



November 20, 2017

Federal Trade Commission
Office of the Secretary
600 Pennsylvania Avenue NW.
Suite CC-5610 (Annex D)
Washington, DC 20580

RE: Docket Number FTC-2017-0085

To Chairwoman Ohlhausen and Commissioner McSweeney:

On behalf of Student Veterans of America (SVA), an organization advocating on behalf of more than 1.1 million student veterans in higher education, we are writing in regards to the matter of Victory Media, Inc., File No. 1623210, as well as other lead generators and list purveyors in higher education.

A cottage industry thrives where companies sell their branding and services so institutions of higher education can promote themselves as “Military Friendly.” Victory Media has been determined by the FTC to use a fundamentally flawed approach involving faulty methodology, deceptive marketing, and institutional pressure. The methodologies and actions attributed by the FTC to Victory Media, as well as other lead generators and list purveyors, highlight companies and organizations engaging in conduct that exploits military-connected students. The actions of these companies and organizations result in the mistreatment of those who answered the call of selfless service, and their subsequent intent to pursue an education.

Nearly two-thirds of student veterans are the first-generation college students reporting at least one parent with some college education and no degree.¹ These entities profit off a lack of cultural knowledge and awareness about how the education system functions. These companies choose to profit from military-connected students’ desires to challenge themselves in the next chapter of their lives following their service. We completed a comprehensive review of the rankings and lists available. While some rankings are atrocious, other rankings include objective methodologies. Regardless, no ranking is without flaw, and the industry as a whole is ripe for fraud, deception, and pay-to-play schemes.

Victory Media’s Actions Impact on Servicemembers and Veterans

Veterans Education Success (VES) released a report, *Understanding Misleading Websites and “Lead Generators”: A Case Study: Victory Media’s “Military Friendly Schools,”*² evaluating Victory Media in August 2016 and updated it again in February 2017. The report’s findings included (1) Victory Media’s “military friendly schools” is a pay-to-play list, (2) “military friendly list” includes more than 250 institutions that are not even approved for participation in Department of Defense’s

¹ Student Veterans of America 2016 Census Survey, <https://studentveterans.org/images/pdf/2016-SVA-Census-Survey-Student-Veteran-General-Breakdowns-120716.pdf>.

² Student Veterans of America and Veterans Education Success, *Understanding Misleading Websites and “Lead Generators”: A Case Study: Victory Media’s “Military Friendly Schools,”* August 2016 (updated February 2017), <https://static1.squarespace.com/static/556718b2e4b02e470eb1b186/t/58bec03020099e2d8e76aaab/1488896051219/Victory+Media+Report.FINAL.2.pdf>.

Tuition Assistance Program, (3) Victory Media makes money from veterans' and servicemembers' information, and (4) Victory Media profits from schools in return for promoting said institutions.

Victory Media commands unparalleled access to veterans and spouses. Victory Media reports that at least 75,000 copies of its GI Jobs "Military Friendly Schools" edition are distributed to military posts. Dissemination of their publications include distribution through mandatory Transition Assistance Program (TAP) classes that are supposed to ease servicemembers' transition back to civilian life as well as Department of Veterans Affairs (VA) facilities and offices.

Even more problematic are the institutions Victory Media's publications highlight for our servicemembers and veterans. For example, publications painted Argosy University as military friendly; what the publications failed to acknowledge was that Argosy's six-year graduation rate is an abysmal 7 percent. Victory Media's publications similarly promoted Kaplan College, but the materials excluded the fact that 23 percent of Kaplan's programs fail the proposed gainful employment regulations. Victory Media failed to disclose its sponsorship relationships with many of these institutions.

The worst offenders with regard to academic outcomes promoted through Victory Media's various platforms are for-profit colleges. This phenomenon is demonstrated when assessing military-connected student complaints at for-profit institutions versus similar-sized public and private schools. When viewing the VA's GI Bill Comparison Tool, which lists the number of formal complaints submitted by GI Bill students, DeVry University Online has 2,935 students using GI Bill benefits and 200 complaints. This means that 14.7 percent of their GI Bill students have filed formal complaints.

Compare this to the University of Central Florida – 2,117 GI Bill students, and only a single student has submitted a complaint. The University of Phoenix Online Campus enrolls 20,740 GI Bill students and has generated 562 complaints. The American Public University System enrolls a comparable 19,037 GI Bill students yet only has 15 total complaints. Often, for-profit colleges' first line of defense is the claim that their size naturally yields more complaints, a justification that indicates complaints are acceptable in the first place but the ratio of complaints versus GI Bill students should be noted by the Commission.

The Commission should continue to use its authority to require monetary judgments from companies profiting from servicemembers and veterans who search for a school. In 2016, the Commission took a strong stance against education lead generator Expand Inc. (also doing business as Gigats, EducationMatch, SoftRock Inc. and Ayman A. Difrawi).³ This lead generator claimed to job applicants that it was pre-screening applicants for multinational companies, government agencies, and other employers. Instead, applicants were directed to contact "employment specialists" who then pushed consumers toward enrolling in education programs.

Advisors directed students solely to schools and programs that agreed to pay the defendants for leads satisfying enrollment criteria. The court order included a \$90.2 million judgment that could be satisfied upon prompt payment of \$360,000. An August 2017 lawsuit demonstrates that Expand may be continuing its harassment through unsolicited text messages.⁴

³ Federal Trade Commission, *FTC Charges Education Lead Generator with Tricking Job Seekers by Claiming to Represent Hiring Employers*, April 28, 2016, <https://www.ftc.gov/news-events/press-releases/2016/04/ftc-charges-education-lead-generator-tricking-job-seekers>.

⁴ Erin Gilmore, *Lawsuit: Expand Incorporated Sends Illegal Texts Despite Opt-Out Requests*, CLASSACTION.ORG, Aug. 18, 2017, <https://www.classaction.org/news/lawsuit-expand-incorporated-sends-illegal-texts-despite-opt-out-requests>.

