



Board of Governors

Joan Harrington, Chair
Santa Clara University
School of Law

Fred W. Alvarez
Jones Day

Alina Ball
UC Hastings College of the Law

Barbara J. Chisholm
Altshuler Berzon LLP

Martin R. Glick
Arnold & Porter LLP

Bruce Ives
LifeMoves

Dolores Jimenez
Kaiser Permanente

Leo P. Martinez
UC Hastings College of the Law

Anita D. Stearns Mayo
Pillsbury Winthrop Shaw Pittman
LLP

Robert H. Olson
Squire Patton Boggs (retired)

Rohit K. Singla
Munger, Tolles & Olson LLP

Abdi Soltani
ACLU of Northern California

Staff

Guillermo Mayer
President & CEO

John T. Affeldt
Richard A. Marcantonio
Managing Attorneys

Isabel Alegría
Director of Communication

Liz Guillen
Director of Legislative
& Community Affairs

Deborah Harris
Director of Development

Sumi Paik
Director of Finance &
Administration

Angelica K. Jongco
Samuel Tepperman-Gelfant
Senior Staff Attorneys

Rigel S. Massaro
Chelsea Tu
David Zisser
Staff Attorneys

Anne Bellows
Attorney & Equal Justice Works
Fellow

Angela Perry
Law Fellow

Patty Leal
Finance Manager

Karem Herrera
Legal Administrative Coordinator

Madelyn Wargowski
Development & Administrative
Assistant

Jesse White
Communication Coordinator

February 16, 2016

Sent via electronic mail

Joanne Wenzel
Bureau Chief
Bureau for Private Postsecondary Education
2535 Capitol Oaks Drive, Suite 400
Sacramento California, 95833

RE: Request for Suggestions on Outreach to Closed School Students

Dear Chief Wenzel,

At the November 2015 Bureau Advisory Committee meeting, your office requested assistance in determining ways the Bureau can improve its outreach to the students enrolled at closed or closing for-profit schools. Public Advocates has since reached out to student/consumer advocates and legal aid organizations which offer assistance to students at closed/closing schools. Below are suggestions, both for when a closure is announced and after a school closure:

- The Bureau should work with legal aid organizations to ensure advocates are available to advise students at any events or activities scheduled by the Bureau or the school. To the extent that other for-profit schools are allowed on campus to market their programs to students for transfer, student advocates should also be allowed at the school. Public schools should also have equal representation at those meetings. The Bureau should work with community colleges especially, to encourage students to explore those options first.
- The Bureau should seek to prevent closed schools from hosting program/school fairs for students to transfers. Instead, it should encourage students to slow down and understand all their options before rushing into anything.
- The Bureau should better educate students about their closed school discharge/STRF rights, and how transferring credits impacts those rights. Students also need to know about the grace period on federal loans so they are not panicked about having to make a quick decision. The Bureau should also take steps to educate students about what to watch out for in terms of avoiding fraudulent for-profit schools.
- The most critical moment is the day of, and a few days after a closure—this is when students are paying attention and this is when students are most likely to be considering their options. Working with legal aid and community colleges is key during this period (and before if

the Bureau has any advanced notice), so these entities can participate in the Bureau's meetings and be available to answer questions students may have.

- The Bureau should advertise on its website and social media whenever legal aid offices are available to assist students at closed/closing, following the Attorney General's example. Postings should include the organizations' contact information, any clinics they are offering, and any materials designed to help students at closed/closing schools.
- The Bureau needs to ensure that when students at closed/closing schools request documents, the Bureau provides copies not only of transcripts, but also of enrollment agreements and any financial agreements they had with the school. These are essential materials, and many students do not know they need them to exercise their rights.
- To the extent the Bureau has addresses or emails for students enrolled at the closed/closing school, it should send STRF information and other information about legal aid resources out as soon as the school has closed. The Bureau should do this again after the students enter the repayment period on their federal loans, about 7 months after closure.

We hope that the Bureau will consider these suggestions seriously, and take steps to put these suggestions into practice. We are available to help convene the legal aid attorneys and student advocates who helped to compile these suggestions to meet with the Bureau staff to further discuss ways in which the Bureau can improve its outreach to the student victims of school closures. Please feel free to contact me with any questions, or to schedule a follow up meeting.

Sincerely,

A handwritten signature in black ink that reads "Angela Perry". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Angela Elizabeth Perry

Law Fellow

(415) 431-7430 x 307 / aperry@publicadvocates.org