From: Michael Dakduk

Sent: Friday, March 3, 2017 3:31 PM **To:** Eitel, Robert; Manning, James

Cc: Deepti Taneja

Subject: RE: Meeting request--CECU

Will do and thanks again.

From: Eitel, Robert [mailto: (b)(6)

Sent: Friday, March 03, 2017 3:31 PM **To:** Michael Dakduk; Manning, James

Cc: Deepti Taneja

Subject: RE: Meeting request--CECU

When you arrive at the Department, ask for me. Security will call, and I will come down and escort you upstairs. Thanks.

From: Michael Dakduk [mailto:michael.dakduk@career.org]

Sent: Friday, March 03, 2017 3:28 PM **To:** Eitel, Robert; Manning, James

Cc: Deepti Taneja

Subject: RE: Meeting request--CECU

Wed at 9am is perfect. Thanks Bob! And sorry for calling you Rob. My mistake.

From: Eitel, Robert [mailto:(b)(6)

Sent: Friday, March 03, 2017 3:25 PM **To:** Michael Dakduk; Manning, James

Cc: Deepti Taneja

Subject: RE: Meeting request--CECU

Mike:

Thank you for your emails. I apologize for the delay in getting back to you.

Jim and I can meet with you next week. He and I will meet with you concerning ACICS, and Jim will confer with you concerning the DTR and GE matters.

How do you look on Wednesday, March 8 at 9:00 a.m.?

Regards, Bob Eitel

Robert S. Eitel Special Assistant to the Secretary of Education U.S. Department of Education 400 Maryland Avenue, S.W.

Washington, D.C. 20202

(b)(6)	

From: Michael Dakduk [mailto:michael.dakduk@career.org]

Sent: Friday, March 03, 2017 11:19 AM **To:** Manning, James; Eitel, Robert

Cc: Deepti Taneja

Subject: RE: Meeting request--CECU

Jim and Rob:

We recently met with staff at the White House regarding ACICS, among other issues. We were hoping to chat with one or both of you in the near future. I completely understand that your schedules may be jammed, but the sooner we can discuss the issue the better. Do you have availability next week for a meeting or call?

Regards,

Mike

From: Michael Dakduk

Sent: Tuesday, February 28, 2017 10:50 AM

To: (b)(6) (h)(6)

Cc: Deepti Taneja

Subject: Meeting request--CECU

Jim and Rob:

I trust all is well on your end. Steve Gunderson and I are hoping to meet with you very soon on the issues of ACICS, Gainful Employment and Borrower Defense. Is it possible to coordinate this with either of you or one of your assistants?

Regards,

Mike

Michael Dakduk

Executive Vice President & Director of Government Relations
Career Education Colleges and Universities
1530 Wilson Blvd., Suite 1050
Arlington, VA 22209
571-970-6338 (Direct)
michael.dakduk@career.org
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From: Michael Dakduk

Sent: Thursday, March 9, 2017 11:09 AM

To: Eitel, Robert; Manning, James

Cc: Steve Gunderson

Subject: Follow up to meeting

Attachments: 005 - Motion for TRO and PI and Memo in Support.pdf; 016 - ACICS's Supp. Mem. In

Support of PI.PDF; Excerpts from ACICS PI Hearing.pdf

Bob and Jim:

Thank you both again for taking the time to chat. We really appreciate the courtesy of a meeting. As promised, attached you will find relevant docs on the ACICS proceedings. Included is a pdf labeled "Excerpts from ACICS..." with highlighted sections of importance. Towards the end of the doc you will find recognition from the judge we alluded to in the meeting. I hope this helps. Please let us know how we can be helpful moving forward.

Regards,

Mike

Michael Dakduk

Executive Vice President & Director of Government Relations
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1530 Wilson Blvd., Suite 1050
Arlington, VA 22209
571-970-6338 (Direct)
michael.dakduk@career.org
career.org|YouTube|Twitter|Facebook



From: Michael Dakduk

Sent: Thursday, March 9, 2017 11:21 AM

To: Eitel, Robert; Manning, James

Cc: Steve Gunderson

Subject: RE: Follow up to meeting

Sorry for the additional email. We wanted you to know that we are drafting a memo on the inability of other national accreditors to handle the 690 or so campuses stuck in transition. Once we get the info, we will send to you asap.

Thanks!

Mike

Michael Dakduk

Executive Vice President & Director of Government Relations Career Education Colleges and Universities 1530 Wilson Blvd., Suite 1050 Arlington, VA 22209 571-970-6338 (Direct) michael.dakduk@career.org



From: Michael Dakduk

Sent: Thursday, March 09, 2017 11:09 AM

career.org | YouTube | Twitter | Facebook

To:(b)(6)

Cc: Steve Gunderson

Subject: Follow up to meeting

Bob and Jim:

Thank you both again for taking the time to chat. We really appreciate the courtesy of a meeting. As promised, attached you will find relevant docs on the ACICS proceedings. Included is a pdf labeled "Excerpts from ACICS..." with highlighted sections of importance. Towards the end of the doc you will find recognition from the judge we alluded to in the meeting. I hope this helps. Please let us know how we can be helpful moving forward.

