



November 13, 2013

Ms. Jessica Rich
Director of the FTC's Bureau of Consumer Protection
Federal Trade Commission
600 Pennsylvania Avenue, NW
Washington, DC 20580

Dear Ms. Rich:

On behalf of the thousands of private sector colleges and the millions of students who attend our institutions, including hundreds of thousands of military servicemembers, veterans and their families, I am writing in hopes of starting a dialogue between your agency and our institutions.

Recently, the Federal Trade Commission (FTC) posted a tip sheet entitled Choosing A College, "8 Questions to Ask." The eight questions listed are the exact questions all students should be asking when picking a college and I applaud your efforts to share this information with veteran and military students. However, it is unfortunate that you used an opportunity to share sound advice to also attack all private sector colleges and universities by accusing institutions of being more interested in the bottom line than our students.

Private sector colleges and universities are proud, and honored, to provide veterans, servicemembers, and their families with access to career-focused postsecondary education programs that help maintain the readiness of our military, as well as prepare them for a career after the military. Our institutions work hard to provide a range of services and supports to ensure that each student has a quality educational experience. Many of our members are proud to be leaders in offering flexible degree programs, credit for military experience and training, and reduced tuition rates for servicemembers and veterans.

This year, as part of our proactive effort to help prepare our institutions for the million servicemembers leaving the military in the next five years, APSCU released a guide, Best Practices for Military and Veteran Students, addressing most – if not all – of the concerns cited in your post. The Best Practices provide recommendations and suggestions to institutions of higher education for improving the educational experience of America's military and veteran students. The recommendations address: consumer information, enrollment and recruitment; institutional commitment to provide military and veteran student support; promising practices for ensuring military and veteran student success through student services; and establishing institutional research guidelines for tracking military and veteran student success.

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I would like to share with you a few findings from a 2010 study by the Rand Corporation and ACE titled, "Military Veterans' Experiences Using the Post 9/11 GI Bill and Pursuing Postsecondary Education." The study reported the following findings:

- 60 percent of survey respondents were satisfied with the experience of transferring military credits to a private sector college or university. Only 27 percent from community colleges and 40 percent from four-year public colleges were satisfied.
- Our institutions' respondents reported fewer challenges to accessing required courses than all other institution types except for four-year public colleges.
- Our institutions' respondents reported higher than average satisfaction rates with academic advising, at 67 percent versus about 50 percent satisfaction, among respondents at other institution types.
- Reasons for choosing to attend a private sector college or university included: career oriented programs with flexible schedules, like-minded adult students, flexible credit transfer rules, and same institution in multiple locations.

While I appreciate the FTC's intent to support student veterans in making informed educational choices, the FTC post incorrectly suggests that our institutions are not supporting veteran and military students. That is simply not true and I would ask that you delete the inappropriate comments about our institutions.

Sincerely,



Steve Gunderson
President and CEO

Attachment



FEDERAL TRADE COMMISSION
CONSUMER INFORMATION

Choosing A College

8 Questions to Ask

Ready

to transition from servicemember to civilian? You may be looking into an education program to help launch the next chapter in your career. As you evaluate your options, be aware that some for-profit schools may not have your best interest in mind. They may want to use your post-9/11 GI Bill benefits to boost their bottom line and may not help you achieve your education goals. They may stretch the truth to persuade you to enroll, either by pressuring you to sign up for courses that don't suit your needs or to take out loans that will be a challenge to pay off.

How can you tell whether a school is a for-profit or a non-profit institution? Go to the Department of Education's (ED) [College Navigator](#) and search the school's name to get this information and other important details about accreditation and default rates.

The

Federal Trade Commission says getting the answers to eight key questions can help you avoid pitfalls as you pick the college that's right for you.

