Good morning. I am Allison Muth, and I am a Senior Attorney with Veterans Education Success. 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 education programs.

My primary role is to assist veterans and military-connected students who reach out to our organization after experiencing unfair, deceptive, or abusive acts by their school.

Student veterans and military-connected students rely on accreditors to protect them against waste, fraud, and abuse by subpar or unscrupulous institutions. The Higher Learning Commission accredits the schools about which we have received the most complaints, and we have concerns about how well HLC is upholding its duties as guardians of student and taxpayer interests.

We have received almost 2,000 complaints from veterans and military-connected students about HLC-accredited schools, especially University of Phoenix, Perdoceo schools, DeVry, Walden, and Grand Canyon. Veterans tell us these schools lied to them about key facts during recruitment, took out loans against their wishes or without their knowledge, added extra costs, provided inadequate education, and left them unable to get a job after graduation.

The sheer volume of complaints that we have received, from only one subsection of the student population, suggests a failure by HLC to perform its critical role in ensuring adequate educational quality.

We urge you to consult with FSA attorneys about whistleblowers who have come forward about HLC-accredited schools, including DeVry and Colorado Tech, alleging that the schools engage in illegal practices and have a serious record of making misrepresentations to students. A USA Today report profiled one of these whistleblowers.

Moreover, as you know, state and federal law enforcement agencies have taken action against several HLC-accredited schools in the last few years, including the FTC against University of Phoenix and DeVry, and 49 attorneys general against Career Education Corporation, now known as Perdoceo. Behind these actions are real people whose financial lives are being ruined and veterans who are cheated out of their hard-earned GI Bill benefits.

We are concerned by the fact that these schools, to our knowledge, have remained accredited without sanctions from HLC in the last five years.
We ask you to ensure that HLC is enforcing adequate standards that lead to action against schools with records of institutional abuses. Otherwise, we believe that neither the Department of Education nor the public can rely on HLC to accredit institutions of higher education.

Thank you for the opportunity to comment.