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February 3, 2020

The Honorable Betsy DeVos
Secretary
U.S. Department of Education
400 Maryland Avenue SW
Washington, DC 20500

Dear Secretary DeVos:

On December 12, 2019 you testified before the Committee on the Department of Education's (Department's) implementation of the Borrower Defense rule. A major subject of the hearing was the then-newly released formula to provide partial relief to borrowers with claims approved by the Department. This Administration's pursuit of a partial relief formula runs counter to both recommendations of career Department staff and the policies of the previous Administration, and we fear will result in defaulted borrowers continuing to be saddled with debt that predatory colleges mislead them into incurring based on the false promise that their education would be an investment in their future.

In late 2016 and early 2017, career staff advocated to grant full relief to defrauded borrowers who attended Corinthian Colleges (Corinthian or CCI) and ITT Technical Institute (ITT) on the basis of those colleges' deliberate and pervasive fraud.[1] The previous Administration heeded these recommendations as part of its comprehensive approach to adjudicate claims quickly and fairly, an approach that the Department's Office of the Inspector General (OIG) has investigated and found to be "properly documented," "consistently communicated," and "absent of errors."[2]

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[1] *NPR*, "Betsy DeVos Overruled Education Dept. Findings on Defrauded Student Borrowers," Corey Turner, December 11, 2019, https://www.npr.org/2019/12/11/786367598/betsy-devos-overruled-education-dept-findings-on-defrauded-student-borrowers.

[2] According to a 2017 report, the Department's Office of Inspector General (OIG) found that the Office of Federal Student Aid (FSA) had "established policies and procedures related to the intake and discharge of borrower defense claims in 2015 and refined the claims intake policies and procedures throughout our review period." The OIG identified weaknesses with some of FSA's procedures, but as FSA's response stated, "Despite these challenges, we are pleased to note that OIG did not identify any errors in the adjudicated claims, and that the review for each of the sampled claims was properly documented. In addition, OIG found that FSA created policies and procedures for borrower defense that have evolved over time as FSA has continued to refine its processes. While the Report notes

The Department under your leadership has taken a different approach, one I believe is exemplified by the release of the partial relief formula.

Two days before the December 12 hearing, the Department unveiled a partial relief formula and declared it to be "a scientifically robust statistical methodology to determine harm" and process claims.[3] However, Committee staff, members, and higher education experts quickly determined that the methodology underlying the formula is deeply flawed – it relies upon insufficient data and misuses statistical tests, and applies those tests in a way that appears to be inconsistent with the Department's stated policy. These flaws compound upon each other, resulting in a formula that makes it essentially impossible for cohorts of borrowers from Corinthian and ITT to ever qualify for full relief from their debt. This result is contrary to the recommendations of the Department's career staff and legal findings supported by numerous State Attorneys General.[4] In pursuing a policy that drastically limits the relief defrauded borrowers may receive, the Department seems to claim that these colleges provided value to the students they defrauded. In reality, many of these defrauded students are unable to find jobs in their field of study or transfer credits to other universities, despite the false guarantees made by their colleges. Many more are making the minimum wage despite earning a degree and assuming substantial debt along the way.[5]

You have previously stated that "no fraud is acceptable, and students deserve relief if the school they attended acted dishonestly."[6] But based on an analysis of the Department's new partial relief formula, many students may successfully prove their school acted dishonestly, but obtain no relief.

The 2019 partial relief formula incorrectly applies basic statistical concepts and makes unsupported assumptions.

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that these policies and procedures were not always reduced to writing in formal policy documents, the policies and procedures were consistently communicated and understood throughout the borrower defense program as demonstrated by the absence of errors identified by OIG." U.S. Department of Education, Office of Inspector General, *Federal Student Aid's Borrower to Defense to Repayment Loan Discharge Process*, ED-OIG/104R0003, December 8, 2017, https://www2.ed.gov/about/offices/list/oig/auditreports/fy2018/i04r0003.pdf.

[3] U.S. Department of Education, "Secretary DeVos Approves New Methodology for Providing Student Loan Relief to Borrower Defense Applicants," December 10, 2019, https://www.ed.gov/news/press-releases/secretary-devos-approves-new-methodology-providing-student-loan-relief-borrower-defense-applicants.

