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WASHINGTON UPDATE

JANUARY 2017

DeVos Hearing Delayed Until January 17th

On January 9, 2017, Senators Lamar Alexander (R-TN) and Patty Murray (D-WA), the Chair and Ranking Member of the Senate Committee on Health, Education, Labor and Pensions (HELP), released a joint statement announcing the delay of the confirmation hearing for Betsy DeVos, the nominee for the Secretary of Education, until Tuesday, January 17, 2017.

In a separate statement, Senator Alexander said that the delay "will not change our plans to vote on the nomination of Betsy DeVos on Tuesday, January 24, 2017." An aide to Senator Murray was reported to have said that the Senator "is hopeful that this additional time will allow Ms. DeVos to complete the required ethics paperwork in time for the Office of Government Ethics to submit to the HELP Committee before the hearing, just as every single one of President Obama's nominees did and as Leader McConnell demanded eight years ago."

On January 9, 2017, Senator Elizabeth Warren (D-MA) sent a 16-page letter to Betsy DeVos outlining her questions that she planned to ask at the confirmation hearing. Senator Warren said she was "deeply troubled" by Ms. DeVos' "seemingly nonexistent record on higher education." The Senator also questioned whether Ms. DeVos would continue the Obama Administration's "recent record of protecting students and taxpayers from fraudulent for-profit colleges." She also wants Ms. DeVos' views on debt relief for defrauded student loan borrowers, efforts to allow banks back into the student loan system, and reforms to student loan servicing.

A copy of the Senator's letter is available at: http://www.warren.senate.gov/files/documents/2017-01-09_Betsy_DeVos_Letter.pdf.

Federal Judge Denies ACICS' Request to Block Department of Education's Decision to Terminate the Recognition of ACICS; Preliminary Injunction Hearing Set for February 1, 2017

On December 20, 2016, U.S. Federal Judge Reggie B. Walton denied the request by the Accrediting Council for Independent Colleges and Schools (ACICS) to block the Department of Education's December 12, 2016 decision to uphold the decision of the Senior Department Official (SDO) Emma Vadehra to terminate the recognition of ACICS. On September 22, 2016, the SDO concluded that ACICS was noncompliant with numerous regulatory criteria for departmental recognition and terminated ACICS' recognition. The Secretary of Education agreed with the decision and chose not to continue ACICS' recognition. The Secretary also concluded that ACICS could not come into compliance within 12 months or less.

Judge Walton ordered the Department to file the administrative record by January 20, 2017 and set a preliminary injunction hearing for February 1, 2017.

A copy of the Secretary of Education's decision is found at: http://www2.ed.gov/documents/acics/final-acics-decision.pdf.

ACICS filed its lawsuit against the Department of Education on December 15, 2016, seeking to regain its recognition. In a written statement, Roger Williams, Interim President, said: "ACICS has acknowledged its shortcomings and worked diligently to correct them so that, together with ACICS-accredited institutions, we can continue to work to help students achieve their academic and career goals."

Both John Kline (R-MN), Chairman of the House Committee on Education and the Workplace, and Congresswoman Virginia Foxx (R-NC), incoming Chair of the House Committee on Education and the Workplace, issued statements on the decision.

> Chairman Kline said: "The Department's decision will disrupt the education of students across the country, and it will hurt low-income and minority students the most. There was another path that would have protected taxpayers and students, without disrupting hundreds of thousands of lives. Unfortunately, the Secretary decided not to follow it. While Secretary King's decision is certainly unprecedented, it comes as no surprise. This administration has led a continued and coordinated attack on career colleges and universities with little regard for the consequences of its actions."
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> Chairman-designate Foxx said: "The Secretary's decision will hurt hundreds of thousands of students who have been working hard to earn a postsecondary education, and those students will find themselves in an incredibly difficult situation. We should have never reached this point. It's clear accreditation is something we need to look at more closely as we work to improve our nation's higher education system. The accreditation process must provide students and taxpayers the highest degree of accountability, and that includes identifying and correcting concerns before hundreds of thousands of students are harmed."

A copy of the Kline and Foxx statements is found at:
http://edworkforce.house.gov/news/documentsingle.aspx?DocumentID=401171.

Steve Gunderson, President and CEO of CECU, issued a statement that said: "No Administration has politicized education or accreditation like the current one. Since the November election, the Department has forcibly shutdown two colleges, released faulty and biased gainful employment data, and attached overly burdensome and stringent conditions on the sale of a major institution to new owners."

