THE STATE ROLE IN HIGHER EDUCATION QUALITY ASSURANCE

Brief: A New Model for GI Bill© Quality Assurance: An Overview of the Risk-Based Review System

Nathan Arnold, Meghan-Joy Woodall, Joe Wescott, Jessica Morales, Joe Fretwell, Beth Stein, and Bethany Little [i]

Key to Know

Over the past 20 years, numerous schools have closed without warning, leaving student veterans without degrees and few options. But by implementing a new risk-based review system, state agencies will for the first time target their reviews to the riskiest schools most likely to leave veterans worse off, help students finish their studies if their school may be at risk of closure, and push schools to improve or risk losing GI Bill dollars if they continually fail to offer veterans a meaningful path to economic advancement. Most important is that this new system is built on public data and designed so that states can evaluate program risk regardless of sector. This means that this model is a critical proof point for how states can protect all students, not just veterans.

For the past two decades, veterans and their families have been hurt by risky colleges and other postsecondary training programs because of the generous benefits available to colleges through the Post 9/11 GI bill. In 2020 the federal government is spending over $15 billion per year for veterans and their family members to attend college. While much of this investment is well spent, some colleges—especially a particular set of high cost, low-quality for-profit schools—target military-connected students with misleading ads and high pressure sales tactics, sometimes even promising guaranteed jobs and six-figure incomes after graduating. This investment is also put at risk when schools close suddenly. For example, between 2014 and 2018, 88 percent of the 1,230 college closures were for-profit schools that enrolled about 451,000 students, including about 22,000 veterans.[ii] But veterans are also at risk of more indirect harms, like receiving a poor quality education and wasting their hard-earned benefits on a program that doesn't give them the skills need to significantly increase their earning power. And risky schools aren't limited to for-profits—there are schools from every sector have extremely poor student outcomes, with poor rates of retention and that too often fail to lead to the better jobs and higher wages veterans were promised. Colleges across the spectrum can at time pose risks both to student veterans and to the taxpayer programs designed to support these veterans and help them advance.

The State Approving Agencies (SAAs) tasked with overseeing these schools have focused their reviews mostly on financial compliance—do the dollars disbursed by VA to the school match the dollars the school disbursed to students?—and not on whether schools leave student veterans better or worse off. These "compliance surveys," have failed to identify schools that were harming veterans or were dangerously at risk for abrupt closure, leaving students and taxpayers at risk.

Recognizing that the current review system was insufficient to counter the poor outcomes for veterans and risk to taxpayers, Congress in 2017 passed the "Forever GI Bill,"[iii] (or "Colmery Act"), directing the VA and SAAs to conduct "risk-based" reviews—evaluating whether a school was likely to leave students better or worse off, and if taxpayers were getting a good return on their investment. In the two years since passage, there has been very limited implementation of reviews. But with support from Lumina Foundation and pro bono support from Nelson, Mullins, Riley, and Scarborough, EducationCounsel and the National Association of State Approving Agencies (NASAA) have created a first-of-its-kind GI Bill institutional risk model and are executing a six-state pilot. This model has received buy-in from VA, the SAAs, the Hill, and a diverse 22-member advisory council representing veterans, schools, accreditors, states, and other experts. What is most exciting is not only how this model can identify risk to student veterans and taxpayers, it could also be a critical proof point for risk-based quality assurance in state oversight for higher education broadly. By using public data to identify the colleges that pose a high risk to students, the model could save your states significant resources and target oversight to the schools in your state likeliest to leave students worse off, regardless of whether they are veterans.

Background: The GI Bill and State Approving Agencies

Since 1944, the GI Bill has provided qualifying Veterans grants to cover all or some of the costs for school or training.[iv] The modern-day GI Bill, which was enacted in 2008 and is commonly referred to as the Post-9/11 GI Bill, provides assistance for tuition and fees, books and supplies, and housing. According to the U.S. Department of Education, 1.1 million undergraduates were classified as "military students" in 2015-16, and the average grant award was $15,100.