Other Entities with Problematic Practices Permeate the Education Space

Although the Commission investigated Victory Media's actions, Victory Media's actions are not unique. Other entities use these types of promotions and rankings to target servicemembers and veterans.

In 2012, QuinStreet-operated GIBill.com caught the attention of at least 20 state attorneys general.⁵ In light of the name and services offered, many student veterans were misled and thought GIBill.com was a government website. Unfortunately, this website directed visitors to predatory schools that paid to be featured. One former VA employee determined GIBill.com "serves little purpose other than to funnel student veterans and convince them their options for education are limited to their advertisers."⁶ QuinStreet was forced to turn over the web address to VA as part of the settlement.⁷

QuinStreet remains active in attracting the attention of military-connected students through Military.com. Military.com provides resources relating to help pursuing an education⁸ and how best to utilize GI Bill benefits.⁹ Military.com maintains the appearance of an official government website, which is deceptive for prospective and current students. *See Appendix, Figure 1.*

Additional predatory actors continue to operate in this space. Army.com maintains the appearance of an official government website. An indiscriminate disclaimer only available at the bottom of the webpage reveals, "This web site is provided by FanMail.com, L.L.C. and is not affiliated, owned, or managed by the United States Coast Guard, the United States Army or the military and/or government of any country."¹⁰ The overall look and feel of this website is deceptive and directs visitors to Grantham University. *See Appendix, Figure 2.*

In addition to student complaints¹¹ pertaining to financial issues and student loans, 21 percent of students pay down their debt¹² at Grantham as compared to a national average of 46 percent. FanMail.com also operates Air-Force.com,¹³ which relegates its disclaimer to the bottom of the webpage. Air-Force.com's address is deceptively similar to the Air Force's official site for recruitment, which is AirForce.com.¹⁴

Servicemembers and veterans are inundated by "best" lists geared specifically toward military-connected students, but it is critical for potential students to consider the methodologies being used and what a positive school experience looks like for a servicemember or veteran.¹⁵ *Military Times'*

⁵ David Halperin, *Military-Branded Websites Push Veterans to Troubled For-Profit Colleges*, HUFFPOST, Feb. 1, 2016/Updated Feb. 1, 2017, https://www.huffingtonpost.com/davidhalperin/military-branded-websites_b_9131742.html.

⁶ Adam Weinstein, *How Pricey For-Profit Colleges Target Vets' GI Bill Money*, MOTHERJONES, Sept./Oct. 2011, <http://www.motherjones.com/politics/2011/09/gi-bill-for-profit-colleges/>.

⁷ Prior to being redirected to www.benefits.va.gov/gibill, the disclaimer states, "As a result of a legal settlement, the award of the GIBill.com domain name to VA is a victory for all Veterans and the GI Bill."

⁸ Military.com, Education, <http://www.military.com/education> (last visited Nov. 3, 2017).

⁹ Military.com, GI Bill, <http://www.military.com/education/gi-bill> (last visited Nov. 3, 2017).

¹⁰ Army.com, <http://army.com/> (last visited Oct. 24, 2017).

¹¹ Veterans Affairs GI Bill Comparison Tool, Grantham University, <https://www.vets.gov/gi-bill-comparison-tool/profile/21125916> (last visited Oct. 24, 2017).

¹² Department of Education College Scorecard, Grantham University, <https://collegescorecard.ed.gov/school/?442569-Grantham-University> (last visited Oct. 24, 2017).

¹³ Air-Force.com, <http://air-force.com/> (last visited Nov. 8, 2017).

¹⁴ AirForce.com, <https://www.airforce.com/> (last visited Nov. 8, 2017).

¹⁵ James Schmeling, *Seven Tips for Student Veteran Success*, STUDENT VETERANS OF AMERICA, <http://studentveterans.org/media-news/in-the-news/531-seven-tips-for-student-veteran-success> (last visited Nov. 18, 2017); see also Alexander McCoy, *What Makes a College Veteran Friendly?*, TASK & PURPOSE, June 15, 2015, <http://studentveterans.org/media-news/in-the-news/412-what-makes-a-college-veteran-friendly>.

“Best for Vets”¹⁶ involves institutions filling out an approximately 150-question survey about services impacting current and former servicemembers and their families.¹⁷ Five broad categories factor into the evaluation: (1) university culture, (2) academic outcomes/quality, (3) student support, (4) academic policies, and (5) cost and financial aid.¹⁸ Although no explicit weighting is included in the methodology, university culture and academic outcomes/quality are worth more while cost and financial aid are worth the least.¹⁹

Other Best for Vets references include enrollment; policy agreements (ED and VA’s Principles of Excellence, ED’s 8 Keys to Veterans’ Success, and Department of Defense’s Memorandum of Understanding); Yellow Ribbon participation; accreditation; staff support; retention rate; graduation rate; and default rate. Although *Military Times* recognizes some high-quality schools with excellent veteran resources, it also includes institutions under caution by VA without accounting for such. For example, Stratford University is ranked No. 94. See *Appendix, Figure 3*. VA’s Comparison Tool includes a caution flag for Stratford because it is operating under provisional accreditation, which raises serious concerns about the institution’s overall financial wellbeing.²⁰

Online College Plan’s “Top 20 Best 4-Year Colleges for Veterans”²¹ calculates its rankings by evaluating faculty to student ratio (13.75 percent); staff support (11 percent); academic support (11 percent); course completion (13.76 percent); retention of military students (13.76 percent); graduation of military students (13.76 percent); percent employed after six years (13.76 percent); and salary after six years rounded to the nearest \$1,000 (9.22 percent).²² A 50-point penalty may be assessed in several situations, including not supporting the 8 Keys to Veterans’ Success, not supporting the Principles of Excellence, and not supporting Memorandum of Understanding.