A copy of the CECU statement is found at: http://www.career.org/news/cecu-statement-on-departments-acics-decision.

The Department issued a press release on December 12, 2016, stating that the Department will inform colleges accredited by ACICS of additional operating conditions required for continued participation in the federal student aid programs. Colleges accredited by ACICS will be provisionally certified and will have 18 months to find a new accreditor or risk losing access to federal student aid programs. The ACICS-accredited institutions will have to comply with additional conditions that are designed to protect students and safeguard taxpayer dollars. These conditions include additional monitoring, transparency, oversight, and accountability measures.

The December 12, 2016 press release is found at: http://www.ed.gov/news/press-releases/education-department-establishes-enhanced-federal-aid-participation-requirements-acics-accredited-colleges.

A "Summary of Selected Requirements for Institutions Accredited by ACICS" describes the additional conditions that institutions must abide by during the term of the provisional PPAs, which include submitting a teach-out plan to the Department within 30 days after ACICS' loss of recognition; having an "In-Process Application" with another accrediting agency within 90 days of the Secretary's final decision; and engaging their auditors to evaluate key data and compliance indicators normally monitored by the accrediting agency. The Summary is found at: http://www2.ed.gov/documents/acics/ppa-provisions.pdf.

An updated blog post was issued by the Department of Education on December 12, 2016, which describes "What College Accreditation Changes Mean for Students." The blog includes a series of questions and answers for students. It is found at: http://blog.ed.gov/2016/12/college-accreditation-update/. In addition, another blog issued by the Department of Education on December 12, 2016, advises students what the loss of federal recognition means, and is found at: http://blog.ed.gov/2016/12/letter-to-acics-students/.

Department of Education Releases Final Debt-to-Earnings Rates for Gainful Employment

On January 9, 2017, the Department of Education released the first debt-earnings (D/E) rates. According to the press release issued on January 9th, Secretary of Education John B. King Jr. said: "These rates shed a bright light on which career training programs are most likely to prepare students for repaying their student loan debt, and which programs might leave them worse off than when they started."

Under 34 CFR 668.404, a gainful employment (GE) program passes the D/E rates measure if its annual earnings rate is less than or equal to 8 percent or its discretionary income rate is less than or equal to 20 percent. A GE program fails the D/E rates measure if its annual earnings rate is greater than 12 percent and its discretionary income rate is greater than 30 percent. The press release asserted that over 800 programs failed the D/E rates measure. Ninety-eight percent of the failing programs are offered by for-profit colleges and schools. An additional 1,239 programs received a "zone" rate, with an annual loan repayment rate that is between 20 and 30 percent of discretionary income or between 8 and 12 percent of total earnings.

A copy of the press release is found at: https://www.ed.gov/news/press-releases/education-department-releases-final-debt-earnings-rates-gainful-employment-programs.

Included in the press release is a link to the Federal Student Aid Data Center, which makes available to the public the final D/E rates: https://studentaid.ed.gov/sa/about/data-center/school/ge.

Earlier, on January 6, 2017, the Department released 2 Electronic Announcements which provide information on the backup data (#100) and information on alternate earnings appeals for D/E rates and warnings for failing programs. Electronic Announcement #100 is found at: https://ifap.ed.gov/eannouncements/010617GEEA100UpcomingRelFinalGEDebttoEarnRates.html, and Electronic Announcement is found at: https://ifap.ed.gov/eannouncements/010617GEAnn101AddtlInfoAltEarnAppealsDERates.html.

Department Publishes State Authorization Rule

On December 19, 2016, the Department of Education published in the *Federal Register* its final rule on state authorization requirements for institutions offering distance education and correspondence courses. Currently, institutions must have state authorization in states where they are physically located. The new rule, which takes effect July 1, 2018, addresses what the Department considered a "loophole" in the program integrity rules governing eligibility to participate in the federal student aid programs. The new rule requires institutions offering distance education or correspondence courses to be authorized by each state in which the institution enrolls students, *if such authorization is required by the state*. The regulation recognizes authorization through participation in a state authorization reciprocity agreement, as long as the agreement does not prevent a state from enforcing its own laws.

