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PROGRAM REVIEW REPORT
PRCN 200340922254
University of Phoenix, OPEID 020988 00
Site Visit of 8/18/2003 – 8/22/2003

PROGRAM REVIEW REPORT / PRCN 200340822254
University of Phoenix, Phoenix, Arizona
Program Review, 8/18/2003 – 8/22/2003

TABLE OF CONTENTS

1	INSTITUTIONAL REVIEW DATA SHEET	2
2	BACKGROUND	5
2.1	Entity	5
2.2	Programs	5
2.3	Admission Standards	5
2.4	Growth of Enrollments & Revenues	6
3	SCOPE OF REVIEW	6
4	DISCLAIMER	7
5	FINDINGS AND REQUIREMENTS	7
5.1	Recruiter Compensation System	7
5.1.1	When Hiring Recruiters, UOP Promises Substantial Compensation	7
5.1.2	UOP Student Recruiting System – Focus on the Numbers	8
5.1.2.1	Sales Training – “Smoke & Mirrors”	8
5.1.2.2	Tracking Commissionable Sales and Sales Performance	11
5.1.2.3	UOP’s Aggressive Sales Motivation System	12
5.1.2.4	Intimidation Techniques	15
5.1.3	Recruiter Evaluation System Reinforces & Ranks the Quantitative	17
5.1.4	Salaries Actually Based on Quantity of Recruiting Activities	20
5.2	Bonus Incentives Awarded on Basis of Success in Securing Enrollments and Quantity of Recruiting Activities	22
5.2.1	Sperling Club Trip Awards	22
5.2.2	Prizes, Gifts and Bonuses	23
5.3	Ramifications / Results of System in Practice	24
5.3.1	Pressure to Enroll Unqualified Students	24
5.3.2	Focus on Obtaining Credit for Enrollment, Not Completing Education	24
5.3.3	Intense use of TitleIV Funds as Sales Tool / Culture of Duplicity	25
5.4	Conclusion: UOP Violated Incentive Compensation Prohibitions and Breached its Fiduciary Duty	25
5.4.1	Deceptive Practices to Mislead Department	25
5.4.2	Cover Up During Review	26
6	REFERENCES	27
7	REQUIREMENTS	30

Appendix A: List of Recruiters Identified in Report

Appendix B: List of Employees for Whom Personnel Records are to be Provided

Program Review Report, PRCN 200340922254
University of Phoenix, Phoenix, Arizona
Page 2

1 INSTITUTIONAL REVIEW DATA SHEET

Institutional Data					
OPE ID#	020888 00				
EIN:	860344364				
DUNS:	(b)(2)				
PPA	Full Certification, Expiration Date: June 30, 2007				
TYPE AND CONTROL:	Proprietary For-Profit				
ACCREDITATION:	North Central Association of Colleges & Schools				
Cohort Default Rates	1999 - 4.6%	2000 - 5.2%	2001 - 5.8%		
University of Phoenix - Advance System of Payment					
Title IV Program	FY 1999	FY 2000	FY 2001	FY 2002	FY 2003
Federal Pell Grant	11,129,538	10,178,395	28,394,739	< 51,322,322	82,215,846
Federal Direct Loan Programs	0	0	0	0	0
Federal Family Educational Loans	327,196,185	369,067,501	486,925,511	758,572,984	804,578,572
SEOG	0	0	21,200	1,778,584	1,230,889
Perkins Loan	0	0	40,000	759,000	642,000
FWS	0	0	0	0	0
Total	338,325,723	379,245,896	515,381,450	812,430,890	888,667,107
Program Review Data					
DATES OF REVIEW:	August 18 - 22, 2003				
ED REVIEWERS	Donna Wittman, Martina Fernandez-Rosario and Shane Dunne, Southwest Case Management Team, Susan Crim, Kansas City Case Management Team				
SCOPE OF REVIEW:	Fiscal Records / Enrollment Counselor Compensation Documentation, August 1, 1998 through August 22, 2003				
Corporate Institutional Officials Interviewed					
(b)(6)	(b)(6)				
Phoenix Campus Officials Interviewed					
(b)(6)	(b)(6)				

(b)(6)	(b)(6)
On-Line Campus Officials interviewed on Site	
(b)(6)	(b)(6)
San Jose Campus Officials interviewed on Site	
(b)(6)	(b)(6)
San Francisco Campus Officials interviewed on Site	
(b)(6)	(b)(6)

San Mateo Campus Officials Interviewed on Site	
(b)(6)	(b)(6)
Livermore Campus Officials Interviewed on Site	
(b)(6)	(b)(6)
Oakland Campus Officials Interviewed on Site	
(b)(6)	(b)(6)

The reviewers also interviewed former UOP employees off site as well as additional current employees who do not want their identities revealed for fear of losing their jobs.

L INTRODUCTION

Section 487(a)(20) of Title IV of the Higher Education Act of 1985, as amended (HEA), 20 U.S.C. §1094(a)(20), prohibits the payment of any commission, bonus or other incentive payment based directly or indirectly on success in securing enrollments.

2 BACKGROUND

2.1 Entity

The University of Phoenix (UOP) was established in 1978 by John Sperling to provide higher education to working adults. In 1981, Mr. Sperling incorporated Apollo Group, Inc. (Apollo), now the parent corporation of The University of Phoenix, Inc. Apollo Group, Inc. operates through its subsidiaries, The University of Phoenix; Institute for Professional Development; The College for Financial Planning Institute Corporation; and Western International University, Inc. As of August 31, 2002, UOP operated at 176 locations in 37 states, Puerto Rico and Canada. In its 2002 Annual Report, Apollo boasted that it was the largest private provider of higher education in the United States. Id.

In the early 1990s, UOP issued an initial public offering (IPO). Its debut on the public stock market yielded an infusion of over \$34 million in December 1994, and Apollo doubling its total enrollments between 1998 and 2002. Its growth fueled its stock price, resulting in a share of stock – priced at \$0.72 at its initial public offering (adjusted for stock splits) – selling at \$63.38 by the close of its 2003 fiscal year, August 31, 2003.

In October 2000, Apollo issued another class of stock to track the economic performance of its online division. University of Phoenix Online (UOPX). UOPX stock initially selling at \$6.98 per share, sold for \$64.50 per share as of the close of the 2003 fiscal year.

2.2 Programs

UOP offers degree programs and related areas of specialization, including Associate of Arts in General Studies, Bachelor of Science in Business, Bachelor of Science in Criminal Justice Administration, Bachelor of Science in Human Services, Bachelor of Science in Health Care Services and Bachelor of Science in Information Technology. UOP also offers Master of Arts in Education, Organizational Management, Business Administration, Counseling and Nursing. It also offers continuing education for teachers, custom training for corporations and various certificate programs.

In 1993, UOP began offering distance education (On Line programs) and in 2001, UOP was admitted to the Department's Distance Education Demonstration Program as part of the second cohort of participants. UOP refers to its on line operation as the On Line Campus. The On Line Campus operation is located in Phoenix, Arizona.

2.3 Admission Standards.

Historically, UOP required students to be 23 years of age and have at least two years of practical work experience and described its mission as the provision of "current, real-world education" to working adults. As of approximately two years ago, however, UOP lowered the age requirement to 21 and eliminated the work experience requirement.

2.4 Growth of Enrollments & Revenues

Apollo's total degreed enrollments in 1991 of 17,571 grew to 200,100 in 2003. Revenues grew correspondingly, from \$69 million in 1991 to \$1.3 billion in 2003. The On Line operation, UOPX, began slowly in 1993, but began mushrooming in 2000. On Line students numbered only 1,114 in 1993, but grew to 79,400 by 2003. The following chart depicts the enrollment, revenues and stock price history of both Apollo (APOL) and the On Line tracking stock, UOPX:

Year	Total Deg. Students	On Line Students	Net Revenue	APOL Stock \$*	UOPX Stock \$
1991	17,571		\$ 68,782,000		
1992	21,163		\$ 81,865,000		
1993	24,987	1,114	\$ 97,545,000		
1994	30,200	1,800	\$ 12,472,000	\$ 0.72	
1995	36,848	2,400	\$ 163,429,000	\$ 2.63	
1996	46,935	3,700	\$ 214,275,000	\$ 7.56	
1997	57,382	4,660	\$ 279,195,000	\$ 10.57	
1998	71,400	7,200	\$ 384,877,000	\$ 15.22	
1999	88,800	10,700	\$ 498,846,000	\$ 9.75	
2000	100,900	16,000	\$ 609,997,000	\$ 18.14	\$ 8.98
2001	124,800	29,200	\$ 769,474,000	\$ 26.25	\$ 21.00
2002	157,800	48,900	\$ 1,009,455,000	\$ 41.83	\$ 28.78
2003	200,100	79,400	\$ 1,340,000,000	\$ 63.36	\$ 64.50

* Stock price adjusted for stock splits. Source: Annual Reports Pursuant to Section 13 or 15(d) of the Securities Exchange Act of 1934 (Form 10-K), from 1996 through 2002.

Apollo's past aggressive growth is magnified in its goals for the future. The UOP 2002 corporate goal was "5-5-5": Five Years, Five Million Students and Five Billion Dollars.

The dynamics of public ownership, expectations of investors and lucrative stock options to UOP officers are integral aspects of the UOP system. Employees at every level are made aware of the importance of meeting the enrollment numbers and revenue expectations of Wall Street on a quarterly basis. For recruiters of students, UOP stresses the enrollment numbers on a daily, weekly, monthly and quarterly basis. UOP evaluates its recruiters' performances and provides for salary increases following initial recruiter training, with annual salary evaluations thereafter (at the end of each fiscal year).¹

3 SCOPE OF REVIEW

A program review was conducted of UOP on August 18, 2003 through August 22, 2003 to determine UOP's compliance with §487(a)(20) of the Higher Education Act of 1965, as amended, 20 U.S.C. §§1070, *et seq.* (HEA) and 34 C.F.R. §668.14(b)(22). The review consisted of, but was not limited to, an examination of UOP's policies and procedures regarding

¹ Until the 2000 Fiscal Year, UOP reviewed the salaries of its recruiters every six months, with salary to be adjusted up or down depending on the recruiters' performance. The Admissions Counselor Policy Guides provide only for annual salary evaluations thereafter and do not mention the reduction of salary. UOP's Admissions Counselor Policy Manuals also provide that in addition to these standard salary reviews for recruiters, a salary evaluation is performed after initial training.

admissions practices and recruiters' compensation. The reviewers examined the pertinent forms, policies and procedures and personnel documentation at UOP relating to Title IV administration, and conducted interviews with appropriate institutional personnel.

Prior to arrival at UOP, notice of the program review was provided by telephone and fax.

The on-site review encompassed visits to Apollo corporate headquarters, the Phoenix Campus, the Online Campus as well as five campuses in UOP's Northern California Division-- Oakland, San Jose, San Francisco, Pleasanton and Livermore.

During the visit, areas of non-compliance were noted. The finding of non-compliance is referenced to the applicable regulations. The finding specifies the actions to be taken by UOP to bring operations of the financial aid programs into compliance with governing authority.

4 DISCLAIMER

This program review was focused and thorough with regard to the issues of concern. It cannot be assumed to be all-inclusive. The absence of statements in the report concerning specific practices and procedures of UOP must not be construed as acceptance, approval or endorsement of those specific practices and procedures. Furthermore, it does not relieve UOP of its obligation to comply with all of the statutory or regulatory provisions governing the Title IV programs.

5 FINDINGS AND REQUIREMENTS

FINDING #1: Use of Incentive Compensation Based on Enrollments for Those Involved in Recruiting or Admission Activities in Violation of Title IV Requirements

5.1 Recruiter Compensation System

5.1.1 When Hiring Recruiters, UOP Promises Substantial Compensation

The reviewers interviewed more than 60 present and former recruiters of students (called "enrollment counselors" by UOP) prior to, during and after the site visit. While on site, the reviewers asked specifically to speak to those involved in enrolling students, both "on ground" as well as "on line." UOP officials chose certain recruiters to be interviewed. The reviewers also, however, randomly chose other recruiters, and interviewed those referred by other UOP employees.

Most of the recruiters said that when hired, UOP told them that the job had tremendous financial potential, and that they "could make a lot of money." UOP promised to double or triple their salary in three to six months if they successfully perform their duties. Many of the employees left a higher paying job to work for UOP because of the promise of the increase in salary in such a short period of time.

Drawn by the lure of a large salary potential, UOP employees in other positions transfer to jobs as recruiters. In particular, a number of academic counselors and advisors transferred to the higher paying recruiter position. Had these academic advisors not transferred to a recruiting position, they knew that their salary would not only be lower, but that annual salary increases would be minimal, generally only 2-6%.

UOP's recruiters soon find out that UOP bases their salaries solely on the number of students they enroll.

