

CHAD A. READLER
Acting Assistant Attorney General

ALEX G. TSE
Acting United States Attorney

MARCIA BERMAN
Assistant Branch Director

KAREN S. BLOOM
Senior Counsel
R. CHARLIE MERRITT
Trial Attorney
Civil Division, Federal Programs Branch
U.S. Department of Justice
P.O. Box 883
Washington, D.C. 20044
Telephone: (202) 616-8098
Facsimile: (202) 616-8460
E-mail: robert.c.merritt@usdoj.gov

Attorneys for Defendants

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

MARTIN CALVILLO MANRIQUEZ, *et al.*,

Plaintiffs,

v.

ELISABETH DEVOS, in her official capacity
as Secretary of Education, and the UNITED
STATES DEPARTMENT OF EDUCATION

Defendants.

No. 17-7210

**DEFENDANTS' OPPOSITION TO
PLAINTIFFS' MOTION FOR
PRELIMINARY INJUNCTION**

Date: April 30, 2018

Time: 9:30 a.m.

Place: Courtroom A, 15th Floor

Magistrate Judge Sallie Kim

1 Almost three months after they filed this action, Plaintiffs moved for a preliminary
2 injunction, essentially seeking the same relief they ultimately seek in this action: an order
3 requiring the U.S. Department of Education (“the Department” or “ED”) to fully discharge the
4 federal direct student loan debt of thousands of student borrowers. Because Plaintiffs have not
5 shown that they will suffer irreparable injury absent the injunction, nor have they established
6 their entitlement to the extraordinary mandatory injunction they seek, the Court should deny
7 Plaintiffs’ motion.

8 The Department loans billions of dollars to students annually to help them cover the
9 educational costs of attending post-secondary schools. Where a post-secondary school engages
10 in conduct that would be actionable under applicable state law the Department permits a
11 borrower to raise such conduct as a defense against that borrower’s repayment obligation on a
12 Direct Loan (*i.e.* to raise a “borrower defense” claim). *See* 34 C.F.R. § 685.206(c). If the
13 Department determines that a borrower defense claim is successful, the Secretary of Education
14 (“Secretary”) informs the borrower that s/he is relieved of the obligation to pay all or part of the
15 loan, and the Secretary can also afford the borrower “such further relief as the Secretary
16 determines is appropriate under the circumstances.” *Id.* § 685.206(c)(2).

17 The regulation governing “borrower defense” was promulgated more than twenty years
18 ago, but was rarely used until 2015. That year, Corinthian Colleges, Inc. (“Corinthian” or
19 “CCI”) announced the closure of all of the schools it operated and filed for bankruptcy.
20 Subsequently, the Department received an unprecedented number of borrower defense claims,
21 including 100,000 from student borrowers who had attended Corinthian operated schools. The
22 Department responded with emergency measures to provide relief to affected borrowers on an
23 *ad hoc* basis. Because ED determined that CCI had systemically misrepresented its job
24 placement rates, it began fully discharging associated student loan debt of borrowers who were
25 able to establish that they were aware of and relied on these misrepresentations. But the
26 Department continued to explore ways to improve its process for adjudicating borrower claims,
27 and consistently maintained its discretion to, as provided in the regulation, discharge “all or
28 part” of a loan subject to a successful borrower defense claim.

1 Through its review process, the Department came to the common sense conclusion that
2 the relief for successful borrower defense claims should be based on a measure of the actual
3 harm suffered as a result of the school's misconduct, namely, the lack of value the borrower
4 actually received from the educational program attended. The Department quantified that value
5 by comparing the average earnings of Corinthian claimants who attended a given academic
6 program with the average earnings of students who attended similar programs at schools the
7 Department determined adequately prepare students for gainful employment. The Department
8 utilized information provided by the Social Security Administration ("SSA") pursuant to a pre-
9 existing information sharing agreement between the two agencies.

10 Plaintiffs, four individuals who borrowed federal funds to attend Corinthian schools,
11 seek, on behalf of a putative class, wholesale changes to the Department's borrower defense
12 process, including an order compelling the Department to "immediately" process applications
13 and grant full discharges of all Direct Loans to thousands of former Corinthian students. Almost
14 three months after they initially filed this action, Plaintiffs moved for a preliminary injunction,
15 essentially seeking the same relief (*i.e.*, full loan discharge, as well as various other relief related
16 to their outstanding loan debt) they ultimately seek in this action. Plaintiffs' motion should be
17 denied as failing to satisfy the test for extraordinary preliminary injunctive relief.

18 Plaintiffs have not established irreparable harm. To the contrary, the only concrete
19 harms they claim they will endure, absent such relief, are financial hardships that are, by
20 definition, not irreparable. Nor have Plaintiffs shown that any of their legal claims are likely to
21 succeed. They allege six violations of the Administrative Procedure Act ("APA"), premised on
22 their assertion that the Defendants adopted a "rule" providing for *full* loan discharges to *all*
23 borrowers who attended certain Corinthian programs during certain time periods, and then
24 abandoned that rule in favor of a new one allowing, in some cases, for partial discharge.
25 According to Plaintiffs, Defendants acted unlawfully by "abandoning" the first "rule." Plaintiffs
26 also assert a Privacy Act claim, based on Defendants' use of data allegedly obtained through a
27 "matching program," and a Due Process violation, based on the Defendants' current process for
28 adjudicating borrower defense claims. But their claims are not likely to succeed.

1 First, Plaintiffs do not establish that the Department ever adopted a binding “rule” that
 2 it would grant *full* discharges for *all* Corinthian students in designated cohorts. Therefore,
 3 Plaintiffs’ claims that the Department unlawfully abandoned that rule and unlawfully applied a
 4 replacement rule necessarily fail. Plaintiffs’ claims challenging the Department’s inaction fare
 5 no better because Plaintiffs, in seeking to compel the Department to discharge student loan debts
 6 for thousands of students, do not demonstrate that the Department failed to take a *discrete*
 7 agency action that it is *required* to take. Plaintiffs’ Privacy Act claim is a non-starter because
 8 it seeks injunctive relief unavailable under that statute, and in any event the challenged data
 9 sharing arrangement does not meet the statutory definition for a “matching program.”
 10 Moreover, their Due Process challenge is unlikely to succeed because Plaintiffs have not
 11 demonstrated a cognizable property interest in the discharge they seek and, even if they had,
 12 Defendants have afforded adequate procedural protections of such interest. And finally,
 13 because Plaintiffs have not shown that the Department adopted a new “rule,” they have not
 14 shown that such adoption, or any other Department conduct, is arbitrary or capricious.

15 The requested injunction, which would drastically interfere with the Department’s
 16 discretionary processing of borrower defense claims and drain millions of dollars from other
 17 educational programs, is not in the public interest. The Court should deny Plaintiffs’ motion.

18 **BACKGROUND**

19 **I. Statutory And Regulatory Background**

20 **A. The William D. Ford Federal Direct Loan Program**

21 Under Title IV of the HEA, 20 U.S.C. § 1070 *et seq.*, the Department can enter into an
 22 agreement with a post-secondary school that permits students to receive federal grants and loans
 23 to pay for the cost of attendance at the school. The William D. Ford Federal Direct Loan
 24 Program is the largest student loan program authorized under Title IV, *see* 20 U.S.C. § 1087a
 25 *et seq.* This program allows students to apply for and receive Direct Loans from the federal
 26 government to pay for their educational expenses, including tuition and living expenses. *Id.* §
 27 1087ll. Congress has granted the Department broad authority to implement and administer the
 28 HEA and, in particular, the Direct Loan Program. *See* 20 U.S.C. §§ 1221e-3, 3474.

B. Borrower Defense to Repayment

The HEA authorizes the Secretary to “specify in regulations which acts or omissions of an institution of higher education a borrower may assert as a defense to repayment” of a Direct Loan. 20 U.S.C. § 1087e(h). Pursuant to this authority, the Department codified regulations permitting a borrower, “[i]n any proceeding to collect on a Direct Loan,” to “assert as a defense against repayment, any act or omission of the school attended by the student that would give rise to a cause of action against the school under applicable State law.” 34 C.F.R. § 685.206(c).

The regulation does not set forth any process or timeline for the Department to employ in processing or adjudicating claims for borrower defense, and does not provide any standard or threshold of proof for the Department to apply in determining whether an asserted basis for borrower defense demonstrates “a cause of action against the school under applicable State law,” or entitles the borrower to relief. *See, e.g.*, 81 Fed. Reg. 39,330, 39,346 (June 16, 2016) (“2016 NPRM”) (notice of proposed rulemaking recognizing that the existing borrower defense regulation “does not provide a process for claims”). Instead, the regulation simply provides that when a borrower asserts a “successful” defense against repayment, “the Secretary notifies the borrower that the borrower is relieved of the obligation to repay all *or part* of the loan and associated costs and fees that the borrower would otherwise be obligated to pay . . . [and] . . . affords the borrower such further relief as the Secretary determines is appropriate under the circumstances.” 34 C.F.R. § 685.206(c)(2) (emphasis added). In addition, the Secretary “may initiate an appropriate proceeding to require the school whose act or omission resulted in the borrower’s successful defense against repayment of a Direct Loan to pay to the Secretary the amount of the loan to which the defense applies.” *Id.* § 685.206(c)(3).

C. Gainful Employment

The HEA conditions a proprietary school’s eligibility to participate in the Title IV loan programs on such school’s providing “an eligible program of training to prepare students for gainful employment in a recognized occupation.” *See* 20 U.S.C. §§ 1002(b)(1)(A)(i), 1002(c)(1)(A), 1088(b)(1)(A)(i). To enforce this gainful employment (“GE”) requirement, the Department assesses whether a particular program prepares its students to earn enough to repay

1 their loans, or are sufficiently low cost, such that students are not unduly burdened with debt,
 2 *i.e.*, whether it prepares them for “gainful employment in a recognized occupation.” *See* Final
 3 Rule, Program Integrity: Gainful Employment, 79 Fed. Reg. 64,890, 64,892 (Oct. 31, 2014)
 4 (quoting 20 U.S.C. § 1001(b)(1)). ED’s regulations establish two “debt-to-earnings” rate
 5 measures (“D/E rates”) to evaluate the amount of debt students who completed a “gainful
 6 employment” program incurred to attend that program in comparison to those same students’
 7 earnings after completing the program. 34 C.F.R. § 668.404. A program “pass[es]” the gainful
 8 employment requirement if such students’ median annual loan payment is less than or equal to
 9 20% of discretionary income or 8% of annual earnings. *Id.* § 668.403(c).

10 The Department uses data from the SSA’s Master Earnings File (“MEF”). *See* 79 Fed.
 11 Reg. at 64,950. For each award year, it determines the D/E rates for a GE program by creating
 12 a list of students who completed the program, obtaining from SSA the mean and median
 13 earnings of the students on the list, and comparing that income data with the students’ median
 14 loan debt. *See* 34 C.F.R. §§ 668.404, 668.405. The Department publishes its D/E rates for each
 15 program, as well as the underlying earnings data as reported by the SSA, on its website.¹

16 The Department and SSA share information in this manner pursuant to a written
 17 agreement designed to ensure that the information SSA provides “cannot be associated with, or
 18 otherwise identify, directly or indirectly, a particular individual.” *See* Amended Information
 19 Exchange Agreement, Aggregate Earnings Data at 1 (May 24, 2013) (“Earnings Data
 20 Agreement”), Attached as Exhibit 27 to Declaration of Joshua D. Rovenger, ECF No. 35-8 at
 21 42-50. In particular, the Department sends SSA a file containing certain identifying information
 22 for students enrolled in particular educational programs, and SSA computes “aggregate earnings
 23 data by specific group as provided by [the Department]” including “the mean and median
 24 income information of individuals in each group.” *Id.* at 3 (ECF No. 35-8 at 44). SSA provides
 25 to ED only “aggregate, statistical data without any personal identifiers.” *Id.*

26 **II. The Collapse of Corinthian Colleges and the Department’s Response**

27 **A. The Department’s Findings of Fraud at Corinthian Colleges**

28 ¹ *See* <https://studentaid.ed.gov/sa/about/data-center/school/ge>

1 In the spring of 2015, in the wake of multiple federal and state investigations into its
 2 misconduct, Corinthian announced the closure of all of its schools and filed for bankruptcy. 81
 3 Fed. Reg. at 39,335; *see also* United States Department of Education, First Report of the Special
 4 Master for Borrower Defense to the Under Secretary² (“First Special Master Report”) (Sept. 3,
 5 2015). The Department’s investigation concluded, in publicly released findings, that Corinthian
 6 systematically misrepresented the rates at which its graduates were employed (*i.e.*, its “job
 7 placement rates”) across a number of its campuses nationwide.³ As the Special Master
 8 appointed by the Department in 2015 to oversee borrower defense issues concluded, CCI’s
 9 closure was “a landmark event for the concept of borrower defense to repayment.” First Special
 10 Master Report at 5. Previously, the borrower defense regulation had been “rarely used,” 81
 11 Fed. Reg. at 39,330, but Corinthian’s collapse “almost immediately produced over 1,000 claims
 12 from borrowers for a defense to repayment,” First Special Master Report at 5, a number that
 13 has climbed upwards towards 100,000 total claims over the last two years. *See* U.S. Department
 14 of Education, Office of Inspector General (“OIG”), *Federal Student Aid’s Borrower Defense to*
 15 *Repayment Loan Discharge Process* (Dec. 8, 2017) (“OIG Report”).⁴

16 Beginning in 2015, the Department published information on its website about the
 17 availability of and process for certain CCI borrowers to seek various avenues of relief, including
 18 through borrower defense.⁵ This includes links to lists of CCI campuses and academic programs
 19 covered by the Department’s findings regarding misleading job placement rates. These lists
 20

21 ² *See* [https://www2.ed.gov/documents/press-releases/report-special-master-borrower-defense-](https://www2.ed.gov/documents/press-releases/report-special-master-borrower-defense-1.pdf)
 22 [1.pdf](https://www2.ed.gov/documents/press-releases/report-special-master-borrower-defense-1.pdf)

23 ³ *See* Notice of Intent to Fine Heald College, April 14,
 24 2015, <https://www2.ed.gov/documents/press-releases/heald-fine-action-placement-rate.pdf>; *see also* <https://studentaid.ed.gov/sa/about/announcements/corinthian> (summarizing findings
 25 regarding Corinthian’s misrepresentation of job placement rates at certain campuses).

26 ⁴ *See* <https://www2.ed.gov/about/offices/list/oig/auditreports/fy2018/i04r0003.pdf>

27 ⁵ *See* Federal Student Aid (“FSA”), Information about Debt Relief for Corinthian Colleges
 28 Students (“FSA Announcement”), *available at* <https://studentaid.ed.gov/sa/about/announcements/corinthian>

1 contain the name of each program and a date range to which the findings apply, and specify that
 2 a student's first date of enrollment in the program must fall within the date range for the student
 3 to be covered by the findings.⁶ In order to simplify the application process for affected students,
 4 the Department created attestation forms allowing a borrower to apply for a borrower defense
 5 loan discharge by verifying the program s/he attended and the dates of attendance, and certifying
 6 that s/he chose to enroll based, in substantial part, on the school's advertising materials and
 7 certain other available information regarding job placement rates.⁷

8 These attestation forms, however, do not specify whether the "loan forgiveness" they
 9 allow borrowers to apply for relates to "all" or instead "part" of the loan debt the borrower
 10 would otherwise be obligated to pay, 34 C.F.R. § 685.206(c)(2), thus mirroring ED's other
 11 public statements about the relief available to CCI borrowers. *See, e.g.*, June 2015 Press
 12 Release;⁸ FSA Announcement; First Special Master Report at 7 ("FSA conducted an email
 13 outreach campaign to ... borrowers...to notify them that they may be eligible for [some] debt
 14 relief based on borrower defense.").

15 **B. The Department's Processing of Borrower Defense Applications**

16 Based on these developments, a significantly increased number of student borrowers
 17 have submitted borrower defense claims in recent years. After receiving fewer than 10 such
 18 applications prior to 2015, the Department received, in 2016 alone, 77,340 borrower defense
 19 applications, and another 47,540 in 2017. *See* U.S. Department of Education, Office of
 20

21
 22 ⁶ *See* <https://studentaid.ed.gov/sa/sites/default/files/heald-findings.pdf> (last visited Apr. 12,
 23 2018) (listing Heald College programs); [https://studentaid.ed.gov/sa/sites/default/files/ev-wy-](https://studentaid.ed.gov/sa/sites/default/files/ev-wy-findings.pdf)
[findings.pdf](https://studentaid.ed.gov/sa/sites/default/files/ev-wy-findings.pdf) (listing Everest/WyoTech programs).

24 ⁷ *See* <https://borrowerdischarge.ed.gov/FormWizard/RLD/RLDReview.aspx> (displaying
 25 attestations for Heald College);
 26 [https://borrowerdischarge.ed.gov/FormWizard/RLD/RLDReview.aspx?School=EverestWyoT](https://borrowerdischarge.ed.gov/FormWizard/RLD/RLDReview.aspx?School=EverestWyoTech)
[ech](https://borrowerdischarge.ed.gov/FormWizard/RLD/RLDReview.aspx?School=EverestWyoTech) (displaying attestations for Everest/WyoTech) ("Attestation Forms").

27 ⁸ *See* [https://www.ed.gov/news/press-releases/fact-sheet-protecting-students-abusive-career-](https://www.ed.gov/news/press-releases/fact-sheet-protecting-students-abusive-career-colleges)
 28 [colleges](https://www.ed.gov/news/press-releases/fact-sheet-protecting-students-abusive-career-colleges)

1 Postsecondary Education *Borrower Defense Claims: Data Analysis*, at 6 (Nov. 2017).⁹ As of
 2 November 2017, the Department had resolved over 31,000 of these applications. *Id.* The
 3 Department continues to engage in the process of reviewing, adjudicating, and processing the
 4 remaining claims, and on December 20, 2017, announced that it had “approved for discharge
 5 12,900 pending claims submitted by former Corinthian Colleges, Inc. students, and 8,600
 6 pending claims have been denied. This action includes claims that have been received during
 7 this administration.” U.S. Department of Education, Improved Borrower Defense Discharge
 8 Process Press Release (December 20, 2017) (“December Press Release”), attached as Exhibit 1
 9 to Declaration of James F. Manning (“Manning Decl.”).¹⁰

10 **C. The Department’s Improved Discharge Process**

11 Throughout 2015 and 2016, the Department awarded full discharges of Direct Loan debt
 12 to Corinthian borrowers who were able to establish a successful defense to repayment based on
 13 the Department’s findings. *See, e.g.*, Manning Decl. ¶ 9. As the number of claims increased,
 14 however, the Department established a “review panel” to examine the Department’s existing
 15 borrower defense process and make “recommendations on how to resolve pending borrower
 16 defense claims” going forward. *Id.* ¶ 7. This internal review identified several “weaknesses,”
 17 including a largely unsupported assumption that “all Corinthian students received nothing of
 18 value from their education.” Remarks of James F. Manning at 9-11 (Jan. 8, 2018) (“Manning
 19 Remarks”), attached as Exhibit 2 to Manning Decl.¹¹ However, the available evidence,
 20 including earnings data collected through its assessment of gainful employment programs, *see*
 21 Manning Decl. ¶ 14, suggested that, in many cases, Corinthian graduates “did in fact receive

22 ⁹ *See* <https://www2.ed.gov/policy/highered/reg/hearulemaking/2017/borrowerdefense.html>.

23 ¹⁰ The Manning Declaration is attached as Exhibit A. The Court can consider post-hoc agency
 24 affidavits stating a contemporaneous explanation of the agency decision. *See, e.g., Olivares v.*
 25 *Transp. Sec. Admin.*, 819 F.3d 454, 463-64 (D.C. Cir. 2016) (internal agency materials and
 26 affidavit submitted to court after agency initially denied, without explanation, an application
 27 for training satisfied APA requirement for brief statement of grounds for denial); *Tourus*
 28 *Records, Inc. v. DEA*, 259 F.3d 731, 737-740 (D.C. Cir. 2001) (deciding not to remand case
 due to agency decision’s insufficient statement of reasons where internal agency memoranda
 clarified and justified the agency decision).

¹¹ The remarks are excerpted from a larger transcript of ED’s negotiated rulemaking session
 on January 8, 2018, and are cited according to the document’s internal pagination.

1 something of substantial value from their education,” and that groups of students at CCI
 2 programs “in many instances performed even better than those from well-performing GE
 3 programs.” Manning Remarks at 11; *see also* Declaration of Phillip Juengst ¶ 11 (“Juengst
 4 Decl.”) (attached as Exhibit B) (noting that 51 of the 106 CCI programs for which the
 5 Department had GE data for the 2015 debt measure year had passing GE ratings, while only six
 6 had failing ratings). The Department thus determined to “reevaluate the assumption” used in
 7 fashioning relief that Corinthian students received no value from their education, Manning Decl.
 8 ¶ 15, and explore an “alternative approach,” Manning Remarks at 11.

9 At the conclusion of this “careful review to ensure a fair and efficient process,” the
 10 Secretary announced, on December 20, 2017, an “improved discharge process for borrower
 11 defense to repayment” claims. December Press Release. In order to tether a borrower’s ultimate
 12 relief to the harm suffered as the result of attending a program that has made misrepresentations,
 13 the Department announced a system of “proportionally tiered relief” based on an assessment of
 14 a borrower’s earnings capacity as a result of having attended CCI. *Id.* The process announced
 15 in the December Press Release is further explained in a Department memorandum, which
 16 highlights ED’s conclusion that these borrowers’ harm “may be determined by assessing the
 17 value students received from the education provided by CCI.” Juengst Decl. ¶ 7. Many
 18 borrowers “failed to provide any real evidence of harm,” Manning Remarks at 11, but to the
 19 extent they did, the harm alleged was generally quantified in terms of “struggles” in “finding
 20 employment because of an alleged lack of value provided” by a CCI education, Manning Decl.
 21 ¶ 11. In order to determine the value of that education, the Department compared “average
 22 earnings of CCI claimants who attended a given academic program to the earnings of students
 23 who attended and had completed similar programs at schools the Department has determined
 24 adequately prepare students for gainful employment.” Borrower Defense Relief Methodology
 25 for CCI Claims at 1 (“Methodology Memo”), Attached as Exhibit 1 to Juengst Decl.

26 To perform this comparison, ED conducted an analysis to establish the appropriate “tier”
 27 of relief applicable for each program, by academic credential level, that was offered by CCI
 28 schools. The Department first defined the set of Corinthian programs and credentials,

1 identifying 79 program and academic credential groups. Methodology Memo at 2-3. Next, it
2 submitted information identifying the students in each program to SSA, in the same manner and
3 pursuant to the same information sharing agreement used to calculate earnings data for the
4 gainful employment D/E rates. SSA then provided the Department with the “mean and median
5 incomes” for each of the 79 groups of Corinthian programs and academic credentials. *Id.* at 3.

6 This average and median earnings data provides an objective measure of the value of
7 the education received at the relevant Corinthian program by academic credential level. The
8 Department then compared that average and median earnings data with the average and median
9 earnings at comparable programs that earned a “passing” score under the Department’s gainful
10 employment regulations. *See* Methodology Memo at 3 (explaining how Corinthian programs
11 were mapped to “Classification of Instructional Programs,” or “CIP” codes, as defined by the
12 National Center for Education Statistics, and then compared with GE programs with the same
13 CIP codes and academic credential levels).

14 On this basis, the Department was able to “ensure an apples-to-apples comparison of
15 earnings data,” Manning Remarks at 11, and establish a baseline of the average earnings a CCI
16 student could have reasonably expected to receive when choosing an education program. The
17 difference between that expected average earning capacity, and the average earnings at the CCI
18 program attended, represents the educational value, or lack thereof, of the Corinthian program.
19 *See* Manning Decl. ¶ 17; Juengst Decl. ¶ 7. To the extent a student attended a CCI program at
20 which the average earnings is less than 50% of that baseline, the Department determined that
21 the Corinthian program did not “provide measurable value to CCI students,” and will award a
22 100% discharge of outstanding loans related to the claim to make the affected student whole.
23 Methodology Memo at 4. But to the extent a Corinthian program has yielded an average earning
24 capacity that is 50% or more of what the student could expect to receive at a comparable gainful
25 employment program, the Department determined that student received some amount of value
26 from the education and suffered harm less than the full value of money borrowed to attend that
27 program. *Id.* at 4-5. The amount of relief provided to the borrower would then be grouped into
28

1 tiers of 10%, rounded upward, including a minimum of 10% relief to any borrower with a
2 successful defense to repayment claim. *Id.* at 5.

3 As the Department noted in the December Press Release, all rounding is done to the
4 benefit of the student, such that a borrower who had enrolled in a program with average earnings
5 of 59% of comparable GE program earnings would be provided with a 50% reduction in her
6 federal student loans. *See also* Methodology Memo at 4-5; Juengst Decl. ¶¶ 25-29 (discussing
7 various procedures Department used to implement “guiding principle” of suing earnings
8 comparisons favoring the borrower). Finally, for certain approved loans, the Department
9 applies a credit for the amount approximately equal to some of the interest that has accrued on
10 the borrower’s associated loans while the claim was pending prior to completing the discharge
11 process. December Press Release.

12 **III. This Lawsuit**

13 Plaintiffs moved to amend their complaint on March 17, 2018, adding a new plaintiff
14 and three new claims.¹² *See* First Amended Compl. for Declaratory & Inj. Relief (“Am.
15 Compl.”), ECF No. 33. As noted above, Plaintiffs assert seven claims for relief pursuant to the
16 APA, the Privacy Act, and the Due Process clause. Their putative class action seeks to represent
17 “all individuals who borrowed a Direct Loan to finance the cost of enrollment in a program who
18 are covered by the Department’s Corinthian Job Placement Rate Rule, who have applied or will
19 apply for a borrower defense, and who have not been granted the full relief provided for by the
20 Rule.” *Id.* ¶ 257. Plaintiffs moved for a preliminary injunction the same day, asserting a
21 likelihood of success on the merits on all seven counts and various economic and other allegedly
22 “irreparable,” harms. *See* Pls.’ Notice of Mot. & Mot. for Prelim. Inj. (“PI Mot.”), ECF No. 35.
23 Plaintiffs seek an order requiring the Department to, among other things, “stop applying its
24 ‘Average Earnings Rule’ to members of the proposed class, and to process Plaintiffs’ claims
25 under the ‘Corinthian Job Placement Rule,’” as defined by Plaintiffs. *Id.* at 1.

26
27 ¹² Defendants note that Plaintiffs have not yet been granted leave to amend, and are separately
28 filing their opposition to Plaintiffs’ amendment. Solely for purposes of this opposition brief,
however, Defendants will assume the claims in the proposed Amended Complaint are operative.

ARGUMENT

A preliminary injunction “is an extraordinary and drastic remedy, one that should not be granted unless the movant, *by a clear showing*, carries the burden of persuasion.” *Mazurek v. Armstrong*, 520 U.S. 968, 972 (1997) (per curiam) (citation omitted). A plaintiff “must establish that he is likely to succeed on the merits, that he is likely to suffer irreparable harm in the absence of preliminary relief, that the balance of equities tips in his favor, and that an injunction is in the public interest.” *Am. Trucking Ass’n*s, 559 F.3d at 1052 (citation omitted). A “possibility” of irreparable harm is insufficient; irreparable harm must be *likely* absent an injunction. *Id.*; *see also Winter*, 555 U.S. at 22 (rejecting Ninth Circuit’s earlier rule that the “possibility” of irreparable harm, as opposed to its likelihood, was sufficient in some circumstances to justify preliminary injunction). Alternatively, “‘serious questions’ going to the merits’ and a balance of hardships that tips sharply towards the plaintiff can support issuance of a preliminary injunction, so long as the plaintiff also shows that there is a likelihood of irreparable injury and that the injunction is in the public interest.” *All. for the Wild Rockies v. Cottrell*, 632 F.3d 1127, 1135 (9th Cir. 2011); *see also Leiva-Perez v. Holder*, 640 F.3d 962, 967-68 (9th Cir. 2011). Plaintiffs bear the burden of demonstrating that each of these four factors is met. *DISH Network Corp. v. FCC*, 653 F.3d 771, 776-77 (9th Cir. 2011).

The standard for a preliminary injunction is even higher where, as here, Plaintiffs seek a mandatory or affirmative injunction that would alter the status quo rather than preserve it. *See, e.g., Stanley v. Univ. of S. Cal.*, 13 F.3d 1313, 1320 (9th Cir. 1994); *Texas Children’s Hosp. v. Burwell*, 76 F. Supp. 3d 224, 247 (D.D.C. 2014); *Sweis v. U.S. Foreign Claims Settlement Comm’n*, 950 F. Supp. 2d 44, 48 (D.D.C. 2013). A mandatory injunction “goes well beyond simply maintaining the status quo *pendente lite* and is particularly disfavored.” *Garcia v. Google, Inc.*, 786 F.3d 733, 740 (9th Cir. 2015) (citation omitted). Such relief should be denied “unless the facts and law clearly favor the moving party.” *Id.*; *see also Hernandez v. Sessions*, 872 F.3d 976, 999 (9th Cir. 2017) (explaining that mandatory injunctions are “subject to a higher standard than prohibitory injunctions” and are only permissible when “‘extreme or very serious damage will result’ that is not ‘capable of compensation in damages,’ and the merits of the case

are not ‘doubtful’” (citation omitted)).

Plaintiffs here seek far more than a prohibitory injunction. They ask the Court to force the Department to remove negative credit reporting on Plaintiffs’ outstanding federal loan debt, restore federal student loan eligibility to Plaintiffs (presumably regardless of whether there are other independent bars to this eligibility) and to process Plaintiffs’ claims under the “Corinthian Job Placement Rate Rule” (*i.e.*, to force the Department to process the claims under a different framework than it otherwise has chosen to employ). PI Mot. at 1.; *see also* Pls.’ Proposed Order Granting Pls.’ Mot. for Prelim. Inj. at 4, ECF No. 35-9 (proposing that Court require, among other things, that the Department, “within 10 days, begin processing Plaintiffs’ applications *and grant them the relief provided* under the Corinthian Job Placement Rate Rule” (emphasis added)). Through this requested relief, Plaintiffs seek not only to “maintain the status quo” pending litigation, but to place themselves in a better position than they were in before the onset of the current controversy through an award of “the exact same ultimate relief” they seek in their Amended Complaint. *Taiebat v. Scialabba*, 2017 WL 747460, at *2-3 (N.D. Cal. Feb. 27, 2017). “In general, that kind of judgment on the merits in the guise of preliminary relief is a highly inappropriate result.” *Senate of Cal. v. Mosbacher*, 968 F.2d 974, 978 (9th Cir. 1992).

I. Plaintiffs Have Not Shown They Will Be Irreparably Harmed

A preliminary injunction serves the “limited purpose” of “preserv[ing] the relative positions of the parties until a trial on the merits can be held.” *Univ. of Tex. v. Camenisch*, 451 U.S. 390, 395 (1981). Accordingly, “[a]n essential prerequisite” before granting a preliminary injunction is a showing that irreparable injury is likely in the absence of an injunction. *See Dollar Rent A Car of Wash., Inc. v. Travelers Indem. Co.*, 774 F.2d 1371, 1375 (9th Cir. 1985); *Winter*, 555 U.S. at 19. “Irreparable harm” is traditionally defined as harm for which there is no adequate legal remedy, such as an award of damages. *Ariz. Dream Act Coal. v. Brewer*, 855 F.3d 957, 978 (9th Cir. 2017). This standard is demanding: “Mere injuries, however substantial, in terms of money, time and energy necessarily expended in the absence of a stay, are not enough” to qualify as irreparable, and “[t]he possibility that adequate compensatory or other corrective relief will be available at a later date . . . weighs heavily against a claim of irreparable

1 harm.” *Sampson v. Murray*, 415 U.S. 61, 90 (1974).

2 Plaintiffs here allege that, absent a preliminary injunction, they will suffer harms in the
3 form of violations of their constitutional rights, invasion of their privacy, dignitary and emotional
4 harms, and financial hardships. *See* PI Mot. at 46-49. None of these putative harms are
5 sufficiently irreparable to warrant a preliminary injunction.

6 **A. Alleged Economic Harms Are Not Beyond Remediation**

7 Plaintiffs claim they are entitled to a preliminary injunction because absent such
8 injunction they will suffer “financial damages.” *Id.* at 48 (alleging that the Department seeks to
9 reduce the amount of loan cancellation afforded to Plaintiffs). However, it is well established
10 that “monetary harm” and “financial hardship” are not irreparable injuries. *Elias v. Connett*, 908
11 F.2d 521, 526 (9th Cir. 1990); *Monge v. Smyth*, 229 F.2d 361, 367 (9th Cir. 1956); *Sampson*,
12 415 U.S. at 90; *see also Stanley*, 13 F.3d at 1320 (holding that plaintiff had adequate remedy at
13 law for claims seeking money damages and back pay for the loss of her job); *Loft v. Stationary*
14 *Eng’rs, Local 39*, 2014 WL 709980, at *4 (N.D. Cal. Feb. 24, 2014) (loss of job and pension
15 benefits is not irreparable); *Belzer v. Am. Airlines*, 2007 WL 685865, at *2 (E.D. Cal. Mar. 5,
16 2007). Plaintiffs acknowledge as much. *See* PI Mot. at 47 (“economic harm does not generally
17 constitute an irreparable injury”).

18 Nevertheless, Plaintiffs attempt to argue that they will be irreparably harmed absent an
19 injunction because, based on decisions of courts in other circuits, they believe economic harm
20 “may be grounds for an injunction where a Plaintiff lives on a fixed income and minimal
21 increases in their cost of living creates ... possible ‘deprivation of life’s necessities’ and
22 concomitant ‘emotional distress.’” *Id.* (emphasis added). Such a tentative, speculative argument
23 cannot establish irreparable harm.¹³ *Volis v. City of Los Angeles Hous. Auth.*, 2013 WL 12214417

24
25 ¹³ Plaintiffs’ papers do not support the conclusion that any named Plaintiff may face a possible
26 deprivation of “life’s necessities,” as a result of Defendants’ conduct. And even if they did with
27 respect to one particular borrower, this would not support an injunction as to other borrowers.
28 *See Adams v. Freedom Forge Corp.*, 204 F.3d 475, 487 (3d Cir. 2000) (“[I]n the absence of a
foundation from which one could infer that all (or virtually all) members of a group are
irreparably harmed, we do not believe that a court can enter a mass preliminary injunction.”).

(C.D. Cal. May 6, 2013) (“Speculative injury does not constitute irreparable injury”); *see also Herb Reed Enters., LLC v. Fla. Entm’t Mgmt., Inc.*, 736 F.3d 1239, 1251 (9th Cir. 2013).¹⁴

B. Neither Invasion Of Privacy, Nor Dignitary And Emotional Harms Are Irreparable

Plaintiffs allege that the financial harm the Department is causing them creates “immeasurable” “overlapping” “stress and worry.” *See* PI Mot. at 46, 48. They also allege that the Department’s infringement of Plaintiffs’ privacy caused “dignitary and emotional harms” “by denying them relief based on that very infringement.” *Id.* at 46. But Plaintiffs do not cite any authority in support of these vague notions, and the Supreme Court has made clear that a showing of reputational harm, even coupled with lost earnings, “falls far short of the type of irreparable injury which is a necessary predicate to the issuance of a temporary injunction.” *Sampson*, 415 U.S. at 91-92; *see also Volis*, 2013 WL 12214417, at *2 (“Conclusory affidavits are insufficient to demonstrate irreparable harm.”). Applying *Sampson*, the Ninth Circuit has rejected assertions of irreparable harm stemming from reputational damage (*i.e.*, dignity harms), and psychological injury. *See, e.g., Hartikka v. United States*, 754 F.2d 1516, 1518 (9th Cir. 1985) (lost income, lost retirement and relocation pay, and damage to a military service member’s *reputation* resulting from the stigma of a less-than-honorable discharge did not constitute irreparable harm); *Kennedy v. Sec’y of Army*, 191 F.3d 460 (9th Cir. 1999) (unpublished table decision); *See also Heineke v. Santa Clara Univ.*, 2017 WL 4098887, at *2-5, 7 (N.D. Cal. Sept. 15, 2017).

C. Alleged Constitutional Violations Are Not Per Se Irreparable

Plaintiffs allege that “[a]bsent an injunction returning to the *status quo ante*” they will suffer irreparable violations of their constitutional rights. PI Mot. at 46. Even if Plaintiffs clearly

¹⁴ Plaintiffs also allege that they are suffering “financial damages” that they “will be unable to recover from the government.” PI Mot. at 48. But “the mere fact that economic losses may be unrecoverable does not, in and of itself, compel a finding of irreparable harm.” *Save Jobs USA v. DHS*, 105 F. Supp. 3d 108, 114 (D.D.C. 2015) (citation omitted). Indeed, a rule to the contrary would “effectively eliminate the irreparable harm requirement” in a suit against a defendant with sovereign immunity. *Air Trans. Ass’n of Am., Inc. v. Exp.-Imp. Bank of the U.S.*, 840 F. Supp. 2d 327, 335 (D.D.C. 2012).

1 demonstrated that Defendants' conduct violated the Due Process clause, which they do not, the
 2 nature of this violation is not, in any sense, irreparable. Plaintiffs sidestep their obligation to
 3 show that the constitutional violations they allege actually yield irreparable harm, relying instead
 4 on their erroneous and unsupported over-statement that "the prospect of that constitutional
 5 violation *alone* justifies a preliminary injunction." *Id.* But the mere assertion of a due process
 6 violation is not sufficient to establish irreparable harm. *See, e.g., Mitchell v. Cate*, 2014 WL
 7 2895232 (E.D. Cal. June 25, 2014) (rejecting plaintiffs' contention that they "are likely to face
 8 irreparable injury because they have alleged that Defendants will violate their equal protection
 9 rights absent an injunction"); *Vaqueria Tres Monjitas, Inc. v. Irizarry*, 587 F.3d 464, 484-85 (1st
 10 Cir. 2009) ("[I]t cannot be said that violations of plaintiffs' rights to due process and equal
 11 protection automatically result in irreparable harm"); *Siegel v. LePore*, 234 F.3d 1163, 1178
 12 (11th Cir. 2000) (violating constitutional rights does not always constitute irreparable harm);
 13 *Hohe v. Casey*, 868 F.2d 69, 73 (3d Cir. 1989) ("Constitutional harm is not necessarily
 14 synonymous with the irreparable harm necessary for issuance of a preliminary injunction.").
 15 Instead, the relevant inquiry is whether Plaintiffs have alleged harm resulting from the
 16 constitutional violation that is in fact irreparable. *See Koff v. Ahern*, 2015 WL 1050167, at *3
 17 (N.D. Cal. Mar. 9, 2015).

18 Unlike in the cases upon which Plaintiffs rely, in which courts relied on finding(s) that
 19 the allegedly continuing constitutional violation was irreparable, Plaintiffs here make no
 20 showing that irreparable injury is likely, and impermissibly seek to show irreparable harm on the
 21 basis of an *alleged* constitutional violation. In *Saravia v. Sessions*, 280 F. Supp. 3d 1168 (N.D.
 22 Cal. 2017), for example, the plaintiffs, undocumented minors, were arrested and transported
 23 across the country to be detained in a secure facility without adequate notice and an opportunity
 24 to be heard. A declaration established that the longer children remained in custody, the more
 25 likely they were to experience negative mental health repercussions, and that if the plaintiffs
 26 remained in custody when they turned eighteen they would be transferred to Immigration and
 27 Customs Enforcement custody and lose the protections afforded to juveniles. On this basis, the
 28 court found plaintiffs had made the requisite showing of irreparable harm. *Id.* at 1200.

1 The second case that Plaintiffs cite, *Lavan v. City of Los Angeles*, 797 F. Supp. 2d 1005
 2 (C.D. Cal. 2011), is similarly distinguishable. See PI Mot. at 46. There, the court noted, without
 3 any specific analysis, that in various cases, courts have presumed irreparable harm from alleged
 4 violations of constitutional rights. But the case it relied on cited *Goldie's Bookstore, Inc. v.*
 5 *Superior Ct. of Cal.*, 739 F.2d 466, 472 (9th Cir.1984), involving a “purposeful unconstitutional
 6 suppression of speech” that the court found constituted irreparable harm, and said nothing about
 7 whether a putative due process violation that at most yielded economic harm could be remedied
 8 by any subsequent ultimate relief. See *Johnson v. San Francisco*, 2010 WL 3078635, at *3 (N.D.
 9 Cal. Aug. 5, 2010) (“it cannot be said that violations of the right to due process and equal
 10 protection automatically result in irreparable harm.”). Here, the harm alleged to result from the
 11 putative due process violation is that some borrower may have to repay some portion of his
 12 federal student loans while the Court evaluates Plaintiffs’ arguments that all such loans should
 13 be forgiven in full. Alleged “due process” violations in such contexts are not irreparable.

14 Because Plaintiffs have not made the required threshold showing of irreparable harm, the
 15 Court need not even address the other three factors of the test for whether a preliminary
 16 injunction is appropriate, and should deny Plaintiffs’ motion. See *Heineke*, 2017 WL 4098887,
 17 at *4 (“If a plaintiff does not or cannot demonstrate irreparable harm if a preliminary injunction
 18 is not granted, the injunction will not be granted.” (citation omitted)).

19 **II. Plaintiffs Have Not Demonstrated A Likelihood Of Success**

20 Even if the Court proceeds to evaluate Plaintiffs’ other arguments, Plaintiffs’ motion
 21 should still be denied because Plaintiffs do not show that their claims are likely to succeed.

22 **A. Plaintiffs Have Not Established That The Department Created and** 23 **Abandoned Any “Rule” Applicable To Their Borrower Defense Claims**

24 The Department has not issued any binding rule, through notice and comment or
 25 otherwise, providing for the full cancellation of loans for Corinthian borrowers in cohorts
 26 covered by the Department’s misrepresentation findings (“findings cohorts”). Nor has it issued
 27 any formal pronouncement indicating that such relief (full loan discharge) will be unavailable in
 28 all future cases relating to such borrowers. Plaintiffs’ claim, then, is premised on their ability to

show that (1) the Defendants, through multiple “public statements,” Am. Compl. ¶ 81, and past adjudication of claims, formulated a binding rule to govern the adjudication of all future claims submitted by all Corinthian borrowers in covered cohorts; and (2) the Defendants have made a final determination to abandon this “rule” in all future cases, again through various “public statements and actions,” including their alleged failure to award full discharge on “successful” claims since January 20, 2017, *see id.* ¶¶ 267-68. According to Plaintiffs, this “abandonment” constitutes final agency action subject to review under the APA. *See* PI Mot. at 25.

But Plaintiffs have failed to establish that the Department created any rule, binding in all future borrower defense adjudications and entitling the Plaintiffs to full discharge of their Direct Loan debt. Therefore, the Department’s subsequent decision to calculate relief for a successful defense to repayment based upon the value of the education received (resulting, at least in some cases, in partial rather than full discharge of a student’s loan) constitutes no unlawful abandonment. The Court therefore lacks jurisdiction to review Plaintiffs’ claims because “allegations of noncompliance with an agency statement that is not binding on the agency” are unreviewable. *United States v. Alameda Gateway Ltd.*, 213 F.3d 1161, 1167 (9th Cir. 2000).

1. There Is No “Corinthian Job Placement Rate Rule,” As Defined By Plaintiffs

Plaintiffs assert that the Department formulated a “Rule to govern claims related to the Department’s findings regarding various Corinthian programs.” PI Mot. at 12. In reality, the Department’s process for adjudicating these claims lacked this level of formality. It is true that the Department made findings that certain CCI-operated campuses systematically misrepresented job placement rates at specific programs during specific periods of time; and the Department did conduct outreach, providing information and a simple attestation form, to assist potentially affected students in asserting a borrower defense on that basis. But these efforts were made on an *ad hoc* basis as part of the Department’s evolving response to the “flood of borrower defense claims submitted by [CCI] students” following its closure, 2016 NPRM, 81 Fed. Reg. at 39,330-331, and it was precisely because the existing regulatory scheme “is silent on the process ... to assert a borrower defense claim,” *id.* at 39,335-336, that the Department found it necessary to engage in rulemaking in 2016 to “establish a more accessible and consistent borrower defense

1 standard and clarify and streamline the borrower defense process,” *id.* at 39,331.

2 To the extent there was any “[r]ule to govern” claims submitted by Corinthian borrowers,
 3 PI Mot. at 12, it was that such borrowers could establish a defense to repayment by attesting to
 4 their date of enrollment in a covered program during a covered time, as well as their reliance on
 5 the relevant campus’ representations regarding job placement rates – ground rules that remain in
 6 effect. Because the Department’s own findings determined that these campuses had engaged in
 7 actionable wrongdoing under state law, affected students were relieved of their normal obligation
 8 to prove their school’s misconduct in order to establish a borrower defense. *See, e.g.*, First
 9 Special Master Report at 7. But even that determination was never codified through any formal
 10 agency process, and in any event stopped well short of “prospectively determin[ing] that all class
 11 members,” PI Mot. at 29 (*i.e.*, all students enrolled in findings cohorts who have submitted *or*
 12 *will submit* a borrower defense claim) were entitled to full discharge of associated loan debt.

13 Nor is such a “full discharge” rule created by the governing regulation, which explicitly
 14 authorizes the Secretary, upon a borrower’s successful defense to repayment, to relieve the
 15 borrower of the obligation to repay “*all or part* of the loan and associated costs and fees that the
 16 borrower would otherwise be obligated to pay,” and further grants the Secretary discretion to
 17 “afford[] the borrower such further relief *as the Secretary determines is appropriate under the*
 18 *circumstances.*” 34 C.F.R. § 685.206I(2) (emphasis added). *Se La Cuna De Aztlan Sacred Sites*
 19 *Prot. Circle Advisory Comm. v. U.S. Dep’t of Interior*, 2013 WL 4500572, at *9 (C.D. Cal. Aug.
 20 16, 2013) (grant of authority to gather information “as appropriate” demonstrated that “the extent
 21 of information gathering . . . is committed to the discretion of the agency”).

22 Instead, Plaintiffs are forced to cobble their “rule” out of “multiple” of the Department’s
 23 “public statements.” PI Mot. at 13.¹⁵ But Plaintiffs’ motion cites only two such “statements,”

24 ¹⁵ Plaintiffs also allege, on “information and belief,” that the “rule” was “codified” in certain
 25 “legal memoranda written, approved, and relied upon by the Department.” Am. Compl. ¶ 80.
 26 While Plaintiffs’ motion relies upon these documents, it does not provide any evidence of their
 27 content. *See* PI Mot. at 15. And Plaintiffs’ “belief” about the existence and contents of such
 28 documents does not carry their burden of “identifying specific federal conduct and explaining
 how such conduct constitutes final agency action within the meaning of the APA,” *Chance v.*

1 an offhand explanation that certain Corinthian borrowers “would have a cause of action under
 2 state law” and a notation in an administrative request to collect information from student
 3 borrowers, *see id.* at 14, neither of which states that any Corinthian borrower who makes the
 4 required attestation is entitled to “full relief ...by cancelling all outstanding amounts on related
 5 loans,” *id.* at 13. In any event, such “public statements” “are not final agency action because
 6 they are not definitive of legal rights or duties,” “do not have the force of law,” and “do not
 7 impose any burden[,]” on their own, on students with pending or anticipated claims for borrower
 8 defense. *Ammons v. Great Lakes Chemical Corp.*, 1986 WL 10743, at *3 (W.D. Wash. July 23,
 9 1986); *see also In re Murray Energy Corp.*, 788 F.3d 330, 336 (D.C. Cir. 2015) (agency
 10 statement regarding legal authority, “unconnected to any final rule or other final agency action[,]”
 11 do not impose any legal obligations or prohibitions”). Indeed, Plaintiffs do not contend that the
 12 “rule” from which they seek to benefit should have gone through the notice-and-comment
 13 procedures that are applicable to “substantive rules,” *i.e.*, those that “create rights, impose
 14 obligations, or effect a change in existing law pursuant to authority delegated by Congress.”
 15 *Yesler Terrace Cmty. Council v. Cisneros*, 37 F.3d 442, 449 (9th Cir. 1994). In conceding that
 16 their alleged “rule” was validly created outside the confines of notice-and-comment rulemaking,
 17 Plaintiffs also concede that it did not “establish[] a binding norm.” *Sacora v. Thomas*, 628 F.3d
 18 1059, 1069 (9th Cir. 2010); *see also Mada-Luna v. Fitzpatrick*, 813 F.2d 1006, 1014 (9th Cir.
 19 1987) (notice-and-comment proceedings required for any agency directive that “effectively
 20 replaces agency discretion with a new ‘binding rule of substantive law’” (citation omitted)).

21 To the extent that Plaintiffs rely on the Department’s alleged “consistent[]” application
 22 of the purported rule in individual adjudications of borrower defense claims, PI Mot. at 15,
 23 Plaintiffs have not carried their burden of showing that the Department created a binding “full

24 *Zinke*, 263 F. Supp. 3d 1178, 1192-93 (N.D. Okla. 2017) (rejecting allegations about agency
 25 action made upon “information and belief”), nor can it be used to demonstrate their entitlement
 26 to the extraordinary preliminary injunctive relief they seek. *See, e.g., Bal. Line Handling Co.*
 27 *v. Brophy*, 771 F. Supp. 2d 531, 543 (D. Md. 2011); *Sprint Nextel Corp. v. Ezcom, Inc.*, 2012
 28 WL 12882422, at *1 (C.D. Cal. Feb. 13, 2012) (rejecting request for preliminary injunction
 based upon allegations made “[u]pon information and belief,” and not upon any “evidence” in
 support of such allegations).

discharge” rule of decision. First, Plaintiffs clearly claim that their “Corinthian Job Placement Rate Rule is a ‘rule’ within the meaning of the APA, 5 U.S.C. § 551(4).” Am. Compl. ¶ 271. This definition is distinct from an “adjudication,” which “results in an order [and] is virtually any agency action that is not rulemaking.” *Yesler Terrace Cmty. Council*, 37 F.3d at 448. In any event, the Department’s history of exercising its discretionary authority to grant relief on successful borrower defense claims, does not establish a “rule.” As noted above, the operative regulation vests the Secretary with significant discretion to determine the measure of relief appropriate for borrowers who can establish a successful defense to repayment based on the misconduct of their school. Prior to the collapse of Corinthian, which represented a “landmark event for the concept of borrower defense to repayment,” First Special Master Report at 5, the Department’s dearth of experience with such claims gave it little opportunity to develop standards to govern the exercise of its discretion. *See id.* (noting that “the Department did not have in place an established infrastructure for accepting, processing, and reviewing large numbers” of borrower defense claims). In the months thereafter, however, the Department was flooded with an unprecedented number of claims for relief in this area, and took emergency measures to provide relief to affected students on an *ad hoc* basis.¹⁶

These emergency relief measures generally included fully discharging associated student loan debt of Corinthian borrowers able to attest to their membership in covered findings cohorts and reliance on CCI’s misrepresentations. But this does not mean that the agency bound itself, forever, to award relief on precisely the same basis, and in exactly the same measure, once it had an opportunity to engage in further review of this process. The Department retained (and retains) the discretion to award full or partial discharge of student loan debts, as appropriate in the circumstances, notwithstanding the fact that it awarded full discharges to Corinthian borrowers in the past. “Where, as here, the agency’s rule gives it the discretion either to consider or to ignore certain factors, [a court] would be remiss to eliminate this discretion by requiring the

¹⁶ See FSA Announcement (recognizing the “pressing need presented by the unique situation for students who attended colleges owned by Corinthian,” and “taking unprecedented action to create a streamlined process that is fair to students who may have been victims of fraud”).

agency to *always* ignore certain factors just because it has ‘often’ ignored these factors in the past.” *Cal. Trout v. FERC*, 572 F.3d 1003, 1025-26 (9th Cir. 2009).

Simply put, Plaintiffs have not identified an agency rule entitling them, or any other members of the proposed class, to a full discharge of their loans. And without such a binding, legally effective rule to govern future relief determinations, Plaintiffs cannot claim that such non-existent rule was “abandoned” by the Defendants’ subsequent actions. *See Indus. Safety Equip. Ass’n, Inc. v. EPA*, 837 F.2d 1115, 1120 (D.C. Cir. 1988) (Congress “clearly” did not intend for the APA’s “definition of a rule [to] be construed so broadly that every agency action would be subject to judicial review,” and citing *Int’l. Tel. & Telegraph Corp. v. Local 134*, 419 U.S. 428, 442-48 (1975), for the proposition that “agency process without binding effect, even if it leads to significant ‘practical consequences,’ is not reviewable under 5 U.S.C. § 551”).

2. Plaintiffs Have Identified No Final Agency Action “Abandoning” Any “Rule” Entitling Them To Full Discharge

Just as Plaintiffs have failed to identify any “rule” entitling them to full discharge, they have failed to establish that, even if such rule had been created, the Department has engaged in any final agency action, reviewable under the APA, “abandoning” that “rule” in all future cases. Under the APA, “[o]nly certain agency actions are subject to judicial review,” *Sierra Forest Legacy v. U.S. Forest Serv.*, 598 F. Supp. 2d 1058, 1067 (N.D. Cal. 2009), and a plaintiff must “identify some ‘agency action’ that affects him in the specified fashion,” *Lujan v. Nat’l Wildlife Fed’n*, 497 U.S. 871, 882 (1990). Because agency action must be “circumscribed” and “discrete,” *Norton v. S. Utah Wilderness All. (“SUWA”)*, 542 U.S. 55, 62 (2004), a plaintiff cannot “seek *wholesale* improvements of [a federal program] by court decree, rather than in the offices of the [agency] or the halls of Congress, where programmatic improvements are normally made,” *Lujan*, 497 U.S. at 891. Moreover, judicial review is only available over agency action that is “final.” *See, e.g., Or. Natural Desert Ass’n v. U.S. Forest Serv.*, 465 F.3d 977, 982 (9th Cir. 2006). In order for an action to meet this finality requirement, it must “mark the consummation of the agency’s decision-making process” and “must be one by which rights or obligations have been determined, or from which legal consequences will flow.” *Bennett v. Spear*, 520 U.S. 154, 178 (1997) (citations omitted). “As a practical matter, this means that final

agency decisions are virtually always written and generally published.” *Navajo Nation v. U.S. Dep’t of Interior*, 819 F.3d 1084, 1098-99 (9th Cir. 2016) (Ikuta, J., dissenting).

Plaintiffs’ challenge to the Defendants’ assorted statements and actions over the past several years are insufficient to establish that the Department adopted and abandoned any binding rule of decision to govern their claims. As discussed above, Plaintiffs do not establish that the Department created a rule that would entitle them to their preferred measure of relief (*i.e.*, full discharge of their loan debts) for a successful defense against repayment. And further, they fail to demonstrate that such a rule was “abandoned” by any final agency action made reviewable by the APA. As such, their attempt to impose a rule of their own making upon the Department, and have it govern the relief available to thousands of current and future applicants for otherwise discretionary relief is an impermissible programmatic challenge. *See Nev. Ass’n of Cty’s. v. U.S. Dep’t of Interior*, 686 F. App’x 407, 408 (9th Cir. 2017).

i. Neither Defendants’ alleged inaction, nor their “public statements” constitute final agency action

Plaintiffs have not identified with specificity any particular agency action that allegedly violates the APA. They note that the Department “has failed to process any claims under the Corinthian Job Placement Rate Rule,” PI Mot. at 15, but they do not style Count I as a challenge to agency inaction or seek, through that Count, to compel any agency action. Rather, they allege that the fact of this *inaction* suggests that the Department has taken the *affirmative action* of abandoning the rule of decision allegedly applicable to all Corinthian borrowers covered by the Department’s findings. But the mere fact that the Department has not yet approved claims does not equate to a final determination that “the beneficiaries of the Rule were no longer able to obtain relief under it.” *Id.* at 25-26. Until the Secretary actually determines the amount of relief a borrower will receive based on a successful borrower defense, she retains the broad discretion to afford whatever relief is “appropriate under the circumstances,” including relieving a borrower of her obligation to repay “part” of a loan. 34 C.F.R. § 685.206(c). Within that discretionary scheme, Plaintiffs cannot establish that mere inaction has altered their rights or constituted the “functional equivalent of final agency action.” *Hi-Tech Pharmacal, Inc. v. FDA*, 587 F Supp.

2d 1, 10 (D.D.C. 2008); *see also* *Def. of Wildlife v. Tuggle*, 607 F. Supp. 2d 1095, 1111 (D. Ariz. 2009) (“[T]here can be no final agency action, where the agency retains the discretion to accept or reject the challenged action.” (citing *Bennett*, 520 U.S. at 178)).

Plaintiffs’ theory of abandonment is also premised on various “public statements” allegedly expressing an intent to abandon Plaintiffs’ purported “rule.” PI Mot. at 15. But as discussed, these types of statements, “unconnected to any final rule or other agency action,” are not “definitive of legal rights or duties” and are not “final agency action.” *In re Murray Energy Corp.*, 788 F.3d at 336; *Ammons*, 1986 WL 10743, at *3. Without tying these public comments to some definitive agency statement, carrying the force of law and definitively determining the measure of relief available, Plaintiffs cannot establish that the Department impermissibly “abandoned” a prior rule requiring it to award a specific measure of relief.

ii. The December Press Release is not subject to review

Perhaps realizing this, Plaintiffs focus their preliminary injunction motion on the Department’s newly announced procedure for calculating the relief available to Corinthian borrowers. *See* PI Mot. at 26. In particular, Plaintiffs argue that the December 20, 2017 press release constitutes an unexplained change in policy from the so-called “Corinthian Job Placement Rate Rule.” *Id.* at 26-27. But, once again, Plaintiffs’ unsupported conclusions are insufficient to establish reviewable final agency action. Put simply, the December 20 press release is a general statement of the Department’s policy and is not itself final agency action. As the D.C. Circuit has explained:

An administrative agency has available two methods for formulating policy that will have the force of law. An agency may establish binding policy through rulemaking procedures by which it promulgates substantive rules, or through adjudications which constitute binding precedents. A general statement of policy is the outcome of neither a rulemaking nor an adjudication; it is neither a rule nor a precedent . . . [and] presages an upcoming rulemaking or announces the course which the agency intends to follow in future adjudications.

Pac. Gas & Elec. Co. v. FPC, 506 F.2d 33, 38 (D.C. Cir. 1974); *see also* *Mada-Luna*, 813 F.2d at 1013-14 (general statement of policy “provides guidance to agency officials in exercising their discretionary powers while preserving their flexibility and their opportunity to make individualized determination[s]”).

1 The purpose of the press release, which was issued neither through rulemaking nor as a
 2 final decision regarding any particular borrower's claim for defense to repayment, is clearly to
 3 "announce[] the course which the agency intends to follow in future adjudications." *Pac. Gas*,
 4 506 F.2d at 38. In particular, it "unveil[s] an improved discharge process," and announces the
 5 Department's intention, in the future, to "adjudicate[] [claims] systematically under the newly
 6 announced discharge process." December Press Release; *See Colwell v. Dep't of Health &*
 7 *Human Servs.*, 558 F.3d 1112, 1124 (9th Cir. 2009) (noting that a general statement of policy
 8 "does not have a present-day binding effect, that is, it does not impose any rights and obligations"
 9 (citations omitted)). The press release calls for a tiered system of relief for CCI borrowers
 10 asserting defenses to repayment; depending on the value of the education received at the relevant
 11 CCI program, a borrower could qualify for full discharge of his/her loans, or a partial discharge
 12 (*i.e.*, full discharge offset by the value of the education received). December Press Release.
 13 Given this range of relief potentially available, the December press release does not, on its own,
 14 "determine any rights or obligations." *Ctr. for Auto Safety v. Nat'l Highway Traffic Safety*
 15 *Admin.*, 452 F.3d 798, 808 (D.C. Cir. 2006). Instead, specific determinations will be necessary
 16 to determine the agency's "final word" on the measure of relief actually available to specific
 17 students in particular programs. *See Mada-Luna*, 813 F.2d at 1013 (notice-and-comment not
 18 required for general statement of policy because "parties can challenge the policy determinations
 19 made by the agency only if and when the directive has been applied specifically to them").
 20 Therefore, the Department's "general policy statement[]" "cannot be taken as 'final agency
 21 action'" that this Court has jurisdiction to review. *Ctr. for Auto Safety*, 452 F.3d at 808.¹⁷

22 Thus, Plaintiffs whose claims have not yet been adjudicated and who have not received
 23 notification of their measure of relief cannot establish a likelihood of success on the merits to
 24 the extent they challenge the December press release and not any particularized application of
 25 that press release to them individually.

26 3. The Department's Determination Of Relief For Plaintiff Craig Is 27 Not An Irrational Departure From Prior Decisions

28 ¹⁷ In any event, a facial challenge to the press release is not "ripe" for judicial review, without further evidence of how the policy is applied in particular cases. *See Colwell*, 558 F.3d at 1128.

1 Named Plaintiff Craig, on the other hand, does allege that she received a decision from
 2 the Department indicating that it would only discharge 20% of her outstanding loans. Am.
 3 Compl. ¶ 254. This alone, however, is not enough to establish that the Department has
 4 impermissibly “abandoned” a prior rule of decision. As discussed above, the Department never
 5 established any binding “rule” to award full discharges to borrowers in the findings cohorts, so
 6 there was no rule from which the Department departed when it issued Ms. Craig’s determination.
 7 Moreover, “agencies are free to announce new principles during adjudication,” so long as they
 8 do not “impose undue hardship by suddenly changing direction, to the detriment of those who
 9 have relied on past policy.” *Cities of Anaheim, Riverside, Banning, Colton & Azusa, Cal. v.*
 10 *FERC*, 723 F.2d 656, 659 (9th Cir. 1984); *see also Ca. Trout*, 572 F.3d at 1023 (inquiry is
 11 whether agency “departed irrationally” from its “usual rules of decision to reach a different,
 12 unexplained result in a single case” (citations omitted)).

13 Here, the decision announced in Ms. Craig’s case was not such an “irrational departure”
 14 from its prior adjudications to warrant reversal. The current administration is entitled to
 15 “evaluate priorities in light of [its] philosophy,” *Motor Vehicle Mfrs. Ass’n of U.S., Inc. v. State*
 16 *Farm Mut. Auto. Ins. Co.*, 463 U.S. 29, 59 (1983) (Rehnquist, J., concurring in part and dissenting
 17 in part), and accordingly convened a panel to review the Department’s process for adjudicating
 18 borrower defense claims and awarding relief. Manning Decl. ¶ 7. Through that review, as
 19 described above, the Department discovered evidence that caused it to reevaluate the conclusion
 20 that Corinthian borrowers received worthless educations. A lack of information regarding
 21 specific harms suffered by such borrowers, combined with earnings data showing that Corinthian
 22 programs “performed relatively well overall under the Department’s GE measures,” Manning
 23 Decl. ¶ 13; *see also* Juengst Decl. ¶ 11, led the Department to conclude that “graduates from
 24 many of Corinthian’s academic programs did in fact receive something of substantial value from
 25 their education. Manning Remarks at 11. On this basis, the Department developed an improved
 26 “methodology used to calculate the amount of relief to award former [Corinthian] students,”
 27 rooted in a determination of the value provided by the relevant Corinthian program, measured
 28 by comparing average earnings of students at that program to the average earnings they

1 reasonably could have expected to receive at a non-Corinthian program that prepares its students
 2 for gainful employment. Methodology Memo at 1; Manning Decl. ¶ 17. As the Department
 3 recognized, a student may receive some value in a Corinthian education notwithstanding the
 4 school's misconduct, and to that extent the harm suffered is not equivalent to the full amount of
 5 loans taken out to attend the program.

6 The Department explained this rationale in Ms. Craig's adjudication notice, which states
 7 that "[t]he amount of loan relief you will receive is based on the Department's assessment of the
 8 value of the education that you received. The Department has determined the value of your
 9 education by comparing the average aggregate earnings of students who attended your program(s)
 10 of study to the average aggregate earnings of students who graduated from similar programs at
 11 other schools that have adequately prepared students for gainful employment"). See ECF No.
 12 35-1 at 9. The rationale the Department set forth in its individual determination letter to Ms.
 13 Craig, within the context of the Department's larger reassessment of the value of a Corinthian
 14 education, thus sets forth a reasonable explanation for the Department's decision, and provides
 15 assurance that it did not "depart[] irrationally from its prior decisions." *Cal. Trout*, 572 F.3d at
 16 1023. As noted above, the Department retains discretion to award appropriate relief for borrower
 17 defense claims, including to award partial discharges, and has created no binding rule of decision
 18 requiring it to award a full discharge in all cases. In light of that framework, its determination
 19 to offset Ms. Craig's discharge based on the value of her education received, a result
 20 contemplated by the governing regulation, is not an arbitrary departure, and the rationale set
 21 forth justifying the partial discharge is sufficient to satisfy the agency's minimal burden under
 22 the APA. See, e.g., *Alaska Oil & Gas Ass'n v. Jewell*, 815 F.3d 544, 554 (9th Cir. 2016) (APA's
 23 "arbitrary and capricious" standard establishes a "high threshold" for setting aside agency action,
 24 pursuant to which such action is "presumed valid and is upheld if a reasonable basis exists for
 25 the decision," and a court "must not substitute its judgment for that of the agency").

26 **B. Plaintiffs Are Not Likely To Succeed In Establishing That The**
 27 **Department Conducted Impermissibly Retroactive Rulemaking**

28 Plaintiffs' next claim that the Department's "application of the Average Earnings Rule,
 instead of the Corinthian Job Placement Rate Rule, constitutes illegal retroactive rulemaking."

1 PI Mot. at 28. As discussed above, however, the December Press Release is not the type of final
 2 agency action that is subject to review under the APA. And in any case, the policy it announces
 3 does not operate retroactively, much less impermissibly so. *See Bowen v. Georgetown Univ.*
 4 *Hosp.*, 488 U.S. 204, 208 (1988) (“statutory grant of *legislative rulemaking authority* will not,
 5 as a general matter, be understood to encompass the power to *promulgate retroactive rules* unless
 6 that power is conveyed by Congress in express terms” (emphasis added)).

7 On its face, the partial discharge policy for awarding relief on borrower defense claims
 8 operates prospectively, providing that “remaining pending claims will be adjudicated
 9 systematically under the newly announced discharge process.” December Press Release. This
 10 change in the process¹⁸ the Secretary employs to award discretionary relief under a statutory and
 11 regulatory scheme that sets forth no standards to guide that discretion does not operate
 12 retroactively because it does not “alter the *past* legal consequences of past actions.” *Nat’l*
 13 *Medical Enters., Inc. v. Sullivan*, 957 F.2d 664, 671 (9th Cir. 1992) (quoting *Bowen*, 488 U.S. at
 14 219) (Scalia, J., concurring)). For the press release to have had retroactive effect, Plaintiffs
 15 would need either (1) to claim a “vested right[.]” in receiving full discharge in advance of the
 16 Department’s December announcement or (2) to show that some *past* legal consequence has
 17 resulted from that announcement. *See Landgraf v. USI Film Prods.*, 511 U.S. 244, 269-70 (1994)
 18 (rule operatives “retrospectively” where it “takes away or impairs vested rights acquired under
 19 existing laws, or creates a new obligation, imposes a new duty, or attaches a new disability, in
 20 respect to transactions or considerations already past” (citation omitted)).

21 Neither is true. As discussed above, Plaintiffs cannot claim any “vested right” in a
 22 particular form of relief (as alleged here, full discharge) based on a successful borrower defense.
 23 The governing regulation vests discretion in the Secretary to grant either full or partial
 24 discharges, as well as complete discretion to fashion such other relief as she deems appropriate.
 25 *See Fernandez-Vargas v. Gonzales*, 548 U.S. 30, 44 n.10 (2006) (the term “vested rights,” in the

26
 27 ¹⁸ Plaintiffs argue the Court should evaluate the appropriateness of the Department’s retroactive
 28 application of the “Corinthian Job Placement Rate Rule” under a five-prong test. *See* PI Mot. at
 28 28. But the Court does not need to reach this analysis, because Plaintiffs have not actually
 alleged that any agency determination is being retroactively applied.

retroactivity analysis, “describes something more substantial than inchoate expectations and unrealized opportunities[;]” rather, it describes “an immediate fixed right of present or future enjoyment”); *cf. Bloch v. Powell*, 348 F.3d 1060, 1069 (D.C. Cir. 2003) (“[W]hen a statute leaves a benefit to the discretion of a government official, no protected property interest in that benefit can arise.”). And, as discussed above, neither has the Department, through its prior practice of adjudication, taken definitive action to cabin that discretion or make the binding, “prospective[] determin[ation] that all class members” – including those on whose applications the Department had not yet acted and those who have not yet submitted applications – are “entitled to [full] relief.” PI Mot. at 29. *See, e.g., Brock v. Cathedral Bluffs Shale Oil Co.*, 796 F.2d 533, 537 (D.C. Cir. 1986) (“An agency pronouncement is not deemed a binding regulation merely because it may have ‘some substantive impact,’ as long as it ‘leaves the administrator free to exercise his informed discretion.’” (citation omitted)). Likewise, the only legal consequence attached to this determination is the amount of discharge that a borrower can expect to receive and what repayment obligations will exist going forward. *See Nat’l Medical Enters.*, 957 F.2d at 671 (in general, an effect on the “future legal consequences of past transactions” is “an entirely lawful consequence of much agency rulemaking”); *R.T. Vanderbilt Co. v. Babbitt*, 113 F.3d 1061, 1067 (9th Cir. 1997) (no retroactive effect where agency determination, even as applied to pending claims, affects only the applicant’s “prospective interest” in the outcome of the claim).

Plaintiffs’ reliance on *Cort v. Crabtree*, 113 F.3d 1081 (9th Cir. 1997), actually underscores this point because, as Plaintiffs recognize, *see* PI Mot. at 28-29, its retroactivity analysis turned on the government applying a new rule to reverse course on an eligibility determination it had already made. In particular, the Bureau of Prisons (“BOP”) sent the plaintiffs notifications indicating that they were eligible for a discretionary sentence reduction available to prisoners convicted of “nonviolent offenses” who successfully completed a substance abuse treatment program. *Cort*, 113 F.3d at 1082. Subsequently, BOP updated its definition of “nonviolent offense,” applied that definition to the plaintiffs, and notified them that they were no longer eligible for the sentence reduction. *Id.* at 1083. The Ninth Circuit determined that it was impermissible to apply this new definition retroactively to the plaintiffs

1 because BOP had already “determine[d] prospectively” that they were eligible for the sentence
 2 reduction, creating a “right” to “*consideration* for early release.” *Id.* at 1085. Nothing in the
 3 court’s decision suggests that had BOP not sent these notifications to the plaintiffs, but had sent
 4 eligibility notifications to other similarly situated prisoners, that would have sufficed to preclude
 5 BOP’s applying the new policy to the plaintiffs.

6 This decision is inapposite because the Department has not denied Plaintiffs any
 7 opportunity to seek a full discharge of their loans based on a borrower defense to repayment; nor
 8 has it made a final determination that all Corinthian borrowers are no longer eligible for full
 9 discharges. Because this is not a case where Defendants retroactively determined that the
 10 Plaintiffs, whose eligibility to seek relief they had already confirmed, can no longer be
 11 considered for discretionary relief, applying the new methodology to govern the amount of relief
 12 available imposes no retroactive effect. *See Torres v. Chater*, 125 F.3d 166, 170 (3d Cir. 1997)
 13 (finding, in response to argument against retroactive application of a rule to deny a claimed right
 14 to a future government benefit that can be terminated at any time by statute, that “it follows that
 15 an applicant who has never been declared eligible may as well be deprived of an inchoate right”).

16 **C. Plaintiffs Have Not Established That Their Section 706(1) Claims Are Likely**
 17 **To Succeed**

18 A claim under the APA to compel agency action, whether unlawfully withheld or
 19 unreasonably delayed, can proceed “only where a plaintiff asserts that an agency failed to take a
 20 *discrete* agency action that it is *required* to take.” *SUWA*, 542 U.S. at 64. “The agency action
 21 must be pursuant to a legal obligation ‘so clearly set forth that it could traditionally have been
 22 enforced through a writ of mandamus.’” *Vietnam Veterans of Am. v. CIA*, 811 F.3d 1068, 1075-
 23 76 (9th Cir. 2015) (citation omitted); *see also Barron v. Reich*, 13 F.3d 1370, 1374 (9th Cir.
 24 1994) (“A writ of mandamus is appropriately issued only when (1) the plaintiff’s claim is ‘clear
 25 and certain’; (2) the defendant official’s duty to act is ministerial, and ‘so plainly prescribed as
 26 to be free from doubt’; and (3) no other adequate remedy is available.”). In the absence of such
 27 a command to carry out “a ministerial or non-discretionary act,” about which the agency has “no
 28 discretion whatever,” *SUWA*, 542 U.S. at 63-64, agency action cannot be deemed “*unlawfully*

1 withheld,” *id.* at 63, or “unreasonably delayed,” *id.* at 63 n.1. In light of these statutory
 2 commands, when presented with an unreasonable delay claim, “a court does not reach the
 3 question of whether a delay was unreasonable until it has found that the agency has failed to take
 4 a discrete, non-discretionary action.” *Cloverdale Rancheria of Pomo Indians of Cal. v. Salazar*,
 5 2011 WL 1883196, at *3 (N.D. Cal. May 17, 2011) (citing *SUWA*, 542 U.S. at 63 n.1).

6 Plaintiffs allege that the Department has both unlawfully withheld and unreasonably
 7 delayed “relief [due] under the Corinthian Job Placement Rate Rule,” (*i.e.*, “full loan
 8 discharge,”), PI Mot. at 42-43 (“Not only has the Department unlawfully withheld [full] relief,
 9 but it has done so for an unreasonable period of time.”); *id.* at 44. Thus, the specific agency
 10 action that Plaintiffs seek to compel, through both Section 706(1) claims, is the granting of “full
 11 loan discharge to [all] individuals” who “submitted an attestation form establishing that they fell
 12 into one of the findings cohorts.” *Id.* at 43. But that action, potentially applicable to thousands
 13 of as-yet unidentified Corinthian borrowers is not *discrete*. *SUWA*, 542 U.S. at 64 (discrete
 14 agency action requirement precludes a “broad programmatic attack”). Nor is the Department in
 15 any sense “required” to award full discharge of any loan based on a borrower’s defense to
 16 repayment. Accordingly, Plaintiffs have not established their entitlement to the extraordinary
 17 remedy they seek, much less their entitlement to such a *mandatory* injunction in the present
 18 *preliminary* proceeding. *See Taiebat*, 2017 WL 747460, at *3 (request, under Section 706(1) for
 19 mandatory injunction adjusting immigration status “not ‘temporary’ or ‘preliminary’” and is
 20 “inappropriate . . . at the preliminary-injunction stage” (citations omitted)).

21 Defendants are under no mandatory duty to award any particular relief based upon a
 22 successful borrower defense claim. To the contrary, the HEA merely directs the Secretary to
 23 specify “which acts or omissions of an institution of higher education a borrower may assert as
 24 a defense to repayment,” and the regulations promulgated thereunder grant the Secretary
 25 discretion to determine the measure of relief appropriate upon a borrower’s assertion of a
 26 successful defense to repayment. Moreover, as discussed above, the Department has not
 27 otherwise established a mandatory duty to award particular relief through its informal
 28 announcements and past treatment of borrower defense claims, which do not carry the force of

law with respect to future adjudications. *See Vietnam Veterans of Am.*, 811 F.3d at 1081 (“We recognize that the operation of § 706(1) is restricted to discrete actions that are *unequivocally compelled by statute or regulation.*” (emphasis added)); *Ctr. for Biological Diversity v. Zinke*, 260 F. Supp. 3d 11, 21 (D.D.C. 2017) (noting that while source of “law” creating mandatory duty necessary to sustain a Section 706(1) claim need not be a statute, it is limited to “agency regulation that ha the force of law” (quoting *SUWA*, 542 U.S. at 64)). Because a court, in response to a Section 706(1) claim, cannot compel action “not clearly mandated” by law, *Hells Canyon Pres. Council*, 593 F.3d at 933, Plaintiffs cannot compel the Department to award them their preferred relief for their asserted defenses to repayment. *See CREW v. SEC*, 916 F. Supp. 2d 141, 148-49 (D.D.C. 2013) (“If the duty requires a ‘ministerial or non-discretionary act,’ a court may order the agency to take that specific action, but if the duty is simply to ‘take action upon a matter’ but ‘the manner of its action is left to the agency’s discretion,’ the court ‘has no power to specify what the action must be.’” (quoting *SUWA*, 542 U.S. at 64-65)).