The final rule also requires institutions to document the state process for resolving student complaints regarding distance education programs. In addition, institutions will also be required to make public and individualized disclosures to enrolled and prospective students in distance education programs, including adverse actions against the school, the school's refund policies, and whether each program meets applicable state licensure or certification requirements. The rule also addresses eligibility of foreign branch campuses.

A copy of the press release is found at: http://www.ed.gov/news/press-releases/education-department-announces-final-rule-state-authorization-postsecondary-distance-education-foreign-locations.

A copy of the final regulations is found at: https://ifap.ed.gov/fregisters/attachments/FR121916.pdf.

Given that the effective date of the rule is July 18, 2018, many believe (or hope) that this rule may be eliminated by the Trump administration.

Secretary King Delivers Exit Memo

On January 5, 2017, Secretary of Education John B. King, Jr. delivered his exit memo, "Giving Every Student a Fair Shot: Progress Under the Obama Administration's Education Agenda" to the President. The document outlines the Department's progress and lays out the framework for sustaining that progress. Notable progress was made in the areas of the best high school graduation rate in history (83 percent), greater access to preschool, and more rigorous standards that prepare all young people for success in college and careers.

One of the highlighted areas was that the Obama Administration has remained steadfast in its commitment to college access, affordability, and completion. The exit memo noted that by ending the student loan subsidies to private banks, $60 billion in savings was shifted back to students and taxpayers. In addition, that change allowed the Administration to increase the maximum Pell Grant award by over $1,000, while tying it to inflation for the first time ever. In addition, the President's American Opportunity Tax Credit provides up to $10,000 for four years of college tuition and will cut taxes by over $1,800, on average, for almost 10 million families in 2016. The Department also took major steps to help students obtain financial aid by making the FAFSA easier and faster to complete and by enabling people to apply earlier, starting in October, rather than January. In addition, the Department's Financial Aid Shopping Sheet and the new College Scorecard give students and families timely and reliable information about college. By keeping student loan interest rates low, a typical student saves over $1,000 over the life of his/her loans. Finally, "through landmark gainful employment regulations, the Department is holding low-performing career colleges accountable for their results. The Department has strengthened accreditation, the quality stamp of approval that colleges need before accessing federal financial aid. And the agency is ensuring that borrowers who have been harmed by their school's misconduct can seek debt relief, while protecting tax payers by holding schools that mislead and defraud students accountable for the cost of that debt relief."

A copy of the exit memo is found at: https://www2.ed.gov/documents/press-releases/cabinet-exit-memo.pdf.

Undersecretary Mitchell Describes the Progress Made in Education in Farewell Address

On January 12, 2017, Undersecretary Ted Mitchell delivered his farewell address at Northeastern University and described the progress made in higher education, including a million more African Americans and Hispanic students are in college today than eight years ago, a record number of students have Pell Grants, and the number of new defaults on student loans is trending down.

Undersecretary Mitchell said the future of higher education will "likely include new education and business models for today's institutions, and the emergence of new educational providers of high-quality learning." He noted that to meet the needs of our students, "we'll need to develop institutions, systems, and infrastructure to support new ways of teaching, learning, and assessment."

Much of Mr. Mitchell's address focused on innovation as a way forward for higher education and the need to "focus on student outcomes, hold institutions accountable, and scale up only those innovations that make a real difference for students."

A copy of Undersecretary Mitchell's address is found at: http://static.politico.com/ee/3e/285b8ddf4eceae0dd61a3e3d818a/excerpts-of-undersecretary-of-education-ted-mitchells-final-speech.pdf.

Department Reports that Many For-Profit Schools Could Exceed the 90/10 Rule if Post 9/11 GI Bill and DoD Benefits are Added to Title IV Aid in the Calculation

On December 21, 2016, the Department of Education released an analysis that found that many for-profit institutions would likely exceed the 90/10 rule if revenue from the Post 90/10 GI Bill benefits and the Department of Defense Tuition Assistance programs were included in the 90/10 calculation. Under current rules, 17 schools were determined to have exceeded the 90/10 rule. However, when the Post 90/10 GI Bill benefits and the Department of Defense Tuition Assistance benefits are added to the 90/10 calculation, almost 200 schools would violate the 90/10 rule. President Obama's FY 2017 budget proposal, released on February 9, 2016, recommended including all Federal educational aid programs, including Post 90/10 GI Bill and Department of Defense Tuition Assistance benefits, in the calculation, and decreasing the percentage of funds at proprietary institutions that can come from federal funds from 90 percent back to 85 percent. If the threshold was lowered, the analysis shows that the number of failing schools in a single year would increase from 17 to 563 schools.