A bonus of 50 points may be assessed for ranking in *Military Times’* top five. *Online College Plan* ranks Ashford University as No. 16. See *Appendix, Figure 4*. This high ranking is questionable in light of VA placing a cautionary flag within its GI Bill Comparison tool because of a potential lapse in program approval and payment of GI Bill benefits.²³ Ashford also has received at least 30 complaints with a majority pertaining to recruiting/marketing practices and financial issues.²⁴

Guide to Online Schools’ “2017 Top Military-Friendly Online Colleges”²⁵ relies on the Military Advanced Education & Transition guide, which involves a survey of more than 400 institutions with a focus on four categories: military culture, online support, financial aid, and flexibility.²⁶ Military culture is in reference to the support offered to military students such as the level of training received by faculty and staff; online support evaluates whether the institution provides adequate

¹⁶ George R. Altman, *Best for Vets: Colleges 2017 – new rankings of 175 schools*, MILITARY TIMES, Nov. 1, 2016, <https://www.militarytimes.com/military-honor/salute-veterans/2016/11/01/best-for-vets-colleges-2017-new-rankings-of-175-schools/>.

¹⁷ George R. Altman, *Methodology Best for Vets: Colleges 2017*, MILITARY TIMES, Nov. 1, 2016, <https://www.militarytimes.com/military-honor/salute-veterans/2016/11/01/methodology-best-for-vets-colleges-2017/>.

¹⁸ *Id.*

¹⁹ *Id.*

²⁰ Veterans Affairs GI Bill Comparison Tool, Stratford University, <https://www.vets.gov/gi-bill-comparison-tool/search?name=stratford+university> (last visited Oct. 30, 2017).

²¹ Online College Plan, *Top 20 Best 4-Year Colleges for Veterans*, <https://www.onlinecollegeplan.com/4-year-colleges-veterans/> (last visited Oct. 24, 2017).

²² *Id.*

²³ Veterans Affairs GI Bill Comparison Tool, Ashford University-Online, <https://www.vets.gov/gi-bill-comparison-tool/profile/21007103-viewWarnings> (last visited Oct. 30, 2017).

²⁴ *Id.*

²⁵ Guide to Online Schools, *2017 Top Military-Friendly Online Colleges*, <https://www.guidetoonlineschools.com/online-schools/military-friendly> (last visited Oct. 24, 2017).

²⁶ Guide to Online Schools, *2017 Military-Friendly Online Colleges Methodology*, <https://www.guidetoonlineschools.com/online-schools/military-friendly/methodology> (last visited Oct. 30, 2017).

support to online students; financial aid considers whether military students can pay for their education through various tuition assistance benefits; and flexibility assesses a college's policies on course transfer, prior learning credit, leave, and withdrawal.²⁷ Grantham University, which was discussed earlier in this comment on pages 2 and 3, received a military-friendly score of 86.59 out of a possible 100. *See Appendix, Figure 5*. It is unclear whether this military-friendliness score is impacted by campus-wide concerns.

*Military Advanced Education & Transition's "Guide to Colleges & Universities 2017"*²⁸ evaluates institutions through its surveys on six basic factors: military culture, financial assistance, flexibility, general support, online support, and on-campus support.²⁹ Preparers of the guide explicitly state that, "We do not rank schools in the Guide, but we have recognized the schools that exhibited best practices in military and veteran education with an MAE&T 2017 Top School logo, for use in their promotional materials."³⁰ Colorado Technical University scored well on military culture (*see Appendix, Figure 6*), which is alarming in light of VA receiving almost 200 complaints about CTU and CTU being placed on Heightened Cash Monitoring.³¹

U.S. Veterans Magazine's "Top Veteran-Friendly Schools" does not provide its methodology, only saying "[t]he lists were compiled from market research, independent research, diversity conference participation and survey responses that were performed by DiversityComm's agents and/or affiliates."³² While it is difficult to assess this ranking without a description of methodology, the publication recognized The Art Institutes. *See Appendix, Figure 7*. In addition to cautionary flags from the VA, *Frontline* exposed problems with the Art Institutes in "Educating Sergeant Pantzke."³³

Although *Best College Reviews'* rankings do not offer a military-specific list, its approach and methods also deserve scrutiny. Best College Reviews evaluates flexibility (number of alternative delivery methods for a program or number of offerings at the institution); affordability (either considers the average out-of-state tuition or the program cost); online learning best practices (number of online learning enhancing instructional techniques employed); and academic reputation (general look at the institution's academic prestige).³⁴ The website's homepage is dominated by its Degree Finder. *See Appendix, Figure 8*.

However, unless an individual pays close attention one would likely miss the "Sponsored Schools" disclaimer at the bottom of the graphic. When inputting information about an art and design bachelor's degree with an emphasis on graphic design, Full Sail University is the suggested option. *See Appendix, Figure 8*. Users are then encouraged to include other details about themselves, including whether they are associated with the military. *See Appendix, Figure 8*. What these pages fail to acknowledge is that Full Sail has an annual average cost of \$35,654 yet the median salary of former students who received federal financial aid at 10 years after entering the institution is

²⁷ *Id.*

²⁸ Military Advanced Education & Transition, *Guide to Colleges & Universities 2017*, <http://mae.kmimediagroup.com/> (last visited Oct. 24, 2017).

²⁹ Military Advanced Education & Transition, *MAE&T 2017 Survey*, <https://www.mae-kmi.com/> (last visited Oct. 30, 2017).

³⁰ *Id.*

³¹ Veterans Affairs GI Bill Comparison Tool, Colorado Technical University - Online, <https://www.vets.gov/gi-bill-comparison-tool/profile/21809306-viewWarnings> (last visited Oct. 30, 2017).

³² U.S. Veterans Magazine, *Top Veteran-Friendly Schools*, <https://www.usveteransmagazine.com/recognition-lists/> (last visited October 24, 2017).

³³ PBS, *Educating Sergeant Pantzke*, FRONTLINE, June 28, 2011, <http://www.pbs.org/wgbh/pages/frontline/educating-sergeant-pantzke/>.

³⁴ Best College Reviews, *How Rankings Work at Best College Reviews*, <https://www.bestcollegereviews.org/how-rankings-work-at-best-college-reviews/> (last visited Nov. 3, 2017).