State Approving Agencies (SAAs) are responsible for the review and approval of which higher education institutions and programs are eligible to enroll military students with GI Bill benefits. While traditionally accredited institutions are eligible to enroll GI Bill beneficiaries, many other types of educational programs are also eligible regardless of their accreditation status, including flight schools, beauty schools, and on-the-job training programs. Educational facilities are approved by the SAAs. SAAs are authorized in federal law, but are state employees who are contracted by VA to conduct approvals and oversee schools in the state that are approved to receive GI Bill benefits. This complex structure, shifting directives, and an accompanying lack of funding have left SAAs largely unable to consistently identify and address colleges or facilities that pose risk to veteran students and to taxpayers.

Risky Schools and Their Focus on Veterans

Military connected students have been particularly attractive to colleges for years because of their generous benefit packages.[v] Yet, the current structure of the VA Compliance Survey process through the SAAs puts very little focus on elements like misleading and deceptive advertising and enrolment practices, exceptionally low completion rates and attainment of required credentials and licenses , increased earning power or program quality. Instead, compliance reviews have been directed to focus almost entirely on payment accuracy to the exclusion of the overall financial health, academic quality, employment outcomes, or rapid

growth or contraction of the college. The absence of a cop on the beat has led to both a proliferation of low-quality programs and a higher proportion of veterans exposed to schools abruptly closing their doors.[vi]

To be clear, there are schools that do very well by the veterans they enroll, and do not present significant risk to students or taxpayers. However, some educational programs—from all sectors of higher education—do not benefit their students and can actively harm them, presenting different levels of risk. There are primarily four types of risk: (1) a lack of administrative capacity to be able to run a school effectively or prepare students for jobs, (2) a risk of closure due to financial considerations including drops in enrollment and (3) high-cost, low-quality colleges that leave veterans with wasted GI Bill dollars they can't get back and even being left saddled with debt in some cases. All three of these different type of risk presents different needs for review.

Finally, there are schools that may continue to enroll outsized numbers of veterans despite poor outcomes and complaints because of aggressive and misleading marketing and recruiting. This last category is particularly concerning not only because of their outcomes, but because of the predatory nature of their enrollment practices mean that market failure alone will not stop these schools from harming students. Indeed, the explosive growth of for-profit colleges during the great recession occurred at the same time that Post 9/11 GI Bill benefits became available, and created a particularly poor set of policy incentives. For-profit colleges are subject to a requirement that at least 10 percent of revenues come from sources other than federal student aid – payments from students themselves or from employers willing to fund additional education for employees. Many were struggling to comply with this requirement—failing to attract even 10 percent of students willing to pay for their education out of pocket or with employer support. Even though GI Bill dollars are funded by taxpayers, the way the law is currently written GI Bill benefits count towards the 10 side of the equation.[vii] The result has been a troubling increase in misleading and deceptive recruiting practices specifically target at veterans, often by high-cost programs at schools that do not always lead to good outcomes or earning for veterans and their families. Numerous independent reports and a comprehensive Senate Committee investigation[viii] have found many instances of predatory behavior, especially on the part of for-profit colleges. This behavior poses significant risk given that it specifically targets veterans.[ix]

Congress Recognizes the Need for a Risk-Based Quality Assurance System

Members of both parties on the Veterans Affairs committees have watched with growing impatience as some schools prey on veterans, capture millions in taxpayer dollars, and too often close with little warning. In response, in 2017, they passed the Colmery Act, which for the first time required SAAs to evaluate the risk of these programs: the risk of poor finances, of harming student veterans, and of leaving taxpayers holding the bag when schools shut down with little warning. The Colmery Act also authorized a modest funding increase for SAAs and mandated the Government Accountability Office issue a report on SAA capacity and performance—finding that a focus on risk was indeed warranted.[x]

Recognizing that "compliance surveys" were insufficient to address the widespread use of misleading and deceptive tactics, the Colmery Act required for the first time that state approving agencies evaluate the risk that schools approved to disburse GI Bill funds pose to students and taxpayers. This is the first time such a robust requirement for risk-based reviews was passed in any higher education context—so it provides a key opportunity to test risk-based reviews for higher education more generally, in addition to helping to protect veterans. For two years after passage of the law, little progress was made. VA and the SAAs did not have experience designing and creating a risk-based system from scratch, and there was not a clear and publicly transparent precedent that could be used as a model. In response, NASAA recognized the need for a dedicated team to design, build, pilot, and scale a quantitative model that evaluates programs based on risk to veterans and taxpayers, and focused limited resources on those programs evincing the highest level of risk—with attendant requirements for improvement or risk of loss of GI bill eligibility.

