RISK-SHARING MODEL

PROTECT TAXPAYERS AND STUDENT BORROWERS ACT PROPOSAL

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Introduction

This risk sharing model seeks to align the often conflicting interests of taxpayers, students, institutions of higher education, and the Federal government by addressing three related goals:

- Incentivize states and institutions of higher education to dedicate more resources aimed at improving student success in retention, progression, completion, and employment;
- Incentivize institutions to become more affordable and more responsible for the reduction of unnecessary student borrowing; and
- Incentivize the federal government to more closely monitor student success with simpler, more logical, and less onerous regulations that are both fair and applicable to all institutions of higher education.

SECTION 1. SHORT TITLE

This model may be cited as the ``Protect Taxpayers and Student Borrowers Act Proposal"

SECTION. 2. PURPOSE

The purpose of this Proposal is to protect taxpayers and student borrowers by requiring institutions of higher education to assume some of the risk of default for student loans under part D of title IV of the Higher Education Act of 1965 (20 U.S.C. 1087a et seq.).

SECTION 3. INSTITUTIONAL REPAYMENTS TO THE DEPARTMENT OF EDUCATION FOR DEFAULTED LOANS

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Section 454 of the Higher Education Act of 1964 (20 U.S.C. 1087d) is amended--

(1) in subsection (a)—

(A) in paragraph (5), by striking ``and'';

(B) in paragraph (6) by striking the period at the end and inserting ``; and''; and

(C) by adding at the end the following

``(7) provide that the institution accepts the institutional risk-sharing requirements under subsection (d), if applicable.''; and

(2) by adding at the end the following:

``(d) Institutional Risk-Sharing for Student Loan Defaults.—

After which the following would be found:

(1) Requirements for Inclusion and Risk-Sharing Payment Liability

Every institution of higher education—whether public, private nonprofit, or private for-profit and whether less than 2-year, 2-year, or 4-year, that has a rate of participation in the direct student loan program of 25 percent or higher, shall remit, at such times as the Secretary may specify, a risk-sharing payment based on a maximum of 20 percent of the total volume of student loans (including interest) under this part that (a) were made to students to cover the cost of tuition, fees, books, and supplies and (b) that are in default during the most recent fiscal year for which data are available, as determined under paragraph (2).

(2) Determination of Risk-Sharing Payments

Subject to paragraph (4), with respect to each fiscal year, an institution of higher education described in paragraph (1), will be liable for risk-sharing payments based on a combined total of the following two metrics.[2]

(A) To incentivize responsible borrowing, up to 50 percent of the maximum 20 percent payment is based on the institution's three-year cohort default rate (CDR).

(B) To incentivize a focus on student success, up to 50 percent of the maximum 20 percent payment is based on the institution's Pell Grant 3-year completion or graduation rate, as appropriate, for less than 2-year or 2-year schools, and Pell Grant 6-year graduation rates for 4-year schools.[3] These completion or graduation rate metrics are to be risk-adjusted to help identify schools that are over- or underperforming relative to the students they serve.[4]

[2] A specific advantage of the use of two metrics, rather than only one, such as cohort default rate, is that CDRs can be manipulated by schools that guide their students into deferment and forbearance repayment plans.

[3] We recognize there is a significant discrepancy between the Pell graduation rates that institutions report to the government and those that they report to inquiring applicants. But until this is fixed, the Pell graduation rates, or completion rates, is used as reported in the U.S. Department of Education's National Student Loan Database System, risk-adjusted as noted. See Butrymowicz, S. Obama's college scorecard shows Pell Grant data problem: There's finally federal data on low-income college graduation rates—but it's wrong. Retrieved from http://www.usnews.com/news/articles/2015/10/08/obamas-college-scorecard-shows-pell-grant-data-problem

[4] Because institutions often serve radically different student populations, it is critical that Pell graduation rates used be adjusted in keeping with individual risk factors recognized by the U.S. Department of Education (see

The Secretary shall instruct the Commissioner of Education Statistics to convene a technical working group to determine the variables to be included in the risk-adjusted metrics.

