

January 5, 2018

Barbara Gellman-Danley  
President  
Higher Learning Commission  
230 South LaSalle Street, Suite 7-500  
Chicago, IL 60604

Dear Dr. Gellman-Danley:

I am writing to express my support for Purdue University's proposal to acquire Kaplan University and create and operate NewU, a matter currently on the Commission's docket.

Having served as a commissioner at WASC, I know the complexity of the work accreditors do, and having served as a university administrator and college president, I know how consequential accreditor actions and engagement can be. Close conversations with accreditors can make institutions better, stronger, and more clearly focused on the outcomes that make their missions come alive. Thank you for doing this work.

From 2014 until January 2017, I had the privilege of serving as under secretary in the U.S. Department of Education, where I had responsibility for oversight of higher education programs, including the Department's higher education compliance and enforcement activities. In September 2017, I became president of the American Council on Education (ACE), representing nearly 2,000 institutions of higher education that span every sector of our community. Through this lens, I have come to an ever greater appreciation of the work our institutions do to serve their students and the larger public good in an era when the importance of higher education has never been greater for individuals and society. This comes, paradoxically, as a segment of the American population—particularly white, middle-class males who have little or no postsecondary education—have begun to question the value of a college degree despite all the evidence to the contrary. My support of the Purdue proposal to form NewU, and thereby launch a new public higher education institution, is informed by these experiences and perspectives. This groundbreaking project works toward an important objective for ACE and the entire higher education community: providing more avenues for colleges and universities to engage with the millions of Americans who are too often not benefiting from postsecondary education and mistakenly believe they will not derive value from it. This letter represents my personal views, as ACE does not make formal recommendations to our accreditor colleagues.

As you know well, traditional higher education institutions, no matter how excellent, struggle to extend their reach to the nontraditional adult learners who now make up half of the college-going population. Each year, you see and evaluate “substantive change” proposals that seek to enable institutions to innovate in ways that serve the 22-year-old returning veteran, the 30-year-old single mom, the first-generation college goer, the 50-year-old displaced worker, and the underprepared low-income high school graduate.

I view the Purdue NewU proposal in this light. It is, first and foremost, an effort by Purdue to extend its unquestioned tradition of educational excellence and its land grant mission by leveraging the tools, technologies, and practices that Kaplan has developed to reach more and different students.

The resources each partner brings to the table are substantial. Purdue has established a well-deserved reputation for excellence in teaching, research, and service. It has built a faculty that is second to none and is widely recognized as one of the nation's leading research institutions. Purdue has achieved this status without sacrificing its commitment to serve a broad range of students.

Kaplan, likewise, brings substantial resources to this proposed partnership. The first is a commitment to achieving high-quality outcomes for students. This has led to a massive investment in a learning platform that is, in my estimation, among the best in the country. The platform allows faculty to understand where students are academically and teach accordingly. The focus on outcomes and Kaplan's drive for continuous improvement has led it to invest in a set of student supports that provide scaffolding to students leading lives with multiple demands on their time, energy, and resources. It is a "lab" whose continued work promises insights not only for NewU but for Purdue and the wider field. Its ability to reach the very population that needs higher education the most will help NewU get a fast start at building to scale.

But for the elephant in the room, this might be an easy call.

Questions have been raised by colleagues for whom I have great respect and who have long sought to protect students from unscrupulous practices and rapacious institutions. The fear is this proposal could open the door to the kind of abuses that would harm students and institutions.

It will not.

It is wrongheaded to lump all for-profit colleges into the same bucket. Kaplan's results have been strong, and where they haven't, as in the failure of a number of their programs to meet the Gainful Employment thresholds, they have taken action to either remediate or close the programs. Then Sen. Tom Harkin (D-IA), in his report on the for-profit college industry in 2012, went out of his way to praise Kaplan by saying that, "Kaplan...has implemented the most significant reforms of any company [the Committee] examined." That's how we want institutions to react to troubling outcomes.

Kaplan has been a pioneer in creating protections for students. The "Kaplan Commitment" allows students to enroll, register, and take three weeks of coursework before having to pay for a class. This enables the student to determine whether the work is work they can do, and helps Kaplan to better understand what it will take to help the student be successful.