The NASAA Risk-Based Review Model and Pilot

To design this process, we regularly convened an advisory council of 22 members representing a diverse set of interests and perspectives across higher education and the veterans community (see Appendix C); integrated feedback from dozens of policy experts, researchers, advocates, and practitioners; worked closely with several SAAs to understand their capacity and perspectives on risk; and researched examples and precedents in other contexts, such as predicting housing foreclosure risk, financial oversight of publicly traded companies, and others.

The risk-based review process is a system that separates low-risk schools from high-risk schools using quantitative publicly available measures of risk and then prioritizes further data requests and site visits to those schools showing the highest levels of risk. The system uses publicly available date to automate the process of ranking programs in a state from most to least risky. This allows SAAs to conduct risk-based reviews focused on those programs most likely to present risk to students and taxpayers. A risk-based review is premised on the idea that some schools pose less risk than others and limited SAA resources should be focused on schools that pose a greater level of risk. But because SAAs do not have unlimited capacity to execute a deep and focused review of every single educational program in their state each year, there must first be a process that allows SAAs to initially assess the risk of all of the GI-Bill eligible programs in a state. (For a full description of the system, See Appendix A and B.)

As of October 2020, we are beginning a pilot of this system with six states, where for the first time SAAs will systematically be conducting reviews examining specific areas of risk relating to finances, enrollment, student outcomes, and other success measures beyond solely keeping track of payment of correct grant amounts. Success of this pilot is contingent on execution and implementation of a newly created system among regulators who have never before evaluated programs based on risk, all in the midst of a once-in-a-century pandemic. We must ensure pilot states can get the cooperation of their partner regulators, adequately assess the data reported by educational programs, and conduct the site visits in a consistent manner that identifies and addresses risky schools and teaches us what needs to be adjusted before scaling the model nationwide. Beginning in August 2021, we will have the opportunity to evaluate and improve the model based on the pilot and then expand and execute the model at national scale with all states.

This will truly begin to have transformative impact when we are evaluating all GI bill programs in the nation on the basis of risk.

The Impact for Your States

Certainly, the most critical value provided of this work is the direct positive impact on veterans and their families, and how it will allow SAAs to prioritize their resources on schools that pose the most risk to taxpayers and to military-connected students, rather than a narrower focus on payment compliance.

What is most potentially impactful for your work and your state is that the pilot SAAs are evaluating the risk of the majority of their programs on the basis of publicly available data. That means that to the extent that you want other agencies in your state to start evaluating educational institutions on the basis of risk, they could do so right now, with a bit of effort—and at the conclusion of this pilot we expect to have significant tools and materials to help aid your states in doing so. There is currently a wide range of types of state agencies and their level of oversight, and this is a method by which states with fewer resources can focus limited time and budget on those schools presenting the highest degree of risk to students and taxpayers. More importantly, this creates time and money savings for the high-performing schools in your state, who will be less likely to be subject to reviews based on risk.

During the several months of designing this system and pilot, we have learned a number of lessons we also think are key for state policymakers:

Data availability and quality are key: Without data, there is nothing to build risk model on and nothing to distinguish high risk from low risk schools from one another. Some metrics are only available for certain types of programs, and some data are poorly reported, limiting which metrics can be used in a risk filter. A repeal of the 2008 ban on a student-level data network would provide policymakers with a more complete picture of student outcomes to construct a more precise risk model.

