

Good afternoon. As some of you know, 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.

Accreditors must take seriously news reports, lawsuits, and allegations of wrongdoing and subpar education by schools they accredit. WASC must act on its responsibility to investigate schools it accredits and to withdraw accreditation from noncompliant schools.

WASC accredits at least 11 law schools in California that are not recognized by the American Bar Association. Students at these schools are generally not eligible to sit for the bar exam outside of California, and their California bar passage rates are abysmal. One WASC-approved school had a pass rate of 7%. WASC even accredited two of these schools *after* they lost ABA accreditation. There are concerns that there is no real teaching at these law schools, and whistleblowers share that some of the schools wrap BARBRI test prep into their costs – which would be an illegal use of Title IV funds.

These kinds of schools are of so little value that they have been cut off from GI Bill benefits under a law enacted in 2021. These schools fail to meet the minimum ABA standards of a legal education, and WASC has not established rigorous alternatives to credibly deem the schools legitimate. WASC lacks the legal expertise to assess law school quality, and the lack of rigor calls into question whether it is “a reliable authority regarding the quality of the education or training provided by the institutions or programs it accredits,” as required by regulation.

In addition, we have concerns about WASC’s oversight of the University of Arizona Global Campus. While we are aware of some efforts by WASC to monitor UAGC, more meaningful action is needed.

UAGC’s predecessor, Ashford University, and its OPM, Zovio, had several red flags, including Ashford’s own audit finding rampant deceptive practices; California’s lawsuit; whistleblower allegations about the deception of veterans; and hundreds of veteran complaints.

We raised concerns in our written comments last year that misconduct may still be occurring. It appears that almost 2/3rds of the Zovio employees continued at UAGC, and it is concerning that WASC did not demonstrate to the Department that it increased scrutiny of UAGC in response to concerns related to recruitment and admissions. It appears WASC may be accepting UAGC’s self-reports rather than conducting its own review and verification.

We ask you to examine whether WASC has appropriately applied its standards to ensure that the deceptive practices employed by Ashford and Zovio are indeed no longer occurring at UAGC.

Thank you for the opportunity to comment.