(3) Breakdown of Risk-Sharing Payments According to the Two Metrics

The payment due the Secretary, based on the percentage of the total volume of student loans (including interest) under this part that (a) were made to students to cover the cost of tuition, fees, books, and supplies and (b) that are in default during the most recent fiscal year for which data are available, is as follows.[5]

(A) Payment based on 3-year CDR:

(i) 10% for CDRs 30% or higher
(ii) 8% for CDRs lower than 30% but not lower than 26%
(iii) 6% for CDRs lower than 26% but not lower than 22%
(iv) 4% for CDRs lower than 22% but not lower than 18%
(v) 2% for CDRs lower than 18% but not lower than 15%
(vi) No payment due for CDRs lower than 15%

(B) Payment based on Pell Grant 3-year and Pell Grant 6-year graduation rates:

(i) 10% for graduation rate 10% or lower
(ii) 8% for graduation rate higher than 10% but not higher than 20%
(iii) 6% for graduation rate higher than 20% but not higher than 30%
(iv) 4% for graduation rate higher than 30% but not higher than 40%
(v) 2% for graduation rate higher than 40% but not higher than 50%
(vi) No payment due for graduation rate higher than 50%

(4) Waiver or Reduction of Payments for Certain Institutions Serving Large Numbers of Low-Income Students

(A) To incentivize institutions described in paragraph (1) to enroll as many promising low-income students as possible, for a subsequent fiscal year the Secretary may waive or reduce by up to 50 percent the total annual amount of risk-sharing payments due in accordance to paragraph (3) if all three of the following criteria are in place:

(i) At least 50% of the institution's degree or certificate-seeking students are receiving need-based assistance under Title IV;

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http://nces.ed.gov/pubs/web/96237.asp). Blumenstyk, G. (2014, April 28). "Risk adjusted" metrics for colleges get another look. Retrieved from http://www.chronicle.com/article/Risk-Adjusted-Metrics/146193/

[5] A sliding scale is used to avoid penalizing institutions for being just over a threshold while leaving free and with no incentive to improve those barely below that threshold.

(ii) It has high educational, student retention, and career services expenditures as a percentage of total expenditures (excluding research and budgets related to the institution's health centers); and

(iii) It is making satisfactory progress in carrying out a student loan management plan that includes (a) an analysis of the risk factors correlated with higher student loan defaults that are present at the institution and (b) the actions that the institution will take to address such factors.

The Secretary shall instruct the Commissioner of Education Statistics to convene a technical working group to determine the proper cut-offs concerning "high educational expenditure" and "satisfactory progress."

(5) Modifications of Current Policies to Incentivize Access and Promote Success of Low-Income Students

(A) To maintain or increase access of low-income students to the institutions described in paragraph (1), the following changes shall be made to the calculation of cohort default rates:

(i) Institutions shall be permitted to limit student borrowing by being allowed to restrict direct student loans to the cost of tuition, fees, books, and supplies.[6] To avoid undue hardship to low-income students, institutions shall have the authority to make exceptions to this restriction on a program-by-program[7] and case-by-case basis, as long as published nondiscriminatory criteria are applied.

(ii) Institutions shall be permitted to award post-completion scholarships and post-participation incentive grants that can cover all or part of outstanding student loans.[8]

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[6] This policy change is necessary to limit overborrowing. It requires a change to the regulation that prohibits schools from limiting the amount of loans a student takes to attend an institution. As it stands, the regulation punishes schools for factors outside their control when current student debt formulas are applied to them (see 454(a)(1)(C) of the HEA, 20 U.S.C. 1087d(a)(1)(C). See also Federal Student Aid. (2014, May). *2014–15 federal student aid handbook* (p. 3-125). Retrieved from https://ifap.ed.gov/fsahandbook/attachments/1415FSAHandbookCompleteActiveIndex.pdf) This policy change will also help to rationalize the arbitrary manner in how schools today set their Cost of Attendance figures (see Sharpe, R. (2016, August 5). How much does living off-campus cost? Who knows? *New York Times.* Retrieved from http://www.nytimes.com/2016/08/07/education/edlife/how-much-does-living-off-campus-cost-who-knows.html?ribbon-ad-idx=15&rref=education/edlife&module=Ribbon&version=context&region=Header&action=click&contentCollection=Education%20Life&pgtype=article&_r=0).