This proposed transaction more than passes muster for a number of reasons. While NewU will be organized and run as an independent non-profit, Purdue will maintain strong and effective oversight. Purdue will retain control over the entire operation, and will have a supermajority of NewU Board members (4-1). In addition, Kaplan Higher Education will maintain the same contractual responsibility that has now to Kaplan University to provide non-academic support to NewU. There is no change proposed that would enhance the income of any individual or shareholder, and Kaplan University's transfer of its assets to NewU at essentially zero cost makes it evident that the previous owners will not profit from the asset transfer.

The bottom line is that this transaction is being undertaken with the public interest in mind and appropriate protections in place for the students NewU will serve.

At the end of the day, leadership matters. President Daniels and the Purdue Board are committed to defending and extending the highest ideals of higher education in this country. And that's the point. This carefully designed, innovative initiative seeks to bring a Purdue quality education to tens of thousands of students who need access to the best we can provide for them. Putting Purdue in the driver's seat of one of the largest proprietary institutions in the country is a positive development for both institutions, the students they will serve, and American higher education. I hope you will agree.

I appreciate your consideration of my views and am happy to talk with you further.

With great respect,

Ted Mitchell  
President



HARVARD Kennedy School

Center for Public  
**LEADERSHIP**

Professor Todd Rogers  
Associate Professor of Public Policy  
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Dr. Barbara Gellman-Danley  
President  
Higher Learning Commission  
230 South LaSalle Street, Suite 7-500  
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Re: Kaplan

Dear Dr. Barbara Gellman-Danley

I am an Associate Professor of Public Policy at Harvard Kennedy School of Government at Harvard University. I run the Student Social Support R&D Lab where we conduct large-scale randomized controlled experiments in more than one thousand schools and colleges. We develop scalable interventions to mobilize social support to increase student success.

I am writing to describe my collaborations with Kaplan over the last 6 or so years. Initially, I began working with Bror Saxberg who was their Chief Learning Officer. With the support of Kaplan CEO, Andrew Rosen, Bror built what they call the “research pipeline” where all branches of Kaplan were committed to conducting high quality research. My lab and I explored or conducted multiple randomized controlled experiments with Kaplan Test Prep and Kaplan University.

Kaplan has been among the most committed research partners my lab and I have worked with. They have had a genuine commitment to using learning and motivational sciences to improve student outcomes, and to conducting high quality research to become a leader in contributing to those sciences. One thing that has truly impressed me about their ethos has been their commitment to actual learning, and not just false positive results. As an illustration, we conducted a project, the Study Supporter project, over several years with several replication efforts. The project involved having online students nominate a friend or family member with whom they communicate but with whom they do not take classes to be their “study supporter.” Supporters were then randomly assigned to a control group or a treatment group. Those in the treatment group received weekly text messages about how the study supporters could support the student’s academic success (e.g., “Todd has midterm this week. Ask him what his study plan is”). Those in the control group received no additional text messages. Our first study showed extremely promising increases in student grades and persistence. We then attempted to replicate the study and found that the intervention generated no detectable impact. Finally, Kaplan’s team committed to getting the right answer so they committed to a

very large recruitment of thousands of students to participate in the study. The net result, we learned, was that the intervention as we conceived it did not appear to have a detectable effect in the Kaplan University context.

Rather than being discouraged, the Kaplan team instead responded by asking us what different promising ideas we had for helping their students succeed. They wanted to study different potential interventions to improve their students' success and they wanted us to keep working with them. This was unusual! Often organizational partners want to discontinue collaboration after a labor intensive project shows no meaningful effects. The lack of meaningful effects still teaches us things; we still learned. Among other things, we discovered that this intervention was not worth scaling within Kaplan University. Instead, the Kaplan team (wisely and correctly) viewed this result as part of the process of innovation, and were committed to continuing to innovate.

When I refer to the "Kaplan team" I am referring to many individuals, from their leadership to their research director to their data scientists and instructors. My experience has been that this is an organization that is unusually committed to learning.

My lab and I continue to conduct research with Kaplan. Matthew Braslow, Kaplan's Director of Assessment and Research, has formed a "lab group" of researchers collaborating with Kaplan that is to have periodic "lab meetings" where we discuss our projects. I am optimistic about their learning culture, and have proposed new promising interventions that I hypothesize will improve student achievement. I look forward to collaborating with the Kaplan team to test, refine, and (if the interventions prove to be potent) hopefully scale them to help as many students as possible.