Regards,

Mike

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571-970-6338 (Direct)
michael.dakduk@career.org
career.org | YouTube | Twitter | Facebook



From: Michael Dakduk

Sent: Friday, March 10, 2017 10:37 AM **To:** Eitel, Robert; Manning, James

Cc: Steve Gunderson

Subject: RE: Follow up to meeting

Attachments: Excerpts from ACICS PI Hearing.pdf

Bob and Jim:

Attached is one more transcript from the court hearing.

Enjoy the weekend!

Mike

Michael Dakduk

Executive Vice President & Director of Government Relations
Career Education Colleges and Universities
1530 Wilson Blvd., Suite 1050
Arlington, VA 22209
571-970-6338 (Direct)
michael.dakduk@career.org

career.org|YouTube|Twitter|Facebook



From: Michael Dakduk

Sent: Thursday, March 09, 2017 11:21 AM

To:(b)(6)

Cc: Steve Gunderson

Subject: RE: Follow up to meeting

Sorry for the additional email. We wanted you to know that we are drafting a memo on the inability of other national accreditors to handle the 690 or so campuses stuck in transition. Once we get the info, we will send to you asap.

Thanks!

Mike

Executive Vice President & Director of Government Relations
Career Education Colleges and Universities
1530 Wilson Blvd., Suite 1050
Arlington, VA 22209
571-970-6338 (Direct)

michael.dakduk@career.org

career.org | YouTube | Twitter | Facebook



From: Michael Dakduk

Sent: Thursday, March 09, 2017 11:09 AM **To:** robert.eitel@ed.gov; james.manning@ed.gov

Cc: Steve Gunderson

Subject: Follow up to meeting

Bob and Jim:

Thank you both again for taking the time to chat. We really appreciate the courtesy of a meeting. As promised, attached you will find relevant docs on the ACICS proceedings. Included is a pdf labeled "Excerpts from ACICS..." with highlighted sections of importance. Towards the end of the doc you will find recognition from the judge we alluded to in the meeting. I hope this helps. Please let us know how we can be helpful moving forward.

Regards,

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From: Michael Dakduk

Sent: Monday, March 13, 2017 3:26 PM

To: Manning, James; Eitel, Robert

Subject: National Accreditor Letter on ACICS
Attachments: WASHINGTON-#2096772-v2-ABHES_-

_Ltr_to_Steve_Gunderson_re_Provisional_Pro....pdf

Jim and Bob:

Attached you will find one letter from the head of ABHES. This is regarding the challenges faced in absorbing ACICS accredited schools. We will send you the others once we receive.

Regards,

Mike

Michael Dakduk

Executive Vice President & Director of Government Relations
Career Education Colleges and Universities
1530 Wilson Blvd., Suite 1050
Arlington, VA 22209
571-970-6338 (Direct)

michael.dakduk@career.org

career.org|YouTube|Twitter|Facebook



From: Michael Dakduk

Sent: Wednesday, March 15, 2017 4:20 PM

To: Eitel, Robert

Subject: Call?

You have time to chat for 5mins tomorrow?

career.org|YouTube|Twitter|Facebook

Michael Dakduk

Executive Vice President & Director of Government Relations
Career Education Colleges and Universities
1530 Wilson Blvd., Suite 1050
Arlington, VA 22209
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Join us at the 2017 CECU Annual
Convention & Exposition: CONNECTIONS
June 6-8 | The Mirage Hotel | Las Vegas, NV

Registration is now open!
Learn more at cecuevents.org

Eitel, Robert

From: Eitel, Robert

Sent: Wednesday, March 15, 2017 4:21 PM

To: Michael Dakduk

Subject: RE: Call?

Yes. I am also available now.

From: Michael Dakduk [mailto:michael.dakduk@career.org]

Sent: Wednesday, March 15, 2017 4:20 PM

To: Eitel, Robert **Subject:** Call?

You have time to chat for 5mins tomorrow?

Michael Dakduk

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michael.dakduk@career.org
career.org|YouTube|Twitter|Facebook



Eitel, Robert

From: Sent:	Eitel, Robert Monday, March 20, 2017 9:20 AM
To:	Michael Dakduk
Subject:	Re: National Accreditor Letter on ACICS
Jubject.	Ne. National Accreditor Letter on Acres
Mike:	
Do you have time for	a quick chat?
Bob	
Sent from my iPhone	
> On Mar 13, 2017, a >	t 3:26 PM, Michael Dakduk <michael.dakduk@career.org> wrote:</michael.dakduk@career.org>
> Jim and Bob:	
>	
	nd one letter from the head of ABHES. This is regarding the challenges faced in edited schools. We will send you the others once we receive.
>	
> Regards,	
>	
> Mike	
> NA: ala a al Daladada	
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> Education Colleges and Universities