[4] *NPR*, "Betsy DeVos Overruled Education Dept. Findings on Defrauded Student Borrowers," https://www.npr.org/2019/12/11/786367598/betsy-devos-overruled-education-dept-findings-on-defrauded-student-borrowers; *Sweet v. DeVos*, U.S. District Court, Northern District of California, June 25, 2019, Case 5:19-cv-03674, available at https://predatorystudentlending.org/wp-content/uploads/2019/06/Complaint.pdf; and *Vara v. DeVos*, U.S. District Court for the District of Massachusetts, October 22, 2019, Case 1:19-cv-12175, available at https://predatorystudentlending.org/wp-content/uploads/2019/10/Vara-v-DeVos.pl-2019-10-22-14_47_49.pdf.

[5] Using 2014 Gainful Employment data for Corinthian and ITT, 28 programs had median annual earnings less than $14,500 (based on the federal minimum wage of $7.25 an hour, 40 hours a week for 50 weeks a year), available at https://studentaid.gov/data-center/school/ge.

[6] *New York Times*, "For Students Swindled by Predatory Colleges, Relief May Only be Partial," Erica Green, December 21, 2017, https://www.nytimes.com/2017/12/21/us/politics/for-profit-universities-debt-relief-devos.html.

In simple terms, the Department's new partial relief formula compares the median earnings of a program where a borrower is seeking relief, to the median earnings of borrowers who attended other, similar programs.[7] It uses standard deviation to determine if the earnings in the borrower's program are statistically different from the similar programs. This calculation is the sole determinant of whether the borrower experienced harm from the colleges' fraudulent activities and what amount of relief, if any, a borrower deserves.[8]

In order to qualify for full relief under the Department's partial relief formula, a borrower must show their program's earnings are so low that they are an outlier statistically when compared to programs offering similar degrees.[9] Statistically, if a data point lies two or more standard deviations away from the *average,* or mean, of the data set, this can indicate that the point is an o*utlier* and statically different from the rest of the data set. However, the Department's formula compares each data point of the median earnings in a borrower's program to the *median* of similar program earnings data using standard deviation. The choice of median instead of mean is statistically inappropriate and leads to demonstrably absurd results, results which appear to skew to the detriment of borrowers.[10]

According to the Department's calculations, the median annual earnings of borrowers in 58 Corinthian programs would need to be $0 or less for defrauded borrowers to receive full relief.[11] For example, if Corinthian defrauded a student, convincing him/her to attend Corinthian's plumbing program by falsely guaranteeing employment, the Department's formula categorically bars this student from full relief. The Department's methodology requires the median program earnings at a Corinthian Plumbing Technology/Plumbing diploma program to be at least two standard deviations away from median earnings in similar programs to receive full relief. In real terms, that means the median earnings for a borrower's program would have to be less than

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[7] The U.S. Department of Education's National Center for Education Statistics defines median earnings as the amount which divides the income distribution into two equal groups, half having income above that amount and half having income below that amount. Earnings include all wage and salary income. Unlike mean earnings, median earnings either do not change or change very little in response to extreme observations. See https://nces.ed.gov/programs/coe/glossary.asp#m.

[8] Specifically, the Department's Borrower Defense Relief Methodology Policy Statement states, "this new methodology would provide for tiers of relief, but those tiers would be based on the quartiles, with 100 percent relief being awarded to successful borrower defense applicants whose program's median earnings were at or lower than two standard deviations from the median earnings of graduates of similar programs at other schools. Successful BD applicants whose median program earnings are higher than two standard deviations below the median, but lower than the median of the comparison group will generally be awarded 25 percent, 50 percent, or 75 percent relief." U.S. Department of Education, *Policy Statement: Tiered relief methodology to adjudicate certain borrower defense claims*, December 10, 2019, https://www.ed.gov/sites/default/files/documents/borrower-defense-relief.pdf (p. 3).

[9] *Id.*

[10] Such a comparison is only be valid if the data are normally distributed. However, the earnings data the Department used to evaluate harm were not normally distributed. In fact, earnings data are virtually never normally distributed. For example, a small number of exceptionally high wage earners, the fact that earnings are truncated at zero, and the existence of the minimum wage, are all factors that cause the mean and the median to diverge.

[11] U.S. Department of Education, *Borrower Defense Partial Relief Methodology, Corinthian Colleges, Inc. (CCI) Programs, December 2019*, https://studentaid.gov/sites/default/files/borrower-defense-partial-relief-methodology-cci.pdf.

negative $14,700 for borrowers to receive full relief.[12] Given that no one can earn negative income, full relief under this program is impossible to achieve for a defrauded student.