5.1.2 UOP Student Recruiting System – Focus on the Numbers

5.1.2.1 Sales Training – “Smoke & Mirrors”

UOP considers recruiters to be “counselors in training” or “freshmen” for their first 13 weeks of employment. During this time, they receive on-the-job training at the location at which they work. Soon after being hired, recruiters attend a one-week “Sales Academy” provided by regional and corporate management at the regional office. The Admissions Counselor Policy Guide for Admissions Managers and Directors of Enrollment considers this 13 week-period to be a “developmental program.” Employees learn the system for tracking leads, contacts, appointments, enrollments and other recruiting activities, such as the conversion of an appointment to an application. At the Sales Academy, recruiters learn sales tactics designed to pique the interest of potential students through the progression of enrollment activities, such as probing need, fostering trust, creating urgency and overcoming objections. These sales lessons are reinforced by one-on-one instruction at the school location. Recruiters also receive an orientation in the UOP methodology and history, learn about the programs of UOP and the UOP model of providing educational programs for working adults.

Recruiters are oriented to the personnel policies of UOP and are provided an Enrollment Counselor Policy Guide. Updated annually, the Guide details the recruiter salary levels, evaluation procedures, and rules pertaining to the crediting of enrollments to recruiters for purposes of recruiters’ performance. The Guide for 2002 establishes the following salary levels:

Freshman Admissions Counselor	\$26,000 - \$36,000
Admissions Counselor I (ECI)	\$26,000 - \$40,000
Admissions Counselor II (ECII)	\$36,000 - \$65,000
Admissions Counselor (Senior EC)	\$65,000 - \$100,000
Executive Admissions Counselor (Exec. EC)	\$75,000 - \$120,000

Either during, or shortly after, the initial 13-week period, the new recruiter also attends a one week “Student Advisement Workshop” (SAW) at UOP headquarters in Phoenix, Arizona. The SAW is an intense training on traditional sales techniques: probing and developing the potential customer’s need for the product, creating urgency and gaining commitment from the potential customer, and closing the deal. Typical of sales training, SAW is one of the tools UOP uses to motivate its sales force. Recruiters said that in spite of the name of the training, the SAW deals only with sales techniques and has little or nothing to do with academically advising students.

Freshmen recruiters advance to the title of “Enrollment Counselor I” (ECI) upon completion of their 13-week developmental program. Advancement to ECI may only be a change in job title, but if the new recruiter enrolls enough students during the 13 weeks, the advancement will also include a raise. Promotion to higher levels is determined on the basis of whether the counselor “meets”, “exceeds” or “always exceeds” expectations². Under the 2002 Guide, in order to be promoted to the title of “Enrollment Counselor II” (ECII), a recruiter must have three consistent

² Under the 2003 Admissions Counselor Guide, an ECI must have accumulated at least two quarters of Often or Consistently Meets Expectations and cannot have any quarters where his or her performance does not at least “Meet Expectations.”

quarters where performance "often or consistently exceeds expectations." Promotion to the title of "Senior Enrollment Counselor" (Senior EC) requires four consistent quarters where performance "often or consistently exceeds expectations." A Senior EC may be promoted to the title of "Executive Enrollment Counselor" by having eight consistent quarters where performance often or consistently exceeds expectations.

Early in a recruiter's training, UOP teaches a recruiter how UOP measures success through the use of a "matrix." The matrix lists specific recruiting activities, the numbers expected for each activity, and how these numbers relate to an overall rating of either "meets expectations," "often exceeds expectations" or "always exceeds expectations" – a rating that determines salary. Freshmen recruiters receive a matrix for each of the 13 weeks of training and they are evaluated weekly on their weekly numbers. The July 2003 SAW training coached counselors to refer to enrollments as "level one student information cards." At this training, UOP established that at the end of the 13-week training, the following expectations would determine the recruiter's overall rating and salary:

30-43 level one information cards (enrollments) = Meets
44-59 level one information cards (enrollments) = Exceeds
60+ level one information cards (enrollments) = Always
"Have no more than a 20% flake" (drop-out rate)

At SAW, UOP urges recruiters to use the matrix as a guide to reach their desired "level of success."

The matrix sets forth the rating ("meets," etc.) associated with the number of enrollments, and it is these criteria that supercede all others and actually determine salary. Recruiters are keenly aware of how the matrix numbers establish their salaries. At one time, the matrix had the salary printed on the matrix itself so that a recruiter could readily determine the number of enrollments needed to make a specific salary level. One recruiter said that it was common knowledge among recruiters that each enrollment is worth about \$750 in annual salary. In recent years, the matrix (containing the enrollment expectations) and salary levels associated with the matrix are separated into two documents such that recruiters have to simply put the two documents together to determine the salary levels associated with enrollment numbers.

UOP repeatedly reinforces the importance of enrollment numbers throughout its orientation and training of recruiters. Among the documents provided to newly hired recruiters is a document entitled "The Psychology of Enrollment Success at the University of Phoenix." This document touts the benefits and rewards of being a sales professional at UOP, including assertions such as:

- \$\$\$ - No limit on income
- Highest paid people in the world are salespeople
- Never have to worry about \$\$\$ again
- Top 20% Enrollment Counselors @ UOP = ave. \$75,000 +/yr
"other" 80% ave. \$25,000 +/yr.
- Top 20% = never worry about \$\$\$

The Winning Edge

Counselor #1	100 activities ³ /half	\$65,000
Counselor #2	79 activities/half	<u>\$36,000</u>
		\$29,000

3.5 additional activities / month = \$29,000

In the case of On Line recruiters, several recounted that their managers told them that UOP calculates their salaries on the basis of one half of the number of students each recruiter enrolls in a six month period; e.g., 90 students enrolled in six months equals \$45,000 in salary. On Line recruiters said that even though the matrix lists a number of steps in the recruitment process, such as telephone calls, conversions, etc., the reality is that none of these factors actually affect recruiter salary -- except the number of students enrolled. Some of the recruiters consistently exceeded the numbers for all steps except enrollments, yet received an overall evaluation of "needs improvement" simply because their enrollments failed to hit the requisite number. More than one recruiter said that managers simply falsified the numbers on the various factors to make the overall evaluation match the enrollment number and that managers told them that if they get the enrollments, the manager can make the other numbers match. For example, one manager told a recruiter: "You get the enrollments and we'll take care of the matrix. We can fudge the numbers on the matrix."

All recruiters indicated that they were not shown the matrix, or told of how enrollments related to salary, until after they were hired. Recruiters who had not yet completed their first salary evaluation were unaware that their salary would be based on anything but numbers of recruiting activities. New recruiters knew that numbers determined their salary, and generally knew that if they did "make the numbers" they could get a "good bump," but if they did not make their numbers, they would not get the raise they had expected when they were hired. Many commented that the bottom line was: if the enrollments are not there, don't expect a raise.

In addition to these training/motivational methods, UOP's Corporate Director of Enrollment visits the various UOP locations to provide additional training and motivation to recruiters. This corporate officer is known for his ability to motivate by touting the financial rewards of making the numbers, even though recruiters are aware that basing salary on enrollments is against the law. This Director of Enrollment, however, was quoted as telling recruiters: "It's all about the numbers. It will always be about the numbers. But we need to show the Department of Education what they want to see." Forty-four out of 61, or 72%, of the recruiters interviewed stated that it was always about the numbers -- all about "butts in seats" or "asses in classes --" to use the vernacular commonly heard at UOP. One recruiter stated that, "the culture in the organization gravitated away from quality education and quality counseling, to getting bodies in the door. The number of enrollments is what counts."

According to some recruiters, while the Corporate Director of Enrollment stresses the big dollars that come with high enrollments, he characterizes the compensation plan for recruiters as "smoke and mirrors" so that UOP can "fly under the radar" of the Department. More than one recruiter stated that they also heard the Director of Marketing say, when discussing the salary compensation plan for recruiters, "we're flying under the radar of the Department." Both managers and recruiters referred to the matrix as a "smokescreen" or "smoke and mirrors."

³Over the years, UOP has utilized various euphemisms to define the number of students a recruiter enrolls. Many times, UOP simply uses the word "enrollment" or "activity." As previously mentioned, during 2003 SAW training and on the 2003 matrix, UOP uses the phrase "Level One Student Information Card."

One recruiter, who recalled the Corporate Director of Enrollment saying "we're flying under the radar of the Department," believes that the "matrix is a way to deceive the Department."

5.1.2.2 Tracking Commissionable Sales and Sales Performance

In order to track the numbers on the matrix, UOP uses an elaborate tracking system to follow the student's enrollment progression and to track which recruiter is given credit for the enrollment. The computerized system called "Galaxy" tracks incoming calls, outgoing calls, leads to appointments, conversion of appointments to applications, scheduled appointments, actual appointments, referrals, applications, enrollments and "flakes" (withdrawals). UOP tracks these recruiting activities daily. Recruiters meet with their managers on a daily, weekly and monthly basis to go over the numbers and discuss how to increase them in order to reach the desired salary, sometimes referred to as the "desired level of success."

Recruiters maintain a manual list of each student they have enrolled when the application is completed. They then send this list to a regional marketing support coordinator. On a monthly basis, the regional marketing support coordinator prepares a list of all new enrollees and determines which students have attended at least three nights -- the point in time at which the recruiter may receive credit for salary purposes -- and also the point at which UOP can charge 100% of the tuition for the course and no longer must pay a refund. The marketing support coordinator then compiles what UOP has traditionally called a "Commissionable Starts Report"⁴ for each recruiter for transmittal to UOP headquarters. UOP then checks whether each new enrollee has made satisfactory payment arrangements. If the student has met the attendance and financial arrangement criteria, UOP tentatively gives the recruiter credit for the enrollment, and the student will be on the Commissionable Starts Report of the recruiter for the month. UOP then compiles the Commissionable Start Report for every recruiter at each location and sends them to the Corporate Operations Manager at UOP headquarters in Phoenix, Arizona.

The primary job of the Corporate Operations Manager is to track enrollments to assure that each recruiter receives the appropriate enrollment credit for a "quality enrollment" (an enrollment that has met both attendance and financial arrangement criteria) and to prepare a monthly report that lists enrollments by campus and by enrollment counselor. Upon receipt of the Commissionable Starts Report for each recruiter, the Corporate Operations Manager again checks whether the enrollment meets the above-listed attendance and financial criteria. For enrollments that fail to meet these criteria, she strikes their names from the Commissionable Starts Report and prepares a final approved list of students for which each recruiter will be credited. The Corporate Operations Manager then prepares a separate list for each recruiter. The final approved enrollment list, together with the Commissionable Starts Report showing the stricken students, are then bound by location in a final report referred to as the "Orange Book." UOP then sends the bound report to each location. This final bound report shows total enrollments by location as well as the final enrollments credited to each recruiter as well as each recruiter's rejected enrollments.

The Corporate Operations Manager then also updates a manually prepared Excel spreadsheet, maintained on a fiscal year basis, that lists all recruiters and their final enrollments for each month. This spreadsheet ranks all UOP recruiters from all locations by the number of enrollments credited to date. This spreadsheet is known as the "Stack Rankings," which UOP

⁴ For years, this report has been referred to as a "Commissionable Starts Report" and ECs referred to it as such. The report is also referred to as a "Commissionable Starts Report" in the instruction manual for the system that generates it. In recent years, UOP changed some of the references to the Report to "CPCC701 Enrollment Report."

sends monthly to the managers who generally distribute it to recruiters. The Corporate Operations Manager maintains a file on each recruiter in the organization that contains all Commissionable Starts Reports and all the monthly Stack Rankings.

In addition to the above procedures, at the local campus level, the Marketing Coordinators continually update and compile a manually prepared monthly report, entitled AC-Self Success Recap. This report captures the enrollment activities of each recruiter at the location. The report describes the "Meets Expectations" standards of each enrollment activity contained within a recruiter's matrix (Outbound Calls, Scheduled Appointments, Referrals, Corporate Information Cards, Student Information Cards, and Enrollments) and the actual numbers achieved by the counselor. The report also captures the conversion rates of each recruiter from "Level One Student Info. Cards" (Initial student enrollment) to an enrollment for which the recruiter will receive credit (three classes and financial arrangements). This report has been identified by many of the recruiters as the actual tool the recruiters' managers use in their monthly, quarterly and annual evaluations. UOP requires each manager to forward this report as an attachment to UOP's Corporate Enrollment office each month, no later than the fifth of the following month.

5.1.2.3 UOP's Aggressive Sales Motivation System

UOP's intense focus on numbers and enrollments per recruiter permeates the working day of each recruiter. Managers bombard the recruiters with emails daily – listing the top performers based on enrollments, applications, calls and other recruiting activities, with the pace of emails pushing numbers escalating at the end of each fiscal year as the annual report deadline nears.

Each campus holds a daily "morning huddle," formally called an "OSIRA meeting" at which each recruiter must report the number of enrollment activities accomplished the day before. At these meetings, the recruiters also report their goals for the day, projecting, based on their schedule, the number of outbound calls, the number of appointments scheduled and other recruiting activities they expect to perform. These meetings serve to motivate or humiliate the recruiters based on their activities. Managers go over the numbers and either praise or chastise each recruiter in front of the group. The managers then stress the weekly goals and applications UOP requires by the end of the week. The recruitment managers use a large board on which the statistics of activities of each recruiter are listed. Except when "visitors" are expected, UOP managers prominently post the board that lists these statistics.