[7] This is required to maintain programs that prepare students for low-paying but necessary careers, such as social welfare, teacher education, and jobs in some allied health fields.

[8] This policy change entails modifying 34 CFR 668.183(c) (iii), which currently ends up treating a borrower whose loan is fully or partially repaid by an institution as a defaulter in CDR calculations. By eliminating this provision—and by granting institutions the authority to cancel a student's enrollment and allowing the student to return all financial aid funds that were unused —institutions can be incentivized to offer (a) post-completion scholarships to

(6) Fund and Use of Risk-Sharing Payments

(A) There is established in the Treasury of the United States a separate account for the deposit of risk-sharing payments collected under this subsection. The Secretary shall deposit any payments collected pursuant to this subsection into such fund.

(B) Of the amounts in the fund described in subparagraph (A), for each fiscal year the Secretary shall make available all of such amounts for a Federal Pell Grant fund that shall be used to offset any future shortfalls in funding under the Federal Pell Grant program.

(7) Applicability

The Secretary shall carry out this subsection beginning with the cohort default rate for the 2016 cohort. The 2016 cohort shall include current and former students who enter repayment in fiscal year 2016.

(8) Report to Congress

The Secretary shall report on an annual basis to the Committee on Health, Education, Labor, and Pensions of the Senate and the Committee on Education and the Workforce of the House of Representatives the following information:

(A) A list of institutions that have been subject to risk-sharing payments in the previous year.

(B) The required risk-sharing payment from such institutions.

(C) The amount of risk-sharing payments collected from such institutions.

(D) A list of the institutions that have received waivers from the risk-sharing payment and the reason for such waiver.

(E) A list of the institutions that have received reductions in the required risk-sharing payment.

(F) The use of funds deposited from risk-sharing payments and the amount reserved for the Federal Pell Grant program.

SECTION 4. FINANCIAL RESPONSIBILITY

Section 498(c)(1) of the Higher Education Act of 1965 (20 U.S.C. 1099c(c)(1)) is amended by striking subparagraph (C) and inserting the following:

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students who have completed their studies and want to start out with no student loan debt and (b) post-participation incentive grants that leave students free to start school anew with a clean slate after having failed on a previous try. These scholarships should be limited to a percentage of the tuition for the time a student was enrolled (e.g., x dollars per semester).

"(C) to meet all of its financial obligations, including institutional risk-sharing payments, refunds of institutional charges, and repayments to the Secretary for liabilities and debts incurred in programs administered by the Secretary."

Impact Assessment

Using 2013-2014 Scorecard data and 2014 IPEDS data, Tables 1–4 summarize the impact that the two proposed risk-sharing payment categories would have on institutions of higher education (IHEs) that are currently participating in Title IV need-based programs and would be liable to risk-sharing payments under Section 3, paragraph (1) of the proposed bill.

Liabilities Based on CDR

As shown in the penultimate row of Table 1, the majority of schools in every level of liability are for-profit institutions. This is a function of their large numbers among Title IV schools (see Table 5 below). In rows 2-4 of Table 1, which report the institution by sector and level of liability, the gaps across sectors shrink substantially. Moreover, as is evident in Table 2, the disparities across sectors is compounded by the fact that most for-profit institutions are less-than-two year certificate granting schools, which have higher default rates.

