



January 20, 2022

Dr. Herman Bounds  
Director  
Accreditation Group, Office of Postsecondary Education  
U.S. Department of Education  
400 Maryland Avenue, SW  
Washington, DC 20202

**RE: Call for Comments 86 FR 71251, Document Number 2021-27095**

**Submitted Electronically**

Dear Dr. Bounds,

On behalf of Veterans Education Success, I am pleased to submit comments in response to your office's notice of December 15, 2021 referenced above, in which you solicit information regarding continued Secretarial recognition of the Middle States Commission on Higher Education (MSACHE) as a reliable authority on the quality of education offered by institutions of higher education for purposes of the Higher Education Act of 1965, as amended (HEA), and for other federal purposes.

Veterans Education Success is a nonprofit research, policy, and student-veteran advocacy organization. We work on a bipartisan basis to advance higher education success for veterans, service members, and military families, and to protect the integrity and promise of the GI Bill® and other federal postsecondary education programs. Our advocacy work includes assisting veterans and military-connected students when they encounter unfair, deceptive, or abusive acts or practices by institutions of higher education.

Whether they are financing their education with their GI Bill® benefits, the Department of Defense's Tuition Assistance program, or federal student aid dollars, student veterans and military-connected students rely on the Department of Education's gatekeeping system, "the triad," to protect them against waste, fraud, and abuse by subpar or unscrupulous institutions. Within the triad, Secretariially recognized accreditation plays the only substantive role in assuring the quality of the education that students receive.

We write to bring to your attention one school accredited by MSACHE that we believe warrants additional attention and we ask that you inquire into whether MSACHE is sufficiently protecting students at this school.

## **Statistical Information**

Institutions accredited by MSACHE offer 5,718 programs, 706 of which produced graduates the majority of whom earn less than high school graduates with no college coursework.<sup>1</sup> Institutions offering these 706 programs warrant more serious review and attention than MSACHE is currently applying.

## **Problems at Bryant & Stratton College**

### **Student Complaints:**

Two students filed complaints against Bryant & Stratton University with Veterans Education Success. One student expressed concern about unexpected student loans, a balance due to the school, and an inability to reach anyone at the school to communicate about those concerns. In addition, a second student, Nicole Wilson, testified before the Department of Education about her experience at Bryant & Stratton. She reported that the school promised she could become a nurse in two years and promised the schedule was flexible for working students, but in reality, the school offered no flexibility, and the program was of extremely poor quality and took longer than two years to complete. The students had to participate in clinicals two hours away from the school because local hospitals did not believe they were adequately instructed. Teachers were assigned to classes for which they were not qualified, driving away the best instructors. Bryant & Stratton did not accept Nicole's previous nursing credits, and her current community college accepted the transfer of only one course from Bryant & Stratton because the courses at Bryant & Stratton did not meet the standards of the nursing board.

### **Whistleblower:**

Employee A worked at Bryant & Stratton as a course developer for the online program. One of his tasks was to create alternative texts for graphics so that someone who could not see the graphics would know what was going on in the images. While working on an accounting course, a dean told him to write an "accounting equation" for a graphic showing a sheet of account balances, credits, debits, liabilities, and the like. He pushed back, as he knew that an "accounting equation" would not be sufficient to provide educational content to students who needed the alternative text. Similar instances like that occurred, and that Employee A brought his concerns to his direct supervisors, the program manager, and the dean of online instruction, but no one instructed him to provide the proper detailed, rich alternative texts for graphics.

The employee also had concerns that Bryant & Stratton Online had a call center that they used to recruit students. He heard the school's recruiters target disadvantaged students, women, and minorities. Employee A believed that there may have been personal incentives such as time off or extra lunches for

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<sup>1</sup> This analysis uses Third Way's Price-to-Earnings Premium for college programs across the US. Institutions that were missing net price or earnings data were excluded. College programs defined as providing no economic ROI means that the majority of graduates were shown to earn less than a typical high school graduate within the state where the institution was located two years after graduation. <https://www.thirdway.org/report/which-college-programs-give-students-the-best-bang-for-their-buck>

high performing recruiters. A friend of Employee A who worked in the call center felt that the practices bordered on harassment.

In sum, Employee A believed that there was a “nonchalant attitude toward student success” at the school.

### **Poor student outcomes:**

Compared to a local community college in Buffalo, NY (Erie Community College), Bryant & Stratton student outcomes are remarkably poor:

- Bryant & Stratton costs twice as much in terms of average annual cost, as published on the College Scorecard:
  - Erie Community College (ECC) - \$5,131/yr
  - B&S (Buffalo) - \$12,880
  - B&S (online) - \$13,780/yr
- Bryant & Stratton’s on-ground campus spends half of the revenue that ECC does on instruction and its online campus spends far less than that, as published in the IPEDS records:
  - ECC - \$8,120 per FTE enrollment, by function: Fiscal year 2020)
  - B&S (Buffalo) - \$4,235 per FTE enrollment, by function: Fiscal year 2020
  - B&S (online) - \$732 per FTE enrollment, by function: Fiscal year 2020
- Bryant & Stratton graduates owe significantly more in students loans, as published on the College Scorecard:
  - ECC - \$4,902 - \$14,000
  - B&S - \$11,400 - \$51,442
  - University at Buffalo - \$16,625 - \$26,000
- Despite the fact that it costs significantly more to attend, Bryant & Stratton students earn less in the second year after graduation, as published on the College Scorecard:
  - ECC - \$18,087 - \$64,245
  - B&S (Buffalo and online campus) - \$17,859 - \$57,963

Bryant & Stratton also has a poor track record in other metrics published on the College Scorecard or in other federal databases:

- Bryant & Stratton’s recent cohort default rate is 19.6%, which is almost double the national average of 10.1% and far above the New York State average of 8.6%.
- Bryant & Stratton’s Buffalo campus puts 57% of students in debt, and only 6% are making progress on their loans 2 years after entering repayment.
- Only 18% of students graduate within 8 years of entering for the first time at the online campus.
- Bryant & Stratton had a 90-10 federal Title IV funding percentage of 83.96% in the 2017-2018 reporting period and 85.08% in the 2018-2019 reporting period. It is unclear whether it would be able to stay below 90% when GI Bill and other non-Title IV federal money are included as federal funds.

**Transition to non-profit status:**

It is unclear what, if any, protections that MSACHE demanded be put in place when it approved Bryant & Stratton's proposed conversion to a non-profit entity. The conversion should have been especially scrutinized because the family that owned the school [transferred](#) it to a non-profit entity that was solely owned by the same family's charitable foundation. Although MSACHE [requested](#) a supplemental information report addressing the financial impact of the long term lease agreements on the surviving institution, that report does not appear to have been made public and it is unclear what steps were taken in light of that report. Because Bryant & Stratton was so close to failing the 90-10 limitations, it is troubling that the transition to non-profit status allows it to escape this important test of quality, especially if MSACHE did not appear to take any steps to determine whether Bryant & Stratton was improving its programs and outcomes.

In summary, we ask that you examine MSACHE's accreditation practices to determine whether it is adequately reviewing the schools it accredits and protecting students that attend institutions with complaints, whistleblower reports, low student outcomes, and questionable changes of ownership.

We appreciate your attention and look forward to your recommendation to NACIQI.

Sincerely,

A handwritten signature in black ink, appearing to read 'B Nassirian', with a stylized flourish at the end.

Barmak Nassirian  
Vice President for Higher Education Policy