On Mondays, the morning huddles also include a recap of the prior week. On a monthly basis, the meetings involve a monthly assessment and itemization of goals not met, and issues that need to be resolved in order to meet the goals. Managers also use these meetings to make announcements regarding the overall performance. For example, one Enrollment Director, in a teleconference with Northern California locations during an OSIRA meeting in the Fall of 2002 said:

My job is on the line. And I need you guys to perform. And there will be no exceptions. If you're not doing your job, you're going to lose your job. And if you're not hitting your goals, that's how we're going to measure if you're doing the job. And by the way, I don't mean applications in. I mean starts."

UOP used these frequent meetings to drive home the message that a recruiter's success in securing enrollments would equate to success in reaching his or her salary goal. For example, one recruitment manager would frequently say: "X is going to make a lot of money at the end of this quarter because he has X enrollments." It was common for managers to remind a recruiter

how many more enrollments were needed to get his or her stated salary goal. For example, one recruiter told the program reviewers that his manager's tactic was to say: "How much money do you want to make? Well, here are how many students you have to register to make that much."

UOP also frequently runs sales promotions, targeting the increase of enrollments at the end of each fiscal quarter. Such promotions may include the waiver of fees or the cost of books for student customers. Referred to as "blitzes," promotions are generally offered around the end of each quarter. During some "blitzes," UOP managers mandate that recruiters work unpaid overtime by working evenings and Saturdays.

In addition to the frequent face-to-face meetings, managers barrage recruiters with emails to remind them where they are on a ranking basis with respect to other UOP recruiters and emphasize the target number of student enrollments. Examples of such emails sent to recruiters on an On Line team read:

- *From a Director of Admissions on July 23, 2003 to ECs, entitled "July/August Goals":*

Now you know what is at stake and the rewards available at the end of the month of August, please tell me what your own personal goal is for July/August combined and what your goal is for your next 6 - month review. 140? 130? How much you would like to see your salary increase?

- *From an Enrollment Manager to ECs, April 24, 2002, entitled "Team Meeting this AM"*

Make sure that if you didn't hit your matrix # for MEETS in June, that you do it in July. EC1 that means 14, EC2 is 16...any questions?

• ***From an Enrollment Manager to ECs, June 28, 2002, entitled "Back to Basics":***

Your job, as Admissions Counselors, and sales professionals is to get in touch with every one of them as soon as possible to evaluate their needs and match the benefits of UOP with those needs, then close the sale.

The expectation for EC2 is that you meet the criteria of your matrix, and enroll 16 new students each month.

The expectation for EC1 is that you also meet the criteria of your matrix, and enroll 14 new student each month.

As a CIT, you're shooting for Always Exceeds on your matrix, and 30 new students in your first three months on the floor.

These numbers and criteria are measured on a quarterly basis, so know what your evaluation quarters are, and what your goals and running totals are. This is your process to manage. You can use vacation time when it's made available to you, but make sure that your students are taken care of, and that you still meet your expectations. If your production levels can't be maintained because of vacation time that you have planned, you need to work extra before and after the time off to make it a non-issue.

• ***From an Enrollment Manager to ECs, April 25, 2002, entitled "Please Reply to Me... Lunches"***

We've regged 17 new students in the last 2 days, and 11 of those were on Tuesday, WAY TO GO!!! As of last night we're at 57 REG and 36 APIN, more combined that either March or April, and we've only been prospecting for 5 days!!!!

Where are you in relation to your goal?? Right now you should plan on being at half-way (REG/APIN combined) when you walk in the door next Wednesday (May 1). As a team we're at almost exactly 33% of our promised 275!!!

If you think of it, I have the REG-O-METER on my door, and I've been updating it for the last couple days. Feel free to add your own when you put 'em in REG!!

One enrollment manager puts a spreadsheet on her recruiters' computer desktops that shows how many enrollments each recruiter needs to reach the next salary level. The following is an example:

	June	July	August	Sept	Oct	Nov		
Cleared	14	13	14	15	20	14	90	46K
Goals			17	20	25	17		

The recruiter who provided us the above spreadsheet explained that her manager placed it on her desktop at the end of July. It shows that the recruiter had 27 enrollments by the end of July. The August through November numbers reflect the number of "cleared" enrollments (non-withdrawals) that the recruiter will need in order to have 90 enrollments in the six-month period – an enrollment number that would result in the recruiter's desired \$45,000 salary. Typically, the manager keeps these spreadsheets updated and clearly visible on the recruiters' computer desktops. During the Department's site visit, however, the manager deleted these spreadsheets from the recruiters' desktops. (The reviewers obtained a copy of the spreadsheet from a recruiter who had saved the file before the manager deleted it from the computer desktop.)

5.1.2.4 Intimidation Techniques

Just as recruiters are rewarded for meeting or exceeding the enrollment numbers, they are also penalized for not meeting the enrollment numbers. Under UOP's salary policies, UOP also pays managers and directors on the basis of the number of enrollments secured by the recruiters under their supervision. Recruiters said that their managers were under a lot of pressure from UOP's corporate office to meet enrollment numbers. When recruiters fail to meet the enrollment goals set by UOP, the managers made it clear that the recruiters are causing the managers to fail. Many recruiters stated that the managers "tried to make their lives miserable" when their enrollment numbers are not high enough.

A number of recruiters stated that UOP did not hesitate to threaten them with loss of their jobs if they failed to meet the numbers. Several recruiters indicated that some managers' styles are so oppressive that even though one may be a top performer one week and praised as the "greatest," the same person is being threatened with termination the next week. "You are constantly threatened if you don't meet the numbers."

Many recruiters expressed concern about losing their tuition benefits if they failed to meet enrollment numbers. Some recruiters who were students indicated that they only intended to stay long enough to finish their degrees at UOP, and that they had to do whatever was necessary to meet the enrollment numbers to attain that goal.

At the On Line Campus, even more harsh methods were used to "punish" those who failed to meet enrollment numbers. Most On Line recruiters stated that their managers used heavy-handed intimidation tactics to humiliate them into improving their numbers. For example, one admissions director (one supervisory level above the admissions manager) is known to tell recruiters, when they fail to make the required enrollments, that they are "stealing from Brian Mueller" (CEO of UOP On Line).

Well known among the recruiters was the "Red Room" – a place viewed with fear and dread by recruiters with whom the reviewers spoke. Sixteen of the On-Line recruiters who were interviewed confirmed knowledge of the Red Room, and several were actually sent to the Red Room, as punishment for not meeting the number of enrollments required and/or expected by management.

The Red Room was a large room in which tables were lined up in the middle of the room. The room was encased in glass so that all in the area could see who was there. Banks of telephones were on the table, around which the underperforming recruiters were crowded to make telephone calls. Wires hung from the ceiling to provide power to the computers sitting on the tables. Senior recruiters and managers hovered over the unfortunate recruiters, listening to their calls and closely monitoring them. Those who were sent to the Red Room were allowed no vacation time and were allowed no breaks other than those specifically set for those working there. A recruiter sent to the Red Room was required to immediately leave his or her desk and take his or her computer there. Recruiters were required to work in the Red Room until they had attained the required number of enrollments. Recruiters indicate that UOP ceased using the Red Room in late 2002.

At both the On Ground and On Line campuses, a number of recruiters stated that the allocation of fresh leads and floor time was both an intimidation and reward tool to manipulate them into more aggressive and/or unethical tactics. Recruiters viewed leads as the source of obtaining enrollments and salary "bumps." When a recruiter was underperforming, managers would decrease the leads provided to the recruiter. Also, when a recruiter left UOP, the manager would divide up the former recruiter's enrollments. The granting of leads and credit for a former recruiter's enrollments was up to each manager. Those who had high enrollment numbers received more leads, enrollment credits and salary "bumps." Those with less enrollments had leads taken away, received no enrollment credits from former recruiters, received no salary increases and could have potentially suffered a pay cut. A number of the recruiters noted that those who did not "meet the numbers" of enrollments would be deprived of leads and floor time. A day of floor time means that the recruiter gets new leads that come in as walk-ins, as internet referrals, or call-ins. These fresh leads are cherished by recruiters.

This was confirmed by some of the new recruiters as well. Some recruiters were given very little floor time, which prevented them from meeting the number of enrollments expected by UOP. As one recruiter said, "UOP will make you successful if they want to—if they don't want to make you successful, they force you out."

Some Northern California recruiters indicated that in 2002, managers became very intimidating because the enrollment numbers were not up to par. San Jose recruiters were told that their "heads would be on a chopping block" if they did not hit their numbers. UOP also expected recruiters to meet their required enrollment numbers regardless of whether they had vacations, honeymoons, a death in the family, illness or other events that interrupted their work schedules. As one manager stated:

The expectation will be that if you aren't at your goal by 3/8 (for March) and 4/5 (for April), you and I will plan what additional time you'll be in the office on weekdays and on weekends to get the job done and get back on track. We need to quit thinking of this as a 40 hr/week job, and remember that we're getting paid to at least meet expectations (me included).

One recruiter recounted how her manager responded when she told him that she may need to go to New York for her grandmother's funeral. He said: "You can't afford the time away from the phone. You can't afford five days bereavement leave. And if you go, you have to prove that you went to the funeral and that she is dead."

A recruiter who misses the numbers for any month receives immediate notification from UOP. Managers closely supervise all activities of recruiters, scrutinizing their time as tracked in the

computer system. Recruiters who do not enroll sufficient numbers receive harsh emails from their manager chastising them.

The formal procedure for discipline of recruiters is set forth in the UOP personnel handbook and is commonly called "going on plan." The employee is given a written warning, set forth in a "Warning Letter" or "Discussion Memorandum." These warnings follow an established UOP format for recruiters. They begin by stating that the recruiter has failed to meet the expectations of the position of an Enrollment Counselor, and specify the numbers that the recruiter must meet in order to retain his or her job. Typically the memo sets forth a table such as the following, showing the "Weekly Goals" and the recruiter's actual performance for a three-month period:

Activities (Weekly Results)	Goals (Weekly)	May (Weekly Avg)	June (Weekly Avg)	July (Weekly Avg)
Contact to Activity	6%	2.5%	7%	0
New Enrollments	3	2	1.25	.5
Inbound Calls	40	63	50	46
Outbound Calls	250	393	363.25 *	368
Referrals	1	0	0	0
Lead to Contact	45%	55.5%	47.8%	39.8%

Of course, of these activities, only enrollments possess any real significance.

If the recruiter fails to meet these numbers, UOP places him or her on "decisional leave" – one day during which the recruiter is to decide whether he or she "wishes to be successful at UOP." During "decisional leave", the recruiter is not allowed to engage in enrollment activities and is required to set forth a plan of performance improvement to present to his or her manager. If the recruiter's performance fails to "meet" expectations, UOP fired him or her.

5.1.3 Recruiter Evaluation System Reinforces & Ranks the Quantitative

More than 70% of the recruiters reported that they were unaware of any basis for compensation other than enrollment numbers and recruiting activities. It is remarkable that the only recruiters who said that their salary also included qualitative factors, such as customer service, were recruiters chosen by UOP to be interviewed by the reviewers. *Literally every recruiter interviewed randomly or outside of the work premises said that the number of enrollments determined their salary.* Some reported that while they were aware that their evaluation form included some "qualitative, highly subjective" factors, their managers always assured them that UOP included these factors simply to deceive the Department and that UOP actually based salary raises solely on the number of students a recruiter enrolls.

During the quarterly evaluations with recruiters, managers consistently focused on the quantitative factors, particularly enrollments. The evaluation forms, however, also list certain qualitative factors at the bottom. Such factors include "Job Performance," "Working Relationships," "Communication" and "Customer Service." These qualitative factors, according to most recruiters, are simply conversions of the quantitative factors and are there simply to deceive the Department.

One recruiter recounted that he had asked his manager how these factors were determined and was told: "It's enrollments. You know it's enrollments. It will always be enrollments." Another recruiter queried his manager during his evaluation about each of these qualitative factors and

how they are determined. His manager told him that "Job performance" equates to the number of new enrollments, "Communication" means the number of conversions, "Customer Service" means the number of leads to contact, "Working Relationships" means resolving student issues to overcome objections and obstacles and "Judgment" meant getting students in class. This recruiter wrote his manager's response on his performance evaluation form. The form was then signed by both his manager and his manager's supervisor.

On Line Campus recruiters stated that even though the matrix lists a number of factors, such as telephone calls, conversions, etc., none of these factors actually affect the salary level – only enrollments. Some of the recruiters consistently exceeded the numbers for all areas except enrollments, yet received an overall evaluation of "needs improvement," simply because their enrollments failed to hit the expected number. Thus, if they did exceed expectations in all areas except enrollments, there would be no promotion. More than one recruiter said that managers simply falsified the numbers on the various factors to make the overall evaluation match the enrollment number. Managers told them that if the recruiter gets the enrollments, the manager can make the other numbers match.

Recruiters were generally aware that there was a Department prohibition against incentive compensation for enrollments. Thus, it was widely known that the evaluation forms kept in the personnel files were meaningless. Recruiters told reviewers that during the program review, prior to interviews with recruiters, some managers coached their employees to say that their evaluations and salary are based on the qualitative factors, not just enrollments. One of these managers said that it was all "just smoke and mirrors" when referring to the matrix. More than one recruiter said that "the matrix is just a smokescreen," and that "everyone knows that the matrix is a joke." Another recruiter stated that his manager told him that, "Your matrix says that you have to bring in 100 leads a month. Your pay and performance review are based on that." Another recruiter said that her manager told her that, "The matrix doesn't matter, it's the Regs [meaning registrations or enrollments]. We can manipulate the matrix any way. You get the Regs and we'll take care of the matrix." Another recruiter said, "The matrix is a lot of bologna. The matrix talks about customer service, communications, judgment, but when you talk to your manager, the manager tells you that it is the enrollments. If you get 50 Regs/quarter, then you can earn \$50K."