A copy of the press release is found at: http://www.ed.gov/news/press-releases/new-analysis-finds-many-profits-skirt-federal-funding-limits. It includes the link to the 90/10 analysis.

Department Releases Quarterly Student Aid Data Updates and a Preliminary Report on the Federal Student Aid Feedback System

On December 20, 2016, the Department of Education's Federal Student Aid (FSA) posted a series of updates to its data center, a collection of key performance data related to the federal student aid portfolio. The information in the FSA Data Center includes reports on the loan portfolio managed by the Department. For example, the outstanding portfolio of federal student loans is $1.29 trillion, 81 percent of which consists of Direct Loans and federally-owned FFELP Loans.

The Department also released a preliminary report about the FSA feedback system, which was launched in July 2016 to fulfill one of the primary objectives of President Obama's Student Aid Bill of Rights (SABOR). Between April 11, 2016 and September 30, 2016, FSA received 4,811 comments, which were a combination of complaints, positive feedback, and allegations of suspicious activity. More than 75 percent of the submissions were complaints, which covered issues related to their experience with the federal student aid process, including applying for and receiving federal loans, grants, and work study; federal loan servicing; the collection of defaulted federal loans; and schools' administration of federal student aid programs. The top ten most frequently submitted subcategories included: student eligibility; delays receiving aid; school quality of education; completing the FAFSA; school closure; loan discharge, cancellation or forgiveness; school-owed student money (credit balance/refund); FSA ID; loan disbursement (pay out) process; and FAFSA verification. About 11 percent of the complaints were related to student loan servicing.

A copy of the press release that announces the posted data updates and the release of the preliminary report is found at: http://www.ed.gov/news/press-releases/education-department-posts-quarterly-student-aid-data-updates-and-releases-preliminary-report-federal-student-aid-feedback-system.

The Electronic Announcement announcing the posted updates and release of the preliminary report is found at: https://ifap.ed.gov/eannouncements/122016FSAPostsUpdatedReportstoFSADataCenter.html.

ED Ends Federal Student Aid Participation for Charlotte School of Law

On December 19, 2016, the Department of Education announced that as of December 31, 2016, it will end all federal student financial aid for Charlotte School of Law (CSL), a for-profit member institution in the InfiLaw System. The Department said that CSL failed to meet accreditation standards and misled prospective students about their chances of passing the bar exam. The ABA placed CSL on probation on November 14, 2016, citing the school's non-compliance with several of its standards, and the Department said that CSL did not inform current and prospective students when the ABA told the school that it was out of compliance with accreditor's standards.

A copy of the Department's press release is found at: http://www.ed.gov/news/press-releases/charlotte-school-law-denied-continued-access-federal-student-aid-dollars.

ED Ends Federal Student Aid Participation for Globe University and Minnesota School of Business

On December 6, 2016, the Department of Education announced that it would end the participation in student aid for Globe University and Minnesota School of Business (MSB), two institutions under common ownership. The Program Compliance and Enforcement Units within Federal Student Aid (FSA) determined that the two institutions are ineligible to participate in federal student aid programs because Globe University and MSB have been judicially determined to have committed fraud involving Title IV program funds. The announcement also stated that both institutions "knowingly misrepresented the nature of their criminal justice programs and the transferability of credits earned to other institutions."

Over the last three fiscal years, the Department has denied recertification applications for more than 30 institutions.

A copy of the Department's press release is found at: http://www.ed.gov/news/press-releases/globe-university-minnesota-school-business-denied-access-federal-student-aid-dollars.

FSA Restores Pell Grant Eligibility for Students Who Attended Closed Schools

In a December 21, 2016 Electronic Announcement, the Department of Education announced that it has determined that it has the authority to restore semesters of Pell Grant eligibility for Pell Grant recipients who were unable to complete their course of study due to the closing of their school. The Department is in the process of modifying its systems to implement the restoration of Pell Grant eligibility for students who received Pell Grant funds for attendance at a now closed school. The first phase is expected to be completed by March 2017. Once the first phase is completed, the Department will conduct outreach to affected students.