D. Plaintiffs Have Not Established That They Are Likely To Succeed On Their Privacy Act Claim

Plaintiffs’ Privacy Act claim is premised on their contention that Defendants “are rendering decisions about individual borrower defense applications in violation of the Privacy Act’s restrictions on Matching Programs,” Am. Compl. ¶ 298, and in particular seeks preliminary relief based on asserted violations of 5 U.S.C. § 552a(o)-(p), (r)-(u). PI Mot. at 3. As a remedy, Plaintiffs request that the Court “declare that the Department’s Average Earnings Rule violates the Privacy Act,” and, accordingly, set aside that “rule.” See Am. Compl. at 56, Prayer for Relief (E-I). Plaintiffs’ claim fails for two reasons. First, Plaintiffs’ requested declaratory and injunctive relief is not available under the Privacy Act’s comprehensive remedial scheme, which also precludes Plaintiffs from seeking such relief under the APA. Second, in any event, Plaintiffs have not demonstrated a likelihood of success on the merits because the Department’s agreement with SSA is not a “matching program,” as defined by the Privacy Act.

1. The Injunctive Relief Plaintiffs Seek Is Not Available Under The Privacy Act Or The APA

The Privacy Act provides “comprehensive private remedies for unwarranted disclosures

of personal information.” *Dittman v. California*, 191 F.3d 1020, 1028 (9th Cir. 1999) (quoting *Polchowski v. Gorris*, 714 F.2d 749, 752 (7th Cir. 1983)); *see also* *Wilson v. Libby*, 535 F.3d 697, 703 (D.C. Cir. 2008). This “comprehensive remedial scheme,” *Libby*, 535 F.3d at 703, authorizes injunctive relief in only two specific circumstances: (1) to order an agency to amend inaccurate, incomplete, irrelevant, or untimely records, and (2) to order an agency to allow an individual access to his records – neither of which applies here. As the Ninth Circuit and other circuits have held, a plaintiff cannot seek other equitable relief for any Privacy Act violation, including under the catchall provision set out at 5 U.S.C. § 552a(g)(1)(D), which provides for civil remedies when an agency “fails to comply with any other provision of [the Privacy Act.]” *See Cell Assocs., Inc. v. Nat’l Inst. of Health*, 579 F.2d 1155, 1161 (9th Cir. 1978) (“[W]e think it plain that Congress limited injunctive relief to the situations described in 5 U.S.C. § 552a(g)(1)(A) and (2) and (1)(B) and (3).”); *see also* *Doe v. Stephens*, 851 F.2d 1457, 1463 (D.C. Cir. 1988); *Edison v. Dep’t of the Army*, 672 F.2d 840, 846-47 (11th Cir. 1982).

These holdings are consistent with the principle that “[w]here . . . [a] ‘statute provides for certain special types of equitable relief but not others, it is not proper to imply a broad right to injunctive relief.’” *Parks v. IRS*, 618 F.2d 677, 684 (10th Cir. 1980) (citing *Cell Assosc.*, 579 F.2d at 1161-62). This is especially true with the Privacy Act because Congress “link[ed] particular violations of the Act to particular remedies in a specific and detailed manner[.]” which “points to a conclusion that Congress did not intend to authorize the issuance of [other] injunctions.” *Cell Assocs.*, 579 F.2d at 1159. Indeed, were other injunctive relief available for violations of the Privacy Act generally, “the detailed remedial scheme adopted by Congress would make little sense. We think it unlikely that Congress would have gone to the trouble of authorizing equitable relief for two forms of agency misconduct and monetary relief for all other forms if it had intended to make injunctions available across the board.” *Id.* at 1160. Accordingly, Plaintiffs’ requests for declaratory and injunctive relief should be rejected.

Nonetheless, Plaintiffs assert that “[i]njunctive relief is available under the APA to force compliance with the Privacy Act.” PI Mot. at 31. Not so. While the APA generally waives the federal government’s immunity from a lawsuit, 5 U.S.C. § 702, that waiver “comes with an

important carve-out[.]” *Match-E-Be-Nash-She-Wish Band of Pottawatomí Indians v. Patchak*, 567 U.S. 209, 215 (2012). It “does not ‘confer authority to grant relief if any other statute that grants consent to suit expressly or impliedly forbids the relief which is sought.’” *City of Oakland v. Lynch*, 798 F.3d 1159, 1165 (9th Cir. 2015) (quoting 5 U.S.C. § 702). “That provision prevents plaintiffs from exploiting the APA’s waiver to evade limitations on suit contained in other statutes.” *Patchak*, 567 U.S. at 215; *see also Block v. N.D. ex rel. Bd. of Univ. & Sch. Lands*, 461 U.S. 273, 286 & n.22 (1983). “When Congress has dealt in particularity with a claim and has intended a specified remedy – including its exceptions – to be exclusive, that is the end of the matter; the APA does not undo the judgment.” *Patchak*, 567 U.S. at 216 (citation omitted).

Plaintiffs’ claim to relief under the APA is entirely derivative of the asserted Privacy Act violation. *See, e.g.*, PI Mot. at 31 (arguing that the “Average Earnings Rule” violates the APA “because” it violates the Privacy Act). But they may not use the APA to obtain types of relief for alleged Privacy Act violations that Congress has not made part of that statute’s comprehensive remedial scheme. Following these principles, numerous federal courts have held that the Privacy Act precludes injunctive relief under the APA, and thus a plaintiff cannot bring an APA claim to obtain injunctive relief for an alleged Privacy Act violation. *See, e.g., Echols v. Morpho Detection, Inc.*, 2013 WL 1501523, at *2-3 (N.D. Cal. Apr. 11, 2013); *Ware v. U.S. Dep’t of Interior*, 2006 WL 1005091, at *3 (D. Or. Apr. 14, 2006); *Westcott v. McHugh*, 39 F. Supp. 3d 21, 33 (D.D.C. 2014); *Mittleman v. U.S. Treasury*, 773 F. Supp. 442, 449 (D.D.C. 1991); *Diaz-Bernal v. Myers*, 758 F. Supp. 2d 106, 119 (D. Conn. 2010).¹⁹

Finally, Plaintiffs cannot rescue their Privacy Act claim by pointing to the Supreme Court’s dicta in *Doe v. Chao*, 540 U.S. 614, 619 n.1 (2004). *See* PI Mot. at 31 n.11. *Chao* was

¹⁹ Plaintiffs cite *Doe v. Stephens*, 851 F.2d 1457 (D.C. Cir. 1988) in support of their claim that injunctive relief is available under the APA, PI Mot. at 31, but the circumstances in that case are distinguishable. Notably, while the court concluded that a plaintiff could be awarded injunctive relief for a statutory violation under the APA, the statute at issue was not the Privacy Act, but rather the Veterans’ Records Statute. *Stephens*, 851 F.2d at 1467. And Plaintiffs do not mention is that the *Doe* court explicitly recognized that injunctive relief was not available for a *Privacy Act* violation absent the specific circumstances set out in the statute. *Id.* at 1463. *See also Sussman v. U.S. Marshals Serv.*, 494 F.3d 1106, 1122 (D.C. Cir.2007) (noting that *Doe* held that “only monetary damages ... are available to § 552a(g)(1)(D) plaintiffs.”)

1 a case about monetary damage and, as Plaintiffs recognize, the Court did not need to reach, and
 2 thus did not reach, the issue of whether equitable relief was otherwise available. As discussed
 3 above, the Supreme Court has since made clear that a detailed remedial scheme, such as that
 4 provided by the Privacy Act, preempts alternative remedies, *see Patchak*, 567 U.S. at 215-17,
 5 and that directive should control here rather than any “speculat[ive]” dicta. PI Mot. at 31 n.11.

6 2. Plaintiffs Are Not Otherwise Entitled To Relief Under the Privacy Act

7 Plaintiffs’ Privacy Act claim also fails on the merits because it is entirely dependent upon
 8 their allegations that the Department’s use of earnings data from the SSA constitutes a “matching
 9 program.” *See* PI Mot. at 32; Am. Compl. ¶ 298. But this is not the case. The partial discharge
 10 methodology that Plaintiffs seek to challenge, which simply produces aggregate statistical data
 11 of the earnings at relevant Corinthian programs and has only incidental effects on individual
 12 borrowers based on their membership within the group of students whose earnings are assessed,
 13 does not rely on information compared through a matching program.

14 Plaintiffs rely on provisions of the Privacy Act enacted pursuant to the Computer
 15 Matching and Privacy Protection Act of 1988, which “establish[ed] procedural safeguards
 16 affecting agencies’ use of Privacy Act records in performing certain types of computerized
 17 matching programs.” OMB Guidance, 54 Fed. Reg. 25,818-01, 25,818 (June 19, 1989). The
 18 Privacy Act expressly excludes from its “matching program” definition several types of
 19 “matches” between computerized information contained in agencies’ systems of records. Most
 20 pertinent here, it excludes “matches performed to produce aggregate statistical data without any
 21 personal identifiers.” 5 U.S.C. § 552a(a)(8)(B)(i). OMB has clarified that this exclusion does
 22 not require that the “data bases used in the match must be stripped *prior to* the match”; only that
 23 the ultimate results of the match “not contain individually identifiable data.”²⁰ 54 Fed. Reg.
 24 25,823 (emphasis added). As discussed above, SSA provides the Department with “certain
 25 aggregate earnings information, in a form that cannot be associated with, or otherwise identify,
 26 directly or indirectly, a particular individual.” Earnings Data Agreement at 1 (ECF No. 35-8 at

27 ²⁰ It is well-established that OMB guidance documents implementing the Privacy Act “are owed
 28 the deference usually accorded interpretation of a statute by the agency charged with its
 administration.” *Baker v. Dep’t of Navy*, 814 F.2d 1381, 1383 (9th Cir. 1987) (citation omitted).

42). As such, as the agreement itself recognizes, the “information exchange” between the two agencies “is not a ‘matching program’ as that term is defined in the Privacy Act.” *Id.*

Plaintiffs correctly point to OMB’s guidance that although the statutory text contains no further limitations, it includes the “implicit” restriction that aggregate statistical data matches not be “done to take action against specific individuals.” *See* PI Mot. at 32-33 (citing 54 Fed. Reg. 25,823). But while Plaintiffs acknowledge that OMB further recognized that “the statistical inferences drawn from the data may have consequences for the subject of the match as members of a class or group” and still be excluded from the Act’s definition of a “matching program,” *id.* at 33 n.12 (citing 54 Fed. Reg. 25,823), they do not analyze how that applies here.

This is in fact precisely what is happening here. As discussed above, the Department extracted certain identifying information from groups of students at relevant Corinthian programs, grouped according to the program they attended and the credential they received. Methodology Memo at 3; *see also* Earnings Data Agreement at 2 (ECF No. 35-8 at 43). The Department requested mean and median income data for 79 “Corinthian Program/Credential Groups,” and SSA provided this program-level information, without any personal identifiers or earnings information about specific, individual students. Methodology Memo at 3; Earnings Data Agreement at 3 (ECF No. 35-8 at 44) (describing process by which SSA produces earnings data to the Department in a form “that cannot be associated with, or otherwise identify, directly or indirectly, a particular individual”).

The Department then used the aggregate statistical data to determine the value of the education provided at each of the Corinthian programs for which the Department sought earnings data for the year 2014. In particular, the Department compared that average earnings information with earnings information that is part of “gainful employment” data for comparable non-Corinthian programs in order to assess the value of the education received at particular Corinthian programs. Methodology Memo at 3. Based on that calculation, the Department determined a common percentage of discharge offset for the associated federal student loans for all borrowers within each particular program at an academic credential level, as a calculation of the actual harm the borrowers suffered from attending that program in reliance on the subject

1 school's misrepresentations under state law. The Department's process for discharging
 2 outstanding loan balances based on successful borrower defenses going forward will thus parallel
 3 the manner in which it has recognized the existence of valid defenses to date. Just as that initial
 4 determination was based on misconduct at entire Corinthian programs, and the individual
 5 borrowers' attestations that they attended a covered program and relied on that misconduct, so
 6 too will the ultimate remedy be calculated at the program level. That the Department used
 7 aggregate statistical data from SSA, devoid of any personal identifiers, to answer this objective
 8 question (*i.e.*, the educational value that each Corinthian program provided) does not violate the
 9 Privacy Act because any consequence it had on individual borrowers was based only on
 10 "statistical inferences" that applied to the borrowers only as "members of [the] class or group"
 11 of students that attended the relevant Corinthian program. 54 Fed. Reg. at 25,823.

12 **E. Plaintiffs Fail To Show That The Department's Discretionary Review Of**
 13 **Borrower Defense Applications Violates Due Process Rights**

14 Plaintiffs' Due Process claim is similarly unlikely to succeed. To establish a violation of
 15 procedural due process a plaintiff must demonstrate: (1) a deprivation of a constitutionally
 16 protected liberty or property interest, and (2) a denial of adequate procedural protections. *Tutor-*
 17 *Saliba Corp. v. City of Hailey*, 452 F.3d 1055, 1061 (9th Cir. 2006). In evaluating whether the
 18 Government has provided adequate procedural protections, the Court considers, (1) the private
 19 interest that will be affected by the official action; (2) the risk of an erroneous deprivation of
 20 such interest through the procedures used, and the probable value, if any, of additional or
 21 substitute procedural safeguards; and (3) the Government's interest, including the fiscal and
 22 administrative burdens that additional or substitute procedural requirements would entail.
 23 *Mathews v. Eldridge*, 424 U.S. 319, 321 (1976). Due process "is not a technical conception with
 24 a fixed content unrelated to time, place, and circumstances." *Gilbert v. Homar*, 520 U.S. 924,
 25 930 (1997) (citation omitted). Instead, due process procedures may vary "depending upon the
 26 importance of the interests involved and the nature of the subsequent proceedings." *Cleveland*
 27 *Bd. Of Educ. v. Loudermill*, 470 U.S. 532, 545 (1985) (quoting *Boddie v. Connecticut*, 401 U.S.
 28 371, 378 (1971)). At bottom, the due process evaluation "is flexible and calls for such procedural
 protections as the particular situation demands." *Buckingham v. Sec'y of U.S. Dep't of Agric.*,

603 F.3d 1073, 1083 (9th Cir. 2010) (quoting *Mathews*, 424 U.S. at 334).

Because Plaintiffs have not established the deprivation of any property interest, and in any event the process provided was adequate, their claim is not likely to succeed.

1. Plaintiffs Fail To Establish A Deprivation Of A Property Interest That Would Trigger Procedural Due Process

A threshold requirement to a substantive or procedural due process claim is the plaintiff's showing of a liberty or property interest protected by the Constitution. *Bd. of Regents of State Colls. v. Roth*, 408 U.S. 564, 569 (1972); *Kraft v. Jacka*, 872 F.2d 862, 866 (9th Cir. 1989). To claim a property interest in a particular benefit, a plaintiff must have "a legitimate claim of entitlement to," as opposed to "a unilateral expectation of," the benefit. *Roth*, 408 U.S. at 577. "This typically requires an individual to demonstrate that an existing law, rule, or understanding makes the conferral of a benefit mandatory." *United States v. Guillen-Cervantes*, 748 F.3d 870, 872 (9th Cir. 2014) (citation omitted). Plaintiffs' claim is not likely to succeed because they fail to demonstrate a protected property interest in any particular amount of loan forgiveness.

As an initial matter, Plaintiffs fail to identify with clarity the property interest that has allegedly been deprived. *Compare* PI. Mot. at 35 (asserting that plaintiffs have "a property interest in the outcome of their borrower defense application"), *with id.* at 39 (discussing an individual's "right to a full discharge"). Such indeterminacy about the nature of the alleged property interest undermines any argument that it is constitutionally significant. *See Allison v. Shabazz*, 2016 WL 2957121, at *6 (N.D. Cal. May 23, 2016) (dismissing case because "it is still unclear what liberty or property interest [plaintiff] alleges she was deprived"). Imprecision aside, what Plaintiffs ultimately assert they are being deprived of is their preferred level of relief, *i.e.*, full discharge under the "Corinthian Job Placement Rule." Because the Secretary retains the discretion to "grant or deny [such relief] in [her] discretion," Plaintiffs have not, and cannot, establish that they have a constitutionally protected property interest in having their federal loans discharged. *Town of Castle Rock v. Gonzales*, 545 U.S. 748, 756 (2005).

Plaintiffs first claim that such property interest is based on "the statutory and regulatory standards entitling individuals to a loan discharge once they satisfy the elements of the regulation." PI Mot. at 36. While Plaintiffs are correct that legislative enactments may create a

property interest, they conveniently ignore that such interests are only created if the relevant statute or regulation *mandates* that a benefit will be provided whenever specific non-discretionary factual criteria are met, and the statute or regulation must contain “‘particularized standards or criteria’” to create such a property interest. *Doyle v. City of Medford*, 606 F.3d 667, 673 (9th Cir. 2010) (citation omitted). As discussed above, neither the HEA nor the borrower defense regulation set forth any particular standards making any particular award of relief based upon a successful borrower defense mandatory, and instead confer discretion upon the Secretary to discharge a borrower’s loan obligation in full or in part, and to afford such other discretionary relief as she deems appropriate.²¹ See 20 U.S.C. § 1087e(h); 34 C.F.R. § 685.206(c).

Recognizing that the requisite mandatory language is absent here, Plaintiffs’ try to cobble together an “entitlement” (in the same way they attempted to conjure a “rule” entitling them to the same full discharge remedy) based on various aspects of the purported “Corinthian Job Placement Rate Rule.” PI Mot. at 36. But as discussed above, no such “rule” exists entitling Plaintiffs to the full discharge they seek, and, for the same reasons, they can claim no constitutionally cognizable property interest in the various public statements and adjudications allegedly giving rise to that rule. The Department at most established that Corinthian borrowers who fall within the Department’s findings would be entitled to *some* relief from, including *some* amount of discharge of, their loans. Within a regulatory scheme that expressly provides for the Secretary to discharge a borrower’s repayment obligation either in full or in part, these outreach efforts, which promise no particular amount of discharge, cannot establish Plaintiffs’ entitlement to full discharge. See *supra* p. 7 (summarizing ED’s various statements and outreach efforts, which reference “relief,” “discharge,” or “forgiveness” in unspecified amounts).

Finally, the Department’s alleged “consistent application” of full discharges does not create a cognizable property interest because “a government body’s past practice of granting a government benefit is insufficient to establish a legal entitlement to that benefit.” *Gerhart v. Lake Cty.*, 637 F.3d 1013, 1021 (9th Cir. 2011); see also *Stevens Cty. v. U.S. Dep’t of Interior*,

²¹ This situation is thus distinguishable from the examples Plaintiffs present, see PI Mot. at 39, which involve statutorily mandated benefits like Social Security and Medicare payments.

507 F. Supp. 2d 1127 (E.D. Wash. 2007) (declining to recognize alleged property interest in grazing permits, even though plaintiffs alleged certain grazing permits have been *consistently renewed* for more than 60 years). “A constitutional entitlement cannot be created – as if by estoppel – merely because wholly and *expressly* discretionary state privilege has been granted generously in the past.” *Conn. Bd. of Pardons v. Dumschat*, 452 U.S. 458, 465 (1981).²²

Plaintiffs reference only one case in support of their purported property interest: *Higgins v. Spelling*, 663 F. Supp. 2d 788 (W.D. Mo. 2009). But at issue there was a provision of the HEA that *required* the Secretary, upon a borrower’s death or disability, to discharge the borrower’s liability on a loan. *See* 20 U.S.C. § 1087 (emphasis added). Applicable regulations provided that, upon satisfaction of certain delineated criteria, the loan *is* “conditionally discharged” for up to three years. *Higgins*, 663 F. Sup. 2d at 792 (citing 34 C.F.R. § 685.213(a)(1)). Based on the mandatory statutory language and clearly defined criteria, the court found an “expectation” in discharge for an individual who meets the eligibility requirements. *Id.* at 794. Because the plaintiffs were initially determined to be permanently and totally disabled, and were notified of this determination, the court found a protected property right.

Here, on the other hand, neither the statute nor regulation contains mandatory language requiring the Department to completely discharge a loan if the borrower meets certain delineated criteria. Moreover, other courts have confirmed that *Higgins* should be limited to its facts. *See, e.g., Washington v. Duncan*, 2016 WL 324989 (E.D. Wis. Jan. 26, 2016); *Konashenko v. Duncan*, 2016 WL 4543793, at *6 n.3 (E.D.N.Y. July 20, 2016) (while *Higgins* “acknowledged that a property interest *may* exist in a borrower’s right to be discharged from his or her student loans [based on disability discharge provisions]” that may only be applicable where a borrower had already been personally notified by the Department “that he satisfied the criteria for a

²² The Department is granted significant discretion under the regulatory framework to award appropriate relief based on borrower defenses to repayment, and has not taken definitive action to cabin that discretion, undercutting Plaintiffs’ claim that the Department’s actions have created a cognizable property interest in full discharges. *See Howard v. City of Coos Bay*, 2011 WL 899619, at *8 (D. Or. Mar. 14, 2011) (no property interest in job where employee handbook or personnel policy includes disclaimer that employment is at will).

1 disability discharge” (emphasis added)).

2 Because Plaintiffs have not shown that they have been deprived of any property interest,
3 the Court can end its inquiry: the due process claim is not likely to succeed.

4 2. Plaintiffs Do Not Establish A Risk Of Erroneous Deprivation

5 Even if Plaintiffs had a cognizable property interest in the discharge of the full amount
6 of their federal student loans, they have not shown that the Defendants are infringing that right
7 without providing adequate procedural protections. Specifically, they have not demonstrated the
8 risk of an erroneous deprivation of such interest through the procedures the Department uses, or
9 the probable value, if any, of additional procedural requirements. *See Mathews*, 424 U.S. at 321.

10 To the extent the putative deprivation at the heart of Plaintiffs’ due process claim is the
11 Department’s granting partial, as opposed to full, discharges of certain borrowers’ student loans,
12 Plaintiffs do not establish a likelihood that any particular class members have received such a
13 partial discharge. Under the Department’s improved relief methodology, borrowers still qualify
14 for full discharges where they attended Corinthian programs whose former attendees’ earnings
15 are 1% to 49% of the earnings of completers of a comparable, passing gainful employment
16 program. *See* December Press Release. Plaintiffs ignore this fact and fail to establish why
17 borrowers who have not yet received determinations on their borrower defense applications are
18 more likely to receive partial, rather than full, discharges. That Plaintiffs identify two borrowers
19 who received a partial discharge, without further information about which CCI programs *other*
20 putative class members attended, does not prove that other deprivations of the putative property
21 interest are likely. *See Mathews*, 424 U.S. at 344 (“[P]rocedural due process rules are shaped by
22 the risk of error inherent in the truthfinding process as applied to the generality of cases, not the
23 rare exceptions.”); *Walters v. Nat’l Ass’n of Radiation Survivors*, 473 U.S. 305, 330 (1985).

24 Moreover, Plaintiffs have not established that the additional processes they seek would
25 minimize any risk of erroneous deprivation. With respect to information from ED about how
26 the borrowers’ information would be used, PI Mot. at 36, Plaintiffs do not specify what
27 information they seek and how it would minimize the risk of erroneous partial discharge. In any
28 event, the attestation forms already contain information about how the Department might use

information provided thereon. *See, e.g.*, Attestation Forms, *supra* p.7 n. 7 (“information in your file may be disclosed, on a case-by-case basis or under a computer matching program”). And with respect to the information that Plaintiffs would have the Department provide regarding its evaluation of claims, PI Mot. at 36, Plaintiffs similarly fail to offer any explanation for how such information would minimize the risk of erroneous deprivation. The conclusory argument that the Department “precluded members from providing additional evidence with their attestation forms that *might* have impacted the Department’s decision-making,” PI Mot. at 38 (emphasis added), is too speculative to establish a likelihood of success on the merits, especially given that those forms expressly invite borrowers to submit “any other information” about their experience at CCI programs that they “believe is relevant.” Attestation Forms.

Plaintiffs also assert that the Department’s procedure makes it difficult for them to challenge partial discharge determinations and “offer a contrary presentation” of evidence. PI Mot. at 37. But Plaintiffs overstate what is constitutionally required. The Department need only provide information “sufficient to permit each [p]laintiff to respond meaningfully” to the putative deprivation, and is not required to provide all data underlying its calculations and determination. *See, e.g. Latif v. Lynch*, 2016 WL 1239925, at * 14 (D. Or. Mar. 28, 2016); *Buchanon v. Prudential Ins. Co. of Am.*, 2016 WL 4087233, at *4 (E.D. Mich. Aug. 2, 2016). In any event, notices like the one received by plaintiff Jennifer Craig are sufficient to permit the plaintiff to meaningfully respond. As noted above, *supra* p. 27, that notice explains that the determination is based on the value of the education received at CCI, as determined by a comparison of aggregate average earnings data for students who attended the program with aggregate average earnings data for students who completed comparable GE programs. *See* ECF No. 35-1. To the extent a borrower believes that this information is inaccurate or that the Department made a mistake, for example, in assigning her to a particular program, the notification offers an email address and phone number to raise this issue.²³ *See id.*

²³ Plaintiffs argument that due process is absent because the notices “fail to appraise individuals of their right to appeal” and “misleadingly impl[y] that the decision is final,” PI Mot. at 38, n.13, is undercut by the notice itself, which explicitly provides that “If you have questions about

1 Plaintiffs do not establish that they are entitled to anything else. They cite no binding
 2 authority requiring the Department to provide additional information, relying instead on a
 3 footnote, *see* PI Mot. at 37-38 (citing *Bowman Transp. Inc. v. Ark-Best Freigh Sys., Inc.*, 419
 4 U.S. 281, 288 n.4 (1974)) and a non-binding Second Circuit opinion, *Kapps v. Wing*, 404 F.3d
 5 105, 123-24 (2d Cir. 2005), in which the court explicitly recognized that “the specific type of
 6 notice required will vary depending on the circumstances of each given case” and “what [is]
 7 constitutionally required in one context, may not be in another.” The court ordered a more
 8 detailed notice of benefit determination because it found that such a notice would not be unduly
 9 burdensome. *Id.* at 124. But here, as described above, some of the requested information is
 10 already provided and the provision of other information that Plaintiffs seek may be prohibited
 11 by law. *See* 5 U.S.C. § 552a(b); 20 U.S.C. § 6103(a); 20 U.S.C. § 1015c (provisions that
 12 Plaintiffs allege forbid the Department from releasing the individual income data that its
 13 decisions are built on); *Latif*, 2016 WL 1239925, at * 13 (additional notice not required where it
 14 would unduly jeopardize other government interests).²⁴

15 Plaintiffs’ final alleged procedural deficiency – that the Department errs in not soliciting
 16 information from individual borrowers about their earnings and instead relying on third-party
 17 data – also does not show a serious risk of erroneous deprivation. In this Circuit, individualized
 18 determination are *not* always required. *See, e.g., United States v. Strong*, 489 F.3d 1055, 1063
 19 (9th Cir. 2007) (rejecting plaintiff’s argument that statute was unconstitutional because it
 20 required mandatory result without giving the court an opportunity to assess the defendant’s
 21 individualized circumstances); *Am. Council of the Blind v. Astrue*, No. C 05–04696 WHA, 2009

22 _____
 23 this notice, please contact the Department of Education” by phone or email. *See, e.g.,* ECF No.
 24 35-1 at 10 (Plaintiff Craig’s adjudication notice). Moreover, the notice’s explanation of the
 25 process (“The Department will notify your loan servicer of the approved amounts for
 forgiveness, and the forgiveness should be completed within the next 90-120 days”) makes
 sufficiently clear that, absent further steps, the decision is final. *See id.*

26 ²⁴ Contrary to Plaintiffs’ assertions, the mere fact that some underlying data might not be
 27 releasable to Plaintiffs does not violate due process. *See Al Haramain Islamic Found., Inc. v.*
 28 *U.S. Dep’t of Treasury*, 686 F.3d 965, 981 (9th Cir. 2012) (rejecting plaintiffs’ contention that
 if information underlying a designation cannot be revealed to the designee, the relevant agency
 must either decline to designate the individual or reveal the information).

1 WL 3400686, at *22 (N.D. Cal. Oct. 20, 2009). This is especially true here, where ED’s process
 2 for discharging outstanding loan balances based on successful borrower defenses parallels the
 3 manner in which it has recognized the existence of valid defenses to date, which similarly
 4 focused on programmatic misconduct and assumed, rather than demonstrated, individualized
 5 harm. In any event, Plaintiffs have not clearly demonstrated, as is necessary to warrant a PI, that
 6 additional procedures would minimize the risk of an erroneous deprivation, or that existing
 7 procedures are otherwise constitutionally insufficient.

8 3. The Government’s Interests Outweigh Any Benefits of Added Process

9 With respect to the third *Mathews* factor, the Department has a strong interest in
 10 maintaining its procedures and the Court should “lean heavily on the agency’s expertise in
 11 fashioning its application” and award process. *Foss v. Nat’l Marine Fisheries Serv.*, 161 F.3d
 12 584, 589 (9th Cir. 1998). In evaluating the process for determining the amount of relief awarded
 13 successful borrower defense claimants, the Department reasonably determined that the amount
 14 of discharge awarded should be assessed in terms of the lack of value the Corinthian program
 15 afforded, as compared to the value provided by other comparable programs. Requiring the
 16 Department to analyze each borrower’s entitlement to relief on an individualized basis and to
 17 review individualized earnings documentation, as Plaintiffs seek, would be significantly more
 18 burdensome than the Department’s chosen process, and would severely tax its resources. *See*
 19 Declaration of Julian Schmoke (“Schmoke Decl.”) (attached as Exhibit C) ¶¶ 10-12 (noting that
 20 the Department does not currently have in place a conceptual framework to guide it in “making
 21 individualized determinations of relief for borrower defense claims,” and that putting such
 22 procedures in place would be “administratively burdensome,” insofar as it would require the
 23 “development of a general framework for relief determinations, the hiring and training of
 24 personnel, and likely changes to the Department’s systems and processes”); Declaration of Frank
 25 D. Curran (“Curran Decl.”) (attached as Exhibit D) ¶ 4 (estimating that it would cost over one
 26 million dollars to modify existing templates and intake processes to add requests for information
 27 “that would need to be individualized by applicant”). Granting Plaintiff’s motion could also be
 28 administratively burdensome for the Department, if it means the Department must re-process

1 large volumes of claims it has already adjudicated. Plaintiffs do not even acknowledge these
 2 burdens, much less attempt to balance them, as required by *Mathews*. They have not shown their
 3 Due Process claim is likely to succeed.²⁵

4 **F. Plaintiffs Fail To Establish A Likelihood of Success On Their Claim That**
 5 **The Department’s Partial Discharge Process Is Arbitrary and Capricious**

6 Finally, Plaintiffs assert that they are likely to succeed on their claim that the “Average
 7 Earnings Rule” is arbitrary and capricious. *See* PI Mot. at 39. This argument is largely
 8 derivative of arguments asserted elsewhere in Plaintiffs’ Motion, and is unlikely to succeed on
 9 the merits for many of the same reasons described above.

10 According to Plaintiffs, the “Average Earnings Rule” that they seek to challenge “is the
 11 procedure the Department publicly announced on December 20, 2017.” Pls.’ Proposed Order
 12 at 3. As discussed above, however, *supra* Sec. II.A.2.ii, the December Press Release is not final
 13 agency action subject to APA review. Indeed, because it does not on its face determine any
 14 rights or obligations, and provides for tiered relief based on the value of particular programs,
 15 the instant facial challenge is not fit for judicial resolution without further particularized
 16 evidence of how the policy is applied in individual cases. *See Colwell*, 558 F.3d at 1126-28.

17 To the extent Plaintiffs seek to challenge the “application” of this so-called Rule, as in
 18 cases such as named Plaintiff Jennifer Craig and declarant Alina Farajian, *see* PI Mot. at 40-41,
 19 Plaintiffs fail to demonstrate the Department has “departed irrationally” from its “usual rules of
 20 decision” in adjudicating applications for borrower defenses. *Cal. Trout*, 572 F.3d at 1023. As
 21 discussed above, the Department’s decision to base the amount of discharge awarded in these
 22 cases on the lack of value of the education received at the relevant Corinthian program,
 23 determined through a comparison of average earnings data at that program with average
 24 earnings data at a passing GE program, was reasonable in light of its discretion under the
 25 governing regulation to relieve a borrower of the obligation to repay “all or part of the loan”

26 ²⁵ Plaintiffs assert, in a footnote, that the Department “failed” to take various actions Plaintiffs
 27 assert were required under the Privacy Act. PI Mot. at 38-39 n. 14. They do not explain,
 28 however, if or why they believe these failures are actionable under the Due Process clause, and
 this conclusory allegation, without more, cannot demonstrate a likelihood of success on the
 merits or entitle Plaintiffs to the extraordinary remedy of preliminary injunctive relief.

1 upon assertion of a successful borrower defense. The Department was within its discretion to
 2 determine to offset the value of any discharge awarded (*i.e.*, determine that a successful claimant
 3 is relieved of the obligation to repay “part” of his/her loan) by the actual harm suffered as the
 4 result of attending a particular educational program on the basis of documented
 5 misrepresentations, measured by the educational value actually received, as opposed to
 6 assuming that such an education is completely without value. Indeed, the evidence in front of
 7 the agency suggested that many Corinthian graduates “did in fact receive something of
 8 substantial value from their education,” Manning remarks at 11, and in some cases attended
 9 Corinthian programs for which the average earnings exceeded those for students in comparable
 10 GE programs. *Id.*; *see also* Juengst Declaration ¶¶ 11-13. The Department has demonstrated a
 11 “rational connection between the facts found and the choice made.” *All. Against IFQs v. Brown*,
 12 84 F.3d 343, 345. (9th Cir. 1996).

13 Plaintiffs assert that the Department’s reliance on the GE standard was “irrational”
 14 insofar as it focused on average earnings without comparison to debt. PI Mot. at 40. Plaintiffs’
 15 assertion that the relief methodology does not consider a borrower’s debt is incorrect; the
 16 Department’s relief methodology does take debt into account, in providing relief calculated as
 17 a percentage of a particular borrower’s debt. And this approach is rational because the
 18 Department’s analysis revealed that many Corinthian programs performed well under the GE
 19 program, *see* Juengst Decl. ¶ 11 (noting that 51 out of 106 such programs had passing GE ratings
 20 and that only six failed), and the Department accordingly determined that a relief methodology
 21 based on the full GE debt-to-earnings ratio might yield little to no relief for many borrowers.
 22 *See* Manning Decl. ¶ 20. A program’s ability to prepare a student for gainful employment is
 23 not the same thing as the educational value a student receives at that program, for purposes of
 24 determining the relief appropriate in response to a school’s misconduct, and it was reasonable
 25 for the Department to conclude that earnings provides a better proxy for lost educational value,
 26 *i.e.*, the harm suffered by borrowers, than an analysis of how those earnings interact with debt.

27 Agency action should only be set aside as arbitrary and capricious where the agency
 28 “relied on factors which Congress has not intended it to consider, entirely failed to consider an

important aspect of the problem, offered an explanation for its decision that runs counter to the evidence before the agency” or is so implausible that it could not be ascribed to a difference in view or the product of agency expertise.” *State Farm*, 463 U.S. at 43. The Department’s adjudication of Ms. Craig’s claim, on the basis of its improved discharge process, did none of these things. It did not rely on any “factors which Congress has not intended it to consider,” for, as described above, Congress did not provide any relevant factors; and it did not “entirely fail[] to consider an important aspect of the problem” (in contrast to prior practice, the improved relief methodology takes into account the value of the education received and the measure of harm suffered before determining the appropriate amount of loan discharge based on the school’s misconduct). Nor did the Department “offer[] an explanation for its decision that runs counter to the evidence before the agency” (its process is consistent with its finding that “graduates from many of Corinthian’s academic programs did in fact receive something of substantial value from their education,” and that, in “many instances,” “groups of graduates from Corinthian programs” performed even better than those from well-performing GE programs,” Manning remarks at 11) or render a decision “so implausible that it could not be ascribed to a difference in view or the product of agency expertise” (as described, the agency brought its expertise to bear in determining the objective value of Corinthian educational programs). *Id.* Accordingly, its determination is neither arbitrary nor capricious.

The Department did not create any binding rule entitling Plaintiffs to “full discharge,” *see supra* Sec. II.A.1, and thus did not (and could not have), in awarding some members of Plaintiffs’ proposed class a partial discharge, arbitrarily depart from any legal requirement to award different relief. *See* PI Mot. at 40-41. Similarly, Plaintiffs’ contention that the Department’s alleged due process violations (*i.e.*, its alleged improper use of “third-party data” and failure to “provide a full explanation” for its determinations) further render its partial relief determinations arbitrary and capricious, *id.* at 41, lacks merit for the reasons set forth *supra* Sec. II.E; *see also Weinberger v. Salfi*, 422 U.S. 749, 785 (1975) (declining to impose requirement that agency make “individualized determinations” regarding the distribution of social insurance where associated difficulties “outweigh the marginal increments” in effectiveness that such

individual determinations could be expected to produce). In any event, the Department was careful to employ, where possible, presumptions favorable to the borrower when making its average earnings comparison, such as excluding CCI program from the set of passing GE programs and including all CCI students with borrower defense claims in the CCI earnings data (as opposed to only those who had completed their program), *see generally* Juengst Decl. ¶¶ 25-29, and reasoned that instead applying relief based on individualized earnings would remove such presumptions and “most likely lower the total amount of the payout to borrowers.” Schmoke Decl. ¶ 19. This balancing of the costs and benefits associated with providing more individualized relief is not arbitrary and capricious.

Finally, Plaintiffs argue that the Department “irrational[ly]” and “impermissibl[y]” interprets its borrower defense regulation to the extent that “the remedy it employs can be divorced from the state law cause of action that a borrower can assert under the regulation.” *Id.* at 42. This argument has no basis in either law or fact. As discussed above, neither the HEA nor the plain text of the borrower defense regulation establish that state law must dictate the Secretary’s provision of relief, but rather provide the Department with broad discretion to determine the relief appropriate for a successful borrower defense claim. In any event, the state law cause of action on which Plaintiffs’ defense to repayment are based is the California Unfair Competition Law (“UCL”), which prohibits unfair competition, and the Department has determined that Corinthian’s misrepresentation of job placement rates constitutes such unfair competition. *See* First Special Master Report at 5. California law provides that a UCL action is “equitable in nature,” and that remedies are “generally limited to injunctive relief and restitution.” *Korea Supply Co. v. Lockheed Martin Corp.*, 63 P.3d 937, 943 (Cal. 2003) (citation omitted). Restitution under the UCL, in turn, is “the excess of what the plaintiff gave the defendant over the value of what the plaintiff received,” and is designed to, *inter alia*, “restore the defrauded party to the position he would have had absent the fraud.” *Pulaski & Middleman, LLC v. Google, Inc.*, 802 F.3d 979, 988 (9th Cir. 2015) (citations omitted). Plaintiffs provide no support for their contention that the Department’s award of partial discharges to CCI borrowers, based on assessment of the value received from the CCI education and thus a

determination of what those borrowers gave to CCI “*over the value* of what [they] received,” *id.* (emphasis added), somehow untethers the Department’s award of relief from the underlying cause of action on which the borrower defense is based. Plaintiffs are thus unlikely to succeed on their arbitrary and capricious challenge to the Department’s partial discharge process.²⁶

III. The Balance of Equities and the Public Interest Weigh Strongly Against Entry of a Preliminary Injunction

Plaintiffs likewise cannot show the balance of equities tips in their favor. Under the third prong of the preliminary injunction inquiry, courts “balance the competing claims of injury and must consider the effect on each party of the granting or withholding of the requested relief.” *Winter*, 555 U.S. at 24. Under the fourth prong, the courts consider the public interest. Where the federal government is a party, the balance of equities and public interest factors may be merged. *Drakes Bay Oyster Co. v. Jewell*, 747 F.3d 1073, 1092 (9th Cir. 2014). As noted above, Plaintiffs are not seeking merely to preserve the status quo, but instead seek a mandatory injunction compelling specific actions to be undertaken by the agency within arbitrarily limited time periods. *See* Pls.’ Proposed Order at 4 (requesting that ED begin processing applications and granting relief “within 10 days”). These actions will be costly for the Department, in that they will divert resources to borrowers (in excess of the amount the Department has determined is necessary to make them whole) and away from other educational programs, thus running counter to the public interest. As described above, the Department’s method of calculating relief for Corinthian borrowers saves the Department significant costs it would otherwise incur in analyzing each borrower’s entitlement to relief on an individualized basis and reviewing individualized earnings documentation. Moreover, granting Plaintiffs their requested relief

²⁶ Plaintiffs further contend that the Department applied the “wrong legal standard in evaluating claims,” referencing language in Ms. Craig’s adjudication notice indicating that she was entitled to relief based on Corinthian’s “material misrepresentation(s) to you.” PI Mot. at 41. Plaintiffs conveniently ignore the Department’s findings that various Corinthian-operated programs violated state law by making misrepresentations about job placement rates. *See, e.g.* First Special Master Report at 5. Plaintiffs’ selective amnesia notwithstanding, ED’s use of the “material misrepresentations” shorthand to describe Ms. Craig’s claim simply indicates that, in her case (as with all other borrowers in Plaintiffs’ proposed class), the conduct giving rise to a cause of action under state law is, as Plaintiffs recognize, CCI’s material misrepresentation of job placement rates. *See, e.g.*, PI Mot. at 12 (summarizing Department’s findings).

would frustrate the Department's objective of tying discharge amounts to the worth of the relevant programs, and will cost the Department millions of dollars. *See* "Curran Decl." ¶¶ 10-11 (awarding full discharges to the approximately 8,809 borrower defense claimants who have been approved for partial discharges under the improved methodology would yield more than \$70 million in discharged loans, and subject the Department to approximately \$500,000 in additional administrative costs). These savings are in the public interest and demonstrate that a preliminary injunction is inappropriate. *See Pacific Aerospace & Elect. v. Taylor*, 295 F.2d 1198, 1203 (E.D. Wash.) (economic concerns are "valid public interest concerns in the context of preliminary injunctive relief"). *See also* Schmoke Decl. ¶¶ 10-18 (regarding burden to the Department and Department's interest in a manageable, straightforward process); Manning Decl. ¶¶ 13,15 (regarding Department's interest in providing appropriate amounts of relief to borrowers in light of evidence of value for some CCI programs).

Plaintiffs' rely on the Department's statements to show that their requested relief is in the public interest, but those statements merely demonstrate that there is public interest in "the relief that [such borrowers] are entitled to under federal law and regulations." *See* PI Mot. at 49. But the relevant "law and regulations" provide that the Department has discretion to determine the amount of full or partial discharge appropriate for a successful claim for borrower defense. Allowing the court, by issuing the requested injunction, to substitute its judgment for the Department's is not in the public interest. *See Virginian Ry. Co. v. Sys. Fed'n No. 40*, 300 U.S. 515, 552 (1937) (statutory scheme of Congress "is in itself a declaration of public interest which should be persuasive" to courts). The injunction Plaintiffs seek would frustrate and displace the Secretary's exercise of discretion, by replacing the Secretary's determination of what relief is due. *See* Pls.' Proposed Order at 1. The public interest, therefore, weighs heavily against the entry of the injunctive relief Plaintiffs seek here.

CONCLUSION

For these reasons, Defendants respectfully request that Plaintiffs' Motion be denied.

Dated: April 12, 2018

Respectfully submitted,

CHAD A. READLER
Acting Assistant Attorney General

MARCIA BERMAN
Assistant Branch Director

/s/ R. Charlie Merritt
KAREN S. BLOOM
Senior Counsel
R. CHARLIE MERRITT
Trial Attorney
United States Department of Justice

Attorneys for the Defendants

EXHIBIT A

CHAD A. READLER
Acting Assistant Attorney General

ALEX G. TSE
Acting United States Attorney

MARCIA BERMAN
Assistant Branch Director

KAREN S. BLOOM
Senior Counsel
R. CHARLIE MERRITT
Trial Attorney
Civil Division, Federal Programs Branch
U.S. Department of Justice
P.O. Box 883
Washington, D.C. 20044
Telephone: (202) 514-4964
Facsimile: (202) 616-8460
E-mail: karen.s.bloom@usdoj.gov

Attorneys for Defendants

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

MARTIN CALVILLO MANRIQUEZ, *et al.*,

Plaintiffs,

v.

ELISABETH DEVOS, in her official capacity
as Secretary of Education, and the UNITED
STATES DEPARTMENT OF EDUCATION

Defendants.

No. 17-7210

**DECLARATION OF JAMES F.
MANNING IN SUPPORT OF
DEFENDANTS' OPPOSITION TO
PLAINTIFFS' MOTION FOR
PRELIMINARY INJUNCTION**

1 I, James F. Manning, hereby declare under the penalty of perjury as follows:

2 1. I am over the age of 18 and competent to testify to the matters herein.

3 2. I have been delegated the authority to perform the functions and duties of the Under
4 Secretary of the United States Department of Education (“Department”), and serve as the Acting
5 Chief Operating Officer of the Office of Federal Student Aid (“FSA”). I have served as either
6 the Acting Under Secretary or have been delegated the authority to perform the functions and
7 duties of the Under Secretary since April 2017. I have been Acting Chief Operating Officer for
8 FSA since January 2018. Previously, I was a member of the Secretary’s landing and beachhead
9 teams, which arrived at the Department on January 20, 2017.

10
11 3. I certify that I am duly authorized, am qualified, and have been given authority by the
12 Department to make the statements contained in this Declaration regarding the Department’s
13 framework for processing applications for groups of borrowers who filed applications under the
14 Department’s borrower defense to repayment (“borrower defense”) regulations, at 34 C.F.R. §
15 685.206(c), including those related to misrepresentations by schools operated by Corinthian
16 Colleges, Inc. (“CCI”). The statements contained herein are based on my personal knowledge as
17 an employee of the Department, and my review of the pertinent records.
18

19
20 4. As having been delegated the authority to perform the functions and duties of the Under
21 Secretary, I oversee policy development regarding Federal student financial aid and work
22 directly with FSA, which administers Federal student financial aid programs.

23
24 5. As Acting Chief Operating Officer for FSA, I also oversee the management of FSA’s
25 operations and support functions in its administration of Federal student financial aid programs.

26 6. Through my duties as Acting Under Secretary, my duties as Acting Chief Operating
27 Officer for FSA, my previous work as a member of the Secretary’s landing and beachhead team,
28

1 my work on and my discussions with Department staff working on the borrower defense effort, I
2 am generally familiar with the decisions that have been made regarding the borrower defense
3 framework and the implementation of that framework.

4 7. In the winter and spring of 2017, a review panel examined the borrower defense claims
5 and background information and made recommendations on how to resolve pending borrower
6 defense claims and proceed in the future. I was a member of this review panel.

8 8. As part of the review panel's work, the review panel reviewed the criteria and bases for
9 the approvals that had been issued by the Department since 2015, including approvals of
10 discharges for the total amounts of borrowers' Federal student loans and reimbursement of
11 payments for the following categories of CCI borrower defense claims:
12

- 13 a. Claims related to job placement rate misrepresentations made to attendees of
14 specified programs offered at Heald College campuses ("Heald JPR claims") under
15 findings made by the Department;
- 16 b. Claims related to job placement rate misrepresentations made to attendees of
17 specified programs offered at certain Everest/WyoTech campuses under findings
18 made by the Department ("Everest/WyoTech JPR claims");
- 19 c. Claims related to guarantees of employment by CCI ("Guaranteed Jobs claims") at all
20 CCI campuses between the time when CCI opened or acquired the campus and April
21 2015;
- 22 d. Claims related to misrepresentations as to the transferability of credits at any Everest
23 school or WyoTech's Laramie campus between the time when CCI opened or
24 acquired the campus and April 2015 ("Everest/WyoTech Transfer of Credits
25 claims"); and
26
27
28

e. Claims related to misrepresentations as to the transferability of credits at California
Heald campuses after CCI acquired the school (“Heald Transfer of Credits claims”).

9. In the review panel’s examination of the approvals that had been issued for these
categories of CCI claims, we found that the previous approvals had been based on the
assumption that CCI borrowers received a worthless education and therefore that the discharge
of the total amount of borrowers’ loans and reimbursement of all payments was appropriate for
all CCI borrowers with valid claims.

10. The review panel recommended that the Department reevaluate this assumption, given
the nature of the allegations of harm made in CCI borrower defense claims and the types of
evaluations the Department already conducts for programs such as those attended by CCI
students.

11. Generally, CCI borrowers have affirmed in their borrower defense applications that the
primary reason for enrolling at CCI was to improve their careers and to make a better living. To
the extent borrowers offer allegations of harm in their claims, they focus on the struggles they
have had in finding employment because of an alleged lack of value provided to them by their
CCI educations.

12. The Department already gathers employment-related information in the form of students’
earnings for the type of academic programs offered by CCI. Under the Department’s regulations
at 34 C.F.R. part 668, subpart Q, the Department collects earnings information for programs,
such as those offered by CCI schools, that are required to provide training that prepares students
for gainful employment in a recognized occupation (a “Gainful Employment” or “GE program”).

13. In January of 2017, the Department released the program earnings and debt-to-earnings
ratios for the performance of GE programs for debt measure year 2015, which included many

1 CCI programs.¹ The data from those determinations revealed that reporting programs at CCI
2 schools performed relatively well overall under the Department's GE measures. Only six of
3 CCI's 106 programs failed the GE measures and 51 had passing rates.

4 14. Generally, the GE measures use the average program earnings for graduates and the
5 average educational debt for those graduates to see if those students have the ability to repay the
6 educational debt incurred for attending such programs. A program is "passing" under the
7 Department's GE measures if students' annual loan payment is less than or equal to either 20%
8 of their discretionary income or 8% of annual earnings. A program is in the "zone" if the
9 students' annual loan payment is greater than 20% but less than or equal to 30% of their
10 discretionary income or their annual earnings rate is greater than 8% but less than or equal to
11 12%. A program is "failing" if the students' annual loan payment is greater than 30% of their
12 discretionary income and greater than 12% of their annual earnings or the students' annual
13 earnings are zero. Programs that continue to fail or score in the zone will, over time, lose
14 eligibility for Federal student aid.
15

16 15. I was aware of and familiar with CCI programs' overall performance in the GE program
17 and that was a factor in the decision to reevaluate the assumption that CCI students received no
18 value from their educations.
19

20 16. Given the statements from CCI borrower defense claimants, the availability of earnings
21 data from the Department's analysis of such data pursuant to the GE regulations, and the
22 knowledge that some CCI programs had passing GE rates, the Department made the
23 determination to reevaluate the assumption that CCI students had been harmed because they had
24
25
26
27

28 ¹ This data are available on the Department's website at <https://studentaid.ed.gov/sa/sites/default/files/GE-DMYR-2015-Final-Rates.xls>.

1 not received any value from their educations, and to consider such value in terms of CCI
2 students' earnings.

3 17. Further, the Department made the determination that the lack of value to CCI students
4 may be measured as the difference between the value of the education that the students received
5 and an education that would have met students' reasonable expectations of preparation for
6 gainful employment.
7

8 18. Given that the Department had a large number of pending borrower defense claims to
9 process, the Department was also interested in establishing a way to determine relief that would
10 not be overly time-consuming or difficult to apply in a consistent manner.
11

12 19. The Department was committed to using, to the extent possible, information it already
13 had in its possession to make relief determinations to avoid adding more time to the borrower
14 defense decision-making process.

15 20. Further, the Department decided not to consider the amount of Corinthian borrowers'
16 debt in determining relief. One of the factors in this decision was the relatively strong
17 performance of Corinthian programs under the Department's GE program, from which we
18 concluded there may be some likelihood that determinations of harm based upon CCI students'
19 relative debt to earnings may yield many borrowers with little to no relief.
20

21 21. These determinations informed the relief methodology and decisions documented in a
22 December 15, 2017 memorandum authored by Phillip Juengst, Senior Advisor for the Office of
23 the Chief Financial Officer at the Department, in collaboration with FSA and the Department's
24 Office of the General Counsel.
25

26 22. On December 20, 2017, the Department issued a press release announcing this relief
27 methodology. A true and correct copy of that press release is attached as Exhibit 1.
28

23. I also explained the Department's relief methodology in remarks I made on January 8,
2018 at the Department's second negotiated rulemaking session for the Department's review of
the borrower defense regulations. A true and correct transcript of my remarks is attached as
Exhibit 2.²

I declare under penalty of perjury, pursuant to the provisions of 28 U.S.C. § 1746, that the
foregoing is true and correct.

Executed on this 12th day of April, 2018.



James F. Manning
Delegated the Authority to Perform the Functions
and Duties of the Under Secretary
Acting Chief Operating Officer, Office of Federal
Student Aid
United States Department of Education

² These remarks are also available on the Department's website at
<https://www2.ed.gov/policy/highered/reg/hearulemaking/2017/manningopeningremarks.docx>, and in the unofficial
transcript of the proceedings, available at
<https://www2.ed.gov/policy/highered/reg/hearulemaking/2017/bdday1session2.docx>.

EXHIBIT 1

Improved Borrower Defense Discharge Process Will Aid Defrauded Borrowers, Protect Taxpayers

**Clear evaluation criteria will expedite review process, ensure harmed students are treated fairly
Department announces action related to more than 20,000 pending claims**

DECEMBER 20, 2017

Contact: Press Office, (202) 401-1576, press@ed.gov ([mailto: press@ed.gov](mailto:press@ed.gov))

WASHINGTON – After careful review to ensure a fair and efficient process, the U.S. Department of Education (the Department) today unveiled an improved discharge process for borrower defense to repayment (BDR) claims.

"We have been working to get this right for students since day one," said Secretary Betsy DeVos. "No fraud is acceptable, and students deserve relief if the school they attended acted dishonestly. This improved process will allow claims to be adjudicated quickly and harmed students to be treated fairly. It also protects taxpayers from being forced to shoulder massive costs that may be unjustified."

For pending claims, no changes were made to the existing approval criteria. Claims that previously would have been approved will still be approved today. However, rather than taking an "all or nothing" approach to discharge, the improved process will provide tiers of relief to compensate former Corinthian students based on damages incurred.

NEW PROCESS FAIRLY COMPENSATES FOR DAMAGES

Students whose current earnings are less than 50 percent of their peers from a passing gainful employment (GE) program will receive full relief. Students whose earnings are at 50 percent or more of their GE program peers will receive proportionally tiered relief to compensate for the difference and make them whole (Table 1).

Table 1

CCI Earnings as a Percentage of GE Earnings	Amount of Relief
1% to 49%	100%
50% to 59%	50%
60% to 69%	40%
70% to 79%	30%
80% to 89%	20%
90% and above	10%

In all calculations, rounding is done to the benefit of the student, including:

- Relief is rounded up by tenths. For example, if a student had 59 percent of a passing GE program earnings, the student would receive 50 percent BDR relief.
- The better of mean or median earnings as compared to GE program peers is used to calculate relief.
- If the student was enrolled in multiple programs, the program which yields the most relief is the program used in the calculation.

Additionally, to mitigate the inconvenience for how long it has taken to adjudicate claims, the Department will apply a credit to interest that accrues on loans starting one year after the borrower defense application is filed.

The principle of relief based on value of education received is consistent with the legal authorization of BDR under the Higher Education Act and the existing BDR regulation, 34 CFR 685.206 [C][2], adopted in the Clinton Administration. Similar concepts for partial relief were proposed by the Obama Administration in its October 2016 regulation.

RESPONDS TO CONCERNS RAISED BY INSPECTOR GENERAL

Following an internal review, the Secretary was concerned that there was no standardized process in place. In May, Secretary DeVos requested the Education Inspector General (IG) look into the existing procedures for claim adjudication.

The IG found "weaknesses with FSA's procedures for: 1. documenting the review and approval of legal memoranda establishing categories of borrower defense claims that qualified for discharge; 2. reviewing borrower defense claims; 3. processing claims approved for loan discharge and flagged for denial; and 4. establishing timeframes for claims intake, claims review, loan discharge, and claims denial processes and controls to ensure timeframes are met."

The Department has worked diligently to address the issues cited, yielding the improved discharge process.

ACTION TAKEN TODAY

The Department has approved for discharge 12,900 pending claims submitted by former Corinthian Colleges, Inc. students, and 8,600 pending claims have been denied. This action includes claims that have been received during this administration. Many of the denied claims were identified for denial, but not acted on, by the prior administration.

Borrowers will be notified on a rolling basis as their discharge is finalized. The remaining pending claims will be adjudicated systematically under the newly announced discharge process.

CONTINUING TO IMPROVE BORROWER DEFENSE

The borrower defense to repayment regulation currently is under negotiated rulemaking, which began Nov. 13. As Secretary DeVos stated when she announced the Department's regulatory reset on June 14, 2017, the previous regulatory process yielded a "muddled process that's unfair to students and schools and puts taxpayers on the hook for significant costs." She continued, "It is the Department's aim, and this Administration's commitment, to protect students from predatory practices while also providing clear, fair and balanced rules for colleges and universities to follow."

The negotiators will continue to work toward a new regulation that will treat students, institutions and taxpayers fairly.

Tags: Regulation (/category/subject/regulation) Student Financial Aid (/category/subject/student-financial-aid) Student Loan Programs (/category/subject/student-loan-programs) Borrower Defense (/category/keyword/borrower-defense) Press Releases (/news/press-releases)

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Our mission is to promote student achievement and preparation for global competitiveness by fostering educational excellence and ensuring equal access.

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EXHIBIT 2

Proceedings

(9:00 a.m.)

Ms. Miller: Good morning, everybody. Welcome to Session 2 of Borrower Defense Negotiated Rulemaking. Welcome back to a lot of you.

So we're going to go ahead and get started. We have a few negotiators who are in transit and aren't here yet. But we're going to keep the process moving. We don't want to hold on too long and we'll catch them up once they get here.

Does that sound good? Okay. So before we begin I would like to turn it over to the Department to welcome us.

Welcome and Remarks

Mr. Manning: Good morning and welcome back and Happy New Year. I hope you all had a restful holiday and are ready to dive back into the important work of this committee.

In November I addressed you concerning the status of the pending borrower defense claims, the Department's efforts to reduce the backlog and the general plans for administering borrower defense until the new rule takes effect.

Since then you have undoubtedly heard of the Department's execution of the plans I previewed to you then. I am sure you have many questions about the Department's approach and as important stakeholders on this issue I felt it important to provide you with another update.

On December 20th after a careful review taking into account the interests of both borrowers and taxpayers, the Department announced it was resuming the approval process for borrower defense claims, particularly for those from former Corinthian students.

As we've noted, the Department has identified approximately 21,500 claims for approval or denial, 12,900 of which are approvals and 8,600 of which are denials.

As of today, we have notified approximately 657 borrowers of the approval of their claim and approximately 500 borrowers have been notified of the denial with several thousand in the pipeline to be acted on soon.

Of the 500 borrowers informed of their denial claims pending for less than a year, so the interest on the deduction process I described to you in November was not applicable because those 500 borrowers, as I said, were less than a year.

The Department will continue on a rolling basis as quickly as we can to notify those borrowers who have yet to hear from the Department about the resolution of their claim. The Department will also apply the already mentioned interest deduction to the denied claims that have been pending for greater than a year.

Our hope for claims moving forward is that borrowers will not need to take advantage of that offering because their claim should be dispensed with within a year's time. The Department will also continue to review the approximately 35,577 Corinthian claims that to date it has not adjudicated under the framework recently announced.

However, now that the Department has the right business process and a solid infrastructure in place we expect to move the existing claims steadily as well as any claims submitted by Corinthian borrowers in the future.

We've seen an approximate 36 percent reduction in the number of pending Corinthian claims as a result of our recent actions and the downward trend should continue. I thank the borrower defense unit at FSA for its hard work in continuing to process these claims.

Now I would like to address a few specifics to improve borrower defense discharge process. First, I'm happy to announce the Department has largely addressed the weaknesses in the existing borrower defense procedures identified in both the Department's own internal review as well as the recent report of the Inspector General.

While some in the press portrayed the IG report as critical of the current administration's handling of the program the truth is that

Secretary DeVos herself requested the IG review because of her concerns regarding the program she inherited.

She was particularly dismayed by the haphazard approach taken by the previous administration exacerbated by activity encouraging borrowers to flood the Department with claims without a proper infrastructure in place to manage them.

I thank the IG for its work and helpful recommendations. I also applaud the work of the Department staff, including those at FSA, to correct weaknesses identified in the IG's report related to improving documentation in the review process.

Establishing time frames for claims intake, review and discharge and shoring up other areas of the program. Next I want to turn off my phone and emphasize that the Department has not changed the existing approval criteria for Corinthian borrowers.

Let me repeat that again. The Department has not changed the existing approval process for Corinthian borrowers. Claims approved under the previous administration will be claims approved under this one.

While some may not agree with facets of our approach the Department has not instructed staff to review claims with extra scrutiny. I would also like to add that many of the claims now being denied were flagged for denial in the previous administration.

As the IG noted in its report, the previous administration had not set up a process to act on denials. We now have. Now I know I'm speaking to an audience that has already been educated on the approach the Department is taking regarding relief to borrowers.

So I'll proceed assuming you have some knowledge of the basics. I would like to make a few points regarding what we call the make whole relief approach.

First, the Secretary was simply not comfortable with an either all or nothing approach. So while the Department does not dispute its own finding regarding Corinthian's wrongful conduct it was skeptical of the prior conclusion that assumed all Corinthian students received nothing

of value from their education.

Given the Secretary's discretion to determine relief owed to borrowers we looked at an alternative approach. The Department engaged in the process you have likely read about which compared aggregate program level earnings data of Corinthian borrowers with peer groups from passing gainful employment programs.

I understand questions have arisen that Corinthian programs were not generally part of GE. That is true. But the Department obtained aggregate earnings data from cohorts of Corinthian borrowers grouped together in the same way as GE cohorts to ensure an apples to apples comparison on earnings data.

Our findings revealed that graduates from many of Corinthian's academic programs did in fact receive something of substantial value from their education. Groups of graduates from Corinthian programs in many instances performed even better than those well performing GE programs.

Given its responsibility to the taxpayer the Department simply could not ignore what the data revealed. And given the fact that borrowers by and large failed to provide any real evidence of harm it has proceeded based on what evidence it does have in its possession.

Likewise the Secretary believed a nothing approach also seemed unfair even for those attendees of Corinthian programs who are earning as much or more than graduates of GE passing programs.

Accordingly, we devised a relief methodology that recognizes that those with valid claims suffered some basic harm by virtue of the misrepresentations. That is why all borrowers with approved claims, even those in groups who earned more than their GE counterparts, will receive at least ten percent relief.

Moreover, within the broad parameters of our approach for relief the Department has made additional assumptions in favor of the borrower leading to awarding more relief. Let me provide some examples.

First, if a borrower had been enrolled in multiple academic programs we would assess relief using their program with the lowest earnings so

as to provide the borrower the greatest amount of relief.

Second, the Department calculated both Corinthian and GE earnings four possible ways using mean or median and weighted approaches and went with the results that provided the most relief for the borrowers in the program. Another, within our tiered relief system all borrower's relief is rounded up to the nearest tenth percentile point.

For example, the Corinthian borrower in a program who averaged earnings of 59 percent of the GE program average earnings could be entitled to only 41 percent relief using a purely one to one inverse relief methodology.

But under our approach that borrower is entitled to 50 percent relief. And as I've said, borrowers whose earnings exceed those of their GE counterparts will receive ten percent relief at least.

There are other examples where the Department made these types of decisions in favor of the borrower. But they begin to get extremely technical and you have a long day ahead of you so I will spare you some of the details now.

In sum, the relief approach outlined is fair to both borrowers and taxpayers and is the product of a data-driven approach that makes the most of a difficult and complex situation. The Department is also working to assess claims from schools other than Corinthian.

We have roughly 46,000 pending claims from non-Corinthian schools. And while we are working diligently to adjudicate those claims, I do not have any more specific information to share with you today.

On behalf of Secretary DeVos I want to thank you all again for the work on this committee. After the slow start last time I realized that there was a lot of thoughtful and fruitful discussion in your first meeting in November and I'm confident that will continue over the next week.

So again, on behalf of Secretary DeVos I want to thank you all again for your work on this committee. After the slow start we're looking forward to another thoughtful and fruitful discussion over the course of the next several days.

So thanks again for your work and your commitment to this very important effort. I look forward to following your progress. Thank you very much.

Mr. Bantle: Okay, thank you. And for those who I have not seen this morning, good morning. Next thing we want to do just as we do have people streaming in with various travel and weather delays, we want to go around the room.

This will also serve to make sure everyone's microphone works and just quickly if the negotiator who is sitting at the table could introduce him or herself and state if you are the primary or the alternate negotiator. So we'll start with Kelli.

Ms. Hudson Perry: Kelli Hudson Perry, primary negotiator for chief business officers.

Mr. McComis: Michale McComis, primary negotiator for the accreditation community of interest.

Mr. Bush: Stevaughn Bush, Howard School of Law, alternate negotiator for United Students Association.

Ms. Hall: Good morning. Wanda Hall, the primary for lenders and secondary markets on the FFEL side.

Ms. O'Connell: Jaye O'Connell, primary for guaranty agencies.

Mr. Busada: Mike Busada, primary for small private for-profit schools under 450 students.

Mr. Murray: Good morning. Lodriguez Murray, alternate for historically black colleges, universities, MSIs. My primary, Mr. Flanigan is not here this week so the alternate has to become the primary.

Ms. Shafroth: Abby Shafroth, primary for legal services organizations that represent students and borrowers.

Mr. Hubbard: Will Hubbard representing the military affiliated community.

Ms. Weisman: Annmarie Weisman representing the Department.

EXHIBIT B

CHAD A. READLER
Acting Assistant Attorney General

ALEX G. TSE
Acting United States Attorney

MARCIA BERMAN
Assistant Branch Director

KAREN S. BLOOM
Senior Counsel
R. CHARLIE MERRITT
Trial Attorney
Civil Division, Federal Programs Branch
U.S. Department of Justice
P.O. Box 883
Washington, D.C. 20044
Telephone: (202) 514-4964
Facsimile: (202) 616-8460
E-mail: karen.s.bloom@usdoj.gov

Attorneys for Defendants

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

MARTIN CALVILLO MANRIQUEZ, *et al.*,

Plaintiffs,

v.

ELISABETH DEVOS, in her official capacity
as Secretary of Education, and the UNITED
STATES DEPARTMENT OF EDUCATION

Defendants.

No. 17-7210

**DECLARATION OF PHILLIP JUENGST
IN SUPPORT OF DEFENDANTS'
OPPOSITION TO PLAINTIFFS' MOTION
FOR PRELIMINARY INJUNCTION**

1 I, Phillip Juengst, hereby declare under the penalty of perjury as follows:

2 1. I am over the age of 18 and competent to testify to the matters herein.

3 2. I am employed by the United States Department of Education ("Department") as a Senior
4 Advisor for the Office of the Chief Financial Officer ("OCFO"). I have been in my current role
5 since March 2018. I have worked for the federal government for almost 20 years, including
6 more than 14 years at the Department. From January 2017 until March of this year, I was acting
7 in a number of capacities, including as the Department's Performance Improvement Officer,
8 working on high-level cross-Department issues. From 2011 to 2017, I held several positions in
9 the OCFO directly leading or overseeing the Department's internal control program. These
10 included Director of the Internal Controls Evaluation Group followed by Deputy Director, then
11 Director of Financial Improvement Operations, the division of which the internal controls group
12 is a part.
13
14

15 3. I certify that I am duly authorized, am qualified, and have been given authority by the
16 Department to make the statements contained in this Declaration regarding the Department's
17 methodology for determining relief for certain groups of borrowers who filed applications under
18 the Department's borrower defense to repayment ("borrower defense") regulations, at 34 C.F.R.
19 § 685.206(c), related to misrepresentations by schools operated by Corinthian Colleges, Inc.
20 ("CCI"). The statements contained herein are based on my personal knowledge as an employee
21 of the Department, and my review of the pertinent records.
22
23

24 4. As Senior Advisor, my job responsibilities include supporting the Chief Financial
25 Officer, Deputy Secretary, Director of Financial Improvement Operations and other management
26 officials in leading key risk management and internal control-related priorities for improving
27 operations. OCFO is occasionally asked by other offices in the Department to consult and make
28

1 recommendations on issues relating to their programs, including the student financial assistance
2 programs. As a Senior Advisor and as the former Director of Financial Improvement
3 Operations, I am sometimes involved in such consulting efforts.

4 5. In May of 2017, the OCFO was directed to assist the Department's Federal Student Aid
5 ("FSA") office in strengthening procedures to process pending borrower defense claims. I was
6 asked to lead OCFO's assistance effort, which I did. This included assisting FSA in assessing the
7 extent to which CCI students had been harmed by CCI's misrepresentations, for the purpose of
8 determining the amount of relief to provide to CCI borrower defense claimants.
9

10 6. I authored a memorandum in collaboration with FSA and the Department's Office of the
11 General Counsel ("OGC"), dated December 15, 2017, detailing the steps in the relief
12 methodology that were developed. A true and correct copy of that memorandum is attached as
13 Exhibit 1.
14

15 7. As noted in the December 15, 2017 memorandum, the methodology is based on the
16 Department's determination that the harm to certain CCI students may be determined by
17 assessing the value students received from the education provided by CCI, as compared to that
18 provided by other schools to students in similar programs. *See* Exhibit 1, at 1. This relative lack
19 of value was determined by comparing the earnings of CCI students who had enrolled in a
20 specific program to those who had enrolled in and completed similar programs at other schools.
21

22 8. More specifically, the earnings of former CCI students were aggregated, and compared to
23 the aggregated earnings outcomes of students at other schools, by (a) comparing such data for
24 programs with the same Classification of Instructional Programs ("CIP") code and the same level
25 of credential and (b) by limiting the earnings data for the other schools' students, to which CCI
26
27
28

1 former students' earnings were compared, to those of former students who had completed
2 programs that are "passing" under the Department's gainful employment ("GE") regulations.

3 9. The CIP system is a taxonomic scheme of official program classification codes developed
4 by the Department's National Center for Education Statistics ("NCES") and which are used by
5 the Department and schools to track and report fields of study and program completions activity.

6 10. The Department's GE data are publicly available, including the earnings data used to
7 calculate the "passing" ratings, at <https://studentaid.ed.gov/sa/about/data-center/school/ge/>.

8 11. Seventeen of the 37 CCI-operated school locations have reported GE data on the
9 Department's website. Among the 17 locations, GE ratings are available for 106 programs,
10 collectively, for the 2015 debt measure year. Many of these locations reported the same
11 programs, which combine to reflect 24 CIP codes on the website for CCI-operated schools.
12 Fifty-one of those programs had passing GE ratings. Only six of those programs failed the GE
13 measures. A true and correct copy of a summary I compiled, based upon the Department's
14 publicly-available GE ratings data for the 2015 debt measure year,¹ is attached as Exhibit 2.

15 12. The OCFO conducted a preliminary analysis of these CCI program earnings to determine
16 whether comparing aggregate earnings of CCI students to aggregate earnings of students at
17 similar programs may provide a reasonable approach for assessing the value of CCI programs.

18 13. This preliminary analysis showed that earnings for some CCI programs were less than
19 earnings for students at similar programs, and in other instances earnings for CCI students were
20 similar to or greater than the earnings for students at similar programs. This analysis suggested
21 that a more rigorous analysis of earnings may provide a reasonable approach for determining the
22 appropriate amounts of relief to award CCI students.
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28 ¹ This data are available at <https://studentaid.ed.gov/sa/sites/default/files/GE-DMYR-2015-Final-Rates.xls>.

1 14. To conduct a full earnings comparison, it was necessary to map CCI borrower defense
2 claims to CIP codes and credential levels. The process and assumptions used are described in
3 Step 1 of the December 15, 2017 memorandum.

4 15. This mapping was necessary, first, because earnings for many CCI programs are not
5 included in the reported data for GE. To conduct a more complete and accurate earnings
6 comparison, the Department first needed to determine mean and median earnings for as many
7 CCI programs as possible.

9 16. Second, as noted in the December 15, 2017 memorandum, this required grouping
10 claimants by CIP code and credential level. The program and credential information provided on
11 borrower defense claims and the same information for the students at issue in the borrower
12 defense claims as provided by Zenith Education Group, did not include official CIP codes. In
13 many instances, multiple programs offered by CCI corresponded to a single CIP code.
14 Moreover, the claim data and data provided by Zenith Education Group were not uniform and
15 did not always match, and did not always correspond to the Department's official listing of
16 programs offered by CCI schools.

17 17. The mapping was performed for all 68,836 CCI borrower defense claims that had been
18 received by the Department and provided to OCFO by July 31, 2017, regardless of whether a
19 claim had already been decided by the Department.

20 18. The results containing how CCI programs—as reported by claimants and Zenith
21 Education Group—were mapped to CIP codes are in Appendix B to the December 15, 2017
22 memorandum.

23 19. After the mapping was complete, FSA provided information to the SSA on the former
24 CCI students at issue in the borrower defense claims received by the Department, organized in
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1 groups by CIP code and academic credential level. In turn, the SSA provided mean and median
2 income data for each group, based on the most recently available (2014) earnings data. This
3 process is described in Step 2 of the December 15, 2017 memorandum.

4 20. Earnings data for claimants in groups with fewer than 10 individuals were not requested
5 from SSA, due to privacy concerns. In addition, groups with fewer than 10 individuals may not
6 produce earnings data that would be reasonably representative of the value of a CCI program.

7 21. Students for which the Department lacked sufficient data to map to CIP code and
8 credential level were excluded from the groups submitted to SSA. Generally, given the large
9 number of CCI borrower defense claims received by the Department and analyzed as part of the
10 relief methodology, it was determined that the exclusion of such relatively few students' earnings
11 data would not significantly alter the mean and median earnings of the CIP code and credential
12 groups for the purpose of the relief methodology.

13 22. The Department also excluded students who started CCI programs in 2014 or after,
14 because it was assumed CCI programs would have been unlikely to have influenced 2014
15 earnings outcomes for such students.

16 23. As a result of these exclusions, FSA sent the names of 61,717 former CCI students to
17 SSA for earnings data.

18 24. When the Department received the data from SSA, the OCFO compared the CCI earnings
19 data for each program and credential level (the "CCI earnings data set") to publicly available,
20 2014 earnings data for former students in passing GE programs (the "GE comparison data set")
21 with the same CIP code and academic credential level. The OCFO's calculations and the
22 principles guiding the process are described in Step 3 of the December 15, 2017 memorandum.
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1 25. As described by the December 15, 2017 memorandum, the OCFO, FSA, and OGC
2 decided as a guiding principle to use earnings comparisons favoring the borrower.

3 26. For example, only passing GE programs were included in the GE comparison data set.
4 Aggregate earnings for the subset of GE programs with passing ratings were higher than the
5 aggregate earnings for all schools and programs overall. Higher earnings for the GE comparison
6 data set resulted, generally, in larger differences between the mean and median earnings of a
7 specific GE comparison program and academic credential group and those of the corresponding
8 CCI program and academic credential group's earnings.
9

10 27. To similar effect, although GE earnings data only includes information for students who
11 completed their programs, in determining the average and median earnings for each of the CCI
12 program and academic credential groups, we included the earnings of all CCI students who had
13 borrower defense claims—even those who had failed to complete their programs. Including non-
14 completers in the CCI earnings data was determined to have the likely effect of decreasing the
15 aggregate CCI students' earnings amounts, contributing to even larger differences between the
16 GE programs' and CCI programs' earnings we compared—and hence, to have the likely effect of
17 increasing the percentage of loan discharge relief to a CCI borrower defense claimant.
18

19 28. In addition, some of the CCI school locations had passing GE rates. However, program
20 earnings from those school locations were not included in the GE comparison data set. This
21 approach was considered more favorable for borrowers because former CCI student earnings
22 were generally expected to be lower than earnings from students at similar institutions, and
23 excluding CCI programs from the GE comparison data would provide a more accurate, distinct
24 comparison between the earnings of former CCI students that were the subject of borrower
25 defense claims — many of whom did not complete their programs and thus were assumed to
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1 have lower earnings as a result — and those of former students who had completed similar
2 passing GE programs at other schools.

3 29. The OCFO performed four different calculations, based upon comparisons of (a) either
4 the mean or median earnings of former CCI students in a program and credential level, to (b) one
5 of the mean earnings, median earnings, weighted average mean earnings, or median of the
6 median earnings, of former students who completed programs with the same CIP code with the
7 same credential level that had passing GE scores.

9 30. The OCFO also established other rules of application for where there was little or no data
10 in the GE comparison data set that correlated to a program in the CCI earnings data set. These
11 are discussed in more detail at Step 3 of the December 15, 2017 memorandum.