Table 1. Payment Breakdown of 3-Year CDR Liability – By Percentage of Schools Affected, Control Sector, Type of Institution, and Level of Liability[9]

Percentage of Payment Due (by 3-Year CDR)							
By Type of Institution	**30%+ (10%)**	**26-30% (8%)**	**22-26% (6%)**	**18-22% (4%)**	**15-18% (2%)**	**<15% (0%)**	**Total**
Public	1%	3%	7%	11%	20%	58%	100%
Private Not For-Profit	4%	9%	9%	9%	12%	56%	100%
Private For-Profit	9%	7%	12%	13%	11%	48%	100%
By Level of Liability							
Public	1%	4%	4%	6%	12%	8%	
Private Not For-Profit	6%	14%	9%	8%	11%	12%	
Private For-Profit	93%	82%	87%	85%	77%	80%	
Potential Payment (in $000s) by level of Liability	$5,200	$6,300	$18,700	$19,400	$1,400		$51,000

9 All percentages have been rounded up, therefore, they may not add up to 100%. See Methods, Data Sources, and Tables section below for the data sources used, the calculations made to arrive at the estimates, and detailed tables on payment liabilities.

Table 2. Payment Breakdown by 3-Year CDR Rate Liability – By Predominant Level of Awards/Degrees Granted, Percentage of Schools Affected, Control Sector, Type of Institution, and Level of Liability

Percentage of Payment Due (by 3-Year CDR)							
By Type of Institution	30%+ (10%)	26-30% (8%)	22-26% (6%)	18-22% (4%)	15-18% (2%)	<15% (No Penalty)	Total
Predominantly Certificate	9%	7%	11%	13%	11%	49%	100%
Predominantly Associate	2%	9%	15%	14%	17%	44%	100%
Predominantly Bachelor	4%	6%	6%	8%	10%	66%	100%
By Level of Liability							
Predominantly Certificate	95%	81%	83%	85%	81%	83%	
Predominantly Associate	2%	13%	13%	11%	14%	8%	
Predominantly Bachelor	3%	6%	4%	4%	5%	9%	
Potential Payment (in $000s) by level of Liability	$5,200	$6,300	$18,700	$19,400	$1,400		$51,000

Liabilities Based on Pell Graduation Rate

Current federal graduation rates are based only on first-time, full-time students; therefore, Tables 3, 4, and 10-14 are for illustrative purposes only.

Because so many students enrolled in 2-year schools, regional comprehensive universities, and for-profit institutions are transfers from other institutions and/or part-time learners, current official graduation rates fail to accurately capture student success rates. Moreover, the student populations in different types of IHEs systematically vary in the concentration of students with different risk factors. Consequently, these tables will need to be updated on the basis of risk-adjusted metrics that can more precisely identify both the schools that are graduating more Pell students than would be expected and those which are underperforming. As noted in Section 3, paragraph (2)(B) of the proposed bill, the Secretary is requested to instruct the Commissioner of Education Statistics to convene a technical working group to determine the variables to be included in the risk-adjusted metrics. When this task is completed, Tables 3, 4, and 10-14 could be updated.

Table 3. Payment Breakdown by Pell 3- or 6-Year Graduation Rate Liability – By Percentage of Schools Affected, Control Sector, Type of Institution, and Level of Liability

Percentage of Payment Due (by Pell Graduation Rate)							
By Type of Institution	<10% (10%)	10-20% (8%)	20-30% (6%)	30-40% (4%)	40-50% (2%)	>50% (0%)	Total
Public	14%	14%	18%	9%	14%	32%	100%
Private Not For-Profit	0%	8%	18%	16%	25%	32%	100%
Private For-Profit	0%	2%	4%	7%	12%	76%	100%
By Level of Liability							
Public	100%	21%	13%	6%	5%	3%	
Private Not For-Profit	0%	50%	53%	41%	40%	12%	
Private For-Profit	0%	29%	33%	53%	55%	85%	
Potential Payment (in $000s) by level of Liability	$400	$3,000	$34,000	$3,700	$5,600		$46,700

Table 4. Payment Breakdown by Pell 3- or 6-Year Graduation Rates – by Predominant Level of Awards/Degrees Granted, Percentage of Schools Affected, Control Sector, Type of Institution, and Level of Liability