According to one Director of Enrollment (previously a recruiter), the qualitative annual review to discuss professional development is just the "lousy, feely" review. "Promotions are based on exceeding numbers only. Other factors that are considered for the annual review are: rapport with students; referrals; etc. These are evaluated for the small annual raise." The following comments about the "qualitative" review were made by different recruiters at the various locations visited by the reviewers:

- "The qualitative factors in the employee handbook are not mentioned. My manager told me that evaluations and salary are based only on the matrix, specifically Info. Cards – enrollments.
- "If you get the regs., the other numbers of phone calls, appointments, etc., magically appear."
- "Reviews are really based on quantitative factors: They make the things match, but it's really the number of enrollments you have."

- "The matrix talks about customer service, communications, judgment; but when you talk to your manager, the manager tells you that it is the enrollments that count."
- "The amount of money was dependent on how many students I enrolled. Other factors such as communication are not mentioned."
- One manager told a recruiter during an evaluation: "The qualitative has to align with whatever is on the first page (the quantitative numbers). . . . We have got to make the qualitative portion of your review match where you fit on your numbers."

Some recruiters indicated further that it was widely known that supervisors would simply adjust the "qualitative factors" to match the numbers. Recruiters overwhelmingly confirmed that the number of enrollments was the "bottom line." Recruiters stated that even though the number of enrollments was the actual basis of their salary, management was always careful not to put this in writing due to awareness that the Department prohibited incentive compensation based on enrollments. Recruiters who asked their managers to put the enrollment requirements in writing were refused.

One enrollment director, who had also been an enrollment manager, and was hired in the early 1990s, recalls that when she was hired, the matrix included the number of enrollments. With this old matrix, evaluations were very straightforward. The number of enrollments established the salary. In the late 1990s, however, the Corporate Director of Enrollment issued a directive to managers explaining that UOP could no longer directly put the number of enrollments on the matrix because to compensate recruiters based only on the number of students enrolled was illegal. As a result, UOP introduced "qualitative" factors into the matrix. In addition, UOP began maintaining two files on recruiters; one was the "activity" file, kept at the local campus; the second was the Human Resource/official personnel file, kept in headquarters in Phoenix. The "official" human resource file contains only qualitative ratings. The quantitative data is kept in the activity file and forms the basis for salary evaluations.

This director explained that during performance evaluations, the manager sits down with a recruiter and goes over the recruiter's enrollment goals (number of telephone calls required to be made to prospective students, number of appointments required, number of interviews required out of the appointments set, number of enrollments required per given time period) and compares them to how the recruiter actually performed with respect to these goals. Enrollments are weighted more heavily than other steps in the recruitment process, because a recruiter can make 300 telephone calls, but if they are not "converting" them to enrolled students, then the number of calls made is not important. The matrix is a tracking tool that managers and recruiters use on a weekly basis to track actual performance to goals. As always, the more students a recruiter enrolls, the more money he or she earns.

The switch to including qualitative factors in a performance evaluation was difficult for many managers. With the extra layer, some managers sent evaluations that contained high ratings for a recruiter's ability to communicate well, for instance, when the recruiter was failing to meet his or her enrollment goals. Some managers suggested a pay raise anyway, based on the fact that the recruiter "often or always exceeded expectations" in the manager's opinion in all of the qualitative categories. According to one manager, when this occurred (that a promotion was recommended based on the qualitative factors instead of enrollments) headquarters rejected the recommendation.

As a result of this confusion by some managers, in late 1999 or early 2000, UOP's Corporate Director of Enrollment came up with a "key"—a document that explained to directors of enrollment how properly to convert quantitative factors into qualitative factors. This key was a line-by-line reproduction of the qualitative factors off of UOP's standard performance evaluation, the one maintained in the "official" personnel file with a translation of how managers should equate those factors with a recruiter's quantitative enrollment numbers. For instance, the key said that if a recruiter wasn't making enough telephone calls, the manager should check the "requires improvement" or the "unsatisfactory" box in category IV. 4. (IV. "Working Relationships" 4. "Establishes and promotes constructive working relationships").

5.1.4 Salaries Actually Based on Quantity of Recruiting Activities

The evaluation system at UOP, designed to obfuscate the fact that salary evaluations for recruiters is founded solely on the number of students a recruiter enrolls and, did, in fact, result in significant financial rewards for those who rose to the top of the Stack Rankings. For example, UOP promised one recruiter, hired in April 2000 at \$32,000, that her salary would double in nine months if she enrolled 116 students – a number that fell in the "exceeds expectations" category on the matrix for the time period. According to UOP's matrix, enrollments in excess of 120 for six months rates as "always exceeds." Under the UOP Enrollment Counselor Policy Effective Fiscal Year 1999, the "always exceeds" salary level is \$76,000 - \$110,000. This recruiter enrolled 148 students in her first nine months, resulting in an "always exceeds" rating in her first evaluation. UOP increased her salary to \$88,000, a raise of \$56,000 per year, as of February 1, 2002, only ten months after UOP hired her.

UOP's salary history data substantiates that the above example is no exception. Salaries for recruiters consistently tracked the matrix / salary guidelines set forth in the UOP Enrollment Counselor Policies for each year since August 1, 1999. Thus, as in the above example, some new recruiters, hired at \$28,000 - \$32,000, received phenomenal raises in their first year, such as:

Recruiter	# Enrollments In 6 mos Prior to Evaluation	Salary Before Evaluation	Raise	Salary after Evaluation
#1, hired 6/1999	136	\$28,000	\$58,000	\$86,000 a/o 4/2000
#2, hired 6/1999	112	\$32,000	\$47,700	\$79,700 a/o 3/2000
#3, hired 5/2000	151	\$28,000	\$57,000	\$85,000 a/o 3/2001
#4, hired 3/2000	127	\$30,000	\$50,000	\$80,000 a/o Jan 2001
#5, hired 6/2001	100	\$34,000	\$24,000	\$58,000 a/o 3/2002
#6, hired 4/2002	100	\$30,000	\$37,000	\$67,000 a/o 5/2003

Recruiters who fell lower on the Stack Rankings—those who were in the “meets” range for new recruiters—generally 78 – 95 enrollments for six months,⁶ received no raise or only a small percentage increase (2% - 10%) raise.

Recruiter	# Enrollments In 6 Mos prior to Evaluation	Salary Before Evaluation	Raise	Salary after Evaluation
#7, hired 4/1999	98	\$41,300	\$1,700	\$43,000 a/o 6/2000
#8, hired 11/1999	79	32,000	\$4,000	\$38,000 a/o 9/2000
#9, hired 11/1999	93	\$38,000	\$2,000	\$40,000 a/o 9/2001
#10, hired 1/2000	57	\$28,000	\$1,000	\$29,000
#11, hired 9/2001	77	\$33,000	\$1,600	\$34,600

As a result of the evaluations UOP performs quarterly, the school reviews recruiters' salaries annually.⁸ The evaluation form sets forth the various factors of the matrix, rating each factor as “Unsatisfactory”, “Requires Improvement”, “Meets Expectations”, “Often Exceeds Expectations” or “Always Exceeds Expectations”. At the bottom of the form, the manager checks an overall performance level of the recruiter, on a quarterly basis. UOP then establishes the salary of the recruiter based on this bottom line rating (Meets, etc.). If the recruiter meets the performance requirements for promotion, the manager completes a Personnel Action Form recommending a salary increase or promotion. This form must then be approved by those in the chain of command at the local level before being sent to the Corporate Operations Manager, the person responsible for maintaining the Stack Rankings, who once again verifies that the enrollments attributed to the recruiter are accurate. The Corporate Operations Manager's approval was obtained on all raises and promotions of recruiters reviewed.

A review of the salary history of UOP recruiters, in conjunction with the Stack Rankings, demonstrates that UOP consistently grants enormous salary increases to those with high enrollment numbers. Generally, recruiters with over 200 enrollments per year have salaries in the \$80,000 - \$100,000 range, regardless of how long they have worked for UOP. Recruiters who reach this enrollment target can be assured that UOP will reward them with whatever raise necessary to reach this salary level. For example, UOP gave recruiter #1 a \$58,000 raise, bringing his salary to \$86,000 per year, in 2000 when he enrolled 230 students and was #9 out of 430 in the Stack Rankings. UOP awarded recruiter #3 a \$57,000 raise, increasing her salary to \$85,000, in 2001 when she enrolled 280 students and was #6 out of 396 in the Stack Rankings. UOP provided recruiter #4 a \$50,000 raise, increasing her salary from \$30,000 to \$80,000 in 2001, a fiscal year in which she enrolled 210 students and ranked #33 out of 396 in the Stack Rankings.

⁶ The matrix enrollment requirements for each category varied slightly from year to year and between areas of the country. Also, the enrollment requirements for ratings were different depending on whether a recruiter was new or experienced (more than one year).

⁸ Currently, and as of the 2000 Fiscal Year (year beginning September 1, 1999), salary evaluations are performed annually after the evaluation following initial training. In prior periods, these evaluation and salary review periods have varied from six months to nine months.

Until the year 2000, UOP historically also decreased recruiters' salaries when they failed to maintain their level of enrollments. The salary history data of UOP also confirms this practice.

5.2 Bonus Incentives Awarded on Basis of Success in Securing Enrollments and Quantity of Recruiting Activities

5.2.1 Sperling Club Trip Awards

Named after the UOP founder, John Sperling, UOP sponsors "Sperling Club Trip Awards." Sperling trips are all-expense paid trips, for the recruiter and his or her partner, to a nice location. Sperling trips cost UOP between \$500 - \$1,000 per winner. Under the Sperling Club Trip Award program, recruiters may win a Sperling Trip by successfully enrolling a specific number of students within a given period of time. For example in one Sperling Trip promotion, UOP promised that recruiters who enrolled 71 students during the months of June through August 2000 would receive a Sperling trip. One recruiter who won this award enrolled 76 students. She indicated that the trip included wining, dining, awards, kudos, a trip to Universal Studios, a trophy and a plaque. The trip was all-expenses paid, including the expenses of her husband. This recruiter also won a Sperling trip to Las Vegas, and since she significantly exceeded the enrollment goal, UOP also gave her \$100 worth of gambling chips.

The majority of recruiters interviewed confirmed knowledge of the Sperling Club Trips. All confirmed that the awards are based on solely on the number of students recruiters enrolled. UOP management in Phoenix insisted that Sperling Club Awards are based on a number of factors, not just enrollments. However, enrollment managers and recruiters all confirmed that Sperling Club Trips for recruiters were awarded based solely on the number of enrollments. One enrollment manager stated: "Sperling is definitely based on enrollments. There is a set goal and the counselor has to obtain it in order to win."

Sperling Club Trip Awards are announced and promoted by managers via email to recruiters. For example, one email recently announced that a Sperling trip is coming up and explained that in order to win, a recruiter must get 50 new students to enroll and complete the first course. Several recruiters confirmed that they had won Sperling Club Trips. Such trips included an all-expense paid trip for one recruiter and her husband to Washington D.C., where UOP covered the costs of accommodations at the Watergate Hotel. This recruiter said that her manager informed her that she had won by sending her the following email: "... it's official. Every new enrollment has been confirmed and you have achieved president's level of the Sperling Trip"

In the recent past, managers have been more careful about announcing the number of enrollments required for a Sperling Club Trip. Aware of the Department's prohibition against incentives based on recruiting activities, managers have typically masked the target number required to win. For example, one director of enrollment sent an email that stated: "You all know that I celebrated my 50th birthday. So seniors, you know how many enrollments are needed. You all know what birthday I celebrated this month." Recently, however, for the 2003 September Sperling Trip to San Francisco, the director of enrollment orally announced the requirements rather than sending an email: EC2s and senior ECs would need 34 starts (not applications) and freshmen and EC1s would need 25. This was announced at an OSIRA meeting attended by all recruiters at the location.

5.2.2 Prizes, Gifts and Bonuses

In addition to awarding expense-paid trips for enrollments, UOP provides incentive awards for securing enrollment applications or numbers of other recruiting activities. A number of recruiters confirmed having received gift certificates from their managers for obtaining a certain number of applications or otherwise winning a recruiting activity contest within a given period of time. Such incentive awards included:

- \$100 Macy's or other gift certificate
- \$100 dinner gift certificate
- DVD player
- \$100 Toys R Us gift certificate
- Electronic digital camera
- Spa packages
- Ski tickets
- Lottery tickets
- A's Baseball tickets
- Cash
- Portable CD Player

UOP ran these contests during months that enrollments were down or numbers were behind. They generally focused around quarterly or annual reporting periods.

Enrollment managers and recruiters confirmed that UOP bases these awards solely on the numbers of certain recruitment activities.