13 31. The OCFO, FSA, and OGC considered the comparison results and different approaches
14 for applying the results to calculate amounts of relief, in terms of amounts of Federal student
15 loans discharged and reimbursements of loan payments already made to the Secretary by CCI
16 borrower defense claimants. The decisions about how relief amounts were to be calculated and
17 implemented are described in Steps 4 to 6 of the December 15, 2017 memorandum.

19 32. As described in Step 4 of the December 15, 2017 memorandum, generally the decisions
20 were to:

- 21 a. Provide 100% relief for CCI borrower defense claimants where CCI students had
22 enrolled in programs that the Department's analysis showed CCI students, in the
23 aggregate, were earning less than 50% of the earnings (as determined was most
24 favorable to the borrower, as discussed above as to Step 3) of all former students who
25 had completed GE-passing programs with the same CIP code and credential level;
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1 b. Provide inverse relief for CCI borrower defense claimants that had enrolled in
2 programs for which CCI students were earning between 50% to 90% of what all
3 former students who had completed GE-passing programs with the same CIP code
4 and credential level, in increments of 10 percentage points, to be rounded up to the
5 nearest 10th percentage point resulting in additional relief provided to the borrower;
6 and
7

8 c. To provide at least 10% relief for CCI borrowers, even if the Department's
9 comparative analysis showed that the mean or median earnings of CCI students
10 (whichever were lower and more favorable to the borrower) were similar to or higher
11 than the highest of the four calculations of earnings of those who had completed GE-
12 passing programs with the same CIP code and credential level.
13

14 33. Appendices A, C, and D of the December 15, 2017 memorandum list the associated
15 percentages of relief for CCI borrower defense claimants with claims pertaining to certain
16 programs and academic credential levels.
17

18 34. Appendix A has red, yellow, and green shading for different percentages of relief to
19 visually highlight the variability in relief tiers. Boxes shaded in red are for programs and
20 credential types for which borrowers will receive 100% relief, under the relief methodology.
21 Boxes shaded in yellow are for programs and credential types for which borrowers will receive
22 30% to 50% levels of relief, and boxes shaded in green are for programs and credential types for
23 which borrowers will receive 10% to 20% levels of relief.
24

25 35. To ensure the accuracy of the analyses, we conducted several levels of review of the data
26 and calculations. Within OCFO, multiple staff reviewed the mapping of programs listed in
27 borrower defense claims to CIP codes and to passing GE programs' earnings comparisons to
28

1 check for and correct any errors. In addition, staff in FSA and OGC also reviewed and spot-
2 checked the data throughout the development of the relief methodology.

3 36. The OCFO concluded its role in consulting with FSA on the relief methodology for CCI
4 claims in December of 2017. OCFO is not involved in the implementation of the relief
5 methodology for CCI borrower defense claims.
6

7
8 I declare under penalty of perjury, pursuant to the provisions of 28 U.S.C. § 1746, that the
9 foregoing is true and correct.

10 Executed on this 12th day of April, 2018.

11
12 
13 Phillip Juengst
14 Senior Advisor
15 Office of the Chief Financial Officer
16 United States Department of Education
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EXHIBIT 1

December 15, 2017

Borrower Defense Relief Methodology for CCI Claims¹

Purpose

This document describes the methodology used to calculate the amount of relief to award former Corinthian Colleges Inc. (CCI) students with borrower defense claims eligible for approval under existing Job Placement Rate (JPR), Guaranteed Jobs, and Transferability of Credits claim theories. This methodology was developed to provide borrowers relief consistent with and appropriate to the harm they incurred from the misrepresentation by CCI, thereby making them whole. It is rooted in a determination of the value of the claimant's CCI education, as calculated by comparing average earnings of CCI claimants who attended a given academic program to those who attended similar programs at schools the Department has determined adequately prepare students for gainful employment.

Methodology

Step 1: Map all CCI claims to official classification codes and credentials

In order to compare the value of a CCI claimant's education against other students, it was necessary to ensure the Department had an accurate record of the particular title IV CCI academic Program Name(s) and credential (level of degree or certificate for the program) the borrower had enrolled in and attended. Federal Student Aid (FSA) enlisted the assistance of the Office of the Chief Financial Officer (OCFO) to map all CCI claims to official program classification codes established by the National Center for Education Statistics. These codes, known as the Classification of Instructional Programs (CIPs), provide a taxonomic scheme that supports the accurate tracking and reporting of fields of study and program completions activity. CIPs are also used as one of the identifiers comprising a Gainful Employment (GE) Program, the others being the credential level and OPEID ID number.

(For purposes of this exercise, hereinafter a "CCI Program/Credential Group" consists of a specific CIP code, its corresponding CIP Description, and a specific credential. This is essentially the equivalent of a GE Program for comparison purposes. "CCI Program/Credential Group" is different from the "Program Name" that is a narrower identifier than a CIP Code. A CIP Program/Credential Group will typically encompass multiple Program Names.)

FSA provided to OCFO files containing summary data for 68,836 claims from former CCI students. These files contained both the Program Name(s) of study and credential obtained by former CCI students as reported on their applications for relief, as well as the Program Name(s) of study and credentials obtained for these individuals as previously reported to the Department by Zenith Education Group, an education entity that acquired a majority of CCI campuses in 2015 after CCI ceased operations.

As the borrower or Zenith-provided Program Names and credentials in these claims were not uniform and did not always match the Department's official list of Program(s) Names offered by CCI (in most cases due

¹ This document reflects work performed by the OCFO, FSA, and the OGC. OPE also consulted on the project in its early stages.

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to abbreviations, misspellings, or because of the inclusion of informal or inaccurate program titles), OCFO developed a 3-part process for ensuring borrowers were uniformly assigned to the correct CCI Program/Credential Group:

Step 1a) OCFO developed and applied a series of formulas to files of claims to automate the cleaning of the data, and to cross-walk the various reported CCI Program Names and credentials to the “CIP Description” and “Program Name” data for CCI institutions as reflected in the Department’s Postsecondary Education Participants System (PEPS). The CIP Description was mapped to official CIP codes (located here: <https://nces.ed.gov/ipeds/cipcode/>), and credentials were mapped to the following categories:

Certificate or Diploma	Associate’s Degree	Bachelor’s Degree	Master’s Degree
01	02	03	05

Step 1b) OCFO sorted and manually cross-walked claims, correcting for any errors generated by the automated cleaning and mapping. At this step of the process, three key decision rules were applied to claims:

- 1) If there was a discrepancy between the CCI Program Name and/or credential as reported by the individual and as reported by Zenith, the claim was mapped to the Program Name found in the data provided by Zenith. This is because, as a general rule, we found the Zenith data to be more accurate and closely aligned to the Department’s official list of former title IV eligible CCI Program Names.
- 2) If a student or Zenith reported multiple programs, the claim was mapped to the first Program Name listed. This is because the first Program Name was most commonly associated with the primary claim submitted by the student
- 3) If no credential information was available, the claim was mapped to the most common credential earned by CCI students for that Program Name. This is because the most common credential was likely to be accurate from a statistical standpoint.

OCFO then combined all claims into a single file and conducted another round of sorting and cross-walking to identify and correct any inconsistencies or errors. The combined claim file contained the final cross-walk between the Program Name(s) and credential reported by former CCI students in their applications, the information provided by Zenith, and the CCI Program/Credential Code and credential to which the claim was mapped.²

Step 1c) OCFO and FSA staff reviewed the combined claim data file in an effort to identify and correct any inconsistencies or errors. OCFO, FSA, and Office of the General Counsel (OGC) staff reviewed the mapping decisions for claims with somewhat ambiguous information to determine how best to map

² Having all of this information in one record will be helpful if later there is any need to research any potential discrepancies about why a borrower was placed in a given CCI Program/Credential Group.

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those CCI program(s) Names to the appropriate CIP code and credential.³ A list of the CCI Program Names with corresponding CIP codes is attached as Appendix B.

Step 2: Submit claims to the Social Security Administration (SSA) for income information

FSA used an existing interagency agreement with the SSA to calculate earnings data for former CCI students. Using a file template required by SSA, OCFO extracted the requisite data from the combined claim file and prepared it for submission to SSA. This included adding a field with date of birth, grouping claims by CIP code and credential to exclude individuals in groups with fewer than 10 claims, and sorting data to identify and correct or remove any files containing missing or duplicate Social Security Numbers. FSA reviewed the file and corrected or removed any data containing missing or duplicate names, reconciling names with official FSA records.

FSA sent the names of 61,717 former CCI students to SSA, organized by 79 CCI Program/Credential Groups. SSA provided to FSA the mean and median incomes for these 79 groups, based on 2014 earnings data—the most current year of Gainful Employment reporting data to be used for comparison. SSA reported a match rate of 99.25% indicating the individual borrower data was incredibly accurate.

Step 3: Compare 2014 earnings of CCI students to 2014 earnings of students from “passing” Gainful Employment programs

FSA, OCFO, and OGC agreed, as a guiding principle, to use earnings comparisons most favorable to CCI students. OCFO compared 2014 earnings of CCI students in a CCI Program Credential/Group against 2014 earnings of students completing programs with the same CIP code and credential that earned passing scores as part of the programs in the Department’s GE program (a list of the GE data is available here: <https://studentaid.ed.gov/sa/about/data-center/school/ge>). There were CCI programs which had passing GE scores. These CCI programs were excluded from the GE comparison set, as that was more favorable to CCI students and provided for a more distinct comparison of GE earnings between CCI and non-CCI programs. For each of the 79 program/credential groupings, OCFO calculated the following data:

1. Mean CCI earnings divided by average mean earnings of passing schools
2. Mean CCI earnings divided by weighted⁴ average mean earnings of passing schools
3. Median CCI earnings divided by average median earnings of passing schools
4. Median CCI earnings divided by median of the median earnings of passing schools

For each of the 79 CCI Program/Credential Groups, OCFO identified the GE earnings data comparison approach most favorable to CCI students (of the four above, the one approach that resulted in the

³ Claims without program information were left blank, and those individuals were later excluded from the data submitted to SSA.

⁴ The weighted average accounted for the number of students reported. For example, rather than treat the earnings of a GE passing school that reported 25 students the same as the earnings of a school that reported 250 students, this calculation took into account the sample size of students for each GE passing school and weighted them accordingly.

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lowest comparative percentage earnings for CCI students). OCFO analyzed the results, including the earnings of students from across similar programs, and made the following adjustments when it resulted in a more favorable comparison:

- For credentials with limited (1-3 schools reporting) or no GE data with which to compare, OCFO adjusted the result to the credential within the same CIP Code with the most favorable comparison to the borrower. Similarly, some CCI borrowers were not sent to SSA because they were part of a CCI Program/Credential Group consisting of students enrolled in a program whose credential level had fewer than 10 students for which the Department had data. For these Groups that were likely to have approved claims, OCFO assigned to the borrower the most favorable earnings comparison within the same CIP Code.⁵
- For CCI CIP Codes with no corresponding GE program classification data with which to compare, OCFO used the closest possible GE match. When there were multiple similar classifications to choose from OCFO opted to use the GE classification most favorable to the borrower.
- For CCI CIP Codes that were not commonly reported by passing programs or for which there were similar CIP codes for reporting (such as “other” CIP codes within a category of programs), OCFO adjusted the result to the most favorable comparison among similar classifications.⁶

Step 4: Analyzing Results and Determining Formula for Relief

FSA, OCFO and OGC analyzed the results of the comparisons, and considered various approaches for applying relief on the basis of the comparative earnings with the primary consideration making CCI students whole. Based on that analysis and consideration the following decisions were made:

1. 100% relief will be provided for all borrowers with claims who we determined were enrolled in a CCI Program/Credential Group whose average earnings for the group were less than 50% of earnings of comparable passing GE programs. This results in a large number of CCI Programs/Credential Groups (19 of the 83 groups) receiving full relief, and recognizes that programs producing such low comparative earners did not, by and large, provide measurable value to CCI students.
2. Claimants enrolled in a CCI Program/Credential Group with earnings between 50% and 90% of earnings of passing GE programs will be awarded relief in amounts inverse with their earnings. For example, a CCI borrower enrolled in a program included in a CCI Program/Credential Group with earnings of 60% of the average GE earnings will receive 40% relief. Relief amounts will be

⁵ The results of these adjustments added Groups to the total number of CIP codes and credentials compared. For example, the Department has claims mapped to the Certificate, Associate's, and Bachelor's credentials for the Homeland Security CIP. Only 2 of these groupings were sent to SSA, and GE comparison earnings are available for only 1, which resulted in 100% relief. All 3 credential groupings were set to 100% relief.

⁶ For example, the Department's PEPS data originally mapped CCI programs related to information technology network administration or network security to CIP code 119999. However, the Department determined that CIP code 111001, Network and System Administration, was a better fit and resulted in a greater percentage relief when comparing to GE earnings.

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rounded up to the nearest 10 percentage-point increment. For example, students in CCI Program/Credential Groups included in classifications with comparative earnings of 50-59% will receive 50% relief. This results in higher levels of relief than would be provided using smaller increments (such as CCI Programs/Credential Groups with earnings of 55-59% receiving only 45% relief). In addition, rounding up in large increments, along with all the other borrower-friendly adjustments already discussed, mitigates possible data imprecision that would be more likely to impact relief levels if calculated in smaller increments.⁷ Finally, this approach also eases the business process difficulties in administering unique relief percentages for each borrower receiving partial relief.

3. A minimum of 10% relief will be provided for all borrowers with approved claims, including those enrolled in CCI Programs/Credential Groups with earnings greater than passing GE programs. This recognizes that, although the value of the education in certain CCI programs was comparatively high, the Department did not include an examination of factors unique to each student that could otherwise merit some relief for a particular student or lead the Department to conclude no relief was appropriate. For example, we did not examine how well a student performed in school, how aggressively a student sought employment in their field of study, whether a student was employed in their field of study, or whether a student's earnings were low for the field of study within their geographic location. Given the relative lack of information regarding harm provided by borrowers in their claims it was not possible to conduct an individualized determination of relief on a case-by-case basis.

A table matching the CIP Codes to the percentage relief by credential level is included as Appendix A.

Step 5: Relief Percentages and Programs from Appendices A and B Matched to Programs and Credentials at each CCI School

Next, in order to apply the relief percentages in Appendix A to approved CCI Programs at each CCI school, FSA developed more detailed crosswalks. FSA searched for each CCI Program and credential listed in Appendices C and D on the Crosswalk in Appendix B ("Crosswalk of CIP Codes and Descriptions to CCI Program Names"), identified the CIP Code under which the CCI Program was listed in the Crosswalk, and then found the corresponding CIP Code and Credentials on Appendix A. FSA then found on Appendix A the assigned percentage for the CIP Code and Credential and recorded that percentage in Appendix C. The process was repeated for each CCI Program and Credential listed in Appendix C.⁸ The same process was repeated for each CCI Program and Credential in Appendix D.

⁷ Possible data imprecision could be due to factors such as a school making an error in the data reported for GE, or the Department making an error in mapping a student to a program/credential for purposes of calculating CCI earnings.

⁸ In consultation with OCFO, FSA used exact matches from the Crosswalk to record on Appendices C and D. Where there was not an exact match, FSA recorded an "X." The absence of an exact match on the Crosswalk indicates that there were not a sufficient number of students to determine relief using the methodology described in this paper. Note that CCI did not have a Program at every Credential Level. For any approved CCI claim for which the percentage relief is not included in Appendices C or D, the relief is still to be determined. As such, this Methodology and the Appendices subsequently may be amended as those decisions are made.

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Step 6: Process for applying relief methodology to each claim

The following is a summary of the process to determine relief for former CCI students with borrower defense claims eligible for approval:

1. This relief methodology along with legal analysis and conclusions by OGC documented in a formal memorandum, serve as the framework for approving and awarding relief for CCI claims approved under existing Job Placement Rate (JPR), Guaranteed Jobs, and Transferability of Credits claim groups.
2. FSA will apply the corresponding percentage of relief to be awarded using Appendix C for Everest and WyoTech approved claims and using Appendix D for Heald claims. The process of applying the relief percentage, notifying students, and discharging (or denying) claims is documented in FSA procedures.
 - a. FSA will examine the Program Name(s) and credential(s) reported on the application for relief for each former CCI student, as well as the Program Name(s) and credential(s) reported for that student by Zenith.
 - b. For eligible Programs, FSA will determine the percentage relief based on the student's program/credential that is most favorable. For example, if a student reported that he or she was in multiple programs of study, or there is a discrepancy between the data reported by the student and Zenith, FSA will award the level of relief (*e.g.*, 10%, 20%, etc.) that is highest among those CCI Program/Credential Groups.

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Appendix A: Table for Matching CIP Codes to Percentage Relief by Credential Level

CIP Code	CIP Description	Relief % Awarded			
		Certificate	Associates	Bachelors	Masters
110101	Computer and Information Sciences, General	100.0%	100.0%	100.0%	
111001	Network and System Administration/Administrator	10.0%	40.0%		
111006	Computer Support Specialist	100.0%			
150303	Electrical, Electronic and Communications Engineering Technology/Technician	30.0%	20.0%		
220302	Legal Assistant/Paralegal	100.0%	50.0%	100.0%	
430103	Criminal Justice/Law Enforcement Administration	100.0%	50.0%	50.0%	40.0%
430107	Criminal Justice/Police Science		100.0%		
430301	Homeland Security	100.0%	100.0%	100.0%	
460201	Carpentry/Carpenter	30.0%			
460302	Electrician	20.0%			
460503	Plumbing Technology/Plumber	30.0%			
470101	Electrical/Electronics Equipment Installation and Repair, General		50.0%		
150501	Heating, Air Conditioning and Refrig. Technol/Tech (ACH/ACR/ACHR/HRAC/HVAC/AC)	30.0%			
470201	Heating, AC, Ventilation and Refrig Main. Techlogy/Techn. (HAC,HACR,HVAC,HVACR)	30.0%			
470603	Autobody/Collision and Repair Technology/Technician	10.0%	30.0%		
470604	Automobile/Automotive Mechanics Technology/Technician	10.0%	10.0%		
470605	Diesel Mechanics Technology/Technician	20.0%	20.0%		
470611	Motorcycle Maintenance and Repair Technology/Technician	30.0%			
470616	Marine Maintenance/Fitter and Ship Repair Technology/Technician	10.0%			
500602	Cinematography and Film/Video Production		100.0%		
510601	Dental Assisting/Assistant	30.0%	40.0%		
510701	Health/Health Care Administration/Management		40.0%	40.0%	
510705	Medical Office Management/Administration	20.0%	30.0%		
510707	Health Information/Medical Records Technology/Technician		10.0%		
510714	Medical Insurance Specialist/Medical Biller	20.0%	20.0%		
510716	Medical Administrative/Executive Assistant and Medical Secretary	30.0%	10.0%		
510801	Medical/Clinical Assistant	30.0%	30.0%		

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CIP Code	CIP Description	Relief % Awarded			
		Certificate	Associates	Bachelors	Masters
510805	Pharmacy Technician/Assistant	20.0%	10.0%		
510908	Respiratory Care Therapy/Therapist		30.0%		
510909	Surgical Technology/Technologist	50.0%	30.0%		
511011	Renal/Dialysis Technologist/Technician	10.0%			
513501	Massage Therapy/Therapeutic Massage	20.0%			
513801	Nursing/Registered Nurse (RN, ASN, BSN, MSN)	40.0%	100.0%	100.0%	
513901	Licensed Practical/Vocational Nurse Training	20.0%	40.0%		
513902	Nursing Assistant/Aide and Patient Care Assistant/Aide.	20.0%			
520201	Business Administration and Management, General	100.0%	50.0%	100.0%	100.0%
520299	Business Administration, Management and Operations, Other	100.0%	50.0%	100.0%	100.0%
529999	Business, Management, Marketing, and Related Support Services, Other	100.0%	50.0%	100.0%	100.0%
520301	Accounting	50.0%	50.0%	50.0%	
520305	Accounting and Business/Management	50.0%	50.0%	50.0%	
520401	Administrative Assistant and Secretarial Science, General	10.0%			
520407	Business/Office Automation/Technology/Data Entry		10.0%		
520408	General Office Occupations and Clerical Services	20.0%			
520499	Business Operations Support and Secretarial Services, Other	20.0%	20.0%		
520701	Entrepreneurship/Entrepreneurial Studies		50.0%		
520901	Hospitality Administration/Management, General		20.0%		
521801	Sales, Distribution, and Marketing Operations, General		50.0%		
522001	Construction Management		50.0%		

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Appendix B: Crosswalk of CIP Codes and Descriptions to CCI Program Names**CIP: 110101**

CIP Description: Computer and Information Sciences, General**Zenith and Borrower-Provided Program Names:⁹**

Business Software Applications
 Computer Applications
 Computer Business Administration
 Computer Information Science
 Computer Information Science (AAS)
 Computer Information Science-Programming
 Computer Information Science-Web Design
 Computer Information Technology
 Computer Science
 Computer Software Applications
 Computer Technology
 Information Systems
 Multimedia Production
 Software Technologies

111001

Network and System Administration/Administrator

CIS-Network Administration
 Computer Science/Network
 Information Technology - Emphasis in Network Security
 Information Technology - Emphasis in Network Sys Adm
 IT - Network Systems Admin
 Information Technology Network Security
 IT Network Security
 Network Administration
 Network Internet Security Spec
 Network Systems Support
 Networking Technology - Emphasis in CCNA Curriculum
 Networking Technology - Emphasis in Microsoft Windows Server Administration
 NT - CCNA Curriculum
 NT - Cisco Systems
 NT - Windows NT
 Networking Technology, Emphasis in CCNP« Curriculum – CERT
 Networking Technology, Microsoft and Cisco Systems Administration
 Networking Technology, Microsoft Emphasis – CERT

⁹ The Program Names include the official program names listed in PEPS, the names reported by Zenith for individual borrowers, and the borrower-provided names. Similar CIP Codes for which relief levels were identical were grouped together for purposes of this Crosswalk.

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Networking Technology, Microsoft Windows 2000
 Web Administration
 Web Administration Diploma
 Web Design
 Web Design and Administration
 Web Design and Administration, Web Design
 Web Development
 Web Security

111006**Computer Support Specialist**

IT - Technical Support
 IT Support Specialist
 Information Technology Support Specialist

150303**Electrical, Electronic and Communications Engineering Technology/Technician**

Electrical technology
 Electronics and Computer Technology
 Electronics Computer Technology
 Electronics Technology

220302**Legal Assistant/Paralegal**

Legal Assistant/Paralegal
 Paralegal
 Paralegal (AAS)
 Paralegal/Legal Assistant

430103**Criminal Justice/Law Enforcement Administration**

Bus Admin - Criminal Justice
 Business Administration – Criminal Justice
 Business Administration - Emphasis in Criminal Justice
 Criminal Justice
 Criminal Justice - Homeland Security
 Criminal Justice – Investigations
 Criminal Justice Administration
 Criminal Justice Private & Homeland Security
 Criminology

430107**Criminal Justice/Police Science**

Crim. Invest.
 Criminal Investigation
 Crime Scene Investigation
 Crime Scene Technician

430301

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Homeland Security

Homeland Security

Homeland Security Specialist (Diploma)

460201**Carpentry/Carpenter**

Carpentry

460302**Electrician**

Electrical Technician

Electrician

Electrician/Industrial Electrical Tech

Electronics, Computers, & Industrial

Electrician with Industrial Electrical Technology Concentration

Electrician with Renewable Energy and Photovoltaics Concentration

Industrial Electrical Technology

Industrial Electrical Technology (Diploma)

460503**Plumbing Technology/Plumber**

Plumbing

Plumbing Technician

Plumbing Technology

470101**Electrical/Electronics Equipment Installation and Repair, General**

Electronic Computer and Communication

Electronics, Computer, and Communications Technology

150501 and 470201**Heating, Air Conditioning and Refrig. Technol/Tech****(ACH/ACR/ACHR/HRAC/HVAC/AC)****Heating, AC, Ventilation and Refrig Main. Techlogy/Tech. (HAC,HACR,HVAC,HVACR)**

Air Conditioning, Heating, Refrigeration & Appliances

Commercial Heating Ventilation & Air Conditioning

Heating, Ventilation & Air Conditioning

Residential Heating, Ventilation and Air Conditioning Technician

Residential Heating Vent and AC

Residential Heating Ventilation and Air Conditioning

Heating, Ventilation and Air Conditioning

Air Conditioning, Heating and Refrigeration - ATI Teachout

Air Conditioning, Heating, Refrigeration & Appliances - ATI Teach-out Program

AOS / Concentration in Service Systems - Climate Control & Refrig Tech

Assoc Applied Science - Climate Control & Refrigeration Tech

Climate Control & Refrigeration Technology

Commercial / Industrial Heating Ventilation & Air Conditioning

Commercial Heating, Ventilation & Air Conditioning

Heating, Ventilation & Air Conditioning

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Heating, Ventilation & Air Conditioning with Renewable Energy and Photovoltaics
 Heating, Ventilation and Air Conditioning
 Heating, Ventilation and Air Conditioning- TX
 Heating, Ventilation, Air Conditioning Technician
 Heating, Ventilation, and Air Conditioning

470603**Autobody/Collision and Repair Technology/Technician**

Auto Body
 Automotive
 Automotive Mechanics
 Automotive Repair
 Automotive Specialist
 Chassis Fabrication and High Performance Engines with Collision/Refinishing Tech
 Collision/ Refinishing Technology with Off-Road Power
 Collision Refinishing Tech
 Collision Repair
 Collision/Refinishing & Upholstery Technology
 Collision/Refinishing Technician
 Collision/Refinishing Technology (Concentration Motorsports Chassis Fabrication)
 Collision/Refinishing Technology (Concentration Trim & Upholstery Technology)
 Collision/Refinishing Technology (Concentration Street Rod & Custom Fabrication)
 Collision/Refinishing Technology and Management
 Collision/Refinishing Technology w/ Motorsports Chassis Fabrication and
 Management
 Collision/Refinishing Technology w/ Street Rod and Management
 Collision/Refinishing Technology with Specialty Auto Fabrication
 Street Rod & Custom Fabrication w/ Collision/Refinishing Technology
 Street Rod Building & Auto Customizing with Collision/Refinishing Tech.
 Trim and Upholstery
 Collision Technology (all credential levels)
 Collision/Refinishing (all credential levels)
 Collision/Refinishing with Specialization in Automotive Fabrication (Diploma)

470604**Automobile/Automotive Mechanics Technology/Technician**

Advanced Diagnostics
 AOS Automotive Technology-Automotive Diagnostics
 AOS Automotive Technology-Service Management
 AOS-Automotive Technology/Automotive Diagnostics
 Applied Automotive Technology
 Auto Tech
 Automotive Technician
 Automotive Technology - (Concentration Upholstery Technology
 Automotive Technology (Concentration Advanced Automotive Diagnostic)
 Automotive Technology (Concentration High Performance Power Trains)

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Automotive Technology (Concentration Motorsports Chassis Fabrication)
 Automotive Technology (Concentration Street Rod & Custom Fabrication)
 Automotive Technology (Concentration Motorsports)
 Automotive Technology (Concentration St. Rod)
 Automotive Technology and Management
 Automotive Technology w/ Advanced Automotive Diagnostics
 Automotive Technology w/ High Performance Power Trains
 Automotive Technology w/ Motorsports
 Automotive Technology w/ Motorsports Chassis Fabrication and Management
 Automotive Technology w/ Street Rod and Management
 Automotive Technology w/ Trim & Upholstery Technology
 Automotive Technology with Specialty Auto Fabrication
 Automotive Technology with High Performance Power Transmission (Diploma)
 Automotive Technology-Automotive Diagnostics
 Applied Automotive Technology - Advanced Diagnostics Concentration (Diploma)
 Automotive Technology/ Concentration in Automotive Diagnostics (Associate)
 Automotive Technology/ Concentration in Service Management (Associate)
 Automotive Technology (Diploma)
 Street Rod & Custom Fabrication w/ Automotive Technology

470605**Diesel Mechanics Technology/Technician**

Advanced Diesel Technology
 Diesel Technology Advanced (Diploma)
 Diesel/Automotive Vehicle Technology (Diploma)
 Auto Technology (Concentration Diesel)
 Automotive Technology with Light Duty Diesel (Diploma)
 Diesel Technology with High Performance Power Transmission (Diploma)
 Auto/Diesel Vehicle Technology
 Chassis Fabrication and High Performance Engines with Diesel Technology
 Diesel
 Diesel Auto Vehicle Technology
 Diesel Automotive Technology
 Diesel Mechanic
 Diesel Tech
 Diesel Technology (all credential levels)
 Diesel Technician
 Diesel Technology (Concentration Advanced Diesel)
 Diesel Technology (Concentration Automotive)
 Diesel Technology (Concentration Motorsports Chassis Fabrication)
 Diesel Technology (Concentration Street Rod & Custom Fabrication)
 Diesel Technology and Management
 Diesel Technology w/ High Performance Power Trains
 Diesel Technology w/ Light Duty Diesel
 Diesel Technology w/ Trim & Upholstery Technology
 Motorsports Chassis Fabrication w/ Diesel Technology

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Street Rod & Custom Fabrication w/ Diesel Technology

470611**Motorcycle Maintenance and Repair Technology/Technician**

Motorsports Chassis Fabrication

Motorsports Chassis Fabrication w/ Automotive Technology

Motorsports Chassis Fabrication w/ Automotive Technology

Motorsports Chassis Fabrication w/ Collision/Refinishing Technology

Harley-Davidson and Motorcycle

Motorcycle Technician

Motorcycle Technology

Motorcycle Technology - European Concentration

Motorcycle Technology- Harley Davidson Concentration

Motorcycle Technology Asian Concentration

Applied Automotive Technology - Motorsports Concentration

Motorcycle Technology and Management

Comprehensive 25 Week Multi-Line Program

Comprehensive 30 Week Multi-Line Program

MDBMW Motorcycle Mechanics, Dealership Management & BMW Advanced

Training

MDDUC Motorcycle Mechanics Dealership Management & Ducati Advanced

Training

MDH Harley-Davidson & Motorcycle Mechanics/Dealership Management

MDHON Motorcycle Mechanics, Dealership Management & Honda Advanced

Training

MDKAW Motorcycle Mechanics, Dealership Management & Kawasaki Advanced

Training

MDSUZ Motorcycle Mechanics, Dealership Management & Suzuki Advanced

Training

MDTRI Motorcycle Mechanics, Dealership Management & Triumph Advanced

Training

MDYAM Motorcycle Mechanics, Dealership Management & Yamaha Advanced

Training

MH - Harley -Davidson Motorcycle Mechanics Training

Motorcycle Technician

Motorcycle Technician with Off Road Power

470616**Marine Maintenance/Fitter and Ship Repair Technology/Technician**

Marine Specialist – Advanced

Marine Specialist

Marine Technology

500602**Cinematography and Film/Video Production**

Film and Video

510601**Dental Assisting/Assistant**

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Dental Assist.
 Dental Assistant
 Dental Assisting
 Dental technician

510701**Health/Health Care Administration/Management**

Health Care Admin
 Health Care Administration
 Health Services Administration

510705**Medical Office Management/Administration**

Medical Office Administration
 Medical Office Management
 Medical Secretary

510707**Health Information/Medical Records Technology/Technician**

Health Information Technology

510714**Medical Insurance Specialist/Medical Biller**

Medical Coding
 Med Ins Bill & Coding
 Med Ins Billing/Coding
 Med Insurance Billing & Coding
 Medical Billing
 Medical Insurance Billing & Coding
 Medical Insurance Billing and Coding

510716**Medical Administrative/Executive Assistant and Medical Secretary**

Administrative Assistant-Medical
 Administrative Medical Assist
 Administrative Medical Assistant
 Medical Admin Assistant
 Medical Administrative Assistant
 Medical Administrative Secretary

510801**Medical/Clinical Assistant**

Medical Assist.
 Medical Assistance
 Medical Assistant
 Medical Assistant (AAS)
 Medical Assisting

510805**Pharmacy Technician/Assistant**

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Pharmacy Tech
 Pharmacy Technician
 Pharmacy Technology

510908**Respiratory Care Therapy/Therapist**

Respiratory Care

510909**Surgical Technology/Technologist**

Surgical Tech
 Surgical Technologist
 Surgical Technology

511011**Renal/Dialysis Technologist/Technician**

Dialysis Technician

513501**Massage Therapy/Therapeutic Massage**

Massage Therapist
 Massage Therapy
 Massage Therapy Spa Specialist
 Massage Therapy Sports Specialist
 Advanced Massage Therapist
 Massage Therapy- Norcross
 Professional Licensing and Aromatherapy and Spa Specialist Program
 Professional Licensing and Clinical and Sports Massage Specialist

513801**Nursing/Registered Nurse (RN, ASN, BSN, MSN)**

Nursing

513901**Licensed Practical/Vocational Nurse Training**

Licensed Practical Nursing
 LPN
 Practical Nurse
 Practical Nursing
 Vocational Nursing

513902**Nursing Assistant/Aide and Patient Care Assistant/Aide.**

Nursing Assistant
 Nurse Assistant /Home Health Aide
 Patient Care Technician
 Patient Care Technology

520201 and 520299 and 529999

Business Administration and Management, General
Business Administration, Management and Operations, Other

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Business, Management, Marketing, and Related Support Services, Other

Applied Management
 Business
 Business Administration
 Business Administration (AAS)
 Business Administration (AS)
 Business International
 Business Management
 General Management
 International Business
 Management/Marketing

520301 and 520305

Accounting**Accounting and Business/Management**

Accounting
 Accounting (AAS)
 Accounting/Business Administration
 Bus Admin – Accounting
 Business Accounting
 Business Administration – Accounting
 Business Administration-Emphasis in Accounting

520401

Administrative Assistant and Secretarial Science, General

Administrative Assistant
 Administrative Secretary
 Bus Mgmt/Admin Assist.
 Business Management / Administrative Assistant
 Career Access
 Career Access Program
 Computer Office Administrative Specialist

520407

Business/Office Automation/Technology/Data Entry

Administrative Information Processing
 Business Admin, Software Technologies Emphasis – CCNA
 Business Administration-Emphasis in Software Technologies
 Business Administration – Software Technologies
 Business Software Applications
 Information Processing Specialist

520408

General Office Occupations and Clerical Services

Office Skills

520499

Business Operations Support and Secretarial Services, Other

Administrative and Secretarial Services, Other

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Administrative Assistant
 Admin Office Technology
 Administrative Office Technology - Executive
 Administrative Office Technology - Legal
 Administrative Office Technology - Me
 Administrative Office Technology - Medical
 Administrative Secretary
 Automated Office Technology
 Business Office Administration
 Business Operations
 Office Administration
 Computer Office Technologies and Applications
 Computer Office Technology and Applications (all credential levels)
 Computerized Office Applications
 Microsoft Office User Specialist
 Office Administration
 Office Assistant / Data Entry
 Word Processing Specialist

520701**Entrepreneurship/Entrepreneurial Studies**

Business Administration - Emphasis in Entrepreneurship
 Entrepreneurship

520901**Hospitality Administration/Management, General**

Bus Admin - Hospitality & Tourism
 Business Administration-Emphasis in Hospitality and Tourism
 Business Administration - Hospitality/Tourism
 Hospitality Management
 Travel and Tourism
 Travel Studies
 Travel/Hospitality

521801**Sales, Distribution, and Marketing Operations, General**

Bus Admin - Sales & Marketing
 Business Administration-Emphasis in Sales and Marketing
 Business Administration - Sales/Marketing Emphasis
 Business Marketing
 Business Sales & Customer Service

522001**Construction Management**

Construction Management

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Appendix C: Everest and WyoTech Findings List

STATE	CAMPUS/PROGRAM	FIRST DATE OF ENROLLMENT	PERCENT RELIEF
CA	Everest Alhambra-Business Operations (Diploma)	7/1/2010 – 9/30/2013	20
CA	Everest Alhambra-Dental Assistant (Diploma)	7/1/2010 – 9/30/2014	30
CA	Everest Alhambra-Massage Therapy (Diploma)	7/1/2011 – 9/30/2014	20
CA	Everest Alhambra-Medical Administrative Assistant (Diploma)	7/1/2010 – 9/30/2014	30
CA	Everest Alhambra-Medical Assistant (Diploma)	7/1/2010 – 9/30/2014	30
CA	Everest Alhambra-Medical Insurance Billing and Coding (Diploma)	7/1/2010 – 9/30/2014	20
CA	Everest Alhambra-Pharmacy Technician (Diploma)	7/1/2010 – 9/30/2013	20
CA	Everest Anaheim-Criminal Justice (Associate)	7/1/2013 – 9/30/2014	50
CA	Everest Anaheim-Dental Assistant (Diploma)	7/1/2010 – 9/30/2014	30
CA	Everest Anaheim-Medical Assistant (Diploma)	7/1/2010 – 9/30/2014	30
CA	Everest Anaheim-Medical Insurance Billing and Coding (Diploma)	7/1/2010 – 9/30/2013	20
CA	Everest City of Industry-Business Management/Administrative Assistant (Diploma)	7/1/2010 – 9/30/2014	10
CA	Everest City of Industry-Criminal Justice (Associate)	7/1/2012 – 9/30/2014	50
CA	Everest City of Industry-Dental Assistant (Diploma)	7/1/2010 – 9/30/2014	30
CA	Everest City of Industry-Massage Therapy (Diploma)	7/1/2010 – 9/30/2014	20
CA	Everest City of Industry-Medical Assistant (Diploma)	7/1/2010 – 9/30/2013	30
CA	Everest City of Industry-Medical Insurance Billing and Coding (Diploma)	7/1/2010 – 9/30/2014	20
CA	Everest City of Industry-Pharmacy Technician (Diploma)	7/1/2010 – 9/30/2014	20
CA	Everest Gardena-Dental Assistant (Diploma)	7/1/2010 – 9/30/2014	30
CA	Everest Gardena-Massage Therapy (Diploma)	7/1/2010 – 9/30/2014	20
CA	Everest Gardena-Medical Assistant (Diploma)	7/1/2010 – 9/30/2014	30
CA	Everest Gardena-Medical Insurance Billing and Coding (Diploma)	7/1/2011 – 9/30/2014	20
CA	Everest Gardena-Pharmacy Technician (Diploma)	7/1/2011 – 9/30/2014	20
CA	Everest Hayward-Massage Therapy (Diploma)	7/1/2010 – 9/30/2014	20
CA	Everest Hayward-Medical Administrative Assistant (Diploma)	7/1/2010 – 9/30/2014	30
CA	Everest Hayward-Medical Assistant (Diploma)	7/1/2010 – 9/30/2014	30
CA	Everest Hayward-Medical Insurance Billing and Coding (Diploma)	7/1/2011 – 9/30/2014	20
CA	Everest Los Angeles Wilshire-Dental Assistant (Diploma)	7/1/2010 – 9/30/2014	30
CA	Everest Los Angeles Wilshire-Massage Therapy (Diploma)	7/1/2010 – 9/30/2014	20
CA	Everest Los Angeles Wilshire-Medical Administrative Assistant (Diploma)	7/1/2010 – 9/30/2014	30
CA	Everest Los Angeles Wilshire-Medical Assistant (Diploma)	7/1/2010 – 9/30/2014	30
CA	Everest Los Angeles Wilshire-Medical Insurance Billing and Coding (Diploma)	7/1/2010 – 9/30/2014	20

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CA	Everest Los Angeles Wilshire-Pharmacy Technician (all credential levels)	7/1/2010 – 9/30/2014	20	10	x	x
CA	Everest Ontario-Dental Assistant (Diploma)	7/1/2010 – 9/30/2014	30			
CA	Everest Ontario-Massage Therapy (Diploma)	7/1/2011 – 9/30/2014	20			
CA	Everest Ontario-Medical Administrative Assistant (Diploma)	7/1/2010 – 9/30/2014	30			
CA	Everest Ontario-Medical Assistant (Diploma)	7/1/2010 – 9/30/2014	30			
CA	Everest Ontario-Medical Insurance Billing and Coding (Diploma)	7/1/2010 – 9/30/2014	20			
CA	Everest Ontario-Pharmacy Technician (Diploma)	7/1/2010 – 9/30/2014	20			
CA	Everest Ontario Metro-Accounting (Associate)	7/1/2010 – 9/30/2014	50			
CA	Everest Ontario Metro-Applied Management (Bachelor)	7/1/2011 – 9/30/2014	100			
CA	Everest Ontario Metro-Business (Associate)	7/1/2010 – 9/30/2014	50			
CA	Everest Ontario Metro-Business (Bachelor)	7/1/2010 – 9/30/2014	100			
CA	Everest Ontario Metro-Business Administration (AAS)	7/1/2010 – 9/30/2014	50			
CA	Everest Ontario Metro-Criminal Justice (Associate)	7/1/2010 – 9/30/2014	50			
CA	Everest Ontario Metro-Criminal Justice (Bachelor)	7/1/2010 – 9/30/2014	50			
CA	Everest Ontario Metro-Nursing (Associate)	7/1/2012 – 9/30/2014	100			
CA	Everest Ontario Metro-Paralegal (Associate)	7/1/2010 – 9/30/2014	50			
CA	Everest Reseda-Dental Assistant (Diploma)	7/1/2010 – 9/30/2014	30			
CA	Everest Reseda-Massage Therapy (Diploma)	7/1/2011 – 9/30/2014	20			
CA	Everest Reseda-Medical Administrative Assistant (Diploma)	7/1/2010 – 9/30/2014	30			
CA	Everest Reseda-Medical Assistant (Diploma)	7/1/2010 – 9/30/2014	30			
CA	Everest Reseda-Medical Insurance Billing and Coding (Diploma)	7/1/2010 – 9/30/2014	20			
CA	Everest Reseda-Pharmacy Technician (Diploma)	7/1/2010 – 9/30/2014	20			
CA	Everest Reseda-Surgical Technologist (Diploma)	7/1/2010 – 9/30/2014	50			
CA	Everest San Bernardino-Business (Associate)	7/1/2012 – 9/30/2014	50			
CA	Everest San Bernardino-Criminal Justice (Associate)	7/1/2011 – 9/30/2012; 7/1/2013 – 9/30/2014	50			
CA	Everest San Bernardino-Dental Assistant (Diploma)	7/1/2010 – 9/30/2014	30			
CA	Everest San Bernardino-Electrician (Diploma)	7/1/2010 – 9/30/2014	20			
CA	Everest San Bernardino-Massage Therapy (Diploma)	7/1/2010 – 9/30/2014	20			
CA	Everest San Bernardino-Medical Administrative Assistant (Diploma)	7/1/2010 – 9/30/2014	30			
CA	Everest San Bernardino-Medical Assistant (Diploma)	7/1/2010 – 9/30/2014	30			
CA	Everest San Francisco-Dental Assistant (Diploma)	7/1/2010 – 9/30/2014	30			
CA	Everest San Francisco-Massage Therapy (Diploma)	7/1/2010 – 9/30/2014	20			
CA	Everest San Francisco-Medical Assistant (Diploma)	7/1/2011 – 9/30/2014	30			
CA	Everest San Francisco-Pharmacy Technician (Diploma)	7/1/2010 – 9/30/2014	20			
CA	Everest San Jose-Dental Assistant (Diploma)	7/1/2010 – 9/30/2014	30			
CA	Everest San Jose-Massage Therapy (Diploma)	7/1/2010 – 9/30/2014	20			
CA	Everest San Jose-Medical Administrative Assistant (Diploma)	7/1/2010 – 9/30/2014	30			
CA	Everest San Jose-Medical Assistant (Diploma)	7/1/2010 – 9/30/2014	30			
CA	Everest San Jose-Medical Insurance Billing and Coding (Diploma)	7/1/2011 – 9/30/2014	20			

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CA	Everest Torrance-Medical Assistant (Diploma)	7/1/2012 – 9/30/2014	30				
CA	Everest Torrance-Pharmacy Technician (Diploma)	7/1/2012 – 9/30/2014	20				
CA	Everest West Los Angeles-Criminal Justice (Associate)	7/1/2013 – 9/30/2014	50				
CA	Everest West Los Angeles-Dental Assistant (Diploma)	7/1/2010 – 9/30/2014	30				
CA	Everest West Los Angeles-Massage Therapy (Diploma)	7/1/2011 – 9/30/2014	20				
CA	Everest West Los Angeles-Medical Administrative Assistant (Diploma)	7/1/2010 – 9/30/2014	30				
CA	Everest West Los Angeles-Medical Assistant (Diploma)	7/1/2010 – 9/30/2014	30				
CA	Everest West Los Angeles-Medical Insurance Billing and Coding (Diploma)	7/1/2010 – 9/30/2014	20				
CA	Everest West Los Angeles-Paralegal (Associate)	7/1/2013 – 9/30/2014	50				
CA	Everest West Los Angeles-Pharmacy Technician (Diploma)	7/1/2010 – 9/30/2014	20				
CA	WyoTech Fremont-Applied Automotive Technology - Advanced Diagnostics Concentration (Diploma)	7/1/2010 – 9/30/2013	10				
CA	WyoTech Fremont-Applied Automotive Technology (Diploma)	7/1/2010 – 9/30/2013	10				
CA	WyoTech Fremont-Automotive Technology/ Concentration in Automotive Diagnostics (Associate)	7/1/2010 – 9/30/2014	10				
CA	WyoTech Fremont-Automotive Technology/ Concentration in Service Management (Associate)	7/1/2010 – 9/30/2014	10				
CA	WyoTech Fremont-Commercial Heating Ventilation and Air Conditioning (CHVAC) (Diploma)	7/1/2011 – 9/30/2014	30				
CA	WyoTech Fremont-Electrician (Diploma)	7/1/2011 – 9/30/2012	20				
CA	WyoTech Fremont-Heating Ventilation and Air Conditioning (HVAC) (Diploma)	7/1/2011 – 9/30/2013	30				
CA	WyoTech Fremont-Motorcycle Technician (Diploma)	7/1/2011 – 9/30/2014	30				
CA	WyoTech Fremont-Plumbing Technology (Diploma)	7/1/2011 – 9/30/2012	30				
CA	WyoTech Fremont-Residential Heating Ventilation and Air Conditioning (HVAC) (Diploma)	7/1/2011 – 9/30/2014	30				
CA	WyoTech Long Beach-Automotive Technician (Diploma)	7/1/2010 – 9/30/2014	10				
CA	WyoTech Long Beach-Automotive Technology (Diploma)	7/1/2010 – 9/30/2014	10				
CA	WyoTech Long Beach-Electrician (Diploma)	7/1/2010 – 9/30/2014	20				
CA	WyoTech Long Beach-Heating Ventilation and Air Conditioning (HVAC) (Diploma)	7/1/2010 – 9/30/2013	30				
CA	WyoTech Long Beach-Industrial Electrical Technology (Diploma)	7/1/2010 – 9/30/2014	20				
CA	WyoTech Long Beach-Medical Assistant (Diploma)	7/1/2010 – 9/30/2014	30				
CA	WyoTech Long Beach-Plumbing Technology (Diploma)	7/1/2010 – 9/30/2014	30				
CA	WyoTech West Sacramento-Automotive Technology (all credential levels)	7/1/2010 – 9/30/2014	10	10	x	x	
CA	WyoTech West Sacramento-Automotive Technology and Management (Associate)	7/1/2010 – 9/30/2014	10				
CA	WyoTech West Sacramento-Automotive Technology with Advanced Automotive Diagnostics (all credential levels)	7/1/2010 – 9/30/2014	10	10	x	x	
CA	WyoTech West Sacramento-Collision/Refinishing and Upholstery Technology (Diploma)	7/1/2010 – 9/30/2014	10				
CA	WyoTech West Sacramento-Street Rod and Custom Fabrication with Automotive Technology (Diploma)	7/1/2010 – 9/30/2014	10				

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CO	Everest Aurora (CO)-Accounting (Associate)	7/1/2010 – 9/30/2014	50
CO	Everest Aurora (CO)-Business (Associate)	7/1/2010 – 9/30/2012; 7/1/2013 – 9/30/2014	50
CO	Everest Aurora (CO)-Criminal Justice (Associate)	7/1/2011 – 9/30/2012; 7/1/2013 – 9/30/2014	50
CO	Everest Aurora (CO)-Dental Assistant (Diploma)	7/1/2011 – 9/30/2012	30
CO	Everest Aurora (CO)-Medical Administrative Assistant (Diploma)	7/1/2011 – 9/30/2012	30
CO	Everest Aurora (CO)-Medical Assistant (Diploma)	7/1/2011 – 9/30/2012	30
CO	Everest Aurora (CO)-Medical Insurance Billing and Coding (Diploma)	7/1/2010 – 9/30/2012; 7/1/2013 – 9/30/2014	20
CO	Everest Aurora (CO)-Pharmacy Technician (Diploma)	7/1/2010 – 9/30/2012	20
CO	Everest Colorado Springs-Accounting (Associate)	7/1/2011 – 9/30/2014	50
CO	Everest Colorado Springs-Business (Associate)	7/1/2011 – 9/30/2014	50
CO	Everest Colorado Springs-Business Accounting (Diploma)	7/1/2011 – 9/30/2014	50
CO	Everest Colorado Springs-Computer Information Science (Associate)	7/1/2011 – 9/30/2014	100
CO	Everest Colorado Springs-Criminal Justice (Associate)	7/1/2011 – 9/30/2013	50
CO	Everest Colorado Springs-Dental Assistant (Diploma)	7/1/2011 – 9/30/2012	30
CO	Everest Colorado Springs-Legal Assistant/Paralegal (Associate)	7/1/2011 – 9/30/2014	50
CO	Everest Colorado Springs-Massage Therapy (Diploma)	7/1/2011 – 9/30/2014	20
CO	Everest Colorado Springs-Medical Administrative Assistant (Diploma)	7/1/2011 – 9/30/2013	30
CO	Everest Colorado Springs-Medical Assistant (Diploma)	7/1/2011 – 9/30/2013	30
CO	Everest Thornton-Accounting (Associate)	7/1/2010 – 9/30/2014	50
CO	Everest Thornton-Business (Associate)	7/1/2011 – 9/30/2014	50
CO	Everest Thornton-Business Accounting (Diploma)	7/1/2010 – 9/30/2014	50
CO	Everest Thornton-Criminal Justice (Associate)	7/1/2010 – 9/30/2014	50
CO	Everest Thornton-Medical Administrative Assistant (Diploma)	7/1/2010 – 9/30/2014	30
CO	Everest Thornton-Medical Assistant (Associate)	7/1/2010 – 9/30/2014	30
CO	Everest Thornton-Medical Assistant (Diploma)	7/1/2010 – 9/30/2014	30
CO	Everest Thornton-Medical Insurance Billing and Coding (Diploma)	7/1/2010 – 9/30/2013	20
CO	Everest Thornton-Paralegal (Associate)	7/1/2010 – 9/30/2011; 7/1/2012 – 9/30/2013	50
CO	Everest Thornton-Pharmacy Technician (Diploma)	7/1/2011 – 9/30/2013	20
CO	Everest Thornton-Surgical Technologist (Associate)	7/1/2010 – 9/30/2014	30
FL	Everest Brandon-Accounting (Associate)	7/1/2010 – 9/30/2012; 7/1/2013 – 9/30/2014	50
FL	Everest Brandon-Accounting (Bachelor)	7/1/2010 – 9/30/2014	50
FL	Everest Brandon-Applied Management (Associate)	7/1/2012 – 9/30/2014	50
FL	Everest Brandon-Business (Associate)	7/1/2010 – 9/30/2014	50
FL	Everest Brandon-Business (Bachelor)	7/1/2010 – 9/30/2012; 7/1/2013 – 9/30/2014	100
FL	Everest Brandon-Business Administration (Associate)	7/1/2010 – 9/30/2014	50
FL	Everest Brandon-Business Administration (Bachelor)	7/1/2010 – 9/30/2012; 7/1/2013 – 9/30/2014	100

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FL	Everest Brandon-Business Administration (Masters)	7/1/2010 – 9/30/2012; 7/1/2013 – 9/30/2014	100				
FL	Everest Brandon-Computer Information Science (Associate)	7/1/2010 – 9/30/2014	100				
FL	Everest Brandon-Computer Information Science (Bachelor)	7/1/2010 – 9/30/2014	100				
FL	Everest Brandon-Computer Office Technology and Applications (all credential levels)	7/1/2010 – 9/30/2014	20	20	x	x	
FL	Everest Brandon-Criminal Justice (Associate)	7/1/2010 – 9/30/2012; 7/1/2013 – 9/30/2014	50				
FL	Everest Brandon-Criminal Justice (Bachelor)	7/1/2010 – 9/30/2012; 7/1/2013 – 9/30/2014	50				
FL	Everest Brandon-Criminal Justice (Masters)	7/1/2010 – 9/30/2012	40				
FL	Everest Brandon-Massage Therapy (Diploma)	7/1/2010 – 9/30/2014	20				
FL	Everest Brandon-Medical Administrative Assistant (Diploma)	7/1/2010 – 9/30/2012; 7/1/2013 – 9/30/2014	30				
FL	Everest Brandon-Medical Assistant (Associate)	7/1/2010 – 9/30/2014	30				
FL	Everest Brandon-Medical Assistant (Diploma)	7/1/2010 – 9/30/2012; 7/1/2013 – 9/30/2014	30				
FL	Everest Brandon-Medical Insurance Billing and Coding (Associate)	7/1/2010 – 9/30/2012; 7/1/2013 – 9/30/2014	20				
FL	Everest Brandon-Medical Insurance Billing and Coding (Diploma)	7/1/2010 – 9/30/2014	20				
FL	Everest Brandon-Nursing (Associate)	7/1/2010 – 9/30/2012; 7/1/2013 – 9/30/2014	100				
FL	Everest Brandon-Paralegal (Associate)	7/1/2010 – 9/30/2012; 7/1/2013 – 9/30/2014	50				
FL	Everest Brandon-Paralegal (Bachelor)	7/1/2010 – 9/30/2012; 7/1/2013 – 9/30/2014	100				
FL	Everest Brandon-Pharmacy Technician (Associate)	7/1/2010 – 9/30/2014	10				
FL	Everest Brandon-Pharmacy Technician (Diploma)	7/1/2010 – 9/30/2014	20				
FL	Everest Brandon-Radiologic Technician (Associate)	7/1/2013 – 9/30/2014	x				
FL	Everest Brandon-Surgical Technologist (Associate)	7/1/2010 – 9/30/2014	30				
FL	Everest Fort Lauderdale-Medical Administrative Assistant (Diploma)	7/1/2010 – 9/30/2014	30				
FL	Everest Fort Lauderdale-Medical Assistant (Diploma)	7/1/2010 – 9/30/2014	30				
FL	Everest Fort Lauderdale-Medical Insurance Billing and Coding (Diploma)	7/1/2010 – 9/30/2014	20				
FL	Everest Fort Lauderdale-Patient Care Technician (Diploma)	7/1/2010 – 9/30/2014	20				
FL	Everest Fort Lauderdale-Pharmacy Technician (Diploma)	7/1/2010 – 9/30/2014	20				
FL	Everest Hialeah-Business (Associate)	7/1/2012 – 9/30/2014	50				
FL	Everest Hialeah-Criminal Investigations (Associate)	7/1/2010 – 9/30/2014	100				
FL	Everest Hialeah-Criminal Justice (Associate)	7/1/2010 – 9/30/2011; 7/1/2012 – 9/30/2014	50				
FL	Everest Hialeah-Criminal Justice Private and Homeland Security (Diploma)	7/1/2010 – 9/30/2011; 7/1/2012 – 9/30/2014	100				
FL	Everest Hialeah-Criminal Justice Social and Youth Services (Diploma)	7/1/2010 – 9/30/2011; 7/1/2012 – 9/30/2014	x				
FL	Everest Hialeah-Diagnostic Card Sonogram (Associate)	7/1/2010 – 9/30/2014	x				
FL	Everest Hialeah-Medical Administrative Assistant (Diploma)	7/1/2010 – 9/30/2014	30				
FL	Everest Hialeah-Medical Assistant (Diploma)	7/1/2010 – 9/30/2014	30				

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FL	Everest Hialeah-Medical Insurance Billing and Coding (Associate)	7/1/2010 – 9/30/2014	20
FL	Everest Hialeah-Medical Insurance Billing and Coding (Diploma)	7/1/2010 – 9/30/2014	20
FL	Everest Hialeah-Patient Care Technician (Diploma)	7/1/2012 – 9/30/2014	20
FL	Everest Hialeah-Pharmacy Technician (Diploma)	7/1/2011 – 9/30/2014	20
FL	Everest Hialeah-Surgical Technologist (Diploma)	7/1/2010 – 9/30/2011; 7/1/2012 – 9/30/2014	50
FL	Everest Jacksonville-Accounting (Associate)	7/1/2010 – 9/30/2011; 7/1/2012 – 9/30/2014	50
FL	Everest Jacksonville-Applied Management (Associate)	7/1/2011 – 9/30/2013	50
FL	Everest Jacksonville-Applied Management (Bachelor)	7/1/2010 – 9/30/2011; 7/1/2013 – 9/30/2014	100
FL	Everest Jacksonville-Business (Associate)	7/1/2010 – 9/30/2014	50
FL	Everest Jacksonville-Business (Bachelor)	7/1/2010 – 9/30/2011; 7/1/2013 – 9/30/2014	100
FL	Everest Jacksonville-Business Administration (Associate)	7/1/2010 – 9/30/2014	50
FL	Everest Jacksonville-Business Administration (Bachelor)	7/1/2010 – 9/30/2014	100
FL	Everest Jacksonville-Business Administration (Master)	7/1/2010 – 9/30/2014	100
FL	Everest Jacksonville-Criminal Justice (Associate)	7/1/2010 – 9/30/2011; 7/1/2012 – 9/30/2014	50
FL	Everest Jacksonville-Criminal Justice (Bachelor)	7/1/2010 – 9/30/2011; 7/1/2013 – 9/30/2014	50
FL	Everest Jacksonville-Criminal Justice (Master)	7/1/2010 – 9/30/2011; 7/1/2013 – 9/30/2014	40
FL	Everest Jacksonville-Criminal Justice Private and Homeland Security (Diploma)	7/1/2010 – 9/30/2011; 7/1/2012 – 9/30/2014	100
FL	Everest Jacksonville-Massage Therapy (Diploma)	7/1/2010 – 9/30/2011; 7/1/2012 – 9/30/2013	20
FL	Everest Jacksonville-Medical Administrative Assistant (Diploma)	7/1/2010 – 9/30/2011	30
FL	Everest Jacksonville-Medical Assistant (Diploma)	7/1/2010 – 9/30/2011	30
FL	Everest Jacksonville-Medical Assistant (Associate)	7/1/2010 – 9/30/2014	30
FL	Everest Jacksonville-Medical Insurance Billing and Coding (Diploma)	7/1/2013 – 9/30/2014	20
FL	Everest Jacksonville-Paralegal (Associate)	7/1/2010 – 9/30/2011	50
FL	Everest Jacksonville-Pharmacy Technician (Diploma)	7/1/2010 – 9/30/2011	20
FL	Everest Kendall (Miami)-Applied Management (Associate)	7/1/2012 – 9/30/2014	50
FL	Everest Kendall (Miami)-Business (Associate)	7/1/2012 – 9/30/2014	50
FL	Everest Kendall (Miami)-Business Sales and Customer Design (Diploma)	7/1/2012 – 9/30/2014	x
FL	Everest Kendall (Miami)-Criminal Investigations (Associate)	7/1/2012 – 9/30/2014	100
FL	Everest Kendall (Miami)-Criminal Justice (Associate)	7/1/2012 – 9/30/2014	50
FL	Everest Kendall (Miami)-Criminal Justice Private and Homeland Security (Diploma)	7/1/2012 – 9/30/2014	100
FL	Everest Kendall (Miami)-Medical Insurance Billing and Coding (Associate)	7/1/2010 – 9/30/2014	20
FL	Everest Kendall (Miami)-Medical Insurance Billing and Coding (Diploma)	7/1/2010 – 9/30/2011; 7/1/2013 – 9/30/2014	20
FL	Everest Kendall (Miami)-Patient Care Technician (Diploma)	7/1/2013 – 9/30/2014	20

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FL	Everest Lakeland-Accounting (Associate)	7/1/2011 – 9/30/2012	50
FL	Everest Lakeland-Applied Management (Associate)	7/1/2013 – 9/30/2014	50
FL	Everest Lakeland-Applied Management (Bachelor)	7/1/2011 – 9/30/2012; 7/1/2013 – 9/30/2014	100
FL	Everest Lakeland-Business (Associate)	7/1/2010 – 9/30/2014	50
FL	Everest Lakeland-Business (Bachelor)	7/1/2011 – 9/30/2014	100
FL	Everest Lakeland-Business Administration (Associate)	7/1/2010 – 9/30/2014	50
FL	Everest Lakeland-Criminal Justice (Associate)	7/1/2011 – 9/30/2014	50
FL	Everest Lakeland-Criminal Justice (Bachelor)	7/1/2013 – 9/30/2014	50
FL	Everest Lakeland-Massage Therapy (Diploma)	7/1/2012 – 9/30/2013	20
FL	Everest Lakeland-Medical Administrative Assistant (Diploma)	7/1/2010 – 9/30/2011; 7/1/2012 – 9/30/2014	30
FL	Everest Lakeland-Medical Assistant (Associate)	7/1/2010 – 9/30/2011; 7/1/2012 – 9/30/2013	30
FL	Everest Lakeland-Medical Assistant (Diploma)	7/1/2010 – 9/30/2011; 7/1/2012 – 9/30/2013	30
FL	Everest Lakeland-Paralegal (Associate)	7/1/2013 – 9/30/2014	50
FL	Everest Lakeland-Pharmacy Technician (Diploma)	7/1/2012 – 9/30/2014	20
FL	Everest Largo-Accounting (Associate)	7/1/2010 – 9/30/2014	50
FL	Everest Largo-Accounting (Bachelor)	7/1/2011 – 9/30/2014	50
FL	Everest Largo-Business (Associate)	7/1/2011 – 9/30/2014	50
FL	Everest Largo-Business (Bachelor)	7/1/2010 – 9/30/2011; 7/1/2012 – 9/30/2014	100
FL	Everest Largo-Business Administration (Associate)	7/1/2011 – 9/30/2014	50
FL	Everest Largo-Business Administration (Bachelor)	7/1/2010 – 9/30/2014	100
FL	Everest Largo-Business Administration (Master)	7/1/2010 – 9/30/2011	100
FL	Everest Largo-Business Office Administration (Diploma)	7/1/2011 – 9/30/2014	20
FL	Everest Largo-Business Sales and Customer Service (Diploma)	7/1/2011 – 9/30/2014	x
FL	Everest Largo-Computer Information Science (Associate)	7/1/2010 – 9/30/2014	100
FL	Everest Largo-Computer Information Science (Bachelor)	7/1/2012 – 9/30/2014	100
FL	Everest Largo-Criminal Justice (Associate)	7/1/2010 – 9/30/2011; 7/1/2012 – 9/30/2014	50
FL	Everest Largo-Dental Assistant (Diploma)	7/1/2011 – 9/30/2014	30
FL	Everest Largo-Massage Therapy (Diploma)	7/1/2012 – 9/30/2014	20
FL	Everest Largo-Medical Administrative Assistant (Diploma)	7/1/2011 – 9/30/2014	30
FL	Everest Largo-Medical Assistant (Associate)	7/1/2011 – 9/30/2014	30
FL	Everest Largo-Medical Assistant (Diploma)	7/1/2011 – 9/30/2014	30
FL	Everest Largo-Medical Insurance Billing and Coding (Associate)	7/1/2012 – 9/30/2014	20
FL	Everest Largo-Medical Insurance Billing and Coding (Diploma)	7/1/2012 – 9/30/2014	20
FL	Everest Largo-Paralegal (Associate)	7/1/2010 – 9/30/2014	50
FL	Everest Largo-Paralegal (Bachelor)	7/1/2011 – 9/30/2014	100
FL	Everest Largo-Pharmacy Technician (Diploma)	7/1/2011 – 9/30/2014	20
FL	Everest Melbourne-Accounting (Bachelor)	7/1/2011 – 9/30/2014	50
FL	Everest Melbourne-Business (Associate)	7/1/2012 – 9/30/2013	50
FL	Everest Melbourne-Business (Bachelor)	7/1/2010 – 9/30/2011; 7/1/2012 – 9/30/2014	100
FL	Everest Melbourne-Business Administration (Associate)	7/1/2012 – 9/30/2013	50
FL	Everest Melbourne-Business Administration (Bachelor)	7/1/2010 – 9/30/2014	100

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FL	Everest Melbourne-Business Administration (Master)	7/1/2011 – 9/30/2014	100				
FL	Everest Melbourne-Business Office Administration (Diploma)	7/1/2012 – 9/30/2013	20				
FL	Everest Melbourne-Computer Information Science (Associate)	7/1/2010– 9/30/2011	100				
FL	Everest Melbourne-Criminal Justice (Associate)	7/1/2010 – 9/30/2011; 7/1/2012 – 9/30/2014	50				
FL	Everest Melbourne-Criminal Justice (Bachelor)	7/1/2010 – 9/30/2011; 7/1/2012 – 9/30/2014	50				
FL	Everest Melbourne-Film and Video (Associate)	7/1/2010 – 9/30/2014	100				
FL	Everest Melbourne-Health Care Administration (Bachelor)	7/1/2012 – 9/30/2013	40				
FL	Everest Melbourne-Paralegal (Associate)	7/1/2010 – 9/30/2011; 7/1/2012 – 9/30/2014	50				
FL	Everest Melbourne-Paralegal (Bachelor)	7/1/2013 – 9/30/2014	100				
FL	Everest Melbourne-Pharmacy Technician (Associates)	7/1/2013 – 9/30/2014	10				
FL	Everest Melbourne-Pharmacy Technician (Diploma)	7/1/2013 – 9/30/2014	20				
FL	Everest Miami-Applied Management (Associate)	7/1/2013 – 9/30/2014	50				
FL	Everest Miami-Business (Associate)	7/1/2011 – 9/30/2013	50				
FL	Everest Miami-Business Office Administration (Diploma)	7/1/2011 – 9/30/2013	20				
FL	Everest Miami-Criminal Investigations (Associate)	7/1/2010 – 9/30/2014	100				
FL	Everest Miami-Criminal Justice (Associate)	7/1/2010 – 9/30/2014	50				
FL	Everest Miami-Criminal Justice Private and Homeland Security (Diploma)	7/1/2010 – 9/30/2014	100				
FL	Everest Miami-Heating, Ventilation and Air Conditioning (Diploma)	7/1/2013 – 9/30/2014	30				
FL	Everest Miami-Medical Administrative Assistant (Diploma)	7/1/2010 – 9/30/2011; 7/1/2012 – 9/30/2014	30				
FL	Everest Miami-Medical Assistant (Diploma)	7/1/2010 – 9/30/2011; 7/1/2012 – 9/30/2014	30				
FL	Everest Miami-Medical Insurance Billing and Coding (Associates)	7/1/2010 – 9/30/2011; 7/1/2012 – 9/30/2014	20				
FL	Everest Miami-Medical Insurance Billing and Coding (Diploma)	7/1/2010 – 9/30/2011; 7/1/2012 – 9/30/2014	20				
FL	Everest Miami-Patient Care Technician (Diploma)	7/1/2010 – 9/30/2014	20				
FL	Everest Miami-Pharmacy Technician (Diploma)	7/1/2010 – 9/30/2013	20				
FL	Everest Orange Park-Applied Management (Associate)	7/1/2010 – 9/30/2011; 7/1/2012 – 9/30/2013	50				
FL	Everest Orange Park-Applied Management (Bachelor)	7/1/2010 – 9/30/2012; 7/1/2013 – 9/30/2014	100				
FL	Everest Orange Park-Business (Associate)	7/1/2010 – 9/30/2014	50				
FL	Everest Orange Park-Business (Bachelor)	7/1/2011 – 9/30/2014	100				
FL	Everest Orange Park-Business Office Administration	7/1/2010 – 9/30/2014	20	20	x	x	
FL	Everest Orange Park-Criminal Investigations (Associate)	7/1/2010 – 9/30/2014	100				
FL	Everest Orange Park-Criminal Justice (Associate)	7/1/2010 – 9/30/2014	50				
FL	Everest Orange Park-Criminal Justice (Bachelor)	7/1/2010 – 9/30/2012; 7/1/2013 – 9/30/2014	50				
FL	Everest Orange Park-Electrician (Diploma)	7/1/2010 – 9/30/2013	20				
FL	Everest Orange Park-Heating, Ventilation and Air Conditioning (Diploma)	7/1/2010 – 9/30/2013	30				
FL	Everest Orange Park-Medical Administrative Assistant (Diploma)	7/1/2010 – 9/30/2013	30				

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FL	Everest Orange Park-Medical Assistant (Associate)	7/1/2010 – 9/30/2014	30
FL	Everest Orange Park-Medical Assistant (Diploma)	7/1/2010 – 9/30/2013	30
FL	Everest Orange Park-Medical Insurance Billing and Coding (Associate)	7/1/2011 – 9/30/2014	20
FL	Everest Orange Park-Medical Insurance Billing and Coding (Diploma)	7/1/2011 – 9/30/2014	20
FL	Everest Orange Park-Pharmacy Technician (Diploma)	7/1/2012 – 9/30/2014	20
FL	Everest Orlando North – Business (Bachelor)	7/1/2010 – 9/30/2011; 7/1/2013 – 9/30/2014	100
FL	Everest Orlando North-Accounting (Associate)	7/1/2011 – 9/30/2012; 7/1/2013 – 9/30/2014	50
FL	Everest Orlando North-Accounting (Bachelor)	7/1/2012 – 9/30/2013	50
FL	Everest Orlando North-Business (Associate)	7/1/2011 – 9/30/2014	50
FL	Everest Orlando North-Business Accounting (Diploma)	7/1/2011 – 9/30/2012; 7/1/2013 – 9/30/2014	50
FL	Everest Orlando North-Business Administration (Associate)	7/1/2011 – 9/30/2014	50
FL	Everest Orlando North-Business Administration (Bachelor)	7/1/2010 – 9/30/2014	100
FL	Everest Orlando North-Business Administration (Master)	7/1/2010 – 9/30/2011; 7/1/2012 – 9/30/2014	100
FL	Everest Orlando North-Business Sales and Customer Service (Diploma)	7/1/2011 – 9/30/2014	x
FL	Everest Orlando North-Computer Information Science (Associate)	7/1/2010 – 9/30/2011; 7/1/2013 – 9/30/2014	100
FL	Everest Orlando North-Computer Information Science (Bachelor)	7/1/2011 – 9/30/2013	100
FL	Everest Orlando North-Criminal Justice (Associate)	7/1/2010 – 9/30/2011; 7/1/2012 – 9/30/2014	50
FL	Everest Orlando North-Criminal Justice (Bachelor)	7/1/2011 – 9/30/2012; 7/1/2013 – 9/30/2014	50
FL	Everest Orlando North-Film and Video (Associate)	7/1/2010 – 9/30/2012; 7/1/2013 – 9/30/2014	100
FL	Everest Orlando North-Health Care Administration (Bachelor)	7/1/2010 – 9/30/2011; 7/1/2013 – 9/30/2014	40
FL	Everest Orlando North-Massage Therapy (Diploma)	7/1/2010 – 9/30/2011	20
FL	Everest Orlando North-Medical Administrative Assistant (Diploma)	7/1/2010 – 9/30/2013	30
FL	Everest Orlando North-Medical Assistant (Associate)	7/1/2010 – 9/30/2013	30
FL	Everest Orlando North-Medical Assistant (Diploma)	7/1/2010 – 9/30/2013	30
FL	Everest Orlando North-Medical Insurance Billing and Coding (Associate)	7/1/2010 – 9/30/2011	20
FL	Everest Orlando North-Medical Insurance Billing and Coding (Diploma)	7/1/2010 – 9/30/2011	20
FL	Everest Orlando North-Paralegal (Bachelor)	7/1/2011 – 9/30/2012; 7/1/2013 – 9/30/2014	100
FL	Everest Orlando North-Pharmacy Technician (Associate)	7/1/2012 – 9/30/2013	10
FL	Everest Orlando North-Pharmacy Technician (Diploma)	7/1/2012 – 9/30/2013	20
FL	Everest Orlando South-Accounting (Associate)	7/1/2010 – 9/30/2012; 7/1/2013 – 9/30/2014	50

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FL	Everest Orlando South-Accounting (Bachelor)	7/1/2010 – 9/30/2011; 7/1/2012 – 9/30/2014	50
FL	Everest Orlando South-Applied Management (Associate)	7/1/2012 – 9/30/2014	50
FL	Everest Orlando South-Applied Management (Bachelor)	7/1/2010 – 9/30/2011; 7/1/2012 – 9/30/2014	100
FL	Everest Orlando South-Business (Associate)	7/1/2010 – 9/30/2014	50
FL	Everest Orlando South-Business (Bachelor)	7/1/2010 – 9/30/2014	100
FL	Everest Orlando South-Business Administration (Associate)	7/1/2010 – 9/30/2014	50
FL	Everest Orlando South-Business Administration (Bachelor)	7/1/2010 – 9/30/2014	100
FL	Everest Orlando South-Business Administration (Masters)	7/1/2010 – 9/30/2012	100
FL	Everest Orlando South-Business Sales and Customer Service (Diploma)	7/1/2010 – 9/30/2014	x
FL	Everest Orlando South-Computer Information Science (Associate)	7/1/2010 – 9/30/2011; 7/1/2013 – 9/30/2014	100
FL	Everest Orlando South-Computer Information Science (Bachelor)	7/1/2011 – 9/30/2012	100
FL	Everest Orlando South-Criminal Investigations (Associate)	7/1/2010 – 9/30/2014	100
FL	Everest Orlando South-Criminal Justice (Associate)	7/1/2010 – 9/30/2014	50
FL	Everest Orlando South-Criminal Justice (Bachelor)	7/1/2010 – 9/30/2011; 7/1/2012 – 9/30/2014	50
FL	Everest Orlando South-Criminal Justice Private and Homeland Security (Diploma)	7/1/2010 – 9/30/2014	100
FL	Everest Orlando South-Healthcare Administration (Bachelor)	7/1/2012 – 9/30/2014	40
FL	Everest Orlando South-Homeland Security (Bachelor)	7/1/2011 – 9/30/2014	100
FL	Everest Orlando South-Massage Therapy (Diploma)	7/1/2010 – 9/30/2013	20
FL	Everest Orlando South-Medical Administrative Assistant (Diploma)	7/1/2010 – 9/30/2012; 7/1/2013 – 9/30/2014	30
FL	Everest Orlando South-Medical Assistant (Associate)	7/1/2010 – 9/30/2014	30
FL	Everest Orlando South-Medical Assistant (Diploma)	7/1/2010 – 9/30/2012; 7/1/2013 – 9/30/2014	30
FL	Everest Orlando South-Paralegal (Associate)	7/1/2010 – 9/30/2011	50
FL	Everest Orlando South-Paralegal (Bachelor)	7/1/2011 – 9/30/2014	100
FL	Everest Orlando South-Pharmacy Technician (Associate)	7/1/2010 – 9/30/2014	10
FL	Everest Orlando South-Pharmacy Technician (Diploma)	7/1/2010 – 9/30/2012; 7/1/2013 – 9/30/2014	20
FL	Everest Pompano Beach-Accounting (Associate)	7/1/2010 – 9/30/2012; 7/1/2013 – 9/30/2014	50
FL	Everest Pompano Beach-Accounting (Bachelor)	7/1/2010 – 9/30/2011	50
FL	Everest Pompano Beach-Applied Management (Associate)	7/1/2011 – 9/30/2012; 7/1/2013 – 9/30/2014	50
FL	Everest Pompano Beach-Applied Management (Bachelor)	7/1/2011 – 9/30/2012; 7/1/2013 – 9/30/2014	100
FL	Everest Pompano Beach-Business (Associate)	7/1/2010 – 9/30/2014	50
FL	Everest Pompano Beach-Business (Bachelor)	7/1/2011 – 9/30/2014	100
FL	Everest Pompano Beach-Business Administration (Associate)	7/1/2010 – 9/30/2014	50
FL	Everest Pompano Beach-Business Administration (Bachelor)	7/1/2011 – 9/30/2014	100
FL	Everest Pompano Beach-Business Administration (Masters)	7/1/2010 – 9/30/2014	100
FL	Everest Pompano Beach-Computer Information Science (Associate)	7/1/2011 – 9/30/2014	100

