

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

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| ASSOCIATION OF PRIVATE SECTOR |) | |
| COLLEGES AND UNIVERSITIES, |) | |
| |) | Civil Action No. |
| Plaintiff, |) | 1:14-cv-01870 JDB |
| |) | |
| v. |) | |
| |) | |
| ARNE DUNCAN, in his official capacity as |) | |
| Secretary of the Department of Education, and |) | |
| U.S. DEPARTMENT OF EDUCATION, |) | |
| |) | |
| Defendants. |) | |

Department of Education
34 C.F.R. Parts 600, 668

Program Integrity: Gainful Employment; Final Rule
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Akers, Beth, and Chingos, Matthew M., *Is a Student Loan Crisis on the Horizon?* Brookings Institution, June 24, 2014..... AR-G-000004

American Student Assistance, *Managing Default*, 2014..... AR-G-000031

Apollo Group, Inc. *Form 10-K for the Fiscal Year Ending Aug. 31, 2013*, Oct. 22, 2013..... AR-G-000033

Avery, Christopher, and Turner, Sarah, *Student Loans: Do College Students Borrow Too Much—Or Not Enough?* Journal of Economic Perspectives, Vol. 26(1), 2012..... AR-G-000249

Baum, Sandy and O’Malley, Marie, *College on Credit: How Borrowers Perceive Their Education Debt, Results of the 2002 National Loan Survey*, Final Report, Nellie Mae, 2003..... AR-G-000278

Baum, Sandy and Schwartz, Saul, *How Much Debt is Too Much? Defining Benchmarks for Manageable Student Debt*, College Board, Apr. 20, 2006 AR-G-000292

Baum, Sandy, and McPherson, Michael, *Gainful Employment*, The Chronicle of Higher Education, Sept. 8, 2010 AR-G-000312

Baum, Sandy, and Payea, Kathleen, *Trends in Student Aid*, College Board, 2013 ... AR-G-000315

Baum, Sandy, Ma, Jennifer, and Payea, Kathleen, *Education Pays 2013: The Benefits of Education to Individuals and Society*, College Board, 2013 AR-G-000359

Belfield, Clive R., *Student Loans and Repayment Rates: The Role of For-Profit Colleges*, Research in Higher Education, Vol. 54(1), 2013..... AR-G-000407

Board of Trustees of the Federal Hospital Insurance and Federal Supplementary Medical Insurance Trust Funds, *2014 Annual Report*, July 28, 2014..... AR-G-000436

Bound, John, Lovenheim, Michael, and Turner, Sarah, *Understanding the Decrease in College Completion Rates and the Increased Time to the Baccalaureate Degree - Research Report No. 07-626*, Population Studies Center, Nov. 2007 AR-G-000719