A typical email for these awards is the following:

From: Enrollment Director
Sent: 1/17/2003
To: NCAL ENROLLMENT
Subject: MAKING PROGRESS/CONTEST
Thank you for your commitment this past week. . . You have shown that January is not out of reach. . . And sitting in my hot little hands is a \$100.00 dollar Toys R Us gift certificate just waiting to be taken from me and used.
HERE'S THE DEAL . . .
You have from today 1/17 until 5:00 PM on 1/24 to win it. . . HERE'S HOW
1. Whoever takes the most APPLICATIONS FOR JANUARY from 1/17 to 1/24 WINS. . .
NOTE: IT TAKES 7 APPLICATIONS MINIMUM TO WIN

If each of us can add 3 applications between 1/17 and 1/24 we will be real close to our goal in January which will set the table for a SUPER February. . . Regards,

At the On Line Campus, contests were run from time to time, based on enrollments or applications within a given period of time, but such contests were far less generous. They included a free dinner at PF Changs or a similar prize. In the quarterly meeting at the end of the most recent fiscal year, ending August 2003, UOP On Line gave overnight hotel stays to recruiters who had 25 enrollments or more

UOP's On Line Campus also frequently ran contests that awarded time off -- usually Fridays -- where application targets are met within a specific timeline. On the other hand, where numbers were not met, recruiters might receive an email from their manager informing them that overtime or weekend time, without pay, would be required.

5.3 Ramifications / Results of System in Practice

5.3.1 Pressure to Enroll Unqualified Students

Recruiters frequently mentioned their concern for student customers for whom UOP was not a good educational option, such as customers who, because of their family and financial situation, could not reasonably expect to complete a degree program at UOP and would be better served by other alternatives, such as a community college. UOP managers chastise recruiters who suggest anything other than UOP. UOP makes it very clear that recruiters are to do whatever it takes to get the student to enroll. Some managers told recruiters that if a student drops after the first five-week course, it should not be their concern, because by then, the recruiter and the manager will have received the enrollment credit.

Recruiters at both On Ground and On Line stated that they are pressured by management to enroll students who are not qualified. They indicated that managers chastise them for failing to pressure students into enrolling or staying in their first class, in spite of the lack of financial resources. UOP makes it clear that recruiters are expected to find a way to "overcome objections," e.g., if the problem was insufficient funds, encourage Title IV funding. If the objection was insufficient Title IV funds, pressure the student to seek a private loan.

Some recruiters who were also UOP students expressed concern that UOP kept students in class even though they were unable to perform. Some mentioned that UOP pressured instructors to pass all students, regardless of performance.

5.3.2 Focus on Obtaining Credit for Enrollment, Not Completing Education

From its monthly Commissionable Sales Reports, to its Admissions Counselor Policy Guide, to its repeated reminders from managers, UOP reinforces to recruiters that UOP evaluates and pays them solely on the basis of how many students they enroll. Recruiters recounted how they are careful to follow students until they met the criteria that resulted in credit to the recruiter's enrollment count for purposes of salary -- specifically, that the student must attend three nights of the first five-week course of a bachelors' program or, for graduate students, attend two nights of a graduate class and be scheduled to attend a second class. After the student has met these criteria, the managers do not want the recruiters to spend time with a student. UOP requires them to pursue new enrollments, not follow those who have already completed one course.

Many recruiters thought that this system of selling the student and then dropping them once the enrollment credit is earned, underscores UOP's lack of concern for its students. Those who had been at UOP for several years all stressed that at one time, UOP had been more student and education oriented. After its Wall Street debut, however, UOP eliminated the focus on students and became increasingly aggressive in its obsession with numbers: new enrollments, meeting Wall Street expectations, maintaining profit margin. This is especially acute in the case of UOP On Line, where in quarterly meetings with recruiters, the Chief Operating Officer has stated that

he intends for "UOP On Line to be the Microsoft of on line education" and that "UOPX will crush Capella"⁷ or other competitors, "like a grape."

5.3.3 Intense use of Title IV Funds as Sales Tool / Culture of Duplicity

Recruiters at the On Line Campus were aware that many improprieties involving Title IV funding and the enrollment process occurred in order to receive credit for enrollments. "People do a lot of sneaky things to get regs (enrollments)." For example, there was one recruiter who created an entire FAFSA and completed all the forms for the student. He created the login and password for the student and the student could not even get into his account because he did not have his password. Recruiters also represented that Title IV funds would pay all costs, and that students would have no out of pocket expense for their UOP education, when, in fact, Title IV funding does not cover all costs. These recruiters all expressed concern that students recruited in this manner were being deceived, because UOP begins vigorous collection efforts as soon as a student withdraws or completes a program – an event that catches many students by surprise. One recruiter went so far as to say that he hears recruiters "lie to students every day."

A number of recruiters at the On Line Campus were aware of instances where other recruiters had forged or "cut and pasted" student signatures electronically onto master promissory notes and other enrollment documents in order to get the application or enrollment credit by announced deadlines. Employees recounted that one recruiter was so good at forging student signatures, that he was dubbed "The Doctor." One manager expected his recruiters to complete paperwork that the student is required to complete. He went so far as to train new recruiters how to complete or modify a student's paperwork in order to expedite the credit of an enrollment.

At the On Line Operation, recruiters are taught how to use Title IV funding as an effective tool for closing a sale. UOP On Line provides its recruiters with financial aid instruction on how to use Title IV to "overcome objections." The training program and sales materials for recruiters teaches them how to use financial aid effectively as a sales tool. One of the strategies is to ask the potential student: "You can afford \$50 per month for your bachelors, can't you?" The recruiter then tells the prospective student that all they really need to complete for now is the first five-week course. Title IV funding covers the costs of this course. Students can then withdraw, work on getting CLEP credits and return in a year or two at a higher grade and loan eligibility level. Students do not have to pay back any loan money until six months after withdrawal and the loan payments will only be about \$50 per month because the loan is only for the first five-week course. This way, there is no "out-of-pocket" cost. A number of recruiters mentioned this strategy as very effective in "overcoming objections."

5.4 Conclusion: UOP Violated Incentive Compensation Prohibitions and Breached its Fiduciary Duty

5.4.1 Deceptive Practices to Mislead The Department

The sales philosophy at UOP and practice is designed around evasion and relies upon euphemisms to avoid detection by the Department. UOP systemically established terminology and procedures to hide the fact that UOP pays distinct and significant financial incentives solely based on recruiters' success in securing enrollments. Since evaluations and salaries based on

⁷ Capella University, headquartered in Minneapolis, Minnesota, is one of UOP's largest competitors for on line students

enrollments would be readily detectable by an auditor or Department reviewer. UOP refers to enrollments as "activities or *level one student information cards.*"

Several recruiters told the reviewers that they had confronted their managers during evaluations about the fact that they were actually being evaluated on enrollments, not the "fluff" factors printed on the evaluation forms (the subjective factors: Judgment, Customer Service, etc.). All were told by UOP that it will always be about enrollments. One recruiter quoted his manager as saying: "You know you are evaluated on the basis of enrollments and we've always talked about that. You know that. It's never ever been a secret that there is an enrollment number that you are expected to hit." All On Line Campus recruiters who were interviewed, except for those chosen for interview by UOP, stated that their salary was based on the number of students they enroll, a fact that managers reiterate frequently on an oral basis, although they never put it in writing.

Recruiters also told reviewers that whenever "visitors" (government visitors, accreditation visitors) were expected, recruiters are coached by managers on what to say. Typically, according to these recruiters, required enrollment and/or application numbers are very visibly posted on the walls and on desks. When "visitors" are expected, however, these posters and desk 'reminders' are removed until the visitors are gone.

Literally every current UOP employee who has worked longer than a year, expressed anxiety over possible retaliation by UOP. Many commented on the fact that in the current economy, jobs are very difficult to find, and UOP never hesitates to replace anyone that it considers to be other than a loyal "team player."

Recruiters consistently mentioned the focus and pressure to increase enrollments to report to Wall Street. Many expressed that while UOP at one time focused on the student and stressed ethical conduct, the culture now is one where the emphasis is on increasing the numbers, the stock price and meeting Wall Street expectations. UOP's corporate culture, steeped in "smoke and mirrors," creates a façade where some can survive, prosper and get rewarded. Often ethics are set aside.

5.4.2 Cover Up During Review

UOP's behavior during the program review process further substantiates the ethical concerns expressed by both current and former employees.

One of the On Line recruiters said that her manager called her and one of her teammates aside when it was learned that the Department was reviewing the incentive compensation issue and would visit the On Line operation. The manager coached them to say that salaries were based on a number of factors, not just enrollments. The manager further instructed them that they were not to speak to any former UOP employees about what goes on at UOP.

After the announcement of the program review, UOP informed its recruiters that if they were contacted by someone from the Department for an interview, they were first to inform management prior to speaking with him or her. Recruiters uniformly stated that they felt very intimidated by UOP due to this pronouncement.

On the first day of the review, UOP officials were told that the focus of the review was the compensation plan for those involved in admissions activities, and that the review would encompass both Northern California and Phoenix locations and involve interviews with UOP

staff. Shortly after this announcement, UOP management told some recruiters at the Northern California locations that they should take leave or attend some function away from the premises. When contacted by the Department after the site visits, these recruiters indicated that they were absent for interviews because they had reputations for being honest and frank.

At the San Francisco location prior to the announcement of the program review, UOP was operating a contest for recruiters that awarded prizes based on the number of applications. This contest (for the busiest month of August) was celebrated by placing Monopoly money on a bulletin board in the office with numbers (corresponding to Applications obtained). Once a recruiter achieved the requisite number of Applications, they could lift the number and find the prize underneath. The lower numbers consisted of lottery tickets, but some of the higher prizes reached into the hundreds of dollars in cash. Upon announcement of the program review, however, UOP removed the Monopoly game.

At the On Line Campus, UOP generally posts large banners ranking the recruiters by the number of enrollments cleared. UOP removed these banners shortly before the arrival of the reviewers for interviews of On Line personnel. The UOP spreadsheets posted on recruiters' computer desktops that showed the salary / enrollment "goals" were also removed the day of the reviewers' arrival at the On Line Campus.

The actions of UOP and the system it has established cultivates and maintains a corporate culture in defiance of UOP's fiduciary duty. UOP has created an environment that pits the strong motivation of individual gain against its fiduciary duty to the Department. It is one that flaunts the Department's regulations and the prohibition against incentive compensation based on enrollments.

6 REFERENCES

Sections 487(a) and 487(a)(20) of the Higher Education Act require that:

In order to be an eligible institution for the purposes of any program authorized under this title an institution . . . shall . . . enter into a program participation agreement with the Secretary. The agreement shall condition the initial and continuing eligibility of the institution to participate in a program upon compliance with the following requirements:

. . . The institution will not provide any commission, bonus, or other incentive payment based directly or indirectly on success in securing enrollments or financial aid to any person or entities engaged in any student recruiting or admission activities or in making decisions regarding the award of student financial assistance. . . .

From July 1994 until November 2002, the General Provisions regulations at 34 C.F.R. §688.14(b)(22) codified this prohibition of commissions or incentives based on securing enrollments in the section relating to Program Participation Agreements, as follows:

By entering into this program participation agreement, an institution agrees that . . . it will not provide, nor contract with any entity that provides, any commission, bonus, or other incentive payments based directly or indirectly on success in securing enrollments or financial aid to any persons or entities engaged in any student recruiting or admission activities or in making decisions regarding the awarding of student financial assistance. .

The Department amended the provision to specify 12 "safe harbor" compensation and payment plans. These "safe harbors" were designed to allow institutions to maintain compensation plans that provide for increases to fixed compensation while remaining in compliance with the HEA and implementing regulations. 67 Fed. Reg. 51723 (Aug. 8, 2002). These "safe harbors" included:

- 34 CFR §668.14(b)(22)(ii)(A): Adjustments to fixed employee compensation
- 34 CFR §668.14(b)(22)(ii)(B): Enrollments in programs that are not eligible for Title IV
- 34 CFR §668.14(b)(22)(ii)(C): Contracts with employers
- 34 CFR §668.14(b)(22)(ii)(D): Profit-sharing or bonus payments to all employees
- 34 CFR §668.14(b)(22)(ii)(E): Compensation based upon program completion
- 34 CFR §668.14(b)(22)(ii)(F): Clerical pre-enrollment activities
- 34 CFR §668.14(b)(22)(ii)(G): Managerial and supervisory employees
- 34 CFR §668.14(b)(22)(ii)(H): Token gifts to students or alumni
- 34 CFR §668.14(b)(22)(ii)(I): Profit distributions based on ownership
- 34 CFR §668.14(b)(22)(ii)(J): Internet-based activities
- 34 CFR §668.14(b)(22)(ii)(K): Payments to third parties for non-recruitment activities
- 34 CFR §668.14(b)(22)(ii)(L): Payments to third parties for recruitment activities

As amended in 2002, the regulation now provides, in relevant parts, that an institution agrees that:

(i) It will not provide any commission, bonus, or other incentive payment based directly or indirectly upon success in securing enrollments or financial aid to any person or entity engaged in any student recruiting or admission activities or in making decisions regarding the awarding of title IV, HEA program funds. . . .