Better coordination is needed within and among states: Many problems we see share a common denominator: a need for better communications among actors within a state and among states generally. Often, bad actors fall through the cracks because of lack of coordination because multiple agencies responsible for different components of a school's compliance aren't aware that other agencies are finding other problems with the same school, failing to see the big picture of a school in trouble on multiple fronts. Lack of coordination leads to lack of clear responsibility, where even in obviously harmful situations different oversight bodies wait for others to act first. SAAs need to share data with state authorizers, attorneys general, accreditors, licensing bodies, and vice versa on an automated basis so that problems are identified early. Governors' offices can help forge these connections and responsibilities, but ultimately we need a national solution to ensure consistency of data, coverage of multistate schools, and connection to federal benefits like GI Bill and Pell Grants.

We need a system that fits the real world: When designing a risk-based system, policy perfection often gives way to the reality of what regulators are capable of implementing. This means adjusting the number of reviews and extent of data requests, given that some SAAs have more than a dozen employees and others have only one full-time staffer. This also emphasizes the importance of focusing on risk and following up on high priority schools: with limited budgets and time, we need to focus reviews and staff on the areas of inquiry that matter—completion, debt, earnings, risk of closure, complaints, and misleading claims—and on the programs impacting the most students. And with the impact of COVID, it becomes even more important to design a system that accounts for changes to employment, earnings, enrollment, and overseeing schools when in-person site visits are impracticable.

Finally, we hope to provide you all with more information at the conclusion of this pilot, including:

Which metrics are most predictive of risk: We designed a risk filter that is purposefully overinclusive of metrics to determine which ones have highest predictive validity of actual poor performance upon closure review, which are negatively correlated, and which metrics can be streamlined because they have strong correlation with other, more reliable metrics.

Automating communication: Rather than relying on relationships and good memories of staff, are there ways that interagency data sharing and warning systems can be made automatic?

What needs to be changed: By putting this into practice in reality and not just in theory, the SAAs will learn valuable information about what needs to change and improve to both scale this model from a six state pilot to a national model next year.

Appendices

Appendix A: Advisory Council Members and Pilot States

Appendix B: Overview of Risk Based Review Process

Appendix C: Risk Based Review Pilot: Metrics Taxonomy

Appendix D: Example Output of Section I Risk Filter

Appendix E: Example Tabulation of Risk Scores

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[i] Prepared for the National Governors Association on behalf of the National Association of State Approving Agencies, EducationCounsel, and Lumina Foundation.

[ii] Veterans Education Success Report: VA and States Should Act on Early Warning Signs When Risks to GI Bill Beneficiaries and Taxpayers Emerge at Participating Schools https://vetsedsuccess.org/va-and-saas-should-act-on-early-warning-signs-when-risks-to-gi-bill-beneficiaries-and-taxpayers-emerge-at-participating-schools/

[iii] Harry W. Colmery Veterans Educational Assistance Act of 2017 (P.L. 115-48)

[iv] https://www.va.gov/education/about-gi-bill-benefits/

[v] https://sites.ed.gov/naciqi/files/2018/05/Complete-History-Series.pdf

[vi] Veterans Education Success Report: Overemphasis on Payment Accuracy Impedes More Effective SAA Oversight of Schools Participating in the GI Bill https://vetsedsuccess.org/overemphasis-on-payment-accuracy-impedes-more-effective-saa-oversight-of-schools-participating-in-the-gi-bill/

[vii] https://www.brookings.edu/wp-content/uploads/2019/01/ES_20190116_Looney-90-10.pdf

[viii] https://www.help.senate.gov/imo/media/for_profit_report/Contents.pdf

[ix] Veterans Education Success Report: VA Still Not Enforcing 1974 Ban on Schools that Engage in Deceptive Advertising and Recruiting https://vetsedsuccess.org/va-still-not-enforcing-1974-ban-on-schools-that-engage-in-deceptive-advertising-and-recruiting/

[x] https://www.gao.gov/assets/700/695462.pdf

APPENDIX A – ADVISORY COUNCIL MEMBERS AND PILOT STATES

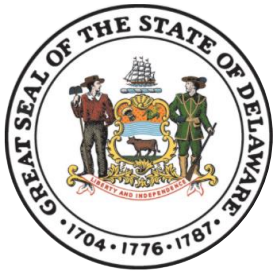
In developing the risk-based review process, we consulted with several researchers, policy experts, and veterans' advocates. Chief among these efforts to gather feedback and input from experts in the veterans and higher education fields was the establishment of an Advisory Council of 22 members representing a diverse set of perspectives, interests, and experiences. This group met regularly to discuss the priorities and effective design of a risk-based system and pilot. The Advisory Council provided critical input and feedback, but their participation in this effort does not imply individual or organizational endorsement. We thank the following members of the Council for their important contributions:

NASAA Veterans Advisory Council

Accrediting Commission of Career Schools and Colleges	Michale McComis
American Association of Collegiate Registrars and Admissions Officers	William Gil
American Council for Education	Anne H. Meehan
American Legion	Joseph Sharpe
Center for American Progress	Antoinette Flores, Ben Miller
Distance Education Accrediting Commission	Leah Matthews
National Association of Independent Colleges and Universities	Stephanie Giesecke
National Association of Student Financial Aid Administrators	Jill Desjean
National Association of Veterans' Program Administrators	Dr. Jan Del Signore
New America	Clare McCann
New Jersey Office of the Secretary of Higher Education	Zakiya Smith Ellis
New Mexico State Approving Agency for Veterans' and Training	Marilyn Dykman, Katherine Snyder
New York State Division of Veterans' Services	William Clarke
State Higher Education Executive Officers Association	David Tandberg
Student Veterans of America	Lauren Augustine
The Education Trust	Dr. Kayla C. Elliott
University of Phoenix	Patrick Sutliff
Veterans Education Success	Carrie Wofford, Tanya Ang
WASC Senior College and University Commission	Jamienne S. Studley
Washington State Approving Agency	John Murray

Pilot SAA States

Texas, Illinois, New York, Delaware, Virginia, Nevada



SECTION I | SECTION II | SECTION III | SECTION IV

APPENDIX B – OVERVIEW OF RISK-BASED REVIEW PROCESS

All Eligible GI Bill Programs

RISK BASED FILTER
Automated Process and Risk Designation

Risk Filter for Unaccredited Non-Degree Institutions Using Public, SAA, and VA Data (see Table 2 on page 7)

Risk Filter for Accredited Institutions Using Public Data (see Table 1 on page 5)

Deeper Risk Based Review

Priority 1
~25%

Additional Private Data Requests
- Report open state, federal, or authorizing entity investigations
- GI bill recipient complaints
- Financial records
- [other metrics]

Additional Steps
- All these programs are reviewed deeper
- Request for further documentation
- Site visit is scheduled
- Demonstrate continuous improvement in specific timeframe

Deeper Risk Based Review

Priority 2
~50%

Additional Private Data Requests
- Report open state, federal, or authorizing entity investigations
- GI bill recipient complaints
- [other metrics]

Additional Steps
- Random sample of 25% of these programs are reviewed
- Request for further documentation
- Propose site visit if necessary
- Follow-up after X amount of time
- Demonstrate continuous improvement in specific timeframe

75% Of Programs Not Reviewed in Section II This Cycle

Deeper Risk Based Review

Priority 3
~25%

Additional Steps
- Random sample of 5% of these programs reviewed
- Request for further documentation
- Demonstrate continuous improvement in specific timeframe

95% Of Programs Not Reviewed in Section II This Cycle

Potential Consequences

- ☐ Mandatory School Official Training
- ☐ Program Suspension (i.e. Disapprove New GI Bill Enrollments)
- ☐ Withdrawal of Program (i.e. Discontinue All GI Bill Payments)
- ☐ Require demonstration of improved performance on specified metrics within particular timeframe
- ☐ Continuation of GI Bill participation pending no further detrimental performance
- ☐ No corrective action required based on satisfactory SAA review

Subsequent Actions

- Mandatory re-review in 1yr including follow-up site visit
- Possible re-review in 2 yrs depending on demonstrated performance improvement
- No mandatory further review required based on a satisfactory deeper review
- Ineligibility period for programs that are disapproved, as needed

APPENDIX B – OVERVIEW OF RISK-BASED REVIEW PROCESS

Purpose of Risked Based Approach

The purpose of taking a risk-based approach to review of schools receiving federal GI bill benefits for the purpose of educating the nation's veterans is to focus the SAA's resources on the mitigation of risks to the regulatory objectives of the GI Bill, and to use the SAA's resources in the most efficient manner possible. The SAAs use a standard risk assessment process, both initially and on a continuing basis, applied consistently across all schools, and conduct in-person reviews of schools based on the outcome of the assessment. The approach to risk assessment of specific schools receiving GI Bill dollars is to be based on the extent to which the school poses risk to veterans and to the taxpayer investment being made in the school.