- Bricker, Jesse, Kennickell, Arthur, Moore, Kevin, and Sabelhaus, John, *Changes in U.S. Family Finances from 2007 to 2010: Evidence from the Survey of Consumer Finances*, Federal Reserve Bulletin, Vol. 98(2), 2012 AR-G-000812
- Brown, Meta, and Caldwell, Sydnee, *Young Student Loan Borrowers Retreat from Housing and Auto Markets*, Liberty Street Economics, Apr. 17, 2013..... AR-G-000892
- Burd, Stephen, *More Selective For-Profits*, Inside Higher Ed, Nov. 11, 2011 AR-G-000900
- Cellini, Stephanie Riegg, and Chaudhary, Latika, *The Labor Market Returns to a For-Profit College Education*, The National Bureau of Economic Research, Working Paper, 2009 AR-G-000905
- Cellini, Stephanie Riegg, and Darolia, Rajeev, *College Costs and Financial Constraints: Student Borrowing at For-Profit Institutions*, W. E. Upjohn Institute for Employment Research, Unpublished Manuscript, Oct. 2013. AR-G-000945
- Cellini, Stephanie Riegg, *Crowded Colleges and College Crowd-Out: The Impact of Public Subsidies on the Two-Year College Market*, American Economic Journal: Economic Policy, Vol. 1(2), 2009..... AR-G-000988
- Cellini, Stephanie Riegg, *For-Profit Higher Education: An Assessment of Costs and Benefits*, National Tax Journal 65(1), Mar. 2012 AR-G-001019
- Cornell, Bradford and Cheng, Simon M., *An Analysis of Taxpayer Funding Provided for Post-Secondary Education: For-profit and Not-for-profit Institutions*, Charles River Associates, Sept. 8, 2010 AR-G-001047
- Darolia, Rajeev, *Student Loan Repayment and College Accountability*, Federal Reserve Bank of Philadelphia, Dec. 2013 AR-G-001072
- Deming, David, Goldin, Claudia, and Katz, Lawrence, , *The For-Profit Postsecondary School Sector: Nimble Critters or Agile Predators*, Journal of Economic Perspectives, Vol. 26(1), 2012..... AR-G-001099
- Deming, David, Goldin, Claudia, and Katz, Lawrence, *For Profit Colleges*, Future of Children, Vol. 23(1), 2013 AR-G-001126
- DeVry University, *Form 10-Q for the quarterly period ended Sept. 30, 2013*, Nov. 5, 2013..... AR-G-001153
- Dunlop, Eric, *What Do Stafford Loans Actually Buy You? The Effect of Stafford Loan Access on Community College Students*, National Center for Analysis of Longitudinal Data in Education Research, Working Paper, Feb. 2013 AR-G-001224
- Education Department Names Seasoned Team to Monitor Corinthian Colleges*, U.S. Department of Education, Press Release, July 18, 2014 AR-G-001287
- Egan, Matt, *Corinthian Colleges Crumbles 14% on SEC Probe*, Fox Business, June 11, 2013..... AR-G-001289
- Employers Who Report Wages with Significant Errors in the Employee Name and SSN (A-09-12-13036)*, U.S. Department of Health and Human Services, Office of the Inspector General, Aug. 2013 AR-G-001290
- Fain, Paul, *Kentucky Showdown*, Inside Higher Ed, Nov. 3, 2011 AR-G-001311

- Federal Reserve Bank of New York, *Quarterly Report on Household Debt and Credit*, Nov. 2012..... AR-G-001317
- Field, Kelly, *Attorneys General Take Aim at For-Profit Colleges' Institutional Loan Programs*, *The Chronicle of Higher Education*, Mar. 20, 2012 AR-G-001347
- For Profit Higher Education: The Failure to Safeguard the Federal Investment and Ensure Student Success*, Committee on Health, Education, Labor and Pensions (HELP), United States Senate, July 30, 2012..... AR-G-001353
- For-Profit Colleges: Undercover Testing Finds Colleges Encouraged Fraud and Engaged in Deceptive and Questionable Marketing Practices (GAO-10-948T)*, Government Accountability Office, Aug. 4, 2010 (reissued Nov. 30, 2010) AR-G-001357
- For-Profit: Large Schools and Schools that Specialize in Healthcare Are More Likely to Rely Heavily on Federal Student Aid (GAO-11-4)*, United States Government Accountability Office Report to Congressional Committees, Oct. 2010 AR-G-001568
- Gicheva, Dora, *Student Loans or Marriage? A Look at the Highly Educated*, University of North Carolina at Greensboro, Working Paper, 2014 AR-G-001629
- Gicheva, Dora, *In Debt and Alone? Examining the Causal Link between Student Loans and Marriage*, University of North Carolina at Greensboro, Working Paper, 2013..... AR-G-001655
- Gicheva, Dora, and Thompson, Jeffrey, *The Effects of Student Loans on Long-Term Household Financial Stability*, University of North Carolina at Greensboro, Working Paper, 2014 AR-G-001696
- Goldin, Claudia, and Cellini, Stephanie Riegg, *Does Federal Student Aid Raise Tuition? New Evidence on For-Profit Colleges*, *American Economic Journal: Economic Policy*, Forthcoming..... AR-G-001723
- Goldrick-Rab, Sara and Sorensen, Kia, *Unmarried Parents in College, Future of Children*, Journal Issue: Fragile Families, Vol. 20, Fall 2010 AR-G-001784
- Greiner, Keith, *How Much Student Loan Debt Is Too Much?* *Journal of Student Financial Aid*, Vol. 26(1), 1996..... AR-G-001791
- Gross, Jacob P. K., Cekic, Osman, , Hossler, Don, and Hillman, Nick, *What Matters in Student Loan Default: A Review of the Research Literature*, *Journal of Student Financial Aid*, Vol. 39(1), 2009 AR-G-001802
- Guryan, Jonathan, and Thompson, Mathew, *Report on the Proposed Gainful Employment Regulation*, Charles River Associates, 2014..... AR-G-001813
- Harrast, Steven A., *Undergraduate Borrowing: A Study of Debtor Students and their Ability to Retire Undergraduate Loans*, *Journal of Student Financial Aid (NASFAA)*, Vol. 34(1), 2004 AR-G-001927
- Hillman, Nicholas W., *College on Credit: A Multilevel Analysis of Student Loan Default*, *The Review of Higher Education*, Vol. 37(2), Project Muse, 2014..... AR-G-001945
- Ilg, Randy, and Theodossiou, Eleni, *Job Search of the Unemployed by Duration of Employment*, *Monthly Labor Review*, Mar. 2012 AR-G-001973