(ii) Activities and arrangements that an institution may carry out without violating the provisions of paragraph (b)(22)(i) of this section include, but are not limited to:

(A) The payment of fixed compensation, such as a fixed annual salary or a fixed hourly wage, as long as that compensation is not adjusted up or down more than twice during any twelve month period, and any adjustment is not based solely on the number of students recruited, admitted, enrolled, or awarded financial aid. For this purpose, an increase in fixed compensation resulting from a cost of living increase that is paid to all or substantially all full-time employees is not considered an adjustment.

(E) Compensation that is based upon students successfully completing their educational programs, or one academic year of their educational programs, whichever is shorter. For this purpose, successful completion of an academic year means that the student has earned at least 24 semester or trimester credit hours or 36 quarter credit hours, or has successfully completed at least 900 clock hours of instruction at the institution

(F) Compensation paid to employees who perform clerical "pre-enrollment" activities, such as answering telephone calls, referring inquiries, or distributing institutional materials.

(G) Compensation to managerial or supervisory employees who do not directly manage or supervise employees who are directly involved in recruiting or admissions activities, or the awarding of title IV, HEA program funds.

(H) The awarding of token gifts to the institution's students or alumni, provided that the gifts are not in the form of money, no more than one gift is provided annually to an individual, and the cost of the gift is not more than \$100.

34 C.F.R. §668.14(b)(22).

The first safe harbor, pertaining to salary adjustments, was designed to create a "balance between the need of an institution to base its employees' salaries or wages on merit, and concern that such adjustments do not make the statutory prohibition against the payment of commissions bonuses, and other incentive payments meaningless." 67 Fed. Reg. 51723 (Aug. 8, 2002). The Secretary of Education stressed, in the Preamble to the Notice of Proposed Rulemaking, that while salary adjustments based on merit do not, *per se* violate the prohibition; salary adjustments based solely on the number of students recruited, admitted, enrolled, or awarded financial aid do not fall within the safe harbor. *Id.* The safe harbor was not intended to exclude salary adjustments that are "formulated in a way that circumvents the statutory prohibition against incentive payments." *Id.*

When enacting §487(a)(20) of the HEA in 1992, the conference report indicated that the drafters did not mean to imply that institutions could not base salaries or salary increases on merit. The Congressional concern addressed by §487(a)(20) was to prevent an institution from providing incentives to its staff to enroll unqualified students. 67 Fed. Reg. 67053 (Nov. 1, 2002). The regulation was drafted to set forth specific arrangements that constitute legitimate business practices that did not support the enrollment of unqualified students. *Id.* Thus, in discussing the various safe harbors, the Secretary repeated the theme that a payment practice will not fall within a safe harbor when it is tied to student recruitment. For example:

- salary adjustments based on success in securing enrollments remain prohibited;
- denial of cost of living increases tied to student recruitment remain prohibited;
- a third party marketing firm that pays its employees on the basis of activities related to recruitment, admissions, enrollment or financial aid also violates the prohibition

67 Fed. Reg. 67056-67057 (Nov. 1, 2002).

Applying this guidance to UOP's system of recruiter salary compensation, we find that UOP:

- hires its recruiters with the promise of lucrative compensation for success in securing enrollments;
- maintains a recruiter evaluation and salary system that provides incentive payments based both directly and indirectly on success in securing enrollments;
- provides substantial incentives to its staff to recruit unqualified students and students who cannot benefit from the training offered;
- systematically and intentionally operates in a duplicitous manner so as to violate the Department's prohibition against incentive compensation while evading detection.

Accordingly, UOP is in direct violation of §487(a)(20) of the Higher Education Act.

7 REQUIREMENTS

The requirements herein apply to all UOP institutions, including University of Phoenix, University of Phoenix On Line and Western International University.

In response to this Program Review Report, UOP is required to make substantial and comprehensive changes to the salary compensation system for its recruiters and their direct supervisors. It must also provide the specific documents and information specified below. UOP's response must include:

- policies and procedures for notifying and training its recruiters, admissions managers and admissions directors of the Department's rule prohibiting any commission, bonus, or other incentive payment based directly or indirectly upon success in securing enrollments or financial aid to any person or entity engaged in any student recruiting or admission activities;
- policies and procedures for any employee of UOP to notify the Department directly and confidentially, by contacting the San Francisco Case Management Team of any plan or program that provides any commission, bonus or other incentive payment based directly or indirectly upon success in securing enrollments or financial aid to any person or entity engaged in any student recruiting or admission activities;
- policies and procedures specifically providing that no retaliation shall be made against any such employee who provides the notification outlined above.

Documents and Information to Be Provided.

1. Salary History Report. UOP is to conduct a review of its salary records for all employees (both UOP and WIU) engaged in any student recruiting or admission activities on or after September 1, 1998 to the date of its response and prepare a salary history report for all such employees, including admissions counselors and managers. Such report must be in either Excel or Access format and be provided electronically, setting forth the following information with respect to each such employee:
 - a. Last Name
 - b. First Name
 - c. Social Security Number
 - d. Date of hire and position for which hired
 - e. Beginning salary
 - f. Date and amount of each salary change
 - g. Amount of each salary change
 - h. Each position held at UOP and beginning date for each position
 - i. Employee's current status (current employee, terminated, leave of absence)
 - j. For terminated employees, the date of termination
2. Monthly Starts/Enrollments Report for each recruiter employed by UOP or WIU for all employees engaged in any student recruiting or admission activities on or after September 1, 1998. Such report must be in either Excel or Access format and be provided electronically, setting forth the following information with respect to each such employee:

- a. Last Name
 - b. First Name
 - c. Social Security Number
 - d. Month and Year
 - e. Number of enrollments for each month
3. Admissions' Managers and Directors' Documentation used on or after September 1, 1998 to the present, including training materials, instructions, memorandum, charts or any other documents that were provided to, used by and/or were in effect for the purpose of guiding or instructing managers, directors and those involved in management as to how to evaluate any employee, in the position of: enrollment or admissions counselor, academic counselor, financial intake specialist, re-entry counselor, including, but not limited to the "key" and all memoranda and email transmitting the same used to instruct managers with respect to the rating of various factors listed on any evaluation form, matrix and/or other document used in employee evaluations.
 4. Admissions Counselors and Admissions Managers and Directors' Matrices in effect on or after September 1, 1998 to the present.
 5. Student Status Report for all students from and after September 1, 1999 to the present. Such report should set forth the following on a fiscal year basis by location:
 - a. Total enrollments
 - b. Total number of students in each status tracked by UOP and WIU, including students who have the status "temporary drop"
 - c. Total number of students enrolled who have not attended in the sixty days prior to your response
 - d. Total number of students who have not attended for 180 days or more prior to your response
 6. Copies of any and all documents, from or after September 1, 1998 to the date of your response, including emails, memoranda, letters and any other correspondence addressing awards, bonuses or incentive compensation provided to any person or entity engaged in any student recruiting or admission activities, including, but not limited to; Sperling trip awards, gift certificates, trips, hotel stays provided to On Line recruiters in 2003 and electronic equipment
 7. Explanation of and full listing of all "lump sum" payments made from and after September 1, 1998 to the present, to any person or entity engaged in any student recruiting or admission activities.
 8. Please specifically explain the following lump sum amounts paid to the following employees, setting forth in your explanation the basis of such payment. Please also provide a copy of the full personnel file for each of the following employees:

Recruiter	Amount	Date
(b)(6)	(b)(6)	(b)(6)

Recruiter	Amount	Date
(b)(6)	(b)(6)	(b)(6)

9. Attached to this report as Appendix B is a list of UOP employees. In your response, provide a copy of the full personnel file, all evaluations and matrixes and all documents contained in the individuals' files maintained by the Corporate Operations Manager, (b)(6). Note: all employees identified in #8 above are also on Appendix B.
10. A copy of the Excel spreadsheets maintained by the Corporate Operations Manager, (b)(6), that sets forth recruiter salary and evaluation data for each recruiter, from September 1, 1999 through the date of your response. (Copies of two such spreadsheets, covering part of the 2003 Fiscal Year, entitled "Online Rep Comp 03.xls" and "On Ground REPCOMP 3.xls" were provided to the reviewers during the site visit.)

University of Phoenix Program Review Report
Appendix A: List of Recruiters Identified in Report

Reference #	Name	Location	Hire Date
1	(b)(6)	On Line	(b)(6)
2		Scal Fou and Diamond Bar	
3		Cen - Co	
4		Ncal - Bak	
5		Hou	
6		Cen - Tul	
7		Phx-Apo-All Companies	
8		SW - Las	
9		SW - Las	
10		SE - Jac	
11		NW - Utah, Sal	

Appendix B: List of Employees for Whom Personnel Records are to be Provided

No.	Name	Location	Hire Date	Exit Date
12	(b)(6)	Phx-Uop-Online Campus-3157	(b)(6)	(b)(6)
13	(b)(6)	Phx-Uop-Online Campus-3157	(b)(6)	
14	(b)(6)	Phx-Uop-Online Campus-3157	(b)(6)	
15	(b)(6)	Dun-Uop-Se-Atlanta Main & Jacksonville	(b)(6)	
16	(b)(6)	Dia-Uop-Scal-Diamond Bar	(b)(6)	
17	(b)(6)	Hou-Uop-Cen-Westside	(b)(6)	
18	(b)(6)	Phx-Apo-All Companies-4605	(b)(6)	
19	(b)(6)	Phx-Uop-Online Campus-3157	(b)(6)	
20	(b)(6)	Phx-Uop-Online Campus-3157	(b)(6)	
21	(b)(6)	Phx-Uop-Online Campus-3157	(b)(6)	
22	(b)(6)	Phx-Uop-Online Campus-3157	(b)(6)	
23	(b)(6)	On Line	(b)(6)	
24	(b)(6)	Phx-Uop-Online Campus-3157	(b)(6)	
25	(b)(6)	Bar-Uop-Se-Baton Rouge	(b)(6)	
26	(b)(6)	WU	(b)(6)	
27	(b)(6)	Lon-Uop-Cen-Co Main	(b)(6)	
28	(b)(6)	Phx-Uop-Online Campus-3157	(b)(6)	(b)(6)
29	(b)(6)	Tuc-Uop-Sw-Tucson	(b)(6)	
30	(b)(6)	Phx-Apo-All Companies-4605	(b)(6)	
31	(b)(6)	SW - Las Rancho	(b)(6)	
32	(b)(6)	Phx-Uop-Online Campus-3157	(b)(6)	(b)(6)
33	(b)(6)	Phx-Uop-Online Campus-3157	(b)(6)	
34	(b)(6)	Phx-Apo-All Companies & Scottsdale	(b)(6)	
35	(b)(6)	Nas-Se-Uop-Nashville Main	(b)(6)	
36	(b)(6)	Tem-Uop-Se-Tampa	(b)(6)	
37	(b)(6)	Phx-Apo-All Companies & On Line	(b)(6)	
38	(b)(6)	Phx-Uop-Online Campus-3157	(b)(6)	
39	(b)(6)	Phx-Uop-Online Campus-3157	(b)(6)	
40	(b)(6)	Bro-Uop-Mdw-Milwaukee	(b)(6)	
41	(b)(6)	Sal-Uop-Nw-Utah Main	(b)(6)	
42	(b)(6)	Phx-Uop-Online Campus-3157	(b)(6)	
43	(b)(6)	Pas-Uop-Scal-Pasadena	(b)(6)	
44	(b)(6)	Sou-Uop-Mdw-Detroit Main	(b)(6)	
45	(b)(6)	Phx-Uop-Online Campus-3157	(b)(6)	(b)(6)
46	(b)(6)	Phx-Uop-Online Campus-3157	(b)(6)	
47	(b)(6)	Phx-Uop-Online Campus-3157	(b)(6)	(b)(6)
48	(b)(6)	Phx-Uop-Online Campus-3157	(b)(6)	
49	(b)(6)	Wes-Uop-Cen-Westminster	(b)(6)	
50	(b)(6)	Phx-Uop-Online Campus-3157	(b)(6)	
51	(b)(6)	Phx-Uop-Online Campus-3157	(b)(6)	
52	(b)(6)	San-Uop-Cen-Santa Theresa	(b)(6)	
53	(b)(6)	Scal-Woodland Hills & Gardena	(b)(6)	(b)(6)