The risk assessment process and the review seek to consider both the probability and the impact of the potential risk to students and taxpayers of such events as precipitous school closure and predatory recruiting tactics and other practices that lead to poor outcomes and earnings for veterans. The probability of risk depends on factors including the environment within which schools operate and the internal systems and controls designed to mitigate such risks. In order to create incentives for schools to maintain and improve access, affordability, high levels of completion and increased earnings for student veterans, and to demonstrate financial integrity in the handling of taxpayer resources, it is important that schools understand the SAA's evaluation of its risk and be transparent in undergoing review.

Overview of the Draft Risk-Based Review System Proposal

Section I, Risk-Based Filter: Each SAA collects publicly-available metrics for all GI-Bill eligible programs in its state (in the case of unaccredited programs, where data may not be publicly available, these programs may electronically report these key metrics directly to the SAA). Based on the performance on these indicators, all the programs are categorized into one of three risk tiers: Priority 1 (about 25% of programs), Priority 2 (about 50% of programs), and Priority 3 (about 25% of programs).

Section II, Deeper Risk-Based Review: Based on the risk category a program is assigned to, it will undergo different levels of additional review, with all Priority 1 programs getting additional deeper review. The scope of this review can depend on the capacity of the SAA and the type of program being evaluated (e.g. size, mission, dollars received, etc.) but will typically include additional requests for data that are not publicly available, site reviews, interviews with staff, or written explanations. Some (likely randomly chosen) Priority 2 programs and a small number of Priority 3 programs will also receive deeper review but given the relatively lower risk profiles and limited SAA capacity to conduct deeper reviews, several Priority 2 and 3 programs will not undergo such deeper risk-based reviews in a given year.

Section III, Potential Consequences: Depending on the findings of the deeper review, various types of consequences may be justified and carried out by the SAA. Some reviews will find the initial risk factors were not actually indicative of heightened risk and no reason for corrective action is warranted. Other reviews, however, will find academic shortcomings, financial noncompliance, or other harmful behaviors that necessitate action on the part of the SAA.

Section IV, Subsequent Actions: Some problems discovered by SAAs in a given review year may not be quickly resolvable. Other problems may be resolved but the SAA still has sufficient concerns about the abilities and capacity of the program that a subsequent year review is needed, regardless of the program's performance on the risk-based filter in the following year.

What is a Risk-Based Filter and Why is it Needed?

The purpose of a risk-based filter (Section I of the flow chart) is to better *identify* and *focus resources* on schools that pose the most risk to taxpayers and to military-connected students. A risk-based review is premised on the idea that some schools pose less risk than others, and that limited State Approving Agency (SAA) resources should be focused on schools that pose a greater level of risk. But because SAAs do not have unlimited capacity to execute a deep and focused review of every single educational program in their state each year, there must first be a process that allows SAAs to initially assess the risk of all of the GI-Bill eligible programs in a state and determine which pose a greater risk than others—and therefore, which programs an SAA should prioritize for deeper review and site visits. Under current practice, there is no transparent process that establishes which schools pose the greatest risk and thus should receive the most attention from the SAAs.

The goal of the risk-based filter is not to conclusively determine that a school is out of compliance or is not serving students effectively. The purpose of the filter is only to determine that the school merits a closer look. Thus, the metrics used to assess the risk level of a school in a risk filter are not, by themselves, grounds for action by an SAA against a school.

