

Charlotte



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Memorandum

To: Colleen Nevin  
From: Sarah Angilello, Michael Page, Conor Kruger  
Date: June 15, 2020

Re: DeVry University – Borrowers Without Employment Prospects or Job Placement Rates  
Allegations Enrolled Between January 1, 2008 and September 30, 2015

DeVry University (“DeVry”) is a proprietary higher education institution, originally founded in 1931.<sup>1</sup> From 1988 until 2018, DeVry was owned and operated by DeVry, Inc. DeVry Inc. (which had changed its name to Adtalem Global Education in 2017<sup>2</sup>) sold DeVry University to Cogswell Education, LLC, its current owner, in 2018.<sup>3</sup>

The Borrower Defense Unit (“BDU”) has received thousands of applications from borrowers that attended DeVry. These applications contain allegations of misconduct occurring at DeVry campuses nationwide. Of all DeVry applications received, the earliest enrollment periods are as early as 1980, and the latest are as recent as 2020.<sup>4</sup>

As of the date of this memorandum, the BDU has received a substantial volume of evidence relevant to the borrower defense allegations at DeVry campuses nationwide and continues to review this evidence. This evidence in BDU’s possession relates to potential misrepresentations made by DeVry University regarding employment prospects, specifically job placement rates, for the period between January 1, 2008, and September 30, 2015. The BDU’s investigation of DeVry University’s representations regarding employment prospects alleging job placement for the period between January 1, 2008, and September 30, 2015, is ongoing.

The BDU has not received records regarding any state or federal investigations alleging misconduct, outside of representations regarding employment prospects alleging job placement, by DeVry, between January 1, 2008, and September 30, 2015 that would be relevant to the borrower defense applications of borrowers who enrolled during the stated time frame. Further, BDU is not in possession of evidence, from within the Department or through other sources, that would establish a pattern or practice, outside of potential employment prospects alleging job placement representations, by DeVry between January 1, 2008, and September 30, 2015.

Accordingly, because the BDU is not currently in possession of evidence that could substantiate allegations of misconduct, outside of employment prospects alleging job placement rate allegations, occurring between January 1, 2008, and September 30, 2015, we recommend that all DeVry University applications that do not make an employment prospects alleging job placement rate allegation with an enrollment date between January 1, 2008, and September 30, 2015, enrollment date be adjudicated in accordance with the standard review protocol.



<sup>1</sup> <https://www.devry.edu/about.html>

<sup>2</sup> <https://www.chicagobusiness.com/article/20170524/NEWS13/170529959/devry-education-group-changes-name-to-adtalem-global-education>

<sup>3</sup> Adtalem Global Education, Inc., Annual Report (Form 10-K), at 3 (June 30, 2018).

<sup>4</sup> See CEMS Reports generated by BDU personnel on 05/29/20 (on file with department).



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Keller Graduate School of Management

Entering Evidence Considered Manually:

1. Open a case with a suggested closing correspondence value of Standard Denial with Evidence Considered in status 3.10
2. In the “Evidence Considered” field on the case select the following:
  - a. Evidence obtained by the Department in conjunction with its regular oversight activities
3. The case is now ready to process following the normal borrower notification letter creation process.

Bulk Update Options:

1. Bulk update (by work ticket to Accenture) all Keller Graduate School of Management cases in 3.10 with the following:
  - a. In the “Evidence Considered” dropdown, select “Evidence obtained by the Department in conjunction with its regular oversight activities.”
2. Process following the normal borrower notification letter creation process.