A copy of the Electronic Announcement is found at:
https://ifap.ed.gov/eannouncements/122116FedPellGrantRestoratforStudentsWhoAttendClosedSchools.html.

ED Announces Delay in Releasing the 2017 GE Disclosure Template and Applicable Deadlines

On December 16, 2016, the Department of Education released Electronic Announcement #99 to inform the higher education community of a delay in the release of the 2017 Gainful Employment (GE) Disclosure Template and to provide guidance on how this delay affects institutions' efforts to comply with the GE regulations related to GE disclosures and student warnings. The 2017 GE Template is not expected to be released until the end of January 2017. Once the Department releases the 2017 GE Template, institutions will have at least 60 days to be in compliance with the regulatory posting and dissemination requirements. Institutions are advised that they should continue to include their existing 2016 GE Disclosure Templates in all promotional materials made available to prospective students, and continue to display the templates on the institution's websites. Deadlines and dissemination requirements are also described in the Electronic Announcement.

A copy of Electronic Announcement #99 is found at:
https://ifap.ed.gov/eannouncements/121616GEAnnounce99DelayRel2017GEDiscTempandDeadlines.html.

Department Announces Participants In Loan Counseling Pilot Program

On December 15, 2016, the Department of Education announced a new experiment to identify promising loan counseling practices that can help students make the right decisions about borrowing student loans and to help colleges find ways to counsel students to reduce unnecessary loan borrowing. Fifty-one colleges and universities were selected to participate in the experiment that will require additional loan counseling beyond what is already mandated by federal law, one-time entrance and exit counseling.

The Department also released a toolkit that highlights promising practices from a dozen schools that are increasing college completion rates for students on their campuses.

A copy of the press release is found at: http://www.ed.gov/news/press-releases/us-department-education-announces-loan-counseling-experiment-and-new-college-completion-toolkit.

OIG Releases its Annual Report

On November 16, 2016, the Office of Inspector General (OIG) released its annual report that outlines the areas its investigators and analysts will focus in the coming year. The first four goals focus on promoting the economy, efficiency, and effectiveness and preventing and detecting waste, fraud, and abuse. The fifth goal focuses on the internal functions of the OIG. The specific goals are:

- Improve the Department's ability to effectively and efficiently implement its programs;
- Strengthen the Department's efforts to improve the delivery of student financial assistance;
- Protect the integrity of the Department's programs and operations;
- Contribute to improvements in Department business operations; and
- Strive for diverse and skilled workforce that is provided with the means and assistance necessary to achieve the OIG's mission.

Within these goals, the OIG plans to target:

- The Department's oversight of state special education programs;
- The Department's management of financial aid pilot projects through its experimental sites authority;
- The Department's effectiveness of how it evaluates college accreditors; and
- Whether the Department appropriately resolves student loan complaints.

A copy of the annual report is found at: http://www2.ed.gov/about/offices/list/oig/misc/wp2017.pdf.

GAO Report Shows that More than 100,000 Americans Have Their Social Security Benefits Garnished to Repay Student Debt

On December 19, 2016, the Government Accountability Office (GAO) released a report titled, "Social Security Offsets: Improvements to Program Design Could Better Assist Older Student Loan Borrowers with Obtaining Permitted Relief," that found that 114,000 Americans aged 50 or older have had their Social Security benefits garnished over the past year due to outstanding student loan debt. The GAO report (GAO-17-45) found that as a result of the garnishment, thousands of retirees and disabled individuals are now living below the poverty line. The report said that of those who were 50 and older at the time of their Social Security garnishment, 43 percent had their student loans for 20 years or more. More than 75 percent of these borrowers took out the loans for their own education and not to pay for a family member to go to college. The report also found that of the approximately $1.1 billion collected through Social Security garnishments from 2001 to 2015 budget years, 70 percent was applied to fees and interest and not the principal owed.

A copy of the GAO report is found at: http://www.gao.gov/products/GAO-17-45.

Biden Calls on Colleges and Universities to "Step Up on Sexual Assault"

On January 5, 2017, Vice President Joe Biden released a letter to college and university presidents and chancellors on how to combat sexual assault on campuses. Vice President Biden wrote: "As presidents, chancellors, deans, and administrators, you have an obligation to stand up, to speak out, and to foster the safest and most inclusive environment possible for every student that walks onto your campuses." Mr. Biden recommended steps that colleges and universities have been using to improve their procedures, such as regular climate surveys, fair investigations, and the designation of a Title IX coordinator. He concluded by stating: "At the end of the day, it's about creating an environment where all students are treated with dignity and respect; where men and women feel empowered to step up and speak out against sexual violence; and where survivors of sexual assault no longer feel ashamed to come forward and ask for help they desperately want and deserve."

