

From: Antal Desai [adesai@cpmg-inc.com]
Sent: Wednesday, October 28, 2009 5:03 PM
To: Manheimer, Ann; Bergeron, David
Cc: Kerrigan, Brian; Gargano, Anthony; Kent McGaughy; Lee
Godown
Subject: Thank You

Dear David and Ann:

Thank you for making time to meet with us last Wednesday and also including Tony and Brian in our discussion. As with our first meeting a couple months ago, we are encouraged by your deep understanding of the issues at hand and your commitment to reform.

Per our discussion, following the GAO report, it is now widely accepted that for-profit schools are committing fraud. Contrary to the for-profit industry's hollow assertion that fraud in for-profit education is isolated, our research shows that fraud in for-profit education is both pervasive and structural.

With the above point of view in mind, we found the Apollo Group's disclosure yesterday that the SEC is investigating its revenue recognition policies to be noteworthy. As you know, the for-profit business model is laser-focused on recruiting as many warm, Title IV eligible bodies as quickly as possible. Recruiting machines are also under tremendous pressure to maximize Title IV funding per student and sadly, per drop-out. Consequently, we have long believed that the industry manipulates return-to-lender rules by administratively slow-playing drop-outs in order to maximize Title IV funds earned on a per drop-out basis. This triple fraud is being committed against the Department, taxpayers and unknowing students who are burdened with additional debt.

This problem is not specific to Apollo, and we see it more as a "cash issue" than a "revenue recognition" issue. During her testimony to the House Committee on Education and Labor a few weeks ago, acting Inspector General (IG) Mary Mitchelson expressed concern that attendance verification in distance education and consequently return to lender funding is an area rife with potential fraud. At present, attendance verification is not required under Title IV. In its 2008 audit of Capella University (one of the largest for-profit education companies), the IG found that Capella did not have adequate controls in place to determine whether students actually began class or not. In other words, because Capella does not systematically take attendance, Capella does not know when students stop attending class. Therefore, Capella has ample room to manipulate student attendance in order maximize retention of student financial aid. Perversely, the more inefficient a school is at processing drop-outs, the more profitable its drop-outs are. To put the drop-out slow play scheme into perspective, our analysis of the scheme at Apollo alone suggests that Apollo may be failing to return up to \$400 million annually in drop-out related funds.

Like incentive compensation, ATB testing, diploma mills, etc., the drop-out slow play scheme is rooted in the for-profit education industry's fundamental flaw: the companies are direct sales focused Title IV vacuum cleaners and therefore, differ greatly in their mission from traditional educational institutions. We believe that attendance verification and return-to-lender rules would be valuable discussion topics at the upcoming negotiated rulemaking sessions. Please let us know if you would like for us to discuss our perspective or share our analysis with you.

Again, thank you for your time last week and we look forward to staying in touch. If we can help you in any way, please do not hesitate to contact us.

Sincerely,

From: Antal Desai [adesai@cpmg-inc.com]
Sent: Tuesday, December 08, 2009 9:36 AM
To: kathryn_young@murray.senate.gov
Cc: Bergeron, David; Manheimer, Ann; Kent McGaughy;
wdunn@pstrategies.com
Subject: Negotiated Rulemaking

Dear Kathryn:

We hope you are well. We know you are hard at work on many important issues facing the country, including education, and we are writing to remind you of the pressing need to improve program integrity in postsecondary education.

Last week, the Department of Education (Department) released draft regulations aimed at strengthening program integrity in Title IV aid programs for post-secondary education. The Department developed these regulations after considerable research and consultation with key stakeholders, including members of both non-profit and for-profit sectors as well as other important affected parties.

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educational goals if a large and rapidly growing percentage of Title IV funds continues to be siphoned off and wasted by recruiting machines that do not educate.

Secretaries Duncan and Shireman and Department staffers are seriously committed to improving educational access, while eliminating waste, fraud and abuse in Title IV. The draft regulations are an important first step. Please actively support the Department in its effort.

