

January 26, 2015

The Honorable Arne Duncan
Secretary
U.S. Department of Education
400 Maryland Avenue, SW
LBJ Education Building, 7W311
Washington, DC 20202

Dear Secretary Duncan,

I want to thank you for your leadership and taking the time to meet directly with Greg Cappelli and me on December 3, 2014. We both enjoyed the discussion and were happy to share some of the initiatives Apollo Education Group is focused on to serve working adult students and address the growing skills gap.

Immediately following our meeting, I spoke with Under Secretary Mitchell about the vital need to have accurate, up-to-date data on the impact of final gainful employment regulations. On October 30, 2014, the day before the final rules were published, we received a call from former Deputy Secretary Jim Shelton regarding the imminent publication of the final rule at which time Mr. Shelton committed to provide updated data within 30 days of the final rule being published on October 31, 2014.

The last data set released by the Department of Education was on March 25, 2014. The data released corresponds to cohorts of students who completed programs between October 1, 2007 and September 30, 2009. The earnings data corresponds to the calendar year 2011. Furthermore, the cohort of students used did not correspond to the NPRM, nor the final rule. We have stated publicly, that Apollo Education Group will take the steps necessary to ensure each of our programs prepare student for gainful employment in a recognized occupation based on final regulations. In order to accomplish this, we are in need of data for which we don't have access. For example, the wage data used in the debt-to-earnings calculations must be pulled and aggregated from the Social Security Administration.

I am writing to respectfully seek your help in determining when institutions will receive updated data that corresponds to the final rule that goes into effect on July 1, 2015.

It is vital that Apollo Education Group receive this data to properly assess the impact of the final regulations and take the steps, if necessary, to ensure our programs at University of Phoenix and Western International successfully prepare students for gainful employment per the new requirements.

Again, thank you for your leadership and commitment to college access and affordability.

Sincerely,



Mark Brenner
Chief of Staff
Apollo Education Group

cc: Deputy Secretary Ted Mitchell

