



March 5, 2014

U.S. Department of Education
Office of Management
Regulatory Information Management Services
400 Maryland Avenue, SW, LBJ 2W220
Washington, DC 20202-4536
ATTN: FOIA Public Liaison

Dear FOIA Public Liaison:

This is a request under the Freedom of Information Act.

I request that a copy of the following documents (or documents containing the following information) be provided to me (identify the documents or information as specifically as possible):

- (1) I would like to obtain data on the official Cohort Default Rate (CDR) of each postsecondary institution for the years 1987-1991. Currently, only 1992 and onward are available in "Archived Press Packages," on your website (<http://www.ifap.ed.gov/DefaultManagement/press/>). I believe that data from the earlier years must be available because the average CDRs for these years are shown in a graph on your website: (<https://www2.ed.gov/offices/OSFAP/defaultmanagement/defaultrates.html>).

I would like to obtain the school-level data for these early years (specifically, 1987, 1988, 1989, 1990, and 1991). I suspect that there may be earlier press packages containing Excel spreadsheets labeled something like: FY1991PressPackage.xls (or similar) for each earlier year. This would match the data we already have from 1992 forward.

If these data are not available electronically, paper copies of lists of schools and CDRs would suffice. Ideally, we need each school's id, name, address, type and control, and their 2-year cohort default rate (CDR) for each year.

- (2) I would like to obtain information on the schools that lost eligibility to disburse federal financial aid funds authorized under Title IV of the Higher Education Act (Title IV) because of violation of the CDR thresholds. In particular, I would like the annual data for the years 1987 to present of: lists of the schools that were subject to sanction, schools that appealed these sanctions, and the results of the appeals (i.e., which schools actually got sanctioned).
- (3) I would like to obtain lists of institutions that lost Title IV eligibility for the period of 1980-present, including information on the year eligibility was lost and the reason why. I would appreciate for the reason why each institution lost eligibility to be described in detail, at least at the level of the categories listed in the Congressional Research Report RL33909 (dated March 9, 2007 and available at <https://opencrs.com/document/RL33909/>). That report categorized reasons for loss of institutional eligibility into the following groups: Closed; Voluntary withdrawal; Loss of accreditation; Expired eligibility; Does not meet financial responsibility; Does not meet

administrative capability; Bankruptcy; Failed 90/10; Program Participation Agreement (PPA) revoked; No eligible program; Merged; Fraud; Does not meet requirements; Past performance issues; Significant program review findings; State licensure; Ownership change in process; and Other. The data in the paper was sourced as unpublished data from the U.S. Department of Education.

In order to help to determine my status to assess fees, you should know that I am (select one):

- ☐ An individual seeking information for personal use.
- ☒ Affiliated with an educational or noncommercial scientific institution, and this request is made for a scholarly purpose.
- ☐ Affiliated with a private corporation and seeking information for use in the company's business.
- ☐ A representative of the news media/press and this request is made as part of news gathering and not for commercial use.
- ☐ Affiliated with a public interest group and this request is not for commercial use.

The maximum dollar amount I am willing to pay for this request is \$25.00. Please notify me if the fees will exceed \$25.00 or the maximum dollar amount I entered.

☒ I request a waiver of all fees for this request. Disclosure of the requested information to me is in the public interest because it is likely to contribute significantly to public understanding of the operations or activities of the government and is not primarily in my commercial interest.

Specific explanation for waiver of fees (required if a waiver is requested):

Along with coauthors at the University of Maryland and University of Missouri, I am pursuing research on the behavior of sub-baccalaureate institutions. We are conducting a statistical study assessing whether the loss of federal student aid leads students to leave the for-profit sector in favor of public institutions. The paper will be published in a top economics journal and early versions will be made available to the public on our faculty websites. The question has important implications for current debates over the regulation of for-profit colleges. Thank you for considering my request!

Thank you for your consideration of this request.

Sincerely,



Stephanie Riegg Cellini
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