Under the Department's formula, for 91 percent of Corinthian programs and 35 percent of ITT programs, borrowers working 40 hours a week would have to make less the federal minimum wage in order to be eligible for full relief.[13] Put differently, in over 9 out of 10 Corinthian programs, even if a student can prove their school perpetrated fraud, if more than half of that student's classmates earn minimum wage, the Department will categorically refuse to provide full relief to that student. Douglas Webber, a noted higher education economist and a bi-partisan witness before the Committee, commented on the statistical choices made by the Department, saying, "[p]erhaps most concerning is the lack of rigor or thought put into a formula that will help shape the financial well-being of students who have already been materially wronged."[14]

The Department's use of data sets from the Gainful Employment rule and the College Scorecard as basis for its partial relief formula calculation has serious limitations.

According to the Department's Borrower Defense Relief Methodology Policy Statement (Policy Statement), the Department uses data from the publicly available Gainful Employment data set from 2014 for determining earnings data of graduates, and in turn to establish the level of harm for Corinthian and ITT borrowers.[15] This is fundamentally problematic. Relying on data on graduates of a program to measure the value of a Corinthian and ITT education fails to recognize that the majority of students that attended those colleges never graduated.[16] Many (if not most) of the borrowers harmed by the fraudulent practices of ITT and Corinthian did not complete their programs. Yet, the data being used to determine if their harm rises to the level to receive full relief does not reflect that reality. The data set is essentially incomplete and relying solely on

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[12] According to the ED's calculations the Median Program Earnings for a non-Corinthian Diploma Program in "Plumbing Technology/Plumber" is $19,912 and two standard deviations is $34,627. ED only provides full relief to programs whose median earnings fall two standard deviations below the median of all other programs. In this example, two standard deviations away from the median of all other programs is -$14,715. See *Borrower Defense Partial Relief Methodology, Corinthian Colleges, Inc. (CCI) Programs, December 2019,* https://studentaid.gov/sites/default/files/borrower-defense-partial-relief-methodology-cci.pdf.

[13] This analysis is based on the Corinthian and ITT charts published by the Department and does not include programs with no comparison earnings data. It assumes borrowers earning a minimum wage of $7.25 an hour, 40 hours a week for 50 weeks a year. *Center for American Progress*, "Betsy DeVos' Cruel Math Denies Relief to Defrauded Borrowers," Ben Miller, December 18, 2019, https://www.americanprogress.org/issues/education-postsecondary/news/2019/12/18/478876/betsy-devos-cruel-math-denies-relief-defrauded-borrowers/.

[14] *Medium*, "Education Expert: DeVos' New Borrower Defense Scheme is Nonsensical," Douglas Webber, December 12, 2019, https://medium.com/@repmarktakano/education-expert-devos-new-borrower-defense-scheme-is-nonsensical-b232a096c1a2

[15] U.S. Department of Education, *Policy Statement: Tiered relief methodology to adjudicate certain borrower defense claims.* https://www.ed.gov/sites/default/files/documents/borrower-defense-relief.pdf.

[16] According to a Senate report, over 50 percent of Corinthian and ITT students withdrew from those institutions in the 2008-09 school year. Because these colleges have closed and no longer report data to the Department of Education, this is the most recent data that remains publicly available. U.S. Senate Committee on Health, Education, Labor and Pensions, *For Profit Higher Education: The Failure to Safeguard the Federal Investment and Ensure Student Success,* Appendix: 15: Retention and Withdrawal, pg. A15-2 and A15-3, https://www.help.senate.gov/imo/media/for_profit_report/Appendixes/Appendix15.pdf.

data from program graduates likely skews the earnings data upward, again compounding problems with the formula.

The Department's Policy Statement claims that "using program-level earnings…provides an objective look at the harm and lack of value to be derived from a specific program caused by a pattern of misconduct by a school." However, for Corinthian and ITT students, the Department only uses one year (2014) of Gainful Employment data. It is difficult to see how the Department can deduce a pattern from one year of data. Given that Corinthian's fraud spanned years if not decades and borrower claims date back to misconduct as early as the 1990s,[17] 2014 data alone are insufficient to make relevant comparisons. In fact, according to the Department's Corinthian and ITT Partial Relief charts,[18] 90 Corinthian and 3 ITT programs have no earnings data available. It is unclear how the Department plans to accurately determine the level of harm these students suffered and consequently the amount of relief they are entitled to by relying on a solitary, incomplete dataset that doesn't reflect the characteristics of the cohort of students seeking relief.