Michael Dakduk From: Sent: Monday, March 20, 2017 9:24 AM To: Eitel, Robert RE: National Accreditor Letter on ACICS Subject: Of course. Call you now? Michael Dakduk Executive Vice President & Director of Government Relations Career Education Colleges and Universities 1530 Wilson Blvd., Suite 1050 Arlington, VA 22209 571-970-6338 (Direct) michael.dakduk@career.org career.org|YouTube|Twitter|Facebook ----Original Message-----From: Eitel, Robert [mailto Sent: Monday, March 20, 2017 9:20 AM To: Michael Dakduk Subject: Re: National Accreditor Letter on ACICS Mike: Do you have time for a quick chat? Bob Sent from my iPhone > On Mar 13, 2017, at 3:26 PM, Michael Dakduk <michael.dakduk@career.org> wrote: > > Jim and Bob: > Attached you will find one letter from the head of ABHES. This is regarding the challenges faced in absorbing ACICS accredited schools. We will send you the others once we receive. > Regards, > Mike > Michael Dakduk > Executive Vice President & Director of Government Relations Career

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> 1530 Wilson Blvd., Suite 1050
> Arlington, VA 22209
> 571-970-6338 (Direct)
> michael.dakduk@career.org<mailto:michael.dakduk@career.org>
> career.org<http://www.career.org/>|YouTube<https://www.youtube.com/cha
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> Pro....pdf>
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From: Michael Dakduk Sent: Monday, March 20, 2017 9:41 AM To: Eitel, Robert Subject: RE: National Accreditor Letter on ACICS Can you call Steve's line soon? (b)(6) Michael Dakduk Executive Vice President & Director of Government Relations Career Education Colleges and Universities 1530 Wilson Blvd., Suite 1050 Arlington, VA 22209 571-970-6338 (Direct) michael.dakduk@career.org career.org|YouTube|Twitter|Facebook ----Original Message-----From: Eitel, Robert [mailto:(b)(6) Sent: Monday, March 20, 2017 9:20 AM To: Michael Dakduk Subject: Re: National Accreditor Letter on ACICS Mike: Do you have time for a quick chat? Bob Sent from my iPhone > On Mar 13, 2017, at 3:26 PM, Michael Dakduk <michael.dakduk@career.org> wrote: > Jim and Bob: > Attached you will find one letter from the head of ABHES. This is regarding the challenges faced in absorbing ACICS accredited schools. We will send you the others once we receive. > Regards,