University of Phoenix Program Review Report
Appendix B, Page 2

No.	Name	Location	Hire Date	Exit Date
54	(b)(6)	Phx-Uop-Online Campus-3157	(b)(6)	
55		Chu-Uop-Scal-Chula Vista		
56		Sal-Uop-Nw-Utah Main		
57		Woo-Uop-Scal-Woodland Hills		
58		Phx-Uop-Online Campus-3157		
59		Phx-Uop-Online Campus-3157		
60		Woo-Uop-Scal-Woodland Hills		
61		Phx-Uop-Online Campus-3157		
62		Phx-Uop-Online Campus-3157		
63		Woo-Uop-Scal-Woodland Hills		
64		Phx-Uop-Online Campus-3157		
65		Phx-Uop-Online Campus-3157		
66		Phx-Apo-All Companies & On Line		
67		WIU		
68		Phx-Uop-Online Campus-3157		
69		Lon-Uop-Cen-Co Main		
70		San-Uop-Scal-San Bernardino		
71		Dia-Uop-Scal-Diamond Bar		
72		Nas-Se-Uop-Nashville Main		
73		Yum-Uop-Sw-Yuma		
74		Ont-Uop-Scal-Ontario		
75		Phx-Uop-Online Campus-3157		(b)(6)
76		Phx-Uop-Online Campus-3157		
77		Phx-Uop-Online Campus-3157		
78		Phx-Uop-Online Campus-3157		
79		Phx-Uop-Online Campus-3157		
80		Phx-Uop-Online Campus-3157		
81		Phx-Apo-All Companies		
82		Phx-Uop-Online Campus-3157		
83		Phx-Uop-Online Campus-3157		
84		Phx-Apo-All Companies		
85		Phx-Uop-Online Campus-3157		
86		Phx-Uop-Online Campus-3157		
87		Pla-Uop-Se-Plantation		
88		Phx-Uop-Online Campus-3157		
89		Puerto Rico		
90		Phx-Uop-Online Campus-3157		
91		Las-Uop-Sw-Rancho		
92		Phx-Uop-Online Campus-3157		
93		Phx-Uop-Online Campus-3157		(b)(6)
94		Phx-Uop-Online Campus-3157		
95		Phx-Uop-Online Campus-3157		(b)(6)

University of Phoenix Program Review Report
Appendix B, Page 3

No.	Name	Location	Hire Date	Exit Date
96	(b)(6)	Fou-Uop-Scal-Fountain Valley	(b)(6)	
97		Phx-Uop-Online Campus-3157		
98		Phx-Uop-Online Campus-3157		(b)(6)
99		Phx-Uop-Online Campus-3157		
100		Lon-Uop-Cen-Co Main		
101		Phx-Uop-Online Campus-3157		
102		WA ?		
103		Phx-Uop-Online Campus-3157		(b)(6)
104		Phx-Uop-Online Campus-3157		
105		Phx-Uop-Online Campus-3157		
106		Phx-Uop-Online Campus-3157		
107		Tul-Uop-Cen-Tulsa Main		(b)(6)
108		Phx-Uop-Online Campus-3157		
109		Phx-Uop-Online Campus-3157		
110		Pit-Uop-Ne-Pittsburgh Campus		(b)(6)
111		Tem-Uop-Se-Tampa		
112		Sou-Uop-Mdw-Detroit Main		(b)(6)
113		Phx-Apo-All Companies-4605		
114		Phx-Uop-Online Campus-3157		
115		Phx-Uop-Online Campus-3157		(b)(6)
116		Phx-Uop-Online Campus-3157		
117		Phx-Uop-Online Campus-3157		
118		Sal-Uop-Nw-Utah Main		(b)(6)
119		Phx-Uop-Online Campus-3157		
120		Phx-Uop-Online Campus-3137		
121		Way-Uop-Ne-Philadelphia Campus		(b)(6)
122		Scal - Fountain Valley & Pasadena		
123		Ok-Uop-Cen-Oklahoma City Main		
124		Phx-Uop-Online Campus-3157		
125		Phx-Uop-Online Campus-3157		
126		Phx-Uop-Online Campus-3157		(b)(6)
127		Gua-Uop-Se-Postal		
128		Phx-Uop-Online Campus-3157		(b)(6)
129		San-Uop-Scal-San Marcos		
130		Roc-Uop-Ne-Rockville		
131		Phx-Uop-Online Campus-3157		
132		Tuo-Uop-Sw-Tucson		
133		Phx-Uop-Online Campus-3157		
134		Phx-Uop-Online Campus-3157		
135		Phx-Uop-Online Campus-3157		(b)(6)

University of Phoenix Program Review Report
Appendix B, Page 4

No.	Name	Location	Hire Date	Exit Date
136	(b)(6)	Phx-Uop-Online Campus-3157	(b)(6)	
137		Phx-Uop-Online Campus-3157		
138		Phx-Uop-Online Campus-3157		(b)(6)
139		Phx-Uop-Online Campus-3157		
140		Phx-Uop-Online Campus-3157		
141		Phx-Uop-Online Campus-3157		
142		NW - Seattle & Sac-Rancho Cordova		
143		Phx-Uop-Online Campus-3157		
144		Phx-Apo-All Companies-4605		
145		Phx-Uop-Online Campus-3157		
146		Phx-Uop-Online Campus-3157		
147		Hou-Uop-Cen-Westside		
148		Phx-Uop-Online Campus-3157		
149		Phx-Uop-Online Campus-3157		
150		Phx-Uop-Online Campus-3157		
151		Phx-Uop-Online Campus-3157		
152		Way-Uop-Nc-Philadelphia Campus		
153		Phx-Uop-Online Campus-3157		
154		Phx-Uop-Online Campus-3157		
155		Phx-Uop-Online Campus-3157		
156		Phx-Uop-Online Campus-3157		(b)(6)
157		Phx-Apo-All Companies-4605		
158		Phx-Uop-Online Campus-3157		
159		Dal-Uop-Cen-Dallas Main Campus		
160		Sou-Uop-Mdw-Detroit Main		(b)(6)
161		Phx-Uop-Online Campus-3157		
162		Phx-Uop-Online Campus-3157		
163		Phx-Uop-Online Campus-3157		
164		Phx-Uop-Online Campus-3157		(b)(6)
165		Phx-Uop-Online Campus-3157		
166		Mai-Uop-Se-Orlando		
167		San-Uop-Ncal-San Francisco		(b)(6)
168		Phx-Uop-Online Campus-3157		
169		Phx-Apo-All Companies-4605		(b)(6)
170		Phx-Uop-Online Campus-3157		
171		Sea-Uop-Nw-Seattle Main Campus		
172		Phx-Uop-Online Campus-3157		
173		Phx-Uop-Online Campus-3157		
174		Phx-Uop-Online Campus-3157		
175		Phx-Apo-All Companies-4605		(b)(6)

University of Phoenix Program Review Report
Appendix B, Page 5

No.	Name	Location	Hire Date	Exit Date
176	(b)(6)	Sou-Uop-Mdw-Detroit Main	(b)(6)	
177	(b)(6)	Phx-Uop-Online Campus-3157	(b)(6)	
178	(b)(6)	Sch-Uop-Mdw-Chicago Main	(b)(6)	
179	(b)(6)	Tem-Uop-Se-Tampa	(b)(6)	
180	(b)(6)	Tul-Uop-Cen-Tulsa Main Campus	(b)(6)	
181	(b)(6)	Phx-Uop-Online Campus-3157	(b)(6)	
182	(b)(6)	San-Uop-Cen-Santa Theresa	(b)(6)	
183	(b)(6)	Phx-Uop-Online Campus-3157	(b)(6)	
184	(b)(6)	Way-Uop-Ne-Philadelphia Campus	(b)(6)	
185	(b)(6)	Phx-Uop-Online Campus-3157	(b)(6)	
186	(b)(6)	Col-Uop-Cen-Southern Co Campus	(b)(6)	
187	(b)(6)	Phx-Uop-Online Campus-3157	(b)(6)	
188	(b)(6)	Phx-Apo-All Companies-4605	(b)(6)	
189	(b)(6)	Phx-Uop-Online Campus-3157	(b)(6)	
190	(b)(6)	Jac-Uop-Se-Jacksonville	(b)(6)	
191	(b)(6)	Phx-Uop-Online Campus-3157	(b)(6)	
192	(b)(6)	Ont-Uop-Sca-Ontario	(b)(6)	
193	(b)(6)	Las-Uop-Sw-Rancho	(b)(6)	
194	(b)(6)	Phx-Uop-Online Campus-3157	(b)(6)	
195	(b)(6)	Sal-Uop-Nw-Utah Main Campus	(b)(6)	
196	(b)(6)	Lon-Uop-Cen-Co Main Campus	(b)(6)	
197	(b)(6)	Pla-Uop-Se-Plantation	(b)(6)	
198	(b)(6)	Lon-Uop-Cen-Co Main Campus	(b)(6)	
199	(b)(6)	Phx-Uop-Online Campus-3157	(b)(6)	
200	(b)(6)	Fou-Uop-Sca-Fountain Valley	(b)(6)	
201	(b)(6)	Tuc-Uop-Sw-Tucson	(b)(6)	
202	(b)(6)	Phx-Uop-Online Campus-3157	(b)(6)	
203	(b)(6)	Phx-Uop-Online Campus-3157	(b)(6)	
204	(b)(6)	Phx-Uop-Online Campus-3157	(b)(6)	
205	(b)(6)	Wal-Uop-Ncal-Walnut Creek	(b)(6)	
206	(b)(6)	Nov-Uop-Ncal-Novato	(b)(6)	
207	(b)(6)	Phx-Uop-Online Campus-3157	(b)(6)	
208	(b)(6)	Dal-Uop-Cen-Dallas Main Campus	(b)(6)	
209	(b)(6)	Phx-Uop-Online Campus-3157	(b)(6)	
210	(b)(6)	Sch-Uop-Mdw-Chicago Main	(b)(6)	
211	(b)(6)	Pro-Uop-Nw-Provo	(b)(6)	
212	(b)(6)	Phx-Uop-Online Campus-3157	(b)(6)	
213	(b)(6)	Phx-Uop-Online Campus-3157	(b)(6)	
214	(b)(6)	Fal-Uop-Sac-Fairfield	(b)(6)	
215	(b)(6)	Phx-Uop-Online Campus-3157	(b)(6)	

University of Phoenix Program Review Report
Appendix B, Page 6

No.	Name	Location	Hire Date	Exit Date
216	(b)(6)	Phx-Uop-Online Campus-3157	(b)(6)	
217		Phx-Uop-Online Campus-3157		(b)(6)
218		Phx-Uop-Online Campus-3157		
219		San-Uop-Scal-Rancho Bernardo		
220		Sac-Uop-Ncal-Creelside		
221		Phx-Uop-Online Campus-3157		
222		Phx-Uop-Online Campus-3157		
223		Way-Uop-Ne-Philadelphia Campus		(b)(6)
224		Sou-Uop-Mdw-Detroit Main		
225		Phx-Apo-All Companies-4605		
226		Wal-Uop-Ncal-Walnut Creek		
227		Dia-Uop-Scal-Diamond Bar		
228		Phx-Uop-Online Campus-3157		
229		Fre-Uop-Ncal-River Park		(b)(6)
230		Phx-Uop-Online Campus-3157		
231		Pit-Uop-Ne-Pittsburgh Campus		
232		Phx-Uop-Online Campus-3157		
233		Phx-Uop-Online Campus-3157		(b)(6)
234		Phx-Uop-Online Campus-3157		
235		Phx-Uop-Online Campus-3137		
236		Bar-Uop-Se-Baton Rouge		(b)(6)
237		Phx-Uop-Online Campus-3157		
238		Alb-Uop-Cen-Alb Main Campus		
239		Phx-Uop-Online Campus-3157		
240		Phx-Uop-Online Campus-3157		
241		Phx-Apo-All Companies-4605		(b)(6)
242		Phx-Uop-Online Campus-3157		
243		Phx-Uop-Online Campus-3157		
244		Mer-Uop-Nw-Boise Main Campus		
245		Phx-Uop-Online Campus-3157		
246		Hou-Uop-Cen-Westside		
247		Phx-Uop-Online Campus-3157		(b)(6)
248		Phx-Uop-Online Campus-3157		
249		Phx-Uop-Online Campus-3157		
250		Phx-Uop-Online Campus-3157		(b)(6)
251		Phx-Uop-Online Campus-3157		
252		Phx-Uop-Online Campus-3157		(b)(6)
253		Phx-Uop-Online Campus-3157		
254		SE - Atlanta and On Line		
255		Sea-Uop-Nw-Seattle Main Campus		