College Scorecard data, which the Department will use for programs that are still operational, is not much better. According to the Department, College Scorecard data only capture earnings for 20 percent of programs.[19] Granted, the data covers 80 percent of students; however, because the calculations underlying the formula are based on programmatic information, missing four-fifths of college programs is a considerable limitation. Further, the College Scorecard data only include one year of data. For the same reasons described in the prior paragraph, one year of data is an insufficient reference in many of these cases.

The Department's Policy Statement and other partial relief documentation lack support and transparency.

As part of the rollout of the partial relief formula, on December 10, the Department published a Policy Statement[20] describing the formula which included two charts[21] demonstrating the partial

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[17] U.S. Department of Education, Recommendation for Everest/WyoTech Borrowers Alleging Transfer of Credit Claims, October 24, 2016, p. 4 ("1998: "I attended the school due to the flexible hours and the fact that I was told by the [the school] that my credits in fact would transfer over to other schools.""), https://apps.npr.org/documents/document.html?id=6572884-10-24-2016-Memo.

[18] U.S. Department of Education, *Borrower Defense Partial Relief Methodology, Corinthian Colleges, Inc. (CCI) Programs, December 2019*, https://studentaid.gov/sites/default/files/borrower-defense-partial-relief-methodology-cci.pdf and U.S. Department of Education, *Borrower Defense Partial Relief Methodology, ITT Educational Services, Inc. Programs, December 2019*, https://studentaid.gov/sites/default/files/borrower-defense-partial-relief-methodology-itt.pdf.

[19] According to College Scorecard earnings data on the Department's website (see "Most Recent Data by Field of Study") there are 216,638 programs in the dataset, of which 171,267 (or 79 percent) have privacy suppressed earnings data and therefore no earnings data available for use, https://collegescorecard.ed.gov/data/.

[20] U.S. Department of Education, *Policy Statement: Tiered relief methodology to adjudicate certain borrower defense claims,* https://www.ed.gov/sites/default/files/documents/borrower-defense-relief.pdf.

[21] The Department revised these charts on December 13, 2019. The information used in this section is consistent across the charts published on December 10, 2019 (see Exhibit 1) and those published on December 13, 2013, U.S. Department of Education, *Borrower Defense Partial Relief Methodology, Corinthian Colleges, Inc. (CCI) Programs, December 2019*, https://studentaid.gov/sites/default/files/borrower-defense-partial-relief-methodology-

relief formula as applied to Corinthian and ITT programs. Using the methodology specified by the Department in the Policy Statement and the publicly available data it claims to rely upon, Committee staff are unable to reproduce some of the results listed in the charts. Review of these documents raises several questions about the Department's approach that require additional explanation.

As described above, for Corinthian and ITT the Department used publicly available 2014 Gainful Employment data to establish both a borrower defense applicant's program earnings and the earnings for the comparison group. In practice, however, we found instances where the Department's published charts and the publicly available 2014 Gainful Employment data do not align. For example, the Corinthian chart lists the median program earnings for bachelor's degrees in "Accounting" and "Accounting and Business/Management" as $22,726.50.[22] However, that value is found nowhere in the gainful employment data set.[23] If the Department was strictly applying the methodology described in its Policy Statement, this would be impossible. As a result, it is unclear how that number was calculated.

It is also unclear how the Department calculated the values for the "Median Comparison Earnings (Non-CCI Programs)" in the published Corinthian partial relief charts. For example, using the 2014 Gainful Employment data for non-CCI programs, the median of the median earnings for a diploma in "Accounting" is $23,103.[24] However, the Partial Relief chart lists the median comparison earnings for that program to be $19,966. The median comparison earnings between ITT and Corinthian also differ. While we can speculate about why it might be the case, a clearer explanation of how the comparison groups were derived is warranted.

Finally, the Policy Statement states, "earnings would be imputed to a borrower and to a comparison group based on the median earnings of graduates of the program in which the applicant was enrolled or median earnings of graduates of similar programs." However, the documentation fails to outline how the Department defined and identified "similar" programs, what steps it will take when data on median earnings is not available (as is the case for 80 percent of programs), and how many programs were missing median earnings data altogether.