>

> Mike

```
> Michael Dakduk
> Executive Vice President & Director of Government Relations Career
> Education Colleges and Universities
> 1530 Wilson Blvd., Suite 1050
> Arlington, VA 22209
> 571-970-6338 (Direct)
> michael.dakduk@career.org<mailto:michael.dakduk@career.org>
> career.org<http://www.career.org/>|YouTube<https://www.youtube.com/cha
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> Pro....pdf>

Eitel, Robert

From: Eitel, Robert

Sent: Monday, March 20, 2017 9:53 AM

To: Michael Dakduk

Subject: Re: National Accreditor Letter on ACICS

Yes.

Sent from my iPhone

On Mar 20, 2017, at 9:41 AM, Michael Dakduk < michael.dakduk@career.org > wrote:

Can you call Steve's line soon?

Michael Dakduk
Executive Vice President & Director of Government Relations
Career Education Colleges and Universities
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Arlington, VA 22209
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michael.dakduk@career.org
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----Original Message-----

From: Eitel, Robert [mailto:(b)(6)

Sent: Monday, March 20, 2017 9:20 AM

To: Michael Dakduk

Subject: Re: National Accreditor Letter on ACICS

Mike:

Do you have time for a quick chat?

Bob

Sent from my iPhone

> On Mar 13, 2017, at 3:26 PM, Michael Dakduk < michael.dakduk@career.org > wrote:

>

> Jim and Bob:

>

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faced in absorbing ACICS accredited schools. We will send you the others once we receive.
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> Regards,
> Mike
> Michael Dakduk
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From: Steve Gunderson

Sent: Thursday, March 23, 2017 9:17 AM

To: Eitel, Robert

Subject: Any chance of a Phone call?

Robert:

Any chance we could talk this morning? I have a quick question.

My cell is (b)(6)

Thanks.

Steve

Steve Gunderson

President & CEO

Career Education Colleges and Universities (CECU) 1530 Wilson Blvd., Suite 1050 Arlington, VA 22209

www.career.org

From: Steve Gunderson

Sent: Tuesday, April 4, 2017 8:54 AM

To: Eitel, Robert

Cc: Michael Dakduk

Subject: The Negotiations on ACICS

Robert:

In the midst of all that you are working on, I feel a need to write with strong encouragement to help us get the Out-of-court settlement for ACICS resolved. (The lawyers for ACICS say their latest proposal is at the Department awaiting a response.)

We would ideally like a reversal of the decisions made by the last Secretary. And the court filing last Friday by ACICS showing that 36,000 pages of documents had been demanded by Ted Mitchel and then never reviewed by anyone at the Department gives you the opportunity to reverse that decision. But, if that is not possible, our schools DESPERATELY need revisions in the PPPA. Here is an example of the anxiety and inability of our schools to do anything while all this gets debated in Washington. I rec'd this email yesterday from one of our best schools with multiple campuses:

As related to ACICS, from the beginning it was clear that what ACICS needs is not necessarily in line with what the schools need, to in-fact survive.

Specifically -- while ACICS is looking for some form or re-recognition along with time to remedy their issues, we schools need ECAR approvals to refresh programs to transition to another accreditor and then time to move to another accreditor.

Put another way..... we all need time, and we all need it sooner than later. And while ACICS needs both the re-recognition and time, (as surmised as their position in their negotiations), we schools just need the time. This suggests that if the schools are waiting for the DOJ/ACICS negotiations to pave the future path – we

could be exposed.

Is there any way in your mind, that the DOE could make a statement in terms of time relief on the PPA terms independent of the ACICS negotiations?

Getting changes in PPPA would make it possible for the schools to survive and move forward while negotiations continue.

Thanks for all you are doing!

Steve

From: Steve Gunderson

Sent: Wednesday, April 12, 2017 8:26 AM

To: Eitel, Robert (b)(6) Manning, James

Cc: Michael Dakduk

Subject: Follow-up on Request for DeVos Meeting **Attachments:** Feb 9 DeVos request for meeting.pdf

Robert, Josh and Jim:

First, thanks so much for yesterday's meeting. The decision by the past administration to deny participation in Title IV programs to the Globe Schools in Wisconsin and the Dakotas represents one of the most blatant political/ideological decisions I've seen by any administration in all my years in government. My hope is that you will take the appropriate actions to provide some level of justice to the incredible work of this family over so many years.

Second, yesterday's meeting was not the appropriate time to share with you the push-back I have received from my members when they learned the Secretary was meeting with the leaders of four higher education associations and not us. While I have attempted to explain/defend that decision as a strategic one, all of you can understand the difficulty in explaining how those who opposed the election of President Trump get meetings with the Secretary before the one sector that generally supported his candidacy.

I have attached our request for such a meeting sent to the Secretary on February 9th right after her confirmation. My hope is that one or more of you can help us find a time on her schedule to meet with her in the near future. The challenges our sector continues to face with GE, the ACICS situation, and Borrower Defense to Repayment are huge. Somehow, someway, we must bring some regulatory relief to this sector in ways that put all of higher education on the same equal footing, or we will continue to see more schools close down and more students denied access to the occupational education they so desperately need.

No one respects the demands on your schedules, and all the work you are doing. In many ways, I feel guilty even sending this request. But the lack of action on any of our major issues is becoming such a significant issue among our membership that I must again reach out in hopes that we might be able to set up a meeting with the Secretary in order to address some of these huge problems facing this sector.

Thanks for all you do. We stand ready to work with you in every way to achieve a level of equity and fairness in the delivery of postsecondary career education.