In order to be usable by SAAs, the risk-based filter should be composed of metrics that are relatively easy to access. The Colmery Act lists seven example factors that could be included in analyzing risk. Several of the metrics set out in the Colmery Act (enrollment, outcomes, default rates, numbers of complaints, previous SAA compliance issues) are specific only to veterans. While the veteran specific metrics are not always easily available, it is possible to access these metrics for the total student population. While these factors can likely be used in a risk screen to identify programs at risk, additional Colmery factors may work more effectively during a deeper review following the risk-based filter (a "risk-based review"). This Advisory Council may recommend some additional factors that could also help to identify and assess the risk level posed by schools as part of the risk-based filter and/or part of the risk-based reviews.

We also note that many factors this Advisory Council could consider for a risk-based filter (including some of the example metrics in the Colmery Act) are only publicly available for accredited programs, whereas SAAs also have authority over many unaccredited programs, which are not reviewed by accreditors, the U.S. Department of Education, or many other regulatory bodies. It will be important for this Advisory Committee to consider which risk-based filter metrics are most effective—and in the case of unaccredited programs, most feasible to obtain—to ensure that both accredited and unaccredited programs receive the appropriate level of review from SAAs.

Risk-Based Review Pilot: Metrics Taxonomy

As described in the accompanying flow chart (Appendix B), NASAA's Risk-Based Review Pilot relies heavily on collection and review of publicly available, SAA-specific, and school-provided data. This document outlines the metrics used to prioritize schools based on predicted risk level (Section I).

Section I Risk Filter

Because of limited publicly available data, particularly for facilities that are not accredited but are approved to enroll GI Bill beneficiaries, two methods of initial data analysis occur to complete the Section I Risk Filter. Table I displays metrics collected on accredited facilities for which sufficient publicly available data exists. These are generally Institutions of Higher Learning (IHLs), but some Non-College Degree (NCD) facilities are also included. Table II has significantly fewer metrics included, largely because limited publicly available data exists for these facilities, and only limited consistent and comparable information is available via SAAs and/or federal agencies. Facilities reviewed using metrics in Table II are generally unaccredited NCDs and IHLs. Metrics notated in **bold** serve as automatic triggers. Any facilities not identified in Priority 1 through the Section I risk filter that receive a "yes" on one or more triggers are automatically prioritized for review.

Table 1. Metrics for Review of Accredited IHL and NCD Facilities with Sufficient Publicly Available Data

Source	Metric Name	Definition
SAA	Multi-state facility	Facilities that enroll students on a national basis from multiple states and may have campuses in multiple states.
SAA	**Newly approved**	Facilities that have been approved by the SAA in the last year
SAA	**Change of ownership**	Facilities that have undergone a change of ownership in the last year
SAA	Expanded Audit/Training	Facilities that received an expanded audit as a result of substantial compliance findings or required additional training as a result of a compliance survey in the last two years
SAA	**Suspension**	Facility has been suspended by the SAA or the VA within the last three years
SAA	Withdrawn Approval	Facility has been withdrawn by the SAA in the last three years

APPENDIX C – Risk-Based Review Pilot: Metrics Taxonomy

SAA	**Seeking change in status**	Any facility seeking a change in tax exempt status (e.g., converting from for-profit to nonprofit)
SAA	**Facility is under investigation**	Any facility where there has been a public disclosure that the facility or its owners are: ● Under investigation by a federal, state or local agency ● Named in a pending qui tam or false claims lawsuit ● Audited by the VA, ED agency, or OIG in the previous two years.
Public Source	Heightened Cash Monitoring Status	Whether the institution is actively flagged by the US Department of Education as HCM 1 or 2 for financial vulnerability
Public Source	Cohort Default Rate	Percentage of borrowers who defaulted on loans within three years of completion
Public Source	Program graduate to state high school graduate earnings ratio	Ratio of median program graduate earnings to state median non-college-going high school graduate (ages 25-34)
Public Source	Percent VA Enrollment	Percentage of students using the GI Bill compared to the overall enrollment
Public Source	Enrollment change (2 year)	Percent change in total enrollment of all undergraduate and graduate programs over two years
Public Source	Enrollment change (1 year)	Percent change in total enrollment of all undergraduate and graduate programs over one year
Public Source	Instructional spending	Percentage of total revenue collected from tuition and fees spent on instructional costs. Instructional costs are defined as the sum of all operating expenses associated with colleges, schools, departments, and other instructional divisions, as well as departmental research and public service expenditures not separately budgeted.
Public Source	Veteran complaints	Total complaints reported to the VA via GI Bill Feedback System
Public Source	Tuition change (2 year)	Percent change in tuition and fees over two years
Public Source	Tuition change (1 year)	Percent change in tuition and fees over one year
Public Source	Completion Rate (All Students)	Completion rate for first-time, full-time students at four- and less-than-four-year institutions (150% of expected time to completion)
Public Source	Completion Rate (Pell students)	Completion rate for first-time, full-time students using Pell Grants at four- and less-than-four year institutions (150% of expected time to completion)