Percentage of Payment Due (by Pell Graduation Rates)							
By Type of Institution	<10% (10%)	10-20% (8%)	20-30% (6%)	30-40% (4%)	40-50% (2%)	>50% (0%)	Total
Predominantly Certificate	0%	1%	2%	4%	12%	81%	100%
Predominantly Associate	3%	9%	19%	19%	12%	39%	100%
Predominantly Bachelor	0%	8%	19%	16%	28%	30%	100%
By Level of Liability							
Predominantly Certificate	33%	14%	13%	29%	50%	79%	
Predominantly Associate	67%	50%	47%	41%	17%	13%	
Predominantly	0%	36%	40%	29%	33%	8%	

Bachelor							
Potential Payment (in $000s) by level of Liability	$400	$3,000	$34,000	$3,700	$5,600		$46,700

As is evident from Tables 1-4, the potential gross dollar amount that would have been collected under the proposed risk-sharing model, using 2013-2014 Scorecard data and 2014 IPEDS data, is approximately $97,700,000. However, that amount is subject to (a) the reduction in liability payments permitted under Section 3 paragraphs (4) and (5) for certain institutions serving large numbers of low-income students and (b) increases or decreases resulting from the risk-adjusted metrics applied to Pell graduation rates.

Methods, Data Sources, and Additional Tables

Because the most recent Scorecard dataset (2014–15) is incomplete, the Scorecard dataset from the previous year (2013–14) was used for most of the data, as well as the 2014 full-time equivalent (FTE) student data from the Integrated Postsecondary Education Data System (IPEDS).[10] From these datasets the following variables with their associated descriptions were used:

- **UNITID:** Unit ID for institution
- **INSTNM:** Institution name
- **STABBR:** State postcode
- **PREDDEG:** Predominant undergraduate degree awarded
- **CONTROL:** Control of institution
- **CDR3:** 3-year cohort default rate
- **PELL_COMP_ORIG_YR3_RT:** Percent of students who received a Pell Grant at the institution and who completed in 3 years at original institution
- **PELL_COMP_ORIG_YR6_RT:** Percent of students who received a Pell Grant at the institution and who completed in 6 years at original institution
- **DEBT_MDN:** The median original amount of the loan principal upon entering repayment
- **PELL_DEBT_MDN:** The median debt for Pell students

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[10] U.S. Department of Education. (n.d.). College Scorecard data. Retrieved 3/1/17 from https://collegescorecard.ed.gov/data/.

• **DEBT_N:** The number of students in the median debt cohort

• **PELL_DEBT_N:** The number of students in the median debt Pell students' cohort

• **UGDS:** Enrollment of undergraduate certificate/degree-seeking students

• **NUM4_PUB:** Number of Title IV students (public institutions)

• **NUM4_PRIV:** Number of Title IV students (private for-profit and nonprofit institutions)

• **CDR3_DENOM:** Number of students in the cohort for the 3-year cohort default rate

In keeping with Section 3 paragraph (1) (*Requirements for Inclusion and Risk-Sharing Payment Liability*)**,** we first identified institutions with 25% or more of their students receiving Title IV funds. The number of Title IV students was then divided by the enrollment of undergraduate certificate/degree seeking students. Institutions either below 25% or that did not provide the information needed to calculate the percentage were dropped from further analysis. Many institutions have multiple campuses and report only aggregated data, releasing the same numbers for each campus. We eliminated all duplicates and the resulting consolidated institution list was used for the calculations below.

CDR Calculations

Using a scale of measures of nearly equal size, a 10% payment liability was applied to any school with a CDR above 30%, an 8% payment liability for schools with a 26–30% CDR, 6% payment liability for a 22-26% CDR, 4% payment liability for a 18-22%, 2% payment liability for a 15-18% CDR, and no payment liability if a school was below a 15% CDR.

The Council of Economic Advisers estimated that two thirds of defaulted loans are $10,000 or less.[11] Hence, even the reported median debt likely overstates an institution's level of debt. Therefore, a weighted average of one third (1/3) of the total median debt (DEBT_MDN) and two thirds (2/3) of the median debt of withdrawn students (WDRAW_DEBT_MDN) was calculated to estimate the revised student debt. For example, the DEBT_MDN at the California Healing Arts College was $9,500. The withdrawn student debt amount was lower at $4,750. Using the 1/3:2/3 formula, the revised student debt amount was $6,333. Once again the number of students in default was estimated as previously described and that number was multiplied by the calculated weighted average loan amount. The sliding scale of penalties based on CDRs was then applied.