Sincerely,

Steve

From: Steve Gunderson

Sent: Tuesday, April 25, 2017 7:43 AM
To: Venable, Joshua; Manning, James
Cc: Michael Dakduk; Kelley Blanchard
Subject: Keynoting our Annual Convention

Attachments: DeVos Invite_Convention 2017.pdf; James Manning invite.pdf

Joshua and Jim:

Both of you understand the impact of the past eight years on postsecondary career education schools. We've lost over 1,000 campuses and our annual enrollments have declined by 1.6 million. The sector is in a state of shock. The election of Donald Trump has renewed this sector's sense of hope for the future.

It is in this background that we have extended invitations to both Secretary DeVos and to Jim to keynote our annual convention in Las Vegas on Thursday, June 8th. Our preference is for either Secretary DeVos or Acting UnderSecretary Manning to keynote this conference in person. Of course, we understand the challenges of time and travel. If an inperson appearance is not possible we are prepared to use a live Skype presentation to bring to our convention attendees the most current information from the Department on issues of importance to our sector.

While we respect the challenges of early schedule commitments, I know that both of you understand the challenge of holding your most important keynote speech open awaiting a decision from the Department as to their availability to join you for the event. What can we do to facilitate a positive answer to this request? Can you provide us any sense of when you will be able to make a decision?

Sincere thanks for all you do! We appreciate it far more than you will ever know or understand.

Steve

From: Steve Gunderson

Sent: Monday, May 8, 2017 7:49 AM

To: Venable, Joshua

Subject: If not her, maybe you?

Attachments: DeVos Invite_Convention 2017.pdf

Importance: High

Josh:

My hope is you are surviving the incredible demands on your time! So, I apologize for adding to the list. But it won't surprise you at all to know that as we near our convention we need to get an answer as to whether the Secretary will be able to keynote the convention; either in person or via Skype. (We really want to be flexible.)

But, if she can't make it, what are the chances that you would consider speaking to us? It would be a great opportunity for the Department to share their vision for Higher Education to the one sector that supported the president's election and endorsed the Secretary's confirmation.

But, I really need an answer. Give me a call at any time. (Cell:



Thanks!

Steve

From: Steve Gunderson

Sent: Tuesday, June 6, 2017 7:39 AM

To: Eitel, Robert
Subject: Quick Question

Robert:

I am in Vegas for the beginning of our Annual Convention. Anything we should know or be saying as it relates to ACICS, or BDR?

Steve

Steve Gunderson

President & CEO

Career Education Colleges and Universities (CECU) 1530 Wilson Blvd., Suite 1050 Arlington, VA 22209

www.career.org



From: Steve Gunderson

Sent: Wednesday, June 21, 2017 10:53 AM

To: Venable, Joshua; Eitel, Robert; Manning, James

Subject: Confidential

Colleagues:

This comes to you as a friend!

The email below was recently sent to some key Republicans in this town from someone who is concerned about Dr. Wayne Johnson. I have never met Mr. Johnson, and I have no reason to personally/professionally oppose him. (Actually, I find his interest in modernization of the financial aid processes to be of great interest!) But I did want you to be aware of the concerns raised. Here is the email conversation that arrived this morning.

This from my 45-year very good friend Dave Beck ...if Dave says this guy is bad, then the guy is bad.

	Best,
	(b)(6)
	Original Message
	Subject: Secretary of Education Betsy DeVos Announces Intent to Appoint Dr. A. Wayne Johnson as
	Chief Operating Officer of Federal Student Aid U.S. Department of Education
	Date: Tue, 20 Jun 2017 19:58:48 -0700
	From: David C. Beck ≤ (b)(6)
	To: Kathy G Lubbers (b)(6) "Terry C. Balderson"
	(b)(6)
	This refers to a former partner of mine (b)(6)
(b)(6)	
	(b)(6)
	(0)(0)

d

I just wanted you to know this was being circulated among Republican friends.

Steve

Steve Gunderson

President & CEO

Career Education Colleges and Universities (CECU)

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Arlington, VA 22209 www.career.org

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Register here and see why it's important to attend.

Newman, Jessica

From: Newman, Jessica

Sent: Friday, June 30, 2017 3:31 PM

To: Steve Gunderson

Cc: Smith, Kathleen; Eitel, Robert

Subject: Re: Checking on our invitation to the Secretary

Steve,

Good afternoon. I hope you are doing well. I wanted to connect you to Kathleen Smith and Bob Eitel, copied, here at the Department of Education. At this time we are not able to schedule a meeting for you with Secretary DeVos, but Kathleen and Bob are happy to meet with you or speak with you over the phone in the near future. Please reach out to Kathleen and Bob directly if you'd like to talk with them.

Thank you, Jessica

From: Newman Jessica (b)(6)

Date: Tuesday, May 23, 2017 at 6:26 PM

To: Steve Gunderson < steve.gunderson@career.org > **Subject:** Re: Checking on our invitation to the Secretary

Thank you Steve. I recently started in this role as scheduler, so I apologize for the delay you've experienced. Let me look at this meeting request and I will circle back with you soon.

Have a good evening,

Jessica

From: Steve Gunderson < steve.gunderson@career.org>

Date: Tuesday, May 23, 2017 at 6:16 PM

To: Newman Jessica (h)(6)

Subject: RE: Checking on our invitation to the Secretary

Jessica:

We don't give up easily, because we are challenged by the lack of responses on all of our requests. On February 9th, we wrote to request a meeting with the Secretary on behalf of Members of our Board of Directors and CECU's senior leadership. We have still not heard a response to this request, either. So despite being the one sector that supported the President's campaign, and supported the Secretary's nomination we have yet to be given any opportunity for engagement with the Secretary. This is hard to explain to our members!

Sincerely,

Steve Gunderson

From: Newman, Jessica [mailto (b)(6)

Sent: Tuesday, May 23, 2017 6:08 PM

To: Steve Gunderson

Subject: Re: Checking on our invitation to the Secretary