In addition to learning if the interventions work, what is exciting about working with Kaplan is that they are committed to scaling up proven interventions that help students. I believe the merger with Purdue can lead to both *more learning* and *greater scaled implementation* of interventions that help students succeed. If Kaplan's culture of learning and innovation is adopted by Purdue, I believe it will serve both of the organizations' important missions.

One of the reasons my lab and I have worked with Kaplan is because of the promise virtual universities and online learning offers students who find more traditional physical education inaccessible. I am hopeful that the merger of these two organizations can increase the quality, scope, and effectiveness of the offerings available to these students.

Please do not hesitate to follow up with questions,

Todd Rogers



October 18, 2017

Dr. Barbara Gellman-Danley  
President  
Higher Learning Commission  
230 South LaSalle Street, Suite 7-500  
Chicago, IL 60604-1411

Dear Dr. Gellman-Danley:

The Association of Public and Land-grant Universities' (APLU) agenda is built on the three pillars of increasing degree completion and academic success, advancing scientific research, and expanding engagement. Our priorities mirror the HLC student success agenda and directly relate to a current review you are conducting, that of one of our member institutions -- Purdue University and its application concerning Kaplan University.

When Purdue University President Mitch Daniels and the Purdue Board of Trustees made the surprising announcement, APLU was quick to endorse the concept that we must all work harder to make higher education more broadly accessible, including for students whose life responsibilities and schedules make full-time traditional higher education difficult.

It is undeniable that college degrees provide great benefits to students. Moreover, our society and economy immensely benefit from having a more educated and workforce-ready population. In order for higher education institutions to meet aggressive credential and degree completion targets there must be a focus on unenrolled students with some college credits and adults with no college experience at all. These are some of the primary groups that Purdue is proposing to address with its acquisition.

Finding ways to decrease costs while delivering a high quality education to an expanded and more diverse student body demands that public higher education embrace new models for learning and advising. Information technology is rapidly changing the way students access information and learn.

Purdue's initiative is creative. Higher education needs bold new initiatives to achieve big goals. President Daniels and Purdue University are to be congratulated for seeking a new and positive approach to broadening access and degree completion.

Of course, members of the Commission will carefully review the details of this transaction. I encourage you to also keep in mind the overwhelming need for innovation and expanded outreach beyond the traditional campus.

Sincerely,

Peter McPherson  
President, Association of Public and Land-grant Universities





## Thurgood Marshall College Fund

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December 4, 2017

Dr. Barbara Gellman-Danley  
President  
Higher Learning Commission  
230 South LaSalle Street  
Suite 7-500  
Chicago, IL 60604

Dear Dr. Gellman-Danley:

For decades, America's higher education system has been the envy of the world, and its goal of providing access to students of all backgrounds has been central to its identity and success. From the creation of land-grant universities to the development of community colleges to the GI bill and beyond, our postsecondary education system has continually expanded in scope and enrollment. Each step toward such progress has met with obstacles and resistance, but ultimately our better instincts have prevailed, and we've taken steps toward greater inclusiveness. We have further to go.

I'm pleased and inspired to see Purdue's proposal to acquire Kaplan University as a means of addressing adult learners that it's currently unable to serve through its West Lafayette and regional campuses.

This noble effort to increase the diversity of Purdue's student population stands in stark contrast to a recent analysis of data from the Equality of Opportunity project by New America. That study indicates nearly two-thirds of selective public universities actually reduced their share of students from the bottom 40% of household earnings over the past decade (2000 to 2011).

As someone who sits on the Capella University Academic Board, I am familiar with Kaplan University's quality and leadership in adult online education, and I'm encouraged to see a school with Purdue's reputation take ownership of that fine institution. This acquisition sends a message to our most prestigious universities that they can no longer sit on the sidelines when it comes to inclusion. Online programs provide an important solution for enfranchising many of today's underserved students.

I know Don Graham through his "Dreamers" and the DC Cap programs. His work, like my own at Delaware State and soon on behalf of The Thurgood Marshall College Fund, has been guided in large part by the desire to break down obstacles for deserving students to get the college education they deserve.