| | |
|--|-------------|
| Illinois Student Assistance Commission, <i>Increasing College Access . . . or Just Increasing Debt? A Discussion about Raising Student Loan Limits and the Impact on Illinois Students</i> , 2001..... | AR-G-001982 |
| Internal Revenue Service, <i>2014 General Instructions for Forms W-2 and W-3</i> , Dec. 17, 2013 | AR-G-002003 |
| Internal Revenue Service, <i>Household Employer’s Tax Guide (Publication 926)</i> , 2014..... | AR-G-002017 |
| Internal Revenue Service, <i>Reporting Tip Income – Restaurant Tax Tips</i> , Nov. 14, 2014 (last update)..... | AR-G-002034 |
| Internal Revenue Service, <i>Wage Compensation for S Corporation Officers (FS-2008-25)</i> , Aug. 2008..... | AR-G-002036 |
| Johnson, Mary, <i>Growth of the Social Security Earnings Suspense File Points to the Rising Potential Cost of Unauthorized Work to Social Security</i> , The Senior Citizens League, Feb. 2013..... | AR-G-002039 |
| Kane, Thomas J., and Rouse, Cecelia E., <i>Labor Market Returns to Two- and Four-Year College</i> , The American Economic Review, Vol. 85(3), 1995 | AR-G-002046 |
| Kantrowitz, Mark, <i>Student Aid Policy Analysis—Analysis of FY2011 Gainful Employment Data</i> , FinAid.org, July 13, 2012 | AR-G-002062 |
| Kantrowitz, Mark, <i>U.S. Department of Education Proposes Stricter Gainful Employment Rule</i> , Edvisors, Apr. 28, 2014 | AR-G-002082 |
| Kantrowitz, Mark, <i>What is Gainful Employment? What is Affordable Debt?</i> FinAid.org, Mar. 11, 2010..... | AR-G-002092 |
| Keller, Josh, <i>Facing new cuts, California’s colleges are shrinking their enrollments</i> , Chronicle of Higher Education, Jan. 13, 2011 | AR-G-002117 |
| King, Tracey, and Bannon, Ellynne, <i>The Burden of Borrowing: A report on rising rates of student loan debt</i> , Washington, DC: The State PIRG’s Higher Education Project, 2002 | AR-G-002122 |
| King, Tracey, and Frishberg, Ivan, <i>Big Loans, Bigger Problems: A Report on the Sticker Shock of Student Loans</i> , Washington, DC: The State PIRG’s Higher Education Project, 2001 | AR-G-002132 |
| Klor de Alva, Jorge, and Schneider, Mark, <i>Do Proprietary Institutions of Higher Education Generate Savings for States? The Case of California, New York, Ohio and Texas</i> , Nexus, Mar. 2014..... | AR-G-002167 |
| Klor de Alva, Jorge, <i>For-Profit Colleges and Universities: America’s Least Costly and Most Efficient System of Higher Education</i> , Nexus, Aug. 2010..... | AR-G-002191 |
| Lang, Kevin, and Weinstein, Russell, <i>The Wage Effects of Not-for-Profit and For-Profit Certifications: Better Data, Somewhat Different Results</i> , NBER, Working Paper, 2013 | AR-G-002265 |
| Lauerman, John, <i>For-Profit Colleges Face New Wave of State Investigations</i> , Bloomberg, Jan. 29, 2014..... | AR-G-002306 |