The inconsistencies between the Policy Statement and the published charts should compel the Department to publish the raw data and full calculations used to determine the median program earnings, the comparison data, and the standard deviations. The importance of this formula for hundreds of thousands of borrowers demands the Department be as transparent as possible and provide comprehensive data and methodology information to the public. It is essential that the

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cci.pdf and U.S. Department of Education, *Borrower Defense Partial Relief Methodology, ITT Educational Services, Inc. Programs, December 2019*, https://studentaid.gov/sites/default/files/borrower-defense-partial-relief-methodology-itt.pdf.

[22] U.S. Department of Education, *Borrower Defense Partial Relief Methodology, Corinthian Colleges, Inc. (CCI) Programs, December 2019*, https://studentaid.gov/sites/default/files/borrower-defense-partial-relief-methodology-cci.pdf.

[23] U.S. Department of Education, *Gainful Employment Earnings data*, https://studentaid.gov/data-center/school/ge?src=press-release.

[24] *Id.*

public understand how the Department selects comparison programs, because comparing the outcomes at one predatory program to other predatory programs will inherently make all predatory schools look better.

The 2019 published Partial Relief formula and supporting documentation was inexplicably changed after Secretary DeVos' December 12 testimony.

After the Department faced criticism regarding the negative earnings threshold its formula required for many programs to see full relief in the hearing, the Department revised the formula's presentation less than 24 hours after the hearing, without announcement or warning. The Department pulled down Corinthian- and ITT-specific charts that had been published earlier in the week and posted updated versions with additional data elements. The updated charts included a new formula to calculate a so-called "relief score" used to determine the level of relief for each program. The levels of relief first publicized on December 10 and the revised documentation posted on December 13, however, include identical outcomes (and identical values for key variables: median program earnings, median comparison earnings, and standard deviations). The version of the methodology that uses a "relief score" however, is only available in the revised charts posted the day after the hearing.[25] It is not in the Department's press release, Policy Statement, or any other materials released by the Department. The Department's additional documentation added after the hearing does not resolve the problems with the underlying relief methodology or change any outcomes for defrauded borrowers, but instead makes it more difficult to immediately identify many of the problems with the formula that were more obvious originally.

Fundamentally, we have several outstanding questions regarding the substance of and calculations supporting the Department's new partial relief formula. Additionally, I have concerns that the data sets the formula uses as the basis for determining harm are significantly limited. It is important to resolve these questions so we can determine if the results of the formula that Committee staff and higher education experts have identified are flaws in the system that can be addressed or fundamental features of the product. I remain hopeful that the Department will recognize that a formula that bars borrowers that attended 15 ITT programs from any chance of receiving relief, irrespective of the actual fraud that occurred, is flawed and in need of revisions. A formula that tells borrowers from 83 Corinthian programs they will only see 10 percent of their loans forgiven and 56 other programs will receive less than 50 percent, needs revision.[26] A formula that results in borrowers from only 3 Corinthian programs receiving

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[25] U.S. Department of Education, *Borrower Defense Partial Relief Methodology, Corinthian Colleges, Inc. (CCI) Programs, December 2019*, https://studentaid.gov/sites/default/files/borrower-defense-partial-relief-methodology-cci.pdf and U.S. Department of Education, *Borrower Defense Partial Relief Methodology, ITT Educational Services, Inc. Programs, December 2019*, https://studentaid.gov/sites/default/files/borrower-defense-partial-relief-methodology-itt.pdf. For versions of the relief charts published on December 10, see Exhibit 1.

[26] Based on the "% Relief" column in the ITT and Corinthian Charts. See U.S. Department of Education, *Borrower Defense Partial Relief Methodology, Corinthian Colleges, Inc. (CCI) Programs, December 2019*, https://studentaid.gov/sites/default/files/borrower-defense-partial-relief-methodology-cci.pdf and U.S. Department of Education, *Borrower Defense Partial Relief Methodology, ITT Educational Services, Inc. Programs, December 2019*, https://studentaid.gov/sites/default/files/borrower-defense-partial-relief-methodology-itt.pdf.

full forgiveness needs revision.[27] A formula that produces these results is neither fair nor defensible. I hope that through ongoing dialogue we can come to understand more of the methodology used to derive this formula and we can work together to make sure students receive relief if the school they attended acted dishonestly.