Steve,

Good afternoon and thank you for your kind invitation for Secretary DeVos to speak at the Career Education Colleges and Universities convention next month. We regret that she is not able to attend due to scheduling conflicts. We wish you a successful event! Please keep Secretary DeVos in mind for the future.

All the best, Jessica

From: Steve Gunderson < steve.gunderson@career.org>

Date: Monday, May 15, 2017 at 3:31 PM

To: Newman Jessica (Invier)

Subject: Checking on our invitation to the Secretary

Hi Jessica:

I know that you have heard from many folks – including Jim Manning internally and Speaker Newt Gingrich externally – as we all try to confirm the Secretary's keynote speech to our convention on Thursday, June 8th in Las Vegas. We have offered to consider her speaking to us from Washington by Skype if that opportunity might work for her.

We are the only sector of higher education that supported the President's election; and the only sector to endorse Secretary DeVos' confirmation. So we certainly hope this can happen.

I will be on business travel this week, so the best way to reach me is either by email or my cell phone: 703-517-3540.

We look forward to working with you and the Secretary to make this happen. It would be a good, friendly higher education audience!

Sincere thanks for all you do.

Steve Gunderson

From: Steve Gunderson

Sent: Tuesday, August 1, 2017 3:21 PM

To: Manning, James; Eitel, Robert; Smith, Kathleen

Subject: The emering Crisis with ACICS Schools

Jim, Robert and Kathleen:

I know all of you are intimately involved in trying to resolve the ACICS crisis. Without going into all the details we are increasingly worried that unless some legislative action is advanced to provide the schools with additional time to seek new accreditation we will have created a new disaster with schools losing accreditation and students losing an education. Recently the head of the Virginia Association shared with us that of the 11,000 students in Virginia enrolled in ACICS accredited schools, over 9,000 of those students are enrolled in schools that have not yet been accredited by a new accreditor. It is, unfortunately, an example of the state of play nationwide.

We are increasingly convinced we must seek a rider on the Appropriations Bills to achieve some level of additional time for schools to pursue alternative accreditation. Can you provide us any further updates from the Department's perspective before we begin this push. We do not want our constructive actions to be harmful to any conversations that might be happening.

Thanks!

Steve Gunderson

From: Steve Gunderson

Sent: Tuesday, September 12, 2017 10:28 AM

To: Venable, Joshua
Cc: Michael Dakduk

Subject: CECU Letter to Secretary DeVos **Attachments:** Secretary DeVos 9-12-17.pdf

Hi Josh:

We want to commend Secretary DeVos on her upcoming "Rethink School" tour. In doing so, she emphasizes an important foundation of America's education. We know every student learns in a different way; and, we've designed an education delivery system that can respond to these diverse student needs in the best possible way.

As she finalizes her tour, I want to invite her to also include a visit to one of our nation's post-secondary career education schools. Today, this sector serves over 2.3 million students annually in a combination of lectures and laboratory experience that prepare students for careers! We are especially proud of our two-year and less programs where our graduation rates are at 60 percent, far exceeding those of other sectors.

We look forward to working with you and the Secretary to make this happen.

Sincere thanks for all you do.



September 12, 2017

The Honorable Betsy DeVos Secretary, Department of Education 400 Maryland Avenue, S.W. Washington, D.C. 20202

Dear Madam Secretary:

We want to commend you on your upcoming "Rethink School" tour. In doing so, you emphasize an important foundation of America's education. We know every student learns in a different way; and, we've designed an education delivery system that can respond to these diverse student needs in the best possible way.

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By 2024, the Bureau of Labor Statistics projects our nation will need 46.5 million new workers. Our sector has committed to providing over 5 million new career professionals in the decade. Many of our schools represent multi-generation family investments in the education of their communities around priority skills. You would find our students inspiring and our schools reflective of an accelerated academic program resulting in real jobs with real wages for our graduates.

Whether it is Wyoming, Kansas, Missouri, Nebraska or any other state on your tour, please let us know if you might have two hours to include a visit to one of our schools. And don't worry about any advanced notice. Our schools are always ready for such a visit. All we ask is that you plan your visit in the morning or evening because most of our students still hold full-time jobs while attending schools, so the afternoons are usually the quiet time.

With the results of the recent hurricanes, we encourage you to visit some of our schools preparing students in the construction trades. We are working to help meet the nation's immediate needs!

Have your staff give me a call. I can be reached at 703-567-1685. We'll have a school ready to welcome you as soon as you arrive!

Sincerely,



Steve Gunderson President & CEO

Venable, Joshua

From: Venable, Joshua

Sent: Wednesday, September 13, 2017 8:23 AM

To: Steve Gunderson
Cc: Michael Dakduk

Subject: Re: CECU Letter to Secretary DeVos

Hi Steve,

Thanks for your note. The stops for the tour are already set, but we'll keep this in mind for the future.

Josh

Sent from my iPhone

On Sep 12, 2017, at 08:28, Steve Gunderson < steve.gunderson@career.org wrote:

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We look forward to working with you and the Secretary to make this happen.

Sincere thanks for all you do.

From: Steve Gunderson

Sent: Wednesday, September 13, 2017 8:35 AM

To: Venable, Joshua
Cc: Michael Dakduk

Subject: RE: CECU Letter to Secretary DeVos

Josh:

Thanks for the response. I know how busy you are. We would love to host. We also have some great schools teaching carpentry should you want to have her visit a school preparing students to help rebuild the south after the hurricanes. The Secretary would not get a more cordial welcome anywhere – than she would receive at one of our schools!

Steve

From: Venable, Joshua [mailto: (b)(6)

Sent: Wednesday, September 13, 2017 8:23 AM

To: Steve Gunderson **Cc:** Michael Dakduk

Subject: Re: CECU Letter to Secretary DeVos

Hi Steve,

Thanks for your note. The stops for the tour are already set, but we'll keep this in mind for the future.

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We look forward to working with you and the Secretary to make this happen.

Sincere thanks for all you do.

Steve Gunderson

President & CEO

Career Education Colleges and Universities (CECU)

1530 Wilson Blvd., Suite 1050

Arlington, VA 22209

www.career.org

<Secretary DeVos 9-12-17.pdf>

Mayes, Edgar

From: Sent: To: Subject:	Delahunty, Sarah Monday, May 08, 2017 12:56 PM Mayes, Edgar RE: Speaker Newt Gingrich contact for Secretary DeVos
I will handle. Thanks!	
Sarah Delahunty Office of the Secretary United States Department of Educo: 202-453-5615 C: 202-480-1542	
From: Mayes, Edgar On Behalf (Sent: Monday, May 08, 2017 12:: To: Delahunty, Sarah Subject: FW: Speaker Newt Ging	30 PM
Sarah ~	
Would like to handle or should	I acknowledge with the appropriate contact information for Jessica?
Thank you, Edgar	
From: John Hines [mailto/hv/6) Sent: Monday, May 08, 2017 11:0 To: DeVos, Betsy Subject: Speaker Newt Gingrich of	DB AM
Good morning,	
,	locate the best contact information for Secretary DeVos and eaker Gingrich's personal email below.
Please do not hesitate to contact	me with any additional questions.
Speaker Gingrich email: (b)(6)	
Best,	
- John Hines Gingrich Productions	

Kegler, Tarkishia [Tarkishia Kegler@ed.gov] To: FW: Delta Career Education Rebuttal to Student Advocates Coalition letter of 22 March Subject: Fri 3/24/2017 12:44:52 PM Sent: Mayes, Edgar From: McCann Delta Response 23 March 2017.pdf Good Morning Kishia, Please assign to e-mail with attachment to OPE. Thanks, Edgar From: Mayes, Edgar On Behalf Of DeVos, Betsy Sent: Friday, March 24, 2017 7:51 AM To: 'john.olsen@deltaed.com' Subject: FW: Delta Career Education Rebuttal to Student Advocates Coalition letter of 22 March

Dear Mr. Olsen:

Thank you for your e-mail to Secretary of Education Betsy DeVos. We appreciate hearing from you.

Your communication has been forwarded to the appropriate staff member for review and further handling.

Thank you again for contacting us.

Sincerely,

Edgar Mayes

Director of Correspondence and Communications Control Unit Office of the Secretary U.S. Department of Education Washington, DC 20202 From: John Olsen [mailto:john.olsen@deltaed.com]
Sent: Thursday, March 23, 2017 5:40 PM
To: DeVos, Betsy; lamar.alexander@mail.senate.gov;
patty.murray@mail.senate.gov; virginia.foxx@mail.house.gov;
bobby.scott@mail.house.gov
Cc: Charles Brissman; Steve Gunderson; david_cleary@help.senate.gov
Subject: Delta Career Education Rebuttal to Student Advocates Coalition
letter of 22 March

Secretary DeVos;

Attached, please find Delta Career Education Corporation's response to claims made by the coalition of student advocates in their letter to members of congress dated 22 March 2017.

I am happy to answer any follow-on questions you might have.

Thank you for your consideration of our views.

John Olsen

John P. Olsen

CEO

Delta Career Education Corporation

99 Canal Center Plaza, suite 500

Alexandria, VA 22314

Ph. 703.842.5110



703.842.5100 • FAX 703.842.5299 • www.deltaed.com

23 March 2017

The Honorable Betsy DeVos U.S. Department of Education 400 Maryland Avenue, SW Washington, D.C. 20202

Dear Secretary DeVos:

I am responding to the student advocates group's letter dated March 22 conveying their strong support for the continued implementation of Department of Education accountability regulations. I am the President and Chief Executive Officer of Delta Career Education Corporation, the owner and operator of the McCann School of Business and Technology. The school and the Medical Assisting ASB degree program at its Hazleton, Pennsylvania campus are highlighted in their letter. I am writing to provide more context on the outcomes data cited in the letter and to rebut affirmatively the implication that we are bad actors in postsecondary education.

First, let me say that most of the data cited in the article is technically correct. We produced the data based on the templates and definitions created by the Department of Education. As I have learned in working in K-12 and postsecondary education over the past 15 years, however, there is more than one way to define an outcome. And, based on one's ideology, a definition can vary greatly. Unfortunately, the student advocates group's letter cherry-picks data to support their argument and has sucked in a number of reporters looking to extend the narrative of alleged victims of proprietary postsecondary education.

Regarding the metrics cited:

1. On-Time graduation Rate is 7%. While this is true, the actual graduation rate to date for this same cohort of students is 52% with one more student on track to graduate in May. It is very common for our students to take breaks during the program due to life circumstances. And, for most, graduating on-time is not a priority. Half of our students have children and many of them are single mothers. As a result, disruptions in childcare can very often lead to students leaving their program temporarily. We also see that students will take breaks to take a job and make some money, but then return to their studies at a later date. We stay in contact with these students and encourage them to re-enroll and complete their programs because anything short of graduation and job placement is a failure in our mission. To be balanced, if you compare McCann's Hazleton campus to the local community college, we are graduating similar students at twice the rate. If you compare the community college's graduation rate to our rate to date, it is three times their graduation rate.