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FL	Everest Pompano Beach-Computer Information Science (Bachelor)	7/1/2010 – 9/30/2014	100
FL	Everest Pompano Beach-Criminal Investigations (Associate)	7/1/2010 – 9/30/2012; 7/1/2013 – 9/30/2014	100
FL	Everest Pompano Beach-Criminal Justice (Associate)	7/1/2010 – 9/30/2012; 7/1/2013 – 9/30/2014	50
FL	Everest Pompano Beach-Criminal Justice (Bachelor)	7/1/2010 – 9/30/2014	50
FL	Everest Pompano Beach-Criminal Justice (Master)	7/1/2011 – 9/30/2014	40
FL	Everest Pompano Beach-Criminal Justice Private and Homeland Security (Diploma)	7/1/2010 – 9/30/2012; 7/1/2013 – 9/30/2014	100
FL	Everest Pompano Beach-Homeland Security (Associate)	7/1/2010 – 9/30/2011	100
FL	Everest Pompano Beach-Hospitality Management (Associate)	7/1/2010 – 9/30/2012	20
FL	Everest Pompano Beach-Hospitality Management (Bachelor)	7/1/2010 – 9/30/2011; 7/1/2012 – 9/30/2014	x
FL	Everest Pompano Beach-Massage Therapy (Diploma)	7/1/2010 – 9/30/2011; 7/1/2013 – 9/30/2014	20
FL	Everest Pompano Beach-Medical Assistant (Associate)	7/1/2010 – 9/30/2014	30
FL	Everest Pompano Beach-Medical Assistant (Diploma)	7/1/2010 – 9/30/2012	30
FL	Everest Pompano Beach-Medical Insurance Billing and Coding (Associate)	7/1/2010 – 9/30/2014	20
FL	Everest Pompano Beach-Medical Insurance Billing and Coding (Diploma)	7/1/2010 – 9/30/2012	20
FL	Everest Pompano Beach-Paralegal (Associate)	7/1/2010 – 9/30/2013	50
FL	Everest Pompano Beach-Patient Care Technician (Diploma)	7/1/2010 – 9/30/2013	20
FL	Everest Pompano Beach-Pharmacy Technician (Diploma)	7/1/2011 – 9/30/2013	20
FL	Everest Tampa-Accounting (Associate)	7/1/2010 – 9/30/2012; 7/1/2013 – 9/30/2014	50
FL	Everest Tampa-Accounting (Bachelor)	7/1/2011 – 9/30/2014	50
FL	Everest Tampa-Applied Management (Associate)	7/1/2010 – 9/30/2011; 7/1/2013 – 9/30/2014	50
FL	Everest Tampa-Applied Management (Bachelor)	7/1/2010 – 9/30/2012; 7/1/2013 – 9/30/2014	100
FL	Everest Tampa-Business (Associate)	7/1/2010 – 9/30/2014	50
FL	Everest Tampa-Business (Bachelor)	7/1/2010 – 9/30/2014	100
FL	Everest Tampa-Business Administration (Master)	7/1/2010 – 9/30/2014	100
FL	Everest Tampa-Computer Information Science (Associate)	7/1/2010 – 9/30/2011; 7/1/2012 – 9/30/2014	100
FL	Everest Tampa-Computer Information Science (Bachelor)	7/1/2011 – 9/30/2013	100
FL	Everest Tampa-Criminal Investigations (Associate)	7/1/2010 – 9/30/2014	100
FL	Everest Tampa-Criminal Justice (Associate)	7/1/2010 – 9/30/2011; 7/1/2012 – 9/30/2014	50
FL	Everest Tampa-Criminal Justice (Bachelor)	7/1/2012 – 9/30/2014	50
FL	Everest Tampa-Criminal Justice Private and Homeland Security (Diploma)	7/1/2010 – 9/30/2011; 7/1/2012 – 9/30/2014	100
FL	Everest Tampa-Electrician (Diploma)	7/1/2012 – 9/30/2014	20
FL	Everest Tampa-Heating, Ventilation and Air Conditioning (Diploma)	7/1/2013 – 9/30/2014	30
FL	Everest Tampa-Massage Therapy (Diploma)	7/1/2010 – 9/30/2011; 7/1/2013 – 9/30/2014	20

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FL	Everest Tampa-Medical Administrative Assistant (Diploma)	7/1/2010 – 9/30/2011; 7/1/2013 – 9/30/2014	30				
FL	Everest Tampa-Medical Assistant (Associate)	7/1/2010 – 9/30/2011; 7/1/2013 – 9/30/2014	30				
FL	Everest Tampa-Medical Assistant (Diploma)	7/1/2010 – 9/30/2011; 7/1/2013 – 9/30/2014	30				
FL	Everest Tampa-Medical Insurance Billing and Coding (Associates)	7/1/2012 – 9/30/2013	20				
FL	Everest Tampa-Medical Insurance Billing and Coding (Diploma)	7/1/2012 – 9/30/2013	20				
FL	Everest Tampa-Paralegal (Associate)	7/1/2010 – 9/30/2011; 7/1/2013 – 9/30/2014	50				
FL	Everest Tampa-Paralegal (Bachelor)	7/1/2013 – 9/30/2014	100				
FL	Everest Tampa-Pharmacy Technician (Associate)	7/1/2010 – 9/30/2011	10				
FL	Everest Tampa-Pharmacy Technician (Diploma)	7/1/2010 – 9/30/2011	20				
GA	Everest Atlanta (Greenbriar)-Dental Assistant (Diploma)	7/1/2013 – 9/30/2014	30				
GA	Everest Atlanta (Greenbriar)-Medical Administrative Assistant (Diploma)	7/1/2013 – 9/30/2014	30				
GA	Everest Atlanta (Greenbriar)-Medical Assistant (Diploma)	7/1/2013 – 9/30/2014	30				
GA	Everest Atlanta (Greenbriar)-Medical Insurance Billing and Coding (Diploma)	7/1/2013 – 9/30/2014	20				
GA	Everest Atlanta (Greenbriar)-Pharmacy Technician (Diploma)	7/1/2013 – 9/30/2014	20				
GA	Everest Decatur-Medical Administrative Assistant (Diploma)	7/1/2010 – 9/30/2014	30				
GA	Everest Decatur-Medical Assistant (Diploma)	7/1/2010 – 9/30/2014	30				
GA	Everest Decatur-Medical Insurance Billing and Coding (Diploma)	7/1/2010 – 9/30/2014	20				
GA	Everest Decatur-Respiratory Care	7/1/2010 – 9/30/2014	x	30	x	x	
GA	Everest Jonesboro-Massage Therapy (Diploma)	7/1/2010 – 9/30/2011	20				
GA	Everest Jonesboro-Medical Administrative Assistant (Diploma)	7/1/2010 – 9/30/2011	30				
GA	Everest Jonesboro-Medical Assistant (Diploma)	7/1/2010 – 9/30/2011	30				
GA	Everest Jonesboro-Medical Insurance Billing and Coding (Diploma)	7/1/2012 – 9/30/2013	20				
GA	Everest Jonesboro-Patient Care Technician (Diploma)	7/1/2010 – 9/30/2011; 7/1/2013 – 9/30/2014	20				
GA	Everest Jonesboro-Pharmacy Technician (Diploma)	7/1/2010 – 9/30/2011	20				
GA	Everest Marietta-Massage Therapy (all credential levels)	7/1/2010 – 9/30/2014	20	x	x	x	
GA	Everest Marietta-Medical Administrative Assistant (Diploma)	7/1/2010 – 9/30/2011	30				
GA	Everest Marietta-Medical Assistant (Diploma)	7/1/2010 – 9/30/2011	30				
GA	Everest Marietta-Medical Insurance Billing and Coding (Diploma)	7/1/2012 – 9/30/2014	20				
GA	Everest Marietta-Surgical Technologist (Diploma)	7/1/2010 – 9/30/2011; 7/1/2012 – 9/30/2013	50				
GA	Everest Norcross-Dental Assistant (Diploma)	7/1/2010 – 9/30/2011	30				
GA	Everest Norcross-Massage Therapy (Diploma)	7/1/2011 – 9/30/2012	20				
GA	Everest Norcross-Medical Administrative Assistant (Diploma)	7/1/2010 – 9/30/2011; 7/1/2013 – 9/30/2014	30				

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GA	Everest Norcross-Medical Assistant (Diploma)	7/1/2010 – 9/30/2011; 7/1/2013 – 9/30/2014	30				
GA	Everest Norcross-Medical Insurance Billing and Coding (Diploma)	7/1/2010 – 9/30/2011; 7/1/2012 – 9/30/2013	20				
IL	Everest Burr Ridge-Dental Assistant (Diploma)	7/1/2013 – 9/30/2014	30				
IL	Everest Burr Ridge-Medical Administrative Assistant (Diploma)	7/1/2013 – 9/30/2014	30				
IL	Everest Burr Ridge-Medical Assistant (Diploma)	7/1/2013 – 9/30/2014	30				
IL	Everest Burr Ridge-Medical Insurance Billing and Coding (Diploma)	7/1/2012 – 9/30/2013	20				
IL	Everest Chicago-Dental Assistant (Diploma)	7/1/2011 – 9/30/2014	30				
IL	Everest Chicago-Medical Administrative Assistant (Diploma)	7/1/2010 – 9/30/2011	30				
IL	Everest Chicago-Medical Assistant (Diploma)	7/1/2010 – 9/30/2011	30				
IL	Everest Chicago-Medical Insurance Billing and Coding (Diploma)	7/1/2011 – 9/30/2014	20				
IL	Everest Melrose Park-Dental Assistant (Diploma)	7/1/2013 – 9/30/2014	30				
IL	Everest Melrose Park-Medical Administrative Assistant (Diploma)	7/1/2013 – 9/30/2014	30				
IL	Everest Melrose Park-Medical Assistant (Diploma)	7/1/2013 – 9/30/2014	30				
IL	Everest Melrose Park-Medical Insurance Billing and Coding (Diploma)	7/1/2013 – 9/30/2014	20				
IL	Everest Melrose Park-Pharmacy Technician (Associate)	7/1/2013 – 9/30/2014	10				
IL	Everest Merrionette Park-Dental Assistant (Diploma)	7/1/2013 – 9/30/2014	30				
IL	Everest Merrionette Park-Massage Therapy (Diploma)	7/1/2013 – 9/30/2014	20				
IL	Everest Merrionette Park-Medical Administrative Assistant (Diploma)	7/1/2010 – 9/30/2011; 7/1/2013 – 9/30/2014	30				
IL	Everest Merrionette Park-Medical Assistant (Diploma)	7/1/2010 – 9/30/2011; 7/1/2013 – 9/30/2014	30				
IL	Everest Merrionette Park-Medical Insurance Billing and Coding (Diploma)	7/1/2013 – 9/30/2014	20				
IL	Everest Merrionette Park-Pharmacy Technician (Diploma)	7/1/2010 – 9/30/2011; 7/1/2013 – 9/30/2014	20				
IL	Everest North Aurora (IL)-Electrician (Diploma)	7/1/2012 – 9/30/2014	20				
IL	Everest North Aurora (IL)-Medical Administrative Assistant (Diploma)	7/1/2010 – 9/30/2014	30				
IL	Everest North Aurora (IL)-Medical Assistant (all credential levels)	7/1/2010 – 9/30/2014	30	30	x	x	
IL	Everest North Aurora (IL)-Medical Insurance Billing and Coding (Diploma)	7/1/2011 – 9/30/2014	20				
IL	Everest Skokie-Dental Assistant (Diploma)	7/1/2012 – 9/30/2013	30				
IL	Everest Skokie-Medical Administrative Assistant (Diploma)	7/1/2013 – 9/30/2014	30				
IL	Everest Skokie-Medical Assistant (Diploma)	7/1/2013 – 9/30/2014	30				
IL	Everest Skokie-Medical Insurance Billing and Coding (Diploma)	7/1/2010 – 9/30/2012	20				
IL	Everest Skokie-Pharmacy Technician (Associate)	7/1/2010 – 9/30/2012; 7/1/2013 – 9/30/2014	10				
IL	Everest Skokie-Pharmacy Technician (Diploma)	7/1/2010 – 9/30/2012; 7/1/2013 – 9/30/2014	20				

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IN	Everest Merrillville-Business Accounting (all credential levels)	7/1/2010 – 9/30/2014	50	50	50	x
IN	Everest Merrillville-Dental Assistant (Diploma)	7/1/2010 – 9/30/2011	30			
IN	Everest Merrillville-Massage Therapy (Diploma)	7/1/2012 – 9/30/2014	20			
IN	Everest Merrillville-Medical Administrative Assistant (Diploma)	7/1/2010 – 9/30/2011; 7/1/2012 – 9/30/2013	30			
IN	Everest Merrillville-Medical Assistant (Diploma)	7/1/2010 – 9/30/2011; 7/1/2012 – 9/30/2013	30			
IN	Everest Merrillville-Practical Nursing (Diploma)	7/1/2013 – 9/30/2014	20			
MA	Everest Brighton-Dental Assistant (Diploma)	7/1/2010 – 9/30/2011	30			
MA	Everest Brighton-Massage Therapy (all credential levels)	7/1/2010 – 9/30/2014	20	x	x	x
MA	Everest Brighton-Medical Administrative Assistant (Diploma)	7/1/2010 – 9/30/2014	30			
MA	Everest Brighton-Medical Assistant (Diploma)	7/1/2010 – 9/30/2014	30			
MA	Everest Chelsea-Dental Assistant (Diploma)	7/1/2012 – 9/30/2013	30			
MA	Everest Chelsea-Massage Therapy (Diploma)	7/1/2011 – 9/30/2014	20			
MA	Everest Chelsea-Medical Administrative Assistant (Diploma)	7/1/2011 – 9/30/2014	30			
MA	Everest Chelsea-Medical Assistant (Diploma)	7/1/2011 – 9/30/2014	30			
MA	Everest Chelsea-Medical Insurance Billing and Coding (Diploma)	7/1/2011 – 9/30/2014	20			
MI	Everest Dearborn-Dental Assistant (Diploma)	7/1/2010 – 9/30/2013	30			
MI	Everest Dearborn-Massage Therapy (Associates)	7/1/2013 – 9/30/2014	x			
MI	Everest Dearborn-Massage Therapy (Diploma)	7/1/2013 – 9/30/2014	20			
MI	Everest Dearborn-Medical Administrative Assistant (Diploma)	7/1/2010 – 9/30/2013	30			
MI	Everest Dearborn-Medical Assistant (Diploma)	7/1/2010 – 9/30/2013	30			
MI	Everest Dearborn-Medical Insurance Billing and Coding (Diploma)	7/1/2012 – 9/30/2014	20			
MI	Everest Dearborn-Patient Care Technician (Diploma)	7/1/2013 – 9/30/2014	20			
MI	Everest Dearborn-Pharmacy Technician (all credential levels)	7/1/2010 – 9/30/2014	20	10	x	x
MI	Everest Detroit-Massage Therapy (Diploma)	7/1/2011 – 9/30/2014	20			
MI	Everest Detroit-Medical Administrative Assistant (Diploma)	7/1/2011 – 9/30/2014	30			
MI	Everest Detroit-Medical Assistant (Diploma)	7/1/2011 – 9/30/2014	30			
MI	Everest Detroit-Pharmacy Technician (Diploma)	7/1/2011 – 9/30/2014	20			
MI	Everest Grand Rapids-Dental Assistant (Diploma)	7/1/2011 – 9/30/2014	30			
MI	Everest Grand Rapids-Massage Therapy (Diploma)	7/1/2010 – 9/30/2011; 7/1/2012 – 9/30/2014	20			
MI	Everest Grand Rapids-Medical Administrative Assistant (Diploma)	7/1/2010 – 9/30/2014	30			
MI	Everest Grand Rapids-Medical Assistant (Diploma)	7/1/2010 – 9/30/2014	30			
MI	Everest Grand Rapids-Medical Insurance Billing and Coding (Diploma)	7/1/2010 – 9/30/2014	20			
MI	Everest Grand Rapids-Practical Nursing (Diploma)	7/1/2010 – 9/30/2011; 7/1/2013 – 9/30/2014	20			
MI	Everest Kalamazoo-Business Accounting (Diploma)	7/1/2011 – 9/30/2014	50			
MI	Everest Kalamazoo-Dental Assistant (Diploma)	7/1/2010 – 9/30/2011; 7/1/2013 – 9/30/2014	30			

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MI	Everest Kalamazoo-Massage Therapy (Diploma)	7/1/2013 – 9/30/2014	20
MI	Everest Kalamazoo-Medical Administrative Assistant (Diploma)	7/1/2010 – 9/30/2012; 7/1/2013 – 9/30/2014	30
MI	Everest Kalamazoo-Medical Assistant (Associate)	7/1/2010 – 9/30/2012; 7/1/2013 – 9/30/2014	30
MI	Everest Kalamazoo-Medical Assistant (Diploma)	7/1/2010 – 9/30/2012; 7/1/2013 – 9/30/2014	30
MI	Everest Kalamazoo-Pharmacy Technician (Associate)	7/1/2010 – 9/30/2014	10
MI	Everest Southfield-Computer Technology (Diploma)	7/1/2010 – 9/30/2014	100
MI	Everest Southfield-Electronics Computer Technology (Diploma)	7/1/2010 – 9/30/2014	30
MI	Everest Southfield-Massage Therapy (Diploma)	7/1/2013 – 9/30/2014	20
MI	Everest Southfield-Medical Administrative Assistant (Diploma)	7/1/2010 – 9/30/2014	30
MI	Everest Southfield-Medical Assistant (Diploma)	7/1/2010 – 9/30/2014	30
MI	Everest Southfield-Medical Insurance Billing and Coding (Diploma)	7/1/2010 – 9/30/2014	20
MN	Everest Eagan-Massage Therapy (Diploma)	7/1/2010 – 9/30/2011; 7/1/2012 – 9/30/2014	20
MN	Everest Eagan-Medical Administrative Assistant (Diploma)	7/1/2010 – 9/30/2014	30
MN	Everest Eagan-Medical Assistant (Diploma)	7/1/2010 – 9/30/2014	30
MN	Everest Eagan-Medical Insurance Billing and Coding (Diploma)	7/1/2010 – 9/30/2013	20
MN	Everest Eagan-Pharmacy Technician (Diploma)	7/1/2010 – 9/30/2014	20
MO	Everest Springfield-Accounting (AAS)	7/1/2010 – 9/30/2013	50
MO	Everest Springfield-Accounting (Associate)	7/1/2010 – 9/30/2013	50
MO	Everest Springfield-Accounting (Bachelor)	7/1/2010 – 9/30/2011	50
MO	Everest Springfield-Applied Management (Bachelor)	7/1/2010 – 9/30/2011	100
MO	Everest Springfield-Business Accounting (Diploma)	7/1/2010 – 9/30/2011	50
MO	Everest Springfield-Business Administration (AAS)	7/1/2010 – 9/30/2014	50
MO	Everest Springfield-Business Administration (Associate)	7/1/2010 – 9/30/2014	50
MO	Everest Springfield-Computer Information Science (AAS)	7/1/2011 – 9/30/2014	100
MO	Everest Springfield-Computer Information Science (Associate)	7/1/2011 – 9/30/2014	100
MO	Everest Springfield-Dental Assistant (Diploma)	7/1/2010 – 9/30/2011; 7/1/2013 – 9/30/2014	30
MO	Everest Springfield-Medical Administrative Assistant (Diploma)	7/1/2010 – 9/30/2014	30
MO	Everest Springfield-Medical Assistant (Associate)	7/1/2010 – 9/30/2014	30
MO	Everest Springfield-Medical Assistant (Diploma)	7/1/2010 – 9/30/2014	30
MO	Everest Springfield-Paralegal (Associate)	7/1/2010 – 9/30/2014	50
MO	Everest Springfield-Paralegal (Bachelor)	7/1/2010 – 9/30/2014	100
MO	Everest St. Louis (Earth City)-Business Accounting (Diploma)	7/1/2010 – 9/30/2014	50
MO	Everest St. Louis (Earth City)-Dental Assistant (Diploma)	7/1/2013 – 9/30/2014	30
MO	Everest St. Louis (Earth City)-Massage Therapy (Diploma)	7/1/2010 – 9/30/2011; 7/1/2013 – 9/30/2014	20
MO	Everest St. Louis (Earth City)-Medical Administrative Assistant (Diploma)	7/1/2010 – 9/30/2011; 7/1/2012 – 9/30/2014	30
MO	Everest St. Louis (Earth City)-Medical Assistant (Diploma)	7/1/2010 – 9/30/2011; 7/1/2012 – 9/30/2014	30

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MO	Everest St. Louis (Earth City)-Medical Insurance Billing and Coding (Diploma)	7/1/2010 – 9/30/2011	20
MO	Everest St. Louis (Earth City)-Pharmacy Technician (Diploma)	7/1/2012 – 9/30/2013	20
NJ	Everest South Plainfield-Electrician (Diploma)	7/1/2012 – 9/30/2014	20
NJ	Everest South Plainfield-Massage Therapy (Diploma)	7/1/2010 – 9/30/2011; 7/1/2012 – 9/30/2014	20
NJ	Everest South Plainfield-Medical Administrative Assistant (Diploma)	7/1/2010 – 9/30/2014	30
NJ	Everest South Plainfield-Medical Assistant (Diploma)	7/1/2010 – 9/30/2014	30
NJ	Everest South Plainfield-Medical Insurance Billing and Coding (Diploma)	7/1/2012 – 9/30/2013	20
NJ	Everest South Plainfield-Pharmacy Technician (Diploma)	7/1/2012 – 9/30/2013	20
NV	Everest Henderson-Accounting (Associate)	7/1/2010 – 9/30/2011 7/1/2012 – 9/30/2014	50
NV	Everest Henderson-Business (Associate)	7/1/2012 – 9/30/2014	50
NV	Everest Henderson-Criminal Justice – SAS	7/1/2010 – 9/30/2014	x
NV	Everest Henderson-Criminal Justice (Associate)	7/1/2010 – 9/30/2014	50
NV	Everest Henderson-Massage Therapy	7/1/2010 – 9/30/2014	20 x x x
NV	Everest Henderson-Nursing (Associate)	7/1/2013 – 9/30/2014	100
NV	Everest Henderson-Paralegal – SAS	7/1/2010 – 9/30/2011; 7/1/2012 – 9/30/2013	x
NV	Everest Henderson-Paralegal (Associate)	7/1/2010 – 9/30/2011 7/1/2012 – 9/30/2013	50
NY	Everest Rochester-Accounting (Associate)	7/1/2010 – 9/30/2014	50
NY	Everest Rochester-Administrative Office Technology (Associate)	7/1/2011 – 9/30/2013	20
NY	Everest Rochester-Business (Associate)	7/1/2011 – 9/30/2014	50
NY	Everest Rochester-Business Accounting and Applications (Diploma)	7/1/2010 – 9/30/2014	x
NY	Everest Rochester-Business Management (Diploma)	7/1/2010 – 9/30/2014	100
NY	Everest Rochester-Criminal Justice (Associate)	7/1/2010 – 9/30/2011; 7/1/2013 – 9/30/2014	50
NY	Everest Rochester-Medical Assistant (AAS)	7/1/2010 – 9/30/2013	30
NY	Everest Rochester-Medical Assistant (Associate)	7/1/2010 – 9/30/2013	30
NY	Everest Rochester-Medical Assistant (Diploma)	7/1/2010 – 9/30/2013	30
OH	Everest Columbus (Gahanna)-Dental Assistant (Diploma)	7/1/2012 – 9/30/2014	30
OH	Everest Columbus (Gahanna)-Medical Administrative Assistant (Diploma)	7/1/2010 – 9/30/2014	30
OH	Everest Columbus (Gahanna)-Medical Assistant (Diploma)	7/1/2010 – 9/30/2014	30
OH	Everest Columbus (Gahanna)-Medical Insurance Billing and Coding (Diploma)	7/1/2010 – 9/30/2014	20
OH	Everest Columbus (Gahanna)-Pharmacy Technician (Diploma)	7/1/2011 – 9/30/2012; 7/1/2013 – 9/30/2014	20
OR	Everest Portland-Accounting (Associate)	7/1/2011 – 9/30/2014	50
OR	Everest Portland-Accounting (Diploma)	7/1/2011 – 9/30/2014	50
OR	Everest Portland-Administrative Medical Assistant (Diploma)	7/1/2011 – 9/30/2014	30

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OR	Everest Portland-Business Accounting (Diploma)	7/1/2011 – 9/30/2014	50				
OR	Everest Portland-Computer Information Science (Associate)	7/1/2011 – 9/30/2014	100				
OR	Everest Portland-Criminal Justice (Associate)	7/1/2011 – 9/30/2014	50				
OR	Everest Portland-Medical Assistant (Associate)	7/1/2011 – 9/30/2014	30				
OR	Everest Portland-Medical Assistant (Diploma)	7/1/2011 – 9/30/2014	30				
OR	Everest Portland-Medical Insurance Billing and Coding (Diploma)	7/1/2011 – 9/30/2013	20				
OR	Everest Portland-Network and Internet Security Specialist (Diploma)	7/1/2011 – 9/30/2014	10				
OR	Everest Portland-Paralegal (Associate)	7/1/2011 – 9/30/2014	50				
OR	Everest Portland-Pharmacy Technician (Associate)	7/1/2011 – 9/30/2013	10				
OR	Everest Portland-Pharmacy Technician (Diploma)	7/1/2011 – 9/30/2014	20				
OR	Everest Tigard- Massage Therapy (Diploma)	7/1/2010 – 9/30/2012; 7/1/2013 – 9/30/2014	20				
OR	Everest Tigard-Massage Therapy Spa Specialist (Diploma)	7/1/2010 – 9/30/2012; 7/1/2013 – 9/30/2014	20				
OR	Everest Tigard-Massage Therapy Sports Specialist (Diploma)	7/1/2010 – 9/30/2014	20				
OR	Everest Tigard-Medical Assistant (Diploma)	7/1/2011 – 9/30/2012	30				
OR	Everest Tigard-Medical Insurance Billing and Coding (Diploma)	7/1/2011 – 9/30/2012	20				
OR	Everest Tigard-Pharmacy Technician (Diploma)	7/1/2013 – 9/30/2014	20				
PA	Everest Bensalem-Dental Assistant (Diploma)	7/1/2013 – 9/30/2014	30				
PA	Everest Bensalem-Medical Assistant (Diploma)	7/1/2013 – 9/30/2014	30				
PA	Everest Bensalem-Medical Insurance Billing and Coding (Diploma)	7/1/2013 – 9/30/2014	20				
PA	Everest Pittsburgh-Accounting (Associate)	7/1/2010 – 9/30/2014	50				
PA	Everest Pittsburgh-Business (Associate)	7/1/2010 – 9/30/2014	50				
PA	Everest Pittsburgh-Business Administration (Associate)	7/1/2010 – 9/30/2014	50				
PA	Everest Pittsburgh-Career Access Program	7/1/2010 – 9/30/2014	10	x	x	x	
PA	Everest Pittsburgh-Criminal Justice (Associate)	7/1/2012 – 9/30/2014	50				
PA	Everest Pittsburgh-Medical Administrative Assistant (Diploma)	7/1/2010 – 9/30/2011; 7/1/2013 – 9/30/2014	30				
PA	Everest Pittsburgh-Medical Assistant (Diploma)	7/1/2010 – 9/30/2011; 7/1/2013 – 9/30/2014	30				
PA	Everest Pittsburgh-Medical Insurance Billing and Coding (Diploma)	7/1/2010 – 9/30/2012; 7/1/2013 – 9/30/2014	20				
PA	Everest Pittsburgh-Paralegal (Associate)	7/1/2010 – 9/30/2011	50				
PA	Everest Pittsburgh-Patient Care Technician (Diploma)	7/1/2010 – 9/30/2011; 7/1/2013 – 9/30/2014	20				
PA	Everest Pittsburgh-Pharmacy Technician (Associate)	7/1/2010 – 9/30/2011; 7/1/2012 – 9/30/2014	10				
PA	Everest Pittsburgh-Pharmacy Technician (Diploma)	7/1/2010 – 9/30/2011; 7/1/2012 – 9/30/2014	20				
PA	WyoTech Blairsville-Auto/Diesel Vehicle Technology (Diploma)	7/1/2010 – 9/30/2014	20				
PA	WyoTech Blairsville-Automotive Technology and Management (Associate)	7/1/2010 – 9/30/2014	10				
PA	WyoTech Blairsville-Automotive Technology with High Performance Power Transmission (Diploma)	7/1/2010 – 9/30/2014	10				

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PA	WyoTech Blairsville-Automotive Technology with Light Duty Diesel (Diploma)	7/1/2010 – 9/30/2014	20
PA	WyoTech Blairsville-Automotive Technology with Trim and Upholstery Technology (Diploma)	7/1/2010 – 9/30/2014	10
PA	WyoTech Blairsville-Collision/Refinishing and Upholstery Technology (Diploma)	7/1/2011 – 9/30/2013	10
PA	WyoTech Blairsville-Collision/Refinishing Technology and Management (Associate)	7/1/2011 – 9/30/2014	30
PA	WyoTech Blairsville-Diesel Technology and Management (Associate)	7/1/2012 – 9/30/2014	20
PA	WyoTech Blairsville-Diesel Technology with High Performance Power Transmission (Diploma)	7/1/2012 – 9/30/2014	20
PA	WyoTech Blairsville-Diesel/Auto Vehicle Technology (Diploma)	7/1/2012 – 9/30/2014	20
PA	WyoTech Blairsville-Motorsports Chassis Fabrication with Automotive Technology (Diploma)	7/1/2011 – 9/30/2012; 7/1/2013 – 9/30/2014	30
PA	WyoTech Blairsville-Motorsports Chassis Fabrication with Collision/Refinishing Technology (Diploma)	7/1/2011 – 9/30/2012; 7/1/2013 – 9/30/2014	30
PA	WyoTech Blairsville-Motorsports Chassis Fabrication with Diesel Technology (Diploma)	7/1/2011 – 9/30/2012; 7/1/2013 – 9/30/2014	20
PA	WyoTech Blairsville-Street Rod and Custom Fabrication with Automotive Technology (Diploma)	7/1/2011 – 9/30/2014	10
PA	WyoTech Blairsville-Street Rod and Custom Fabrication with Collision/Refinishing Technology (Diploma)	7/1/2011 – 9/30/2014	10
PA	WyoTech Blairsville-Street Rod and Custom Fabrication with Diesel Technology (Diploma)	7/1/2011 – 9/30/2014	20
TX	Everest Arlington (Mid Cities)-Business (Associate)	7/1/2010 – 9/30/2012; 7/1/2013 – 9/30/2014	50
TX	Everest Arlington (Mid Cities)-Business Administration (Associate)	7/1/2010 – 9/30/2014	50
TX	Everest Arlington (Mid Cities)-Criminal Justice (Associate)	7/1/2010 – 9/30/2011; 7/1/2013 – 9/30/2014	50
TX	Everest Arlington (Mid Cities)-Electrical Technician (Diploma)	7/1/2012 – 9/30/2014	20
TX	Everest Arlington (Mid Cities)-Electrician (Diploma)	7/1/2012 – 9/30/2014	20
TX	Everest Arlington (Mid Cities)-Heating, Ventilation and Air Conditioning (Diploma)	7/1/2013 – 9/30/2014	30
TX	Everest Arlington (Mid Cities)-Medical Administrative Assistant (Diploma)	7/1/2010 – 9/30/2011; 7/1/2013 – 9/30/2014	30
TX	Everest Arlington (Mid Cities)-Medical Assistant (Associate)	7/1/2010 9/30/2014	30
TX	Everest Arlington (Mid Cities)-Medical Assistant (Diploma)	7/1/2010 – 9/30/2011; 7/1/2013 – 9/30/2014	30
TX	Everest Arlington (Mid Cities)-Medical Insurance Billing and Coding (Diploma)	7/1/2010 – 9/30/2011; 7/1/2013 – 9/30/2014	20
TX	Everest Arlington (Mid Cities)-Pharmacy Technician (Associate)	7/1/2010 – 9/30/2011; 7/1/2013 – 9/30/2014	10
TX	Everest Arlington (Mid Cities)-Pharmacy Technician (Diploma)	7/1/2010 – 9/30/2011; 7/1/2013 – 9/30/2014	20
TX	Everest Austin-Dental Assistant (Diploma)	7/1/2010 – 9/30/2011; 7/1/2012 – 9/30/2014	30
TX	Everest Austin-Electrical Technician (Diploma)	7/1/2012 – 9/30/2014	20

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TX	Everest Austin-Electrician (Diploma)	7/1/2012 – 9/30/2014	20
TX	Everest Austin-Heating, Ventilation and Air Conditioning (Diploma)	7/1/2010 – 9/30/2011; 7/1/2012 – 9/30/2014	30
TX	Everest Austin-Medical Administrative Assistant (Diploma)	7/1/2010 – 9/30/2014	30
TX	Everest Austin-Medical Assistant (Diploma)	7/1/2010 – 9/30/2014	30
TX	Everest Austin-Medical Insurance Billing and Coding (Diploma)	7/1/2010 – 9/30/2011	20
TX	Everest Dallas-Business Administration (Associate)	7/1/2011 – 9/30/2014	50
TX	Everest Dallas-Criminal Justice (Associate)	7/1/2012 – 9/30/2014	50
TX	Everest Dallas-Medical Administrative Assistant (Diploma)	7/1/2013 – 9/30/2014	30
TX	Everest Dallas-Medical Assistant (Associate)	7/1/2013 – 9/30/2014	30
TX	Everest Dallas-Medical Assistant (Diploma)	7/1/2013 – 9/30/2014	30
TX	Everest Dallas-Medical Insurance Billing and Coding (Diploma)	7/1/2011 – 9/30/2014	20
TX	Everest Dallas-Paralegal (Associate)	7/1/2012 – 9/30/2014	50
TX	Everest Fort Worth North-Business (Associate)	7/1/2010 – 9/30/2014	50
TX	Everest Fort Worth North-Business Administration (AAS)	7/1/2010 – 9/30/2014	50
TX	Everest Fort Worth North-Business Administration (AS)	7/1/2010 – 9/30/2014	50
TX	Everest Fort Worth North-Business Administration (Associate)	7/1/2010 – 9/30/2014	50
TX	Everest Fort Worth North-Criminal Justice (Associate)	7/1/2012 – 9/30/2014	50
TX	Everest Fort Worth North-Dental Assisting (Diploma)	7/1/2011 – 9/30/2014	30
TX	Everest Fort Worth North-Medical Administrative Assistant (Diploma)	7/1/2010 – 9/30/2014	30
TX	Everest Fort Worth North-Medical Assistant (Associate)	7/1/2010 – 9/30/2014	30
TX	Everest Fort Worth North-Medical Assisting (Diploma)	7/1/2010 – 9/30/2014	30
TX	Everest Fort Worth North-Medical Insurance Billing and Coding (Diploma)	7/1/2010 – 9/30/2012	20
TX	Everest Fort Worth North-Paralegal (AAS)	7/1/2010 – 9/30/2014	50
TX	Everest Fort Worth North-Paralegal (Associate)	7/1/2010 – 9/30/2014	50
TX	Everest Fort Worth North-Pharmacy Technician (Diploma)	7/1/2010 – 9/30/2014	20
TX	Everest Fort Worth South-Dental Assistant (Diploma)	7/1/2013 – 9/30/2014	30
TX	Everest Fort Worth South-Medical Administrative Assistant (Diploma)	7/1/2012 – 9/30/2013	30
TX	Everest Fort Worth South-Medical Assistant (Diploma)	7/1/2012 – 9/30/2013	30
TX	Everest Fort Worth South-Medical Insurance Billing and Coding (Diploma)	7/1/2012 – 9/30/2013	20
TX	Everest Houston (Bissonnet)-Carpentry (Diploma)	7/1/2011 – 9/30/2014	30
TX	Everest Houston (Bissonnet)-Electrical Technician (Diploma)	7/1/2011 – 9/30/2014	20
TX	Everest Houston (Bissonnet)-Heating, Ventilation and Air Conditioning (Diploma)	7/1/2012 – 9/30/2014	30
TX	Everest Houston (Bissonnet)-Medical Administrative Assistant (Diploma)	7/1/2011 – 9/30/2014	30
TX	Everest Houston (Bissonnet)-Medical Assistant (Diploma)	7/1/2011 – 9/30/2014	30
TX	Everest Houston (Bissonnet)-Medical Insurance Billing and Coding (Diploma)	7/1/2011 – 9/30/2014	20
TX	Everest Houston (Bissonnet)-Plumbing Technology (Diploma)	7/1/2011 – 9/30/2014	30

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TX	Everest Houston (Greenspoint)-Dental Assistant (Diploma)	7/1/2010 – 9/30/2012; 7/1/2013 – 9/30/2014	30				
TX	Everest Houston (Greenspoint)-Medical Administrative Assistant (Diploma)	7/1/2010 – 9/30/2012.	30				
TX	Everest Houston (Greenspoint)-Medical Assistant (Diploma)	7/1/2010 – 9/30/2012	30				
TX	Everest Houston (Hobby)-Medical Administrative Assistant (Diploma)	7/1/2010 – 9/30/2014	30				
TX	Everest Houston (Hobby)-Medical Assistant (Diploma)	7/1/2010 – 9/30/2014	30				
TX	Everest Houston (Hobby)-Medical Insurance Billing and Coding (Diploma)	7/1/2011 – 9/30/2012	20				
TX	Everest San Antonio-Medical Administrative Assistant (Diploma)	7/1/2010 – 9/30/2011; 7/1/2012 – 9/30/2014	30				
TX	Everest San Antonio-Medical Assistant (Diploma)	7/1/2010 – 9/30/2011; 7/1/2012 – 9/30/2014	30				
TX	Everest San Antonio-Medical Insurance Billing and Coding (Diploma)	7/1/2010 – 9/30/2011	20				
TX	Everest San Antonio-Pharmacy Technology (all credential levels)	7/1/2010 – 9/30/2014	20	10	x	x	
UT	Everest Salt Lake City-Applied Management (Bachelor)	7/1/2011 – 9/30/2012; 7/1/2013 – 9/30/2014	100				
UT	Everest Salt Lake City-Computer Information Science (Bachelor)	7/1/2013 – 9/30/2014	100				
UT	Everest Salt Lake City-Criminal Justice (Associate)	7/1/2013 – 9/30/2014	50				
UT	Everest Salt Lake City-Criminal Justice (Bachelor)	7/1/2011 – 9/30/2014	50				
UT	Everest Salt Lake City-Criminal Justice Private and Homeland Security (Diploma)	7/1/2013 – 9/30/2014	100				
UT	Everest Salt Lake City-Criminal Justice Social and Youth Services (Diploma)	7/1/2013 – 9/30/2014	x				
UT	Everest Salt Lake City-Medical Administrative Assistant (Diploma)	7/1/2011 – 9/30/2014	30				
UT	Everest Salt Lake City-Medical Assistant (Associate)	7/1/2011 – 9/30/2014	30				
UT	Everest Salt Lake City-Medical Assistant (Diploma)	7/1/2011 – 9/30/2014	30				
UT	Everest Salt Lake City-Medical Insurance Billing and Coding (Diploma)	7/1/2011 – 9/30/2013	20				
UT	Everest Salt Lake City-Paralegal (Associate)	7/1/2011 – 9/30/2011; 7/1/2013 – 9/30/2014	50				
UT	Everest Salt Lake City-Pharmacy Technician (Associate)	7/1/2011 – 9/30/2012; 7/1/2013 – 9/30/2014	10				
UT	Everest Salt Lake City-Pharmacy Technician (Diploma)	7/1/2011 – 9/30/2012; 7/1/2013 – 9/30/2014	20				
VA	Everest Arlington-Business (Associate)	7/1/2010 – 9/30/2014	50				
VA	Everest Arlington-Business Administration (Associate)	7/1/2010 – 9/30/2014	50				
VA	Everest Arlington-Criminal Justice (Associate)	7/1/2010 – 9/30/2014	50				
VA	Everest Arlington-Homeland Security Specialist (Diploma)	7/1/2010 – 9/30/2014	100				
VA	Everest Arlington-Medical Assistant (Diploma)	7/1/2010 – 9/30/2014	30				
VA	Everest Arlington-Paralegal (Associate)	7/1/2011 – 9/30/2014	50				

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VA	Everest Chesapeake-Accounting (Associate)	7/1/2010 – 9/30/2013	50
VA	Everest Chesapeake-Business (Associate)	7/1/2010 – 9/30/2014	50
VA	Everest Chesapeake-Business Accounting (Associate)	7/1/2010 – 9/30/2014	50
VA	Everest Chesapeake-Criminal Justice (Associate)	7/1/2011 – 9/30/2013	50
VA	Everest Chesapeake-Dental Assistant (Diploma)	7/1/2010 – 9/30/2013	30
VA	Everest Chesapeake-Electrician (Diploma)	7/1/2012 – 9/30/2013	20
VA	Everest Chesapeake-Heating, Ventilation and Air Conditioning (Diploma)	7/1/2012 – 9/30/2013	30
VA	Everest Chesapeake-Massage Therapy (Diploma)	7/1/2010 – 9/30/2014	20
VA	Everest Chesapeake-Medical Administrative Assistant (Diploma)	7/1/2010 – 9/30/2013	30
VA	Everest Chesapeake-Medical Assistant (Diploma)	7/1/2010 – 9/30/2013	30
VA	Everest Chesapeake-Medical Insurance Billing and Coding (Diploma)	7/1/2010 – 9/30/2014	20
VA	Everest Chesapeake-Pharmacy Technician (Diploma)	7/1/2012 – 9/30/2013	20
VA	Everest Newport News-Business (Associate)	7/1/2010 – 9/30/2013	50
VA	Everest Newport News-Business Accounting (Associate)	7/1/2010 – 9/30/2014	50
VA	Everest Newport News-Criminal Justice (Associate)	7/1/2013 – 9/30/2014	50
VA	Everest Newport News-Massage Therapy (Diploma)	7/1/2010 – 9/30/2014	20
VA	Everest Newport News-Medical Administrative Assistant (Diploma)	7/1/2010 – 9/30/2012	30
VA	Everest Newport News-Medical Assistant (Diploma)	7/1/2010 – 9/30/2012	30
VA	Everest Newport News-Medical Insurance Billing and Coding (Diploma)	7/1/2010 – 9/30/2012	20
VA	Everest Tyson's Corner (McLean/Vienna)-Business Administration (Associate)	7/1/2012 – 9/30/2014	50
VA	Everest Tyson's Corner (McLean/Vienna)-Criminal Justice (Associate)	7/1/2010 – 9/30/2014	50
VA	Everest Tyson's Corner (McLean/Vienna)-Massage Therapy (Diploma)	7/1/2012 – 9/30/2014	20
VA	Everest Tyson's Corner (McLean/Vienna)-Medical Administrative Assistant (Diploma)	7/1/2010 – 9/30/2013	30
VA	Everest Tyson's Corner (McLean/Vienna)-Medical Assistant (Diploma)	7/1/2010 – 9/30/2013	30
VA	Everest Tyson's Corner (McLean/Vienna)-Medical Insurance Billing and Coding (Diploma)	7/1/2012 – 9/30/2014	20
WA	Everest Bremerton-Criminal Justice (Associate)	7/1/2013 – 9/30/2014	50
WA	Everest Bremerton-Dental Assistant (Diploma)	7/1/2011 – 9/30/2012; 7/1/2013 – 9/30/2014	30
WA	Everest Bremerton-Massage Therapy (Diploma)	7/1/2011 – 9/30/2014	20
WA	Everest Bremerton-Medical Administrative Assistant (Diploma)	7/1/2011 – 9/30/2012; 7/1/2013 – 9/30/2014	30
WA	Everest Bremerton-Medical Assistant (Diploma)	7/1/2011 – 9/30/2012; 7/1/2013 – 9/30/2014	30
WA	Everest Bremerton-Medical Insurance Billing and Coding (Diploma)	7/1/2011 – 9/30/2014	20

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WA	Everest Bremerton-Pharmacy Technician (Diploma)	7/1/2011 – 9/30/2012; 7/1/2013 – 9/30/2014	20
WA	Everest Everett-Dental Assistant (Diploma)	7/1/2011 – 9/30/2012	30
WA	Everest Everett-Medical Administrative Assistant (Diploma)	7/1/2010 – 9/30/2012	30
WA	Everest Everett-Medical Assistant (Diploma)	7/1/2010 – 9/30/2012	30
WA	Everest Everett-Medical Insurance Billing and Coding (Diploma)	7/1/2010 – 9/30/2011; 7/1/2012 – 9/30/2013	20
WA	Everest Everett-Pharmacy Technician (Diploma)	7/1/2010 – 9/30/2014	20
WA	Everest Renton-Dental Assistant (Diploma)	7/1/2010 – 9/30/2014	30
WA	Everest Renton-Medical Administrative Assistant (Diploma)	7/1/2010 – 9/30/2012; 7/1/2013 – 9/30/2014	30
WA	Everest Renton-Medical Assistant (Diploma)	7/1/2010 – 9/30/2012; 7/1/2013 – 9/30/2014	30
WA	Everest Renton-Medical Insurance Billing and Coding (Diploma)	7/1/2010 – 9/30/2014	20
WA	Everest Renton-Pharmacy Technician (Diploma)	7/1/2011 – 9/30/2012; 7/1/2013 – 9/30/2014	20
WA	Everest Seattle-Massage Therapy (Diploma)	7/1/2010 – 9/30/2013	20
WA	Everest Seattle-Massage Therapy Spa Specialist (Diploma)	7/1/2010 – 9/30/2014	20
WA	Everest Seattle-Medical Administrative Assistant (Diploma)	7/1/2011 – 9/30/2012; 7/1/2013 – 9/30/2014	30
WA	Everest Seattle-Medical Assistant (Diploma)	7/1/2011 – 9/30/2012; 7/1/2013 – 9/30/2014	30
WA	Everest Seattle-Medical Insurance Billing and Coding (Diploma)	7/1/2011 – 9/30/2013	20
WA	Everest Tacoma-Dental Assistant (Diploma)	7/1/2012 – 9/30/2014	30
WA	Everest Tacoma-Medical Administrative Assistant (Diploma)	7/1/2010 – 9/30/2011	30
WA	Everest Tacoma-Medical Assistant (Diploma)	7/1/2010 – 9/30/2011	30
WA	Everest Tacoma-Medical Insurance Billing and Coding (Diploma)	7/1/2013 – 9/30/2014	20
WA	Everest Tacoma-Pharmacy Technician (Diploma)	7/1/2010 – 9/30/2011; 7/1/2013 – 9/30/2014	20
WA	Everest Vancouver-Accounting (Associate)	7/1/2010 – 9/30/2014	50
WA	Everest Vancouver-Accounting/Business Administration (Diploma)	7/1/2010 – 9/30/2014	50
WA	Everest Vancouver-Administrative Medical Assistant (Diploma)	7/1/2010 – 9/30/2014	30
WA	Everest Vancouver-Executive Assistant (Associate)	7/1/2010 – 9/30/2012	x
WA	Everest Vancouver-Massage Therapy (Diploma)	7/1/2011 – 9/30/2014	20
WA	Everest Vancouver-Massage Therapy Spa Specialist (Diploma)	7/1/2011 – 9/30/2014	20
WA	Everest Vancouver-Massage Therapy Sports Specialist (Diploma)	7/1/2011 – 9/30/2014	20
WA	Everest Vancouver-Medical Administrative Assistant (Diploma)	7/1/2010 – 9/30/2014	30
WA	Everest Vancouver-Medical Assistant (Associate)	7/1/2010 – 9/30/2012	30
WA	Everest Vancouver-Medical Assistant (Diploma)	7/1/2010 – 9/30/2014	30
WA	Everest Vancouver-Medical Insurance Billing and Coding (Diploma)	7/1/2010 – 9/30/2014	20
WA	Everest Vancouver-Paralegal/Legal Assistant (Associate)	7/1/2010 – 9/30/2011	50

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WI	Everest Milwaukee-Dental Assistant (Diploma)	7/1/2012 – 9/30/2014	30				
WV	Everest Cross Lanes-Electronics, Computer and Communication Technology (Associate)	7/1/2010 – 9/30/2014	50				
WV	Everest Cross Lanes-Massage Therapy (Diploma)	7/1/2013 – 9/30/2014	20				
WV	Everest Cross Lanes-Medical Administrative Assistant (Diploma)	7/1/2010 – 9/30/2012; 7/1/2013 – 9/30/2014	30				
WV	Everest Cross Lanes-Medical Assistant (Diploma)	7/1/2010 – 9/30/2012; 7/1/2013 – 9/30/2014	30				
WY	WyoTech Laramie-Auto/Diesel Vehicle Technology (Diploma)	7/1/2010 – 9/30/2014	20				
WY	WyoTech Laramie-Automotive Technology (all credential levels)	7/1/2010 – 9/30/2014	10	10	x	x	
WY	WyoTech Laramie-Automotive Technology and Management (Associate)	7/1/2010 – 9/30/2014	10				
WY	WyoTech Laramie-Automotive Technology with Trim and Upholstery Technology (Diploma)	7/1/2010 – 9/30/2014	10				
WY	WyoTech Laramie-Collision Technology (all credential levels)	7/1/2010 – 9/30/2014	10	30	x	x	
WY	WyoTech Laramie-Collision/Refinishing (all credential levels)	7/1/2010 – 9/30/2012	10	30	x	x	
WY	WyoTech Laramie-Collision/Refinishing and Upholstery Technology (Diploma)	7/1/2010 – 9/30/2012	10				
WY	WyoTech Laramie-Collision/Refinishing Technology and Management (Associate)	7/1/2010 – 9/30/2012	30				
WY	WyoTech Laramie-Collision/Refinishing w/ St Rod & Mgmt (Diploma)	7/1/2010 – 9/30/2012	10				
WY	WyoTech Laramie-Collision/Refinishing with Specialization in Automotive Fabrication (Diploma)	7/1/2010 – 9/30/2012	10				
WY	WyoTech Laramie-Diesel Technician (all credential levels)	7/1/2010 – 9/30/2014	20	20	x	x	
WY	WyoTech Laramie-Diesel Technology (all credential levels)	7/1/2010 – 9/30/2014	20	20	x	x	
WY	WyoTech Laramie-Diesel Technology Advanced (Diploma)	7/1/2010 – 9/30/2014	20				
WY	WyoTech Laramie-Diesel Technology and Management (Associate)	7/1/2010 – 9/30/2014	20				
WY	WyoTech Laramie-Diesel Technology with Trim and Upholstery Technology (Diploma)	7/1/2010 – 9/30/2014	20				
WY	WyoTech Laramie-Diesel/Automotive Technology (all credential levels)	7/1/2010 – 9/30/2014	20	20	x	x	
WY	WyoTech Laramie-Diesel/Automotive Vehicle Technology (Diploma)	7/1/2010 – 9/30/2014	20				
WY	WyoTech Laramie-Motorsports Chassis Fabrication with Automotive Technology (Diploma)	7/1/2010 – 9/30/2012; 7/1/2013 – 9/30/2014	30				
WY	WyoTech Laramie-Motorsports Chassis Fabrication with Collision/Refinishing Technology (Diploma)	7/1/2010 – 9/30/2012; 7/1/2013 – 9/30/2014	30				
WY	WyoTech Laramie-Motorsports Chassis Fabrication with Diesel Technology (Diploma)	7/1/2010 – 9/30/2012; 7/1/2013 – 9/30/2014	20				
WY	WyoTech Laramie-Street Rod and Custom Fabrication with Automotive Technology (Diploma)	7/1/2010 – 9/30/2011; 7/1/2012 – 9/30/2014	10				
WY	WyoTech Laramie-Street Rod and Custom Fabrication with Collision/Refinishing Technology (Diploma)	7/1/2010 – 9/30/2011; 7/1/2012 – 9/30/2014	10				
WY	WyoTech Laramie-Street Rod and Custom Fabrication with Diesel Technology (Diploma)	7/1/2010 – 9/30/2011; 7/1/2012 – 9/30/2014	20				

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Appendix D: Condensed Heald Findings List

CAMPUS NAME	CAMPUS PROGRAM	ENROLLMENT ON OR AFTER	Relief %			
			D	A	B	M
CONCORD	Accounting	7/1/2010	50	50	50	x
	Business Accounting	7/1/2010	50	50	50	x
	Business Administration	7/1/2010	100	50	100	100
	Business Administration – Accounting Emphasis	7/1/2010	50	50	50	x
	Business Administration – Criminal Justice	7/1/2010	100	50	50	40
	Business Administration - Software Technologies Emphasis	7/1/2010	x	10	x	x
	Entrepreneurship	7/1/2010	x	50	x	x
	Construction Management	7/1/2012	x	50	x	x
	Criminal Justice	7/1/2010	100	50	50	40
	Dental Assisting	7/1/2010	30	40	x	x
	IT – Network Security	7/1/2010	10	40	x	x
	IT – Network Systems Administration	7/1/2010	10	40	x	x
	Medical Administrative Asst	7/1/2010	30	10	x	x
	Medical Assisting	7/1/2010	30	30	x	x
	Medical Insurance Billing & Coding	7/1/2010	20	20	x	x
	Medical Office Administration	7/1/2010	20	30	x	x
	Office Skills	7/1/2011	20	x	x	x
	Paralegal	7/1/2011	100	50	100	x
	Pharmacy Technology	7/1/2012	20	10	xx	x
FRESNO	Accounting	7/1/2010	50	50	50	x
	Business Administration	7/1/2010	100	50	100	100
	Business Administration – Accounting Emphasis	7/1/2010	50	50	50	x
	Business Administration – Criminal Justice	7/1/2010	100	50	50	40
	Business Administration - Software Technologies Emphasis	7/1/2010	x	10	x	x
	Entrepreneurship	7/1/2010	x	50	x	x
	Criminal Justice	7/1/2010	100	50	50	40
	IT Network Systems Administration	7/1/2010	10	40	x	x
	Medical Assisting	7/1/2010	30	30	x	x
	Medical Insurance Billing & Coding	7/1/2010	20	20	x	x
	Medical Office Administration	7/1/2010	20	30	x	x
	Office Skills	7/1/2010	20	x	x	x
	Paralegal	7/1/2011	100	50	100	x
	Pharmacy Technology	7/1/2012	20	10	x	x
HAYWARD	Accounting	7/1/2010	50	50	50	x
	Business Accounting	7/1/2010	50	50	50	x

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	Business Administration	7/1/2010	100	50	100	100
	Business Administration – Accounting Emphasis	7/1/2010	50	50	50	x
	Business Administration – Sales/Marketing Emphasis	7/1/2010	x	50	x	x
	Business Administration - Software Technologies Emphasis	7/1/2010	x	10	x	x
	Entrepreneurship	7/1/2010	x	50	x	x
	Construction Management	7/1/2012	x	50	x	x
	Criminal Justice	7/1/2010	100	50	50	40
	Dental Assisting	7/1/2010	30	40	x	x
	IT – Network Security	7/1/2010	10	40	x	x
	IT – Network Systems Administration	7/1/2010	10	40	x	x
	Medical Assisting	7/1/2010	30	30	x	x
	Medical Insurance Billing & Coding	7/1/2010	20	20	x	x
	Medical Office Administration	7/1/2010	20	30	x	x
	Office Skills	7/1/2011	20	x	x	x
	Paralegal	7/1/2011	100	50	100	x
	Pharmacy Technology	7/1/2012	20	10	x	x
HONOLULU	Accounting	7/1/2010	50	50	50	x
	Business Accounting	7/1/2010	50	50	50	x
	Business Administration	7/1/2010	100	50	100	100
	Business Administration – Accounting	7/1/2010	50	50	50	x
	Business Administration – Hospitality and Tourism	7/1/2010	x	20	x	x
	Business Administration – Sales and Marketing	7/1/2010	x	50	x	x
	Business Administration – Software Technologies	7/1/2010	x	10	x	x
	Business Administration – Accounting Emphasis	7/1/2010	50	50	50	x
	Business Administration – Hospitality/Tourism Emphasis	7/1/2010	x	20	x	x
	Business Administration – Sales/Marketing Emphasis	7/1/2010	x	50	x	x
	Business Administration - Software Technologies Emphasis	7/1/2010	x	10	x	x
	Entrepreneurship	7/1/2010	x	50	x	x
	Construction Management	7/1/2012	x	50	x	x
	Criminal Justice	7/1/2012	100	50	50	40
	Dental Assisting	7/1/2010	30	40	x	x
	Electronics Technology	7/1/2010	30	20	x	x
	Health Information Technology	7/1/2010	x	10	x	x

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	IT – Network Systems Administration	7/1/2010	10	40	x	x
	Medical Assisting	7/1/2010	30	30	x	x
	Medical Office Administration	7/1/2010	20	30	x	x
	Networking Technology (all emphases)	7/1/2010	10	40	x	x
	Office Skills	7/1/2010	20	x	x	x
	Paralegal	2/13/2014	100	50	100	x
	Pharmacy Technology	7/1/2012	20	10	x	x
	Web Design	7/1/2010	10	40	x	x
MILIPITAS / SAN JOSE	Accounting	7/1/2010	50	50	50	x
	Business Accounting	7/1/2010	50	50	50	x
	Business Administration	7/1/2010	100	50	100	100
	Business Administration – Accounting	7/1/2010	50	50	50	x
	Business Administration – Criminal Justice	7/1/2010	100	50	50	40
	Business Administration – Accounting Emphasis	7/1/2010	50	50	50	x
	Entrepreneurship	7/1/2010	x	50	x	x
	Construction Management	7/1/2012	x	50	x	x
	Criminal Justice	7/1/2010	100	50	50	40
	Electronics Technology	7/1/2010	30	20	x	x
	IT – Network Security (all emphases)	7/1/2010	10	40	x	x
	Medical Assisting	7/1/2010	30	30	x	x
	Medical Insurance Billing & Coding	7/1/2010	20	20	x	x
	Medical Office Administration	7/1/2010	20	30	x	x
	Office Skills	7/1/2010	20	x	x	x
	Paralegal	7/1/2011	100	50	100	x
	Pharmacy Technology	7/1/2012	20	10	x	x
PORTLAND	Accounting	7/1/2010	50	50	50	x
	Business Administration	7/1/2010	100	50	100	100
	Business Administration – Accounting	7/1/2010	50	50	50	x
	Business Administration – Criminal Justice	7/1/2010	100	50	50	40
	Business Administration – Accounting Emphasis	7/1/2010	50	50	50	x
	Entrepreneurship	7/1/2010	x	50	x	x
	Construction Management	7/1/2012	x	50	x	x
	Criminal Justice	7/1/2010	100	50	50	40
	Dental Assisting	2/3/2014	30	40	x	x
	IT – Network Systems Administration	7/1/2010	10	40	x	x
	Medical Assisting	7/1/2010	30	30	x	x
	Medical Insurance Billing & Coding	7/1/2010	20	20	x	x
	Medical Office Administration	7/1/2010	20	30	x	x
	Office Skills	7/1/2011	20	x	x	x

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	Paralegal	7/1/2011	100	50	100	x
	Pharmacy Technology	7/1/2012	20	10	x	x
RANCHO CORDOVA	Accounting	7/1/2010	50	50	50	x
	Business Administration	7/1/2010	100	50	100	100
	Business Administration – Accounting	7/1/2010	50	50	50	x
	Business Administration – Criminal Justice	7/1/2010	100	50	50	40
	Business Administration – Accounting Emphasis	7/1/2010	50	50	50	x
	Entrepreneurship	7/1/2010	x	50	x	x
	Construction Management	7/1/2012	x	50	x	x
	Criminal Justice	7/1/2010	100	50	50	40
	IT – Network Security	7/1/2010	10	40	x	x
	Medical Assisting	7/1/2010	30	30	x	x
	Medical Insurance Billing & Coding	7/1/2010	20	20	x	x
	Medical Office Administration	7/1/2010	20	30	x	x
	Office Skills	7/1/2010	20	x	x	x
	Paralegal	7/1/2011	100	50	100	x
	Pharmacy Technology	7/1/2012	20	10	x	x
ROSEVILLE	Accounting	7/1/2010	50	50	50	x
	Business Accounting	7/1/2010	50	50	50	x
	Business Administration	7/1/2010	100	50	100	100
	Business Administration – Accounting	7/1/2010	50	50	50	x
	Business Administration – Criminal Justice	7/1/2010	100	50	50	40
	Business Administration – Accounting Emphasis	7/1/2010	50	50	50	x
	Entrepreneurship	7/1/2010	x	50	x	x
	Construction Management	7/1/2012	x	50	x	x
	Criminal Justice	7/1/2010	100	50	50	40
	IT – Network Security	7/1/2010	10	40	x	x
	Medical Assisting	7/1/2010	30	30	x	x
	Medical Insurance Billing & Coding	7/1/2010	20	20	x	x
	Medical Office Administration	7/1/2010	20	30	x	x
	Office Skills	7/1/2012	20	x	x	x
	Paralegal	7/1/2011	100	50	100	x
	Pharmacy Technology	7/1/2012	20	10	x	x
SALIDA / MODESTO	Accounting	2/13/2014	50	50	50	x
	Business Administration	2/13/2014	100	50	100	100
	Criminal Justice	7/1/2012	100	50	50	40
	Dental Assisting	7/1/2011	30	40	x	x

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	Medical Assisting	7/1/2011	30	30	x	x
	Medical Insurance Billing & Coding	7/1/2012	20	20	x	x
	Medical Office Administration	2/13/2014	20	30	x	x
	Paralegal	2/13/2014	100	50	100	x
SALINAS	Accounting	7/1/2010	50	50	50	x
	Business Accounting	7/1/2010	50	50	50	x
	Business Administration	7/1/2010	100	50	100	100
	Business Administration – Accounting	7/1/2010	50	50	50	x
	Business Administration – Criminal Justice	7/1/2010	100	50	50	40
	Business Administration – Accounting Emphasis	7/1/2010	50	50	50	x
	Entrepreneurship	7/1/2010	x	50	x	x
	Criminal Justice	7/1/2010	100	50	50	40
	Medical Assisting	7/1/2010	30	30	x	x
	Medical Insurance Billing & Coding	7/1/2010	20	20	x	x
	Medical Office Administration	7/1/2010	20	30	x	x
	Office Skills	7/1/2010	20	x	x	x
	Paralegal	7/1/2011	100	50	100	x
	Pharmacy Technology	7/1/2012	20	10	x	x
SAN FRANCISCO	Accounting	7/1/2010	50	50	50	x
	Business Accounting	7/1/2010	50	50	50	x
	Business Administration	7/1/2010	100	50	100	100
	Business Administration – Accounting	7/1/2010	50	50	50	x
	Business Administration – Criminal Justice	7/1/2010	100	50	50	40
	Business Administration – Software Technologies	7/1/2010	x	10	x	10
	Business Administration – Accounting Emphasis	7/1/2010	50	50	50	x
	Business Administration – Software Technology Emphasis	7/1/2010	x	10	x	x
	Entrepreneurship	7/1/2010	x	50	x	x
	Construction Management	7/1/2012	x	50	x	x
	Criminal Justice	7/1/2010	100	50	50	40
	Electronics Technology	7/1/2010	30	20	x	x
	IT – Network Security (all emphases)	7/1/2010	10	40	x	x
	IT – Network Systems Administration	7/1/2010	10	40	x	x
	Medical Assisting	7/1/2010	30	30	x	x
	Medical Insurance Billing & Coding	7/1/2010	20	20	x	x
	Medical Office Administration	7/1/2010	20	30	x	x
	Office Skills	7/1/2010	20	x	x	x
	Paralegal	7/1/2011	100	50	100	x
	Pharmacy Technology	7/1/2012	20	10	x	x

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STOCKTON	Accounting	7/1/2010	50	50	50	x
	Business Administration	7/1/2010	100	50	100	100
	Business Administration – Accounting	7/1/2010	50	50	50	x
	Business Administration – Criminal Justice	7/1/2010	100	50	50	40
	Business Administration – Accounting Emphasis	7/1/2010	50	50	50	x
	Entrepreneurship	7/1/2010	x	50	x	x
	Construction Management	7/1/2012	x	50	x	x
	Criminal Justice	7/1/2010	100	50	50	40
	Dental Assisting	7/1/2010	30	40	x	x
	IT – Network Systems Administration	7/1/2010	10	40	x	x
	Networking Technology – all emphases	7/1/2010	10	40	x	x
	Medical Assisting	7/1/2010	30	30	x	x
	Medical Insurance Billing & Coding	7/1/2010	20	20	x	x
	Medical Office Administration	7/1/2010	20	30	x	x
	Office Skills	7/1/2010	20	x	x	x
	Paralegal	7/1/2011	100	50	100	x
	Pharmacy Technology	2/3/2014	20	10	x	x

EXHIBIT 2

Count of CIP Code			Official Program Pass/Zone/Fail			
Institution Name	Institution Code (six-digit	City	FAIL	PASS	ZONE	Grand Total
EVEREST COLLEGE	004503	COLORADO SPRINGS			5	5
	004503 Total				5	5
	004507	THORNTON	1	4	1	6
	004507 Total		1	4	1	6
	009079	PORTLAND		3	3	6
	009079 Total			3	3	6
	009267	CHESAPEAKE			8	8
	009267 Total				8	8
	011858	SKOKIE		4	2	6
	011858 Total			4	2	6
	022375	HENDERSON			4	4
	022375 Total				4	4
	022506	SPRINGFIELD		4	3	7
	022506 Total			4	3	7
	022985	SALT LAKE CITY	3	3	3	9
	022985 Total		3	3	3	9
	023001	EVERETT		3	4	7
	023001 Total			3	4	7
	026062	RENTON		9		9
	026062 Total			9		9
	026175	WOODBIDGE		3		3
	026175 Total			3		3
EVEREST COLLEGE Total			4	33	33	70
EVEREST INSTITUTE	007091	PITTSBURGH	2	1	1	4
	007091 Total		2	1	1	4
	009828	SOUTHFIELD		5	8	13
	009828 Total			5	8	13
	022613	SAN ANTONIO		2	3	5
	022613 Total			2	3	5

EVEREST INSTITUTE Total			2	8	12	22
EVEREST UNIVERSITY	001499	TAMPA		5	4	9
	001499 Total			5	4	9
EVEREST UNIVERSITY Total				5	4	9
WYOTECH	009157	LARAMIE		3		3
	009157 Total			3		3
	023462	ORMOND BEACH		2		2
	023462 Total			2		2
WYOTECH Total				5		5
Grand Total			6	51	49	106

Institution Code (Six-Digit)	Institution Name	City	State	Zip	Institution Type	CIP Code	CIP Name	Credential Level	Official Program Pass/Fail/Zone	Appeal Status	Debt-to-Earnings Ratio	Debt-to-Earnings Annual Rate Numerator	Debt-to-Earnings Annual Rate Denominator	Debt-to-Earnings Ratio Pass/Fail/Zone	Debt-to-Earnings Discretionary Income Rate	Debt-to-Earnings Discretionary Income Rate Numerator	Debt-to-Earnings Discretionary Income Rate Denominator	Debt-to-Earnings Transitional Rate	Debt-to-Earnings Transitional Rate Numerator	Debt-to-Earnings Transitional Rate Denominator	Debt-to-Earnings Transitional Rate Pass/Fail/Zone	Mean Annual Earnings	Median Annual Earnings		
001007	CENTRAL ALABAMA COMMUNITY COLLEGE	ALEXANDER CITY	AL	350050000	PUBLIC 2 TO 3 YEARS	513901	LICENSED PRACTICAL/VOCATIONAL NURSE TRAINING	R1 - UNDERGRADUATE CERTIFICATE	PASS		2.5	879	35651	PASS	5.04	879	17496	PASS	N/A	N/A	N/A	N/A	N/A	12657	35061
001013	CAHOON COMMUNITY COLLEGE	TANNER	AL	356710000	PUBLIC 2 TO 3 YEARS	513901	LICENSED PRACTICAL/VOCATIONAL NURSE TRAINING	R1 - UNDERGRADUATE CERTIFICATE	PASS		0.78	243	31071	PASS	1.81	243	13416	PASS	N/A	N/A	N/A	N/A	N/A	26219	31071
001017	GADSDEN STATE COMMUNITY COLLEGE	GADSDEN	AL	358932269	PUBLIC 2 TO 3 YEARS	120401	COSMETOLOGY/COSMETOLOGIST, GENERAL	R1 - UNDERGRADUATE CERTIFICATE	PASS		0	0	12114	PASS	0	0	0	PASS	N/A	N/A	N/A	N/A	N/A	12114	11605
001017	GADSDEN STATE COMMUNITY COLLEGE	GADSDEN	AL	358932269	PUBLIC 2 TO 3 YEARS	480508	WELDING TECHNOLOGY/WELDER	R1 - UNDERGRADUATE CERTIFICATE	PASS		0	0	29750	PASS	0	0	12047	PASS	N/A	N/A	N/A	N/A	N/A	29104	29750
001017	GADSDEN STATE COMMUNITY COLLEGE	GADSDEN	AL	358932269	PUBLIC 2 TO 3 YEARS	510909	SURGICAL TECHNOLOGY/TECHNOLOGIST	R1 - UNDERGRADUATE CERTIFICATE	PASS		0	0	21598	PASS	0	0	5983	PASS	N/A	N/A	N/A	N/A	N/A	21605	21598
001017	GADSDEN STATE COMMUNITY COLLEGE	GADSDEN	AL	358932269	PUBLIC 2 TO 3 YEARS	513901	LICENSED PRACTICAL/VOCATIONAL NURSE TRAINING	R1 - UNDERGRADUATE CERTIFICATE	PASS		0	0	30152	PASS	0	0	12087	PASS	N/A	N/A	N/A	N/A	N/A	28794	30152
001018	GEORGE C. WALLACE COMMUNITY COLLEGE	DOTHAH	AL	363030043	PUBLIC 2 TO 3 YEARS	120401	COSMETOLOGY/COSMETOLOGIST, GENERAL	R1 - UNDERGRADUATE CERTIFICATE	PASS		0	0	9485	PASS	0	0	0	PASS	N/A	N/A	N/A	N/A	N/A	9485	9755
001018	GEORGE C. WALLACE COMMUNITY COLLEGE	DOTHAH	AL	363030043	PUBLIC 2 TO 3 YEARS	480508	WELDING TECHNOLOGY/WELDER	R1 - UNDERGRADUATE CERTIFICATE	PASS		0	0	17386	PASS	0	0	19731	PASS	N/A	N/A	N/A	N/A	N/A	15520	17386
001018	GEORGE C. WALLACE COMMUNITY COLLEGE	DOTHAH	AL	363030043	PUBLIC 2 TO 3 YEARS	513901	LICENSED PRACTICAL/VOCATIONAL NURSE TRAINING	R1 - UNDERGRADUATE CERTIFICATE	PASS		0	0	10467	PASS	0	0	12812	PASS	N/A	N/A	N/A	N/A	N/A	10424	10467
001021	JEFFERSON DAVIS COMMUNITY COLLEGE	BREITWYN	AL	364277200	PUBLIC 2 TO 3 YEARS	480508	WELDING TECHNOLOGY/WELDER	R1 - UNDERGRADUATE CERTIFICATE	PASS		0	0	11817	PASS	0	0	14482	PASS	N/A	N/A	N/A	N/A	N/A	11817	10559
001030	BISHOP STATE COMMUNITY COLLEGE	MOBILE	AL	366350988	PUBLIC 2 TO 3 YEARS	490205	FUEL AND SERVICE/COMMERCIAL VEHICLE OPERATOR AND INSTRUCTOR	R1 - UNDERGRADUATE CERTIFICATE	PASS		0	0	20876	PASS	0	0	9021	PASS	N/A	N/A	N/A	N/A	N/A	20876	19146
001030	BISHOP STATE COMMUNITY COLLEGE	MOBILE	AL	366350988	PUBLIC 2 TO 3 YEARS	513901	LICENSED PRACTICAL/VOCATIONAL NURSE TRAINING	R1 - UNDERGRADUATE CERTIFICATE	PASS		0	0	13284	PASS	0	0	15189	PASS	N/A	N/A	N/A	N/A	N/A	10618	13284
001034	ALABAMA SOUTHERN COMMUNITY COLLEGE	MONROEVILLE	AL	364605098	PUBLIC 2 TO 3 YEARS	120401	COSMETOLOGY/COSMETOLOGIST, GENERAL	R1 - UNDERGRADUATE CERTIFICATE	PASS		0	0	9731	PASS	0	0	0	PASS	N/A	N/A	N/A	N/A	N/A	9731	9701
001034	ALABAMA SOUTHERN COMMUNITY COLLEGE	MONROEVILLE	AL	364605098	PUBLIC 2 TO 3 YEARS	480508	WELDING TECHNOLOGY/WELDER	R1 - UNDERGRADUATE CERTIFICATE	PASS		0	0	20397	PASS	0	0	11652	PASS	N/A	N/A	N/A	N/A	N/A	20397	20356
001034	ALABAMA SOUTHERN COMMUNITY COLLEGE	MONROEVILLE	AL	364605098	PUBLIC 2 TO 3 YEARS	513901	LICENSED PRACTICAL/VOCATIONAL NURSE TRAINING	R1 - UNDERGRADUATE CERTIFICATE	PASS		0	0	27881	PASS	0	0	10026	PASS	N/A	N/A	N/A	N/A	N/A	26875	27881
001040	SOUTHERN UNION STATE COMMUNITY COLLEGE	WADELEY	AL	362760000	PUBLIC 2 TO 3 YEARS	513901	LICENSED PRACTICAL/VOCATIONAL NURSE TRAINING	R1 - UNDERGRADUATE CERTIFICATE	PASS		0	0	11419	PASS	0	0	11784	PASS	N/A	N/A	N/A	N/A	N/A	27676	11419
001052	UNIVERSITY OF ALABAMA AT BIRMINGHAM	BIRMINGHAM	AL	352941150	PUBLIC 4 YEARS OR MORE	100503	DENTAL CLINIC/SCHOOL, GENERAL	R1 - GRADUATE CERTIFICATE	PASS		1.97	4431	22449	PASS	3.14	4431	25684	PASS	N/A						