[11] "Defaults are concentrated among borrowers with small-volume loans, in large part because these borrowers are less likely to have completed their degrees. Loans of less than $10,000 accounted for nearly two-thirds of all defaults for the 2011 cohort three years after entering repayment. Loans of less than $5,000 accounted for 35 percent of all defaults. Thus while there is significant public attention on high debt burdens among traditional students attending four-year institutions, default is concentrated among a different group of borrowers." Council of Economic Advisers. (2016, July). *Investing in higher education: Benefits, challenges, and the state of student debt* (p. 5). Retrieved from https://www.whitehouse.gov/sites/default/files/page/files/20160718_cea_student_debt.pdf.

The sum of all CDR penalties for the 631 liable schools was approximately $51,000,000. Again, there are a handful of institutions with missing debt information, so the actual figure may be slightly higher.

Pell Calculations

For predominantly certificate and associate schools, the 3-year Pell graduation rate (PELL_COMP_ORIG_YR3_RT) was used in our calculations. For predominantly bachelor and graduate schools, the 6-year Pell graduation rate (PELL_COMP_ORIG_YR6_RT) was used. For schools that did not specify a predominant award, whichever rate that was reported in the Scorecard was used. If an IHE reported both rates, we used the higher of the two. Using a scale with measures of nearly equal size, any school with less than a 10% Pell graduation rate was assessed a 10% payment liability and those with 10–20%, an 8% payment liability; with 20-30%, a 6% payment liability; with 30-40%, a 4% payment liability; and with 40-50%, a 2% payment liability. Any IHE with a Pell graduation rate above 50% was not assessed a payment liability.[12]

In keeping with Section 3 paragraph (1), the appropriate dollar amount to be considered in risk sharing is not the total loan volume but the volume of defaulted loans. Because the Scorecard data do not report this, estimates were arrived at by first calculating the number of students in default (estimated by multiplying the number of students in the CDR cohort [CDR3_DENOM] by the 3-year CDR [CDR3]). This estimated number of students was then multiplied by the median Pell student debt amount. The sliding scale of liability was applied to this estimated volume of defaulted loans. The sum of all Pell payment liabilities for the 136 schools affected was more than $46,700,000. A handful of institutions are missing median Pell debt information, so the actual figure may be slightly higher.

Finally, to find the number of full-time equivalent students affected, the FTE fall enrollment (DRVEF2014) was used for each institution from the Integrated Postsecondary Education Data System (IPEDS) for fiscal year 2014–15 and reported by categories in the next set of tables.

[12] Based on the latest Scorecard data available, the average Pell graduation rate is 52%, approximately the same as the proposed upper limit for liability.

Additional Tables for a Detailed Examination of the Impact Assessment

Table 5. Payment Breakdown by 3-Year CDR-By Number of Schools Affected

Number of Schools Affected, by Percentage of Payment Due (by 3-Year CDR)							
Type of Institution	30%+ (10%)	26-30% (8%)	22-26% (6%)	18-22% (4%)	15-18% (2%)	<15% (0%)	Total
Public	1	3	6	10	18	52	90
Private Not For-Profit	6	12	12	13	17	77	137
Private For Profit	95	70	120	134	114	501	1,034
Total	102	85	138	157	149	630	1,261
Predominantly Certificate	97	69	115	133	120	521	1,055
Predominantly Associate	2	11	18	17	20	53	121
Predominantly Bachelor	3	5	5	7	8	55	83
Total	102	85	138	157	148	629	1,259

Table 6. Payment Breakdown by 3-year CDR – By Number of Full-Time Equivalent Students in Affected Schools