University of Phoenix Program Review Report
Appendix B, Page 7

No.	Name	Location	Hire Date	Exit Date
256	(b)(6)	Phx-Uop-Online Campus-3157	(b)(6)	(b)(6)
257	(b)(6)	Stl-Uop-Mdw-St. Louis Main	(b)(6)	(b)(6)
258	(b)(6)	Phx-Uop-Online Campus-3157	(b)(6)	(b)(6)
259	(b)(6)	Phx-Uop-Online Campus-3157	(b)(6)	(b)(6)
260	(b)(6)	Sou-Uop-Mdw-Detroit Main	(b)(6)	(b)(6)
261	(b)(6)	Phx-Uop-Online Campus-3157	(b)(6)	(b)(6)
262	(b)(6)	Phx-Uop-Online Campus-3157	(b)(6)	(b)(6)
263	(b)(6)	Phx-Uop-Online Campus-3157	(b)(6)	(b)(6)
264	(b)(6)	Phx-Uop-Online Campus-3157	(b)(6)	(b)(6)
265	(b)(6)	Tuc-Uop-Sw-Tucson	(b)(6)	(b)(6)
266	(b)(6)	Tig-Uop-Nw-Portland Main	(b)(6)	(b)(6)
267	(b)(6)	Phx-Uop-Online Campus-3157	(b)(6)	(b)(6)
268	(b)(6)	Dun-Uop-Se-Atlanta Main Campus	(b)(6)	(b)(6)
269	(b)(6)	San-Uop-Scal-San Marcos	(b)(6)	(b)(6)
270	(b)(6)	Phx-Uop-Online Campus-3157	(b)(6)	(b)(6)
271	(b)(6)	Phx-Uop-Online Campus-3157	(b)(6)	(b)(6)
272	(b)(6)	Sal-Uop-Nw-Utah Main Campus	(b)(6)	(b)(6)
273	(b)(6)	Phx-Apo-All Companies-4605	(b)(6)	(b)(6)
274	(b)(6)	Jac-Uop-Se-Jacksonville	(b)(6)	(b)(6)
275	(b)(6)	Tig-Uop-Nw-Portland Main	(b)(6)	(b)(6)
276	(b)(6)	Phx-Uop-Online Campus-3157	(b)(6)	(b)(6)
277	(b)(6)	Phx-Uop-Online Campus-3157	(b)(6)	(b)(6)
278	(b)(6)	Hon-Uop-Wes-Hawaii Main Campus	(b)(6)	(b)(6)
279	(b)(6)	Fou-Uop-Scal-Fountain Valley	(b)(6)	(b)(6)
280	(b)(6)	Phx-Uop-Online Campus-3157	(b)(6)	(b)(6)
281	(b)(6)	Bra-Uop-Ne-Boston Campus	(b)(6)	(b)(6)
282	(b)(6)	Phx-Apo-All Companies-4615	(b)(6)	(b)(6)
283	(b)(6)	Roc-Uop-Ne-Rockville	(b)(6)	(b)(6)
284	(b)(6)	San-Uop-Scal-San Bernardino	(b)(6)	(b)(6)
285	(b)(6)	Phx-Uop-Online Campus-3157	(b)(6)	(b)(6)
286	(b)(6)	Phx-Uop-Online Campus-3157	(b)(6)	(b)(6)
287	(b)(6)	Hon-Uop-Wes-Hawaii Main Campus	(b)(6)	(b)(6)
288	(b)(6)	Nov-Uop-Ncal-Novato	(b)(6)	(b)(6)
289	(b)(6)	Phx-Uop-Online Campus-3157	(b)(6)	(b)(6)
290	(b)(6)	Lat-Uop-Sac-Lathrop	(b)(6)	(b)(6)
291	(b)(6)	Sch-Uop-Mdw-Chicago Main	(b)(6)	(b)(6)
292	(b)(6)	Phx-Uop-Online Campus-3157	(b)(6)	(b)(6)
293	(b)(6)	Phx-Uop-Online Campus-3157	(b)(6)	(b)(6)
294	(b)(6)	Phx-Uop-Online Campus-3157	(b)(6)	(b)(6)
295	(b)(6)	Phx-Uop-Online Campus-3157	(b)(6)	(b)(6)

University of Phoenix Program Review Report
Appendix B, Page 8

No.	Name	Location	Hire Date	Exit Date
296	(b)(6)	Westminster & Tucson	(b)(6)	(b)(6)
297		Phx-Uop-Online Campus-3157		
298		Phx-Uop-Online Campus-3157		
299		Phx-Uop-Online Campus-3157		
300		Sea-Uop-Nw-Seattle Main Campus		
301		San-Uop-Cen-Santa Theresa		
302		Way-Uop-Ne-Philadelphia Campus		(b)(6)
303		Phx-Uop-Online Campus-3157		
304		Phx-Uop-Online Campus-3157		
305		Phx-Uop-Online Campus-3157		
306		Fre-Uop-Ncal-River Park		
307		Phx-Uop-Online Campus-3157		
308		Phx-Uop-Online Campus-3157		
309		Phx-Uop-Online Campus-3157		
310		Las-Uop-Sw-Rancho		
311		Pas-Uop-Scal-Pasadena		(b)(6)
312		Phx-Uop-Online Campus-3157		
313		Phx-Uop-Online Campus-3157		
314		Chu-Uop-Scal-Chula Vista		
315		Phx-Uop-Online Campus-3157		
316		Phx-Uop-Online Campus-3157		
317		Sea-Uop-Nw-Seattle Main Campus		
318		Fou-Uop-Scal-Fountain Valley		(b)(6)
319		Mal-Uop-Se-Orlando		
320		Phx-Uop-Online Campus-3157		
321		Orl-Uop-Se-South Orlando		(b)(6)
322		Phx-Uop-Online Campus-3157		
323		Phx-Uop-Online Campus-3157		
324		Phx-Uop-Online Campus-3157		
325		Phx-Uop-Online Campus-3157		(b)(6)
326		Liv-Uop-Ncal-Livermore		
327		Phx-Uop-Online Campus-3157		(b)(6)
328		Phx-Uop-Online Campus-3157		
329		Phx-Uop-Online Campus-3157		
330		Oak-Uop-Ncal-Oakland		(b)(6)
331		Hon-Uop-Wes-Hawaii Main Campus		
332		Phx-Uop-Online Campus-3157		
333		Sou-Uop-Mdw-Detroit Main Camp		(b)(6)
334		Phx-Apo-All Companies-4605		
335		Lon-Uop-Cen-Co Main Campus		

University of Phoenix Program Review Report
Appendix B, Page 9

No.	Name	Location	Hire Date	Exit Date
336	(b)(6)	Phx-Uop-Online Campus-3157	(b)(6)	
337		Tuo-Uop-Sw-Tucson		
338		Phx-Uop-Online Campus-3157		(b)(6)
339		Mal-Uop-Se-Orlando		
340		Phx-Apo-All Companies-4615		
341		Pla-Uop-Se-Plantation		
342		Pit-Uop-Na-Pittsburgh Campus		(b)(6)
343		Phx-Apo-All Companies-4615		
344		Phx-Uop-Online Campus-3157		
345		Sch-Uop-Mdw-Chicago Main Camp		
346		Phx-Uop-Online Campus-3157		
347		Ont-Uop-Scal-Ontario		
348		Phx-Uop-Online Campus-3157		(b)(6)
349		Phx-Uop-Online Campus-3157		
350		Phx-Uop-Online Campus-3157		
351		Old-Uop-Cen-Oklahoma City Main		(b)(6)
352		Cla-Uop-Nw-Clackamas		
353		Phx-Uop-Online Campus-3157		
354		Sal-Uop-Nw-Utah		
355		Gua-Uop-Se-Postal		
356		Met-Uop-Se-Louisiana		(b)(6)
357		Sac-Uop-Ncal-Creelside		
358		Phx-Uop-Online Campus-3157		
359		San-Uop-Scal-Kearny Mesa		
360		Phx-Uop-Online Campus-3157		(b)(6)
361		Sal-Uop-Nw-Utah Main Campus		
362		Stl-Uop-Mdw-St. Louis Main		
363		Fre-Uop-Ncal-River Park		(b)(6)
364		Phx-Uop-Online Campus-3157		
365		Way-Uop-Na-Philadelphia Campus		
366		Phx-Uop-Online Campus-3157		
367		Fou-Uop-Scal-Fountain Valley		(b)(6)
368		Phx-Uop-Online Campus-3157		
369		Phx-Uop-Online Campus-3157		
370		San-Uop-Ncal-San Francisco		(b)(6)
371		Phx-Uop-Online Campus-3157		
372		Phx-Uop-Online Campus-3157		
373		Phx-Uop-Online Campus-3157		(b)(6)
374		Phx-Uop-Online Campus-3157		
375		Bra-Uop-Na-Boston Campus		

University of Phoenix Program Review Report
Appendix B, Page 10

No.	Name	Location	Hire Date	Exit Date
376	(b)(6)	Tem-Uop-Se-Tampa	(b)(6)	(b)(6)
377	(b)(6)	San-Uop-Cen-Santa Theresa	(b)(6)	
378	(b)(6)	Pla-Uop-Se-Plantation	(b)(6)	(b)(6)
379	(b)(6)	Phx-Uop-Online Campus-3157	(b)(6)	
380	(b)(6)	Phx-Uop-Online Campus-3157	(b)(6)	
381	(b)(6)	Phx-Uop-Online Campus-3157	(b)(6)	
382	(b)(6)	Wal-Uop-Ncal-Walnut Creek	(b)(6)	
383	(b)(6)	Phx-Uop-Online Campus-3157	(b)(6)	
384	(b)(6)	Phx-Uop-Online Campus-3157	(b)(6)	(b)(6)
385	(b)(6)	Phx-Apo-All Companies-4605	(b)(6)	
386	(b)(6)	Pla-Uop-Se-Plantation	(b)(6)	
387	(b)(6)	Phx-Uop-Online Campus-3137	(b)(6)	(b)(6)
388	(b)(6)	Phx-Apo-All Companies-4605	(b)(6)	
389	(b)(6)	Sou-Uop-Mdw-Detroit Main	(b)(6)	(b)(6)
390	(b)(6)	Phx-Uop-Online Campus-3157	(b)(6)	
391	(b)(6)	San-Uop-Cen-Santa Theresa	(b)(6)	
392	(b)(6)	Phx-Uop-Online Campus-3157	(b)(6)	
393	(b)(6)	Phx-Uop-Online Campus-3157	(b)(6)	
394	(b)(6)	Phx-Uop-Online Campus-3157	(b)(6)	
395	(b)(6)	Phx-Uop-Online Campus-3157	(b)(6)	(b)(6)
396	(b)(6)	Phx-Uop-Online Campus-3157	(b)(6)	
397	(b)(6)	Phx-Uop-Online Campus-3157	(b)(6)	
398	(b)(6)	Tul-Uop-Cen-Tulsa Main Campus	(b)(6)	(b)(6)
399	(b)(6)	Bar-Uop-Se-Baton Rouge	(b)(6)	
400	(b)(6)	Phx-Uop-Online Campus-3157	(b)(6)	
401	(b)(6)	Phx-Uop-Online Campus-3157	(b)(6)	(b)(6)
402	(b)(6)	Phx-Uop-Online Campus-3157	(b)(6)	
403	(b)(6)	Phx-Uop-Online Campus-3157	(b)(6)	
404	(b)(6)	Phx-Uop-Online Campus-3157	(b)(6)	
405	(b)(6)	Phx-Uop-Online Campus-3157	(b)(6)	(b)(6)
406	(b)(6)	Spo-Uop-Nw-Spokane Campus	(b)(6)	
407	(b)(6)	Phx-Uop-Online Campus-3157	(b)(6)	
408	(b)(6)	Phx-Uop-Online Campus-3157	(b)(6)	(b)(6)
409	(b)(6)	Phx-Uop-Online Campus-3157	(b)(6)	
410	(b)(6)	Lon-Uop-Cen-Co Main Campus	(b)(6)	
411	(b)(6)	Jac-Uop-Se-Jacksonville	(b)(6)	
412	(b)(6)	Phx-Uop-Online Campus-3157	(b)(6)	
413	(b)(6)	Phx-Uop-Online Campus-3157	(b)(6)	
414	(b)(6)	Mal-Uop-Se-Orlando	(b)(6)	(b)(6)
415	(b)(6)	Fou-Uop-Seal-Fountain Valley	(b)(6)	

University of Phoenix Program Review Report
Appendix B, Page 11

No.	Name	Location	Hire Date	Exit Date
416	(b)(6)	Phx-Apo-All Companies-4605	(b)(6)	
417		Phx-Uop-Online Campus-3157		
418		Mel-Uop-Se-Louisiana		(b)(6)
419		Phx-Apo-All Companies-4605		
420		Phx-Uop-Online Campus-3157		(b)(6)
421		Tuc-Uop-Sw-Tucson		
422		San-Uop-Ncal-San Jose		(b)(6)
423		Phx-Uop-Online Campus-3157		
424		Phx-Uop-Online Campus-3157		
425		Phx-Uop-Online Campus-3157		
426		Phx-Uop-Online Campus-3157		
427		Phx-Uop-Online Campus-3157		
428		Phx-Uop-Online Campus-3157		
429		Oak-Uop-Ncal-Oakland		
430		Phx-Uop-Online Campus-3157		(b)(6)
431		Pit-Uop-Nc-Pittsburgh Campus		
432		Phx-Uop-Online Campus-3157		
433		Fre-Uop-Ncal-River Park		
434		Way-Uop-Nc-Philadelphia Campus		
435		Phx-Uop-Online Campus-3157		(b)(6)
436		Phx-Uop-Online Campus-3157		
437		Phx-Uop-Sw-Alhwaakee		
438		Phx-Uop-Online Campus-3157		
439		Phx-Uop-Online Campus-3157		
440		Phx-Uop-Online Campus-3157		
441		Phx-Uop-Online Campus-3157		(b)(6)
442		Phx-Uop-Online Campus-3157		
443		Tul-Uop-Cen-Tulsa Main Campus		(b)(6)
444		Phx-Uop-Online Campus-3157		
445		Phx-Uop-Online Campus-3157		
446		Phx-Uop-Online Campus-3157		
447		Phx-Uop-Online Campus-3157		(b)(6)
448		Roc-Uop-Nc-Rockville Lc		
449		Tig-Uop-Nw-Portland Main		
450		Phx-Uop-Online Campus-3157		
451		San-Uop-Scal-Del Mar		(b)(6)
452		Ind-Uop-Mdw-Cleveland Main		
453		Phx-Uop-Online Campus-3157		
454		Phx-Uop-Online Campus-3157		