Institution Code (4- digit FPEID)	Institution Name	City	State	Zip	Institution Type	CIP Code	CIP Name	Credential Level	Official Program Pmt/Fnd/Fnl	Appeal Status	Debt-to-Earnings Annual Ratio	Debt-to-Earnings Annual Rate Numerator	Debt-to-Earnings Annual Rate Denominator	Debt-to-Earnings Annual Rate Pass/Fail/Zone	Debt-to-Earnings Disciplinary Income Rate Numerator	Debt-to-Earnings Disciplinary Income Rate Denominator	Debt-to-Earnings Disciplinary Income Rate Pass/Fail/Zone	Mean Annual Earnings	Median Annual Earnings					
01085	UNIVERSITY OF ARKANSAS AT MONTICELLO	MONTICELLO	AR	71656009	PUBLIC 4 YEARS OR MORE	470303	INDUSTRIAL MECHANICS AND MAINTENANCE TECHNOLOGY	01- UNDERGRADUATE CERTIFICATE	PASS		4.38	655	14939	PASS	100	655	0	FAIL	N/A	14939	10910			
01085	UNIVERSITY OF ARKANSAS AT MONTICELLO	MONTICELLO	AR	71656009	PUBLIC 4 YEARS OR MORE	510707	HEALTH INFORMATION/MEDICAL RECORDS TECHNOLOGY/TECHNICIAN	01- UNDERGRADUATE CERTIFICATE	PASS		2.78	535	19569	PASS	27.95	535	1354	N/A	N/A	19569	17667			
01085	UNIVERSITY OF ARKANSAS AT MONTICELLO	MONTICELLO	AR	71656009	PUBLIC 4 YEARS OR MORE	513901	LICENSED PRACTICAL/VOCATIONAL NURSE TRAINING	01- UNDERGRADUATE CERTIFICATE	PASS		3.33	948	28444	PASS	8.78	948	10789	PASS	N/A	N/A	28444	25708		
01085	UNIVERSITY OF ARKANSAS AT MONTICELLO	MONTICELLO	AR	71656009	PUBLIC 4 YEARS OR MORE	520401	ADMINISTRATIVE ASSISTANT AND SECRETARIAL SERVICE - GENERAL	01- UNDERGRADUATE CERTIFICATE	PASS		3.16	500	16083	PASS	100	500	0	FAIL	N/A	N/A	16083	15218		
01089	ARKANSAS TECH UNIVERSITY	RUSSELLVILLE	AR	72801222	PUBLIC 4 YEARS OR MORE	513901	LICENSED PRACTICAL/VOCATIONAL NURSE TRAINING	01- UNDERGRADUATE CERTIFICATE	PASS		1.86	630	33801	PASS	3.88	630	16212	PASS	N/A	N/A	33801	32345		
01090	ARKANSAS STATE UNIVERSITY	JONESBORO	AR	72401009	PUBLIC 4 YEARS OR MORE	513901	LICENSED PRACTICAL/VOCATIONAL NURSE TRAINING	01- UNDERGRADUATE CERTIFICATE	PASS		0	0	28803	PASS	0	0	11150	PASS	N/A	N/A	28803	27373		
01091	ARKANSAS STATE UNIVERSITY - BEBE	BEEBE	AR	72021100	PUBLIC 2 TO 3 YEARS	470605	DIESEL MECHANICS TECHNOLOGY/TECHNICIAN	01- UNDERGRADUATE CERTIFICATE	PASS		0	0	38245	PASS	0	0	20590	PASS	N/A	N/A	38245	36005		
01091	ARKANSAS STATE UNIVERSITY - BEBE	BEEBE	AR	72021100	PUBLIC 2 TO 3 YEARS	513901	LICENSED PRACTICAL/VOCATIONAL NURSE TRAINING	01- UNDERGRADUATE CERTIFICATE	PASS		1.49	534	15725	PASS	2.95	534	18070	PASS	N/A	N/A	15725	15725		
01104	PHILLIPS COMMUNITY COLLEGE OF THE UNIVERSITY OF ARKANSAS	HELena	AR	72342000	PUBLIC 2 TO 3 YEARS	120401	COSMETOLOGY/COSMETOLOGIST, GENERAL	01- UNDERGRADUATE CERTIFICATE	PASS		0	0	15359	PASS	0	0	PASS	N/A	N/A	N/A	N/A	15359	13723	
01104	PHILLIPS COMMUNITY COLLEGE OF THE UNIVERSITY OF ARKANSAS	HELena	AR	72342000	PUBLIC 2 TO 3 YEARS	120709	CHILD CARE PROVIDER/ASSISTANT	01- UNDERGRADUATE CERTIFICATE	PASS		0	0	14235	PASS	0	0	0	PASS	N/A	N/A	N/A	N/A	12754	1235
01104	PHILLIPS COMMUNITY COLLEGE OF THE UNIVERSITY OF ARKANSAS	HELena	AR	72342000	PUBLIC 2 TO 3 YEARS	310707	HEALTH INFORMATION/MEDICAL RECORDS TECHNOLOGY/TECHNICIAN	01- UNDERGRADUATE CERTIFICATE	PASS		0.09	15	15021	PASS	100	15	0	FAIL	N/A	N/A	N/A	N/A	14731	15221
01104	PHILLIPS COMMUNITY COLLEGE OF THE UNIVERSITY OF ARKANSAS	HELena	AR	72342000	PUBLIC 2 TO 3 YEARS	511009	PHLEBOTOMY TECHNICIAN/PHLEBOTOMIST	01- UNDERGRADUATE CERTIFICATE	PASS		0	0	16510	PASS	0	0	0	PASS	N/A	N/A	N/A	N/A	16510	13665
01110	UNIVERSITY OF ARKANSAS AT FORT SMITH	FORT SMITH	AR	72047397	PUBLIC 4 YEARS OR MORE	513901	LICENSED PRACTICAL/VOCATIONAL NURSE TRAINING	01- UNDERGRADUATE CERTIFICATE	PASS		0.81	295	36337	PASS	1.57	295	18662	PASS	N/A	N/A	N/A	N/A	36337	34488
01123	BROOKS INSTITUTE	VENTURA	CA	93001103	PROPRIETARY 4 YEARS OR MORE	490400	PHOTOJOURNALISM	03- BACHELORS DEGREE	FAIL		14.31	315	21902	FAIL	73.81	315	21902	FAIL	17.5	3834	21902	FAIL	21902	20409
01123	BROOKS INSTITUTE	VENTURA	CA	93001103	PROPRIETARY 4 YEARS OR MORE	506002	CINEMATOGRAPHY AND FILM/VIDEO PRODUCTION	03- BACHELORS DEGREE	ZONE		8.79	2059	23408	ZONE	15.79	2059	5753	FAIL	12.64	2960	23408	FAIL	5145	2960
01123	BROOKS INSTITUTE	VENTURA	CA	93001103	PROPRIETARY 4 YEARS OR MORE	506005	PHOTOGRAPHY	03- BACHELORS DEGREE	ZONE		14.1	3102	23081	FAIL	60.81	3102	5426	FAIL	11.7	2702	23081	ZONE	49.77	2702
01123	BROOKS INSTITUTE	VENTURA	CA	93001103	PROPRIETARY 4 YEARS OR MORE	506005	PHOTOGRAPHY	03- MASTERS DEGREE	PASS		6.9	2268	32024	PASS	14.95	2268	15169	PASS	N/A	N/A	N/A	N/A	32024	31566
01134	SAN FRANCISCO STATE UNIVERSITY	SAN FRANCISCO	CA	94132170	PUBLIC 4 YEARS OR MORE	511009	PHLEBOTOMY TECHNICIAN/PHLEBOTOMIST	01- UNDERGRADUATE CERTIFICATE	PASS		2.32	11												

Institution Code (Six-Digit FPEID)	Institution Name	City	State	Zip	Institution Type	CIP Code	CIP Name	Credential Level	Official Postum/Fall	Appeal Status	Debt-to-Earnings Annual Rate	Debt-to-Earnings Annual Rate Numerator	Debt-to-Earnings Annual Rate Denominator	Debt-to-Earnings Annual Rate Pass/Fail/Zone	Debt-to-Earnings Discrepancy Income Rate	Debt-to-Earnings Discrepancy Income Rate Numerator	Debt-to-Earnings Discrepancy Income Rate Denominator	Debt-to-Earnings Transitional Rate	Debt-to-Earnings Transitional Rate Numerator	Debt-to-Earnings Transitional Rate Denominator	Debt-to-Earnings Transitional Rate Pass/Fail/Zone	Median Annual Earnings	Median Annual Earnings				
021286	SANTA MONICA COLLEGE	SANTA MONICA	CA	904051644	PUBLIC 4 YEARS OR MORE	120401	COSMETOLOGY/COSMETOLOGIST, GENERAL.	01 - UNDERGRADUATE CERTIFICATE	PASS	0	0	15367	PASS	0	0	0	PASS	N/A	N/A	N/A	N/A	N/A	15367	6			
021286	SANTA MONICA COLLEGE	SANTA MONICA	CA	904051644	PUBLIC 4 YEARS OR MORE	120402	COMMERCIAL AND ADVERTISING ART.	01 - UNDERGRADUATE CERTIFICATE	PASS	0	0	10988	PASS	0	0	13333	PASS	N/A	N/A	N/A	N/A	N/A	10988	25			
021292	SOLANO COMMUNITY COLLEGE	FAIRFIELD	CA	945411937	PUBLIC 2 TO 3 YEARS	120401	COSMETOLOGY/COSMETOLOGIST, GENERAL.	01 - UNDERGRADUATE CERTIFICATE	PASS	0	0	14078	PASS	0	0	0	PASS	N/A	N/A	N/A	N/A	N/A	15050	16			
021308	REDELFY COLLEGE	REDELFY	CA	918542099	PUBLIC 2 TO 3 YEARS	180709	CHILD CARE PROVIDER/ASSISTANT.	01 - UNDERGRADUATE CERTIFICATE	PASS	0	0	12862	PASS	0	0	0	PASS	N/A	N/A	N/A	N/A	N/A	12862	11			
021308	REDELFY COLLEGE	REDELFY	CA	918542099	PUBLIC 2 TO 3 YEARS	180709	AUTOMOTIVE/AUTOMOTIVE MECHANICS TECHNOLOGY/TECHNICIAN.	01 - UNDERGRADUATE CERTIFICATE	PASS	0	0	20803	PASS	0	0	3147	PASS	N/A	N/A	N/A	N/A	N/A	20803	15			
021308	REDELFY COLLEGE	REDELFY	CA	918542099	PUBLIC 2 TO 3 YEARS	480201	MACHINE TOOL TECHNOLOGY/MACHINIST.	01 - UNDERGRADUATE CERTIFICATE	PASS	0	0	34059	PASS	0	0	16404	PASS	N/A	N/A	N/A	N/A	N/A	27932	34			
021308	REDELFY COLLEGE	REDELFY	CA	918542099	PUBLIC 2 TO 3 YEARS	510001	DENTAL ASSISTING/ASSISTANT.	01 - UNDERGRADUATE CERTIFICATE	PASS	0	0	16340	PASS	0	0	0	PASS	N/A	N/A	N/A	N/A	N/A	15167	16			
021308	REDELFY COLLEGE	REDELFY	CA	918542099	PUBLIC 2 TO 3 YEARS	120401	ADMINISTRATIVE ASSISTANT AND SECRETARIAL SCIENCE, GENERAL.	01 - UNDERGRADUATE CERTIFICATE	PASS	0	0	11396	PASS	0	0	0	PASS	N/A	N/A	N/A	N/A	N/A	11360	8			
021313	UNIVERSITY OF CALIFORNIA, DAVIS	DAVIS	CA	956168508	PUBLIC 4 YEARS OR MORE PRIVATE, NOT FOR PROFIT	110805	FAMILY PRACTICE NURSE/NURSING.	04 - POST BACCALAUREATE CERTIFICATE	PASS	1.12	3590	144783	PASS	3.69	3590	67236	PASS	N/A	N/A	N/A	N/A	N/A	112651	61			
021328	UNIVERSITY OF SOUTHERN CALIFORNIA	LOS ANGELES	CA	908080001	PUBLIC 4 YEARS OR MORE	500313	MUSIC TECHNOLOGY.	08 - GRADUATE CERTIFICATE	FAIL	22.56	5593	24781	FAIL	78.48	5593	7126	FAIL	N/A	N/A	N/A	N/A	N/A	12761	22			
021335	VICTOR VALLEY COMMUNITY COLLEGE	VICTORVILLE	CA	923955850	PUBLIC 2 TO 3 YEARS	470004	AUTOMOTIVE/AUTOMOTIVE MECHANICS TECHNOLOGY/TECHNICIAN.	01 - UNDERGRADUATE CERTIFICATE	PASS	0.78	120	15289	PASS	100	120	0	FAIL	N/A	N/A	N/A	N/A	N/A	15289	14			
021335	VICTOR VALLEY COMMUNITY COLLEGE	VICTORVILLE	CA	923955850	PUBLIC 2 TO 3 YEARS	510001	REGISTERED NURSING/REGISTRED NURSE.	01 - UNDERGRADUATE CERTIFICATE	PASS	0	0	77242	PASS	0	0	59587	PASS	N/A	N/A	N/A	N/A	N/A	74147	77			
021346	AMARAPAH COMMUNITY COLLEGE	LITTLETON	CO	801609002	PUBLIC 2 TO 3 YEARS	480207	CRIMINAL JUSTICE/POLICE SCIENCE.	01 - UNDERGRADUATE CERTIFICATE	PASS	1.34	655	48051	PASS	2.11	655	30936	PASS	N/A	N/A	N/A	N/A	N/A	47297	48			
021355	JAMAR COMMUNITY COLLEGE	JAMAR	CO	805523999	PUBLIC 2 TO 3 YEARS	120401	COSMETOLOGY/COSMETOLOGIST, GENERAL.	01 - UNDERGRADUATE CERTIFICATE	PASS	9.83	979	9955	ZONE	100	979	0	FAIL	0.52	52	9950	PASS	100	52	FAIL	9950	1	
021361	NORTHEASTERN JUNIOR COLLEGE	STURLING	CO	807512399	PUBLIC 2 TO 3 YEARS	120401	COSMETOLOGY/COSMETOLOGIST, GENERAL.	01 - UNDERGRADUATE CERTIFICATE	PASS	10.56	1288	12318	ZONE	100	1288	0	FAIL	7.35	897	12188	PASS	100	897	0	FAIL	12188	1
021362	OTERO JUNIOR COLLEGE	LA JUINTA	CO	815051346	PUBLIC 2 TO 3 YEARS	120401	COSMETOLOGY/COSMETOLOGIST, GENERAL.	01 - UNDERGRADUATE CERTIFICATE	PASS	6.08	759	12475	PASS	100	759	0	FAIL	N/A	N/A	N/A	N/A	N/A	11314	12			
021362	OTERO JUNIOR COLLEGE	LA JUINTA	CO	815051346	PUBLIC 2 TO 3 YEARS	480207	CRIMINAL JUSTICE/POLICE SCIENCE.	01 - UNDERGRADUATE CERTIFICATE	PASS	2.32	897	38673	PASS	4.27	897	20882	PASS	N/A	N/A	N/A	N/A	N/A	38247	38			

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001475	DAYTONA STATE COLLEGE	DAYTONA BEACH	FL	321142800	PUBLIC 4 YEARS OR MORE	131051	MASSAGE THERAPY/THERAPEUTIC MASSAGE.	01- UNDERGRADUATE CERTIFICATE	PASS		1.73	301	17549	PASS	100	301	0	FAIL	N/A	N/A	N/A	N/A	27549	16389
001475	DAYTONA STATE COLLEGE	DAYTONA BEACH	FL	321142800	PUBLIC 4 YEARS OR MORE	131061	LICENSED PRACTICAL/VOCATIONAL NURSE TRAINING.	01- UNDERGRADUATE CERTIFICATE	PASS		1.1	421	38233	PASS	2.04	421	20578	PASS	N/A	N/A	N/A	N/A	37411	38233
001484	FLORIDA STATE COLLEGE AT JACKSONVILLE	JACKSONVILLE	FL	322024030	PUBLIC 4 YEARS OR MORE	220401	COSMETOLOGY/COSMETOLOGIST, GENERAL	01- UNDERGRADUATE CERTIFICATE	PASS		2.48	387	15562	PASS	100	387	0	FAIL	N/A	N/A	N/A	N/A	15562	13697
001484	FLORIDA STATE COLLEGE AT JACKSONVILLE	JACKSONVILLE	FL	322024030	PUBLIC 4 YEARS OR MORE	131061	HEATING, AIR CONDITIONING, VENTILATION AND REFRIGERATION MAINTENANCE TECHNOLOGY/TECHNICIAN.	01- UNDERGRADUATE CERTIFICATE	PASS		1.41	241	17383	PASS	100	241	0	FAIL	N/A	N/A	N/A	N/A	17383	17378
001484	FLORIDA STATE COLLEGE AT JACKSONVILLE	JACKSONVILLE	FL	322024030	PUBLIC 4 YEARS OR MORE	470607	AIRFRAME MECHANICS AND AIRCRAFT MAINTENANCE TECHNOLOGY/TECHNICIAN.	01- UNDERGRADUATE CERTIFICATE	PASS		1.52	581	38384	PASS	2.83	581	20529	PASS	N/A	N/A	N/A	N/A	38720	38184
001484	FLORIDA STATE COLLEGE AT JACKSONVILLE	JACKSONVILLE	FL	322024030	PUBLIC 4 YEARS OR MORE	470608	AIRCRAFT POWERPLANT TECHNOLOGY/TECHNICIAN.	01- UNDERGRADUATE CERTIFICATE	PASS		1.7	621	36472	PASS	3.3	621	18817	PASS	N/A	N/A	N/A	N/A	36472	34611
001484	FLORIDA STATE COLLEGE AT JACKSONVILLE	JACKSONVILLE	FL	322024030	PUBLIC 4 YEARS OR MORE	110009	UNIGROSS LOGICAL TECHNOLOGY/TECHNOLOGIST.	01- UNDERGRADUATE CERTIFICATE	PASS		1.36	400	29188	PASS	3.04	400	11731	PASS	N/A	N/A	N/A	N/A	29188	29888
001484	FLORIDA STATE COLLEGE AT JACKSONVILLE	JACKSONVILLE	FL	322024030	PUBLIC 4 YEARS OR MORE	131051	MASSAGE THERAPY/THERAPEUTIC MASSAGE.	01- UNDERGRADUATE CERTIFICATE	PASS		1.3	223	17035	PASS	100	223	0	FAIL	N/A	N/A	N/A	N/A	17035	17398
001484	FLORIDA STATE COLLEGE AT JACKSONVILLE	JACKSONVILLE	FL	322024030	PUBLIC 4 YEARS OR MORE	131061	LICENSED PRACTICAL/VOCATIONAL NURSE TRAINING.	01- UNDERGRADUATE CERTIFICATE	PASS		0.86	310	35984	PASS	1.69	310	18289	PASS	N/A	N/A	N/A	N/A	34398	37504
001490	GULF COAST STATE COLLEGE	PANAMA CITY	FL	324011058	PUBLIC 4 YEARS OR MORE	131061	DENTAL ASSISTING/ASSISTANT.	01- UNDERGRADUATE CERTIFICATE	PASS		0	0	20582	PASS	0	0	8927	PASS	N/A	N/A	N/A	N/A	24708	20582
001490	GULF COAST STATE COLLEGE	PANAMA CITY	FL	324011058	PUBLIC 4 YEARS OR MORE	131061	LICENSED PRACTICAL/VOCATIONAL NURSE TRAINING.	01- UNDERGRADUATE CERTIFICATE	PASS		0	0	29907	PASS	0	0	12253	PASS	N/A	N/A	N/A	N/A	28826	29907
001493	INDIAN RIVER STATE COLLEGE	FORT PIERCE	FL	348815536	PUBLIC 4 YEARS OR MORE	220401	COSMETOLOGY/COSMETOLOGIST, GENERAL	01- UNDERGRADUATE CERTIFICATE	PASS		2.05	250	12105	PASS	100	250	0	FAIL	N/A	N/A	N/A	N/A	12105	11524
001493	INDIAN RIVER STATE COLLEGE	FORT PIERCE	FL	348815536	PUBLIC 4 YEARS OR MORE	430107	CRIMINAL JUSTICE/POLICE SCIENCE.	01- UNDERGRADUATE CERTIFICATE	PASS		0	0	39955	PASS	0	0	21949	PASS	N/A	N/A	N/A	N/A	35962	39955
001493	INDIAN RIVER STATE COLLEGE	FORT PIERCE	FL	348815536	PUBLIC 4 YEARS OR MORE	110009	MEDICAL/CLINICAL ASSISTANT.	01- UNDERGRADUATE CERTIFICATE	PASS		1.5	370	24036	PASS	5.33	370	6941	PASS	N/A	N/A	N/A	N/A	21484	24036
001493	INDIAN RIVER STATE COLLEGE	FORT PIERCE	FL	348815536	PUBLIC 4 YEARS OR MORE	131061	LICENSED PRACTICAL/VOCATIONAL NURSE TRAINING.	01- UNDERGRADUATE CERTIFICATE	PASS		0	0	40023	PASS	0	0	22368	PASS	N/A	N/A	N/A	N/A	40023	35040
001493	INDIAN RIVER STATE COLLEGE	FORT PIERCE	FL	348815536	PUBLIC 4 YEARS OR MORE	220701	ENTREPRENEURSHIP/ENTREPRENEURIAL STUDIES.	01- UNDERGRADUATE CERTIFICATE	PASS		0	0	25190	PASS	0	0	7535	PASS	N/A	N/A	N/A	N/A	25190	24768
001493	INDIAN RIVER STATE COLLEGE	FORT PIERCE	FL	348815536	PUBLIC 4 YEARS OR MORE	121401	MARKETING/MARKETING MANAGEMENT, GENERAL.	01- UNDERGRADUATE CERTIFICATE	PASS		0	0	21887	PASS	0									

Institution Designation (DSIG ORID)	Institution Name	City	State	Zip	Institution Type	CIP Code	CP Name	Credential Level	Official Program Pwd/Date Full	Appeal Status	Debt-to-Earnings Ratio Annual Rate Numerator	Debt-to-Earnings Ratio Annual Rate Denominator	Debt-to-Earnings Ratio Post/Fall/Zone	Debt-to-Earnings Ratio Discretionary Income Rate Numerator	Debt-to-Earnings Ratio Discretionary Income Rate Denominator	Debt-to-Earnings Ratio Transitional Income Rate Numerator	Debt-to-Earnings Ratio Transitional Income Rate Denominator	Debt-to-Earnings Ratio Transitional Income Rate Numerator	Debt-to-Earnings Ratio Transitional Income Rate Denominator	Debt-to-Earnings Ratio Transitional Income Rate Numerator	Debt-to-Earnings Ratio Transitional Income Rate Denominator	Mean Annual Earnings	Median Annual Earnings	
001510	SANTA FE COLLEGE	GAINESVILLE	FL	32606200	PUBLIC 4 YEARS OR MORE	131999	PRACTICAL NURSING, VOCATIONAL NURSING AND NURSING ASSISTANTS, OTHER.	04 - POST BACCALAUREATE CERTIFICATE	PASS	0	0	36782	PASS	0	0	19307	PASS	N/A	N/A	N/A	N/A	N/A	31827	30962
001520	SEMINOLE STATE COLLEGE OF FLORIDA	SANFORD	FL	32778350	PUBLIC 4 YEARS OR MORE	130027	CRIMINAL JUSTICE/POLICE SCIENCE.	01 - UNDERGRADUATE CERTIFICATE	PASS	1.72	558	32339	PASS	3.8	558	14684	PASS	N/A	N/A	N/A	N/A	N/A	32339	31827
001520	SEMINOLE STATE COLLEGE OF FLORIDA	SANFORD	FL	32776199	PUBLIC 4 YEARS OR MORE	131901	LICENSED PRACTICAL/VOCATIONAL NURSE TRAINING	01 - UNDERGRADUATE CERTIFICATE	PASS	2.32	752	32406	PASS	5.09	752	14751	PASS	N/A	N/A	N/A	N/A	N/A	32155	32406
001523	SAINT JOHN'S RIVER STATE COLLEGE	PALESTINE	FL	321773807	PUBLIC 4 YEARS OR MORE	430102	CONNECTIONS.	01 - UNDERGRADUATE CERTIFICATE	PASS	0.66	237	31782	PASS	1.3	217	18227	PASS	N/A	N/A	N/A	N/A	N/A	34985	35782
001523	SAINT JOHN'S RIVER STATE COLLEGE	PALESTINE	FL	321773807	PUBLIC 4 YEARS OR MORE	430107	CRIMINAL JUSTICE/POLICE SCIENCE.	01 - UNDERGRADUATE CERTIFICATE	PASS	1.01	354	34998	PASS	2.04	354	17843	PASS	N/A	N/A	N/A	N/A	N/A	34985	34800
001533	TALLAHASSEE COMMUNITY COLLEGE	TALLAHASSEE	FL	323042855	PUBLIC 2 TO 3 YEARS	430102	CONNECTIONS.	01 - UNDERGRADUATE CERTIFICATE	PASS	0.8	234	29200	PASS	2.02	234	11545	PASS	N/A	N/A	N/A	N/A	N/A	27463	29200
001533	TALLAHASSEE COMMUNITY COLLEGE	TALLAHASSEE	FL	323042855	PUBLIC 2 TO 3 YEARS	430107	CRIMINAL JUSTICE/POLICE SCIENCE.	01 - UNDERGRADUATE CERTIFICATE	PASS	0.87	330	37665	PASS	1.64	330	20055	PASS	N/A	N/A	N/A	N/A	N/A	19196	17665
001543	UNIVERSITY OF FLORIDA	GAINESVILLE	FL	326113150	PUBLIC 4 YEARS OR MORE	120401	DENTISTRY.	08 - GRADUATE CERTIFICATE	PASS	8.85	10040	111412	ZONE	10.48	10040	91573	PASS	N/A	N/A	N/A	N/A	N/A	116133	105131
001545	JACKSON STATE UNIVERSITY	ALBANY	GA	317573038	PUBLIC 4 YEARS OR MORE	110604	EMERGENCY MEDICAL TECHNOLOGY/TECHNICIAN (EMT PARAMEDICS).	01 - UNDERGRADUATE CERTIFICATE	PASS	0	0	34976	PASS	0	0	17321	PASS	N/A	N/A	N/A	N/A	N/A	33913	34976
001561	COLUMBUS STATE UNIVERSITY	COLUMBUS	GA	319075645	PUBLIC 4 YEARS OR MORE	430104	CRIMINAL JUSTICE/SAFETY STUDIES.	01 - UNDERGRADUATE CERTIFICATE	PASS	0	0	40227	PASS	0	0	22572	PASS	N/A	N/A	N/A	N/A	N/A	40227	40273
001581	MIDDLE GEORGIA STATE UNIVERSITY	MACON	GA	312055445	PUBLIC 4 YEARS OR MORE	150801	AERONAUTICAL/AEROSPACE ENGINEERING TECHNOLOGY/TECHNICIAN.	01 - UNDERGRADUATE CERTIFICATE	PASS	0	0	39105	PASS	0	0	21450	PASS	N/A	N/A	N/A	N/A	N/A	39105	39078
001581	MIDDLE GEORGIA STATE UNIVERSITY	MACON	GA	312055445	PUBLIC 4 YEARS OR MORE	170609	KITCHENS MAINTENANCE TECHNOLOGY/TECHNICIAN.	01 - UNDERGRADUATE CERTIFICATE	PASS	0	0	41575	PASS	0	0	23920	PASS	N/A	N/A	N/A	N/A	N/A	40833	41575
001610	UNIVERSITY OF HAWAII AT MANOA	HONOLULU	HI	968222199	PUBLIC 4 YEARS OR MORE	131001	SPECIAL EDUCATION AND TEACHING, GENERAL.	04 - POST BACCALAUREATE CERTIFICATE	PASS	3.04	1556	52059	PASS	4.65	2550	33404	PASS	N/A	N/A	N/A	N/A	N/A	45024	52059
001610	UNIVERSITY OF HAWAII AT MANOA	HONOLULU	HI	968222199	PUBLIC 4 YEARS OR MORE	131002	SECONDARY EDUCATION AND TEACHING.	04 - POST BACCALAUREATE CERTIFICATE	PASS	3.52	1276	49018	PASS	5.5	1276	31363	PASS	N/A	N/A	N/A	N/A	N/A	46347	49018
001614	KAUAI COMMUNITY COLLEGE	KAHUIE	HI	967691991	PUBLIC 2 TO 3 YEARS	131901	LICENSED PRACTICAL/VOCATIONAL NURSE TRAINING	01 - UNDERGRADUATE CERTIFICATE	PASS	0.77	426	55271	PASS	1.13	426	27656	PASS	N/A	N/A	N/A	N/A	N/A	53800	55271
001615	UNIVERSITY OF HAWAII MAUI COLLEGE	LAHOLE	HI	967312644	PUBLIC 4 YEARS OR MORE	131901	LICENSED PRACTICAL/VOCATIONAL NURSE TRAINING	01 - UNDERGRADUATE CERTIFICATE	PASS	1.41	643	45347	PASS	2.32	643	27000	PASS	N/A	N/A	N/A	N/A	N/A	45347	42983
001619	COLLEGE OF SOUTHERN OHIO	TWIN FALLS	OH	431033138	PUBLIC 4 YEARS OR MORE	131901	LICENSED PRACTICAL/VOCATIONAL NURSE TRAINING	01 - UNDERGRADUATE CERTIFICATE	PASS	2.14	814	29887	P											

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001767	SOUTHEASTERN ILLINOIS COLLEGE	HARRISBURG, IL	IL	629648025	PUBLIC 2 TO 3 YEARS	513901	LICENSED PRACTICAL/VOCATIONAL NURSE TRAINING.	R1 - UNDERGRADUATE CERTIFICATE	PASS		0	0	38453	PASS	0	20788	PASS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	\$6716	\$8453
001769	SOUTH SUBURBAN COLLEGE OF COOK COUNTY	SOUTH HOLLAND, IL	IL	624739978	PUBLIC 2 TO 3 YEARS	510004	EMERGENCY MEDICAL TECHNOLOGY/TECHNICIAN (EMT PARAMEDIC).	R1 - UNDERGRADUATE CERTIFICATE	PASS		0	0	73074	PASS	0	55473	PASS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	\$3074	\$4891
001779	INDIANA EASTERN COMMUNITY COLLEGES - WABASH VALLEY COLLEGE	MOUNT CARMEL, IN	IN	626863699	PUBLIC 2 TO 3 YEARS	513901	LICENSED PRACTICAL/VOCATIONAL NURSE TRAINING.	R1 - UNDERGRADUATE CERTIFICATE	PASS		0	0	40386	PASS	0	22731	PASS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	\$9315	\$10386
001783	JEROMEHAM COLLEGE OF MORTUARY SCIENCE	WHEELING, IN	IN	460902846	PROPRIETARY 2 TO 3 YEARS	120001	FUNERAL SERVICE AND MORTUARY SCIENCE, GENERAL.	R2 - ASSOCIATES DEGREE	PASS		4.97	1795	30304	PASS	9.72	1795	18449	PASS	N/A	N/A	N/A	N/A	N/A	N/A	\$7321	\$9104
001813	INDIANA UNIVERSITY - PURDUE UNIVERSITY INDIANAPOLIS	INDIANAPOLIS, IN	IN	46022896	PUBLIC 4 YEARS OR MORE	119999	COMPUTER AND INFORMATION SCIENCES AND SUPPORT SERVICES, OTHER.	R1 - UNDERGRADUATE CERTIFICATE	PASS		4.24	1678	39568	PASS	7.65	1678	21933	PASS	N/A	N/A	N/A	N/A	N/A	N/A	\$8275	\$9168
001813	INDIANA UNIVERSITY - PURDUE UNIVERSITY INDIANAPOLIS	INDIANAPOLIS, IN	IN	46022896	PUBLIC 4 YEARS OR MORE	220002	LEGAL ASSISTANT/PARALEGAL.	R1 - UNDERGRADUATE CERTIFICATE	PASS		3.19	1221	38728	PASS	5.92	1221	20603	PASS	N/A	N/A	N/A	N/A	N/A	N/A	\$8256	\$7914
001813	INDIANA UNIVERSITY - PURDUE UNIVERSITY INDIANAPOLIS	INDIANAPOLIS, IN	IN	46022896	PUBLIC 4 YEARS OR MORE	110507	PHYSICAL FITNESS TECHNICIAN.	R1 - UNDERGRADUATE CERTIFICATE	PASS		1.57	465	29325	PASS	3.96	463	11670	PASS	N/A	N/A	N/A	N/A	N/A	N/A	\$2765	\$9325
001813	INDIANA UNIVERSITY - PURDUE UNIVERSITY INDIANAPOLIS	INDIANAPOLIS, IN	IN	46022896	PUBLIC 4 YEARS OR MORE	400000	HUMAN SERVICES, GENERAL.	R1 - UNDERGRADUATE CERTIFICATE	PASS		3.2	1035	32273	PASS	7.08	1035	14638	PASS	N/A	N/A	N/A	N/A	N/A	N/A	\$9108	\$2273
001813	INDIANA UNIVERSITY - PURDUE UNIVERSITY INDIANAPOLIS	INDIANAPOLIS, IN	IN	46022896	PUBLIC 4 YEARS OR MORE	510001	GENERAL ASSISTING/ASSISTANT.	R1 - UNDERGRADUATE CERTIFICATE	PASS		3.15	870	27613	PASS	8.73	870	9929	PASS	N/A	N/A	N/A	N/A	N/A	N/A	\$6866	\$7263
001813	INDIANA UNIVERSITY - PURDUE UNIVERSITY INDIANAPOLIS	INDIANAPOLIS, IN	IN	46022896	PUBLIC 4 YEARS OR MORE	510008	HISTOLOGIC TECHNICIAN.	R1 - UNDERGRADUATE CERTIFICATE	PASS		1.86	835	44832	PASS	3.07	835	27527	PASS	N/A	N/A	N/A	N/A	N/A	N/A	\$4887	\$4832
001813	INDIANA UNIVERSITY - PURDUE UNIVERSITY INDIANAPOLIS	INDIANAPOLIS, IN	IN	46022896	PUBLIC 4 YEARS OR MORE	520001	BUSINESS/COMMERCIAL, GENERAL.	R1 - UNDERGRADUATE CERTIFICATE	PASS		4.32	1455	33637	PASS	9.1	1455	15982	PASS	N/A	N/A	N/A	N/A	N/A	N/A	\$2874	\$3637
001813	INDIANA UNIVERSITY - PURDUE UNIVERSITY INDIANAPOLIS	INDIANAPOLIS, IN	IN	46022896	PUBLIC 4 YEARS OR MORE	520007	MEETING AND EVENT PLANNING.	R1 - UNDERGRADUATE CERTIFICATE	PASS		1.97	622	31448	PASS	4.5	622	13793	PASS	N/A	N/A	N/A	N/A	N/A	N/A	\$1025	\$1448
001813	INDIANA UNIVERSITY - PURDUE UNIVERSITY INDIANAPOLIS	INDIANAPOLIS, IN	IN	46022896	PUBLIC 4 YEARS OR MORE	510001	HUMAN RESOURCES MANAGEMENT/PERSONNEL ADMINISTRATION, GENERAL.	R1 - UNDERGRADUATE CERTIFICATE	PASS		2.02	909	44965	PASS	3.32	909	27311	PASS	N/A	N/A	N/A	N/A	N/A	N/A	\$4966	\$4217
001815	INDIANA UNIVERSITY - NORTHWEST	GARY, IN	IN	464681157	PUBLIC 4 YEARS OR MORE	464641	PUBLIC ADMINISTRATION.	R2 - GRADUATE CERTIFICATE	PASS		2.26	771	34995	PASS	4.68	771	16440	PASS	N/A	N/A	N/A	N/A	N/A	N/A	\$4969	\$3064
001815	INDIANA UNIVERSITY - NORTHWEST	GARY, IN	IN	464681157	PUBLIC 4 YEARS OR MORE	510001	PUBLIC ADMINISTRATION.	R1 - UNDERGRADUATE CERTIFICATE	PASS		5.36	1157	21572	PASS	28.53	1157	3917	ZONE	N/A	N/A	N/A	N/A	N/A	N/A	\$1572	\$1951
001817	INDIANA UNIVERSITY - SOUTHEAST	NEW ALBANY, IN	IN	471506405	PUBLIC 4 YEARS OR MORE	100113	MEDICAL INSURANCE CODING/SPECIALIST/CODER.	R1 -																		

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019121	HIGHLAND COMMUNITY COLLEGE	HIGHLAND	KS	660354062	PUBLIC 2 TO 3 YEARS	513901	LICENSED PRACTICAL/VOCATIONAL NURSE TRAINING	01 - UNDERGRADUATE CERTIFICATE	PASS		2.43	874	33588	PASS	4.79	874	18233	PASS	N/A	N/A	N/A	N/A	N/A	35888	35376
019123	HUTCHINSON COMMUNITY COLLEGE	HUTCHINSON	KS	675015994	PUBLIC 2 TO 3 YEARS	513901	LICENSED PRACTICAL/VOCATIONAL NURSE TRAINING	01 - UNDERGRADUATE CERTIFICATE	PASS		1.75	615	34957	PASS	3.55	615	17302	PASS	N/A	N/A	N/A	N/A	N/A	31813	34957
019124	INDEPENDENCE COMMUNITY COLLEGE	INDEPENDENCE	KS	673010708	PUBLIC 2 TO 3 YEARS	120401	COSMETOLOGY/COSMETOLOGIST, GENERAL	01 - UNDERGRADUATE CERTIFICATE	PASS		0	0	10986	PASS	0	0	0	PASS	N/A	N/A	N/A	N/A	N/A	10542	10986
019125	KANSAS CITY KANSAS COMMUNITY COLLEGE	KANSAS CITY	KS	661129978	PUBLIC 2 TO 3 YEARS	470201	HEATING, AIR CONDITIONING, VENTILATION AND REFRIGERATION MAINTENANCE TECHNOLOGY/TECHNICIAN	01 - UNDERGRADUATE CERTIFICATE	PASS		0	0	23550	PASS	0	0	3895	PASS	N/A	N/A	N/A	N/A	N/A	21387	21550
019125	KANSAS CITY KANSAS COMMUNITY COLLEGE	KANSAS CITY	KS	661129978	PUBLIC 2 TO 3 YEARS	470604	AUTOMOBILE/AUTOMOTIVE MECHANICS TECHNOLOGY/TECHNICIAN	01 - UNDERGRADUATE CERTIFICATE	PASS		0	0	20939	PASS	0	0	2984	PASS	N/A	N/A	N/A	N/A	N/A	20283	20939
019125	KANSAS CITY KANSAS COMMUNITY COLLEGE	KANSAS CITY	KS	661129978	PUBLIC 2 TO 3 YEARS	513901	LICENSED PRACTICAL/VOCATIONAL NURSE TRAINING	01 - UNDERGRADUATE CERTIFICATE	PASS		0	0	36244	PASS	0	0	18089	PASS	N/A	N/A	N/A	N/A	N/A	36056	36244
019136	NEDCHO COUNTY COMMUNITY COLLEGE	CHAMUTE	KS	667202009	PUBLIC 2 TO 3 YEARS	513901	LICENSED PRACTICAL/VOCATIONAL NURSE TRAINING	01 - UNDERGRADUATE CERTIFICATE	PASS		1.8	795	44127	PASS	3	795	26472	PASS	N/A	N/A	N/A	N/A	N/A	42862	44127
019138	PRATT COMMUNITY COLLEGE	PRATT	KS	671484832	PUBLIC 2 TO 3 YEARS	513901	LICENSED PRACTICAL/VOCATIONAL NURSE TRAINING	01 - UNDERGRADUATE CERTIFICATE	PASS		1.12	493	43173	PASS	1.89	493	26052	PASS	N/A	N/A	N/A	N/A	N/A	42153	43173
019149	WASHBURN UNIVERSITY - TOPEKA	TOPEKA	KS	666211110	PUBLIC 4 YEARS OR MORE	470201	HEATING, AIR CONDITIONING, VENTILATION AND REFRIGERATION MAINTENANCE TECHNOLOGY/TECHNICIAN	01 - UNDERGRADUATE CERTIFICATE	PASS		2.06	623	31645	PASS	4.66	623	12990	PASS	N/A	N/A	N/A	N/A	N/A	29678	31645
019149	WASHBURN UNIVERSITY - TOPEKA	TOPEKA	KS	666211110	PUBLIC 4 YEARS OR MORE	470604	AUTOMOBILE/AUTOMOTIVE MECHANICS TECHNOLOGY/TECHNICIAN	01 - UNDERGRADUATE CERTIFICATE	PASS		2.83	621	21294	PASS	14.51	621	4279	PASS	N/A	N/A	N/A	N/A	N/A	21678	21294
019149	WASHBURN UNIVERSITY - TOPEKA	TOPEKA	KS	666211110	PUBLIC 4 YEARS OR MORE	510907	MEDICAL RADIOLOGIC TECHNOLOGY/SCIENCE - ADDITION THERAPIST	01 - UNDERGRADUATE CERTIFICATE	PASS		1.79	985	54912	PASS	2.64	985	37257	PASS	N/A	N/A	N/A	N/A	N/A	54181	54912
019149	WASHBURN UNIVERSITY - TOPEKA	TOPEKA	KS	666211110	PUBLIC 4 YEARS OR MORE	510910	DIAGNOSTIC MEDICAL SONOGRAPHY/SONOGRAPHY AND ULTRASOUND TECHNOLOGY	01 - UNDERGRADUATE CERTIFICATE	PASS		1.35	707	51991	PASS	2.05	707	14336	PASS	N/A	N/A	N/A	N/A	N/A	50421	51991
019149	WASHBURN UNIVERSITY - TOPEKA	TOPEKA	KS	666211110	PUBLIC 4 YEARS OR MORE	513901	LICENSED PRACTICAL/VOCATIONAL NURSE TRAINING	01 - UNDERGRADUATE CERTIFICATE	PASS		1.64	594	36079	PASS	3.22	594	18424	PASS	N/A	N/A	N/A	N/A	N/A	36079	35496
019179	WEST KENTUCKY COMMUNITY AND TECHNICAL COLLEGE	PAIDUCAH	KY	420077380	PUBLIC 2 TO 3 YEARS	460302	ELECTRICIAN	01 - UNDERGRADUATE CERTIFICATE	PASS		0	0	31645	PASS	0	0	12885	PASS	N/A	N/A	NOI	N/A	N/A	31645	27045
019179	WEST KENTUCKY COMMUNITY AND TECHNICAL COLLEGE	PAIDUCAH	KY	420077380	PUBLIC 2 TO 3 YEARS	510602	DENTAL HYGIENE/HYGIENIST	01 - UNDERGRADUATE CERTIFICATE	PASS		1.64	414	23130	PASS	5.55	414	4147	PASS	N/A	N/A	N/A	N/A	N/A	24140	23130
019179	WEST KENTUCKY COMMUNITY AND TECHNICAL COLLEGE	PAIDUCAH	KY	420077380	PUBLIC 2 TO 3 YEARS	513901	LICENSED PRACTICAL/VOCATIONAL NURSE TRAINING	01 - UNDERGRADUATE CERTIFICATE	PASS																

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020408	HOLMES COMMUNITY COLLEGE	GOODMAN	MS	39670000	PUBLIC 2 TO 3 YEARS	513901	LICENSED PRACTICAL/VOCATIONAL NURSE TRAINING	04 - UNDERGRADUATE CERTIFICATE	PASS	0	0	29347	PASS	0	0	11692	PASS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	29347	2889	
020410	TAWAMBA COMMUNITY COLLEGE	FULTON	MS	385431099	PUBLIC 2 TO 3 YEARS	513901	LICENSED PRACTICAL/VOCATIONAL NURSE TRAINING	04 - UNDERGRADUATE CERTIFICATE	PASS	1.48	443	29732	PASS	3.66	443	12077	PASS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	29732	2836
020411	JONES COUNTY JUNIOR COLLEGE	ELLISVILLE	MS	394379999	PUBLIC 2 TO 3 YEARS	513901	LICENSED PRACTICAL/VOCATIONAL NURSE TRAINING	04 - UNDERGRADUATE CERTIFICATE	PASS	1.58	609	30705	PASS	4.66	609	13046	PASS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	29220	3070
020413	JONES COUNTY JUNIOR COLLEGE	ELLISVILLE	MS	394379999	PUBLIC 2 TO 3 YEARS	513902	NURSING ASSISTANT/AND PATIENT CARE ASSISTANT/AND	04 - UNDERGRADUATE CERTIFICATE	PASS	1.15	665	13904	PASS	100	160	0	FAIL	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	13904	1299
020413	MERIDIAN COMMUNITY COLLEGE	MIRIDIAN	MS	393575890	PUBLIC 2 TO 3 YEARS	120401	COSMETOLOGY/COSMETOLOGIST, GENERAL	04 - UNDERGRADUATE CERTIFICATE	PASS	0	0	12692	PASS	0	0	0	PASS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	12692	1269
020413	MERIDIAN COMMUNITY COLLEGE	MIRIDIAN	MS	393575890	PUBLIC 2 TO 3 YEARS	513901	LICENSED PRACTICAL/VOCATIONAL NURSE TRAINING	04 - UNDERGRADUATE CERTIFICATE	PASS	0	0	34915	PASS	0	0	17260	PASS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	11253	1491
020413	MERIDIAN COMMUNITY COLLEGE	MIRIDIAN	MS	393575890	PUBLIC 2 TO 3 YEARS	513902	NURSING ASSISTANT/AND PATIENT CARE ASSISTANT/AND	04 - UNDERGRADUATE CERTIFICATE	PASS	0	0	14396	PASS	0	0	0	PASS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	13508	1439
020416	MISSISSIPPI DELTA COMMUNITY COLLEGE	MOOREHEAD	MS	387100000	PUBLIC 2 TO 3 YEARS	480508	WELDING TECHNOLOGY/WELDER	04 - UNDERGRADUATE CERTIFICATE	PASS	0	0	21582	PASS	0	0	3927	PASS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	21582	2060
020417	MISSISSIPPI GULF COAST COMMUNITY COLLEGE	PERKINSTEON	MS	395730000	PUBLIC 2 TO 3 YEARS	460091	ELECTRICAL AND POWER TRANSMISSION INSTALLATION/INSTALLER, GENERAL	04 - UNDERGRADUATE CERTIFICATE	PASS	0.13	195	58423	PASS	0.47	195	40708	PASS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	58423	5485
020417	MISSISSIPPI GULF COAST COMMUNITY COLLEGE	PERKINSTEON	MS	395730000	PUBLIC 2 TO 3 YEARS	130810	EMERGENCY CARE ATTENDANT (EMT/AMBULANCE)	04 - UNDERGRADUATE CERTIFICATE	PASS	0.87	221	25229	PASS	2.91	221	7574	PASS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	25229	2281
020426	NORTHEAST MISSISSIPPI COMMUNITY COLLEGE	BOONEVILLE	MS	388291731	PUBLIC 2 TO 3 YEARS	513901	LICENSED PRACTICAL/VOCATIONAL NURSE TRAINING	04 - UNDERGRADUATE CERTIFICATE	PASS	1.8	529	29383	PASS	4.51	529	11728	PASS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	29383	2773	
020427	NORTHWEST MISSISSIPPI COMMUNITY COLLEGE	SENATORIA	MS	386681703	PUBLIC 2 TO 3 YEARS	120401	COSMETOLOGY/COSMETOLOGIST, GENERAL	04 - UNDERGRADUATE CERTIFICATE	PASS	0	0	12147	PASS	0	0	0	PASS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	12147	1062
020427	NORTHWEST MISSISSIPPI COMMUNITY COLLEGE	SENATORIA	MS	386681703	PUBLIC 2 TO 3 YEARS	476003	AUTOMOBILE/VEHICULE AND REPAIR TECHNOLOGY/TECHNICIAN	04 - UNDERGRADUATE CERTIFICATE	PASS	0	0	25514	PASS	0	0	7895	PASS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	25514	2400
020427	NORTHWEST MISSISSIPPI COMMUNITY COLLEGE	SENATORIA	MS	386681703	PUBLIC 2 TO 3 YEARS	480508	WELDING TECHNOLOGY/WELDER	04 - UNDERGRADUATE CERTIFICATE	PASS	0	0	23640	PASS	0	0	5899	PASS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	23640	2347
020427	NORTHWEST MISSISSIPPI COMMUNITY COLLEGE	SENATORIA	MS	386681703	PUBLIC 2 TO 3 YEARS	513901	LICENSED PRACTICAL/VOCATIONAL NURSE TRAINING	04 - UNDERGRADUATE CERTIFICATE	PASS	0	0	34713	PASS	0	0	17098	PASS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	32509	3471
020427	NORTHWEST MISSISSIPPI COMMUNITY COLLEGE	SENATORIA	MS	386681703	PUBLIC 2 TO 3 YEARS	513902	NURSING ASSISTANT/AND PATIENT CARE ASSISTANT/AND	04 - UNDERGRADUATE CERTIFICATE	PASS	0	0	14176	PASS														

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002705	COLLEGE OF SAINT ROSE	ALBANY	NY	12203-1490	PRIVATE, NOT-FOR-PROFIT 4 YEARS OR MORE	422805	SCHOOL PSYCHOLOGY	01 - UNDERGRADUATE CERTIFICATE	PASS	5.71	3046	53367	PASS	8.53	3048	35712	PASS	N/A	N/A	N/A	N/A	N/A	51078	5136
002722	FORDHAM UNIVERSITY	BRONX	NY	10458-5517	PRIVATE, NOT-FOR-PROFIT 4 YEARS OR MORE	422805	SCHOOL PSYCHOLOGY	01 - UNDERGRADUATE CERTIFICATE	PASS	8.91	5596	62795	ZONE	12.39	5596	45140	PASS	N/A	N/A	N/A	N/A	N/A	61230	6279
002732	HOFSTRA UNIVERSITY	HEMPHISTAD	NY	11549-0310	PRIVATE, NOT-FOR-PROFIT 4 YEARS OR MORE	220302	JLEGAL ASSISTANT/PARALEGAL	02 - UNDERGRADUATE CERTIFICATE	PASS	2.21	827	37417	PASS	4.18	827	19762	PASS	N/A	N/A	N/A	N/A	N/A	36085	3741
002732	HOFSTRA UNIVERSITY	HEMPHISTAD	NY	11549-0310	PRIVATE, NOT-FOR-PROFIT 4 YEARS OR MORE	530912	PHYSICIAN ASSISTANT	01 - UNDERGRADUATE CERTIFICATE	PASS	6.99	7993	144226	PASS	8.27	7993	96073	PASS	N/A	N/A	N/A	N/A	N/A	114228	10785
002751	LONG ISLAND UNIVERSITY	BROOKVILLE	NY	11548-1326	PRIVATE, NOT-FOR-PROFIT 4 YEARS OR MORE	130401	EDUCATIONAL LEADERSHIP AND ADMINISTRATION, GENERAL	04 - POST BACCALAUREATE CERTIFICATE	PASS	2.69	2497	91310	PASS	3.33	2417	73805	PASS	N/A	N/A	N/A	N/A	N/A	9131	9131
002759	MANHATTAN SCHOOL OF MUSIC	NEW YORK	NY	10027-6489	PRIVATE, NOT-FOR-PROFIT 4 YEARS OR MORE	500903	MUSIC PERFORMANCE, GENERAL	01 - POST BACCALAUREATE CERTIFICATE	ZONE	11.09	4310	32923	FAIL	28.22	4310	15208	ZONE	N/A	N/A	N/A	N/A	N/A	32923	2844
002759	MANHATTAN SCHOOL OF MUSIC	NEW YORK	NY	10027-6489	PRIVATE, NOT-FOR-PROFIT 4 YEARS OR MORE	500903	MUSIC PERFORMANCE, GENERAL	01 - UNDERGRADUATE CERTIFICATE	PASS	4.74	1163	12923	PASS	10.23	1543	15208	PASS	N/A	N/A	N/A	N/A	N/A	12923	2844
002765	MARRIOTT COLLEGE	POUGHKEEPSIE	NY	12651-1837	PRIVATE, NOT-FOR-PROFIT 4 YEARS OR MORE	220302	JLEGAL ASSISTANT/PARALEGAL	01 - UNDERGRADUATE CERTIFICATE	PASS	3.48	1311	37570	PASS	6.58	1311	19915	PASS	N/A	N/A	N/A	N/A	N/A	36722	3757
002785	NEW YORK UNIVERSITY	NEW YORK	NY	10012-1091	PRIVATE, NOT-FOR-PROFIT 4 YEARS OR MORE	510501	DENTAL CLINICAL SCIENCES, GENERAL	01 - UNDERGRADUATE CERTIFICATE	PASS	7.78	15800	202946	PASS	8.53	15800	185195	PASS	N/A	N/A	N/A	N/A	N/A	22048	10844
002785	NEW YORK UNIVERSITY	NEW YORK	NY	10012-1091	PRIVATE, NOT-FOR-PROFIT 4 YEARS OR MORE	521501	REAL ESTATE	01 - UNDERGRADUATE CERTIFICATE	PASS	2.33	2830	121010	PASS	2.73	2830	103515	PASS	N/A	N/A	N/A	N/A	N/A	32045	10881
002808	GRIFFIN COLLEGE	AMHERST	NY	14242-3592	PRIVATE, NOT-FOR-PROFIT 4 YEARS OR MORE	520301	ACCOUNTING	01 - UNDERGRADUATE CERTIFICATE	PASS	0	0	30574	PASS	0	0	12193	PASS	N/A	N/A	N/A	N/A	N/A	30574	2640
002812	TIOCHARE COLLEGE	BUFFALO	NY	14220-2094	PRIVATE, NOT-FOR-PROFIT 4 YEARS OR MORE	510910	RADIOLOGIC MEDICAL SONOGRAPHY/SONOGRAPHER AND ULTRASOUND TECHNICIAN	01 - UNDERGRADUATE CERTIFICATE	PASS	2.37	1478	62283	PASS	3.31	1478	44628	PASS	N/A	N/A	N/A	N/A	N/A	58124	10872
002812	TIOCHARE COLLEGE	BUFFALO	NY	14220-2094	PRIVATE, NOT-FOR-PROFIT 4 YEARS OR MORE	513901	LICENSED PRACTICE/VOCATIONAL NURSE TRAINING	01 - UNDERGRADUATE CERTIFICATE	PASS	6.3	1959	31088	PASS	14.58	1959	13483	PASS	N/A	N/A	N/A	N/A	N/A	30720	3108
002823	SAINT JAMES UNIVERSITY	JAMAICA	NY	11439-1341	PRIVATE, NOT-FOR-PROFIT 4 YEARS OR MORE	510912	PHYSICIAN ASSISTANT	01 - UNDERGRADUATE CERTIFICATE	PASS	4.08	4281	105226	PASS	4.88	4281	87757	PASS	N/A	N/A	N/A	N/A	N/A	98429	10522
002835	STATE UNIVERSITY OF NEW YORK AT ALBANY	ALBANY	NY	12222-0003	PUBLIC 4 YEARS OR MORE	422805	SCHOOL PSYCHOLOGY	01 - UNDERGRADUATE CERTIFICATE	PASS	4.45	3224	72473	PASS	7.77	3224	41474	PASS	N/A	N/A	N/A	N/A	N/A	91313	2702
002835	STATE UNIVERSITY OF NEW YORK AT BUFFALO	BUFFALO	NY	14260-0001	PUBLIC 4 YEARS OR MORE	131205	SECONDARY EDUCATION AND TEACHING	01 - UNDERGRADUATE CERTIFICATE	PASS	6.57	2449	37249	PASS	12.49	2449	19374	PASS	N/A	N/A	N/A	N/A	N/A	37249	19374
002835	STATE UNIVERSITY OF NEW YORK AT STONY BROOK	STONY BROOK	NY	11794-0031	PUBLIC 4 YEARS OR MORE	130401	EDUCATIONAL LEADERS																	

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Institution Code (Six-Digit)	Institution Name	City	State	Zip	IP-Code	IP-Name	Credit Level	Official Program Pass/Fail/Full	Appeal Status	Debt-to-Earnings Annual Rate	Debt-to-Earnings Annual Rate Numerator	Debt-to-Earnings Annual Rate Denominator	Debt-to-Earnings Annual Rate Pass/Fail/Zone	Debt-to-Earnings Disciplinary Income Rate	Debt-to-Earnings Disciplinary Income Rate Numerator	Debt-to-Earnings Disciplinary Income Rate Denominator	Debt-to-Earnings Transitional Rate	Debt-to-Earnings Transitional Rate Numerator	Debt-to-Earnings Transitional Rate Denominator	Debt-to-Earnings Transitional Rate Pass/Fail/Zone	Debt-to-Earnings Transitional Rate Numerator	Debt-to-Earnings Transitional Rate Denominator	Debt-to-Earnings Transitional Rate Pass/Fail/Zone	Mean Annual Earnings	Median Annual Earnings	
03300	MORE COLLEGE OF ART AND DESIGN	PHILADELPHIA	PA	191031190	PRIVATE, NOT FOR PROFIT 4 YEARS OR MORE	131302	ART THERAPY EDUCATION	PASS		5.84	2362	42842	PASS	9.93	2503	25187	PASS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	38655	42842
03309	KENICE COLLEGE	PHILADELPHIA	PA	191024809	PRIVATE, NOT FOR PROFIT 4 YEARS OR MORE	220052	LEGAL ASSISTANT/PARALEGAL	PASS		5.28	1983	37527	PASS	9.97	1983	19837	PASS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	33307	37527
03313	WIDENER UNIVERSITY	CHESTER	PA	190135732	PRIVATE, NOT FOR PROFIT 4 YEARS OR MORE	220052	LEGAL ASSISTANT/PARALEGAL	PASS		3.61	1311	36329	PASS	7.05	1311	18574	PASS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	34991	36329
03378	UNIVERSITY OF PENNSYLVANIA	PHILADELPHIA	PA	191042318	PRIVATE, NOT FOR PROFIT 4 YEARS OR MORE	240381	CTV/URBAN, COMMUNITY AND REGIONAL PLANNING	PASS		7.97	4422	55443	PASS	13.7	4422	37788	PASS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	53441	54256
03378	UNIVERSITY OF PENNSYLVANIA	PHILADELPHIA	PA	191042318	PRIVATE, NOT FOR PROFIT 4 YEARS OR MORE	240381	POLITICAL SCIENCE AND GOVERNMENT, OTHER	PASS		0.88	916	103104	PASS	1.07	916	85499	PASS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	101304	73905
03379	UNIVERSITY OF PITTSBURGH - PITTSBURGH	PITTSBURGH	PA	152600051	PUBLIC 4 YEARS OR MORE	290102	MASS COMMUNICATION/MEDIA STUDIES	PASS		2.72	1035	37928	PASS	5.1	1035	20373	PASS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	17928	31967
03379	UNIVERSITY OF PITTSBURGH - PITTSBURGH	PITTSBURGH	PA	152600051	PUBLIC 4 YEARS OR MORE	130051	EDUCATION, GENERAL	PASS		7.04	2943	41771	PASS	12.2	2943	24138	PASS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	40367	41771
03379	UNIVERSITY OF PITTSBURGH - PITTSBURGH	PITTSBURGH	PA	152600051	PUBLIC 4 YEARS OR MORE	510602	DENTAL HYGIENE/HYGIENTIST	PASS		6.4	2763	43133	PASS	10.83	2763	25475	PASS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	41743	41133
03395	PENNSYLVANIA COLLEGE OF TECHNOLOGY	WILLIAMSPORT	PA	177053779	PUBLIC 4 YEARS OR MORE PROPRIETARY 4 YEARS OR MORE	510801	MEDICAL/CLINICAL ASSISTANT	PASS		4.92	1028	20881	PASS	31.86	1028	3226	FAIL	N/A	N/A	N/A	N/A	N/A	N/A	N/A	17815	26128
03421	BOB JONES UNIVERSITY	GREENVILLE	SC	296141000	PROPRIETARY 4 YEARS OR MORE	313262	ELEMENTARY EDUCATION AND TEACHING	PASS		4.12	798	19364	PASS	46.60	798	1709	FAIL	N/A	N/A	N/A	N/A	N/A	N/A	N/A	18333	19364
03421	BOB JONES UNIVERSITY	GREENVILLE	SC	296141000	PROPRIETARY 4 YEARS OR MORE	313210	EARLY CHILDHOOD EDUCATION AND TEACHING	PASS		6.06	1349	22226	PASS	29.51	1349	4573	ZONE	N/A	N/A	N/A	N/A	N/A	N/A	N/A	20052	22226
03421	BOB JONES UNIVERSITY	GREENVILLE	SC	296141000	PROPRIETARY 4 YEARS OR MORE	240103	HUMANITIES/HUMANISTIC STUDIES	PASS		2	399	19938	PASS	17.47	399	2283	PASS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	31926	19938
03421	BOB JONES UNIVERSITY	GREENVILLE	SC	296141000	PROPRIETARY 4 YEARS OR MORE	190201	BIBLICAL/BIBLICAL STUDIES	PASS		6.67	1448	21591	PASS	35.87	1448	4035	FAIL	N/A	N/A	N/A	N/A	N/A	N/A	N/A	21691	20325
03421	BOB JONES UNIVERSITY	GREENVILLE	SC	296141000	PROPRIETARY 4 YEARS OR MORE	190401	RELIGIOUS EDUCATION	PASS		5.29	1019	19250	PASS	63.88	1019	1595	FAIL	N/A	N/A	N/A	N/A	N/A	N/A	N/A	19250	14460
03421	BOB JONES UNIVERSITY	GREENVILLE	SC	296141000	PROPRIETARY 4 YEARS OR MORE	422803	COUNSELING PSYCHOLOGY	PASS		4.43	823	18649	PASS	82.79	823	994	FAIL	N/A	N/A	N/A	N/A	N/A	N/A	N/A	18649	18632
03421	BOB JONES UNIVERSITY	GREENVILLE	SC	296141000	PROPRIETARY 4 YEARS OR MORE	430104	CRIMINAL JUSTICE/SOCIAL SERVICES	PASS		5.59	2014	35997	PASS	10.98	2014	18942	PASS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	15997	32006
03421	BOB JONES UNIVERSITY	GREENVILLE	SC	296141000	PROPRI																					

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003609	SAN JACINTO COMMUNITY COLLEGE DISTRICT	PASADENA	TX	77504-3323	PUBLIC 2 TO 3 YEARS	480508	WELDING TECHNOLOGY/WELDER.	01- UNDERGRADUATE CERTIFICATE	PASS	0	3	41892	PASS	0.01	3	40373	PASS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	41692	35738
003610	SAN JACINTO COMMUNITY COLLEGE DISTRICT	PASADENA	TX	77503-3323	PUBLIC 2 TO 3 YEARS	513901	LICENSED PRACTICAL/VOCATIONAL NURSE TRAINING	01- UNDERGRADUATE CERTIFICATE	PASS	0.03	13	41735	PASS	0.05	13	24080	PASS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	41735	39748
003610	SCHREINER UNIVERSITY	KERNVILLE	TX	78628-5650	PRIVATE, NOT-FOR-PROFIT 4 YEARS OR MORE	513801	REGISTERED NURSING/REGISTERED NURSE.	01- UNDERGRADUATE CERTIFICATE	PASS	4.21	1382	32754	PASS	9.15	1382	15099	PASS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	31967	32754
003610	SCHREINER UNIVERSITY	KERNVILLE	TX	78628-5650	PRIVATE, NOT-FOR-PROFIT 4 YEARS OR MORE	513901	LICENSED PRACTICAL/VOCATIONAL NURSE TRAINING	01- UNDERGRADUATE CERTIFICATE	PASS	4.21	1382	32754	PASS	9.15	1382	15099	PASS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	31967	32754
003613	SOUTHERN METHODIST UNIVERSITY	DALLAS	TX	75270-3030	PRIVATE, NOT-FOR-PROFIT 4 YEARS OR MORE	500304	ANIMATION, INTERACTIVE TECHNOLOGY, VIDEO GRAPHICS AND SPECIAL EFFECTS.	04- POST BACCALAUREATE CERTIFICATE	PASS	11.66	618	52442	ZONE	17.58	618	18478	PASS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	49687	52442
003614	SOUTHWEST TEXAS JUNIOR COLLEGE	ULVALE	TX	78861-6221	PUBLIC 2 TO 3 YEARS	120403	COMPUTER TECHNOLOGY/COMPUTER SYSTEMS TECHNOLOGY.	01- UNDERGRADUATE CERTIFICATE	PASS	0	12329	PASS	0	0	0	PASS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	12525	12061	
003614	SOUTHWEST TEXAS JUNIOR COLLEGE	ULVALE	TX	78861-6221	PUBLIC 2 TO 3 YEARS	513901	LICENSED PRACTICAL/VOCATIONAL NURSE TRAINING	01- UNDERGRADUATE CERTIFICATE	PASS	2.62	863	32905	PASS	5.05	863	13250	PASS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	27378	32905
003626	TARRANT COUNTY COLLEGE DISTRICT	FORT WORTH	TX	76102-0509	PUBLIC 2 TO 3 YEARS	520201	BUSINESS ADMINISTRATION AND MANAGEMENT, GENERAL.	01- UNDERGRADUATE CERTIFICATE	PASS	0	30703	PASS	0	0	13046	PASS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	27410	30703
003627	TEMPLE COLLEGE	TEMPLE	TX	76704-7435	PUBLIC 2 TO 3 YEARS	513901	LICENSED PRACTICAL/VOCALNURE NURSE TRAINING	01- UNDERGRADUATE CERTIFICATE	PASS	2.72	1033	37287	PASS	5.17	1033	12632	PASS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	32787	362
003627	TEMPLE COLLEGE	TEMPLE	TX	76704-7435	PUBLIC 2 TO 3 YEARS	520205	BUSINESS ADMINISTRATION AND MANAGEMENT, GENERAL.	01- UNDERGRADUATE CERTIFICATE	PASS	2.48	446	18085	PASS	106.64	446	425	FAIL	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	18086	13381
003628	TEXARKANA COLLEGE	TEXARKANA	TX	75799-0001	PUBLIC 2 TO 3 YEARS	513901	LICENSED PRACTICAL/VOCATIONAL NURSE TRAINING	01- UNDERGRADUATE CERTIFICATE	PASS	0	0	34810	PASS	0	0	17564	PASS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	14607	34810
003632	TEXAS A&M UNIVERSITY	THE RICHLAND SPRING	TX	77841-1246	PUBLIC 4 YEARS OR MORE	450902	INTERNATIONAL RELATIONS AND AFFAIRS.	08- GRADUATE CERTIFICATE	PASS	2.13	1141	53449	PASS	3.18	1141	35794	PASS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	13449	49758
003634	TEXAS STATE TECHNICAL COLLEGE	WACO	TX	76795-1695	PUBLIC 2 TO 3 YEARS	510403	ELECTROMECHANICAL TECHNOLOGY/ELECTROMECHANICAL ENGINEERING TECHNOLOGY.	01- UNDERGRADUATE CERTIFICATE	PASS	1.03	321	30948	PASS	2.41	321	13293	PASS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	30948	29332
003634	TEXAS STATE TECHNICAL COLLEGE	WACO	TX	76795-1695	PUBLIC 2 TO 3 YEARS	515102	COMPUTER TECHNOLOGY/COMPUTER SYSTEMS TECHNOLOGY.	01- UNDERGRADUATE CERTIFICATE	PASS	1.15	334	28906	PASS	2.96	334	11251	PASS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	28902	29095
003634	TEXAS STATE TECHNICAL COLLEGE	WACO	TX	76795-1695	PUBLIC 2 TO 3 YEARS	460303	UNEMPLOYER.	01- UNDERGRADUATE CERTIFICATE	PASS	1.4	948	67562	PASS	1.89	9													

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004076	KIRKWOOD COMMUNITY COLLEGE	CEAR RADOS	IA	52462086	PUBLIC 2 TO 3 YEARS	010903	ANIMAL HEALTH	01 - UNDERGRADUATE CERTIFICATE	PASS		3.41	781	22631	PASS	15.02	781	5198	PASS	N/A	N/A	N/A	N/A	N/A	20956	22857		
004076	KIRKWOOD COMMUNITY COLLEGE	CEAR RADOS	IA	52462086	PUBLIC 2 TO 3 YEARS	070003	AUTOMOBILE/COLISION AND REPAIR TECHNOLOGY/TECHNICIAN	01 - UNDERGRADUATE CERTIFICATE	PASS		4.48	1685	37065	PASS	8.44	1685	19518	PASS	N/A	N/A	N/A	N/A	N/A	17606	17244		
004117	GRADY HEALTH SYSTEM	ATLANTA	GA	3030335050	PUBLIC 2 TO 3 YEARS	510607	MEDICAL RADIOLOGIC TECHNOLOGY/SCIENCE - RADIATION THERAPIST	01 - UNDERGRADUATE CERTIFICATE	PASS		2.47	1104	44697	PASS	4.09	1104	26942	PASS	N/A	N/A	N/A	N/A	N/A	44507	44126		
004462	MONTGOMERY COUNTY COMMUNITY COLLEGE	BLUE BELL	PA	19422880	PUBLIC 2 TO 3 YEARS PROPRIETARY LESS THAN 2 YEARS	430807	CRIMINAL JUSTICE/POLICE SCIENCE	01 - UNDERGRADUATE CERTIFICATE	PASS		1.03	537	51922	PASS	1.56	537	34267	PASS	N/A	N/A	N/A	N/A	N/A	51902	49824		
004467	TUCSON COLLEGE	TUCSON	AZ	857131781	PROPRIETARY LESS THAN 2 YEARS	460302	ELECTRICIAN	01 - UNDERGRADUATE CERTIFICATE	PASS		6.29	1237	19257	PASS	75.65	1212	18027	PASS	N/A	N/A	N/A	N/A	N/A	19227	16213		
004467	TUCSON COLLEGE	TUCSON	AZ	857131781	PROPRIETARY LESS THAN 2 YEARS	510713	MEDICAL INSURANCE CODING SPECIALIST/CODER	01 - UNDERGRADUATE CERTIFICATE	PASS		6.11	1214	18938	PASS	55.1	1214	22031	PASS	N/A	N/A	N/A	N/A	N/A	17340	18855		
004467	TUCSON COLLEGE	TUCSON	AZ	857131781	PROPRIETARY LESS THAN 2 YEARS	510801	MEDICAL ASSISTANT	01 - UNDERGRADUATE CERTIFICATE	ZONE		8.41	1215	14432	ZONE	100	1215	0	FAIL	9.08	1311	14432	ZONE	100	1311	0	FAIL	14336
004467	TUCSON COLLEGE	TUCSON	AZ	857131781	PROPRIETARY LESS THAN 2 YEARS	510805	PHARMACY TECHNICIAN/ASSISTANT	01 - UNDERGRADUATE CERTIFICATE	ZONE		5.68	1198	21080	PASS	34.97	1198	3425	FAIL	N/A	N/A	N/A	N/A	N/A	20446	21086		
004467	TUCSON COLLEGE	TUCSON	AZ	857131781	PROPRIETARY LESS THAN 2 YEARS	513902	NURSING ASSISTANT/AND PATIENT CARE ASSISTANT/AND	01 - UNDERGRADUATE CERTIFICATE	PASS		7.18	1280	17908	PASS	836.6	1280	1153	FAIL	N/A	N/A	N/A	N/A	N/A	17329	15578		
004503	EVEREST COLLEGE	COLORADO SPRINGS	CO	809163548	PROPRIETARY 2 TO 3 YEARS	510601	DENTAL ASSISTING/ASSISTANT	01 - UNDERGRADUATE CERTIFICATE	ZONE		8.41	1111	15578	ZONE	100	1311	0	FAIL	8.41	1311	15578	ZONE	100	1311	0	FAIL	15739
004503	EVEREST COLLEGE	COLORADO SPRINGS	CO	809163548	PROPRIETARY 2 TO 3 YEARS	510713	MEDICAL INSURANCE CODING SPECIALIST/CODER	01 - UNDERGRADUATE CERTIFICATE	ZONE		10.01	1526	15231	ZONE	100	1526	0	FAIL	8.6	1311	15231	ZONE	100	1311	0	FAIL	15231
004503	EVEREST COLLEGE	COLORADO SPRINGS	CO	809163548	PROPRIETARY 2 TO 3 YEARS	510716	MEDICAL ADMINISTRATIVE/EXECUTIVE ASSISTANT AND MEDICAL SECRETARY	01 - UNDERGRADUATE CERTIFICATE	ZONE		9.75	1435	14720	ZONE	100	1435	0	FAIL	10.45	1538	14720	ZONE	100	1538	0	FAIL	14720
004503	EVEREST COLLEGE	COLORADO SPRINGS	CO	809163548	PROPRIETARY 2 TO 3 YEARS	510801	DENTAL ASSISTING/ASSISTANT	01 - UNDERGRADUATE CERTIFICATE	ZONE		10.93	1847	16893	ZONE	100	1847	0	FAIL	11.38	1907	16893	ZONE	100	1907	0	FAIL	16893
004503	EVEREST COLLEGE	COLORADO SPRINGS	CO	809163548	PROPRIETARY 2 TO 3 YEARS	513901	MESSAGE THERAPY/THERAPEUTIC MESSAGE	01 - UNDERGRADUATE CERTIFICATE	ZONE		9.78	1339	13473	ZONE	100	1319	0	FAIL	8.11	1093	13473	ZONE	100	1093	0	FAIL	13473
004507	EVEREST COLLEGE	THONTOON	AZ	852294139	PROPRIETARY 2 TO 3 YEARS	430112	SECURITIES SERVICES ADMINISTRATION/MANAGEMENT	01 - UNDERGRADUATE CERTIFICATE	FAIL		13.43	3813	28417	FAIL	35.43	3813	16782	FAIL	N/A	N/A	N/A	N/A	N/A	2497			

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052571	SOUTHCENTRAL KENTUCKY COMMUNITY AND TECHNICAL COLLEGE	BOWLING GREEN	KY	423013601	PUBLIC 2 TO 3 YEARS	470201	HEATING, AIR CONDITIONING, VENTILATION AND REFRIGERATION MAINTENANCE TECHNOLOGIES/TECHNICIAN	01 - UNDERGRADUATE CERTIFICATE	PASS		0.62	284	34630	PASS	1.67	284	16975	PASS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	34459	34630
052571	SOUTHCENTRAL KENTUCKY COMMUNITY AND TECHNICAL COLLEGE	BOWLING GREEN	KY	423013601	PUBLIC 2 TO 3 YEARS	470303	INDUSTRIAL MECHANICS AND MAINTENANCE TECHNOLOGY	01 - UNDERGRADUATE CERTIFICATE	PASS		0.69	328	47001	PASS	1.11	328	29346	PASS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	47001	45062
052571	SOUTHCENTRAL KENTUCKY COMMUNITY AND TECHNICAL COLLEGE	BOWLING GREEN	KY	423013601	PUBLIC 2 TO 3 YEARS	510716	MEDICAL ADMINISTRATIVE/EXECUTIVE ASSISTANT AND MEDICAL SECRETARY	01 - UNDERGRADUATE CERTIFICATE	PASS		3.03	621	20642	PASS	22.12	621	2807	ZONE	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	20642	19941
052571	SOUTHCENTRAL KENTUCKY COMMUNITY AND TECHNICAL COLLEGE	BOWLING GREEN	KY	423013601	PUBLIC 2 TO 3 YEARS	539808	RESPIRATORY CARE THERAPIST	01 - UNDERGRADUATE CERTIFICATE	PASS		2.25	771	34363	PASS	4.67	771	16508	PASS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	16508	14361
052571	SOUTHCENTRAL KENTUCKY COMMUNITY AND TECHNICAL COLLEGE	BOWLING GREEN	KY	423013601	PUBLIC 2 TO 3 YEARS	539908	LICENSED PRACTICAL/VOCATIONAL NURSE TRAINING	01 - UNDERGRADUATE CERTIFICATE	PASS		3.17	1021	32109	PASS	7.06	1021	14448	PASS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	14448	30899
052579	GREATER LOWELL REGIONAL VOCATIONAL TECHNICAL SCHOOL	TYNGBORO	MA	01872214	PUBLIC LESS THAN 2 YEARS	539901	LICENSED PRACTICAL/VOCATIONAL NURSE TRAINING	01 - UNDERGRADUATE CERTIFICATE	PASS		1.41	690	48932	PASS	2.23	690	30917	PASS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	48932	48932
052680	TENNESSEE COLLEGE OF APPLIED TECHNOLOGY - COVINGTON	COVINGTON	TN	380190249	PUBLIC 2 TO 3 YEARS	470303	INDUSTRIAL MECHANICS AND MAINTENANCE TECHNOLOGY	01 - UNDERGRADUATE CERTIFICATE	PASS		0	0	21353	PASS	0	0	5488	PASS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	21353	21353
052680	TENNESSEE COLLEGE OF APPLIED TECHNOLOGY - COVINGTON	COVINGTON	TN	380190249	PUBLIC 2 TO 3 YEARS	470604	AUTOMOBILE/AUTOMOTIVE MECHANICS TECHNOLOGY/TECHNICIAN	01 - UNDERGRADUATE CERTIFICATE	PASS		0	0	23661	PASS	0	0	6038	PASS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	23661	22794
052680	TENNESSEE COLLEGE OF APPLIED TECHNOLOGY - COVINGTON	COVINGTON	TN	380190249	PUBLIC 2 TO 3 YEARS	480501	MACHINE TOOL TECHNOLOGY/MACHINIST	01 - UNDERGRADUATE CERTIFICATE	PASS		0	0	17544	PASS	0	0	19889	PASS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	19889	22794
052680	TENNESSEE COLLEGE OF APPLIED TECHNOLOGY - COVINGTON	COVINGTON	TN	380190249	PUBLIC 2 TO 3 YEARS	480508	WELDING TECHNOLOGY/WELDER	01 - UNDERGRADUATE CERTIFICATE	PASS		0	0	20066	PASS	0	0	20951	PASS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	20951	26066
052680	TENNESSEE COLLEGE OF APPLIED TECHNOLOGY - COVINGTON	COVINGTON	TN	380190249	PUBLIC 2 TO 3 YEARS	539901	LICENSED PRACTICAL/VOCATIONAL NURSE TRAINING	01 - UNDERGRADUATE CERTIFICATE	PASS		0	0	34138	PASS	0	0	16683	PASS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	16683	33523
052680	TENNESSEE COLLEGE OF APPLIED TECHNOLOGY - COVINGTON	COVINGTON	TN	380190249	PUBLIC 2 TO 3 YEARS	520499	BUSINESS OPERATIONS SUPPORT AND SECRETARIAL SERVICES, OTHER	01 - UNDERGRADUATE CERTIFICATE	PASS		0	0	14203	PASS	0	0	0	PASS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	14203	13962
052681	TENNESSEE COLLEGE OF APPLIED TECHNOLOGY - ELIZABETHTON	ELIZABETHTON	TN	374630654	PUBLIC 2 TO 3 YEARS	460602																						