In the interim, the Committee, as part of its oversight responsibility, requests the following documentation and responses by February 17, 2020:

1. Documentation of the partial relief "Options" memo signed by the Secretary on November 12, 2019.

2. Documentation of all memos or draft memos presenting options for the partial relief formula to the Undersecretary or Secretary and the underlying analysis.

3. Documentation of the Department's consideration of a) overall cost, b) approval rate, or c) percentage of borrowers within each tier of relief, in the development of the 2019 partial relief formula.

4. Documentation of Department cost estimates associated with each of the partial relief options presented to the Secretary.

5. Documentation of any Department cost estimates comparing the 2017 partial relief formula and the 2019 formula.

6. Who at the Department (individuals and offices) was responsible for developing the partial relief formula?

    a. Please specifically list any persons or offices with expert knowledge of statistical methods who provided feedback or technical assistance.

    b. Please provide documentation of that feedback or technical assistance.

    c. What process did the Department undertake to develop and refine the formula?

7. Documentation of Institute for Education Science and/or National Center for Education Statistics approval of the partial relief methodology.

8. Explanation as to why the Department shifted from using average earnings data to median. Specifically, the policy statement dated December 10, 2019, stated, "The [2017] methodology…was 'rooted in a determination of the value of the claimant's CCI education, as calculated by comparing average earnings of CCI claimants who attended a given academic program to those who attended similar programs…'"

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[27] *Id.*

9. Explanation of why the Department chose to base the partial relief formula on the number of standard deviations from the median, instead of the mean, when standard deviation is unrelated to the median of a non-normal distribution such as earnings.

10. Documentation on how the Department plans to determine relief for programs that lack earnings data and how many Borrower Defense applicants are in programs that lack such data.

11. Documentation of the Department's process for soliciting and examining other evidence for relief. Given that the Policy Statement indicated that "the majority of borrower defense applicants have not provided the Department with evidence of or supporting the scope of their harm to support their claims, likely because the Department did not require such evidence when they applied… Accordingly, the Department has examined other evidence in its possession to assess the relief to be provided to borrowers."

12. All communications from December 9 through December 16 about the partial relief (or "tiered relief") formula to include: Secretary Betsy DeVos, Undersecretary Diane Auer Joes, Mark Brown, staff within the Institute for Education Sciences and National Center for Education Statistics, and other Department staff empowered to make a final decision on partial relief methodology.

13. Regarding the Corinthian and ITT charts published in December 2019, please provide:

    a. The calculations and raw data used to create the comparison groups and the median program earnings;

    b. Statistical means for all the programs and comparison groups listed in the charts;

    c. The number of programs used in each comparison group, and documentation of how the Department determined the appropriate number and type of programs to include;

    d. The number of Borrower Defense claimants included in the groups; and,

    e. An explanation of the differences in the charts produced on December 10 and December 13 and why the charts were updated on December 13.

14. Documentation of the development of the "relief score" used in the December 13 Corinthian and ITT charts.

15. Documentation showing how the Department intends to address the earnings nexus to the requested relief. (The Policy Statement states, "earnings would be imputed to a borrower and to a comparison group based on the median earnings of graduates of the program in which the applicant was enrolled or median earnings of graduates of similar programs."

However, the documentation fails to outline 1) how many programs were missing median earnings and 2) how the Department defined and identified "similar" programs.)

16. Documentation (e.g. memos) developed by the Borrower Defense Unit to support adjudication of claims from non-Corinthian and non-ITT institutions.

We would also like the Department to brief Committee staff on these issues no later than February 17, 2020. Please coordinate the requested briefing and provide the requested documents and responses to Benjamin Sinoff at Benjamin.Sinoff@mail.house.gov. Please direct all official correspondence to the Committee's Chief Clerk at Tylease.Fitzgerald@mail.house.gov.

Sincerely,

ROBERT C. "BOBBY" SCOTT
Chair

LORI TRAHAN
Member of Congress

(Enclosure)

Exhibit 1: U.S. Department of Education, *Borrower Defense Partial Relief Methodology, Corinthian Colleges, Inc. (CCI) Programs, December 2019* and *Borrower Defense Partial Relief Methodology, ITT Educational Services, Inc. Programs, December 2019*; published December 10, 2019 and no longer publicly available.

Cc: The Honorable Virginia Foxx, Ranking Member