A copy of Vice President Biden's letter is found at: https://medium.com/@VPOTUS/a-call-to-action-for-college-and-university-presidents-chancellors-and-senior-administrators-52865585c76d#.yet290zeb.

Report Shows that Higher Education Tax Credits Lead to Few Results

A recent report by the National Bureau of Economic Research (NBER) titled, "The Returns to the Federal Tax Credits for Higher Education" finds higher education tax credits have no causal effects on college-going behavior. While many more families were eligible for a higher education tax credit since the introduction of the American Opportunity Tax Credit (AOTC), and while there were many more claimants, there is no effect on college outcomes, such as whether students enrolled in college or what tuition prices they paid. In fact, there is no evidence to show that the tax credits encourage students to attend schools with higher tuition.

The expansion also significantly increased the cost of tax credits to $23 billion in 2014, an increase of 177 percent from 2008. Some have argued that education benefits administered through the tax system are poorly timed because students and families must pay tuition and fees before they can claim tax benefits as opposed to spending programs, like Pell Grants, which are designed to provide assistance when the money is needed, which is at the time of enrollment.

A copy of the report is available at: http://www.nber.org/papers/w20833.

ABA Sues Department of Education Over the Public Service Loan Forgiveness Program

On December 20, 2016, *Politico* reported that the American Bar Association (ABA) is suing the Department of Education claiming that ED reneged on promises to forgive student loans for four public service lawyers. The lawsuit claims that the four attorneys took low-paying public-service jobs expecting that their loans would be forgiven under the Public Service Loan Forgiveness program. The program discharges student loan debt for borrowers who worked in public service jobs and made regular payments for ten years. Nine years into the program, the lawsuit alleges that the Department advised the borrowers that they did not qualify. Three out of the four lawyers received verification from the Department that their jobs qualified under the program and the fourth lawyer claimed she qualified because she worked for a nonprofit agency that the Department had previously certified as qualifying for the program.

CFPB Releases Student Loan Fact Sheet for Service Members and Veterans

The Consumer Financial Protection Bureau (CFPB) released “Tackling Student Loan Debt,” which provides information for service members and veterans about their options for repaying their student loans. The guide includes information on the Service Members Civil Relief Act interest rate reduction and Public Service Loan Forgiveness.

A copy of the guide is found at: http://files.consumerfinance.gov/f/201405_cfpb_servicemember-student-loan-guide.pdf.

The College Board Releases Report on Benefits of Higher Education

According to a report released on January 11, 2017, by The College Board, titled, “Education Pays 2016: The Benefits of Higher Education for Individuals and Society,” it takes an average of 12 years to recoup the cost of obtaining a Bachelor’s degree. The data also showed that college graduates with a full-time job earned an average of 67 percent more than high school graduates last year. In addition, individuals with higher education earn more, pay more taxes, and are more likely than others to be employed and have job benefits such as retirement and health insurance. The report also found that adults with more education are more likely to move up the economic ladder and less likely to rely on public assistance. In addition, the report found a correlation between education and health outcomes, community involvement, and indicators of the well-being of the next generation.

A copy of the report is found at: https://trends.collegeboard.org/sites/default/files/education-pays-2016-full-report.pdf.

Students at For-Profit Institutions Achieve Similar Learning Results of Those Who Attend For-Profit Institutions

According to a new study titled, "CLA+ Proprietary vs. Non-Proprietary Report," by the Council for Aid to Education, students at for-profit institutions achieve learning results that are similar to those of students attending comparable nonprofit institutions. Using its Collegiate Learning Assessment, the Council measured learning outcomes in six areas for 624 students from four for-profit institutions and compared the scores with those of a matched group of students from 20 public and private institutions. "In all six comparisons, students at proprietary institutions outperformed the students at the nonproprietary comparison institution. However, in all but one case, the difference in mean scores is too small to be considered statistically significant."

A copy of the study is found at: http://cae.org/images/uploads/pdf/CLA_Proprietary_Vs_Non-Proprietary_Report.pdf.

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