\$37,500.³⁵ Additionally, 24 percent of students pay down their debt as compared to the national average of 46 percent.³⁶

Rankings Based on Better Methodologies and Outcomes

Although SVA does not support institutional rankings based on military friendliness, certain existing rankings do a marginally better job of providing information about methodologies, as well as including student outcomes in the ranking determinations.

U.S. News & World Report's "Best Colleges for Veterans" involves positive practices. The baseline requirement for "Best Colleges for Veterans" inclusion is all such institutions are ranked in the 2018 edition of its "Best Colleges" rankings.³⁷ In addition, such schools must meet several other requirements, including being certified for the GI Bill; participate in the Yellow Ribbon Program or is a public school that charges in-state tuition to all out-of-state veterans; must enroll a minimum of 20 veterans and active servicemembers or a critical mass in the 2016-2017 academic year; and must be in the top half of its U.S. news ranking category.³⁸ Generally, in order for schools to use *U.S. News* content, written authorization must be provided and a fee may be associated with such use.³⁹

College Choice's "50 Best Colleges for Veterans for 2017"⁴⁰ evaluates accredited public and private institutions for quality (20 percent), reputation (20 percent), affordability (20 percent), value (20 percent), and satisfaction (20 percent). Quality considers different factors like graduation rate, admission statistics, and curriculum; reputation involves considering how the institution was ranked by other sources like *U.S. News & World Report*; affordability assesses net price, percentage of financial aid given, and average student loan size; value accounts for the return on investment; and satisfaction considers retention and individual student reviews on sites like RateMyProfessors.com.

Education Corner's "Top 100 – Best Colleges for Veterans"⁴¹ approach takes into account the following indicators: post-graduate student success (20 percent); retention/graduation rate (20 percent); reputation (15 percent); student satisfaction (15 percent); academic quality (10 percent); admissions selectivity (10 percent); and financial resources (10 percent).⁴² Education Corner proceeds to consider an institution's success in other rankings: *U.S. News & World Report* (30 percent); *Forbes Magazine* (20 percent); *Business Week* (15 percent); *Wall Street Journal* (15 percent); *Princeton Review* (10 percent); *Kiplinger* (5 percent); and *Washington Monthly* (5 percent).⁴³

³⁵ Department of Education College Scorecard, Full Sail University, <https://collegescorecard.ed.gov/school/?134237-Full-Sail-University> (last visited November 3, 2017).

³⁶ *Id.*

³⁷ Eric Brooks & Robert Morse, *Best Colleges for Veterans Methodology*, U.S. NEWS & WORLD REPORT, Sept. 11, 2017, <https://www.usnews.com/education/best-colleges/articles/best-colleges-for-veterans-methodology>.

³⁸ *Id.*

³⁹ U.S. NEWS & WORLD REPORT, Terms and Conditions – Copyright, <https://www.usnews.com/info/features/terms> (last visited Nov. 18, 2017).

⁴⁰ College Choice, *50 Best Colleges for Veterans for 2017*, <https://www.collegechoice.net/rankings/best-colleges-for-veterans/> (last visited Oct. 24, 2017).

⁴¹ Education Corner, *Top 100 – Best Colleges for Veterans*, <https://www.educationcorner.com/best-colleges-for-vets.html> (last visited Oct. 24, 2017).

⁴² Education Corner, "Composite" Ranking – The Most Accurate College Ranking Methodology, <https://www.educationcorner.com/college-rankings-methodology.html> (last visited Oct. 30, 2017).

⁴³ *Id.*

BestColleges.com's "America's Best Online Schools for Military"⁴⁴ utilizes a 100-point scale with academic quality (admissions rate, enrollment rates, retention rate, and six-year graduation rate) constituting 50 percent of the score; affordability (average net price, percentage of enrolled students taking out federal loans, and loan default rate) totaling 25 percent of the total; and online programming (number of online programs offered and percentage of enrolled students taking online courses) equaling 25 percent of the total score. While SVA recognizes *BestCollege.com*'s consideration of critical measures of academic quality like retention and six-year graduation rates, its sponsored advertisements are relatively prominent throughout its online materials.

Within the methodology, *BestColleges.com* explicitly states, "Sponsored school listings are separate, paid advertisements and are clearly marked with a 'SPONSORED' tag to distinguish them from editorially ranked schools. Our school rankings are editorially determined, independently vetted, and are not influenced by schools that pay for advertisements." However, *BestColleges* includes its featured schools above its ranked institutions. One featured school is Walden University. See *Appendix, Figure 9. VA's GI Bill Comparison Tool* clearly indicates that Walden University is operating under ED's Heightened Cash Monitoring.⁴⁵

Institutions Contribute to the Prevalence of These Rankings

Institutions play a part in supporting these rankings. Lead generators and list purveyors exert pressure on these institutions to participate in the pay-to-play schemes, and schools continue to crack under the pressure.

Saint Leo University, a private nonprofit college with a main campus location in Florida, aims to attract active duty servicemembers and veterans right from the first visit to its homepage. See *Appendix, Figure 10*. Once visitors click on the Military page, visitors will see a YouTube video entitled, "Saint Leo: One of the Most Military-Friendly Colleges." The video description proudly touts its success in these rankings. See *Appendix, Figure 11*.

Saint Leo is not the only school that attempts to capitalize on these rankings. Penn State World Campus, which is Penn State's online educational arm, dedicates an entire portion of its website to military-connected students. This portion of the website includes several of the rankings logos mentioned above. See *Appendix, Figure 12*. The University of Florida proudly proclaimed that it earned Victory Media's 2017 Military Friendly School status and declared, "First published in 2009, Military Friendly Schools is the most comprehensive, powerful resource for veterans today."⁴⁶

Schools should wholesale dismiss external "seals of approval." Instead, such institutions should focus on student outcomes. ED provides the College Scorecard and VA provides the GI Bill Comparison Tool, and both platforms are spearheading efforts to provide student outcome information. Instead of touting its Military Friendly School status, the University of Florida should highlight its 87 percent graduation rate⁴⁷ along with its 88.9 percent veteran retention rate and

⁴⁴ BestColleges.com, *America's Best Online Schools for Military*, <http://www.bestcolleges.com/features/top-military-friendly-colleges/> (last visited Oct. 24, 2017).