Number of Full-time Equivalent Students, by Percentage of Payment Due (by 3-Year CDR)							
Type of Institution	30%+ (10%)	26-30% (8%)	22-26% (6%)	18-22% (4%)	15-18% (2%)	<15% (0%)	Total
Public	53	767	6,940	3,684	8,610	19,759	39,813
Private Not For-Profit	4,391	10,448	5,980	10,376	12,784	82,256	126,235
Private For Profit	12,359	14,151	23,456	286,962	21,399	80,923	439,250
Total	16,803	25,366	36,376	301,022	42,793	182,938	605,298
Predominantly Certificate	12,498	12,848	20,359	28,622	20,114	77,997	172,438
Predominantly Associate	386	8,535	10,047	11,525	17,524	30,126	78,143
Predominantly Bachelor	3,919	3,983	5,970	260,875	5,077	74,753	354,577
Total	16,803	25,366	36,376	301,022	42,715	182,876	605,158

Table 7. Payment Breakdown by 3 Year CDR Rate – By Percentage of Full-Time Equivalent Students in Affected Schools by Institution Type

Percentage of Full-time Equivalent Students, by Percentage of Payment Due (by 3-Year CDR)						
Type of Institution	30%+ (10%)	26-30% (8%)	22-26% (6%)	18-22% (4%)	15-18% (2%)	<15% (0%)
Public	0%	3%	19%	1%	20%	11%
Private Not For-Profit	26%	41%	16%	3%	30%	45%
Private For Profit	74%	56%	64%	95%	50%	44%
Total	100%	100%	100%	100%	100%	100%
Predominantly Certificate	74%	51%	56%	10%	47%	43%
Predominantly Associate	2%	34%	28%	4%	41%	16%
Predominantly Bachelor	23%	16%	16%	87%	12%	41%
Total	100%	100%	100%	100%	100%	100%

Table 8. Payment Breakdown by 3-Year CDR – By Percentage of Full-Time Equivalent Students in Affected Schools by Payment Due

Percentage of Full-time Equivalent Students, by Percentage of Payment Due (by 3-Year CDR)							
Type of Institution	30%+ (10%)	26-30% (8%)	22-26% (6%)	18-22% (4%)	15-18% (2%)	<15% (0%)	Total
Public	0%	2%	17%	9%	22%	50%	100%
Private Not For-Profit	3%	8%	5%	8%	10%	65%	100%
Private For Profit	3%	3%	5%	65%	5%	18%	100%
Predominantly Certificate	7%	7%	12%	17%	12%	45%	100%
Predominantly Associate	0%	11%	13%	15%	22%	39%	100%

Predominantly Bachelor	1%	1%	2%	74%	1%	21%	100%

Table 9. Payment Breakdown by 3-Year CDR – By Total Payments Due (in $000s)

Total Payments Due ($), by Percentage of Payment Due (by 3-Year CDR)						
Type of Institution	30%+ (10%)	26-30% (8%)	22-26% (6%)	18-22% (4%)	15-18% (2%)	Total
Public	$0	$100	$200	$100	$100	$500
Private Not For-Profit	$800	$1,100	$800	$300	$200	$3,200
Private For Profit	$4,400	$5,100	$17,700	$19,000	$1,100	$47,300
Total	$5,200	$6,300	$18,700	$19,400	$1,400	$51,000
Predominantly Certificate	$4,500	$4,600	$6,100	$4,400	$1,000	$20,600
Predominantly Associate	$0	$1,200	$10,900	$700	$300	$13,100
Predominantly Bachelor	$700	$500	$1,700	$14,300	$100	$17,300
Total	$5,200	$6,300	$18,700	$19,400	$1,400	$51,000

Table 10. Payment Breakdown by Pell 3- or 6-Year Graduation Rates – By Number of Schools Affected

Number of Schools Affected, by Percentage of Payment Due (by Pell Graduation Rates)							
Type of Institution	<10% (10%)	10-20% (8%)	20-30% (6%)	30-40% (4%)	40-50% (2%)	>50% (0%)	Total
Public	3	3	4	2	3	7	22
Private Not For-Profit	0	7	16	14	22	28	87
Private For-Profit	0	4	10	18	30	196	258
Total	3	14	30	34	55	231	367
Predominantly Certificate	1	2	4	10	27	183	227
Predominantly Associate	2	7	14	14	9	29	75