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05359	TENNESSEE COLLEGE OF APPLIED TECHNOLOGY - NASHVILLE	NASHVILLE	TN	37204515	PUBLIC 2 TO 3 YEARS	120401	COSMETOLOGY/COSMETOLOGIST, GENERAL	RT - UNDERGRADUATE CERTIFICATE	PASS		1.58	225	14384	PASS	100	225	0	0	FAIL	N/A	N/A	N/A	N/A	N/A	N/A	13222	14147
05359	TENNESSEE COLLEGE OF APPLIED TECHNOLOGY - NASHVILLE	NASHVILLE	TN	37204515	PUBLIC 2 TO 3 YEARS	120409	AESTHETICIAN/ESTHETICIAN AND SKIN CARE SPECIALIST	RT - UNDERGRADUATE CERTIFICATE	PASS		0	0	14147	PASS	0	0	0	0	PASS	N/A	N/A	N/A	N/A	N/A	N/A	13939	14147
05359	TENNESSEE COLLEGE OF APPLIED TECHNOLOGY - NASHVILLE	NASHVILLE	TN	37204515	PUBLIC 2 TO 3 YEARS	190709	CHILD CARE PROVIDER/ASSISTANT	RT - UNDERGRADUATE CERTIFICATE	PASS		2.18	314	14354	PASS	100	314	0	0	FAIL	N/A	N/A	N/A	N/A	N/A	N/A	14354	13635
05359	TENNESSEE COLLEGE OF APPLIED TECHNOLOGY - NASHVILLE	NASHVILLE	TN	37204515	PUBLIC 2 TO 3 YEARS	470201	ELECTRICAL/ELECTRONICS EQUIPMENT INSTALLATION AND REPAIR, GENERAL	RT - UNDERGRADUATE CERTIFICATE	PASS		1.33	241	18337	PASS	53.31	241	452	FAIL	N/A	N/A	N/A	N/A	N/A	N/A	N/A	17933	18107
05359	TENNESSEE COLLEGE OF APPLIED TECHNOLOGY - NASHVILLE	NASHVILLE	TN	37204515	PUBLIC 2 TO 3 YEARS	470201	HEATING, AIR CONDITIONING, VENTILATION AND REFRIGERATION MAINTENANCE TECHNOLOGY/TECHNICIAN	RT - UNDERGRADUATE CERTIFICATE	PASS		0.86	225	25875	PASS	2.75	225	8220	PASS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	25875	25468
05359	TENNESSEE COLLEGE OF APPLIED TECHNOLOGY - NASHVILLE	NASHVILLE	TN	37204515	PUBLIC 2 TO 3 YEARS	470603	INDUSTRIAL MECHANICS AND MAINTENANCE TECHNOLOGY/TECHNICIAN	RT - UNDERGRADUATE CERTIFICATE	PASS		0	0	19327	PASS	0	1602	PASS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	18180	19257
05359	TENNESSEE COLLEGE OF APPLIED TECHNOLOGY - NASHVILLE	NASHVILLE	TN	37204515	PUBLIC 2 TO 3 YEARS	470604	AUTOMOBILE/AUTOMOTIVE MECHANICS TECHNOLOGY/TECHNICIAN	RT - UNDERGRADUATE CERTIFICATE	PASS		0	0	27762	PASS	0	10107	PASS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	26115	27762
05359	TENNESSEE COLLEGE OF APPLIED TECHNOLOGY - NASHVILLE	NASHVILLE	TN	37204515	PUBLIC 2 TO 3 YEARS	470608	AIRCRAFT POWERPLANT TECHNOLOGY/TECHNICIAN	RT - UNDERGRADUATE CERTIFICATE	PASS		0	0	36158	PASS	0	18053	PASS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	36158	34909
05359	TENNESSEE COLLEGE OF APPLIED TECHNOLOGY - NASHVILLE	NASHVILLE	TN	37204515	PUBLIC 2 TO 3 YEARS	480501	MACHINE TOOL TECHNOLOGY/MACHINIST	RT - UNDERGRADUATE CERTIFICATE	PASS		0	0	30952	PASS	0	13297	PASS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	29221	30952
05359	TENNESSEE COLLEGE OF APPLIED TECHNOLOGY - NASHVILLE	NASHVILLE	TN	37204515	PUBLIC 2 TO 3 YEARS	480502	WELDING TECHNOLOGY/WELDER	RT - UNDERGRADUATE CERTIFICATE	PASS		0	0	24874	PASS	0	7219	PASS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	23891	24874
05359	TENNESSEE COLLEGE OF APPLIED TECHNOLOGY - NASHVILLE	NASHVILLE	TN	37204515	PUBLIC 2 TO 3 YEARS	510603	DENTAL LABORATORY TECHNOLOGY/TECHNICIAN	RT - UNDERGRADUATE CERTIFICATE	PASS		0.04	8	17909	PASS	100	8	0	0	FAIL	N/A	N/A	N/A	N/A	N/A	N/A	17909	15914
05359	TENNESSEE COLLEGE OF APPLIED TECHNOLOGY - NASHVILLE	NASHVILLE	TN	37204515	PUBLIC 2 TO 3 YEARS	513901	LICENSED PRACTICAL/VOCATIONAL NURSE TRAINING	RT - UNDERGRADUATE CERTIFICATE	PASS		0	0	34425	PASS	0	16770	PASS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	32386	34425
05360	TENNESSEE COLLEGE OF APPLIED TECHNOLOGY- MEMPHIS	MEMPHIS	TN	38105304	PUBLIC 2 TO 3 YEARS	120401	COSMETOLOGY/COSMETOLOGIST, GENERAL	RT - UNDERGRADUATE CERTIFICATE	PASS		0	0	11499	PASS	0	0	0	0	PASS	N/A	N/A	N/A	N/A	N/A	N/A	11499	9950
05360	TENNESSEE COLLEGE OF APPLIED TECHNOLOGY- MEMPHIS	MEMPHIS	TN	38105304	PUBLIC 2 TO 3 YEARS	120402	BARBERING/BARBER	RT - UNDERGRADUATE CERTIFICATE	PASS		0	0	11739	PASS	0	0	0	0	PASS	N/A	N/A	N/A	N/A	N/A	N/A	11739	6351
05360	TENNESSEE COLLEGE OF APPLIED TECHNOLOGY- MEMPHIS	MEMPHIS	TN	38105304	PUBLIC 2 TO 3 YEARS	460101	BAKING/PAstry	RT - UNDERGRADUATE CERTIFICATE	PASS		0	0	7217	PASS	0	0	0	0	PASS	N/A	N/A	N/A	N/A	N/A	N/A	7217	2519
05360	TENNESSEE COLLEGE OF APPLIED TECHNOLOGY- MEMPHIS	MEMPHIS	TN	38105304	PUBLIC 2 TO 3 YEARS	460415	BUILDING CONSTRUCTION TECHNOLOGY	RT																			

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005438	SALINE COUNTY CAREER CENTER	MARSHALL	MO	653401088	PUBLIC LESS THAN 2 YEARS	519905	LICENSED PRACTICAL/VOCATIONAL NURSE TRAINING	01- UNDERGRADUATE CERTIFICATE	PASS		3.22	950	29471	PASS	8.03	950	11855	PASS	N/A	N/A	N/A	N/A	29471	27912	
005449	CENTRAL CAROLINA COMMUNITY COLLEGE	SANFORD	NC	273300000	PUBLIC 2 TO 3 YEARS	512049	AESTHETICIAN/ESTHETICIAN AND SKIN CARE SPECIALIST	01- UNDERGRADUATE CERTIFICATE	PASS		0	0	132629	PASS	0	0	0	PASS	N/A	N/A	N/A	N/A	132629	9559	
005449	CENTRAL CAROLINA COMMUNITY COLLEGE	SANFORD	NC	273300000	PUBLIC 2 TO 3 YEARS	290706	CHILD DEVELOPMENT	01- UNDERGRADUATE CERTIFICATE	PASS		0	14003	PASS	0	0	0	PASS	N/A	N/A	N/A	N/A	N/A	14003		
005449	CENTRAL CAROLINA COMMUNITY COLLEGE	SANFORD	NC	273300000	PUBLIC 2 TO 3 YEARS	510801	MEDICAL/CLINICAL ASSISTANT	01- UNDERGRADUATE CERTIFICATE	PASS		0	0	24388	PASS	0	0	0	6733	PASS	N/A	N/A	N/A	N/A	19760	24388
005449	CENTRAL CAROLINA COMMUNITY COLLEGE	SANFORD	NC	273300000	PUBLIC 2 TO 3 YEARS	513905	LICENSED PRACTICAL/VOCATIONAL NURSE TRAINING	01- UNDERGRADUATE CERTIFICATE	PASS		0	0	38001	PASS	0	0	20346	PASS	N/A	N/A	N/A	N/A	36194	38001	
005449	CENTRAL CAROLINA COMMUNITY COLLEGE	SANFORD	NC	273300000	PUBLIC 2 TO 3 YEARS	520204	OFFICE MANAGEMENT & SUPERVISION	01- UNDERGRADUATE CERTIFICATE	PASS		0	16845	PASS	0	0	0	PASS	N/A	N/A	N/A	N/A	16845	16517		
005452	TETERBORO SCHOOL OF AERONAUTICS	TETERBORO	NJ	070610001	PROPRIETARY 2 TO 3 YEARS	470607	AIRCRAFT MECHANICS AND AIRCRAFT MAINTENANCE TECHNOLOGY/TECHNICIAN	01- UNDERGRADUATE CERTIFICATE	PASS		3.79	1657	43899	PASS	6.36	1657	26044	PASS	N/A	N/A	N/A	N/A	42854	43899	
005461	SALEM COMMUNITY COLLEGE	CARMEYS POINT	NJ	080692799	PUBLIC 2 TO 3 YEARS	513901	LICENSED PRACTICAL/VOCATIONAL NURSE TRAINING	01- UNDERGRADUATE CERTIFICATE	PASS		0.91	441	48385	PASS	1.44	441	30530	PASS	N/A	N/A	N/A	N/A	42967	48385	
005463	ALAMANCE COMMUNITY COLLEGE	GRAHAM	NC	272530000	PUBLIC 2 TO 3 YEARS	510801	DENTAL ASSISTING/ASSISTANT	01- UNDERGRADUATE CERTIFICATE	PASS		0	0	27291	PASS	0	0	9636	PASS	N/A	N/A	N/A	N/A	24952	27291	
005464	RICHMOND COMMUNITY COLLEGE	HAYHEAT	NC	283454522	PUBLIC 2 TO 3 YEARS	513905	LICENSED PRACTICAL/VOCATIONAL NURSE TRAINING	01- UNDERGRADUATE CERTIFICATE	PASS		0	0	35942	PASS	0	0	18287	PASS	N/A	N/A	N/A	N/A	32118	35942	
005467	SOWELA TECHNICAL COMMUNITY COLLEGE	LAKE CHARLES	LA	706166950	PUBLIC 2 TO 3 YEARS	460302	ELECTRICIAN	01- UNDERGRADUATE CERTIFICATE	PASS		0	66432	PASS	0	0	48777	PASS	N/A	N/A	N/A	N/A	66432	63036		
005467	SOWELA TECHNICAL COMMUNITY COLLEGE	LAKE CHARLES	LA	706166950	PUBLIC 2 TO 3 YEARS	513901	LICENSED PRACTICAL/VOCATIONAL NURSE TRAINING	01- UNDERGRADUATE CERTIFICATE	PASS		0	0	34305	PASS	0	0	16050	PASS	N/A	N/A	N/A	N/A	13506	34305	
005498	WICHITA AREA TECHNICAL COLLEGE	WICHITA	KS	672681001	PUBLIC 2 TO 3 YEARS	470607	AIRCRAFT MECHANICS AND AIRCRAFT MAINTENANCE TECHNOLOGY/TECHNICIAN	01- UNDERGRADUATE CERTIFICATE	PASS		2.25	1032	45782	PASS	3.66	1032	28127	PASS	N/A	N/A	N/A	N/A	45425	45782	
005498	WICHITA AREA TECHNICAL COLLEGE	WICHITA	KS	672681001	PUBLIC 2 TO 3 YEARS	470608	AIRCRAFT POWERPLANT TECHNOLOGY/TECHNICIAN	01- UNDERGRADUATE CERTIFICATE	PASS		1.68	801	47397	PASS	2.69	801	29742	PASS	N/A	N/A	N/A	N/A	47397	47397	
005498	WICHITA AREA TECHNICAL COLLEGE	WICHITA	KS	672681001	PUBLIC 2 TO 3 YEARS	510801	DENTAL ASSISTING/ASSISTANT	01- UNDERGRADUATE CERTIFICATE	PASS		2.69	629	23151	PASS	11.04	629	5696	PASS	N/A	N/A	N/A	N/A	21002	23151	
005498	WICHITA AREA TECHNICAL COLLEGE	WICHITA	KS	672681001	PUBLIC 2 TO 3 YEARS	510801	MEDICAL/CLINICAL ASSISTANT	01- UNDERGRADUATE CERTIFICATE	PASS		8.23	667	20610	PASS	22.57	667	2955	ZONE	N/A	N/A	N/A	N/A	16703	20610	
005498	WICHITA AREA TECHNICAL COLLEGE	WICHITA	KS	672681001	PUBLIC 2 TO 3 YEARS	510909	SURGICAL TECHNOLOGY/TECHNOLOGIST	01- UNDERGRADUATE CERTIFICATE	PASS		2.25	680	30358	PASS	5.42	680	12531	PASS	N/A	N/A	N/A	N/A	28514	30358	
00549																									

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005334	ST. CLOUD TECHNICAL AND COMMUNITY COLLEGE	ST. CLOUD	MN	563031240	PUBLIC 2 TO 3 YEARS	460302	ELECTRICIAN	RT - UNDERGRADUATE CERTIFICATE	PASS		3.45	1380	39901	PASS	6.2	1380	22246	PASS	N/A	N/A	N/A	39901	38489
005334	ST. CLOUD TECHNICAL AND COMMUNITY COLLEGE	ST. CLOUD	MN	563031240	PUBLIC 2 TO 3 YEARS	460303	PLUMBING TECHNOLOGY/PLUMBER	RT - UNDERGRADUATE CERTIFICATE	PASS		1.91	799	39800	PASS	3.46	759	21935	PASS	N/A	N/A	N/A	39580	35471
005334	ST. CLOUD TECHNICAL AND COMMUNITY COLLEGE	ST. CLOUD	MN	563031240	PUBLIC 2 TO 3 YEARS	470201	HEATING, AIR CONDITIONING, VENTILATION AND REFRIGERATION MAINTENANCE TECHNOLOGY/TECHNICIAN	RT - UNDERGRADUATE CERTIFICATE	PASS		1.66	734	44095	PASS	2.77	734	26440	PASS	N/A	N/A	N/A	42137	44095
005334	ST. CLOUD TECHNICAL AND COMMUNITY COLLEGE	ST. CLOUD	MN	563031240	PUBLIC 2 TO 3 YEARS	470604	AUTOMOBILE/AUTOMOTIVE MECHANICS TECHNOLOGY/TECHNICIAN	RT - UNDERGRADUATE CERTIFICATE	PASS		3.29	1150	34938	PASS	6.65	1150	17283	PASS	N/A	N/A	N/A	34938	37521
005334	ST. CLOUD TECHNICAL AND COMMUNITY COLLEGE	ST. CLOUD	MN	563031240	PUBLIC 2 TO 3 YEARS	480508	WELDING TECHNOLOGY/WELDER	RT - UNDERGRADUATE CERTIFICATE	PASS		1.78	799	42514	PASS	3.06	759	24809	PASS	N/A	N/A	N/A	38240	42514
005334	ST. CLOUD TECHNICAL AND COMMUNITY COLLEGE	ST. CLOUD	MN	563031240	PUBLIC 2 TO 3 YEARS	513901	LICENSED PRACTICAL/VOCATIONAL NURSE TRAINING	RT - UNDERGRADUATE CERTIFICATE	PASS		2.36	826	34869	PASS	4.79	826	17214	PASS	N/A	N/A	N/A	34869	33846
005335	PINE TECHNICAL AND COMMUNITY COLLEGE	PINE CITY	MN	550632396	PUBLIC 2 TO 3 YEARS	512602	HOME HEALTH AID/HOME ATTENDANT	RT - UNDERGRADUATE CERTIFICATE	PASS		2.39	680	28376	PASS	6.34	680	10703	PASS	N/A	N/A	N/A	28209	28376
005335	PINE TECHNICAL AND COMMUNITY COLLEGE	PINE CITY	MN	550632396	PUBLIC 2 TO 3 YEARS	513901	LICENSED PRACTICAL/VOCATIONAL NURSE TRAINING	RT - UNDERGRADUATE CERTIFICATE	PASS		2.96	991	33441	PASS	6.27	991	15786	PASS	N/A	N/A	N/A	33441	33993
005337	SOUTH CENTRAL COLLEGE	NORTH MANKATO	MN	560011020	PUBLIC 2 TO 3 YEARS	470201	HEATING, AIR CONDITIONING, VENTILATION AND REFRIGERATION MAINTENANCE TECHNOLOGY/TECHNICIAN	RT - UNDERGRADUATE CERTIFICATE	PASS		1.1	528	49048	PASS	2.82	528	22753	PASS	N/A	N/A	N/A	49048	39177
005337	SOUTH CENTRAL COLLEGE	NORTH MANKATO	MN	560011020	PUBLIC 2 TO 3 YEARS	513901	MEDICAL INSURANCE CODING SPECIALIST/CODER	RT - UNDERGRADUATE CERTIFICATE	PASS		2.79	759	27156	PASS	7.98	759	9565	PASS	N/A	N/A	N/A	26495	27156
005337	SOUTH CENTRAL COLLEGE	NORTH MANKATO	MN	560011020	PUBLIC 2 TO 3 YEARS	513901	LICENSED PRACTICAL/VOCATIONAL NURSE TRAINING	RT - UNDERGRADUATE CERTIFICATE	PASS		3.46	1217	35151	PASS	6.95	1217	17496	PASS	N/A	N/A	N/A	35151	34072
005401	MINNESOTA STATE COMMUNITY AND TECHNICAL COLLEGE	PERHAM	MN	565731405	PUBLIC 2 TO 3 YEARS	120401	COSMETOLOGY/COSMETOLOGIST, GENERAL	RT - UNDERGRADUATE CERTIFICATE	ZONE		9.93	1426	14355	ZONE	100	1426	0	FAIL	10.58	1519	14355	14355	12657
005401	MINNESOTA STATE COMMUNITY AND TECHNICAL COLLEGE	PERHAM	MN	565731405	PUBLIC 2 TO 3 YEARS	120503	CULINARY ARTS/CHEF TRAINING	RT - UNDERGRADUATE CERTIFICATE	PASS		5.59	1657	29638	PASS	13.82	1657	11880	PASS	N/A	N/A	N/A	26310	29638
005401	MINNESOTA STATE COMMUNITY AND TECHNICAL COLLEGE	PERHAM	MN	565731405	PUBLIC 2 TO 3 YEARS	460201	CARPENTRY/CARPENTER	RT - UNDERGRADUATE CERTIFICATE	PASS		2.94	828	28132	PASS	7.9	828	10477	PASS	N/A	N/A	N/A	28132	27816
005401	MINNESOTA STATE COMMUNITY AND TECHNICAL COLLEGE	PERHAM	MN	565731405	PUBLIC 2 TO 3 YEARS	460302	ELECTRICIAN	RT - UNDERGRADUATE CERTIFICATE	PASS		4.42	1795	40556	PASS	7.83	1795	22901	PASS	N/A	N/A	N/A	40483	40556
005401	MINNESOTA STATE COMMUNITY AND TECHNICAL COLLEGE	PERHAM	MN	565731405	PUBLIC 2 TO 3 YEARS	460303	UNWORKER	RT - UNDERGRADUATE CERTIFICATE	PASS		1.24	759	60803	PASS	1.75	759	43155	PASS	N/A	N/A	N/A	60803	59251
005401	MINNESOTA STATE COMMUNITY AND TECHNICAL COLLEGE	PERHAM	MN	565731405	PUBLIC 2 TO 3 YEARS	460508	PLUMBING TECHNOLOGY/PLUMBER	RT - UNDERGRADUATE CERTIFICATE	PASS		1.88	759	40518	PASS	3.36	759	23253	PASS	N/A	N/A			

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056000	ATHENS TECHNICAL COLLEGE	ATHENS	GA	30601-1579	PUBLIC 2 TO 3 YEARS	430104	CRIMINAL JUSTICE/SAFETY STUDIES.	R1 - UNDERGRADUATE CERTIFICATE	PASS	0	0	20652	PASS	0	0	2997	PASS	N/A	N/A	N/A	N/A	N/A	N/A	20652	20630
056000	ATHENS TECHNICAL COLLEGE	ATHENS	GA	30601-1579	PUBLIC 2 TO 3 YEARS	460302	ELECTRICIAN.	R1 - UNDERGRADUATE CERTIFICATE	PASS	0	0	30621	PASS	0	0	12966	PASS	N/A	N/A	N/A	N/A	N/A	N/A	30621	29973
056000	ATHENS TECHNICAL COLLEGE	ATHENS	GA	30601-1579	PUBLIC 2 TO 3 YEARS	470201	HEATING, AIR CONDITIONING, VENTILATION AND REFRIGERATION MAINTENANCE TECHNOLOGY/TECHNICIAN.	R1 - UNDERGRADUATE CERTIFICATE	PASS	0	0	13615	PASS	0	0	13880	PASS	N/A	N/A	N/A	N/A	N/A	N/A	13615	10245
056000	ATHENS TECHNICAL COLLEGE	ATHENS	GA	30601-1579	PUBLIC 2 TO 3 YEARS	470604	AUTOMOBILE/AUTOMOTIVE MECHANICS TECHNOLOGY/TECHNICIAN.	R1 - UNDERGRADUATE CERTIFICATE	PASS	0	0	25730	PASS	0	0	8125	PASS	N/A	N/A	N/A	N/A	N/A	N/A	25730	25770
056000	ATHENS TECHNICAL COLLEGE	ATHENS	GA	30601-1579	PUBLIC 2 TO 3 YEARS	510000	HEALTH SERVICES/ALLIED HEALTH/HEALTH SCIENCES, GENERAL.	R1 - UNDERGRADUATE CERTIFICATE	PASS	0	0	31574	PASS	0	0	18079	PASS	N/A	N/A	N/A	N/A	N/A	N/A	31574	32941
056000	ATHENS TECHNICAL COLLEGE	ATHENS	GA	30601-1579	PUBLIC 2 TO 3 YEARS	510801	MEDICAL/CLINICAL ASSISTANT.	R1 - UNDERGRADUATE CERTIFICATE	PASS	0	0	22875	PASS	0	0	5220	PASS	N/A	N/A	N/A	N/A	N/A	N/A	22875	21554
056000	ATHENS TECHNICAL COLLEGE	ATHENS	GA	30601-1579	PUBLIC 2 TO 3 YEARS	510899	ALLIED HEALTH AND MEDICAL ASSISTING SERVICES, OTHER.	R1 - UNDERGRADUATE CERTIFICATE	PASS	0	0	26035	PASS	0	0	26035	PASS	N/A	N/A	N/A	N/A	N/A	N/A	26035	20320
056001	ALBANY TECHNICAL COLLEGE	ALBANY	GA	31701-2648	PUBLIC 2 TO 3 YEARS	130401	COSMETOLOGY/COSMETOLOGIST, GENERAL.	R1 - UNDERGRADUATE CERTIFICATE	PASS	4.65	603	12942	PASS	100	603	0	FAIL	N/A	N/A	N/A	N/A	N/A	N/A	12942	12590
056001	ALBANY TECHNICAL COLLEGE	ALBANY	GA	31701-2648	PUBLIC 2 TO 3 YEARS	130503	CULINARY ARTS/CHEF TRAINING.	R1 - UNDERGRADUATE CERTIFICATE	PASS	5.43	792	14594	PASS	100	792	0	FAIL	N/A	N/A	N/A	N/A	N/A	N/A	14594	15977
056001	ALBANY TECHNICAL COLLEGE	ALBANY	GA	31701-2648	PUBLIC 2 TO 3 YEARS	131210	EARLY CHILDHOOD EDUCATION AND TEACHING.	R1 - UNDERGRADUATE CERTIFICATE	PASS	1.85	304	16381	PASS	100	304	0	FAIL	N/A	N/A	N/A	N/A	N/A	N/A	16381	15977
056001	ALBANY TECHNICAL COLLEGE	ALBANY	GA	31701-2648	PUBLIC 2 TO 3 YEARS	430104	CRIMINAL JUSTICE/SAFETY STUDIES.	R1 - UNDERGRADUATE CERTIFICATE	PASS	1.51	428	17725	PASS	382.85	268	70	FAIL	N/A	N/A	N/A	N/A	N/A	N/A	17725	17611
056001	ALBANY TECHNICAL COLLEGE	ALBANY	GA	31701-2648	PUBLIC 2 TO 3 YEARS	470201	HEATING, AIR CONDITIONING, VENTILATION AND REFRIGERATION MAINTENANCE TECHNOLOGY/TECHNICIAN.	R1 - UNDERGRADUATE CERTIFICATE	PASS	2.08	480	23052	PASS	8.89	480	5397	PASS	N/A	N/A	N/A	N/A	N/A	N/A	23052	23052
056001	ALBANY TECHNICAL COLLEGE	ALBANY	GA	31701-2648	PUBLIC 2 TO 3 YEARS	470302	HEAVY EQUIPMENT MAINTENANCE TECHNOLOGY/TECHNICIAN.	R1 - UNDERGRADUATE CERTIFICATE	PASS	0.41	138	13388	PASS	0.87	138	15733	PASS	N/A	N/A	N/A	N/A	N/A	N/A	13388	14480
056001	ALBANY TECHNICAL COLLEGE	ALBANY	GA	31701-2648	PUBLIC 2 TO 3 YEARS	470603	AUTOMOBILE/COLLISION AND REPAIR TECHNOLOGY/TECHNICIAN.	R1 - UNDERGRADUATE CERTIFICATE	PASS	4.02	934	23397	PASS	16.85	934	5542	PASS	N/A	N/A	N/A	N/A	N/A	N/A	23397	18932
056001	ALBANY TECHNICAL COLLEGE	ALBANY	GA	31701-2648	PUBLIC 2 TO 3 YEARS	470604	AUTOMOBILE/AUTOMOTIVE MECHANICS TECHNOLOGY/TECHNICIAN.	R1 - UNDERGRADUATE CERTIFICATE	PASS	2.19	504	23004	PASS	9.42	504	5349	PASS	N/A	N/A	N/A	N/A	N/A	N/A	23004	17944
056001	ALBANY TECHNICAL COLLEGE	ALBANY	GA	31701-2648	PUBLIC 2 TO 3 YEARS	480508	WELDING TECHNOLOGY/WELDER.	R1 - UNDERGRADUATE CERTIFICATE	PASS	1.53	405	26133	PASS	4.66	405	8678	PASS	N/A	N/A	N/A	N/A	N/A	N/A	26133	21552
056001	ALBANY TECHNICAL COLLEGE	ALBANY	GA	31701-2648																					

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Institution Code (4- Digit)	Institution Name	City	State	Zip	Institution Type	CIP Code	CIP Name	Credential Level	Official Program Pass/Fail/Zone	Appeal Status	Debt-to-Earnings Ratio	Debt-to-Earnings Annual Rate Numerator	Debt-to-Earnings Annual Rate Denominator	Debt-to-Earnings Annual Rate Pass/Fail/Zone	Debt-to-Earnings Discretionary Income Rate	Debt-to-Earnings Discretionary Income Rate Numerator	Debt-to-Earnings Discretionary Income Rate Denominator	Debt-to-Earnings Transitional Income Rate Pass/Fail/Zone	Debt-to-Earnings Transitional Income Rate Numerator	Debt-to-Earnings Transitional Income Rate Denominator	Debt-to-Earnings Transitional Income Rate Pass/Fail/Zone	Debt-to-Earnings Transitional Income Rate Numerator	Debt-to-Earnings Transitional Income Rate Denominator	Mean Annual Earnings	Median Annual Earnings	
006867	COLUMBUS STATE COMMUNITY COLLEGE	COLUMBUS	DH	432151786	PUBLIC 2 TO 3 YEARS	510902	ELECTROCARDIOGRAPH TECHNOLOGY/TECHNICIAN	RT - UNDERGRADUATE CERTIFICATE	PASS		0.47	116	24309	PASS	1.74	116	6654	PASS	N/A	N/A	N/A	N/A	N/A	N/A	24309	22569
006867	COLUMBUS STATE COMMUNITY COLLEGE	COLUMBUS	DH	432151786	PUBLIC 2 TO 3 YEARS	510904	EMERGENCY MEDICAL TECHNOLOGY/TECHNICIAN (EMT PARAMEDIC)	RT - UNDERGRADUATE CERTIFICATE	PASS		1.29	551	42478	PASS	2.21	551	24823	PASS	N/A	N/A	N/A	N/A	N/A	N/A	42478	39322
006867	COLUMBUS STATE COMMUNITY COLLEGE	COLUMBUS	DH	432151786	PUBLIC 2 TO 3 YEARS	513601	MASSAGE THERAPY/THERAPEUTIC MASSAGE	RT - UNDERGRADUATE CERTIFICATE	PASS		3.02	744	24571	PASS	10.75	744	6916	PASS	N/A	N/A	N/A	N/A	N/A	N/A	22398	24571
006867	COLUMBUS STATE COMMUNITY COLLEGE	COLUMBUS	DH	432151786	PUBLIC 2 TO 3 YEARS	513901	LICENSED PRACTICAL/VOCATIONAL NURSE TRAINING	RT - UNDERGRADUATE CERTIFICATE	PASS		2.51	803	31896	PASS	5.63	803	14241	PASS	N/A	N/A	N/A	N/A	N/A	N/A	31896	31860
006867	COLUMBUS STATE COMMUNITY COLLEGE	COLUMBUS	DH	432151786	PUBLIC 2 TO 3 YEARS	530602	ACCOUNTING TECHNOLOGY/TECHNICIAN AND BOOKKEEPING	RT - UNDERGRADUATE CERTIFICATE	PASS		0.98	365	36873	PASS	1.89	365	19218	PASS	N/A	N/A	N/A	N/A	N/A	N/A	36873	35074
006867	COLUMBUS STATE COMMUNITY COLLEGE	COLUMBUS	DH	432151786	PUBLIC 2 TO 3 YEARS	521009	HUMAN RESOURCES MANAGEMENT AND SERVICES, OTHER	RT - UNDERGRADUATE CERTIFICATE	PASS		0.67	217	32355	PASS	1.47	217	14500	PASS	N/A	N/A	N/A	N/A	N/A	N/A	32355	27767
006867	COLUMBUS STATE COMMUNITY COLLEGE	COLUMBUS	DH	432151786	PUBLIC 2 TO 3 YEARS	521499	MARKETING, OTHER	RT - UNDERGRADUATE CERTIFICATE	PASS		0.84	263	31174	PASS	1.93	263	13759	PASS	N/A	N/A	N/A	N/A	N/A	N/A	31174	28533
006867	COLUMBUS STATE COMMUNITY COLLEGE	COLUMBUS	DH	432151786	PUBLIC 2 TO 3 YEARS	521601	REAL ESTATE	RT - UNDERGRADUATE CERTIFICATE	PASS		0.69	175	25294	PASS	2.29	175	7630	PASS	N/A	N/A	N/A	N/A	N/A	N/A	25294	23236
006867	COLUMBUS STATE COMMUNITY COLLEGE	COLUMBUS	DH	432151786	PUBLIC 2 TO 3 YEARS	521804	SELLING SKILLS AND SALES OPERATIONS	RT - UNDERGRADUATE CERTIFICATE	PASS		0.6	197	32819	PASS	1.29	197	15344	PASS	N/A	N/A	N/A	N/A	N/A	N/A	32819	31248
006938	UNIV-BENTON COMMUNITY COLLEGE	ALBANY	OR	973213774	PUBLIC 2 TO 3 YEARS	510901	DENTAL ASSISTING/ASSISTANT	RT - UNDERGRADUATE CERTIFICATE	PASS		2.1	603	28592	PASS	5.51	603	10897	PASS	N/A	N/A	N/A	N/A	N/A	N/A	28592	28392
006938	UNIV-BENTON COMMUNITY COLLEGE	ALBANY	OR	973213774	PUBLIC 2 TO 3 YEARS	510805	PHARMACY TECHNICIAN/ASSISTANT	RT - UNDERGRADUATE CERTIFICATE	PASS		1.65	441	26712	PASS	4.86	441	9057	PASS	N/A	N/A	N/A	N/A	N/A	N/A	23262	22271
006938	UNIV-BENTON COMMUNITY COLLEGE	ALBANY	OR	973213774	PUBLIC 2 TO 3 YEARS	511001	PHLEBOTOMY TECHNICIAN/PHLEBOTOMIST	RT - UNDERGRADUATE CERTIFICATE	PASS		1.48	401	27082	PASS	4.25	401	9427	PASS	N/A	N/A	N/A	N/A	N/A	N/A	21095	27082
006949	KALAMAZOO VALLEY COMMUNITY COLLEGE	KALAMAZOO	MI	490099065	PUBLIC 2 TO 3 YEARS	510309	ELECTRICAL AND ELECTRONIC ENGINEERING TECHNOLOGIES/TECHNICIANS, OTHER	RT - UNDERGRADUATE CERTIFICATE	PASS		1.79	1136	63278	PASS	2.48	1136	45623	PASS	N/A	N/A	N/A	N/A	N/A	N/A	60155	63278
006949	KALAMAZOO VALLEY COMMUNITY COLLEGE	KALAMAZOO	MI	490099065	PUBLIC 2 TO 3 YEARS	513907	CRIMINAL JUSTICE/POLICE SCIENCE	RT - UNDERGRADUATE CERTIFICATE	PASS		1.49	821	54959	PASS	2.2	821	37298	PASS	N/A	N/A	N/A	N/A	N/A	N/A	49620	54959
006949	KALAMAZOO VALLEY COMMUNITY COLLEGE	KALAMAZOO	MI	490099065	PUBLIC 2 TO 3 YEARS	513901	LICENSED PRACTICAL/VOCATIONAL NURSE TRAINING	RT - UNDERGRADUATE CERTIFICATE	PASS		0.67	310	46029	PASS	1.09	310	28374	PASS	N/A	N/A	N/A	N/A	N/A	N/A	46029	44093
006960	MAVSVILLE COMMUNITY AND TECHNICAL COLLEGE	MAVSVILLE	KY	410568910	PUBLIC 2 TO 3 YEARS	510801	MEDICAL CLINICAL ASSISTANT	RT - UNDERGRADUATE CERTIFICATE	PASS		1.5	293	19441	PASS	16.4	293	17868	P								

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Institution Code (4- Digit FIPS)	Institution Name	City	State	Zip	Institution Type	CIP Code	CIP Name	Credential Level	Official Program Pass/Fail/Zone	Appeal Status	Debt-to-Earnings Annual Rate	Debt-to-Earnings Annual Rate Numerator	Debt-to-Earnings Annual Rate Denominator	Debt-to-Earnings Annual Rate Pass/Fail/Zone	Debt-to-Earnings Discretionary Income Rate	Debt-to-Earnings Discretionary Income Rate Numerator	Debt-to-Earnings Discretionary Income Rate Denominator	Debt-to-Earnings Discretionary Income Rate Pass/Fail/Zone	Debt-to-Earnings Transitional Rate	Debt-to-Earnings Transitional Rate Numerator	Debt-to-Earnings Transitional Rate Denominator	Debt-to-Earnings Transitional Income Rate Pass/Fail/Zone	Debt-to-Earnings Transitional Income Rate Numerator	Debt-to-Earnings Transitional Income Rate Denominator	Debt-to-Earnings Transitional Income Rate Pass/Fail/Zone	Mean Annual Earnings	Median Annual Earnings	
07921	PAUL MITCHELL THE SCHOOL, ARKANSAS	FAYETTEVILLE	AR	72703518	PROPRIETARY LESS THAN 2 YEARS	120401	COSMETOLOGY/COSMETOLOGIST, GENERAL	01- UNDERGRADUATE CERTIFICATE	ZONE A	PASS	8.88	1357	15266	ZONE	100	1357	0	FAIL	8.77	1339	15266	ZONE	100	1339	0	FAIL	15266	13459
07930	CONCORDE CARER COLLEGE	SAN DIEGO	CA	92113192	PROPRIETARY 2 TO 3 YEARS	53061	DENTAL ASSISTING/ASSISTANT	01- UNDERGRADUATE CERTIFICATE	PASS	PASS	7.49	1306	17418	PASS	100	1306	0	FAIL	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	15654	17418
07930	CONCORDE CARER COLLEGE	SAN DIEGO	CA	92113192	PROPRIETARY 2 TO 3 YEARS	530710	MEDICAL OFFICE ASSISTANT/SPECIALIST	01- UNDERGRADUATE CERTIFICATE	PASS	PASS	6.53	1278	19411	PASS	72.2	1278	1756	PASS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	19411	19780
07990	CONCORDE CARER COLLEGE	SAN DIEGO	CA	92113192	PROPRIETARY 2 TO 3 YEARS	53081	MEDICAL/CLINICAL ASSISTANT	01- UNDERGRADUATE CERTIFICATE	PASS	PASS	6.91	1279	18508	PASS	153.36	1279	845	FAIL	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	18508	18278
07990	CONCORDE CARER COLLEGE	SAN DIEGO	CA	92113192	PROPRIETARY 2 TO 3 YEARS	530918	RESPIRATORY CARE THERAPY/THERAPIST	00- ASSOCIATES DEGREE	PASS	PASS	9.11	3121	34128	ZONE	18.82	3121	16818	PASS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	34128	30248
07990	CONCORDE CARER COLLEGE	SAN DIEGO	CA	92113192	PROPRIETARY 2 TO 3 YEARS	530909	SURGICAL TECHNOLOGY/TECHNOLOGIST	01- UNDERGRADUATE CERTIFICATE	PASS	PASS	7.61	2267	29771	PASS	18.71	2267	12116	PASS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	29771	27600
07990	CONCORDE CARER COLLEGE	SAN DIEGO	CA	92113192	PROPRIETARY 2 TO 3 YEARS	531901	LICENSED PRACTICAL/VOCATIONAL NURSE TRAINING	01- UNDERGRADUATE CERTIFICATE	PASS	PASS	5.66	2186	38603	PASS	10.43	2186	20048	PASS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	38603	36787
07931	FRONT RANGE COMMUNITY COLLEGE	WESTMINSTER	CO	80512129	PUBLIC 2 TO 3 YEARS	530710	MEDICAL OFFICE ASSISTANT/SPECIALIST	01- UNDERGRADUATE CERTIFICATE	PASS	PASS	1.69	484	28560	PASS	4.43	484	10965	PASS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	29151	28560
07931	FRONT RANGE COMMUNITY COLLEGE	WESTMINSTER	CO	80512129	PUBLIC 2 TO 3 YEARS	530815	PHARMACY TECHNICIAN/ASSISTANT	01- UNDERGRADUATE CERTIFICATE	PASS	PASS	1.64	393	23854	PASS	6.33	393	6199	PASS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	22149	23854
07931	FRONT RANGE COMMUNITY COLLEGE	WESTMINSTER	CO	80512129	PUBLIC 2 TO 3 YEARS	533901	LICENSED PRACTICAL/VOCATIONAL NURSE TRAINING	01- UNDERGRADUATE CERTIFICATE	PASS	PASS	1.56	445	41332	PASS	2.72	445	23677	PASS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	39303	41332
07936	UNCOLA COLLEGE OF TECHNOLOGY	COLUMBIA	MO	21661544	PROPRIETARY 2 TO 3 YEARS	120503	CULINARY ARTS/CHEF TRAINING	01- UNDERGRADUATE CERTIFICATE	ZONE	FAIL	8.85	2095	23669	ZONE	34.83	2095	6014	FAIL	8.48	2008	23669	ZONE	33.38	2008	6014	FAIL	23669	21059
07936	UNCOLA COLLEGE OF TECHNOLOGY	COLUMBIA	MO	21661544	PROPRIETARY 2 TO 3 YEARS	120503	HEATING, VENTILATING, AIR CONDITIONING AND REFRIGERATION ENGINEERING TECHNOLOGY/TECHNICIAN	01- UNDERGRADUATE CERTIFICATE	PASS	PASS	6.54	1803	27557	PASS	18.2	1803	9902	PASS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	27557	25905
07936	UNCOLA COLLEGE OF TECHNOLOGY	COLUMBIA	MO	21661544	PROPRIETARY 2 TO 3 YEARS	470601	ELECTRICAL/ELECTRONICS EQUIPMENT INSTALLATION AND REPAIR, GENERAL	01- UNDERGRADUATE CERTIFICATE	PASS	PASS	5.98	1328	22179	PASS	29.35	1328	4524	ZONE	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	22179	23038
07936	UNCOLA COLLEGE OF TECHNOLOGY	COLUMBIA	MO	21661544	PROPRIETARY 2 TO 3 YEARS	470604	AUTOMOBILE/AUTOMOTIVE MECHANICS TECHNOLOGY/TECHNICIAN	01- UNDERGRADUATE CERTIFICATE	ZONE	FAIL	8.56	22173	26548	ZONE	25.55	2273	8893	ZONE	8.95	2217	26548	ZONE	24.92	2217	8893	ZONE	26548</	

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01046	CENTRAL OHIO TECHNICAL COLLEGE	NEWARK	OH	43051767	PUBLIC 2 TO 3 YEARS	513901	LICENSED PRACTICAL/VOCATIONAL NURSE TRAINING	01 - UNDERGRADUATE CERTIFICATE	PASS		3.02	909	30007	PASS	7.3	909	12462	PASS	N/A	N/A	N/A	N/A	N/A	29467	30097		
01074	BAINBRIDGE STATE COLLEGE	BAINBRIDGE	SA	29818600	PUBLIC 4 YEARS OR MORE	510716	MEDICAL ASSISTANT/EXECUTIVE ASSISTANT AND MEDICAL SECRETARY	01 - UNDERGRADUATE CERTIFICATE	PASS		3.28	538	16396	PASS	5.0	539	0	FAIL	N/A	N/A	N/A	N/A	N/A	16396	15306		
01074	BAINBRIDGE STATE COLLEGE	BAINBRIDGE	SA	29818600	PUBLIC 4 YEARS OR MORE	513901	LICENSED PRACTICAL/VOCATIONAL NURSE TRAINING	01 - UNDERGRADUATE CERTIFICATE	PASS		3.5	919	26215	PASS	10.73	919	8560	PASS	N/A	N/A	N/A	N/A	N/A	25838	26215		
01098	ELERT INSTITUTE OF BARBERING	ELMHT	MI	48054095	PROPRIETARY 2 TO 3 YEARS	130402	BARBERING/BARBER	01 - UNDERGRADUATE CERTIFICATE	FAIL		15.79	989	6260	FAIL	100	989	0	FAIL	17.5	1096	6260	FAIL	1006	0	FAIL	6260	82
011112	FASHION INSTITUTE OF DESIGN & MERCHANDISING	LOS ANGELES	CA	900151421	PROPRIETARY 4 YEARS OR MORE	139005	APPAREL AND TEXTILE MARKETING MANAGEMENT	02 - ASSOCIATES DEGREE	PASS		5.85	1906	32566	PASS	12.78	1906	14911	PASS	N/A	N/A	N/A	N/A	N/A	N/A	32123	32566	
011112	FASHION INSTITUTE OF DESIGN & MERCHANDISING	LOS ANGELES	CA	900151421	PROPRIETARY 4 YEARS OR MORE	100401	DESIGN AND VISUAL COMMUNICATIONS, GENERAL	02 - ASSOCIATES DEGREE	PASS		6.09	1657	27373	PASS	17.4	1657	9518	PASS	N/A	N/A	N/A	N/A	N/A	N/A	27373	26262	
011112	FASHION INSTITUTE OF DESIGN & MERCHANDISING	LOS ANGELES	CA	900151421	PROPRIETARY 4 YEARS OR MORE	100467	FASHION/APPAREL DESIGN	02 - ASSOCIATES DEGREE	PASS		6.05	1657	27346	PASS	17.09	1657	9601	PASS	N/A	N/A	N/A	N/A	N/A	N/A	27346	25467	
011112	FASHION INSTITUTE OF DESIGN & MERCHANDISING	LOS ANGELES	CA	900151421	PROPRIETARY 4 YEARS OR MORE	100408	INTERIOR DESIGN	02 - ASSOCIATES DEGREE	PASS		5.41	1840	33973	PASS	11.27	1840	16318	PASS	N/A	N/A	N/A	N/A	N/A	N/A	32940	33973	
011112	FASHION INSTITUTE OF DESIGN & MERCHANDISING	LOS ANGELES	CA	900151421	PROPRIETARY 4 YEARS OR MORE	500409	GRAPHIC DESIGN	02 - ASSOCIATES DEGREE	PASS		5.23	1657	31672	PASS	11.82	1657	14027	PASS	N/A	N/A	N/A	N/A	N/A	N/A	31672	31690	
011112	FASHION INSTITUTE OF DESIGN & MERCHANDISING	LOS ANGELES	CA	900151421	PROPRIETARY 4 YEARS OR MORE	500510	COSTUME DESIGN	02 - ASSOCIATES DEGREE	PASS		3.77	1035	27438	PASS	10.57	1035	9783	PASS	N/A	N/A	N/A	N/A	N/A	N/A	27438	25291	
011112	FASHION INSTITUTE OF DESIGN & MERCHANDISING	LOS ANGELES	CA	900151421	PROPRIETARY 4 YEARS OR MORE	500602	CINEMATOGRAPHY AND FILM/VIDEO PRODUCTION	02 - ASSOCIATES DEGREE	PASS		4.82	1741	36006	PASS	9.44	1741	18441	PASS	N/A	N/A	N/A	N/A	N/A	N/A	36006	33364	
011112	FASHION INSTITUTE OF DESIGN & MERCHANDISING	LOS ANGELES	CA	900151421	PROPRIETARY 4 YEARS OR MORE	500713	METAL AND JEWELRY ARTS	02 - ASSOCIATES DEGREE	PASS		6.5	1707	26230	PASS	19.5	1707	8575	PASS	N/A	N/A	N/A	N/A	N/A	N/A	26230	25676	
011112	FASHION INSTITUTE OF DESIGN & MERCHANDISING	LOS ANGELES	CA	900151421	PROPRIETARY 4 YEARS OR MORE	512902	FASHION MERCHANDISING	02 - ASSOCIATES DEGREE	PASS		5.17	1657	32033	PASS	11.52	1657	14378	PASS	N/A	N/A	N/A	N/A	N/A	N/A	32033	31293	
011112	FASHION INSTITUTE OF DESIGN & MERCHANDISING	LOS ANGELES	CA	900151421	PROPRIETARY 4 YEARS OR MORE	512999	BUSINESS, MANAGEMENT, MARKETING, AND RELATED SUPPORT SERVICES, STUDIES	01 - BACHELORS DEGREE	PASS		7.78	2876	36932	PASS	14.92	2876	19205	PASS	N/A	N/A	N/A	N/A	N/A	N/A	36932	36072	
011117	ALLIANT INTERNATIONAL UNIVERSITY	SAN DIEGO	CA	921311799	PROPRIETARY 4 YEARS OR MORE	131289	TEACHER EDUCATION AND PROFESSIONAL DEVELOPMENT, SPECIFIC LEVELS AND METHODS, OTHER	05 - MASTERS DEGREE	PASS		3.93	2014	51185	PASS	6	2014	33530	PASS	N/A	N/A	N/A	N/A	N/A	N/A	51185	50900	
011117	ALLIANT INTERNATIONAL UNIVERSITY	SAN DIEGO	CA	921311799	PROPRIETARY 4 YEARS OR MORE	422709	PSYCHOPHARMACOLOGY	05 - MASTERS DEGREE	PASS		1.35	1238	91108														

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Institution Code (Six-Digit CEPIS)	Institution Name	City	State	Zip	Institution Type	CEP Code	CEP Name	Credential Level	Official Program Pass/Fail/Zone	Appeal Status	Debt-to-Earnings Annual Rate	Debt-to-Earnings Annual Rate Numerator	Debt-to-Earnings Annual Rate Denominator	Debt-to-Earnings Annual Rate Pass/Fail/Zone	Debt-to-Earnings Discretionary Income Rate	Debt-to-Earnings Discretionary Income Rate Numerator	Debt-to-Earnings Discretionary Income Rate Denominator	Debt-to-Earnings Transitional Rate	Debt-to-Earnings Transitional Rate Numerator	Debt-to-Earnings Transitional Rate Denominator	Debt-to-Earnings Transitional Income Rate	Debt-to-Earnings Transitional Income Rate Numerator	Debt-to-Earnings Transitional Income Rate Denominator	Mean Annual Earnings	Median Annual Earnings			
12261	ATLANTIC TECHNICAL COLLEGE	COCONUT CREEK	FL	330633902	PUBLIC 2 TO 3 YEARS	530707	HEALTH INFORMATION/MEDICAL RECORDS TECHNOLOGY/TECHNICIAN	01- UNDERGRADUATE CERTIFICATE	PASS	0	0	23993	PASS	0	0	6338	PASS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	22714	23993		
12263	ATLANTIC TECHNICAL COLLEGE	COCONUT CREEK	FL	330633902	PUBLIC 2 TO 3 YEARS	530101	RNA/DNA/GENE TECHNOLOGY/TECHNICIAN	01- UNDERGRADUATE CERTIFICATE	PASS	0	0	24107	PASS	0	0	6542	PASS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	23943	24107		
12263	ATLANTIC TECHNICAL COLLEGE	COCONUT CREEK	FL	330633902	PUBLIC 2 TO 3 YEARS	530601	LICENSED PRACTICAL/VOCATIONAL NURSE TRAINING	01- UNDERGRADUATE CERTIFICATE	PASS	0	0	33883	PASS	0	0	14238	PASS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	31623	33883		
12263	ATLANTIC TECHNICAL COLLEGE	COCONUT CREEK	FL	330633902	PUBLIC 2 TO 3 YEARS	530602	NURSING ASSISTANT/AIDE AND PATIENT CARE ASSISTANT/AIDE	01- UNDERGRADUATE CERTIFICATE	PASS	0	0	15452	PASS	0	0	0	PASS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	15452	14524		
12263	ATLANTIC TECHNICAL COLLEGE	COCONUT CREEK	FL	330633902	PUBLIC 2 TO 3 YEARS	320302	COMPUTER TECHNOLOGY/TECHNICIAN AND BOOKKEEPERS	01- UNDERGRADUATE CERTIFICATE	PASS	0	0	16742	PASS	0	0	0	PASS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	16742	17303		
12268	BALDWIN BEAUTY SCHOOLS	AUSTIN	TX	78704785	2 YEARS	120401	COSMETOLOGY/COSMETOLOGIST, GENERAL	01- UNDERGRADUATE CERTIFICATE	PASS	0	0	18908	PASS	0	0	1253	PASS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	17748	18908		
12272	MODER NORDMAN TECHNOLOGY CENTER SCHOOL DISTRICT NO. 17	NORMAN	DE	726080889	PUBLIC 2 TO 3 YEARS	530609	CURRICULAR TECHNOLOGY/TECHNOLOGIST	01- UNDERGRADUATE CERTIFICATE	PASS	0	0	33607	PASS	0	0	15952	PASS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	31305	33607		
12272	MODER NORDMAN TECHNOLOGY CENTER SCHOOL DISTRICT NO. 17	NORMAN	DE	726080889	PUBLIC 2 TO 3 YEARS	530601	LICENSED PRACTICAL/VOCATIONAL NURSE TRAINING	01- UNDERGRADUATE CERTIFICATE	PASS	0	0	43396	PASS	0	0	24743	PASS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	41817	43396		
12291	WRIGHT BEAUTY ACADEMY	BATTLE CREEK	MI	49015206	PUBLIC LESS THAN 2 YEARS	120401	CEP/MT/CELOLOGY/COSMETOLOGIST, GENERAL	01- UNDERGRADUATE CERTIFICATE	PASS	0	0	15426	PASS	0	0	0	PASS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	15426	2536		
12323	VEER NASSAU COUNTY SCHOOL OF PRACTICAL NURSING	HICKSVILLE	NY	118014302	PUBLIC 2 TO 3 YEARS	530601	LICENSED PRACTICAL/VOCATIONAL NURSE TRAINING	01- UNDERGRADUATE CERTIFICATE	PASS	2.45	1035	42123	PASS	4.23	1033	24468	PASS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	40863	42123		
12295	IZ TRENO ACADEMY PART M. MITCHELL PARTNER SCHOOL	ESMARNOK	NO	58040001	PUBLIC 2 TO 3 YEARS	120401	COSMETOLOGY/COSMETOLOGIST, GENERAL	01- UNDERGRADUATE CERTIFICATE	PASS	7.5	1822	24133	PASS	27.97	1812	6478	ZONE	N/A	N/A	N/A	N/A	N/A	N/A	21927	24133			
12309	UNIVERSITY OF WESTERN STATES	PORTLAND	DE	97203009	PRIVATE, NOT FOR PROFIT 4 YEARS OR MORE	530601	MASSAGE THERAPY/THERAPEUTIC MASSAGE	01- UNDERGRADUATE CERTIFICATE	PASS	6.17	1062	26775	PASS	18.13	1054	9219	PASS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	26775	17806		
12328	NORTHWESTERN HEALTH SCIENCES UNIVERSITY	BLOOMINGTON	MA	55411559	PRIVATE, NOT FOR PROFIT 4 YEARS OR MORE	530601	MASSAGE THERAPY/THERAPEUTIC MASSAGE	01- UNDERGRADUATE CERTIFICATE	PASS	3.54	941	26050	PASS	10.57	941	8895	PASS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	26550	26478		
12347	PHAGANS' CENTRAL ORION BEAUTY COLLEGE	REND	DE	977015175	PUBLIC 2 TO 3 YEARS	120401	CEP/MT/CELOLOGY/COSMETOLOGIST, GENERAL	01- UNDERGRADUATE CERTIFICATE	FAIL	N/A	18.5	2355	15846	FAIL	100	2155	0	FAIL	14.22	1657	15846	FAIL	100	1057	0	FAIL	15846	15906
12347	PHAGANS' CENTRAL ORION BEAUTY COLLEGE	REND	DE	977015175	PUBLIC 2 TO 3 YEARS	120407	HAIR STYLING/STYLIST AND HAIR DESIGN	01- UNDERGRADUATE CERTIFICATE	ZONE	11.72	1248	13199	ZONE	100	1548	0	FAIL	N/A	N/A	N/A	N/A	N/A	N/A	13199	13996			
12347	PHAGANS' CENTRAL ORION BEAUTY COLLEGE	REND	DE	977015175	PUBLIC 2 TO 3 YEARS	120409	COSMETOLOGY AND RELATED PERSONAL GROOMING ARTS, OTHER	01- UNDERGRADUATE CERTIFICATE	FAIL	7.72	1233	15703	PASS															

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Institution Code (State-4 digit OFED)	Institution Name	City	State	Zip	IP Institution Type	CIP Code	CIP Name	Credential Level	Official Program Pmtz/Full Time	Appeal Status	Debt-to-Earnings	Debt-to-Earnings	Debt-to-Earnings	Debt-to-Earnings	Debt-to-Earnings	Debt-to-Earnings	Debt-to-Earnings	Debt-to-Earnings	Debt-to-Earnings	Debt-to-Earnings	Mean Annual Earnings	Median Annual Earnings						
											Annual Rate	Annual Rate Numerator	Annual Rate Denominator	Annual Rate Pmtz/Full Time	Annual Rate Denominator	Annual Rate Numerator	Annual Rate Denominator	Annual Rate Numerator	Annual Rate Denominator	Annual Rate Numerator			Annual Rate Denominator	Annual Rate Numerator	Annual Rate Denominator	Annual Rate Numerator	Annual Rate Denominator	Annual Rate Numerator
022608	HUERTAS COLLEGE	CAGUAS	PR	00726000	PROPRIETARY 4 YEARS OR MORE	130509	HEALTH AND PHYSICAL EDUCATION/FITNESS, OTHER	01- UNDERGRADUATE CERTIFICATE	PASS		0	0	12397	PASS	0	0	0	PASS	N/A	N/A	N/A	N/A	12397	6498				
022608	HUERTAS COLLEGE	CAGUAS	PR	00726000	PROPRIETARY 4 YEARS OR MORE	170504	COMPUTER INSTALLATION AND REPAIR TECHNOLOGIST/TECHNICIAN	01- UNDERGRADUATE CERTIFICATE	PASS		0	0	8575	PASS	0	0	0	PASS	N/A	N/A	N/A	N/A	8575	6080				
022608	HUERTAS COLLEGE	CAGUAS	PR	00726000	PROPRIETARY 4 YEARS OR MORE	500409	GRAPHIC DESIGN	02- ASSOCIATES DEGREE	PASS		0	0	7439	PASS	0	0	0	PASS	N/A	N/A	N/A	N/A	7439	4785				
022608	HUERTAS COLLEGE	CAGUAS	PR	00726000	PROPRIETARY 4 YEARS OR MORE	510601	DENTAL ASSISTING/ASSISTANT	01- ASSOCIATES DEGREE	PASS		0	0	10589	PASS	0	0	0	PASS	N/A	N/A	N/A	N/A	10589	10389				
022608	HUERTAS COLLEGE	CAGUAS	PR	00726000	PROPRIETARY 4 YEARS OR MORE	510707	HEALTH INFORMATION/MEDICAL RECORDS TECHNOLOGY/TECHNICIAN	02- ASSOCIATES DEGREE	PASS		0	0	14643	PASS	0	0	0	PASS	N/A	N/A	N/A	N/A	14643	15593				
022608	HUERTAS COLLEGE	CAGUAS	PR	00726000	PROPRIETARY 4 YEARS OR MORE	510805	PHARMACY TECHNICIAN/ASSISTANT	02- ASSOCIATES DEGREE	PASS		0	0	14055	PASS	0	0	0	PASS	N/A	N/A	N/A	N/A	13705	14051				
022608	HUERTAS COLLEGE	CAGUAS	PR	00726000	PROPRIETARY 4 YEARS OR MORE	510908	RESPIRATORY CARE THERAPIST/THERAPIST	02- ASSOCIATES DEGREE	PASS		0	0	9084	PASS	0	0	0	PASS	N/A	N/A	N/A	N/A	9184	11471				
022608	HUERTAS COLLEGE	CAGUAS	PR	00726000	PROPRIETARY 4 YEARS OR MORE	513001	MASSAGE THERAPY/THERAPEUTIC MASSAGE	01- UNDERGRADUATE CERTIFICATE	PASS		0	0	7574	PASS	0	0	0	PASS	N/A	N/A	N/A	N/A	7574	6493				
022608	HUERTAS COLLEGE	CAGUAS	PR	00726000	PROPRIETARY 4 YEARS OR MORE	520201	BUSINESS ADMINISTRATION/MANAGEMENT, GENERAL	01- ASSOCIATES DEGREE	PASS		0	0	18074	PASS	0	0	0	410	PASS	N/A	N/A	N/A	N/A	18074	14571			
022608	HUERTAS COLLEGE	CAGUAS	PR	00726000	PROPRIETARY 4 YEARS OR MORE	520302	ACCOUNTING TECHNOLOGY/TECHNICIAN AND BOOKKEEPING	02- ASSOCIATES DEGREE	PASS		0	0	14211	PASS	0	0	0	PASS	N/A	N/A	N/A	N/A	13474	14211				
022608	HUERTAS COLLEGE	CAGUAS	PR	00726000	PROPRIETARY 4 YEARS OR MORE	520401	ADMINISTRATIVE ASSISTANT AND SECRETARIAL SCIENCE, GENERAL	01- ASSOCIATES DEGREE	PASS		0	0	9583	PASS	0	0	0	PASS	N/A	N/A	N/A	N/A	9486	5381				
022612	HART PROFESSIONALS ACADEMY OF COSMETOLOGY	WEST DUNDEE	IL	60118933	PROPRIETARY 2 TO 3 YEARS	120401	COSMETOLOGY/COSMETOLOGIST, GENERAL	01- UNDERGRADUATE CERTIFICATE	PASS		8.03	1311	16323	ZONE	100	1311	0	7.44	1215	16323	PASS	100	1215	0	FAIL	16323	14771	
022613	HART PROFESSIONALS ACADEMY OF COSMETOLOGY	WEST DUNDEE	IL	60118933	PROPRIETARY 2 TO 3 YEARS	120409	AESTHETICIAN/ESTHETICIAN AND SKIN CARE SPECIALIST	01- UNDERGRADUATE CERTIFICATE	PASS		4.03	874	23455	PASS	21.87	874	3996	ZONE	N/A	N/A	N/A	N/A	N/A	N/A	21853	18473		
022613	EVEREST INSTITUTE	SAN ANTONIO	TX	78213984	PROPRIETARY LESS THAN 2 YEARS	510501	HEATING, VENTILATION, AIR CONDITIONING AND REFRIGERATION ENGINEERING TECHNOLOGY/TECHNICIAN	01- UNDERGRADUATE CERTIFICATE	PASS		7.04	1886	26759	PASS	20.71	1886	9504	ZONE	N/A	N/A	N/A	N/A	N/A	N/A	20759	23261		
022613	EVEREST INSTITUTE	SAN ANTONIO	TX	78213984	PROPRIETARY LESS THAN 2 YEARS	510601	DENTAL ASSISTING/ASSISTANT	01- UNDERGRADUATE CERTIFICATE	ZONE		9.49	1520	16055	ZONE	100	1520	0	FAIL	8.18	1311	16055	ZONE	100	1311	0	FAIL	16055	12005
022613	EVEREST INSTITUTE	SAN ANTONIO	TX	78213984	PROPRIETARY LESS THAN 2 YEARS	510713	MEDICAL JOURNAL CODING SPECIALIST/CODER	01- UNDERGRADUATE CERTIFICATE	ZONE		8.7	1467	16848	ZONE	100	1467	0	FAIL	7.78	1311	16848	PASS	100	1311	0	FAIL	16848	16000
022613	EVEREST INSTITUTE	SAN ANTONIO																										

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022788	SOUTHERN TECHNICAL COLLEGE	PORT MYERS	FL	339071157	PROPRIETARY 4 YEARS OR MORE	510801	MEDICAL/CALLICAL ASSISTANT.	02 - ASSOCIATES DEGREE	ZONE		8.93	1840	20683	ZONE	62.84	1840	2928	FAIL	6.19	1687	20583	ZONE	17,611	20,583				
027196	CONTIVE INSTITUTE - FLORIDA	MIAMI LAKES	FL	331763634	PROPRIETARY LESS THAN 2 YEARS	513501	MESSAGE THERAPY/THERAPEUTIC MASSAGE	01 - UNDERGRADUATE CERTIFICATE	PASS		8.06	1311	16265	ZONE	100	1311	0	FAIL	6.72	1093	16261	PASS	1087	1,406				
022805	CHARLES OF ITALY BEAUTY COLLEGE	LAKE HAVASU CITY	AZ	864035750	PROPRIETARY 2 TO 3 YEARS	120401	COSMETOLOGY/COSMETOLOGIST, GENERAL	01 - UNDERGRADUATE CERTIFICATE	PASS		5.85	759	12966	PASS	100	759	0	FAIL	N/A	N/A	N/A	N/A	N/A	12,966	13,438			
022865	CHARLES OF ITALY BEAUTY COLLEGE	LAKE HAVASU CITY	AZ	864035750	PROPRIETARY 2 TO 3 YEARS	513505	MESSAGE THERAPY/THERAPEUTIC MASSAGE	01 - UNDERGRADUATE CERTIFICATE	ZONE		8.11	1039	12966	ZONE	100	1039	0	FAIL	N/A	N/A	N/A	N/A	N/A	12,966	8576			
022881	HIGH PLAINS TECHNOLOGY CENTER, SCHOOL DISTRICT NO. 24	WADSWORTH	OK	730837000	PROPRIETARY LESS THAN 2 YEARS	130915	LICENSED PRACTICAL/VOCATIONAL NURSE TRAINING	01 - UNDERGRADUATE CERTIFICATE	PASS		0	29665	PASS	0	0	12030	PASS	N/A	N/A	N/A	N/A	N/A	2,7327	29,665				
022823	ALHAMBRA BEAUTY COLLEGE	ALHAMBRA	CA	918017484	PROPRIETARY LESS THAN 2 YEARS	120401	COSMETOLOGY/COSMETOLOGIST, GENERAL	01 - UNDERGRADUATE CERTIFICATE	PASS		0.17	18	10446	PASS	100	18	0	FAIL	N/A	N/A	N/A	N/A	N/A	10,446	8073			
022823	ALHAMBRA BEAUTY COLLEGE	ALHAMBRA	CA	918017484	PROPRIETARY LESS THAN 2 YEARS	230409	ASTHETICIAN/ESTHETICIAN AND SKIN CARE SPECIALIST	01 - UNDERGRADUATE CERTIFICATE	PASS		0.1	15	13806	PASS	100	15	0	FAIL	N/A	N/A	N/A	N/A	N/A	13,806	10,000			
022828	LENAPE TECHNICAL SCHOOL	INDO CITY	PA	162261638	PROPRIETARY LESS THAN 2 YEARS	513801	LICENSED PRACTICAL/VOCATIONAL NURSE TRAINING	01 - UNDERGRADUATE CERTIFICATE	PASS		4.36	1590	36453	PASS	8.46	1590	18797	PASS	N/A	N/A	N/A	N/A	N/A	13,427	36,453			
022838	BEAUTY SCHOOLS OF AMERICA	HALEAH	FL	330123322	PROPRIETARY LESS THAN 2 YEARS	120401	COSMETOLOGY/COSMETOLOGIST, GENERAL	01 - UNDERGRADUATE CERTIFICATE	FAIL	A	12.23	1311	10737	FAIL	100	1311	0	FAIL	12.23	1311	10737	FAIL	100	10737	0	FAIL	10737	0
022838	BEAUTY SCHOOLS OF AMERICA	HALEAH	FL	330123322	PROPRIETARY LESS THAN 2 YEARS	230402	BARBERING/BARBER	01 - UNDERGRADUATE CERTIFICATE	FAIL	A	13.78	1311	9512	FAIL	100	1311	0	FAIL	13.78	1311	9512	FAIL	100	1311	0	FAIL	9512	2091
022838	BEAUTY SCHOOLS OF AMERICA	HALEAH	FL	330123322	PROPRIETARY LESS THAN 2 YEARS	230409	ASTHETICIAN/ESTHETICIAN AND SKIN CARE SPECIALIST	01 - UNDERGRADUATE CERTIFICATE	ZONE		9.5	1311	13799	ZONE	100	1311	0	FAIL	9.5	1311	13799	ZONE	100	1311	0	FAIL	13799	10,644
022838	BEAUTY SCHOOLS OF AMERICA	HALEAH	FL	330123322	PROPRIETARY LESS THAN 2 YEARS	513501	MESSAGE THERAPY/THERAPEUTIC MASSAGE	01 - UNDERGRADUATE CERTIFICATE	FAIL	A	5.48	951	16611	PASS	100	951	0	FAIL	N/A	N/A	N/A	N/A	N/A	16,611	14,086			
022842	NEW TYLER BARBER COLLEGE	NORTH LITTLE ROCK	AR	721144073	PROPRIETARY LESS THAN 2 YEARS	230402	BARBERING/BARBER	01 - UNDERGRADUATE CERTIFICATE	FAIL	A	14.39	1311	9305	FAIL	100	1311	0	FAIL	14.39	1311	9305	FAIL	100	1311	0	FAIL	9305	1373
022843	INTERACTIVE COLLEGE OF TECHNOLOGY	CHAMBLEE	GA	303412818	PROPRIETARY 2 TO 3 YEARS	110305	COMPUTER AND INFORMATION SCIENCES, GENERAL	01 - UNDERGRADUATE CERTIFICATE	PASS		2.52	467	18531	PASS	93.31	467	876	FAIL	N/A	N/A	N/A	N/A	N/A	18,531	14,067			
022843	INTERACTIVE COLLEGE OF TECHNOLOGY	CHAMBLEE	GA	303412818	PROPRIETARY 2 TO 3 YEARS	230305	ENGLISH LANGUAGE AND LITERATURE, GENERAL	01 - UNDERGRADUATE CERTIFICATE	PASS		0	0	15647	PASS	0	0	0	PASS	N/A	N/A	N/A	N/A	N/A	15,647	19,032			
022843																												

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02-0858	FLORIDA CAREER COLLEGE	MIAMI	FL	331742521	PRIORITARY 2 TO 3 YEARS	512201	COMPUTER ENGINEERING TECHNOLOGY/TECHNICIAN	02 - ASSOCIATE'S DEGREE	FAIL		16.69	3996	23940	FAIL	63.57	3996	3285	FAIL	N/A	N/A	N/A	23940	23269
02-0858	FLORIDA CAREER COLLEGE	MIAMI	FL	331742521	PRIORITARY 2 TO 3 YEARS	515202	COMPUTER TECHNOLOGY/COMPUTER SYSTEMS TECHNOLOGICAL	01 - UNDERGRADUATE CERTIFICATE	FAIL		7.68	1680	21929	PASS	49.78	1680	3374	FAIL	N/A	N/A	N/A	21929	16328
02-0858	FLORIDA CAREER COLLEGE	MIAMI	FL	331742523	PRIORITARY 2 TO 3 YEARS	470104	COMPUTER INSTALLATION AND REPAIR TECHNOLOGY/TECHNICIAN	01 - UNDERGRADUATE CERTIFICATE	ZONE		9.56	1649	17247	ZONE	100	1649	0	FAIL	N/A	N/A	N/A	17247	16077
02-0858	FLORIDA CAREER COLLEGE	MIAMI	FL	331742521	PRIORITARY 2 TO 3 YEARS	510737	HEALTH INFORMATION/MEDICAL RECORDS TECHNOLOGY/TECHNICIAN	01 - BACHELORS DEGREE	FAIL		19.73	5033	25498	FAIL	64.17	5033	7843	FAIL	N/A	N/A	N/A	25498	23235
02-0858	FLORIDA CAREER COLLEGE	MIAMI	FL	331742523	PRIORITARY 2 TO 3 YEARS	510714	MEDICAL INSURANCE SPECIALIST/MEDICAL BILLER	01 - UNDERGRADUATE CERTIFICATE	ZONE		9.98	1914	19162	ZONE	127	1914	1507	FAIL	11.85	2271	19162	ZONE	150.69
02-0858	FLORIDA CAREER COLLEGE	MIAMI	FL	331742521	PRIORITARY 2 TO 3 YEARS	510716	MEDICAL ADMINISTRATIVE/EXECUTIVE ASSISTANT AND MEDICAL SECRETARY	02 - ASSOCIATE'S DEGREE	FAIL		18.08	3779	20894	FAIL	116.67	3779	3239	FAIL	N/A	N/A	N/A	N/A	19231
02-0858	FLORIDA CAREER COLLEGE	MIAMI	FL	331742521	PRIORITARY 2 TO 3 YEARS	510801	MEDICAL/CLINICAL ASSTANT.	01 - UNDERGRADUATE CERTIFICATE	ZONE		10.76	1792	16654	ZONE	1792	0	FALL	12.85	2141	16654	FAIL	100	
02-0858	FLORIDA CAREER COLLEGE	MIAMI	FL	331742521	PRIORITARY 2 TO 3 YEARS	513901	MESSAGE THERAPY/THERAPEUTIC MASSAGE.	01 - UNDERGRADUATE CERTIFICATE	ZONE		9.26	1781	19325	ZONE	113.41	1781	1570	FAIL	N/A	N/A	N/A	N/A	19325
02-0858	FLORIDA CAREER COLLEGE	MIAMI	FL	331742521	PRIORITARY 2 TO 3 YEARS	510909	REGISTERED NURSING/REGISTERED NURSE	02 - ASSOCIATES DEGREE	PASS		6.74	2520	37378	PASS	12.77	2520	19723	PASS	N/A	N/A	N/A	N/A	37378
02-0858	FLORIDA CAREER COLLEGE	MIAMI	FL	331742521	PRIORITARY 2 TO 3 YEARS	513902	NURSING ASSISTANT/AIDE AND PATIENT CARE ASSISTANT/AIDE.	01 - UNDERGRADUATE CERTIFICATE	ZONE		8.62	1321	15313	ZONE	100	1321	0	FAIL	10.52	1611	15313	ZONE	100
02-0858	FLORIDA CAREER COLLEGE	MIAMI	FL	331742521	PRIORITARY 2 TO 3 YEARS	520201	BUSINESS ADMINISTRATION AND MANAGEMENT, GENERAL	02 - ASSOCIATES DEGREE	FAIL		16.55	3876	23413	FAIL	67.31	3876	3758	FAIL	N/A	N/A	N/A	N/A	23413
02-0858	FLORIDA CAREER COLLEGE	MIAMI	FL	331742521	PRIORITARY 2 TO 3 YEARS	520201	BUSINESS ADMINISTRATION AND MANAGEMENT, GENERAL	01 - BACHELORS DEGREE	FAIL		17.18	4802	27937	FAIL	46.7	4802	10282	FAIL	N/A	N/A	N/A	N/A	27937
02-0858	FLORIDA CAREER COLLEGE	MIAMI	FL	331742521	PRIORITARY 2 TO 3 YEARS	521201	MANAGEMENT INFORMATION SYSTEMS, GENERAL	01 - BACHELORS DEGREE	FAIL		18.18	5129	28303	FAIL	48.62	5129	10547	FAIL	N/A	N/A	N/A	N/A	28303
02-3062	VENANGO COUNTY AREA VOCATIONAL TECHNICAL SCHOOL	OLY CITY	PA	160935001	PUBLIC LESS THAN 2 YEARS	513901	KENNES PRACTICAL/VOCATIONAL NURSE TRAINING	01 - UNDERGRADUATE CERTIFICATE	PASS		5.65	1503	27037	PASS	15.65	1503	9982	PASS	N/A	N/A	N/A	N/A	27037
02-3063	BRIGHTWOOD COLLEGE	SALIDA	CA	953680808	PRIORITARY 2 TO 3 YEARS	430104	CRIMINAL JUSTICE/SAFETY STUDIES	02 - ASSOCIATES DEGREE	ZONE	A	9.19	1935	21046	ZONE	57.06	1935	3391	FAIL	9.38	1976	21046	ZONE	58.27
02-3063	BRIGHTWOOD COLLEGE	SALIDA	CA	953680808	PRIORITARY 2 TO 3 YEARS	510601	DENTAL ASSISTING/ASSISTANT	01 - UNDERGRADUATE CERTIFICATE	PASS		7.67	1311	17085	PASS	100	1311	0	FAIL	N/A	N/A	N/A	N/A	17085
02-3063	BRIGHTWOOD COLLEGE	SALIDA	CA	953680808	PRIORITARY 2 TO 3 YEARS	510710	MEDICAL OFFICE ASSISTANT/SPECIALIST.	01 - UNDERGRADUATE CERTIFICATE	PASS		8.27	1183	14296	ZONE	1183	0	FALL	0.95	16	14296	PASS	100	
02-3063	BRIGHTWOOD COLLEGE	SALIDA	CA	953680808	PRIORITARY 2 TO 3 YEARS	510801	MEDICAL/CLINICAL ASSTANT.	01 - UNDERGRADUATE CERTIFICATE	PASS		7.51	1116	14857	PASS	100	1116	0	FAIL	N/A	N/A	N/A	N/A	14857
02-3063	BRIGHTWOOD COLLEGE	SALIDA	CA	953680808	PRIORITARY 2 TO 3 YEARS	510909	RESPIRATORY CARE THERAPY/THERAPIST.	02 - ASSOCIATES DEGREE	PASS		7.65	3054	39881	PASS	13.74	3054	22326	PASS	N/A	N/A	N/A	N/A	39881
02-3063	BRIGHTWOOD COLLEGE	SALIDA	CA	953680808	PRIORITARY 2 TO 3 YEARS	512399	REHABILITATION AND THERAPEUTIC PROFESSIONS, OTHER.	01 - UNDERGRADUATE CERTIFICATE	PASS		7.38	1322	15318	PASS	100	1322	0	FAIL	N/A	N/A	N/A	N/A	15318
02-3067	FORT WORTH BEAUTY SCHOOL	FORT WORTH	TX	761370027	PRIORITARY LESS THAN 2 YEARS	204001	COSMETOLOGY/COSMETOLOGIST, GENERAL	01 - UNDERGRADUATE CERTIFICATE	ZONE		11.45	1013	8847	ZONE	100	1013	0	FAIL	12.84	1136	8847	FAIL	100
02-3063	BRIGHTWOOD COLLEGE	SALIDA	CA	953680808	PRIORITARY LESS THAN 2 YEARS	20410	TECHNICAL/SPECIALIST AND MANICURIST	01 - UNDERGRADUATE CERTIFICATE	PASS		3.75	351	12733	PASS	100	351	0	FAIL	N/A	N/A	N/A	N/A	12733
02-3068	PLATT COLLEGE	TULSA	OK	744511111	PRIORITARY 4 YEARS ON MORE	20503	CULINARY ARTS/CHEF TRAINING.	02 - ASSOCIATES DEGREE	FAIL	A	13.41	2825	19569	FAIL	137.14	2625	3544	FAIL	13.37	2617	19569	FAIL	136.72
02-3068	PLATT COLLEGE	TULSA	OK	744511111	PRIORITARY 4 YEARS ON MORE	70203	HEATING, AIR CONDITIONING, VENTILATION AND REFRIGERATION MAINTENANCE TECHNOLOGY/TECHNICIAN	01 - UNDERGRADUATE CERTIFICATE	ZONE	A	9.39	1959	20815	ZONE	61.89	1959	3560	FAIL	8.77	1827	20815	ZONE	57.81
02-3068	PLATT COLLEGE	TULSA	OK	744511111	PRIORITARY 4 YEARS ON MORE	70605	DESIGN TECHNOLOGY/TECHNICIAN	01 - UNDERGRADUATE CERTIFICATE	ZONE	A	12.16	2459	20214	FAIL	96.09	2459	3560	FAIL	10.98	2221	20214	ZONE	86.79
02-3068	PLATT COLLEGE	TULSA	OK	744511111	PRIORITARY 4 YEARS ON MORE	510601	DENTAL ASSISTING/ASSISTANT.	01 - UNDERGRADUATE CERTIFICATE	ZONE	A	8.09	1289	15929	ZONE	100	1289	0	FAIL	8.33	1327	15929	ZONE	100
02-3068	PLATT COLLEGE	TULSA	OK	744511111	PRIORITARY 4 YEARS ON MORE	510710	MEDICAL OFFICE ASSISTANT/SPECIALIST.	01 - UNDERGRADUATE CERTIFICATE	ZONE	A	9.21	1311	14231	ZONE	100	1311	0	FAIL	10.95	1473	14231	ZONE	100
02-3068	PLATT COLLEGE	TULSA	OK	744511111	PRIORITARY 4 YEARS ON MORE	510801	MEDICAL/CLINICAL ASSTANT.	01 - UNDERGRADUATE CERTIFICATE	ZONE	A	8.36	1308	15643	ZONE	100	1308	0	FAIL	9.85	1543	15642	ZONE	100
02-3068	PLATT COLLEGE	TULSA	OK	744511111	PRIORITARY 4 YEARS ON MORE	20503	BAKING AND PASTRY ARTS/BAKERY/CHEF/CATERING.	01 - UNDERGRADUATE CERTIFICATE	PASS		7.65	1548	20312	PASS	60.06	1548	2577	FAIL	N/A	N/A	N/A	N/A	20312
02-3068	PLATT COLLEGE	TULSA	OK	744511111	PRIORITARY 4 YEARS ON MORE	50502	HEATING, VENTILATION, AIR CONDITIONING AND REFRIGERATION ENGINEERING TECHNOLOGY/TECHNICIAN	01 - UNDERGRADUATE CERTIFICATE	PASS		6.26	1627	25985	PASS	19.54	1627	8326	PASS	N/A	N/A	N/A	N/A	25985
02-3068	PLATT COLLEGE	TULSA	OK	744511111	PRIORITARY 4 YEARS ON MORE	70604	AUTOMOBILE/AUTOMOTIVE MECHANICS TECHNOLOGY/TECHNICIAN	01 - UNDERGRADUATE CERTIFICATE	PASS		11.32	2208	20021	ZONE	95.85	2208	3366	FAIL	0	20021	PASS	0	20021
02-3068	PLATT COLLEGE	TULSA	OK	744511111	PRIORITARY 4 YEARS ON MORE	80508	WELDING TECHNOLOGY/WELDER.	01 - UNDERGRADUATE CERTIFICATE	PASS		8.37	1795	21425	ZONE	47.61	1795	2760	FAIL	1.1	236	21425	PASS	6.25
02-3068	PLATT COLLEGE	TULSA	OK	744511111	PRIORITARY 4 YEARS ON MORE	510805	PHARMACY TECHNICIAN/ASSISTANT.	01 - UNDERGRADUATE CERTIFICATE	PASS		5.42	1037	19303	PASS	71.61	1037	1448	FAIL	N/A	N/A	N/A	N/A	19303
02-3068	PLATT COLLEGE	TULSA	OK	744511111	PRIORITARY 4 YEARS ON MORE	513901	MESSAGE THERAPY/THERAPEUTIC MASSAGE.	01 - UNDERGRADUATE CERTIFICATE	PASS		5.08	885	17005	PASS	100	885	0	FAIL	N/A	N/A	N/A	N/A	17005
02-3068	PLATT COLLEGE	TULSA	OK	744511111	PRIORITARY 4 YEARS ON MORE	513905	KENNES PRACTICAL/VOCATIONAL NURSE TRAINING.	02 - ASSOCIATES DEGREE	PASS		7.05	2286	32405	PASS	15.49	2286	14750	PASS	N/A	N/A	N/A	N/A	32405
02-3068	PLATT COLLEGE	TULSA	OK	744511111	PRIORITARY 4 YEARS ON MORE	520202	ACCOUNTING TECHNOLOGY/TECHNICIAN AND BOOKKEEPING.	01 - UNDERGRADUATE CERTIFICATE	PASS		5.52	1097	19864	PASS	49.66	1097	2209	FAIL	N/A	N/A	N/A	N/A	19864
02-3069	IOWA SCHOOL OF BEAUTY	OTTUMWA	IA	525012312	PRIORITARY 2 TO 3 YEARS	520309	COSMETOLOGY AND RELATED PERSONAL GROOMING ARTS, OTHER.	01 - UNDERGRADUATE CERTIFICATE	FAIL	A	13.25	1710	12888	FAIL	100	1710	0	FAIL	12.84	1657	12808	FAIL	100
02-3074	GEORGE STONE AREA VOCATIONAL TECHNICAL CENTER	PENACOLA	FL	32528032	PUBLIC LESS THAN 2 YEARS	430107	CRIMINAL JUSTICE/POLICE SCIENCE.	01 - UNDERGRADUATE CERTIFICATE	PASS		0	34393	PASS	0	0	16336	PASS	N/A	N/A	N/A	N/A	34393	
02-3079	MASTERS OF COSMETOLOGY COLLEGE	FORT WAYNE	IN	468091385	PRIORITARY 2 TO 3 YEARS	520403	COSMETOLOGY/COSMETOLOGIST, GENERAL.	01 - UNDERGRADUATE CERTIFICATE	PASS		10.99	1607	15087	ZONE	100	1607	0	FAIL	N/A	N/A	N/A	N/A	15087
02-3089	MASTERS OF COSMETOLOGY COLLEGE	FORT WAYNE	IN	468091385	PRIORITY LESS THAN 2 YEARS	20400	HAIR/HAIR																