⁴⁵ Veterans Affairs GI Bill Comparison Tool, Walden University, <https://www.vets.gov/gi-bill-comparison-tool/profile/21013723-viewWarnings> (last visited Oct. 30, 2017).

⁴⁶ University of Florida News, *UF named to Victory Media's 2017 Military Friendly Schools*, Nov. 16, 2016, <http://news.ufl.edu/articles/2016/11/uf-named-to-victory-medias-2017-military-friendly-schools.php>.

⁴⁷ Department of Education College Scorecard, University of Florida, <https://collegescorecard.ed.gov/school/?134130-University-of-Florida> (last visited Nov. 8, 2017).

overall retention rate of 95.7 percent.⁴⁸ Actual student performance and outcomes are more transparent and of more value to students than “military friendly” monikers.

Institutions Need Not Be on These Lists to Attract Veterans

Servicemembers and veterans are extremely successful students. Since 2009, military-connected students earned 453,508 degrees and certificates using the Post-9/11 GI Bill.⁴⁹ In addition to 25 percent of these student veterans earning multiple certificates or degrees, student veterans earned at least 51,486 degrees in Science, Technology, Engineering, and Math.⁵⁰

Deciding on a school should occur at the most local level possible with individuals being empowered to execute the mission. Post-secondary education is a major life decision, not a trip to the supermarket.

Individuals should not make this life changing decision based on “military friendliness”. Important considerations include geographic proximity to home, family, and friends; size of the school; program strength; graduation rates; financial aid available, etc. Ultimately, a one size fits all approach does not work.

Instead of being focused on a military friendliness standard, students may access many objective and cost-free resources to help reach such a decision. ED’s College Scorecard was updated in September 2017 to enable users to compare up to 10 institutions. Additionally, VA’s GI Bill Comparison Tool allows users to evaluate how their benefits will be applied at different schools, as well as estimates of out-of-pocket expenses.

For students who prefer a list format, reputable rankings exist. *U.S. News & World Report* releases annual best colleges ranking.⁵¹ Indicators utilized to evaluate academic quality include graduation and first-year-student retention rates (22.5 percent); undergraduate academic reputation (22.5 percent); faculty resources (20 percent); student selectivity (12.5 percent); financial resources (10 percent); graduation rate performance (7.5 percent); and alumni giving rate (5 percent).⁵² The Princeton Review also prepares an annual best colleges list.⁵³ Princeton Review collected data from 137,000 total students at the 382 institutions; eighty questions could be divided into four categories (1) school’s academics/administration, (2) life at their college, (3) their fellow students, and (4) themselves.⁵⁴

College Factual, prepares a “Top Colleges for Veterans” list.⁵⁵ This ranking⁵⁶ evaluates 24 different factors that fall into the categories of veteran affordability, veteran population, veteran policies,

⁴⁸ Veterans Affairs GI Bill Comparison Tool, University of Florida, <https://www.vets.gov/gi-bill-comparison-tool/profile/11000510> (last visited Nov. 8, 2017).

⁴⁹ Student Veterans of America, National Veteran Education Success Tracker Fact Sheet, http://nvest.studentveterans.org/wp-content/uploads/2017/02/NVEST_Factsheets.pdf.

⁵⁰ *Id.*

⁵¹ U.S. News & World Report, *Best Colleges*, <https://www.usnews.com/best-colleges> (last visited October 27, 2017).

⁵² Robert Morse, Eric Brooks & Matt Mason, *How U.S. News Calculated the 2018 Best Colleges Rankings*, U.S. NEWS & WORLD REPORT, September 11, 2017, <https://www.usnews.com/education/best-colleges/articles/how-us-news-calculated-the-rankings>.

⁵³ The Princeton Review, *The Best 382 Colleges*, <https://www.princetonreview.com/college-rankings?rankings=best-382-colleges> (last visited October 27, 2017).

⁵⁴ The Princeton Review, *The Princeton Review’s College Ranking Methodology*, <https://www.princetonreview.com/college-rankings/ranking-methodology?ceid=best-colleges> (last visited October 27, 2017).

⁵⁵ College Factual, *Top Colleges for Veterans*, <https://www.collegefactual.com/rankings/veterans/> (last visited October 24, 2017).

⁵⁶ Josh McWilliam, *Best Colleges for Veterans Methodology*, COLLEGE FACTUAL, August 16, 2014, https://veterans.collegefactual.com/blog/best-colleges-for-veterans-methodology?_ga=2.192666274.945984446.1509138011-1230248036.1508262971.

veteran resources, veteran satisfaction, and overall college quality. An important consideration for veteran affordability is the percent of costs covered by full Post 9/11 GI Bill benefits for full-time in-state students; veteran population analysis emphasizes the number of GI Bill recipients at an institution; veteran policies highlight credit acceptance for military training; veterans resources evaluate whether an institution maintains a dedicated veterans office; veteran satisfaction considers GI Bill Feedback system complaints and whether the institution is on Heightened Cash Monitoring; the overall college quality takes the highest score between *College Factual's* "Best Colleges" and "Best Colleges for Returning Adults" rankings.

Ultimately, these lists and rankings are often justified by the claim they benefit students. However, student veterans are generally not selecting schools based on where the school falls in any given ranking. The emphasis must be placed on student outcomes and return on investment for a given degree and career path.

Simplifying these important determinations to a numbered ranking is a disservice to prospective students making this life-changing decision. The sheer number of websites we've found dedicated to attracting traffic and recruiting military-connected students should be a cause for alarm. We've permitted a cottage industry to operate unchecked that takes advantage of our nation's most precious asset, our military-connected students, for far too long.