Predominantly Bachelor	0	5	12	10	18	19	64
Total	3	14	30	34	54	231	366

Table 11. Payment Breakdown by Pell 3- or 6-Year Graduation Rates – By Number of Full-Time Equivalent Students in Affected Schools

Number of Full-Time Equivalent Students, by Percentage of Payment Due (by Pell Graduation Rates)							
Type of Institution	<10% (10%)	10-20% (8%)	20-30% (6%)	30-40% (4%)	40-50% (2%)	>50% (0%)	Total
Public	5,257	4,324	6,261	3,637	4,671	5,254	29,404
Private Not For-Profit	-	7,711	19,992	13,162	29,120	41,161	111,146
Private For-Profit	-	2,512	257,100	8,968	6,742	77,125	352,447
Total	5,257	14,547	283,353	25,767	40,533	123,540	492,997
Predominantly Certificate	611	1,165	830	2,284	7,949	69,724	82,563
Predominantly Associate	4,646	6,966	15,565	12,253	9,351	15,695	64,476
Predominantly Bachelor	-	6,416	266,958	11,230	23,155	38,121	345,880
Total	5,257	14,547	283,353	25,767	40,455	123,540	492,919

Table 12. Payment Breakdown by Pell 3- or 6- Year Graduation Rates – By Percentage of Full-Time Equivalent Students in Affected Schools by School Type

Percentage of Full-Time Equivalent Students, by Percentage of Payment Due (by Pell Graduation Rates)						
Type of Institution	<10% (10%)	10-20% (8%)	20-30% (6%)	30-40% (4%)	40-50% (2%)	>50% (0%)
Public	100%	30%	2%	14%	12%	4%
Private Not For-Profit	0%	53%	7%	51%	72%	33%
Private For-Profit	0%	17%	91%	35%	17%	62%

Total	100%	100%	100%	100%	100%	100%
Predominantly Certificate	12%	8%	0%	9%	20%	56%
Predominantly Associate	88%	48%	5%	48%	23%	13%
Predominantly Bachelor	0%	44%	94%	44%	57%	31%
Total	100%	100%	100%	100%	100%	100%

Table 13. Payment Breakdown by Pell 3- or 6- Year Graduation Rates – By Percentage of Full-Time Equivalent Students in Affected Schools by Payment Due

Percentage of Full-Time Equivalent Students, by Percentage of Payment Due (by Pell Graduation Rates)							
Type of Institution	**<10% (10%)**	**10-20% (8%)**	**20-30% (6%)**	**30-40% (4%)**	**40-50% (2%)**	**>50% (0%)**	**Total**
Public	18%	15%	21%	12%	16%	18%	100%
Private Not For-Profit	0%	7%	18%	12%	26%	37%	100%
Private For-Profit	0%	1%	73%	3%	2%	22%	100%
Predominantly Certificate	1%	1%	1%	3%	10%	84%	100%
Predominantly Associate	7%	11%	24%	19%	15%	24%	100%
Predominantly Bachelor	0%	2%	77%	3%	7%	11%	100%

Table 14. Payment Breakdown by Pell 3- or 6- Year Graduation Rates – By Total Payments Due (in $000s)

Number of Full-Time Equivalent Students, by Percentage of Payment Due (by Pell Graduation Rates)						
Type of Institution	<10% (10%)	10-20% (8%)	20-30% (6%)	30-40% (4%)	40-50% (2%)	Total
Public	$400	$200	$800	$600	$200	$2,200
Private Not For-Profit	$0	$500	$2,100	$500	$400	$3,500
Private For-Profit	$0	$2,300	$31,100	$2,600	$5,000	$41,000
Total	$400	$3,000	$34,000	$3,700	$5,600	$46,700
Predominantly Certificate	$100	$100	$100	$300	$2,000	$2,600
Predominantly Associate	$300	$500	$4,500	$3,000	$3,400	$11,700
Predominantly Bachelor	$0	$2,400	$29,400	$400	$200	$32,400
Total	$400	$3,000	$34,000	$3,700	$5,600	$46,700