| | |
|--|-------------|
| Lewin, Tamar, <i>U.S. to Join Suit Against For-Profit College Chain</i> , The New York Times, May 2, 2011..... | AR-G-002311 |
| Lochner, Lance, and Monge-Naranjo, Alexandra, <i>Default and Repayment Among Baccalaureate Degree Earners</i> , NBER Working Paper, 2014..... | AR-G-002313 |
| Martin, Andrew, <i>Debt Collectors Cashing In on Student Loans</i> , The New York Times, Sept. 8, 2012..... | AR-G-002351 |
| Martin, Andrew, and Lehren, Andrew, <i>A Generation Hobbled by the Soaring Cost of College</i> , The New York Times, May 12, 2012 | AR-G-002357 |
| <i>Monitoring Aid Greater Than Federally Defined Need Could Help Address Student Loan Indebtedness (GAO-03-508)</i> , Government Accountability Office, Apr. 2003 | AR-G-002367 |
| Moretti, Enrico, <i>Estimating the Social Return to Higher Education: Evidence from Longitudinal and Repeated Cross-Sectional Data</i> , Journal of Econometrics, Vol. 121(1), 2004..... | AR-G-002404 |
| National Bureau of Economic Research, <i>US Business Cycle Expansions and Contractions</i> , 2014..... | AR-G-002442 |
| National Center for Education Statistics, <i>Fall Enrollment Survey (IPEDS-EF: 95-99) and IPEDS Spring 2001 through Spring 2013, Enrollment Component, Oct. 2013</i> | AR-G-003519 |
| National Center for Education Statistics, <i>2004-09 Beginning Postsecondary Students Longitudinal Study (BPS:04/09)</i> , Nov. 2011 | AR-G-002444 |
| National Center for Education Statistics, <i>2011-12 National Postsecondary Student Aid Study (NPSAS:12)</i> , Aug. 2013 | AR-G-002605 |
| National Center for Education Statistics, <i>Digest of Education Statistics (Table 222)</i> , 2012 | AR-G-002680 |
| National Center for Education Statistics, <i>Digest of Education Statistics (Table 306)</i> , 2012..... | AR-G-002682 |
| National Center for Education Statistics, <i>The Condition of Education 2010 (Table 416)</i> | AR-G-002684 |
| National Center for Education Statistics, <i>Degrees of Debt: 1993/94, 2000/01, and 2008/09 Baccalaureate and Beyond Longitudinal Studies (B&B:93/94, B&B:2000/01, and B&B:08/09)</i> , 2014..... | AR-G-002688 |
| National Center for Education Statistics, <i>Digest of Education Statistics (Table 318.40)</i> , 2013 | AR-G-002714 |
| National Center for Education Statistics, <i>Postsecondary Institutions and Cost of Attendance in 2012-13; Degrees and Other Awards Conferred, 2011-12; and 12-Month Enrollment, 2011-12 – First Look (Provisional Data)</i> , July 2013 | AR-G-002716 |
| National Center for Education Statistics, <i>Students Attending For-Profit Postsecondary Institutions: Demographics, Enrollment Characteristics, and 6-Year Outcomes 2012-173</i> , 2011 | AR-G-002732 |