We expect to work closely with the Commission on supporting military-connected students as they pursue their educations. Thank you for your consideration of this comment, and please have your team reach out if we can help clarify any of this work. For any questions, you may contact our Vice President of Government Affairs by email at will.hubbard@studentveterans.org or by phone at 202-223-4710.

Respectfully,



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|
Jared S. Lyon
President & CEO

APPENDIX

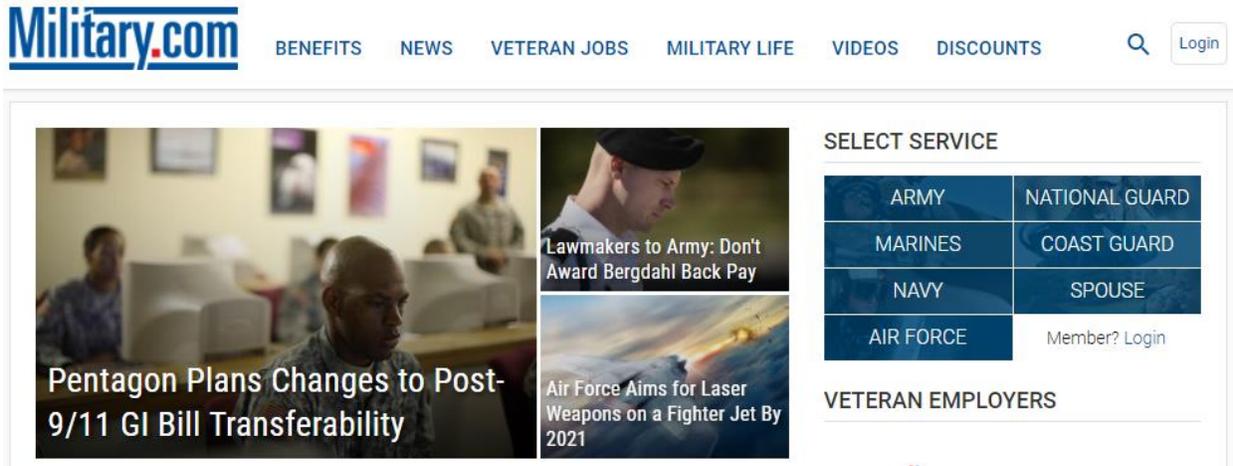


FIGURE 1. A screen capture of Military.com. The service-specific options on the right side of the page and the headings across the top make it seem as though this website is affiliated with the U.S. government.

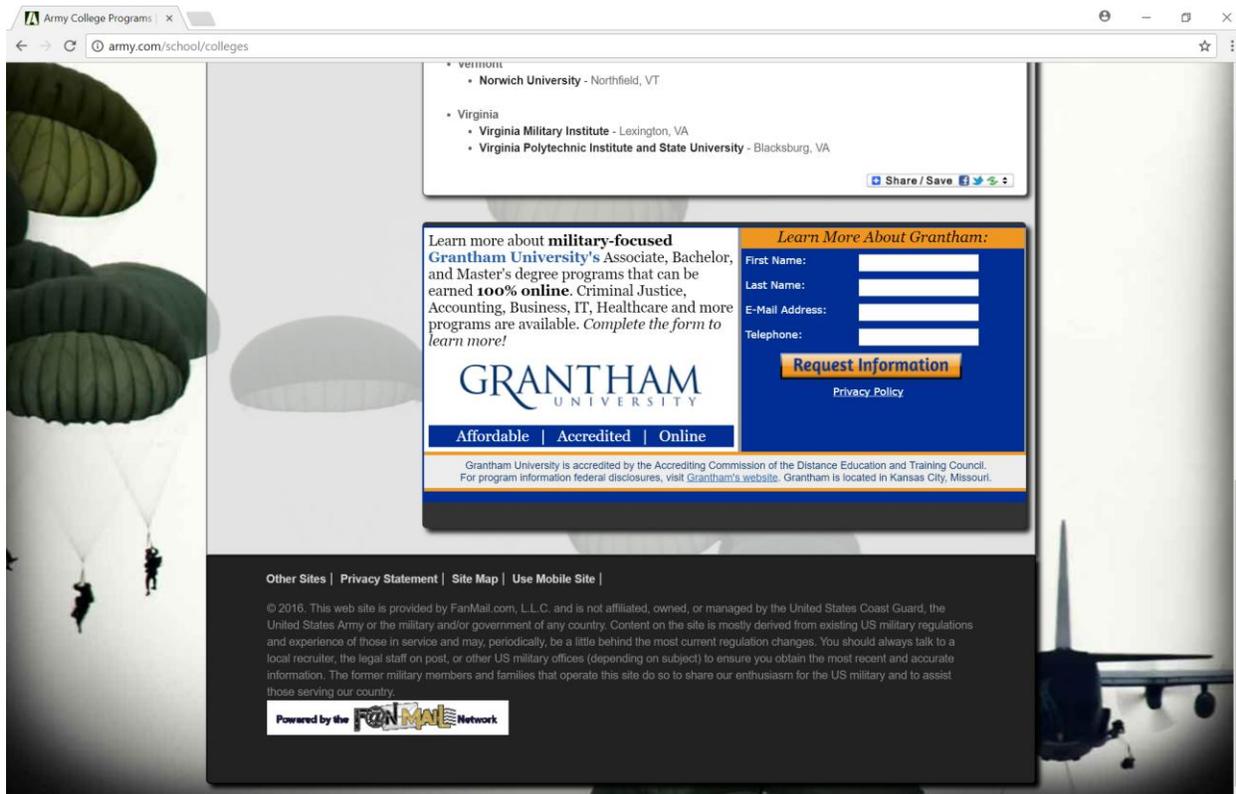


FIGURE 2. A screen capture of Army.com, which advertises schools that are “military focused” and by all appearances is a government website. The disclaimer reads, “This web site is provided by FanMail.com, L.L.C. and is not affiliated, owned, or managed by the United States Coast Guard, the United States Army or the military and/or government of any country.” Army.com is one of many websites that misleads servicemembers, veterans, and members of the public.