Best Regards,

Kent McGaughy

Antal Desai

From: Antal Desai [adesai@cpmg-inc.com]
Sent: Tuesday, December 08, 2009 9:34 AM
To: jessica.gross@mail.house.gov
Cc: Bergeron, David; Manheimer, Ann; Kent McGaughy;
wdunn@pstrategies.com
Subject: Negotiated Rulemaking

Dear Jessica:

We hope you are well. We know you are hard at work on many important issues facing the country, including education, and we are writing to remind you of the pressing need to improve program integrity in postsecondary education.

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Kent McGaughy

Antal Desai

From: Antal Desai [adesai@cpmg-inc.com]
Sent: Tuesday, December 08, 2009 9:37 AM
To: madeline_gitomer@help.senate.gov
Cc: Bergeron, David; Manheimer, Ann; Kent McGaughy; Lee Godown
Subject: Negotiated Rulemaking

Dear Madeline:

We hope you are well. We know you are hard at work on many important issues facing the country, including education, and we are writing to remind you of the pressing need to improve program integrity in postsecondary education.

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Best Regards,

Kent McGaughy

Antal Desai

From: Antal Desai [adesai@cpmg-inc.com]
Sent: Monday, December 07, 2009 7:11 PM
To: spiros.protopsaltis@mail.house.gov
Cc: Bergeron, David; Manheimer, Ann; Lee Godown; Kent McGaughy
Subject: Negotiated Rulemaking

Dear Spiros:

We hope you are well. We know you are hard at work on many important issues facing the country, including education, and we are writing to remind you of the pressing need to improve program integrity in postsecondary education.

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Best Regards,

Kent McGaughy

Antal Desai

From: Antal Desai [adesai@cpmg-inc.com]
Sent: Monday, December 07, 2009 7:12 PM
To: sherry.orbach@franken.senate.gov
Cc: Bergeron, David; Manheimer, Ann; Kent McGaughy; Lee Godown
Subject: Negotiated Rulemaking

Dear Sherry:

We hope you are well. We know you are hard at work on many important issues facing the country, including education, and we are writing to remind you of the pressing need to improve program integrity in postsecondary education.

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Kent McGaughy

Antal Desai

From: Antal Desai [adesai@cpmg-inc.com]
Sent: Monday, December 07, 2009 7:23 PM
To: Mikael.Moore@mail.house.gov
Cc: Bergeron, David; Manheimer, Ann; Kent McGaughy; Lee Godown
Subject: Negotiated Rulemaking

Dear Mikael:

We hope you are well. We know you are hard at work on many important issues facing the country, including education, and we are writing to remind you of the pressing need to improve program integrity in postsecondary education.

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Kent McGaughy

Antal Desai

From: Antal Desai [adesai@cpmg-inc.com]
Sent: Monday, December 07, 2009 7:17 PM
To: bethany_little@help.senate.gov; luke_swarthout@help.senate.gov
Cc: Bergeron, David; Manheimer, Ann; Kent McGaughy;
wdunn@pstrategies.com
Subject: Negotiated Rulemaking

Dear Bethany and Luke:

We hope you are well. We know you are hard at work on many important issues facing the country, including education, and we are writing to remind you of the pressing need to improve program integrity in postsecondary education.

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Kent McGaughy

Antal Desai

From: Antal Desai [adesai@cpmg-inc.com]
Sent: Monday, December 07, 2009 7:21 PM
To: moira_lenehan@brown.senate.gov
Cc: Bergeron, David; Manheimer, Ann; Lee Godown; Kent McGaughy
Subject: Negotiated Rulemaking

Dear Moira:

We hope you are well. We know you are hard at work on many important issues facing the country, including education, and we are writing to remind you of the pressing need to improve program integrity in postsecondary education.

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Best Regards,

Kent McGaughy

Antal Desai

From: Antal Desai [adesai@cpmg-inc.com]
Sent: Monday, December 07, 2009 7:25 PM
To: jeff.appel@mail.house.gov; julie.radocchia@mail.house.gov
Cc: Bergeron, David; Manheimer, Ann; Kent McGaughy; Lee Godown
Subject: Negotiated Rulemaking

Dear Jeff and Julie:

We hope you are well. We know you are hard at work on many important issues facing the country, including education, and we are writing to remind you of the pressing need to improve program integrity in postsecondary education.

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