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Institution Code (4-digit OFED)	Institution Name	City	State	Zip	Institution Type	CIP Code	OP Name	Credential Level	Official Program Pmtz/Fall	Appet Status	Debt-to-Earnings Annual Ratio	Debt-to-Earnings Annual Ratio Numerator	Debt-to-Earnings Annual Ratio Denominator	Debt-to-Earnings Annual Ratio Pass/Fail/Zone	Debt-to-Earnings Discretionary Income Ratio	Debt-to-Earnings Discretionary Income Ratio Numerator	Debt-to-Earnings Discretionary Income Ratio Denominator	Debt-to-Earnings Discretionary Income Ratio Pass/Fail/Zone	Debt-to-Earnings Transitional Ratio	Debt-to-Earnings Transitional Ratio Numerator	Debt-to-Earnings Transitional Ratio Denominator	Debt-to-Earnings Transitional Ratio Pass/Fail/Zone	Mean Annual Earnings	Median Annual Earnings				
023313	INTERACTIVE COLLEGE OF TECHNOLOGY	PASADENA	TX	77501201	PROPRIETARY 2 TO 3 YEARS	520407	BUSINESS/OFFICE AUTOMATION TECHNOLOGY/DATA ENTRY	01 - UNDERGRADUATE CERTIFICATE	PASS		2.72	548	20147	PASS	21.99	548	2492	ZONE	N/A	N/A	N/A	N/A	N/A	20147	16438			
023314	NORTHWEST HART ACADEMY	MOUNT VERNON	WA	982733020	PROPRIETARY 2 TO 3 YEARS	520401	COMPUTING/COMSALTOLOGIST, GENERAL	01 - UNDERGRADUATE CERTIFICATE	PASS		7.08	1487	20579	PASS	49.82	1457	2904	FAIL	N/A	N/A	N/A	N/A	N/A	20579	19623			
023322	HARR PROFESSIONAL CAREER COLLEGE	SYCAMORE	IL	601783564	PROPRIETARY LESS THAN 2 YEARS	520401	COMSALTOLOGIST/COMSALTOLOGIST, GENERAL	01 - UNDERGRADUATE CERTIFICATE	ZONE	A	12.11	1276	14249	FAIL	10	1726	0	FAIL	9.52	1357	14249	ZONE	100	1357	0	FAIL	14249	13086
023322	HARR PROFESSIONAL CAREER COLLEGE	SYCAMORE	IL	601783564	PROPRIETARY LESS THAN 2 YEARS	520409	AEHTHIC/AN/ESTHETICIAN AND SKIN CARE SPECIALIST	01 - UNDERGRADUATE CERTIFICATE	PASS		4.73	1079	23079	PASS	20.15	1093	5424	ZONE	N/A	N/A	N/A	N/A	N/A	21808	23039			
023328	CENTER FOR EMPLOYMENT TRAINING	SAN JOSE	CA	95102940	PRIVATE, NOT FOR PROFIT LESS THAN 2 YEARS	520599	CULINARY ARTS AND RELATED SERVICES, OTHER	01 - UNDERGRADUATE CERTIFICATE	PASS		3.93	694	17552	PASS	100	694	0	FAIL	N/A	N/A	N/A	N/A	N/A	17552	10431			
023328	CENTER FOR EMPLOYMENT TRAINING	SAN JOSE	CA	95102940	PRIVATE, NOT FOR PROFIT LESS THAN 2 YEARS	515204	COMPUTER SOFTWARE TECHNOLOGY/TECHNICIAN	01 - UNDERGRADUATE CERTIFICATE	ZONE		8.63	789	9146	ZONE	100	789	0	FAIL	8.15	746	9146	ZONE	100	746	0	FAIL	9146	7756
023328	CENTER FOR EMPLOYMENT TRAINING	SAN JOSE	CA	95102940	PRIVATE, NOT FOR PROFIT LESS THAN 2 YEARS	510608	HOUSING AND HUMAN ENVIRONMENTS, OTHER	01 - UNDERGRADUATE CERTIFICATE	ZONE		0	0	12720	PASS	0	0	0	PASS	N/A	N/A	N/A	N/A	N/A	12720	16733			
023328	CENTER FOR EMPLOYMENT TRAINING	SAN JOSE	CA	95102940	PRIVATE, NOT FOR PROFIT LESS THAN 2 YEARS	190709	CHILD CARE PROVIDER/ASSISTANT	01 - UNDERGRADUATE CERTIFICATE	PASS		2.92	483	16490	PASS	100	483	0	FAIL	N/A	N/A	N/A	N/A	N/A	16490	15743			
023328	CENTER FOR EMPLOYMENT TRAINING	SAN JOSE	CA	95102940	PRIVATE, NOT FOR PROFIT LESS THAN 2 YEARS	460601	HEALTH/PROPERTY MAINTENANCE	01 - UNDERGRADUATE CERTIFICATE	PASS		3.75	611	16265	PASS	100	611	0	FAIL	N/A	N/A	N/A	N/A	N/A	16265	17807			
023328	CENTER FOR EMPLOYMENT TRAINING	SAN JOSE	CA	95102940	PRIVATE, NOT FOR PROFIT LESS THAN 2 YEARS	470021	ELECTRICAL/ELECTRONICS EQUIPMENT INSTALLATION AND REPAIR, GENERAL	01 - UNDERGRADUATE CERTIFICATE	PASS		4	999	24965	PASS	13.66	999	7310	PASS	N/A	N/A	N/A	N/A	N/A	24965	22385			
023328	CENTER FOR EMPLOYMENT TRAINING	SAN JOSE	CA	95102940	PRIVATE, NOT FOR PROFIT LESS THAN 2 YEARS	470021	HEATING, AIR CONDITIONING, VENTILATION AND REFRIGERATION MAINTENANCE TECHNOLOGY/TECHNICIAN	01 - UNDERGRADUATE CERTIFICATE	PASS		2.27	536	23563	PASS	9.07	536	5989	PASS	N/A	N/A	N/A	N/A	N/A	23563	19467			
023328	CENTER FOR EMPLOYMENT TRAINING	SAN JOSE	CA	95102940	PRIVATE, NOT FOR PROFIT LESS THAN 2 YEARS	470604	AUTOMOBILE/AUTOMOTIVE MECHANICS TECHNOLOGY/TECHNICIAN	01 - UNDERGRADUATE CERTIFICATE	PASS		2.03	469	23002	PASS	8.62	469	5437	PASS	N/A	N/A	N/A	N/A	N/A	23002	22383			
023328	CENTER FOR EMPLOYMENT TRAINING	SAN JOSE	CA	95102940	PRIVATE, NOT FOR PROFIT LESS THAN 2 YEARS	480501	MACHINE TOOL TECHNOLOGY/MACHINIST	01 - UNDERGRADUATE CERTIFICATE	PASS		2.29	521	22793	PASS	10.32	521	5008	PASS	N/A	N/A	N/A	N/A	N/A	22418	20707			
023328	CENTER FOR EMPLOYMENT TRAINING	SAN JOSE	CA	95102940	PRIVATE, NOT FOR PROFIT LESS THAN 2 YEARS	485503	MACHINE SHOP TECHNOLOGY/ASSISTANT	01 - UNDERGRADUATE CERTIFICATE	PASS		2.2	483	21931	PASS	11.34	483	4258	PASS	N/A	N/A	N/A	N/A	N/A	21931	19733			
023328	CENTER FOR EMPLOYMENT TRAINING	SAN JOSE	CA	95102940	PRIVATE, NOT FOR PROFIT LESS THAN 2 YEARS	485508	WELDING TECHNOLOGY/WELDER	01 - UNDERGRADUATE CERTIFICATE	PASS		2.55	514	20201	PASS	21.01	514	2446	ZONE	N/A	N/A	N/A	N/A	N/A	20101	16776			
023328	CENTER FOR EMPLOYMENT TRAINING	SAN JOSE	CA	95102940	PRIVATE, NOT FOR PROFIT LESS THAN 2 YEARS	490205	TRUCK AND BUS SERVICE/COMMERCIAL VEHICLE OPERATOR AND INSTRUCTOR	01 - UNDERGRADUATE CERTIFICATE	PASS		1.67	637	38010	PASS	8.12	637	20355	PASS	N/A	N/A	N/A	N/A	N/A	38010	28000			
023328	CENTER FOR EMPLOYMENT TRAINING	SAN JOSE	CA	95102940	PRIVATE, NOT FOR PROFIT LESS THAN 2 YEARS	499989	TRANSPORTATION AND MATERIALS MOVING, OTHER	01 - UNDERGRADUATE CERTIFICATE	PASS		0	0	17070	PASS	0	0	0	PASS	N/A	N/A	N/A	N/A	N/A	16295	17505			
023328	CENTER FOR EMPLOYMENT TRAINING	SAN JOSE	CA	95102940	PRIVATE, NOT FOR PROFIT LESS THAN 2 YEARS	510707	HEALTH INFORMATION/MEDICAL RECORDS TECHNOLOGY/TECHNICIAN	01 - UNDERGRADUATE CERTIFICATE	PASS		0	0	12636	PASS	0	0	0	PASS	N/A	N/A	N/A	N/A	N/A	12636	11261			
023328	CENTER FOR EMPLOYMENT TRAINING	SAN JOSE	CA	95102940	PRIVATE, NOT FOR PROFIT LESS THAN 2 YEARS	510710	MEDICAL OFFICE ASSISTANT/SPECIALIST	01 - UNDERGRADUATE CERTIFICATE	PASS		3.36	507	15056	PASS	100	507	0	FAIL	N/A	N/A	N/A	N/A	N/A	15056	12408			
023328	CENTER FOR EMPLOYMENT TRAINING	SAN JOSE	CA	95102940	PRIVATE, NOT FOR PROFIT LESS THAN 2 YEARS	510714	MEDICAL OFFICE SPECIALIST/MEDICAL BILLER	01 - UNDERGRADUATE CERTIFICATE	PASS		5.95	748	12576	PASS	100	748	0	FAIL	N/A	N/A	N/A	N/A	N/A	12576	11677			
023328	CENTER FOR EMPLOYMENT TRAINING	SAN JOSE	CA	95102940	PRIVATE, NOT FOR PROFIT LESS THAN 2 YEARS	510801	MEDICAL/CLINICAL ASSISTANT	01 - UNDERGRADUATE CERTIFICATE	PASS		3.41	548	16062	PASS	100	548	0	FAIL	N/A	N/A	N/A	N/A	N/A	16062	15047			
023328	CENTER FOR EMPLOYMENT TRAINING	SAN JOSE	CA	95102940	PRIVATE, NOT FOR PROFIT LESS THAN 2 YEARS	520302	ACCOUNTING TECHNOLOGY/TECHNICIAN AND BOOKKEEPING	01 - UNDERGRADUATE CERTIFICATE	PASS		1.22	155	12562	PASS	100	155	0	FAIL	N/A	N/A	N/A	N/A	N/A	12562	12381			
023328	CENTER FOR EMPLOYMENT TRAINING	SAN JOSE	CA	95102940	PRIVATE, NOT FOR PROFIT LESS THAN 2 YEARS	520407	BUSINESS/OFFICE AUTOMATION TECHNOLOGY/DATA ENTRY	01 - UNDERGRADUATE CERTIFICATE	PASS		3.66	483	13189	PASS	100	483	0	FAIL	N/A	N/A	N/A	N/A	N/A	13189	11590			
023328	CENTER FOR EMPLOYMENT TRAINING	SAN JOSE	CA	95102940	PRIVATE, NOT FOR PROFIT LESS THAN 2 YEARS	521803	RETAILING AND RETAIL OPERATIONS	01 - UNDERGRADUATE CERTIFICATE	PASS		0	0	7946	PASS	0	0	0	PASS	N/A	N/A	N/A	N/A	N/A	7946	7946			
023328	CENTER FOR EMPLOYMENT TRAINING	SAN JOSE	CA	95102940	PRIVATE, NOT FOR PROFIT LESS THAN 2 YEARS	529999	BUSINESS, MANAGEMENT, MARKETING, AND RELATED SUPPORT SERVICES, OTHER	01 - UNDERGRADUATE CERTIFICATE	PASS		4.7	552	11728	PASS	100	552	0	FAIL	N/A	N/A	N/A	N/A	N/A	11728	7946			
023341	EMPIRE BEAUTY SCHOOL	CINCINNATI	OH	45239926	PROPRIETARY 4 YEARS OR MORE	120401	COMSALTOLOGIST/COMSALTOLOGIST, GENERAL	01 - UNDERGRADUATE CERTIFICATE	ZONE	A	9.02	1380	15739	ZONE	100	1380	0	FAIL	11.83	1810	15298	ZONE	100	1810	0	FAIL	15298	11125
023344	CENTURA COLLEGE	VIRGINIA BEACH	VA	23452741	PROPRIETARY 4 YEARS OR MORE	111002	SYSTEM, NETWORKING, AND LAN/WAN MANAGEMENT/MANAGER	02 - ASSOCIATES DEGREE	FAIL	A	14.4	3466	23998	FAIL	54.48	3456	6343	FAIL	15.1	3625	23998	FAIL	57.14	3625	6343	FAIL	23998	20204
023344	CENTURA COLLEGE	VIRGINIA BEACH	VA	23452741	PROPRIETARY 4 YEARS OR MORE	220302	LEGAL ASSISTANT/PARALEGAL	02 - ASSOCIATES DEGREE	FAIL	A	25.55	3625	14184	FAIL	100	3625	0	FAIL	N/A	N/A	N/A	N/A	N/A	14184	10637			
023344	CENTURA COLLEGE	VIRGINIA BEACH	VA	23452741	PROPRIETARY 4 YEARS OR MORE	430502	CORRECTIONS	02 - ASSOCIATES DEGREE	FAIL	A	20.21	3625	17931	FAIL	999.99	3625	276	FAIL	N/A	N/A	N/A	N/A	N/A	17931	16839			
023344	CENTURA COLLEGE	VIRGINIA BEACH	VA	23452741	PROPRIETARY 4 YEARS OR MORE	510710	MEDICAL OFFICE ASSISTANT/SPECIALIST	02 - ASSOCIATES DEGREE	FAIL	A	24.49	3625	14707	FAIL	100	3625	0	FAIL	23.47	3474	14797	FAIL	100	3474	0	FAIL	14797	16839
023344	CENTURA COLLEGE	VIRGINIA BEACH	VA	23452741	PROPRIETARY 4 YEARS OR MORE	519501	MASSAGE THERAPY/THERAPEUTIC MASSAGE	02 - ASSOCIATES DEGREE	FAIL	A	18.92	2767	14623	FAIL	100	2767	0	FAIL	22.48	3288	14623	FAIL	100	3288	0	FAIL	14623	11465
023344	CENTURA COLLEGE	VIRGINIA BEACH	VA	23452741	PROPRIETARY 4 YEARS OR MORE	520204	OFFICE MANAGEMENT AND SUPERVISION	02 - ASSOCIATES DEGREE	FAIL	A	18.29	2450	13860	FAIL	286.3	3450	1205	FAIL	18	3395	18620	FAIL	281.74	3395	1205	FAIL	18660	11465
023344	CENTURA COLLEGE	VIRGINIA BEACH	VA	23452741	PROPRIETARY 4 YEARS OR MORE	520204	OFFICE MANAGEMENT AND SUPERVISION	02 - BACHELORS DEGREE	FAIL	A	14.46	3554	24563	FAIL	51.44	3554	6908	FAIL	16.69	4302	24563	FAIL	59.38	4302	6908	FAIL	24563	20763
023344	CENTURA COLLEGE	VIRGINIA BEACH	VA	23452741	PROPRIETARY 4 YEARS OR MORE	520302	ACCOUNTING TECHNOLOGY/TECHNICIAN AND BOOKKEEPING	02 - ASSOCIATES DEGREE	FAIL	A	20.96	3276	15026	FAIL	100	3276	0	FAIL	N/A	N/A	N/A	N/A	N/A	15026	10503			
023344	CENTURA COLLEGE	VIRGINIA BEACH	VA	23452741	PROPRIETARY 4 YEARS OR MORE	530601	DENTAL ASSISTANT/ASSISTANT	01 - UNDERGRADUATE CERTIFICATE	PASS		7.98	1312	16431	PASS	100	1312	0	FAIL	N/A	N/A	N/A	N/A	N/A	16431	14695			
023344	CENTURA COLLEGE	VIRGINIA BEACH	VA	23452741	PROPRIETARY 4 YEARS OR MORE	510713	MEDICAL INSURANCE CODING SPECIALIST/CODER	01 - UNDERGRADUATE CERTIFICATE	PASS		7.9	1314	16632	PASS	100	1314	0	FAIL	N/A	N/A	N/A	N/A	N/A	16632	16287			
023344	CENTURA COLLEGE	VIRGINIA BEACH	VA	23452741	PROPRIETARY 4 YEARS OR MORE	519501	MASSAGE THERAPY/VOCATIONAL NURSING TRAINING	01 - UNDERGRADUATE CERTIFICATE	PASS		9.19	1329	34014	ZONE	19.12	3129	16359	PASS	N/A	N/A	N/A	N/A	N/A	3129	13491	34014		
023357	BATON ROUGE GENERAL MEDICAL CENTER	BATON ROUGE	LA	70806389	PRIVATE, NOT FOR PROFIT LESS THAN 2 YEARS	513801	REGISTERED NURSING/REGISTERED NURSE	01 - UNDERGRADUATE CERTIFICATE	PASS		4.75	2364	49736	PASS	7.36	2364	32081	PASS	N/A	N/A	N/A	N/A	N/A	49736	49736			
023363	KNOX COUNTY CAREER CENTER	MOUNT VERNON	OH	430504298	PUBLIC LESS THAN 2 YEARS	513801	MASSAGE THERAPY/THERAPEUTIC MASSAGE	01 - UNDERGRADUATE CERTIFICATE	PASS		6.03	1166	19316	PASS	70.19	1166	1661	FAIL	N/A	N/A	N/A	N/A	N/A	15756	11661			
023363	KNOX COUNTY CAREER CENTER	MOUNT VERNON	OH	430504298	PUBLIC LESS THAN 2 YEARS	513801	MASSAGE THERAPY/THERAPEUTIC NURSING TRAINING	01 - UNDERGRADUATE CERTIFICATE	PASS		2.76	891	32248	PASS	6.1	891	14931	PASS	N/A	N/A	N/A	N/A	N/A	31327	32146			
023367	CUYAHOGA VALLEY CAREER CENTER	BRECKENSTEN	OH	44411276	PROPRIETARY 2 TO 3 YEARS	513801	MASSAGE THERAPY/VOCATIONAL NURSING TRAINING	01 - UNDERGRADUATE CERTIFICATE	PASS		3.68	1311	35005	PASS	7.3	1311	17950	PASS	N/A	N/A	N/A	N/A	N/A	35005	35005			
023374	BANCROFT SCHOOL OF MASSAGE THERAPY	WECHESTER	MA	01004614	PROPRIETARY LESS THAN 2 YEARS	513801	MASSAGE THERAPY/THERAPEUTIC MASSAGE	01 - UNDERGRADUATE CERTIFICATE	PASS		4.54	1131	25866	PASS	11.69	1131	12211	PASS	N/A	N/A	N/A	N/A	N/A	25866	26879			
023377	PROFESSIONAL SKILLS INSTITUTE	MAUMEE	OH	43537200	PROPRIETARY 2 TO 3 YEARS	510801	MEDICAL/CLINICAL ASSISTANT	01 - UNDERGRADUATE CERTIFICATE	ZONE	A	9.72	1823	18754	ZONE	165.87	1823	1000	FAIL	N/A	N/A	N/A	N/A	N/A	18754	18754			
023377	PROFESSIONAL SKILLS INSTITUTE	MAUMEE	OH	43537200	PROPRIETARY 2 TO 3 YEARS	510806	PHYSICAL THERAPY TECHNICIAN/ASSISTANT	02 - ASSOCIATES DEGREE	PASS		7.29	3033	41274	PASS	12.75	3033	23619	PASS	N/A	N/A	N/A	N/A	N/A	41274	41274			
023377	PROFESSIONAL SKILLS INSTITUTE	MAUMEE	OH	43537200	PROPRIETARY 2 TO 3 YEARS	519501	MASSAGE THERAPY/VOCATIONAL NURSING TRAINING	01 - UNDERGRADUATE CERTIFICATE	PASS		6.54	2750	42024	PASS	11.28	2750	24389	PASS	N/A	N/A	N/A	N/A	N/A	42024	42024			
023379	COLLEGE OF HAIR DESIGN CAREERS	SALEM	OR	971011952	PROPRIETARY LESS THAN 2 YEARS	120401	COMSALTOLOGIST/COMSALTOLOGIST, GENERAL	01 - UNDERGRADUATE CERTIFICATE	ZONE		10.41	1657	15903	ZONE	100	1657	0	FAIL	N/A	N/A	N/A	N/A	N/A	15903	14409			
023384	FORT PIERCE BEAUTY ACADEMY	FORT PIERCE	FL	34920000	PROPRIETARY LESS THAN 2 YEARS	120401	COMSALTOLOGIST/COMSALTOLOGIST, GENERAL	01 - UNDERGRADUATE CERTIFICATE	ZONE		8.05	1048	13005	ZONE	100	1048	0	FAIL	8.62	1122	13005	ZONE	100	1122	0	FAIL	13005	11425
023384	FORT PIERCE BEAUTY ACADEMY	FORT PIERCE	FL	34920000	PROPRIETARY LESS THAN 2 YEARS	120402	BARBERING/BARBER	01 - UNDERGRADUATE CERTIFICATE	ZONE		9.79	1076	10986	ZONE	100	1076	0	FAIL	10.1	1110	10986	ZONE	100	1110	0	FAIL	10986	1308
023384	FORT PIERCE BEAUTY ACADEMY	FORT PIERCE	FL	34920000	PROPRIETARY LESS THAN 2 YEARS	519501	MASSAGE THERAPY/THERAPEUTIC MASSAGE	01 - UNDERGRADUATE CERTIFICATE	PASS		3.75	552	14713	PASS	100	552	0	FAIL	N/A	N/A	N/A	N/A	N/A	14713	10951			
023385	GLENDALE CAREER COLLEGE	GLENDALE	CA	91201207	PROPRIETARY 2 TO 3 YEARS	510707	HEALTH INFORMATION/MEDICAL RECORDS TECHNOLOGY/TECHNICIAN	01 - UNDERGRADUATE CERTIFICATE	PASS		4.58	873	19026	PASS	63.67	873</												

[illegible]

Institution Ranking (2019)	Institution Name	City	State	Zip	IP	Institution Type	CIP Code	COP Name	Credentialed Level	Official Program Pass/Fail/Zone	Appeal Status	Debt-to-Earnings Annual Rate	Debt-to-Earnings Annual Rate Numerator	Debt-to-Earnings Annual Rate Denominator	Debt-to-Earnings Annual Rate Pass/Fail/Zone	Debt-to-Earnings Discretionary Income Rate Numerator	Debt-to-Earnings Discretionary Income Rate Denominator	Debt-to-Earnings Discretionary Income Rate Pass/Fail/Zone	Debt-to-Earnings Discretionary Income Rate Numerator	Debt-to-Earnings Discretionary Income Rate Denominator	Debt-to-Earnings Discretionary Income Rate Pass/Fail/Zone	Debt-to-Earnings Transitional Rate Numerator	Debt-to-Earnings Transitional Rate Denominator	Debt-to-Earnings Transitional Rate Pass/Fail/Zone	Debt-to-Earnings Transitional Discretionary Income Rate Numerator	Debt-to-Earnings Transitional Discretionary Income Rate Denominator	Debt-to-Earnings Transitional Discretionary Income Rate Pass/Fail/Zone	Mean Annual Earnings	Median Annual Earnings	
023519	BRIGHTWOOD COLLEGE	SACRAMENTO	CA	958217012	PROPRIETARY 2 TO 3 YEARS	151901	LICENSED PRACTICAL/VOCATIONAL NURSE TRAINING	01- UNDERGRADUATE CERTIFICATE	PASS			4.54	1070	43148	PASS	7.66	1976	25693	PASS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	38208	43148
023520	CHORDON RUIO COLLEGE OF CULINARY ARTS IN CHICAGO	CHICAGO	IL	606103000	PROPRIETARY 2 TO 3 YEARS	120503	BAKING AND PASTRY ARTS/BAKERY/PASTRY CHEF	02- ASSOCIATES DEGREE	FAIL			14.1	3376	22509	FAIL	65.43	3176	4854	FAIL	14.87	3349	22509	FAIL	68.99	3349	4854	FAIL	22647	22509	
023522	LE CDORION RUEI COLLEGE OF CULINARY ARTS IN CHICAGO	CHICAGO	IL	606103000	PROPRIETARY 2 TO 3 YEARS	120503	CULINARY ARTS/CHEF TRAINING	01- UNDERGRADUATE CERTIFICATE	PASS			6.69	1733	25883	PASS	21.06	1733	8228	220NE	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	25883	27351
023522	LE CDORION RUEI COLLEGE OF CULINARY ARTS IN CHICAGO	CHICAGO	IL	606103000	PROPRIETARY 2 TO 3 YEARS	120503	CULINARY ARTS/CHEF TRAINING	02- ASSOCIATES DEGREE	PASS			15.36	3849	25056	FAIL	5.2	8849	7460	PASS	13.84	3469	25056	FAIL	46.87	3469	7460	FAIL	25056	24724	
023528	POLARIS CAREER CENTER - ADULT EDUCATION DEPARTMENT	MIDDELBURG HEIGHTS	OH	441303375	PUBLIC LESS THAN 2 YEARS	120503	HEATING, VENTILATING, AIR CONDITIONING AND REFRIGERATION ENGINEERING TECHNOLOGY/TECHNICIAN	01- UNDERGRADUATE CERTIFICATE	PASS			2.07	607	29313	PASS	5.2	607	11658	PASS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	29313	28233
023528	POLARIS CAREER CENTER - ADULT EDUCATION DEPARTMENT	MIDDELBURG HEIGHTS	OH	441303375	PUBLIC LESS THAN 2 YEARS	430107	CRIMINAL JUSTICE/POLICE SCIENCE	01- UNDERGRADUATE CERTIFICATE	PASS			0	40132	PASS	0	0	23477	PASS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	40132	39128
023528	POLARIS CAREER CENTER - ADULT EDUCATION DEPARTMENT	MIDDELBURG HEIGHTS	OH	441303375	PUBLIC LESS THAN 2 YEARS	480508	WELDING TECHNOLOGY/WELDER	01- UNDERGRADUATE CERTIFICATE	PASS			1.78	488	27603	PASS	5.14	481	9387	PASS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	27603	23916
023528	POLARIS CAREER CENTER - ADULT EDUCATION DEPARTMENT	MIDDELBURG HEIGHTS	OH	441303375	PUBLIC LESS THAN 2 YEARS	510601	DENTAL ASSISTING/ASSISTANT	01- UNDERGRADUATE CERTIFICATE	PASS			1.54	345	22338	PASS	7.33	345	4703	PASS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	19896	23388
023528	POLARIS CAREER CENTER - ADULT EDUCATION DEPARTMENT	MIDDELBURG HEIGHTS	OH	441303375	PUBLIC LESS THAN 2 YEARS	510719	MEDICAL INSURANCE CODING SPECIALIST/CODER	01- UNDERGRADUATE CERTIFICATE	PASS			0	0	18919	PASS	0	0	1264	PASS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	13784	9910
023528	POLARIS CAREER CENTER - ADULT EDUCATION DEPARTMENT	MIDDELBURG HEIGHTS	OH	441303375	PUBLIC LESS THAN 2 YEARS	510805	MEDICAL/LINICAL ASSISTANT	01- UNDERGRADUATE CERTIFICATE	PASS			0	0	13128	PASS	0	0	0	0	PASS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	13728	2206
023528	POLARIS CAREER CENTER - ADULT EDUCATION DEPARTMENT	MIDDELBURG HEIGHTS	OH	441303375	PUBLIC LESS THAN 2 YEARS	510805	PHARMACY TECHNICIAN/ASSISTANT	01- UNDERGRADUATE CERTIFICATE	PASS			1.97	434	21960	PASS	10.08	434	4305	PASS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	21960	21443
023531	NORTHERN TIER CAREER CENTER	TOWANDA	PA	168488005	PUBLIC LESS THAN 2 YEARS	510901	LICENSED PRACTICAL/VOCATIONAL NURSE TRAINING	01- UNDERGRADUATE CERTIFICATE	PASS			5.97	1640	27409	PASS	16.72	1640	9804	PASS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	25634	22649
023542	SCOTIO COUNTY CAREER TECHNICAL CENTER	LUCASVILLE	OH	454680000	PUBLIC 2 TO 3 YEARS	490237	CRIMINAL JUSTICE/POLICE SCIENCE	01- UNDERGRADUATE CERTIFICATE	PASS			1.95	534	27347	PASS	5.5	534	9692	PASS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	25405	27347
023542	SCOTIO COUNTY CAREER TECHNICAL CENTER	LUCASVILLE	OH	454680000	PUBLIC 2 TO 3 YEARS	490309	LINEWORKER	01- UNDERGRADUATE CERTIFICATE	PASS			1.99	759	38044	PASS	3.72	759	20899	PASS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	38044	36385
023542	SCOTIO COUNTY CAREER TECHNICAL CENTER	LUCASVILLE	OH	454680000	PUBLIC 2 TO 3 YEARS	470303	INDUSTRIAL MECHANICS AND MAINTENANCE TECHNOLOGY	01- UNDERGRADUATE CERTIFICATE	PASS			1.86	414	22219	PASS	9.07	414	4584	PASS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	22161	22219
023542	SCOTIO COUNTY CAREER TECHNICAL CENTER	LUCASVILLE	OH	454680000	PUBLIC 2 TO 3 YEARS	510716	MEDICAL ADMINISTRATIVE/EXECUTIVE ASSISTANT AND MEDICAL SECRETARY	01- UNDERGRADUATE CERTIFICATE	PASS			4.13	756	18294	PASS	118.3	756	639	FAIL	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	17490	18294
023542	SCOTIO COUNTY CAREER TECHNICAL CENTER	LUCASVILLE	OH	454680000	PUBLIC 2 TO 3 YEARS	510901	LICENSED PRACTICAL/VOCATIONAL NURSE TRAINING	01- UNDERGRADUATE CERTIFICATE	PASS			4.12	1311	31745	PASS	9.3	1311	14399	PASS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	31745	30381
023566	CHARLESTON COSMETOLOGY INSTITUTE	CHARLESTON	SC	294073119	PROPRIETARY LESS THAN 2 YEARS	120401	COSMETOLOGY/COSMETOLOGIST, GENERAL	01- UNDERGRADUATE CERTIFICATE	PASS			6.68	1144	17307	PASS	100	1144	0	FAIL	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	17307	15328
023577	PAUL MITCHELL THE SCHOOL HOUSTON	HOUSTON	TX	770434112	PROPRIETARY LESS THAN 2 YEARS	120405	COSMETOLOGY/COSMETOLOGIST, GENERAL	01- UNDERGRADUATE CERTIFICATE	PASS			7.43	1557	20995	PASS	47.46	1557	3280	FAIL	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	20995	17257
023582	LAMAR STATE COLLEGE - ORANGE	ORANGE	TX	776305899	PUBLIC 2 TO 3 YEARS	510705	DENTAL ASSISTING/ASSISTANT	01- UNDERGRADUATE CERTIFICATE	PASS			0	0	21265	PASS	0	0	3610	PASS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	21265	18287
023582	LAMAR STATE COLLEGE - ORANGE	ORANGE	TX	776305899	PUBLIC 2 TO 3 YEARS	510716	MEDICAL ADMINISTRATIVE/EXECUTIVE ASSISTANT AND MEDICAL SECRETARY	01- UNDERGRADUATE CERTIFICATE	PASS			0	0	14047	PASS	0	0	0	0	PASS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	14047	12484
023582	LAMAR STATE COLLEGE - ORANGE	ORANGE	TX	776305899	PUBLIC 2 TO 3 YEARS	510705	PHARMACY TECHNICIAN/ASSISTANT	01- UNDERGRADUATE CERTIFICATE	PASS			0	0	19511	PASS	0	0	1455	PASS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	1455	15911
023582	LAMAR STATE COLLEGE - ORANGE	ORANGE	TX	776305899	PUBLIC 2 TO 3 YEARS	510901	LICENSED PRACTICAL/VOCATIONAL NURSE TRAINING	01- UNDERGRADUATE CERTIFICATE	PASS			1.49	506	33935	PASS	3.1	506	16280	PASS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	33935	31258
023598	STAGE ONE THE HAIR SCHOOL	LAKE CHARLES	LA	706051602	PROPRIETARY LESS THAN 2 YEARS	120405	COSMETOLOGY/COSMETOLOGIST, GENERAL	01- UNDERGRADUATE CERTIFICATE	PASS			7	776	13076	PASS	100	776	0	FAIL	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	13076	9751
023608	PROVO COLLEGE	PROVO	UT	846011305	PROPRIETARY 4 YEARS OR MORE	300203	CRIMINAL JUSTICE/LAW ENFORCEMENT ADMINISTRATION	02- ASSOCIATES DEGREE	ZONE			12.05	3027	25120	FAIL	40.54	3027	7465	FAIL	11.04	2774	25120	ZONE	37.16	2774	7465	FAIL	24374	25120	
023608	PROVO COLLEGE	PROVO	UT	846011305	PROPRIETARY 4 YEARS OR MORE	500409	GRAPHIC DESIGN	02- ASSOCIATES DEGREE	ZONE			11.5	2896	25180	ZONE	38.48	2896	7525	FAIL	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	25180	24592	
023608	PROVO COLLEGE	PROVO	UT	846011305	PROPRIETARY 4 YEARS OR MORE	110601	DENTAL ASSISTING/ASSISTANT	01- UNDERGRADUATE CERTIFICATE	ZONE			9.11	1480	16235	ZONE	100	1480	0	FAIL	5.95	966	16231	PASS	100	966	0	FAIL	15900	16231	
023608	PROVO COLLEGE	PROVO	UT	846011305	PROPRIETARY 4 YEARS OR MORE	110801	MEDICAL/LINICAL ASSISTANT	01- UNDERGRADUATE CERTIFICATE	ZONE			11.23	1800	16043	ZONE	100	1800	0	FAIL	11.12	1785	16043	ZONE	100	1785	0	FAIL	16043	14607	
023608	PROVO COLLEGE	PROVO	UT	846011305	PROPRIETARY 4 YEARS OR MORE	110805	PHARMACY TECHNICIAN/ASSISTANT	01- UNDERGRADUATE CERTIFICATE	PASS			7.7	1718	22261	PASS	37.25	1718	4606	FAIL	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	22261	21747	
023608	PROVO COLLEGE	PROVO	UT	846011305	PROPRIETARY 4 YEARS OR MORE	510805	PHYSICAL THERAPY TECHNICIAN/ASSISTANT	02- ASSOCIATES DEGREE	PASS			8.08	3575	44210	ZONE	13.46	3575	26555	PASS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	44222	44210	
023608	PROVO COLLEGE	PROVO	UT	846011305	PROPRIETARY 4 YEARS OR MORE	515051	MESSAGE THERAPY/THERAPEUTIC NURSE	01- UNDERGRADUATE CERTIFICATE	PASS			11.68	1639	14021	ZONE	100	1639	0	FAIL	6.27	880	14021	PASS	100	880	0	FAIL	14021	14020	
023608	PROVO COLLEGE	PROVO	UT	846011305	PROPRIETARY 4 YEARS OR MORE	518001	REGISTERED NURSING/REGISTERED NURSE	02- ASSOCIATES DEGREE	PASS			7.77	3437	44222	PASS	12.93	3437	20567	PASS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	44062	44222	
023608	PROVO COLLEGE	PROVO	UT	846011305	PROPRIETARY 4 YEARS OR MORE	200204	OFFICE MANAGEMENT AND SUPERVISION	02- ASSOCIATES DEGREE	FAIL			14.65	2960	20254	FAIL	114.23	2960	2590	FAIL	13.63	2763	20254	FAIL	106.23	2763	2590	FAIL	19668	20254	
023613	LANDING SCHOOL	ARUNDEL	ME	040461400	PRIVATE, NOT-FOR-PROFIT 2 TO 3 YEARS	478616	MAIRINE MAINTENANCE/FITTER AND SHIP REPAIR TECHNOLOGY/TECHNICIAN	01- UNDERGRADUATE CERTIFICATE	PASS			4.98	1311	26394	PASS	15.15	1311	8743	PASS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	26394	24511	
023613	LANDING SCHOOL	ARUNDEL	ME	040461400	PRIVATE, NOT-FOR-PROFIT 2 TO 3 YEARS	478616	WOODWORKING, OTHER	01- UNDERGRADUATE CERTIFICATE	PASS			4.96	1311	26438	PASS	14.96	1311	8649	PASS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	26394	24511
023614	COLLIN COUNTY COMMUNITY COLLEGE	MCKINNEY	TX	750780001	PUBLIC 2 TO 3 YEARS OR MORE	430203	FIRE SCIENCE/FIRE-FIGHTING	01- UNDERGRADUATE CERTIFICATE	PASS			0.34	182	52183	PASS	0.52	182	34528	PASS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	11820	52183
023616	CONCORDIA CAREER COLLEGE	KANSAS CITY	MO	641112407	PROPRIETARY 4 YEARS OR MORE	510601	DENTAL ASSISTING/ASSISTANT	01- UNDERGRADUATE CERTIFICATE	PASS			6.11	1204	19893	PASS	59.07	1204	2038	FAIL	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	19857	19893
023616	CONCORDIA CAREER COLLEGE	KANSAS CITY	MO	641112407	PROPRIETARY 4 YEARS OR MORE	110602	DENTAL HYGIENE/HYGIENIST	02- ASSOCIATES DEGREE	PASS			8.52	4126	48393	ZONE	13.42	4126	30742	PASS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	47755	48393
023616	CONCORDIA CAREER COLLEGE	KANSAS CITY	MO	641112407	PROPRIETARY 4 YEARS OR MORE	110710	MEDICAL OFFICE ASSISTANT/SPECIALIST	01- UNDERGRADUATE CERTIFICATE	PASS			6.53	1313	20052	PASS	54.69	1313	2397	FAIL	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	19798	20052
023616	CONCORDIA CAREER COLLEGE	KANSAS CITY	MO	641112407	PROPRIETARY 4 YEARS OR MORE	110805	MEDICAL/LINICAL ASSISTANT	01- UNDERGRADUATE CERTIFICATE	PASS			7.05	1256	17798	PASS	878.32	1256	141	FAIL	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	17798	17798
023616	CONCORDIA CAREER COLLEGE	KANSAS CITY	MO	641112407	PROPRIETARY 4 YEARS OR MORE	510908	RESPIRATORY CARE THERAPY/THERAPIST	02- ASSOCIATES DEGREE	PASS			7.05	2700	38249	PASS	13.11	2700	20594	PASS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	38249	38249	
023616	CONCORDIA CAREER COLLEGE	KANSAS CITY	MO	641112407	PROPRIETARY 4 YEARS OR MORE	518001	REGISTERED NURSING/REGISTERED NURSE	02- ASSOCIATES DEGREE	PASS			5.33	2761	51785	PASS	8.08	2761	34130	PASS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	51785	51785	
023616	CONCORDIA CAREER COLLEGE	KANSAS CITY	MO	641112407	PROPRIETARY 4 YEARS OR MORE	518001	LICENSED PRACTICAL/VOCATIONAL NURSE TRAINING	01- UNDERGRADUATE CERTIFICATE	PASS			7.09	2654	37383	PASS	13.45	2654	19728	PASS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	34534	37383
023620	UNIVERSAL TECHNICAL INSTITUTE	HOUSTON	TX	770739986	PROPRIETARY 2 TO 3 YEARS	478603	AUTOMOBILE/COLLISSION AND REPAIR TECHNOLOGY/TECHNICIAN	01- UNDERGRADUATE CERTIFICATE	PASS			7.66	2240	29222	PASS	19.96	2240	11567	PASS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	29222	27066
023620	UNIVERSAL TECHNICAL INSTITUTE	HOUSTON	TX	770739986	PROPRIETARY 2 TO 3 YEARS	478604	Automotive/Automotive Mechanics Technology/Technician	01- UNDERGRADUATE CERTIFICATE	PASS			6.64	2337	35179	PASS	13.33	2337	17524	PASS	N/A	N/A	N/A	N/A	N/A	N/A					

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Institution Code (State-Inst ID)	Institution Name	City	State	Zip	Institution Type	CIP Code	CIP Name	Credential Level	Original Program Pwz/Fall	Appeal Status	Debt-to-Earnings Annual Rate	Debt-to-Earnings Annual Rate Numerator	Debt-to-Earnings Annual Rate Denominator	Debt-to-Earnings Annual Rate Pass/Fail/Zone	Debt-to-Earnings Discretionary Income Rate	Debt-to-Earnings Discretionary Income Rate Numerator	Debt-to-Earnings Discretionary Income Rate Denominator	Debt-to-Earnings Transitional Rate	Debt-to-Earnings Transitional Rate Numerator	Debt-to-Earnings Transitional Rate Denominator	Earnings Transitioned Income Rate	Earnings Transitioned Income Rate Numerator	Earnings Transitioned Income Rate Denominator	Mean Annual Earnings				
030265	REMINGTON COLLEGE	GARLAND	TX	75041993	PRIVATE, NOT-FOR PROFIT 4 YEARS OR MORE	120401	COSMETOLOGY/COSMETOLOGIST, GENERAL	01 - UNDERGRADUATE CERTIFICATE	FAIL		14.33	1835	12800	FAIL	100	1835	0	FAIL	15.9	2036	12800	FAIL	100	2036	0	FAIL	12800	12130
030265	REMINGTON COLLEGE	GARLAND	TX	75041993	PRIVATE, NOT-FOR PROFIT 4 YEARS OR MORE	150399	ELECTRICAL AND ELECTRONIC ENGINEERING TECHNOLOGIES/TECHNICIAN, OTHER	01 - UNDERGRADUATE CERTIFICATE	PASS		6.81	1731	25404	PASS	22.33	1731	7749	ZONE	N/A	N/A	N/A	N/A	N/A	N/A	25404	22110		
030265	REMINGTON COLLEGE	GARLAND	TX	75041993	PRIVATE, NOT-FOR PROFIT 4 YEARS OR MORE	51301	DRAFTING AND DESIGN TECHNOLOGY/TECHNICAL, GENERAL	01 - UNDERGRADUATE CERTIFICATE	PASS		4.29	1146	26853	PASS	12.73	1146	8998	PASS	N/A	N/A	N/A	N/A	N/A	N/A	26853	25708		
030265	REMINGTON COLLEGE	GARLAND	TX	75041993	PRIVATE, NOT-FOR PROFIT 4 YEARS OR MORE	105501	HEATING AND PHYSICAL EDUCATION/TRNSG, GENERAL	01 - UNDERGRADUATE CERTIFICATE	PASS		6.47	1290	20073	PASS	53.72	1290	2419	FAIL	N/A	N/A	N/A	N/A	N/A	N/A	20077	17708		
030265	REMINGTON COLLEGE	GARLAND	TX	75041993	PRIVATE, NOT-FOR PROFIT 4 YEARS OR MORE	470301	MECHANICAL AIR CONDITIONING, VENTILATION AND REFRIGERATION MAINTENANCE TECHNOLOGY/TECHNICIAN	01 - UNDERGRADUATE CERTIFICATE	PASS		6.55	1283	19561	PASS	67.31	1283	1906	FAIL	N/A	N/A	N/A	N/A	N/A	N/A	19561	17308		
030265	REMINGTON COLLEGE	GARLAND	TX	75041993	PRIVATE, NOT-FOR PROFIT 4 YEARS OR MORE	150601	Dental Assistant/Assistant.	01 - UNDERGRADUATE CERTIFICATE	PASS		6.39	1252	19900	PASS	64.7	1252	1953	FAIL	N/A	N/A	N/A	N/A	N/A	N/A	19900	19276		
030265	REMINGTON COLLEGE	GARLAND	TX	75041993	PRIVATE, NOT-FOR PROFIT 4 YEARS OR MORE	150713	MEDICAL INSURANCE CODING SPECIALIZODDER	01 - UNDERGRADUATE CERTIFICATE	PASS		6.48	1260	19556	PASS	66.75	1260	1903	FAIL	N/A	N/A	N/A	N/A	N/A	N/A	19556	19273		
030265	REMINGTON COLLEGE	GARLAND	TX	75041993	PRIVATE, NOT-FOR PROFIT 4 YEARS OR MORE	150801	MEDICAL CLINICAL ASSISTANT.	01 - UNDERGRADUATE CERTIFICATE	PASS		7.69	1290	16495	PASS	100	1269	0	FAIL	N/A	N/A	N/A	N/A	N/A	N/A	16495	16043		
030265	REMINGTON COLLEGE	GARLAND	TX	75041993	PRIVATE, NOT-FOR PROFIT 4 YEARS OR MORE	150805	PHARMACY TECHNICIAN/ASSISTANT.	01 - UNDERGRADUATE CERTIFICATE	PASS		6.40	1260	19063	PASS	63.10	1260	2008	FAIL	N/A	N/A	N/A	N/A	N/A	N/A	19063	16043		
030265	REMINGTON COLLEGE	GARLAND	TX	75041993	PRIVATE, NOT-FOR PROFIT PROPRIETARY 2 TO 3 YEARS	151501	MASSAGE THERAPY/THERAPEUTIC MASSAGE.	01 - UNDERGRADUATE CERTIFICATE	ZONE		8.88	1208	14444	ZONE	100	1298	0	FAIL	9.07	1311	14441	ZONE	100	1311	0	FAIL	14441	11261
030271	FAIRVIEW ACADEMY	FAIRVIEW PARK	DH	44426224	PROPRIETARY LESS THAN 2 YEARS	120401	COSMETOLOGY/COSMETOLOGIST, GENERAL	01 - UNDERGRADUATE CERTIFICATE	PASS		0	6	16101	PASS	0	0	0	PASS	N/A	N/A	N/A	N/A	N/A	N/A	16101	12970		
030271	BLADES SCHOOL OF HAIR DESIGN	CALIFORNIA	MD	20610023	PROPRIETARY LESS THAN 2 YEARS	120401	COSMETOLOGY/COSMETOLOGIST, GENERAL	01 - UNDERGRADUATE CERTIFICATE	PASS		6.72	1079	16043	PASS	100	1079	0	FAIL	N/A	N/A	N/A	N/A	N/A	N/A	16043	14841		
030274	KENON INTERNATIONAL ACADEMY III	AURORA	CO	80014139	PROPRIETARY 2 TO 3 YEARS	120401	COSMETOLOGY/COSMETOLOGIST, GENERAL	01 - UNDERGRADUATE CERTIFICATE	FAIL	A -	13.59	2222	16348	FAIL	100	2222	0	FAIL	14.33	2344	16348	FAIL	100	2344	0	FAIL	16348	15588
030274	SENIOR INTERNATIONAL ACADEMY III	AURORA	CO	80514139	PROPRIETARY 2 TO 3 YEARS	120409	NESTHTC/NAC/IETHSTHCAN AND SKIN CARE SPECIALIST.	01 - UNDERGRADUATE CERTIFICATE	PASS		4.14	743	17914	PASS	286.87	743	210	FAIL	N/A	N/A	N/A	N/A	N/A	N/A	17914	16055		
030277	PACIFIC COLLEGE OF ORIENTAL MEDICINE	SAN DIEGO	CA	92104848	PROPRIETARY 4 YEARS OR MORE	151301	ACUPUNCTURE AND ORIENTAL MEDICINE.	01 - MASTERS DEGREE	PASS		A - 23.8	6299	26457	FAI	71.56	6299	8802	FAIL	27.11	7174	26457	FAIL	81.5	7174	8802	FAI	26457	20262
030277	PACIFIC COLLEGE OF ORIENTAL MEDICINE	SAN DIEGO	CA	92104848	PROPRIETARY 4 YEARS OR MORE	151502	ASIAN BODYWORK THERAPY.	01 - UNDERGRADUATE CERTIFICATE	ZONE	A -	9.95	1785	17028	ZONE	653.84	1785	273	FAIL	N/A	N/A	N/A	N/A	N/A	N/A	1785	14045		
030277	PACIFIC COLLEGE OF ORIENTAL MEDICINE	SAN DIEGO	CA	92104848	PROPRIETARY 4 YEARS OR MORE	151502	ASIAN BODYWORK THERAPY.	02 - ASSOCIATES DEGREE	PASS		A - 12.6	2797	22151	FAIL	51.66	2797	43	FAIL	N/A	N/A	N/A	N/A	N/A	N/A	2797	14045		
030292	NU TEK ACADEMY OF BEAUTY	MOUNT STERLING	KY	40353702	PROPRIETARY 2 TO 3 YEARS	120401	COSMETOLOGY/COSMETOLOGIST, GENERAL	01 - UNDERGRADUATE CERTIFICATE	PASS		0	0	12145	PASS	0	0	0	PASS	N/A	N/A	N/A	N/A	N/A	N/A	12145	11950		
030297	UNIVERSAL TECHNOLOGY COLLEGE OF PUERTO RICO	AGUADILLA, PR	PR	00603195	PRIVATE, NOT-FOR PROFIT 4 YEARS OR MORE	151303	MECTRUCTURAL DRAFTING AND ARCHITECTURAL CAD/CADD.	01 - UNDERGRADUATE CERTIFICATE	PASS		0	6	15199	PASS	0	0	0	PASS	N/A	N/A	N/A	N/A	N/A	N/A	15199	11216		
030297	UNIVERSAL TECHNOLOGY COLLEGE OF PUERTO RICO	AGUADILLA, PR	PR	00603195	PRIVATE, NOT-FOR PROFIT 4 YEARS OR MORE	501205	ENTOMOLOGY.	01 - UNDERGRADUATE CERTIFICATE	PASS		0	5499	PASS	0	0	0	PASS	N/A	N/A	N/A	N/A	N/A	N/A	5499	0			
030297	UNIVERSAL TECHNOLOGY COLLEGE OF PUERTO RICO	AGUADILLA, PR	PR	00603195	PRIVATE, NOT-FOR PROFIT 4 YEARS OR MORE	460302	ELECTRICIAN.	01 - UNDERGRADUATE CERTIFICATE	PASS		0	12179	PASS	0	0	0	PASS	N/A	N/A	N/A	N/A	N/A	N/A	12179	831			
030297	UNIVERSAL TECHNOLOGY COLLEGE OF PUERTO RICO	AGUADILLA, PR	PR	00603195	PRIVATE, NOT-FOR PROFIT 4 YEARS OR MORE	72023	COMMUNICATIONS SYSTEMS INSTALLATION AND REPAIR TECHNOLOGY.	01 - UNDERGRADUATE CERTIFICATE	PASS		0	6514	PASS	0	0	0	PASS	N/A	N/A	N/A	N/A	N/A	N/A	6514	87			
030297	UNIVERSAL TECHNOLOGY COLLEGE OF PUERTO RICO	AGUADILLA, PR	PR	00603195	PRIVATE, NOT-FOR PROFIT 4 YEARS OR MORE	470201	MECHANICAL AIR CONDITIONING, VENTILATION AND REFRIGERATION MAINTENANCE TECHNOLOGY/TECHNICIAN.	01 - UNDERGRADUATE CERTIFICATE	PASS		0	11832	PASS	0	0	0	PASS	N/A	N/A	N/A	N/A	N/A	N/A	11832	8037			
030297	UNIVERSAL TECHNOLOGY COLLEGE OF PUERTO RICO	AGUADILLA, PR	PR	00603195	PRIVATE, NOT-FOR PROFIT 4 YEARS OR MORE	400408	INTERIOR DESIGN.	01 - UNDERGRADUATE CERTIFICATE	PASS		0	6050	PASS	0	0	0	PASS	N/A	N/A	N/A	N/A	N/A	N/A	6050	0			
030297	UNIVERSAL TECHNOLOGY COLLEGE OF PUERTO RICO	AGUADILLA, PR	PR	00603195	PRIVATE, NOT-FOR PROFIT 4 YEARS OR MORE	150714	MEDICAL INSURANCE SPECIALST/MEDICAL BILLER.	01 - UNDERGRADUATE CERTIFICATE	PASS		0	6727	PASS	0	0	0	PASS	N/A	N/A	N/A	N/A	N/A	N/A	6727	1409			
030297	UNIVERSAL TECHNOLOGY COLLEGE OF PUERTO RICO	AGUADILLA, PR	PR	00603195	PRIVATE, NOT-FOR PROFIT 4 YEARS OR MORE	510904	EMERGENCY MEDICAL TECHNOLOGY/TECHNICIAN (EMT PARAMEDIC)	01 - UNDERGRADUATE CERTIFICATE	PASS		0	8646	PASS	0	0	0	PASS	N/A	N/A	N/A	N/A	N/A	N/A	8646	1124			
030297	UNIVERSAL TECHNOLOGY COLLEGE OF PUERTO RICO	AGUADILLA, PR	PR	00603195	PRIVATE, NOT-FOR PROFIT 4 YEARS OR MORE	11818	NURSING PRACTICE.	01 - UNDERGRADUATE CERTIFICATE	PASS		0	8639	PASS	0	0	0	PASS	N/A	N/A	N/A	N/A	N/A	N/A	8639	205			
030299	CONSOLIDATED SCHOOL OF BUSINESS	LANCASTER	PA	176032189	PROPRIETARY 2 TO 3 YEARS	120718	MEDICAL ADMINISTRATIVE/EXECUTIVE ASSISTANT AND MEDICAL SECRETARY	02 - ASSOCIATES DEGREE	PASS		15.88	6633	20808	PASS	43.79	1180	3153	FAIL	N/A	N/A	N/A	N/A	N/A	N/A	17815	20808		
030299	CONSOLIDATED SCHOOL OF BUSINESS	LANCASTER	PA	176032189	PROPRIETARY 2 TO 3 YEARS	520035	BUSINESS ADMINISTRATION AND MANAGEMENT, GENERAL.	02 - ASSOCIATES DEGREE	PASS		7.41	1657	22353	PASS	35.27	1657	4688	FAIL	N/A	N/A	N/A	N/A	N/A	N/A	22353	21448		
030300	OSGECHE TECHNICAL COLLEGE	STATESBORO	GA	304580849	PUBLIC 2 TO 3 YEARS	120401	COSMETOLOGY/COSMETOLOGIST, GENERAL.	01 - UNDERGRADUATE CERTIFICATE	PASS		0	12705	PASS	0	0	0	PASS	N/A	N/A	N/A	N/A	N/A	N/A	12705	9700			
030300	OSGECHE TECHNICAL COLLEGE	STATESBORO	GA	304580849	PUBLIC 2 TO 3 YEARS	430107	CRIMINAL JUSTICE/POLICE SCIENCE.	01 - UNDERGRADUATE CERTIFICATE	PASS		0	32636	PASS	0	0	14981	PASS	N/A	N/A	N/A	N/A	N/A	N/A	32636	11030			
030300	OSGECHE TECHNICAL COLLEGE	STATESBORO	GA	304580849	PUBLIC 2 TO 3 YEARS	460302	ELECTRICIAN.	01 - UNDERGRADUATE CERTIFICATE	PASS		0	32066	PASS	0	0	14411	PASS	N/A	N/A	N/A	N/A	N/A	N/A	32066	29642			
030300	OSGECHE TECHNICAL COLLEGE	STATESBORO	GA	304580849	PUBLIC 2 TO 3 YEARS	150801	MEDICAL/CLINICAL ASSISTANT.	01 - UNDERGRADUATE CERTIFICATE	PASS		0	18386	PASS	0	0	731	PASS	N/A	N/A	N/A	N/A	N/A	N/A	18386	15886			
030300	OSGECHE TECHNICAL COLLEGE	STATESBORO	GA	304580849	PUBLIC 2 TO 3 YEARS	150805	PHARMACY TECHNICIAN/ASSISTANT.	01 - UNDERGRADUATE CERTIFICATE	PASS		0	23867	PASS	0	0	6052	PASS	N/A	N/A	N/A	N/A	N/A	N/A	23867	14451			
030300	OSGECHE TECHNICAL COLLEGE	STATESBORO	GA	304580849	PUBLIC 2 TO 3 YEARS	510899	ALLIED HEALTH AND MEDICAL ASSISTING SERVICES, OTHER.	01 - UNDERGRADUATE CERTIFICATE	PASS		0	24660	PASS	0	0	7005	PASS	N/A	N/A	N/A	N/A	N/A	N/A	24660	24860			
030300	OSGECHE TECHNICAL COLLEGE	STATESBORO	GA	304580849	PUBLIC 2 TO 3 YEARS	510909	SURGICAL TECHNOLOGY/TECHNOLOGIST.	01 - UNDERGRADUATE CERTIFICATE	PASS		0	28858	PASS	0	0	11003	PASS	N/A	N/A	N/A	N/A	N/A	N/A	28858	28658			
030300	OSGECHE TECHNICAL COLLEGE	STATESBORO	GA	304580849	PUBLIC 2 TO 3 YEARS	511009	PHLEBOTOMY TECHNICIAN/PHLEBOTOMIST.	01 - UNDERGRADUATE CERTIFICATE	PASS		0	11886	PASS	0	0	0	PASS	N/A	N/A	N/A	N/A	N/A	N/A	11886	8122			
030300	OSGECHE TECHNICAL COLLEGE	STATESBORO	GA	304580849	PUBLIC 2 TO 3 YEARS	513801	SCENED PRACTICAL/VOCATIONAL NURSE TRAINING.	01 - UNDERGRADUATE CERTIFICATE	PASS		0	36316	PASS	0	0	18461	PASS	N/A	N/A	N/A	N/A	N/A	N/A	36316	36316			
030300	OSGECHE TECHNICAL COLLEGE	STATESBORO	GA	304580849	PUBLIC 2 TO 3 YEARS	420802	ACCOUNTING TECHNOLOGY/TECHNICIAN AND BOOKKEEPING.	01 - UNDERGRADUATE CERTIFICATE	PASS		0	19124	PASS	0	0	1889	PASS	N/A	N/A	N/A	N/A	N/A	N/A	19124	1983			
030306	UTAH COLLEGE OF MASSAGE THERAPY	SALT LAKE CITY UT	UT	841111668	PROPRIETARY LESS THAN 2 YEARS	220409	ASTHETICIAN/ESTHETICIAN AND SKIN CARE SPECIALIST.	01 - UNDERGRADUATE CERTIFICATE	PASS		6.13	1019	16618	PASS	100	1019	0	FAIL	N/A	N/A	N/A	N/A	N/A	N/A	16618	15444		
030306	UTAH COLLEGE OF MASSAGE THERAPY	SALT LAKE CITY UT	UT	841111668	PROPRIETARY LESS THAN 2 YEARS	511503	MASSAGE THERAPY/THERAPEUTIC MASSAGE.	01 - UNDERGRADUATE CERTIFICATE	PASS		6.62	1200	18115	PASS	30.86	1200	460	FAIL	N/A	N/A	N/A	N/A	N/A	N/A	18115	10506		
030307	OKLAHOMA SCHOOL OF PHOTOGRAPHY	MOORE	OK	731033320	PROPRIETARY LESS THAN 2 YEARS	460305	PHOTOGRAPHY.	01 - UNDERGRADUATE CERTIFICATE	PASS		10.22	1311	12818	ZONE	100	1311	0	FAIL	7.87	1010	12818	PASS	100	1010	0	FAIL	12818	9379
030308	AMERICAN BROADCASTING SCHOOL	OKLAHOMA CITY	OK	731153312	PROPRIETARY LESS THAN 2 YEARS	460701	RADIO AND TELEVISION.	01 - UNDERGRADUATE CERTIFICATE	PASS		2.67	520	19408	PASS	28.69	520	1751	ZONE	N/A	N/A	N/A	N/A	N/A	N/A	19408	16630		
030309	DIESEL DRIVING ACADEMY	BATON ROUGE LA	LA	708158109	PROPRIETARY LESS THAN 2 YEARS	490205	TRUCK AND BUS DRIVER/COMMERCIAL VEHICLE OPERATOR AND INSTRUCTOR.	01 - UNDERGRADUATE CERTIFICATE	PASS		2.95	874	29567	PASS	7.31	874	11912	PASS	N/A	N/A	N/A	N/A	N/A	N/A	29567	28019		
030314	SANFORD BROWN COLLEGE	TAMPA	FL	336074809	PROPRIETARY 4 YEARS OR MORE	900063	ADVERTISING.	03 - BACHELORS DEGREE	ZONE		11.63	3742	32163	ZONE	25.79	3742	14503	ZONE	N/A	N/A	N/A	N/A	N/A	N/A	32163	28019		
030314	SANFORD BROWN COLLEGE	TAMPA	FL	336074809	PROPRIETARY 4 YEARS OR MORE	120203	RECORDING ARTS TECHNOLOGY/TECHNOLOGIAN.	03 - BACHELORS DEGREE	FAIL		21.88	5092	23143	FAIL	92.44	5092	5088	FAIL	20.78	4814	23143	FAIL	87.4	4814	5508	FAIL	23143	21180
030314	SANFORD BROWN COLLEGE	TAMPA	FL	336074809	PROPRIETARY 4 YEARS OR MORE	430004	ANIMATION, INTERACTIVE TECHNOLOGY, VIDEO GRAPHICS AND SPECIAL EFFECTS.	03 - BACHELORS DEGREE	FAIL		16.14	3354	20779	FAIL	107.39	3354	3123	FAIL	N/A	N/A	N/A	N/A	N/A	N/A	20779	17904		
030314	SANFORD BROWN COLLEGE	TAMPA	FL	336074809	PROPRIETARY 4 YEARS OR MORE	150801	WEB PAGE, DIGITAL/MULTIMEDIA AND INFORMATION RESOURCES DESIGN.	02 - ASSOCIATES DEGREE	ZONE		12.74	3480	27300	FAIL	36.08	3480	9645	FAIL	8.17	2233	27300	ZONE	23.15	2233	9645	ZONE	27300	18934
030314	SANFORD BROWN COLLEGE	TAMPA	FL	336074809	PROPRIETARY 4 YEARS OR MORE	110801	WEB PAGE, DIGITAL/MULTIMEDIA AND INFORMATION RESOURCES DESIGN.	03 - BACHELORS DEGREE	PASS		13.21	5167	39086	FAIL	24.1	5167	21431	ZONE	9.45	3894	39086	ZONE	17.23	3894	21431	PASS	39086	34618
030314	SANFORD BROWN COLLEGE	TAMPA	FL	336074809	PROPRIETARY 4 YEARS OR MORE	205051	BAKING AND PASTRY ARTS/BAKE/PASTRY CHEF.	01 - UNDERGRADUATE CERTIFICATE	PASS		7.25	1284	17697	PASS	999.99	1284												