Rank	University	State	Type	Enrollment	Cost	Value	Value	Value	Value	Value	Value	Value	Value	Value	Value	Value	
91	University of Charleston	Charleston, W.Va.	Private	2,357	493	✓	✓	✓	✓	★★★★	All	★★★★	★	HLC [R]	15.1	\$6,776	61%
92	Central Michigan University	Mount Pleasant, Mich.	Public	25,526	1,187	✓	✓	✓	✓	✓	n/a	★★★★	★★★	HLC [R]	20.1	\$8,491	76% (35%)
93	St. Joseph's College	Brooklyn, N.Y.	Private	4,749	214	✓	✓	✓	✓	★★★★	Undergraduate	★★★	★★★	MSCHE [R]	11.1	no data	83% (67%)
94	Stratford University	Fairfax, Va.	For-profit	3,039	693	✓	✓	✓	✓	★★★★	All	★★★★	★★★	ACICS	5.1	\$4,106	55% (56%)
95	University of North Carolina at Pembroke	Pembroke, N.C.	Public	6,455	402	✓	✓	✓	✓	★★★★	All	★★★	★★★	SACS [R]	15.1	\$7,060	68% (24%)
96	University of Wisconsin-Stout	Menomonie, Wis.	Public	9,535	390	✓	✓	✓	✓	★★★★	Undergraduate	★★★★	★★★★	HLC [R]	20.1	\$7,528	76% (42%)
97	University of Illinois at Urbana-Champaign	Champaign, Ill.	Public	44,087	403	✓	✓	✓	✓	★★★★		★★★★	★★★★	HLC [R]	19.1	\$13,924	93% (88%)

FIGURE 3. A screen capture from the *Military Times* website. The for-profit Stratford University is wedged between a variety of public and private institutions.

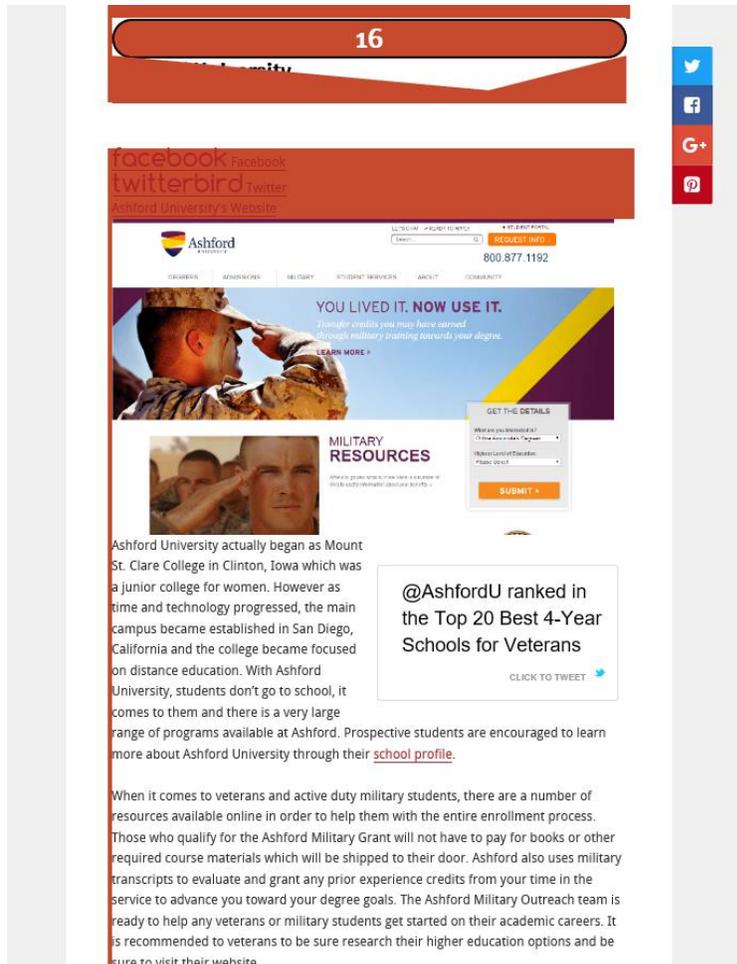


FIGURE 4. A screen capture from *Online College Plan's* website. Ashford University's marketing clearly focuses on attracting servicemembers and veterans.

Georgia Southern University	\$6,120	75.40
Granite State College	\$10,050	76.72
Grantham University	\$7,950	86.59
Idaho State University	\$21,024	80.40
Jacksonville University	\$14,550	78.48
Kaplan University	\$7,763	88.84
Keiser University eCampus	\$17,488	73.61

FIGURE 5. A screen capture from *Guide to Online Schools*. Clearly, prospective military-connected students could equate a high score with a better-quality education.