- 1. What's the total cost? How will I pay for tuition or expenses that my VA benefits don't cover?** Find out if you will pay by course, semester, or program. Are there fees for dropping or adding a class? How much will you pay for books, equipment, uniforms, lab fees, or graduation fees? In addition to your post-9/11 GI Bill benefits, you may be eligible for federal financial student aid that may offer more favorable terms than a private loan. ED administers several major student aid programs in the forms of grants, loans, and work-study programs. Get details at studentaid.gov. Consider other options, too, including community colleges.
- 2. Of the recent graduates who borrowed money to attend the school, what percentage are delinquent in paying back their loans?** A high default rate could be a tip-off that students are burdened by too much debt or having trouble finding jobs in their field. Get information about student borrowers' default rates at [College Navigator](#) (for the colleges you're considering) and ED's [Federal Student Aid site](#) (default rate by type of school – public, private non-profit or private for-profit.)
- 3. Will a degree from this school get me where I want to go?** Will you earn a certificate, a two-year degree, or a four-year degree? What percentage of students graduate? Use ED's [College Navigator](#) to compare graduation and loan default rates, average debt at the school, tuition and expenses, and accreditation among schools. Ask the schools you're considering to give you information in writing about job placement and average salaries for their graduates in the program you want to study. They may paint a glowing picture of student success and try to convince you that credentials from their institution will lead to a high-paying career in your chosen field. But some schools manipulate the data or lie about how well their graduates fare. Do some research using the U.S. Department of Labor's [Occupational Outlook Handbook](#). It has information about the average salary workers in a particular field are earning, the education or training needed, and the careers with the most new jobs so you can evaluate whether the results the school claims are realistic.
- 4. Is there pressure to enroll?** Is a recruiter rushing you to commit? Are they leaning on you to decide before you have a chance to research the program and confirm the details of financial aid? Recruiters

may be paid based on how many students they bring in. Before you decide on a program, read the materials, including the contract. Can you cancel within a few days of signing up and, if so, do the materials tell you how to cancel? If the school refuses to give you documents to review before you commit, don't enroll. Period.

5. **Can I get credit for my military training?** The American Council on Education has a guide to help schools grant all possible credit for military training. Ask the school you're considering if they follow the [ACE Military Guide](#) and whether they will grant you credit for your military training. Some schools offer credit for military coursework, but not for occupational specialties.
6. **Can I transfer credit I earn at this school to other schools?** If a transfer to another college may be in your future, find out whether that school would accept the credits you earned at the first school. If you attend a community college, ask about their articulation agreement: that's a formal statement of what community college courses and credits you can transfer to a particular four-year college.
7. **Is the school accredited?** Accreditation usually is through a private education agency or association that evaluates the program and verifies that it meets certain requirements. Accreditation can be an important clue to a school's ability to provide appropriate levels of training and education – but only if the accrediting body is reputable. Most institutions consider regional accreditation as the highest stamp of approval and may not accept the transfer of credits from a school with national accreditation. Accreditation also may affect how prospective employers view your credentials. Two reliable sources of information on accreditation are ED's [Database of Accredited Postsecondary Institutions and Programs](#) and the [Council for Higher Accreditation database](#).
8. **Is the school committed to helping veterans?** Many schools claim to be military- or veteran-friendly. How do they back that up? Is there access to academic and career support? Mental health, disability and medical services? What are the housing options for veterans? Is there help navigating the university? [Student Veterans of America](#) has chapters on nearly 300 campuses; their [Connect Alumni program](#) can put you in touch with veterans from the school you're considering. What's more, some 3,600 institutions have agreed to follow the [Department of Veterans Affairs \(VA\) Principles of Excellence](#) program, which includes designating a veteran's point of contact for academic and financial counseling, and stopping misrepresentations or aggressive recruiting at their school. Bear in mind that some organizations use names, seals, and logos that look or sound like those of respected, legitimate military or educational institutions. Using the words "veteran" or "military-approved" doesn't necessarily mean the schools are benefitting veterans or servicemembers.

If a school hasn't lived up to its promises, report it:

Federal Trade Commission

www.ftc.gov/complaint

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