- 2. Placement rate of 47% While this is true during this past year's reporting period, our placement rate for this same program has been 88% for the past two years. There were several individual circumstances that led to decreased placement this year. Since the reporting period ended, however, we have placed two other students and we have five more students who have completed their certification and are actively seeking employment with our help. When we place all of those students, our placement rate for this same program will be 73%. In addition, another 11% of our graduates either gave birth and elected to remain out of the workforce, or decided to stay in jobs they currently have as opposed to shifting careers at this point. In short, we had an unusual year driven by unique individual issues. Our historical placement rates are more indicative of our ongoing performance.
 - 3. Graduate debt While we cannot exactly reconcile the numbers quoted in the student advocates group's letter, we have found over a four-year period from 2012 to 2016, we saw a nearly 30% increase in the debt loads of our graduates despite keeping the tuition price constant. This was driven primarily by an increase in stipends for living expenses that students elected to take. We were cited in 2010-2012 by the Department in program reviews for actively counseling students to avoid student debt. To comply, we backed off our counseling, and combined with the Department's mandate to disclose the maximum aid available to students, students elected to improve their quality of life by taking more debt for living expenses. We now work financial counseling into our career readiness courses. However, this will never be as effective as strongly counseling the students at the point in time that they make the decision to take the debt.
 - 4. Graduate earnings It is impossible to argue with the Department's earnings data because we are not allowed to verify the SSA-reported earnings of our graduates without spending significant time and resources. But, we know there are problems with the earnings estimates. The income reporting issue concerning unreported tips by barbers, hairdressers and others the personal care fields is well known. Beyond that, we are proud to serve a predominantly female student body. More than 80% of our graduates are women, with a median age of 27. When they leave us, they get jobs. But, we often hear that many of them decide to have families and may leave the full-time workforce in the relevant gainful employment reporting window to raise their kids just like any four-year college-graduate suburbanite mom who elects to make the same choice. It is the real-life decisions made by our graduates that mean we will have a significantly higher proportion zero and part-time earnings in the calculation. This is a life choice made by the graduate and is beyond our control. I would be more than happy to be measured on my graduates who work full-time and report all of their earnings.
 - 5. Program Cost While the amount cited is correct, it is not correct to say this program is a little over a year long. In our environment, this program lasts seven academic terms and a better way to think about this is as a two-year program. That said, we are in the process of gaining approvals for shorter programs that mean less tuition, less time in school and therefore, less time to incur debt. Some states have been quicker than others to approve these program changes.

One other point on data:

The U. S. Department of Education, state higher education authorities, institutional accreditors and programmatic accreditors all have mandatory data collection, reporting and publication requirements. Each of these requirements was created in a silo, to address a particular policy concern, real or perceived. For postsecondary institutions, the result is a sizeable morass of inconsistent, at times conflicting, requirements that create confusion and the opportunity for misinformation. We note that the College Scorecard was meant to cut through this morass. However, we have found examples of simplifying assumptions made by the Department analysts that result in even more confusion and misinformation. As an example, the Scorecard provides a "Salary After Attending" figure for every school, which purports to be "the median earnings of former students who received federal student aid, at 10 years after entering the school." The Scorecard provides this figure for over a dozen of our schools ... even though each of those schools has been open less than 10 years and could not possibly have any students in the "10 years after entering" category.

Lessons Learned from Implementation of the Revised GE Template:

In our attempt to be proactive from a compliance standpoint, we implemented the revised Gainful Employment Disclosure Template before the Department delayed the compliance deadline to July of this year. Our experience shows that the Template can provide very misleading information that is not contextually relevant - which flies in the face of the purpose of the disclosure requirements in the first place. Those behind the student advocates group's letter either know this and do not care, or have not done their homework. Either way, their credibility should be put to the test and they should be able to demonstrate a detailed understanding of the data and resulting analyses before their advocacy is taken at face value.

We are serious people who are very proud of the work we do for the students and communities where we operate. We serve a non-traditional student who more than 80% of the time has no money in the bank when they come to us and 70% of the time, has no known post-secondary tradition in their family. We are very focused on catering to the unique needs of our students and perform better than our community college counterparts on nearly every metric that matters. This is why students choose to come to McCann and the other Delta schools.

Very respectfully,



John Olsen President and CEO Delta Career Education Corporation

Cc:

Members of the Congressional Delegation of Georgia
Members of the Congressional Delegation of Louisiana
Members of the Congressional Delegation of Mississippl
Members of the Congressional Delegation of North Carolina
Members of the Congressional Delegation of New Mexico
Members of the Congressional Delegation of Ohio
Members of the Congressional Delegation of Pennsylvania
Members of the Congressional Delegation of South Carolina
Members of the Congressional Delegation of Tennessee
Members of the Congressional Delegation of Texas
Members of the Congressional Delegation of Virginia

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