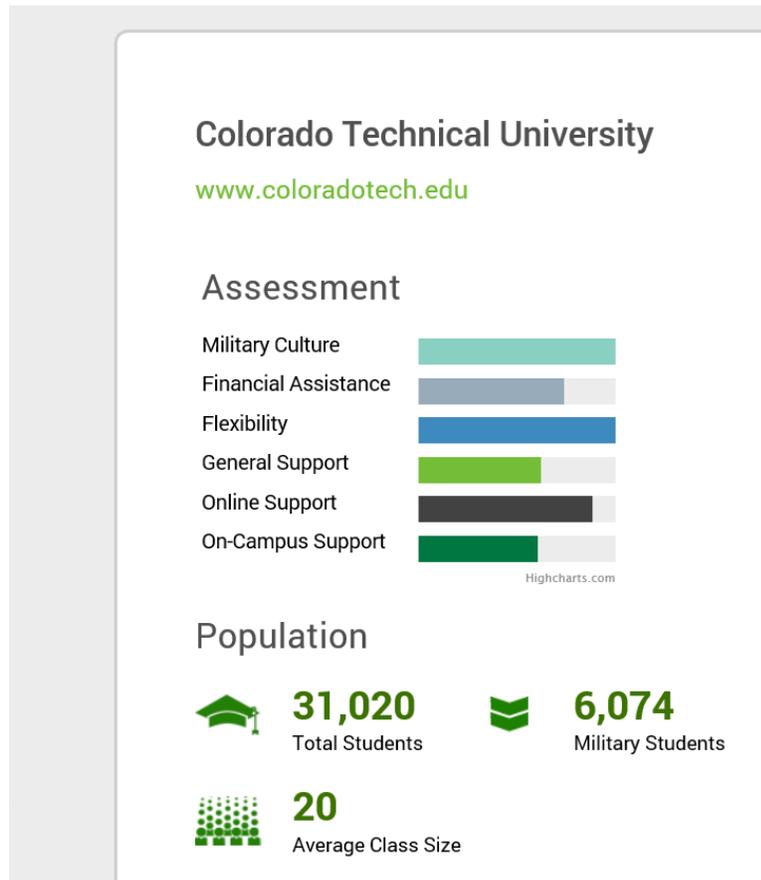


FIGURE 6. A screen capture from *Military Advanced Education & Transition*. The assessment category indicates that Colorado Technical University is a quality choice for a military connected student without disclosing potential concerns about the institution.

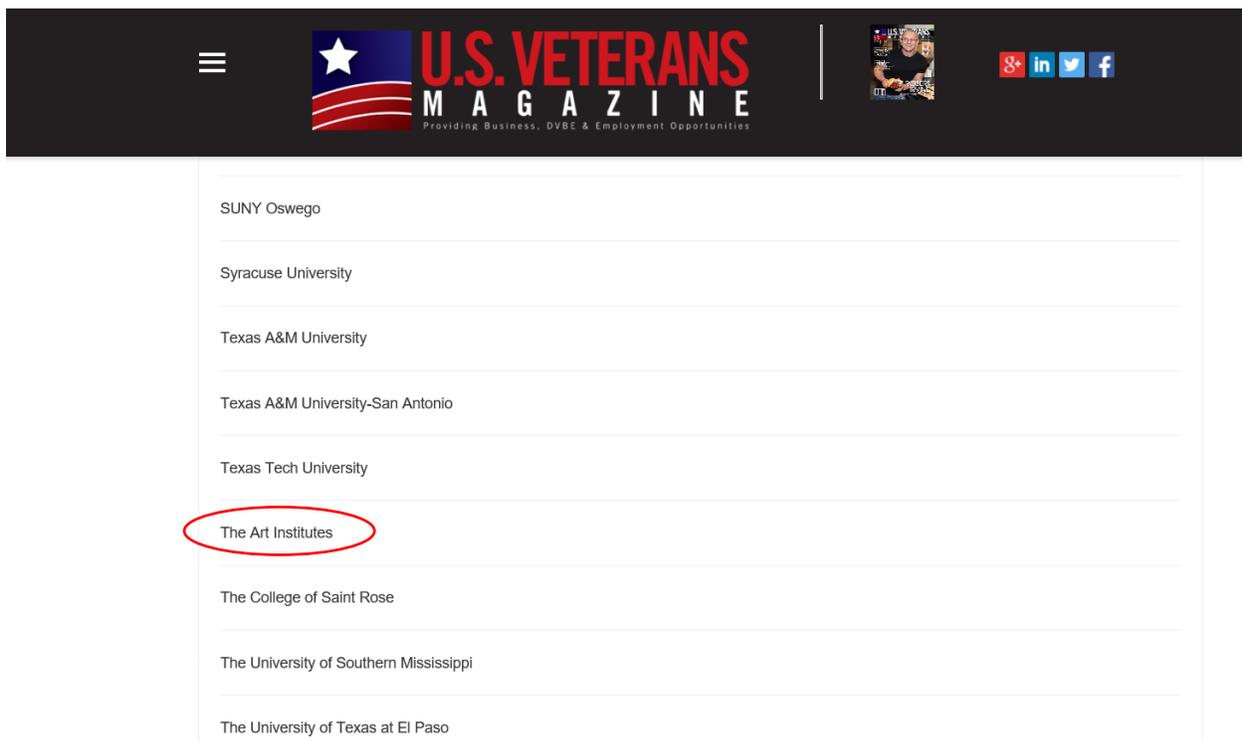


FIGURE 7. A screen capture from *U.S. Veterans Magazine's* website.

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* Select Your Age

-- Age --

* High School Graduation Year

-- High School Graduation Year --

* Select Highest Level of Education

-- Level of Education --

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E-mail Address

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Street Address

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FIGURE 8. Screen captures from *Best College Reviews*' website.

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As a GI Jobs Military Friendly® School since 2009, we provide tuition savings of up to 30 percent for U.S. service members, both full and part time, and the spouses of those on active duty. We also accept up to 90 credits toward undergraduate degrees and give credit for military training.

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Herzing University

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FIGURE 9. A screen capture from *BestColleges.com*. The “sponsored” disclaimer is in small text below the featured content.



FIGURE 10. A screen capture of the Saint Leo University website.

Military Friendly College x Saint Leo: One of the M... x

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2:03

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University of Notre Dame - Happy
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Saint Leo University
Published on Jun 15, 2010
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For nearly 40 years, Saint Leo University has been a leading provider of educational services to the U.S. military. Today, Saint Leo is ranked among the nation's most military-friendly colleges by G.I. Jobs and Military Advanced Education magazines.
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FIGURE 11. Once visitors click on the Military tab found in FIGURE 11, visitors will see a YouTube video entitled, “Saint Leo: One of the Most Military-Friendly Colleges.” Saint Leo legitimizes these rankings by referencing them in advertisements and promotions.



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We appreciate the sacrifices that our service members, veterans, and their

A Military-Friendly University

Our commitment to service members, veterans, and their families has been honored by prominent publications and organizations such as *U.S. News & World Report*; *Military Times*; *Military Friendly*; and *Military Advanced Education & Transition*.





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FIGURE 12. Screen captures of the Penn State World Campus website.