>Total</b>	19	12	20	4		

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.

<sup>a</sup>Click on this [link](#) for a list of profiled schools.

<sup>b</sup>Data are from our legal brief on settlements and investigations. Click [here](#).

<sup>c</sup>This determination is based on an investigation by Veterans Education Success, which resulted in petitions to the Federal Trade Commission available [here](#) and [here](#).

<sup>d</sup>Data 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.

<sup>e</sup>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.

<sup>f</sup>Both schools are owned by [American Public University System](#) and their 90/10 percentages reflect both school revenues.

<sup>g</sup>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.

<sup>h</sup>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.

<sup>i</sup>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.

<sup>j</sup>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/>

<sup>k</sup>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.

<sup>l</sup>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.

<sup>m</sup>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).

<sup>n</sup>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.

<sup>o</sup>In 2017, Kaplan Inc., sold its portfolio of schools to Purdue University, a public institution, which rebranded them as Purdue University Global. Kaplan has a 30-year [contract](#) to provide services, including marketing. Mark Lieberman, *Purdue’s Online Strategy, Beyond ‘Global’*, Inside Higher Ed (Jan. 9, 2020), <https://www.insidehighered.com/digital-learning/article/2019/01/09/purdue-prepares-online-expansion-support-newly-acquired-profit>.

<sup>p</sup>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.

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<sup>1</sup>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. As a result, we did not observe all ads published by our sample of schools, only those which were active on the days we accessed the ad library.

<sup>2</sup>[National Bureau of Economic Research](#).

<sup>3</sup>Pew Research Center, *Unemployment rose higher in three months of COVID-19 than it did in two years of the Great Recession* (Jun. 11, 2020), <https://www.pewresearch.org/fact-tank/2020/06/11/unemployment-rose-higher-in-three-months-of-covid-19-than-it-did-in-two-years-of-the-great-recession/>

<sup>4</sup>The U.S. Senate Health, Education, Labor, and Pensions Committee’s 2012 investigation of for-profit schools [found](#) that the 30 institutions profiled spent 23 percent of their revenue on marketing and recruiting.

<sup>5</sup>Ella Koeze, et al., *The Virus Changed the Way We Internet*, New York Times (April 7, 2020), <https://www.nytimes.com/interactive/2020/04/07/technology/coronavirus-internet-use.html>; Jon Swartz, *Facebook is experiencing record usage, but will advertisers spend during spread of coronavirus?*, MarketWatch (April 24, 2020), <https://www.marketwatch.com/story/facebook-in-the-age-of-covid-19-users-are-online-but-will-advertisers-pay-to-get-to-them-2020-04-06>.

<sup>6</sup>Chamberlin College of Nursing is owned by for-profit DeVry Education Group (now Adtalem).

<sup>7</sup>We found that 11 of the 27 schools we examined purchased a large volume of active Facebook ads with increases ranging from 147 percent up to 14,600 percent over a 3-month period. Some schools, however, disputed our counts. Although we captured hundreds of screenshots of schools’ ads, we did not make a screen shot of each of the 2,344 active ads purchased by the 11 schools. We remain confident in our count of the 11 schools with an increase in ads. Nevertheless, because Facebook does not retain a record of active ads, we cannot document our counts and therefore are not reporting these findings.



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<sup>8</sup>See U.S. 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), [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>9</sup>In 2013, Career Education Corporation [settled](#) with the New York Attorney General’s office for lack of programmatic accreditation for certain programs as well as for misrepresenting job placement rates. See generally U.S. 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) (section on “programmatic accreditation”), [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>10</sup>Morgan, Julie Margetta and Ellen-Marie Whelan (2011). *Profiting from Health Care: The Role of For-Profit Schools in Training the Health Care Workforce*. Washington, D.C.: Center for American Progress, <https://www.americanprogress.org/issues/healthcare/reports/2011/01/20/8945/profitting-from-health-care/>.

<sup>11</sup>20 USC 1094(a)(24); *90/10 Rule*, FinAid, <http://www.finaid.org/loans/90-10-rule.phtml> (last visited June 12, 2020); Veterans Education Success, *90/10 Loophole*, <https://vetsedsuccess.org/what-we-do/policy-advocacy/our-work-with-the-executive-branch/education/90-10-loophole/>; Michael Stratford, *New Fodder for 90/10 Debate*, Inside Higher Ed (Oct. 13, 2014), <https://www.insidehighered.com/news/2014/10/13/more-profit-colleges-would-fail-9010-rule-if-veterans-benefits-are-included-analysis>; see also, Michael Durkheimer, *The Loophole That Helps Schools but Hurts Veterans and Taxpayers*, Forbes (Nov. 29, 2017), <https://www.forbes.com/sites/michaeldurkheimer/2017/11/29/the-loophole-that-helps-schools-but-hurts-veterans-and-taxpayers/#7abb876f5c6a>.

<sup>12</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>.

<sup>13</sup>Lead 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/>.

<sup>14</sup>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>.

