



June 23, 2020

Mr. F. Willis Caruso, Jr., Interim President and CEO
Mr. John Lorenz, Chief Financial Officer
Ms. Barbara Bickett, Chief Financial Aid Director

Cogswell Education LLC
DeVry University
1200 East Diehl Road
Naperville, IL 60563

Dear School Officials:

Under 34 CFR §§ 685.206 and 685.222, borrowers of federal student loans may apply for a discharge of some or all of their federal student loans based on certain types alleged misconduct by their (or their children's) school. We currently have several thousand borrower defense applications that make allegations regarding DeVry University and that will require a fact-finding process pursuant to 34 CFR § 685.222(e)(3)(i).

For each such application, we will email a separate notification (the "School Notice Email") and a password-protected copy of the borrower's application to the President, Chief Financial Officer, and Financial Aid Officer of record for your school. You and the other officials will receive the same School Notice Email and attachment. We will send password information in a separate email. The School Notice Email will also provide your school an opportunity to submit responses to borrower defense applications, either individually or collectively, with instructions for how to do so.

Note: Given the large volume of email notifications you are about to receive, you may want to set up a rule within your email client to place the emails in a location other than your inbox. The School Notice Emails will be sent from borrowerdefense@ed.gov.

After preliminary review of the borrower defense applications, we have some general requests that will assist us in evaluating those applications. Borrowers who have filed applications against your school allege misrepresentations concerning job prospects, transferability of credits, program cost, and other types of claims.

To facilitate the fact-finding process for these borrower claims, we request that you send us documents as described below. For each category of document, please provide responsive documents from 2008 to 2015.

- Copies of any civil investigative demands served on your institution along with an inventory of the records produced in response to the civil investigative demand. In particular, we would like to see the civil investigative demand served by the U.S. Department of Justice in 2019.

Federal Student Aid
An OFFICE of the U.S. DEPARTMENT of EDUCATION

830 First Street, NE, Washington, DC 20202
StudentAid.gov

- Copies of any accreditor or auditor reviews or reports regarding:
 - a) Job placement rates, including methodologies used to calculate the rates, for the years 2008-2015;
 - b) Advertisements focused on job placement rates; and
 - c) Job prospects for graduates of DeVry.
- Any and all annual employment rate disclosures and methodologies used to calculate the disclosures made to any accreditor, state agency, governmental agency or other entity, for any and all years available, but specifically the years 2008-2015.
- For each advertisement used to solicit prospective students, that was placed in any advertising medium, documents sufficient to identify the name of the advertising medium and all dates and times and locations each advertisement ran in the United States.

Please note that your responses and any evidence are due within 30 days of your receipt of the School Notice Email for each borrower defense application. Please contact us at BDSchoolEvidence@ed.gov to arrange for the transmittal of your responses and documents. Include the name of your school in the subject of the email and provide a description of the materials that your school plans to submit and the estimated byte size in the body of the email. We will assess and advise how to transmit the materials to us.

As part of our initial fact-finding process, we may reach out to you in the future with follow-up questions. For additional information regarding the borrower defense to loan repayment process and applicable regulations, visit us at StudentAid.gov/borrower-defense.

If you have questions about this communication, email us at BDSchoolEvidence@ed.gov.

Sincerely,

U.S. Department of Education
Office of Federal Student Aid
Borrower Defense Unit