## Thurgood Marshall College Fund

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Finally, as someone closely involved with the reaffirmation of Delaware State's accreditation by the Middle States Commission on Higher Education (MSCHE) five years ago, I greatly appreciate the thorough and rigorous review you are undertaking. I hope that you will continue to be thoughtful about how to prioritize the pursuit of inclusiveness as you move forward.

With great respect,

Dr. Harry Williams  
President of Delaware State University  
President and CEO of the Thurgood Marshall College Fund (TMCF)



## **Additional Endorsements & Quotes**

### ***Arne Duncan, U.S. Secretary of Education under Barack Obama:***

“I’m excited by this opportunity for a world-class university to expand its reach and help educate adult learners by acquiring a strong for-profit college. This is a first, and if successful, could help create a new model for what it means to be a land-grant institution.”

### ***Andrew K. Zeller, Fmr. President of Purdue Graduate Student Government, quoted in the Chronicle of Higher Education:***

“This acquisition presents tremendous possibilities for expanding access and opportunity to nontraditional students and working adults overlooked and underserved by the traditional campus model.”

### ***Mike Young, Fmr. President of Purdue Student Government:***

“The NewU initiative is one of the most exciting things I’ve seen Purdue undertake. It’s going to bring a high-quality education to thousands of people for whom a brick-and-mortar university experience is impractical or out of reach. The scale of impact is significant, and it fits perfectly with the land-grant mission of Purdue.”

### ***Dr. Arthur Levine, Fmr. President of the Teachers College at Columbia University; President of the Woodrow Wilson National Fellowship Foundation***

“Purdue stands as one of the nation’s great industrial-era universities. In recent years, it has made notable forays into the digital era in its research and programs. However, the Kaplan deal marks a dramatic change in scale. It represents a merger of both eras ... joining the present and the future and creating an institution that will guide higher education into tomorrow. Purdue’s vision in taking this bold step should be applauded.”

### ***Richard Vedder, Distinguished Professor of Economics Emeritus at Ohio University; Director of The Center for College Affordability & Productivity:***

“Purdue is improving access I think in a more legitimate, cost-effective way, rather than simply expanding enrollment at West Lafayette or at another Purdue campus ... Purdue is trying to maintain its reputation for being a high-quality public residential university while expanding its reach – this is probably as good way to do it as any.”

### ***Alana Dunagan, higher education researcher at the Clayton Christensen Institute, writing in the Wall Street Journal:***

“The higher-education industry, full of brilliant and competent leaders, is ripe for disruption. Despite mounting political pressure—not to mention the struggles of indebted alumni—most college presidents believe that their institutions are providing students with good value ... The [acquisition] is unexpected, unconventional and smart ... Mr. Daniels is setting Purdue on the right course, for good reasons, and he deserves a great deal of credit.”

### ***Jason Kloth, CEO of Ascend Indiana, quoted in the Indianapolis Business Journal:***

“Purdue’s attempts to uncover a system to provide training to more substantial groups of men and women, together with nontraditional college students, will have a sizeable positive effect on educational attainment that leads to improved paying positions.”

***Martin Kurzweil, Director of Educational Program Transformation at Ithaca S+R:***

“The Purdue administration and faculty are quite interested in active learning, analytics and competency-based education. Kaplan presents a coherent model for how to do that.”

***Donald Farish, President of Roger Williams University:***

“Purdue has the opportunity of showing the country how a great public university can provide even greater service to society by dramatically increasing access to a Purdue education.”

***Brian C. Mitchell, Fmr. President of Bucknell University, Director of the Edvance Foundation:***

“Done correctly, the new arrangement will likely improve Purdue’s competitive standing among its peers ... The deal will also improve the national and global reach of a major research university that is best known for its highly-regarded science and engineering programs.”

***Dr. Carolyn Cummings Perrucci and Dr. Robert Perrucci, Professors of Sociology at Purdue, writing in the Lafayette Journal & Courier:***

“The recent decisions by President Mitch Daniels of Purdue University are two big steps in the right direction. The first was the creation of the Purdue Polytechnic High School in Indianapolis and the second was the acquisition of Kaplan University.”