ID	Institution Name	City	State	Zip	Institution Type	CIP Code	CIP Name	Credential Level	Official Program Pwz/Fall	Appeal Status	Debt-to-Earnings Annual Ratio	Debt-to-Earnings Annual Rate Numerator	Debt-to-Earnings Annual Rate Denominator	Debt-to-Earnings Annual Rate Pass/Fail/Zone	Debt-to-Earnings Disciplinary Income Rate Numerator	Debt-to-Earnings Disciplinary Income Rate Pass/Fail/Zone	Debt-to-Earnings Disciplinary Income Rate Numerator	Debt-to-Earnings Disciplinary Income Rate Pass/Fail/Zone	Debt-to-Earnings Transitional Income Rate Numerator	Debt-to-Earnings Transitional Income Rate Pass/Fail/Zone	Debt-to-Earnings Transitional Income Rate Numerator	Debt-to-Earnings Transitional Income Rate Pass/Fail/Zone	Mean Annual Earnings	Median Annual Earnings					
030342	WASHINGTON COUNTY CAREER CENTER ADULT EDUCATION	MARIETTA	DH	45759020	PUBLIC 2 TO 3 YEARS	460201	CARPENTRY/CARPENTER.	01- UNDERGRADUATE CERTIFICATE	PASS		0	0	1917	PASS	0	0	2062	PASS	N/A	N/A	N/A	N/A	N/A	19727	16000				
030342	WASHINGTON COUNTY CAREER CENTER ADULT EDUCATION	MARIETTA	DH	45759020	PUBLIC 2 TO 3 YEARS	460415	BUILDING CONSTRUCTION TECHNOLOGY.	01- UNDERGRADUATE CERTIFICATE	PASS		0	0	34554	PASS	0	0	16899	PASS	N/A	N/A	N/A	N/A	N/A	34554	32332				
030342	WASHINGTON COUNTY CAREER CENTER ADULT EDUCATION	MARIETTA	DH	45759020	PUBLIC 2 TO 3 YEARS	470105	ELECTRONIC ELECTRICALS TECHNOLOGY/TECHNICIAN	01- UNDERGRADUATE CERTIFICATE	PASS		0	0	51853	PASS	0	0	33998	PASS	N/A	N/A	N/A	N/A	N/A	51853	49919				
030342	WASHINGTON COUNTY CAREER CENTER ADULT EDUCATION	MARIETTA	DH	45759020	PUBLIC 2 TO 3 YEARS	470201	HEATING, AIR CONDITIONING, VENTILATION AND REFRIGERATION MAINTENANCE TECHNOLOGY/TECHNICIAN	01- UNDERGRADUATE CERTIFICATE	PASS		0	0	34740	PASS	0	0	17089	PASS	N/A	N/A	N/A	N/A	N/A	34740	27819				
030342	WASHINGTON COUNTY CAREER CENTER ADULT EDUCATION	MARIETTA	DH	45759020	PUBLIC 2 TO 3 YEARS	138051	MEDICAL CLINICAL ASSISTANT	01- UNDERGRADUATE CERTIFICATE	PASS		0	0	14742	PASS	0	0	0	PASS	N/A	N/A	N/A	N/A	N/A	13009	14742				
030344	CONSERVATORS OF RECORDING ARTS & SCIENCES	TEMPE	AZ	85281707	2 YEARS	520203	RECORDING ARTS TECHNOLOGY/TECHNICIAN.	01- UNDERGRADUATE CERTIFICATE	PASS		7.89	1674	21193	PASS	47.31	1674	3538	FAIL	N/A	N/A	N/A	N/A	N/A	21193	19407				
030345	OWENSBORO COMMUNITY & TECHNICAL COLLEGE	OWENSBORO	KY	42301889	PUBLIC 2 TO 3 YEARS	460302	ELECTRICIAN	01- UNDERGRADUATE CERTIFICATE	PASS		0	0	52221	PASS	0	0	14568	PASS	N/A	N/A	N/A	N/A	N/A	49151	52221				
030345	OWENSBORO COMMUNITY & TECHNICAL COLLEGE	OWENSBORO	KY	42301889	PUBLIC 2 TO 3 YEARS	520402	EXECUTIVE ASSISTANT/EXECUTIVE SECRETARY.	01- UNDERGRADUATE CERTIFICATE	PASS		0	0	22133	PASS	0	0	4477	PASS	N/A	N/A	N/A	N/A	N/A	22133	21495				
030352	TWIST COLLEGE OF MAKEUP & COSMETOLOGY	DANIEL PHAMIE	TX	75051480	PROPRIETARY LESS THAN 2 YEARS	220401	COSMETOLOGY/COSMETOLOGIST, GENERAL	01- UNDERGRADUATE CERTIFICATE	PASS		3.79	598	15763	PASS	100	598	598	0	FAIL	N/A	N/A	N/A	N/A	15763	14008				
030353	SOUTHERN CAREERS INSTITUTE	AUSTIN	TX	78704252	PROPRIETARY LESS THAN 2 YEARS	220401	COSMETOLOGY/COSMETOLOGIST, GENERAL	01- UNDERGRADUATE CERTIFICATE	PASS		5.69	523	10256	PASS	100	523	0	FAIL	N/A	N/A	N/A	N/A	N/A	10256	9417				
030353	SOUTHERN CAREERS INSTITUTE	AUSTIN	TX	78704252	PROPRIETARY LESS THAN 2 YEARS	220410	NAIL TECHNICIAN/SPECIALIST AND MANICURIST	01- UNDERGRADUATE CERTIFICATE	PASS		4.75	512	10773	PASS	100	512	0	FAIL	N/A	N/A	N/A	N/A	N/A	10773	5337				
030353	SOUTHERN CAREERS INSTITUTE	AUSTIN	TX	78704252	PROPRIETARY LESS THAN 2 YEARS	10710	MEDICAL OFFICE ASSISTANT/SPECIALIST.	01- UNDERGRADUATE CERTIFICATE	PASS		5.18	707	13636	PASS	100	707	0	FAIL	N/A	N/A	N/A	N/A	N/A	13105	13636				
030353	SOUTHERN CAREERS INSTITUTE	AUSTIN	TX	78704252	PROPRIETARY LESS THAN 2 YEARS	130713	MEDICAL INSURANCE CODING SPECIALIST/CODER.	01- UNDERGRADUATE CERTIFICATE	PASS		5.78	977	16890	PASS	100	977	0	FAIL	N/A	N/A	N/A	N/A	N/A	16595	16890				
030353	SOUTHERN CAREERS INSTITUTE	AUSTIN	TX	78704252	PROPRIETARY LESS THAN 2 YEARS	130714	MEDICAL INSURANCE SPECIALIST/MEDICAL BILLER.	01- UNDERGRADUATE CERTIFICATE	PASS		6.14	1211	19057	PASS	59.3	1211	2042	FAIL	N/A	N/A	N/A	N/A	N/A	18758	19057				
030353	SOUTHERN CAREERS INSTITUTE	AUSTIN	TX	78704252	PROPRIETARY LESS THAN 2 YEARS	138051	MEDICAL CLINICAL ASSISTANT	01- UNDERGRADUATE CERTIFICATE	PASS		6.22	965	15493	PASS	100	965	0	FAIL	N/A	N/A	N/A	N/A	N/A	15493	14967				
030353	SOUTHERN CAREERS INSTITUTE	AUSTIN	TX	78704252	PROPRIETARY LESS THAN 2 YEARS	138055	PHARMACY TECHNICIAN/ASSISTANT.	01- UNDERGRADUATE CERTIFICATE	PASS		4.87	972	19940	PASS	42.53	972	2285	FAIL	N/A	N/A	N/A	N/A	N/A	18321	19940				
030353	SOUTHERN CAREERS INSTITUTE	AUSTIN	TX	78704252	PROPRIETARY LESS THAN 2 YEARS	138051	ACCOUNTING.	01- UNDERGRADUATE CERTIFICATE	PASS		5.62	1036	18420	PASS	135.42	1036	765	FAIL	N/A	N/A	N/A	N/A	N/A	18420	17565				
030353	SOUTHERN CAREERS INSTITUTE	AUSTIN	TX	78704252	PROPRIETARY LESS THAN 2 YEARS	220302	ACCOUNTING TECHNOLOGY/TECHNICIAN AND BOOKKEEPING.	01- UNDERGRADUATE CERTIFICATE	PASS		4.5	866	19328	PASS	55.05	866	1573	FAIL	N/A	N/A	N/A	N/A	N/A	19328	18462				
030353	SOUTHERN CAREERS INSTITUTE	AUSTIN	TX	78704252	PROPRIETARY LESS THAN 2 YEARS	220401	ADMINISTRATIVE ASSISTANT AND SECRETARIAL SERVICE, GENERAL.	01- UNDERGRADUATE CERTIFICATE	PASS		5.17	801	15856	PASS	100	801	0	FAIL	N/A	N/A	N/A	N/A	N/A	15856	15556				
030358	HERITAGE INSTITUTE	JACKSONVILLE	FL	322160948	PROPRIETARY 2 TO 3 YEARS	120408	FACIAL TREATMENT SPECIALIST/ACESTHETICIAN.	02- ASSOCIATES DEGREE	FAIL		14.55	2105	14467	FAIL	100	2105	0	FAIL	N/A	N/A	N/A	N/A	N/A	14467	13015				
030358	HERITAGE INSTITUTE	JACKSONVILLE	FL	322160948	PROPRIETARY 2 TO 3 YEARS	130507	PHYSICAL FITNESS TECHNICIAN.	02- ASSOCIATES DEGREE	ZONE		10.02	2047	20424	ZONE	73.92	2047	2709	FAIL	N/A	N/A	N/A	N/A	N/A	20424	19874				
030358	HERITAGE INSTITUTE	JACKSONVILLE	FL	322160948	PROPRIETARY 2 TO 3 YEARS	131051	MEDICAL CLINICAL ASSISTANT.	02- ASSOCIATES DEGREE	FAIL		12.76	2328	18233	FAIL	402.76	2328	2328	FAIL	13.15	2399	18233	FAIL	415.05	2399	578	18233	17876		
030358	HERITAGE INSTITUTE	JACKSONVILLE	FL	322160948	PROPRIETARY 2 TO 3 YEARS	138055	PHARMACY TECHNICIAN/ASSISTANT.	02- UNDERGRADUATE CERTIFICATE	PASS		5.97	1229	20576	PASS	42.07	1229	2921	FAIL	N/A	N/A	N/A	N/A	N/A	19440	20576				
030358	HERITAGE INSTITUTE	JACKSONVILLE	FL	322160948	PROPRIETARY 2 TO 3 YEARS	539501	MASSAGE THERAPY/THERAPEUTIC MASSAGE.	02- ASSOCIATES DEGREE	FAIL		14.72	2007	14076	FAIL	100	2007	0	FAIL	14.47	2032	14036	FAIL	100	2032	0	FAIL	14036	11130	
030359	NATIONAL AVIATION ACADEMY	CLEARWATER	FL	337603911	PROPRIETARY 2 TO 3 YEARS	470607	AIRFRAME MECHANICS AND AIRCRAFT MAINTENANCE TECHNOLOGY/TECHNICIAN.	01- UNDERGRADUATE CERTIFICATE	PASS		6.27	2817	44870	PASS	10.35	2817	27215	PASS	N/A	N/A	N/A	N/A	N/A	44870	41133				
030359	NATIONAL AVIATION ACADEMY	CLEARWATER	FL	337603911	PROPRIETARY 2 TO 3 YEARS	470609	AVIONICS MAINTENANCE TECHNOLOGY/TECHNICIAN.	01- UNDERGRADUATE CERTIFICATE	PASS		3.67	1712	46553	PASS	5.92	1712	28898	PASS	N/A	N/A	N/A	N/A	N/A	44112	46553				
030375	HODGES UNIVERSITY	NAPLES	FL	341197912	PRIVATE, 4 YEARS OR MORE	310011	ENGLISH LANGUAGE AND LITERATURE, GENERAL.	01- UNDERGRADUATE CERTIFICATE	PASS		0	0	15517	PASS	0	0	0	PASS	N/A	N/A	N/A	N/A	N/A	15517	13742				
030399	FREIMONT COLLEGE	CERRITOS	CA	947039340	PROPRIETARY 4 YEARS OR MORE	220302	LEGAL ASSISTANT/PARALEGAL.	02- ASSOCIATES DEGREE	ZONE		11.27	2578	22881	ZONE	49.51	2578	5208	FAIL	14.21	3250	22861	FAIL	62.42	3250	5206	FAIL	22020	22881	
030399	FREIMONT COLLEGE	CERRITOS	CA	947039340	PROPRIETARY 4 YEARS OR MORE	12309	THERAPEUTIC RECREATION/RECREATIONAL THERAPY.	02- ASSOCIATES DEGREE	FAIL		13.25	2352	19381	FAIL	133.52	2352	2532	FAIL	16.49	3165	19937	FAIL	206.99	3165	1532	FAIL	19937	16198	
030399	FREIMONT COLLEGE	CERRITOS	CA	947039340	PROPRIETARY 4 YEARS OR MORE	138055	MASSAGE THERAPY/THERAPEUTIC MASSAGE.	01- UNDERGRADUATE CERTIFICATE	PASS		7.96	1572	19731	PASS	75.72	1572	2070	FAIL	N/A	N/A	N/A	N/A	N/A	19731	17375				
030425	CARRINGTON COLLEGE	PORTLAND	OR	972121302	PROPRIETARY 2 TO 3 YEARS	130601	DENTAL ASSISTING/ASSISTANT.	01- UNDERGRADUATE CERTIFICATE	PASS		5.5	1164	21137	PASS	33.42	1164	3482	FAIL	N/A	N/A	N/A	N/A	N/A	19481	21137				
030425	CARRINGTON COLLEGE	PORTLAND	OR	972121302	PROPRIETARY 2 TO 3 YEARS	150602	DENTAL HYGIENE/HYGIENIST.	02- ASSOCIATES DEGREE	PASS		8.44	4815	56994	ZONE	12.23	4815	9393	PASS	N/A	N/A	N/A	N/A	N/A	51371	56994				
030425	CARRINGTON COLLEGE	PORTLAND	OR	972121302	PROPRIETARY 2 TO 3 YEARS	130714	MEDICAL INSURANCE SPECIALIST/MEDICAL BILLER.	01- UNDERGRADUATE CERTIFICATE	PASS		6.47	1311	20260	PASS	59.32	1311	2605	FAIL	N/A	N/A	N/A	N/A	N/A	19765	20260				
030425	CARRINGTON COLLEGE	PORTLAND	OR	972121302	PROPRIETARY 2 TO 3 YEARS	138051	MEDICAL CLINICAL ASSISTANT.	01- UNDERGRADUATE CERTIFICATE	PASS		6.5	1311	20557	PASS	52.99	1311	2950	FAIL	N/A	N/A	N/A	N/A	N/A	19520	20557				
030425	CARRINGTON COLLEGE	PORTLAND	OR	972121302	PROPRIETARY 2 TO 3 YEARS	138055	PHARMACY TECHNICIAN/ASSISTANT.	01- UNDERGRADUATE CERTIFICATE	PASS		4.86	1305	20842	PASS	14.2	1305	1987	PASS	N/A	N/A	N/A	N/A	N/A	21785	20842				
030425	CARRINGTON COLLEGE	PORTLAND	OR	972121302	PROPRIETARY 2 TO 3 YEARS	138088	ALTERNATIVE/NATURAL HEALTH TECHNOLOGY/TECHNICIAN AND VETERINARY ASSISTANT	01- UNDERGRADUATE CERTIFICATE	PASS		7.46	1210	18216	PASS	100	1210	0	FAIL	N/A	N/A	N/A	N/A	N/A	14774	18216				
030425	CARRINGTON COLLEGE	PORTLAND	OR	972121302	PROPRIETARY 2 TO 3 YEARS	130907	MEDICAL RADIOLOGIC TECHNOLOGY/SCIENCE - RADIATION THERAPIST.	02- ASSOCIATES DEGREE	PASS		8.96	4488	50040	ZONE	13.85	4488	13385	PASS	N/A	N/A	N/A	N/A	N/A	47880	50040				
030425	CARRINGTON COLLEGE	PORTLAND	OR	972121302	PROPRIETARY 2 TO 3 YEARS	138051	MASSAGE THERAPY/THERAPEUTIC MASSAGE.	01- UNDERGRADUATE CERTIFICATE	PASS		8.62	1311	15133	ZONE	100	1311	0	FAIL	6.94	1055	15133	PASS	100	1055	0	FAIL	15133	14660	
030425	CARRINGTON COLLEGE	PORTLAND	OR	972121302	PROPRIETARY 2 TO 3 YEARS	131801	LICENSED PRACTICAL/VOCATIONAL NURSE TRAINING.	01- UNDERGRADUATE CERTIFICATE	PASS		6.71	2623	39080	PASS	12.24	2623	21425	PASS	N/A	N/A	N/A	N/A	N/A	37261	39080				
030428	SCHOOL BOARD - CITY OF VIA BEACH, VIA BEACH SCHOOL OF PRACT. NRS	VIRGINIA BEACH	VA	234650008	PUBLIC 2 TO 3 YEARS	531895	LICENSED PRACTICAL/VOCATIONAL NURSE TRAINING.	01- UNDERGRADUATE CERTIFICATE	PASS		0	0	35335	PASS	0	0	17680	PASS	N/A	N/A	N/A	N/A	N/A	35335	34081				
030432	BRIWOOD COLLEGE	LAS VEGAS	NV	891028618	PROPRIETARY 2 TO 3 YEARS	110103	INFORMATION TECHNOLOGY.	02- ASSOCIATES DEGREE	ZONE		A	10.26	2487	24233	ZONE	37.8	2487	6578	FAIL	8.86	2148	24233	ZONE	32.65	2148	5578	FAIL	24233	22946
030432	BRIWOOD COLLEGE	LAS VEGAS	NV	891028618	PROPRIETARY 2 TO 3 YEARS	430104	COMPUTER SUPPORT/SYSTEMS STUDIES.	02- ASSOCIATES DEGREE	ZONE		A	8.55	2042	23645	ZONE	33.78	2042	5900	FAIL	38.54	2309	23645	ZONE	38.54	2309	5900	FAIL	23333	23645
030432	BRIWOOD COLLEGE	LAS VEGAS	NV	891028618	PROPRIETARY 2 TO 3 YEARS	111006	COMPUTER SUPPORT SPECIALIST.	01- UNDERGRADUATE CERTIFICATE	PASS		6.11	1212	19803	PASS	56.24	1212	2155	FAIL	N/A	N/A	N/A	N/A	N/A	17964	19803				
030432	BRIWOOD COLLEGE	LAS VEGAS	NV	891028618	PROPRIETARY 2 TO 3 YEARS	130713	MEDICAL INSURANCE CODING SPECIALIST/CODER.	01- UNDERGRADUATE CERTIFICATE	PASS		4.88	1220	23181	PASS	16.84	1220	7526	PASS	N/A	N/A	N/A	N/A	N/A	23155	23181				
030432	BRIWOOD COLLEGE	LAS VEGAS	NV	891028618	PROPRIETARY 2 TO 3 YEARS	138055	MEDICAL CLINICAL ASSISTANT.	01- UNDERGRADUATE CERTIFICATE	PASS		6.21	1221	19603	PASS	61.72	1221	2879	FAIL	N/A	N/A	N/A	N/A	N/A	19603	19603				
030432	BRIWOOD COLLEGE	LAS VEGAS	NV	891028618	PROPRIETARY 2 TO 3 YEARS	138055	PHARMACY TECHNICIAN/ASSISTANT.	01- UNDERGRADUATE CERTIFICATE	PASS		5.61	1173	20879	PASS	36.38	1173	3224	FAIL	N/A	N/A	N/A	N/A	N/A	20879	19587				
030432	BRIWOOD COLLEGE	LAS VEGAS	NV	891028618	PROPRIETARY 2 TO 3 YEARS	131901	LICENSED PRACTICAL/VOCATIONAL NURSE TRAINING.	01- UNDERGRADUATE CERTIFICATE	PASS		5.44	2274	41800	PASS	9.41	2274	24145	PASS	N/A	N/A	N/A	N/A	N/A	39155	41800				
030439	NEWMCHOOL OF ARCHITECTURE AND DESIGN	SAN DIEGO	CA	921616609	PROPRIETARY 4 YEARS OR MORE	460201	ARCHITECTURE.	01- BACHELORS DEGREE	ZONE		14.98	5221	34846	FAIL	30.37	5221	17391	FAIL	10.14	9335	34846	ZONE	20.56	9335	17391	ZONE	34623	34846	
030449	NEWMCHOOL OF ARCHITECTURE AND DESIGN	SAN DIEGO	CA	921616609	PROPRIETARY 4 YEARS OR MORE	460201	ARCHITECTURE.	01- MASTERS DEGREE	ZONE		13.64	6429	47128	FAIL	21.81	6429	29473	ZONE	N/A	N/A	N/A	N/A	N/A	46366	47128				
030514	AUBURN CAREER CENTER	CONCORD	MA	044077971	PUBLIC LESS THAN 2 YEARS	531895	LICENSED PRACTICAL/VOCATIONAL NURSE TRAINING.	01- UNDERGRADUATE CERTIFICATE	PASS		0	0	31032	PASS	0	0	13377	PASS	N/A	N/A	N/A	N/A	N/A	31032	29297				
030515	US GRANT JOINT VOCATIONAL SCHOOL	BETHEL	ME	451066902	PUBLIC 2 TO 3 YEARS	150716	MEDICAL ADMINISTRATIVE/EXECUTIVE ASSISTANT AND MEDICAL SECRETARY																						

Institution ID (Unique ID)	Institution Name	City	State	Zip	Institution Type	CIP Code	CIP Name	Credential Level	Official Program Pass/Fail/Zone	Appeal Status	Debt-to- Earnings Ratio Annual Rate Numerator	Debt-to- Earnings Ratio Annual Rate Denominator	Debt-to- Earnings Ratio Annual Rate Numerator	Debt-to- Earnings Ratio Annual Rate Denominator	Debt-to- Earnings Ratio Annual Rate Numerator	Debt-to- Earnings Ratio Annual Rate Denominator	Debt-to- Earnings Ratio Annual Rate Numerator	Debt-to- Earnings Ratio Annual Rate Denominator	Debt-to- Earnings Ratio Annual Rate Numerator	Debt-to- Earnings Ratio Annual Rate Denominator	Debt-to- Earnings Ratio Annual Rate Numerator	Debt-to- Earnings Ratio Annual Rate Denominator	Debt-to- Earnings Ratio Annual Rate Numerator	Debt-to- Earnings Ratio Annual Rate Denominator	Debt-to- Earnings Ratio Annual Rate Numerator	Debt-to- Earnings Ratio Annual Rate Denominator	Debt-to- Earnings Ratio Annual Rate Numerator	Debt-to- Earnings Ratio Annual Rate 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Numerator	Debt-to- Earnings Ratio Annual Rate Denominator	Debt-to- Earnings Ratio Annual Rate Numerator	Debt-to- Earnings Ratio Annual Rate Denominator	Debt-to- Earnings Ratio Annual Rate Numerator	Debt-to- Earnings Ratio Annual Rate Denominator	Debt-to- Earnings Ratio Annual Rate Numerator	Debt-to- Earnings Ratio Annual Rate Denominator	Debt-to- Earnings Ratio Annual Rate Numerator	Debt-to- Earnings Ratio Annual Rate Denominator	Debt-to- Earnings Ratio Annual Rate Numerator	Debt-to- Earnings Ratio Annual Rate Denominator	Debt-to- Earnings Ratio Annual Rate Numerator	Debt-to- Earnings Ratio Annual Rate Denominator	Debt-to- Earnings Ratio Annual Rate Numerator	Debt-to- Earnings Ratio Annual Rate Denominator	Debt-to- Earnings Ratio Annual Rate Numerator	Debt-to- Earnings Ratio Annual Rate Denominator	Debt-to- Earnings Ratio Annual Rate Numerator	Debt-to- Earnings Ratio Annual Rate Denominator	Debt-to- Earnings Ratio Annual Rate Numerator	Debt-to- Earnings Ratio Annual Rate 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Institution Code (last four digits)	Institution Name	City	State	Zip	Institution Type	CIP Code	CIP Name	Credential Level	Official Program Pass/Fail/Zone	Appeal Status	Debt-to-Earnings Annual Rate	Debt-to-Earnings Annual Rate Numerator	Debt-to-Earnings Annual Rate Denominator	Debt-to-Earnings Annual Rate Pass/Fail/Zone	Debt-to-Earnings Discretionary Income Rate	Debt-to-Earnings Discretionary Income Rate Numerator	Debt-to-Earnings Discretionary Income Rate Denominator	Debt-to-Earnings Transitional Rate	Debt-to-Earnings Transitional Rate Numerator	Debt-to-Earnings Transitional Rate Denominator	Debt-to-Earnings Transitional Rate Pass/Fail/Zone	Mean Annual Earnings	Median Annual Earnings	
037005	D'MART INSTITUTE	BARRANQUITAS	PR	007943517	PROPRIETARY 2 TO 3 YEARS ELECTRICIAN.	460302	ELECTRICIAN.	01- UNDERGRADUATE CERTIFICATE	PASS		0.11	0	8104	PASS	100	0	0	FALL	N/A	N/A	N/A	N/A	8074	1225
037005	D'MART INSTITUTE	BARRANQUITAS	PR	007943517	PROPRIETARY 2 TO 3 YEARS PHARMACY TECHNICIAN/ASSISTANT.	510805	PHARMACY TECHNICIAN/ASSISTANT.	01- UNDERGRADUATE CERTIFICATE	PASS		0	0	8071	PASS	0	0	0	PASS	N/A	N/A	N/A	N/A	8071	855A
037005	D'MART INSTITUTE	BARRANQUITAS	PR	007943517	PROPRIETARY 2 TO 3 YEARS EMERGENCY MEDICAL TECHNOLOGY/TECHNICIAN [EMT PARAMEDIC]	510904	EMERGENCY MEDICAL TECHNOLOGY/TECHNICIAN [EMT PARAMEDIC]	01- UNDERGRADUATE CERTIFICATE	PASS		0	0	9097	PASS	0	0	0	PASS	N/A	N/A	N/A	N/A	9097	753B
037005	D'MART INSTITUTE	BARRANQUITAS	PR	007943517	PROPRIETARY 2 TO 3 YEARS NURSING ASSISTANT/ADMINISTRATIVE AND PATIENT CARE ASSISTANT/LEAD.	511902	NURSING ASSISTANT/ADMINISTRATIVE AND PATIENT CARE ASSISTANT/LEAD.	01- UNDERGRADUATE CERTIFICATE	PASS		0	0	9409	PASS	0	0	0	PASS	N/A	N/A	N/A	N/A	9409	0
037005	D'MART INSTITUTE	BARRANQUITAS	PR	007943517	PROPRIETARY 2 TO 3 YEARS ADMINISTRATIVE ASSISTANT AND SECRETARIAL SCIENCE, GENERAL.	520401	ADMINISTRATIVE ASSISTANT AND SECRETARIAL SCIENCE, GENERAL.	01- UNDERGRADUATE CERTIFICATE	PASS		0.62	38	6109	PASS	100	38	0	FALL	N/A	N/A	N/A	N/A	6109	38B
037016	COLLEGE OF BUSINESS & TECHNOLOGY	MIAMI	FL	331742407	PROPRIETARY 4 YEARS OR MORE HEALTH INFORMATION/MEDICAL RECORDS TECHNOLOGY/TECHNICIAN.	510707	HEALTH INFORMATION/MEDICAL RECORDS TECHNOLOGY/TECHNICIAN.	02- ASSOCIATES DEGREE	FAIL	A	24.91	3130	12564	FAIL	100	3130	0	FAIL	N/A	N/A	N/A	N/A	12564	12318
037016	COLLEGE OF BUSINESS & TECHNOLOGY	MIAMI	FL	331742407	PROPRIETARY 4 YEARS OR MORE BUSINESS ADMINISTRATION AND MANAGEMENT, GENERAL.	520201	BUSINESS ADMINISTRATION AND MANAGEMENT, GENERAL.	01- UNDERGRADUATE CERTIFICATE	FAIL	A	14.72	2628	17846	FAIL	999.99	2628	191	FAIL	19.8	3535	17846	FAIL	999.99	1633B
037016	COLLEGE OF BUSINESS & TECHNOLOGY	MIAMI	FL	331742407	PROPRIETARY 4 YEARS OR MORE TEACHING ENGLISH AS A SECOND OR FOREIGN LANGUAGE/ESL LANGUAGE INSTRUCTOR.	513401	TEACHING ENGLISH AS A SECOND OR FOREIGN LANGUAGE/ESL LANGUAGE INSTRUCTOR.	01- UNDERGRADUATE CERTIFICATE	PASS		0	0	11080	PASS	0	0	0	PASS	N/A	N/A	N/A	N/A	11080	594F
037016	COLLEGE OF BUSINESS & TECHNOLOGY	MIAMI	FL	331742407	PROPRIETARY 4 YEARS OR MORE HEATING, VENTILATION, AIR CONDITIONING AND REFRIGERATION ENGINEERING TECHNOLOGY/TECHNICIAN.	520501	HEATING, VENTILATION, AIR CONDITIONING AND REFRIGERATION ENGINEERING TECHNOLOGY/TECHNICIAN.	01- UNDERGRADUATE CERTIFICATE	PASS		4.26	828	19463	PASS	47.42	828	1746	FAIL	N/A	N/A	N/A	N/A	19463	11401
037016	COLLEGE OF BUSINESS & TECHNOLOGY	MIAMI	FL	331742407	PROPRIETARY 4 YEARS OR MORE HEATING, VENTILATION, AIR CONDITIONING AND REFRIGERATION ENGINEERING TECHNOLOGY/TECHNICIAN.	520501	HEATING, VENTILATION, AIR CONDITIONING AND REFRIGERATION ENGINEERING TECHNOLOGY/TECHNICIAN.	02- ASSOCIATES DEGREE	ZONE		9.43	2002	21222	ZONE	56.12	2002	3567	FAIL	13.75	2920	21222	FAIL	81.86	2920
037016	COLLEGE OF BUSINESS & TECHNOLOGY	MIAMI	FL	331742407	PROPRIETARY 4 YEARS OR MORE ELECTRICAL/ELECTRONICS MAINTENANCE AND REPAIR TECHNOLOGY, OTHER.	470199	ELECTRICAL/ELECTRONICS MAINTENANCE AND REPAIR TECHNOLOGY, OTHER.	01- UNDERGRADUATE CERTIFICATE	PASS		3.88	825	21237	PASS	23.03	825	3582	ZONE	N/A	N/A	N/A	N/A	N/A	20520
037016	COLLEGE OF BUSINESS & TECHNOLOGY	MIAMI	FL	331742407	PROPRIETARY 4 YEARS OR MORE ELECTRICAL/ELECTRONICS MAINTENANCE AND REPAIR TECHNOLOGY, OTHER.	470199	ELECTRICAL/ELECTRONICS MAINTENANCE AND REPAIR TECHNOLOGY, OTHER.	02- ASSOCIATES DEGREE	PASS		7.68	1570	20439	PASS	56.39	1570	2794	FAIL	N/A	N/A	N/A	N/A	N/A	20439
037016	COLLEGE OF BUSINESS & TECHNOLOGY	MIAMI	FL	331742407	PROPRIETARY 4 YEARS OR MORE GRAPHIC DESIGN.	500409	GRAPHIC DESIGN.	02- ASSOCIATES DEGREE	ZONE		9.41	2237	23762	ZONE	36.63	2237	6107	FAIL	14.51	3448	23762	FAIL	56.45	3448
037016	COLLEGE OF BUSINESS & TECHNOLOGY	MIAMI	FL	331742407	PROPRIETARY 4 YEARS OR MORE MEDICAL INSURANCE CODING SPECIALIST/CODER.	520713	MEDICAL INSURANCE CODING SPECIALIST/CODER.	01- UNDERGRADUATE CERTIFICATE	PASS		5.47	1028	18430	PASS	131.76	1028	783	FAIL	N/A	N/A	N/A	N/A	18430	1531B
037016	COLLEGE OF BUSINESS & TECHNOLOGY	MIAMI	FL	331742407	PROPRIETARY 4 YEARS OR MORE MEDICAL/LIAISON ASSISTANT.	510801	MEDICAL/LIAISON ASSISTANT.	01- UNDERGRADUATE CERTIFICATE	FAIL		14.78	1719	11607	FAIL	100	1719	0	FAIL	16.56	3526	11607	FAIL	100	1926
037016	COLLEGE OF BUSINESS & TECHNOLOGY	MIAMI	FL	331742407	PROPRIETARY 4 YEARS OR MORE BUSINESS ADMINISTRATION AND MANAGEMENT, GENERAL.	520201	BUSINESS ADMINISTRATION AND MANAGEMENT, GENERAL.	01- UNDERGRADUATE CERTIFICATE	PASS		6.12	904	14765	PASS	100	904	0	FAIL	N/A	N/A	N/A	N/A	N/A	14765
037018	ITT TECHNICAL INSTITUTE	SPOKANE VALLEY	WA	992161589	PROPRIETARY 4 YEARS OR MORE ANIMATION, INTERACTIVE TECHNOLOGY, VIDEO GRAPHICS AND SPECIAL EFFECTS.	500304	ANIMATION, INTERACTIVE TECHNOLOGY, VIDEO GRAPHICS AND SPECIAL EFFECTS.	01- BACHELORS DEGREE	FAIL		18.79	4695	24982	FAIL	64.07	4695	7327	FAIL	N/A	N/A	N/A	N/A	24659	24982
037018	ITT TECHNICAL INSTITUTE	SPOKANE VALLEY	WA	992161589	PROPRIETARY 4 YEARS OR MORE WEB PAGE, DIGITAL/MULTIMEDIA AND INFORMATION RESOURCES DESIGN.	510801	WEB PAGE, DIGITAL/MULTIMEDIA AND INFORMATION RESOURCES DESIGN.	02- ASSOCIATES DEGREE	FAIL		16.19	4455	27508	FAIL	45.21	4455	9833	FAIL	N/A	N/A	N/A	N/A	27508	25390
037018	ITT TECHNICAL INSTITUTE	SPOKANE VALLEY	WA	992161589	PROPRIETARY 4 YEARS OR MORE COMPUTER SYSTEMS NETWORKING AND TELECOMMUNICATIONS, COMPUTER AND INFORMATION SYSTEMS SECURITY/INFORMATION ASSURANCE.	513901	COMPUTER SYSTEMS NETWORKING AND TELECOMMUNICATIONS, COMPUTER AND INFORMATION SYSTEMS SECURITY/INFORMATION ASSURANCE.	02- ASSOCIATES DEGREE	ZONE		11.75	4289	36438	ZONE	22.86	4289	18673	ZONE	N/A	N/A	N/A	N/A	4289	18673
037018	ITT TECHNICAL INSTITUTE	SPOKANE VALLEY	WA	992161589	PROPRIETARY 4 YEARS OR MORE ELECTRICAL, ELECTRONIC AND COMMUNICATIONS ENGINEERING TECHNOLOGY/TECHNICIAN.	510503	ELECTRICAL, ELECTRONIC AND COMMUNICATIONS ENGINEERING TECHNOLOGY/TECHNICIAN.	01- BACHELORS DEGREE	PASS		10.04	4896	48763	ZONE	15.73	4896	31106	PASS	N/A	N/A	N/A	N/A	N/A	48763
037018	ITT TECHNICAL INSTITUTE	SPOKANE VALLEY	WA	992161589	PROPRIETARY 4 YEARS OR MORE ELECTRICAL, ELECTRONIC AND COMMUNICATIONS ENGINEERING TECHNOLOGY/TECHNICIAN.	510503	ELECTRICAL, ELECTRONIC AND COMMUNICATIONS ENGINEERING TECHNOLOGY/TECHNICIAN.	02- ASSOCIATES DEGREE	PASS		11.28	4888	43123	ZONE	19.04	4888	25568	PASS	N/A	N/A	N/A	N/A	N/A	43123
037018	ITT TECHNICAL INSTITUTE	SPOKANE VALLEY	WA	992161589	PROPRIETARY 4 YEARS OR MORE ELECTRICAL, ELECTRONIC AND COMMUNICATIONS ENGINEERING TECHNOLOGY/TECHNICIAN.	510503	ELECTRICAL, ELECTRONIC AND COMMUNICATIONS ENGINEERING TECHNOLOGY/TECHNICIAN.	01- BACHELORS DEGREE	PASS		6.49	3981	61329	PASS	9.12	3981	43634	FAIL	N/A	N/A	N/A	N/A	N/A	61329
037018	ITT TECHNICAL INSTITUTE	SPOKANE VALLEY	WA	992161589	PROPRIETARY 4 YEARS OR MORE CAD/CADD DRAFTING AND/OR DESIGN TECHNOLOGY/TECHNICIAN.	513102	CAD/CADD DRAFTING AND/OR DESIGN TECHNOLOGY/TECHNICIAN.	02- ASSOCIATES DEGREE	ZONE		11.68	4788	40993	ZONE	20.51	4788	23338	ZONE	N/A	N/A	N/A	N/A	40993	3979A
037018	ITT TECHNICAL INSTITUTE	SPOKANE VALLEY	WA	992161589	PROPRIETARY 4 YEARS OR MORE CRIMINAL JUSTICE/LAW ENFORCEMENT ADMINISTRATION.	520201	CRIMINAL JUSTICE/LAW ENFORCEMENT ADMINISTRATION.	02- ASSOCIATES DEGREE	FAIL		18.38	4456	25987	FAIL	69.8	4456	6352	FAIL	N/A	N/A	N/A	N/A	25987	22419
037018	ITT TECHNICAL INSTITUTE	SPOKANE VALLEY	WA	992161589	PROPRIETARY 4 YEARS OR MORE CRIMINAL JUSTICE/LAW ENFORCEMENT ADMINISTRATION.	520201	CRIMINAL JUSTICE/LAW ENFORCEMENT ADMINISTRATION.	01- BACHELORS DEGREE	FAIL		25.19	6096	26179	FAIL	77.38	6096	8524	FAIL	N/A	N/A	N/A	N/A	26261	26179
037018	ITT TECHNICAL INSTITUTE	SPOKANE VALLEY	WA	992161589	PROPRIETARY 4 YEARS OR MORE DESIGN AND VISUAL COMMUNICATIONS, GENERAL.	500401	DESIGN AND VISUAL COMMUNICATIONS, GENERAL.	02- ASSOCIATES DEGREE	FAIL		17.42	3708	21282	FAIL	102.23	3708	3687	FAIL	N/A	N/A	N/A	N/A	21282	20763
037018	ITT TECHNICAL INSTITUTE	SPOKANE VALLEY	WA	992161589	PROPRIETARY 4 YEARS OR MORE BUSINESS ADMINISTRATION AND MANAGEMENT, GENERAL.	520201	BUSINESS ADMINISTRATION AND MANAGEMENT, GENERAL.	01- BACHELORS DEGREE	PASS		10.61	4316	40864	ZONE	18.77	4316	22929	PASS	N/A	N/A	N/A	N/A	4316	37984
037022	CHANDLER - GILBERT COMMUNITY COLLEGE	CHANDLER	AZ	852252499	PUBLIC 2 TO 3 YEARS UNWORKER.	460303	UNWORKER.	01- UNDERGRADUATE CERTIFICATE	PASS		0.62	442	70624	PASS	0.83	442	52989	PASS	N/A	N/A	N/A	N/A	6747	79624
037022	CHANDLER - GILBERT COMMUNITY COLLEGE	CHANDLER	AZ	852252499	PUBLIC 2 TO 3 YEARS AIRCRAFT MECHANICS AND AIRCRAFT MAINTENANCE TECHNOLOGY/TECHNICIAN.	470607	AIRCRAFT MECHANICS AND AIRCRAFT MAINTENANCE TECHNOLOGY/TECHNICIAN.	01- UNDERGRADUATE CERTIFICATE	PASS		0.64	274	42644	PASS	1.1	274	24749	PASS	N/A	N/A	N/A	N/A	42644	42644
037022	CHANDLER - GILBERT COMMUNITY COLLEGE	CHANDLER	AZ	852252499	PUBLIC 2 TO 3 YEARS AIRCRAFT POWERPLANT TECHNOLOGY/TECHNICIAN.	470608	AIRCRAFT POWERPLANT TECHNOLOGY/TECHNICIAN.	01- UNDERGRADUATE CERTIFICATE	PASS		0.66	310	46788	PASS	1.06	310	29183	PASS	N/A	N/A	N/A	N/A	46788	46788
037026	DC CAREER INSTITUTE	MONACA	PA	150612307	PROPRIETARY LESS THAN 2 YEARS DATA ENTRY/MICROCOMPUTER APPLICATIONS, OTHER.	510659	DATA ENTRY/MICROCOMPUTER APPLICATIONS, OTHER.	01- UNDERGRADUATE CERTIFICATE	ZONE		9.17	1289	14053	ZONE	100	1289	0	FAIL	N/A	N/A	N/A	N/A	13026	14053
037026	DC CAREER INSTITUTE	MONACA	PA	150612307	PROPRIETARY LESS THAN 2 YEARS SYSTEMS NETWORKING AND LAN/WAN MANAGEMENT/MANAGER.	511002	SYSTEMS NETWORKING AND LAN/WAN MANAGEMENT/MANAGER.	01- UNDERGRADUATE CERTIFICATE	PASS		3.67	854	23266	PASS	15.22	854	5611	PASS	N/A	N/A	N/A	N/A	22061	23266
037026	DC CAREER INSTITUTE	MONACA	PA	150612307	PROPRIETARY LESS THAN 2 YEARS MEDICAL/CLINICAL ASSISTANT.	510801	MEDICAL/CLINICAL ASSISTANT.	01- UNDERGRADUATE CERTIFICATE	PASS		6.35	1203	18916	PASS	95.4	1203	1261	FAIL	N/A	N/A	N/A	N/A	16905	18916
037026	DC CAREER INSTITUTE	MONACA	PA	150612307	PROPRIETARY LESS THAN 2 YEARS MASSAGE THERAPY/THERAPEUTIC MASSAGE.	512501	MASSAGE THERAPY/THERAPEUTIC MASSAGE.	01- UNDERGRADUATE CERTIFICATE	PASS		5.57	966	17390	PASS	100	966	0	FAIL	N/A	N/A	N/A	N/A	17390	1487B
037027	WESTWOOD COLLEGE - LOS ANGELES	LOS ANGELES	CA	900010177	PROPRIETARY 4 YEARS OR MORE ANIMATION, INTERACTIVE TECHNOLOGY, VIDEO GRAPHICS AND SPECIAL EFFECTS.	500304	ANIMATION, INTERACTIVE TECHNOLOGY, VIDEO GRAPHICS AND SPECIAL EFFECTS.	01- BACHELORS DEGREE	FAIL		16.71	4093	28071	FAIL	45.05	4093	10456	FAIL	N/A	N/A	N/A	N/A	28071	28071
037027	WESTWOOD COLLEGE - LOS ANGELES	LOS ANGELES	CA	900010177	PROPRIETARY 4 YEARS OR MORE INFORMATION TECHNOLOGY.	510503	INFORMATION TECHNOLOGY.	01- BACHELORS DEGREE	PASS		9.99	3954	39578	ZONE	18.03	3954	21523	PASS	N/A	N/A	N/A	N/A	39578	35139
037027	WESTWOOD COLLEGE - LOS ANGELES	LOS ANGELES	CA	900010177	PROPRIETARY 4 YEARS OR MORE WEB PAGE, DIGITAL/MULTIMEDIA AND INFORMATION RESOURCES DESIGN.	510801	WEB PAGE, DIGITAL/MULTIMEDIA AND INFORMATION RESOURCES DESIGN.	01- BACHELORS DEGREE	FAIL		17.69	4441	25102	FAIL	59.63	4441	7447	FAIL	N/A	N/A	N/A	N/A	25102	22358
037027	WESTWOOD COLLEGE - LOS ANGELES	LOS ANGELES	CA	900010177	PROPRIETARY 4 YEARS OR MORE COMPUTER GRAPHICS.	510803	COMPUTER GRAPHICS.	01- BACHELORS DEGREE	FAIL		17.93	4097	23682	FAIL	57.39	4097	8027	FAIL	N/A	N/A	N/A	N/A	23682	24771
037027	WESTWOOD COLLEGE - LOS ANGELES	LOS ANGELES	CA	900010177	PROPRIETARY 4 YEARS OR MORE COMPUTER SOFTWARE AND MEDIA APPLICATIONS, OTHER.	513909	COMPUTER SOFTWARE AND MEDIA APPLICATIONS, OTHER.	01- BACHELORS DEGREE	PASS		8.03	4318	53707	ZONE	11.97	4318	36052	PASS	N/A	N/A	N/A	N/A	53707	40811
037027	WESTWOOD COLLEGE - LOS ANGELES	LOS ANGELES	CA	900010177	PROPRIETARY 4 YEARS OR MORE SYSTEMS NETWORKING AND LAN/WAN MANAGEMENT/MANAGER.	511002	SYSTEMS NETWORKING AND LAN/WAN MANAGEMENT/MANAGER.	01- BACHELORS DEGREE	PASS		9.05	4188	46276	ZONE	14.63	4188	28621	PASS	N/A	N/A	N/A	N/A	46276	40811
037027	WESTWOOD COLLEGE - LOS ANGELES	LOS ANGELES	CA	900010177	PROPRIETARY 4 YEARS OR MORE COMPUTER AND INFORMATION SYSTEMS SECURITY/INFORMATION ASSURANCE.	511003	COMPUTER AND INFORMATION SYSTEMS SECURITY/INFORMATION ASSURANCE.	01- BACHELORS DEGREE	PASS		7.8	4039	51732	PASS	11.85	4039	34077	PASS	N/A	N/A	N/A	N/A	51732	46699
037027	WESTWOOD COLLEGE - LOS ANGELES	LOS ANGELES	CA	900010177	PROPRIETARY 4 YEARS OR MORE LEGAL ASSISTANT/PARALEGAL.	520302	LEGAL ASSISTANT/PARALEGAL.	02- ASSOCIATES DEGREE	FAIL		13.9	3436	24719	FAIL	48.64	3436	7064	FAIL	N/A	N/A	N/A	N/A	24719	21482
037027	WESTWOOD COLLEGE - LOS ANGELES	LOS ANGELES	CA	900010177	PROPRIETARY 4 YEARS OR MORE CORRECTIONS AND CRIMINAL JUSTICE, OTHER.	520399	CORRECTIONS AND CRIMINAL JUSTICE, OTHER.	01- BACHELORS DEGREE	FAIL		12.53	3387	25420	FAIL	41.04	3387	7705	FAIL	N/A	N/A	N/A	N/A	25420	24675
037027	WESTWOOD COLLEGE - LOS ANGELES	LOS ANGELES	CA	900010177	PROPRIETARY 4 YEARS OR MORE DESIGN AND VISUAL COMMUNICATIONS, GENERAL.	500401	DESIGN AND VISUAL COMMUNICATIONS, GENERAL.	01- BACHELORS DEGREE	FAIL		15.88	4055	28531	FAIL	42.15	4055	10676	FAIL	N/A	N/A	N/A	N/A	28531	26259
037027	WESTWOOD COLLEGE - LOS ANGELES	LOS ANGELES	CA	900010177	PROPRIETARY 4 YEARS OR MORE INTERIOR DESIGN.	500408	INTERIOR DESIGN.	01- BACHELORS DEGREE	FAIL		17.81	4373	24542	FAIL	63.49	4373	6887	FAIL	N/A	N/A	N/A	N/A	24542	22805
037027	WESTWOOD COLLEGE - LOS ANGELES	LOS ANGELES	CA	900010177	PROPRIETARY 4 YEARS OR MORE GRAPHIC DESIGN.	500409	GRAPHIC DESIGN.	02- ASSOCIATES DEGREE	FAIL		16.22	3416	21055	FAIL	100.47	3416	3480	FAIL	N/A	N/A	N/A	N/A	21055	17578
037027	WESTWOOD COLLEGE - LOS ANGELES	LOS ANGELES	CA	900010177	PROPRIETARY 4 YEARS OR MORE HEALTH/HEALTH CARE ADMINISTRATION/MANAGEMENT.	511071	HEALTH/HEALTH CARE ADMINISTRATION/MANAGEMENT.	01- BACHELORS DEGREE	ZONE		11.13	3731	33516	ZONE	23.52	3731	15851	ZONE	N/A	N/A	N/A	N/A	33516	32670
037027	WESTWOOD COLLEGE - LOS ANGELES	LOS ANGELES	CA	900010177	PROPRIETARY 4 YEARS OR MORE BUSINESS ADMINISTRATION AND MANAGEMENT, GENERAL.	520201	BUSINESS ADMINISTRATION AND MANAGEMENT, GENERAL.	01- BACHELORS DEGREE	PASS		9.8	3588	36517	ZONE	18.97	3588	18882	PASS	N/A	N/A	N/A	N/A	36517	13682
037027	WESTWOOD COLLEGE - LOS ANGELES	LOS ANGELES	CA	900010177	PROPRIETARY 4 YEARS OR MORE BUSINESS ADMINISTRATION AND MANAGEMENT, GENERAL.	520201	BUSINESS ADMINISTRATION AND MANAGEMENT, GENERAL.	01- MASTERS DEGREE	PASS		1.31	656	49888	PASS	2.03	656	32283	PASS	N/A	N/A	N/A	N/A	49888	

Institution Code (FPEID)	Institution Name	City	State	Zip	Institution Type	CIP Code	CIP Name	Credential Level	Official Postsecondary Full/Part	Appeal Status	Debt-to-Earnings Annual Ratio Numerator	Debt-to-Earnings Annual Ratio Denominator	Debt-to-Earnings Annual Ratio Pass/Fail/Zone	Debt-to-Earnings Discretionary Income Rate	Debt-to-Earnings Discretionary Income Rate Numerator	Debt-to-Earnings Discretionary Income Rate Denominator	Debt-to-Earnings Discretionary Income Rate Pass/Fail/Zone	Debt-to-Earnings Transitional Income Rate Numerator	Debt-to-Earnings Transitional Income Rate Denominator	Debt-to-Earnings Transitional Income Rate Pass/Fail/Zone	Mean Annual Earnings	Median Annual Earnings						
030790	ETI TECHNICAL COLLEGE OF NILES	NILES	OH	44446438	PROPRIETARY 2 TO 3 YEARS	510801	MEDICAL/Clinical Assistant.	02 - ASSOCIATES DEGREE	FAIL	FAIL	17.97	2990	16333	FAIL	100	2990	0	FAIL	N/A	N/A	N/A	N/A	15670	16333				
030791	ETI TECHNICAL COLLEGE OF NILES	NILES	OH	44446438	PROPRIETARY 2 TO 3 YEARS	513001	LICENSED MEDICAL/VOCATIONAL NURSE TRAINING.	02 - UNDERGRADUATE CERTIFICATE	FAIL	PASS	5.36	1602	29833	PASS	13.15	1603	12178	PASS	N/A	N/A	N/A	N/A	29405	29833				
030791	NORTH CENTRAL INSTITUTE	CLARKSVILLE TN	TN	370431316	PROPRIETARY 2 TO 3 YEARS	476007	AIRFRAME MECHANICS AND AIRCRAFT MAINTENANCE TECHNOLOGY/TECHNICIAN.	01 - UNDERGRADUATE CERTIFICATE	PASS	0	0	31280	PASS	0	0	17635	PASS	N/A	N/A	N/A	N/A	N/A	35285	34036				
030798	GEORGE T BAKER AVIATION SCHOOL	MIAMI FL	FL	331423887	PUBLIC LESS THAN 2 YEARS	476007	AIRFRAME MECHANICS AND AIRCRAFT MAINTENANCE TECHNOLOGY/TECHNICIAN.	01 - UNDERGRADUATE CERTIFICATE	PASS	0	0	47895	PASS	0	0	30240	PASS	N/A	N/A	N/A	N/A	N/A	47895	47573				
030798	GEORGE T BAKER AVIATION SCHOOL	MIAMI FL	FL	331423887	PUBLIC LESS THAN 2 YEARS	476008	AIRCRAFT POWERPLANT TECHNOLOGY/TECHNICIAN.	01 - UNDERGRADUATE CERTIFICATE	PASS	0	0	41852	PASS	0	0	24197	PASS	N/A	N/A	N/A	N/A	N/A	47895	38758				
030800	NEWPORT SCHOOL OF HAIRDRESSING	PAWLETUCKET RI	RI	028604038	PROPRIETARY 2 TO 3 YEARS	120401	COSMETOLOGY/COSMETOLOGIST, GENERAL.	02 - UNDERGRADUATE CERTIFICATE	PASS	FAIL	5.88	631	10725	PASS	100	631	0	FAIL	N/A	N/A	N/A	N/A	10725	9982				
030816	DELAWARE CHENANGO MADISON OTSOD BOCCES	NOYHICWK NY	NY	131935054	PUBLIC LESS THAN 2 YEARS	513001	LICENSED PRACTICAL/VOCATIONAL NURSE TRAINING.	01 - UNDERGRADUATE CERTIFICATE	PASS	FAIL	4.04	1035	25374	PASS	13.06	1035	7919	PASS	N/A	N/A	N/A	N/A	23570	25374				
030819	VTI CAREER INSTITUTE - ALTONA	ALTONA PA	PA	160324487	PROPRIETARY 2 TO 3 YEARS	483039	CORRECTIONS AND CRIMINAL JUSTICE, OTHER.	02 - ASSOCIATES DEGREE	PASS	FAIL	7.55	1740	23045	PASS	32.45	1740	5381	FAIL	N/A	N/A	N/A	N/A	23045	22780				
030819	VTI CAREER INSTITUTE - ALTONA	ALTONA PA	PA	160324487	PROPRIETARY 2 TO 3 YEARS	510801	DENTAL ASSISTING/ASSISTANT.	01 - UNDERGRADUATE CERTIFICATE	PASS	FAIL	7.39	1286	17393	PASS	100	1286	0	FAIL	N/A	N/A	N/A	N/A	17393	17393				
030819	VTI CAREER INSTITUTE - ALTONA	ALTONA PA	PA	160324487	PROPRIETARY 2 TO 3 YEARS	510710	MEDICAL OFFICE ASSISTANT/SPECIALIST.	01 - UNDERGRADUATE CERTIFICATE	PASS	FAIL	7.5	1286	16399	PASS	100	1286	0	FAIL	N/A	N/A	N/A	N/A	14359	16399				
030819	VTI CAREER INSTITUTE - ALTONA	ALTONA PA	PA	160324487	PROPRIETARY 2 TO 3 YEARS	510801	MEDICAL/Clinical Assistant.	02 - ASSOCIATES DEGREE	ZONE	FAIL	9.4	1777	18885	ZONE	144.47	1777	1239	FAIL	10.42	1968	18885	ZONE	160	1968	1230	FAIL	16917	18885
030819	VTI CAREER INSTITUTE - ALTONA	ALTONA PA	PA	160324487	PROPRIETARY 2 TO 3 YEARS	510805	PHARMACY TECHNICIAN/ASSISTANT.	01 - UNDERGRADUATE CERTIFICATE	PASS	FAIL	5.49	1000	19304	PASS	64.28	1000	1649	FAIL	N/A	N/A	N/A	N/A	19304	19304				
030821	MYOTHRAPAC COLLEGE OF UTAH	SALT LAKE CITY UT	UT	841152522	PROPRIETARY LESS THAN 2 YEARS	513001	MASSAGE THERAPY/THERAPEUTIC MASSAGE.	01 - UNDERGRADUATE CERTIFICATE	PASS	FAIL	6.68	1057	15880	PASS	100	1057	0	FAIL	N/A	N/A	N/A	N/A	N/A	15880	11265			
030829	ROSEL SCHOOL OF COSMETOLOGY	CHICAGO IL	IL	606091913	PROPRIETARY LESS THAN 2 YEARS	120401	COSMETOLOGY/COSMETOLOGIST, GENERAL.	01 - UNDERGRADUATE CERTIFICATE	PASS	0	0	8451	PASS	0	0	0	PASS	N/A	N/A	N/A	N/A	N/A	8451	12885				
030830	CDK&S TECHNICAL COMMUNITY COLLEGE	SPRINGFIELD MO	MO	658023605	PUBLIC 2 TO 3 YEARS	513001	LICENSED PRACTICAL/VOCATIONAL NURSE TRAINING.	01 - UNDERGRADUATE CERTIFICATE	PASS	FAIL	2.7	780	28855	PASS	6.96	780	11200	PASS	N/A	N/A	N/A	N/A	28554	28855				
030837	GALEN HEALTH INSTITUTES	LOUISVILLE KY	KY	402071047	PROPRIETARY 4 YEARS OR MORE	513801	REGISTERED NURSING/REGISTERED NURSE.	02 - ASSOCIATES DEGREE	PASS	FAIL	6.2	3283	52398	PASS	9.3	3283	35283	PASS	N/A	N/A	N/A	N/A	52398	52398				
030837	GALEN HEALTH INSTITUTES	LOUISVILLE KY	KY	402071047	PROPRIETARY 4 YEARS OR MORE	513036	LICENSED PRACTICAL/VOCATIONAL NURSE TRAINING.	02 - ASSOCIATES DEGREE	PASS	FAIL	6.12	2036	33263	PASS	13.04	2036	15608	PASS	N/A	N/A	N/A	N/A	33263	33263				
030842	VALLEY COLLEGE	PRINCETON WV	WV	247403145	PROPRIETARY 2 TO 3 YEARS	120499	BUSINESS OPERATIONS SUPPORT AND SECRETARIAL SERVICES, OTHER.	01 - UNDERGRADUATE CERTIFICATE	ZONE	FAIL	11.58	1229	10611	ZONE	100	1229	0	FAIL	N/A	N/A	N/A	N/A	10611	12774				
030844	VALLEY COLLEGE	BECKLEY WV	WV	258012643	PROPRIETARY 2 TO 3 YEARS	120201	BUSINESS ADMINISTRATION AND MANAGEMENT, GENERAL.	02 - ASSOCIATES DEGREE	ZONE	FAIL	8.11	1659	20450	ZONE	59.35	1659	2795	FAIL	12.37	2530	20450	FAIL	90.51	2530	2795	FAIL	20450	18296
030844	VALLEY COLLEGE	BECKLEY WV	WV	258012643	PROPRIETARY 2 TO 3 YEARS	120499	BUSINESS OPERATIONS SUPPORT AND SECRETARIAL SERVICES, OTHER.	01 - UNDERGRADUATE CERTIFICATE	PASS	FAIL	7.93	883	11125	PASS	100	883	0	FAIL	N/A	N/A	N/A	N/A	11125	11046				
030847	VENTURA ADULT AND CONTINUING EDUCATION	VENTURA CA	CA	930037313	PUBLIC LESS THAN 2 YEARS	111001	NETWORK AND SYSTEM ADMINISTRATION/ADMINISTRATOR.	01 - UNDERGRADUATE CERTIFICATE	PASS	0	0	27130	PASS	0	0	9675	PASS	N/A	N/A	N/A	N/A	N/A	27130	24796				
030847	VENTURA ADULT AND CONTINUING EDUCATION	VENTURA CA	CA	930037313	PUBLIC LESS THAN 2 YEARS	510801	MEDICAL/Clinical Assistant.	02 - UNDERGRADUATE CERTIFICATE	PASS	0	0	3542	PASS	0	0	1649	PASS	N/A	N/A	N/A	N/A	N/A	20202	21197				
030847	VENTURA ADULT AND CONTINUING EDUCATION	VENTURA CA	CA	930037313	PUBLIC LESS THAN 2 YEARS	120201	ACCOUNTING.	01 - UNDERGRADUATE CERTIFICATE	PASS	0	0	30865	PASS	0	0	13210	PASS	N/A	N/A	N/A	N/A	N/A	28242	30865				
030857	PROFESSIONAL TECHNICAL INSTITUTION	BAYAMON PR	PR	009597061	PROPRIETARY LESS THAN 2 YEARS	150501	HEATING, VENTILATION, AIR CONDITIONING AND REFRIGERATION ENGINEERING TECHNOLOGY/TECHNICIAN.	01 - UNDERGRADUATE CERTIFICATE	PASS	0	0	12678	PASS	0	0	0	PASS	N/A	N/A	N/A	N/A	N/A	12678	10384				
030857	PROFESSIONAL TECHNICAL INSTITUTION	BAYAMON PR	PR	009597061	PROPRIETARY LESS THAN 2 YEARS	460302	ELECTRICIAN.	01 - UNDERGRADUATE CERTIFICATE	PASS	0	0	98	138	13961	PASS	100	138	0	FAIL	N/A	N/A	N/A	N/A	13961	13961			
030857	PROFESSIONAL TECHNICAL INSTITUTION	BAYAMON PR	PR	009597061	PROPRIETARY LESS THAN 2 YEARS	470304	COMPUTER INSTALLATION AND REPAIR TECHNOLOGY/TECHNICIAN.	01 - UNDERGRADUATE CERTIFICATE	PASS	FAIL	0.23	21	9105	PASS	100	21	0	FAIL	N/A	N/A	N/A	N/A	9105	1561				
030857	PROFESSIONAL TECHNICAL INSTITUTION	BAYAMON PR	PR	009597061	PROPRIETARY LESS THAN 2 YEARS	470310	SECURITY SYSTEM INSTALLATION, REPAIR, AND INSPECTION TECHNOLOGY/TECHNICIAN.	01 - UNDERGRADUATE CERTIFICATE	PASS	0	0	5	12089	PASS	100	7	0	FAIL	N/A	N/A	N/A	N/A	11958	12089				
030881	GEORGIA INSTITUTE OF COSMETOLOGY	ATHENS GA	GA	306061352	PROPRIETARY LESS THAN 2 YEARS	120401	COSMETOLOGY/COSMETOLOGIST, GENERAL.	01 - UNDERGRADUATE CERTIFICATE	FAIL	FAIL	16.42	1930	11627	FAIL	100	1930	0	FAIL	17.38	2021	11627	FAIL	2001	0	FAIL	11627	9897	
030891	GEORGIA INSTITUTE OF COSMETOLOGY	ATHENS GA	GA	306061352	PROPRIETARY LESS THAN 2 YEARS	120413	COSMETOLOGY/ BARBER/STYLING, AND NAIL INSTRUCTOR.	01 - UNDERGRADUATE CERTIFICATE	PASS	FAIL	6.08	1093	17962	PASS	556.02	1093	307	FAIL	N/A	N/A	N/A	N/A	N/A	17962	13938			
030892	NOUVELLE INSTITUTE	MIAMI FL	FL	331254145	PROPRIETARY 4 YEARS OR MORE	120401	COSMETOLOGY/COSMETOLOGIST, GENERAL.	01 - UNDERGRADUATE CERTIFICATE	PASS	0	0	10013	PASS	0	0	0	PASS	N/A	N/A	N/A	N/A	N/A	10013	9058				
030892	NOUVELLE INSTITUTE	MIAMI FL	FL	331254145	PROPRIETARY 4 YEARS OR MORE	120409	AESTHETICIAN/ESTHETICIAN AND SKIN CARE SPECIALIST.	01 - UNDERGRADUATE CERTIFICATE	PASS	0	0	8139	PASS	0	0	0	PASS	N/A	N/A	N/A	N/A	N/A	8139	7852				
030900	SHARPS ACADEMY OF HAIRSTYLING	DORLAND BLANC MO	LA	484391818	PROPRIETARY LESS THAN 2 YEARS	120401	COSMETOLOGY/COSMETOLOGIST, GENERAL.	01 - UNDERGRADUATE CERTIFICATE	ZONE	FAIL	3.82	414	10825	PASS	100	414	0	FAIL	N/A	N/A	N/A	N/A	10825	10513				
030906	COBB BEAUTY COLLEGE	KENNESAW GA	GA	301442828	PROPRIETARY LESS THAN 2 YEARS	120401	COSMETOLOGY/COSMETOLOGIST, GENERAL.	01 - UNDERGRADUATE CERTIFICATE	ZONE	FAIL	9.78	1303	13131	ZONE	100	1303	0	FAIL	12.96	1726	13131	FAIL	100	1726	0	FAIL	13131	9846
030908	LAKE ERIE COLLEGE OF OSTEOPATHIC MEDICINE	ERI PA	PA	165091025	PRIVATE, NOT FOR-PROFIT 4 YEARS OR MORE	511002	PRE-MEDICINE/PRE-MEDICAL STUDIES.	08 - GRADUATE CERTIFICATE	PASS	FAIL	3.49	1878	53726	PASS	5.2	1878	36071	PASS	N/A	N/A	N/A	N/A	53726	51519				
030927	SKYLINE COLLEGE	ROANOKE VA	VA	240121603	PROPRIETARY 2 TO 3 YEARS	513001	LICENSED MEDICAL/VOCATIONAL NURSE TRAINING.	02 - ASSOCIATES DEGREE	PASS	FAIL	11.82	1971	16672	ZONE	100	1971	0	FAIL	14.66	2445	16672	FAIL	2445	0	FAIL	16288	16072	
030927	SKYLINE COLLEGE	ROANOKE VA	VA	240121603	PROPRIETARY 2 TO 3 YEARS	513001	LICENSED PRACTICAL/VOCATIONAL NURSE TRAINING.	01 - UNDERGRADUATE CERTIFICATE	PASS	FAIL	8.06	2741	33968	ZONE	16.8	2741	16313	PASS	N/A	N/A	N/A	N/A	33968	33968				
030944	MARINELLO SCHOOL OF BEAUTY	SACRAMENTO CA	CA	958412009	PROPRIETARY LESS THAN 2 YEARS	120401	COSMETOLOGY/COSMETOLOGIST, GENERAL.	01 - UNDERGRADUATE CERTIFICATE	ZONE	FAIL	11.93	1385	11603	ZONE	100	1385	0	FAIL	13.37	1552	11603	FAIL	100	1552	0	FAIL	11603	10828
030948	INDUSTRIAL MANAGEMENT & TRAINING INSTITUTE	WATERBURY CT	CT	067061251	PROPRIETARY LESS THAN 2 YEARS	460302	ELECTRICIAN.	01 - UNDERGRADUATE CERTIFICATE	PASS	FAIL	2.34	975	41560	PASS	4.07	975	23906	PASS	N/A	N/A	N/A	N/A	41560	34088				
030948	INDUSTRIAL MANAGEMENT & TRAINING INSTITUTE	WATERBURY CT	CT	067061251	PROPRIETARY LESS THAN 2 YEARS	460303	PLUMBING TECHNOLOGY/PLUMBER.	01 - UNDERGRADUATE CERTIFICATE	PASS	FAIL	3.04	1015	13383	PASS	6.46	1015	15788	PASS	N/A	N/A	N/A	N/A	15788	13383				
030948	INDUSTRIAL MANAGEMENT & TRAINING INSTITUTE	WATERBURY CT	CT	067061251	PROPRIETARY LESS THAN 2 YEARS	470201	HEATING, AIR CONDITIONING, VENTILATION AND REFRIGERATION MAINTENANCE TECHNOLOGY/TECHNICIAN	01 - UNDERGRADUATE CERTIFICATE	PASS	FAIL	2.91	1006	37335	PASS	5.51	1096	15800	PASS	N/A	N/A	N/A	N/A	37335	33961				
030955	ASA COLLEGE	BROOKLYN NY	NY	112015208	PROPRIETARY 4 YEARS OR MORE	110101	COMPUTER AND INFORMATION SCIENCES, GENERAL.	02 - ASSOCIATES DEGREE	PASS	FAIL	6.73	1657	24592	PASS	23.88	1657	6917	ZONE	N/A	N/A	N/A	N/A	N/A	24592	21873			
030955	ASA COLLEGE	BROOKLYN NY	NY	112015208	PROPRIETARY 4 YEARS OR MORE	110901	COMPUTER SYSTEMS NETWORKING AND TELECOMMUNICATIONS.	02 - ASSOCIATES DEGREE	ZONE	FAIL	10.28	2276	22315	ZONE	50.84	2276	4475	FAIL	N/A	N/A	N/A	N/A	N/A	22315	19989			
030955	ASA COLLEGE	BROOKLYN NY	NY	112015208	PROPRIETARY 4 YEARS OR MORE	483034	CRIMINAL JUSTICE/SAFETY STUDIES.	02 - ASSOCIATES DEGREE	ZONE	FAIL	10.04	2045	20360	ZONE	75.6	2045	2705	FAIL	N/A	N/A	N/A	N/A	N/A	20360	17696			
030955	ASA COLLEGE	BROOKLYN NY	NY	112015208	PROPRIETARY 4 YEARS OR MORE	510701	HEALTH/HEALTH CARE ADMINISTRATION/AN MANAGEMENT.	02 - ASSOCIATES DEGREE	ZONE	FAIL	8.44	1767	20935	ZONE	53.87	1767	3280	FAIL	N/A	N/A	N/A	N/A	N/A	20935	19647			
030955	ASA COLLEGE	BROOKLYN NY	NY	112015208	PROPRIETARY 4 YEARS OR MORE	510706	HEALTH INFORMATION/MEDICAL RECORDS ADMINISTRATION/ADMINISTRATOR.	02 - ASSOCIATES DEGREE	ZONE	FAIL	11.11	2454	22075	ZONE	55.52	2454	4420	FAIL	N/A	N/A	N/A	N/A	N/A	22075	19935			
030955	ASA COLLEGE	BROOKLYN NY	NY	112015208	PROPRIETARY 4 YEARS OR MORE	510801	MEDICAL/Clinical Assistant.	02 - UNDERGRADUATE CERTIFICATE	PASS	FAIL	6.62	1112	16783	PASS	100	1112	0	FAIL	N/A	N/A	N/A	N/A	N/A	16783	14691			
030955	ASA COLLEGE	BROOKLYN NY	NY	112015208	PROPRIETARY 4 YEARS OR MORE	510801	MEDICAL/Clinical Assistant.	02 - ASSOCIATES DEGREE	ZONE	FAIL	11.69	2154	18415	ZONE	283.42	2154	780	FAIL	N/A	N/A	N/A	N/A	N/A	18415	17068			
030955	ASA COLLEGE	BROOKLYN NY	NY	112015208	PROPRIETARY 4 YEARS OR MORE	510805	PHARMACY TECHNICIAN/ASSISTANT.	02 - ASSOCIATES DEGREE	ZONE	FAIL	10.24	1881	18365	ZONE	264.92	1881	710	FAIL	N/A	N/A	N/A	N/A	N/A	18365	15148			
030955	ASA COLLEGE	BROOKLYN NY	NY	112015208	PROPRIETARY 4 YEARS OR MORE	120201	BUSINESS ADMINISTRATION AND MANAGEMENT, GENERAL.	02 - ASSOCIATES DEGREE	FAIL	FAIL	12.01	2494	20098	FAIL	102.16	2494	2933	FAIL	N/A	N/A	N/A	N/A	N/A	20098	18278			
030955	ASA COLLEGE	BROOKLYN NY	NY	112015208	PROPRIETARY 4 YEARS OR MORE	120305	ACCOUNTING AND BUSINESS/MANAGEMENT.	02 - ASSOCIATES DEGREE	ZONE	FAIL	10.38	2106	20275	ZONE	80.38	2106	2620	FAIL	N/A	N/A	N/A	N/A	N/A	20275	19137			
030956	OHIO TECHNICAL CENTER AT VANTAGE CAREER CENTER	VAN WERT OH	OH	458911178	PUBLIC LESS THAN 2 YEARS	430107	CRIMINAL JUSTICE/POLICE SCIENCE.	01 - UNDERGRADUATE CERTIFICATE	PASS	0	0	31378	PASS	0	0	13723	PASS	N/A	N/A	N/A	N/A	N/A	31378					

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Institution Code (as per DPE)	Institution Name	City	State	Zip	Difference Type	CIP Code	CIP Name	Credential Level	Official Program Pass/Fail/Zone	Appeal Status	Debt-to-Earnings Annual Ratio	Debt-to-Earnings Annual Rate Numerator	Debt-to-Earnings Annual Rate Denominator	Debt-to-Earnings Discretionary Income Rate Pass/Fail/Zone	Debt-to-Earnings Discretionary Income Rate Numerator	Debt-to-Earnings Discretionary Income Rate Denominator	Debt-to-Earnings Discretionary Income Rate Pass/Fail/Zone	Debt-to-Earnings Discretionary Income Rate Numerator	Debt-to-Earnings Discretionary Income Rate Denominator	Debt-to-Earnings Discretionary Income Rate Pass/Fail/Zone	Debt-to-Earnings Discretionary Income Rate Numerator	Debt-to-Earnings Discretionary Income Rate Denominator	Debt-to-Earnings Discretionary Income Rate Pass/Fail/Zone	Debt-to-Earnings Discretionary Income Rate Numerator	Debt-to-Earnings Discretionary Income Rate Denominator	Debt-to-Earnings Discretionary Income Rate 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EXHIBIT C

CHAD A. READLER
Acting Assistant Attorney General

ALEX G. TSE
Acting United States Attorney

MARCIA BERMAN
Assistant Branch Director

KAREN S. BLOOM
Senior Counsel
R. CHARLIE MERRITT
Trial Attorney
Civil Division, Federal Programs Branch
U.S. Department of Justice
P.O. Box 883
Washington, D.C. 20044
Telephone: (202) 514-4964
Facsimile: (202) 616-8460
E-mail: karen.s.bloom@usdoj.gov

Attorneys for Defendants

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

MARTIN CALVILLO MANRIQUEZ, *et al.*,

Plaintiffs,

v.

ELISABETH DEVOS, in her official capacity
as Secretary of Education, and the UNITED
STATES DEPARTMENT OF EDUCATION

Defendants.

No. 17-7210

**DECLARATION OF JULIAN SCHMOKE
IN SUPPORT OF DEFENDANTS'
OPPOSITION TO PLAINTIFFS' MOTION
FOR PRELIMINARY INJUNCTION**

1 I, Julian Schmoke, hereby declare under the penalty of perjury as follows:

2 1. I am over the age of 18 and competent to testify to the matters herein.

3 2. I am employed by the United States Department of Education ("Department") as Chief
4 Enforcement Officer at the Department's office of Federal Student Aid ("FSA"). I have been in
5 my current role since 2017.

6
7 3. I certify that I am duly authorized, am qualified, and have been given authority by the
8 Department to make the statements contained in this Declaration regarding the Department's
9 development of the relief methodology described in the December 15, 2017 memorandum and
10 the borrower defense claim review and determination process. The statements contained herein
11 are based on my personal knowledge as an employee of the Department, and my review of the
12 pertinent records.

13
14 4. As of April 1, 2018, over 147,000 borrower defense claims have been filed with the
15 Department since 2015. Over 99,000 of these claims are still pending.

16 5. The majority of the borrower defense claims filed with the Department have alleged
17 claims related to the Department's job placement rate findings for Heald College¹ and certain
18 Everest and WyoTech schools (the "CCI JPR claims").²

19
20 6. As of April 1, 2018, there are currently over 48,000 claims pending for students who
21 attended CCI.

22 7. As of April 1, 2018, over 9,000 borrower defense claims have been approved and
23 assigned relief since December 2017.
24

25
26
27 ¹ The Department's findings as to Heald College are available at
<https://studentaid.ed.gov/sa/sites/default/files/heald-findings.pdf>.

28 ² The Department's findings as to certain Everest or WyoTech schools are available at
<https://studentaid.ed.gov/sa/sites/default/files/ev-wy-findings.pdf>.

1 8. I was involved in discussions and decisions relating to the relief methodology after I
2 joined the Department as Chief Enforcement Officer.

3 9. The relief methodology set forth in the December 15, 2017 memorandum provides
4 Department employees reviewing CCI JPR claims and certain other CCI claims with a reasoned,
5 straightforward, and manageable way by which to determine relief for approved borrower
6 defense claims.

7
8 10. This process allows for the expeditious review and approval of such borrower defense
9 claims. For example, presently, for CCI JPR claims and certain other CCI claims, once a
10 borrower has been determined to have a defense to repayment under applicable State law based
11 upon the Department's findings, it averages less than an hour per claim to apply the relief
12 methodology and determine the amount of relief to be provided to an applicant.

13
14 11. The Borrower Defense Unit ("BDU") of the Enforcement Office within the office of
15 Federal Student Aid ("FSA") does not currently have a conceptual framework or principles that
16 would guide Department employees in making individualized determinations of relief for
17 borrower defense claims in a logical and consistent manner that would be fair to borrower
18 defense claimants.

19
20 12. The provision of individualized determinations of relief for CCI JPR claims and certain
21 other claims would be administratively burdensome for the Department, because it would require
22 the development of a general framework for relief determinations, the hiring and training of
23 personnel, and likely changes to the Department's systems and processes.

24
25 13. It is unknown how long the development such a framework or guiding principles would
26 take.

1 14. The BDU also does not presently have the personnel with the training or experience to
2 make individualized determinations of relief, which may involve analyses of individuals' tax or
3 income data and financial information as to other economic costs.

4 15. Given the volume of pending borrower defense claims, it is unknown how many such
5 personnel the Department would have to hire and train to allow for such determinations.
6

7 16. The BDU also does not presently collect information outside of what is requested on the
8 borrower defense application forms. To request and analyze such information would add an
9 unknown amount of time to the Department's processing of borrower defense claims.

10 17. Aside from the factors discussed above, there would also likely need to be other
11 adjustments and changes to the Department's systems and processes to accommodate the receipt
12 of information and approval of borrower defense claims. Such adjustments and changes would
13 also likely add more time to the Department's processing of borrower defense claims.
14

15 18. Given the volume of claims before the Department and the changes that would be
16 required as described above, it is likely that a change in the Department's relief determinations to
17 incorporate individual-specific information would not only necessitate a pause in the
18 Department's processing of CCI JPR claims and certain other CCI-related claims for an
19 unknown period of time, but would also significantly increase the amount of time required to
20 review and process such borrower defense claims.
21

22 19. The relief methodology employs decisions that were designed to compensate for the
23 understanding that the Department is not applying personalized relief based on the borrower's
24 precise earnings. It was reasoned during the development of the relief methodology that, in
25 contrast, an individualized approach would most likely lower the total amount of the payout to
26 borrowers, because such decisions and presumptions would not be applicable.
27
28

1 I declare under penalty of perjury, pursuant to the provisions of 28 U.S.C. § 1746, that the
2 foregoing is true and correct.

3 Executed on this 12th day of April, 2018.
4

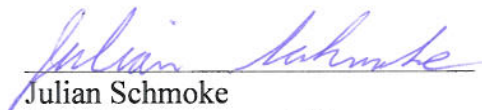
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6 Julian Schmoke
7 Chief Enforcement Officer
8 Office of Federal Student Aid
9 United States Department of Education
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EXHIBIT D

CHAD A. READLER
Acting Assistant Attorney General

ALEX G. TSE
Acting United States Attorney

MARCIA BERMAN
Assistant Branch Director

KAREN S. BLOOM
Senior Counsel
R. CHARLIE MERRITT
Trial Attorney
Civil Division, Federal Programs Branch
U.S. Department of Justice
P.O. Box 883
Washington, D.C. 20044
Telephone: (202) 514-4964
Facsimile: (202) 616-8460
E-mail: karen.s.bloom@usdoj.gov

Attorneys for Defendants

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

MARTIN CALVILLO MANRIQUEZ, *et al.*,

Plaintiffs,

v.

ELISABETH DEVOS, in her official capacity
as Secretary of Education, and the UNITED
STATES DEPARTMENT OF EDUCATION

Defendants.

No. 17-7210

**DECLARATION OF FRANK D. CURRAN
IN SUPPORT OF DEFENDANTS'
OPPOSITION TO PLAINTIFFS' MOTION
FOR PRELIMINARY INJUNCTION**

1 I, Frank D. Curran, hereby declare under the penalty of perjury as follows:

2 1. I am over the age of 18 and competent to testify to the matters herein.

3 2. I am employed by the United States Department of Education ("Department") as a Senior
4 Advisor at the Department's office of Federal Student Aid ("FSA"). I have been in my current
5 role since 2004. I have worked at the Department for over 13 years. Prior to being a Senior
6 Advisor, I was a manager at a federal student loan servicing vendor.

7
8 3. I certify that I am duly authorized, am qualified, and have been given authority by the
9 Department to make the statements contained in this Declaration regarding the Department's
10 business processes as to the receipt of borrower defense claim applications and the process of
11 notifying borrowers of borrower defense decisions once made, including the Department's
12 engagement of servicers to implement Federal student loan account changes in relation to the
13 borrower defense decisions. The statements contained herein are based on my personal
14 knowledge as an employee of the Department, and my review of the pertinent records.

15
16 4. Based upon my knowledge of the Department's operational processes and electronic
17 system for generating borrower defense notices, I estimate that it would cost approximately \$1.1
18 million to modify the Department's existing templates and document intake processes to
19 incorporate a request for, and receipt of, fields that would need to be individualized by applicant.
20 Specifically, this estimate refers to the situation where a decision on approval, but not federal
21 student loan discharge or refund of loan payment amounts, has been made, and further
22 information (such income information) is needed to effectuate the loan discharge or refund. In
23 this instance, there would need to be modifications of existing decision notifications sent to
24 borrowers to request additional information, such as income information, to allow the
25 Department to determine the proper discharge and/or refund amount. Such modifications would
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1 include, but are not limited to, modifying the borrower defense decision notice template to
2 incorporate requests for individual borrowers' income information.

3 5. The \$1.1 million cost estimate referenced in Paragraph 4, to incorporate a request for
4 additional information from borrowers within borrower defense notices, includes costs
5 associated with identifying the borrowers who would receive the requests for additional
6 information, modifying notices to include the request for additional information, receiving the
7 incoming information and determining if the information received provides the requested
8 information and storing the information for additional review. This estimate does not include
9 any estimate of the monetary cost to review the information received in relation to the claim
10 decision or determine the amount approved for discharge.
11

12
13 6. Similarly, I estimate it would take approximately two to four months to add the
14 additional steps referenced in Paragraph 5 to request more information. This time period
15 includes modifying processes to determine who should receive the requests, modifying current
16 notices to include the request for additional info, and putting processes in place to receive and
17 store the incoming information for others to review. This time estimate does not include any
18 estimate of the time that it may take a Department employee to review the information received
19 in relation to the claim decision or determine the amount approved for discharge.
20

21 7. Based upon my knowledge of the terms of the related servicing contracts the Department
22 has, in my estimation it would cost the Department approximately \$500,000 to make changes to
23 its processes to pause, or stop, issuing partial discharges and to modify any previously
24 discharged loan that was only partially discharged so that the borrower now receives a full
25 discharge. This amount includes creating instructions to be followed to apply the full amount
26 discharge in place of the partial discharge, identifying the population of impacted borrowers and
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1 the current servicer of the loans, notifying the borrower of the modification, and instructing the
2 servicer of the loan to apply the full discharge. This does not include any estimate of the cost
3 related to changes to review the claim in order to make a decision, to determine the amount
4 approved for discharge, or the amounts of the discharges.

5 8. Based upon my knowledge of the Department's operations for the processing of borrower
6 defense claims once decided, with the Department's current level of resources, I estimate it
7 would take approximately three to five months to pause, or stop, its processes for issuing partial
8 discharges and to modify any previously discharged loan that was only partially discharged so
9 that the borrower now receives a full discharge. This time period includes creating instructions
10 to be followed to apply the full amount discharge in place of the partial discharge, identifying the
11 population and the current servicer, notifying the borrower of the modification, instructing the
12 servicer of the loan to apply the full discharge, and application of the full discharges to the
13 borrower accounts, reporting of discharges, and initiating of refunds if appropriate.

14 9. It is unknown how many borrowers would respond to a request for additional
15 information. However, where we've requested borrowers to follow up by consolidating their
16 loans into Direct Consolidation Loans pursuant to pre-determinations that Federal Family and
17 Education Loan Program and Perkins Loan Program borrowers are eligible for full student loan
18 discharges on the basis of borrower defense, only 59% of such borrowers have taken the
19 additional steps required to obtain the loan discharges.


20 10. As of the date of this declaration, 8,809 borrower defense claimants have been approved
21 for partial discharges of their Federal student loans. Not all of these approved discharges have
22 completed processing, but for those that have been completed, the total amount of the partial
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1 discharges and associated loan payments that have been refunded to borrowers is approximately
2 \$13.4 million.

3 11. If relief in the form of full discharges of all related Federal student loans were to be
4 provided to claimants to who have been approved for partial loan discharges, the total amount of
5 the relief would be approximately \$70.3 million.
6

7
8
9 I declare under penalty of perjury, pursuant to the provisions of 28 U.S.C. § 1746, that the
10 foregoing is true and correct.

11
12 Executed on this 12th day of April, 2018.

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14 
15 Frank D. Curran
16 Senior Advisor
17 Office of Federal Student Aid
18 United States Department of Education
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