| | |
|---|-------------|
| National Center for Education Statistics, <i>Unemployment Rates of Persons 16 to 64 Years Old, By Age Group and Educational Attainment: Selected years, 1975 through 2013</i> | AR-G-002760 |
| National Conference of State Legislatures, <i>Child Support 101.2: Establishing and Modifying Support Orders</i> | AR-G-002762 |
| National Conference of State Legislatures, <i>Child Support Digest</i> , Vol. 1(3), Nov. 24, 2014..... | AR-G-002770 |
| Nelson, Libby A., <i>\$2.5M Settlement over ‘GIBill.com’</i> , Inside Higher Ed, June 28, 2012. | AR-G-002775 |
| Office of Management and Budget, <i>Circular A-4: Regulatory Analysis</i> , Sept. 17, 2013 | AR-G-002777 |
| Olsen, Anya, and Hudson, Russell, <i>Social Security Administration's Master Earnings File: Background Information</i> , U.S. Social Security Administration, Office of Retirement and Disability Policy, <i>Social Security Bulletin</i> , Vol. 69(3), 2009..... | AR-G-002825 |
| <i>Private Student Loans</i> , FinAid.org | AR-G-002842 |
| Scherschel, Patricia, <i>Student Indebtedness: Are Borrowers Pushing the Limits?</i> USA Group Foundation, 1998 | AR-G-002857 |
| Schneider, Mark, <i>Are Graduates from Public Universities Gainfully Employed? Analyzing Student Loan Debt and Gainful Employment</i> , American Enterprise Institute, 2014 | AR-G-002907 |
| Shakely, Jack, <i>Dollar Signs in Uniform</i> , Los Angeles Times, Nov. 12, 2012..... | AR-G-002917 |
| Shand, Jennifer M., <i>The Impact of Early-Life Debt on the Homeownership Rates of Young Households: An Empirical Investigation</i> , Federal Deposit Insurance Corporation Center for Financial Research, 2007 | AR-G-002919 |
| Shapiro, Robert J., and Pham, Nam D., <i>Taxpayers’ Costs to Support Higher Education: A Comparison of Public, Private Not-for-Profit, and Private For-Profit Institutions</i> , Sonoco, 2010..... | AR-G-002946 |
| Simone, Sean Anthony, <i>Transferability of Postsecondary Credit Following Student Transfer or Coenrollment: Statistical Analysis Report (NCES 2014-163)</i> (Table 8), National Center for Education Statistics, Aug. 2014 | AR-G-003013 |
| Social Security Administration, <i>Annual Benefits Paid from the OASI Trust Fund, by type of benefit, calendar years 1937-2013</i> | AR-G-003155 |
| Social Security Administration, <i>Introduction to Section 218: State and Local Coverage</i> , 2008..... | AR-G-003160 |
| <i>State Policies Used to Establish Child Support Orders for Low-income Non-custodial Parents</i> , U.S. Department of Health and Human Services, Office of the Inspector General, 2000..... | AR-G-003185 |
| <i>Student Outcomes Vary at For-Profit, Nonprofit, and Public Schools (GAO-12-143)</i> , Government Accountability Office, Dec. 7, 2011 | AR-G-003215 |

U.S. Department of Education, *Comparison of FY 2011 Official National Cohort Default Rates to Prior Two Official Cohort Default Rates*, July 26, 2014 AR-G-003312

U.S. Department of Education, Federal Student Aid, *Default Rates for Cohort Years 2007-2011*, June 6, 2014 AR-G-003313

U.S. Department of Education, *FY 2002 Performance and Accountability Report (PAR), FY 2002 Performance and Accountability Report (PAR)*, Jan. 31, 2003 AR-G-003316

U.S. Department of Education, *FY 2011 2-Year National Student Loan Default Rates*..... AR-G-003487

U.S. Department of Education, Press Release: *Default Rates Continue to Rise for Federal Student Loans*, Sept. 30, 2013..... AR-G-003489

U.S. Department of Health and Human Services, Office of the Assistant Secretary for Planning and Evaluation, *2011 Poverty Guidelines*..... AR-G-003491

U.S. Department of Health and Human Services, Office of the Assistant Secretary for Planning and Evaluation, *Frequently Asked Questions Related to the Poverty Guidelines and Poverty* AR-G-003493

U.S. Department of Labor, Bureau of Labor Statistics, *Employment Projections (Table)*, Mar. 24, 2014..... AR-G-003499

U.S. Department of Labor, Bureau of Labor Statistics, *Frequently Asked Questions - Labor Force Statistics from the Current Population Survey*, Apr. 18, 2011..... AR-G-003500

U.S. Department of Labor, Bureau of Labor Statistics, *Labor Force Statistics from the Current Population Survey – Databases, Tables & Calculators by Subject*, 2014..... AR-G-003504

U.S. Department of Labor, Wage and Hour Division, *Minimum Wage* AR-G-003506

Vornovytsky, Marina, Gottschalck, Alfred, and Smith, Adam, *Household Debt in the U.S.: 2000 to 2011*, U.S. Census Bureau, Survey of Income and Program Participation Panel AR-G-003509

We Can't Wait: President Obama Takes Action to Stop Deceptive and Misleading Practices by Educational Institutions that Target Veterans, Service Members and their Families, White House, Press Release, Apr. 26, 2012 AR-G-003517

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