Public Source	Completion Rate Gaps by race	Gaps in completion rates between White and Black students and White and Latino students.
Public Source	Full-time retention rate	Percent of first-time, full-time undergraduate students who were enrolled at the institution in the fall one year after matriculation
Public Source	Part-time retention rate	Percent of first-time, part-time undergraduate students who were enrolled at the institution in the fall one year after matriculation
Public Source	Average net price	The average annual total cost of attendance, including tuition and fees, books and supplies, and living expenses, minus the average grant/scholarship aid

Table 2. Metrics for Review of Unaccredited IHL and NCD Facilities that Lack Sufficient Publicly Available Data

Source	Metric Name	Definition
SAA	Multi-state facility	Facilities that enroll students on a national basis from multiple states and may have campuses in multiple states.
SAA	**Newly approved**	Facilities that have been approved by the SAA in the last year
SAA	**Change of ownership**	Facilities that have undergone a change of ownership in the last year
SAA	Expanded Audit/Training	Facilities that received an expanded audit as a result of substantial compliance findings or required additional training as a result of a compliance survey in the last two years
SAA	**Suspension**	Facility has been suspended by the SAA or the VA within the last three years
SAA	Withdrawn Approval	Facility has been withdrawn by the SAA in the last three years
SAA	**Seeking change in status**	Any facility seeking a change in tax exempt status (e.g., converting from for-profit to nonprofit)
SAA	**Facility is under investigation**	Any facility where there has been a public disclosure that the facility or its owners are: ● Under investigation by a federal, state or local agency ● Named in a pending qui tam or false claims lawsuit

APPENDIX C – Risk-Based Review Pilot: Metrics Taxonomy

		• Audited by the VA, ED agency, or OIG in the previous two years.
SAA or VA	Enrollment	Total student enrollment and veterans' enrollment for 3-year period
SAA or VA	Completion Rates	For programs starting 9/1/17 or later and completing by 9/1/20, the number of students who enrolled in and completed each program.
SAA or VA	Tuition/Cost	Tuition and fees for each program for past 3 years
SAA or VA	85/15 Compliance	Number of veterans enrolled in each program for the past 2 years unless the facility has a waiver from VA.
SAA or VA	Complaints	Number of veterans complaint available through the VA Feedback System
SAA or VA	GI Bill Refunds	Number of veterans who enrolled but did not complete their program and subsequently received pro-rata refunds for past 2 years
SAA or VA	Spending on Instruction	Total Revenue of the facility and revenue spent on faculty salaries and benefits not including any amount paid to an owner or family member of owner

Technical Description of Section I Risk Filter: How Does it Work?

The Section I Risk Filter relies on both SAA-provided and publicly available data to prioritize facilities based on predicted cumulative risk levels across 21 metrics. Each facility in the state receives a risk "score" ranging from 0 to 1.5 for each of the 21 metrics, and each facility is given a total risk score based on the sum total of all risk metrics. Risk scores are determined in comparison to the distribution of data in the state, meaning facilities are only compared to other facilities in the state.

Risk scores are assigned using percentiles. If a facility's outcome on any of these metrics is among the poorest 10% in the state, it receives a score of 1.5 for that individual metric. Facilities in the next riskiest 15 percentiles (generally the 75th to 90th percentile) receive a 1.0, and those

in the middle 50 percentiles (between the 25th and 75th) receive a 0.5. Schools faring in the best 25th percentile receive no score, or a 0.0, for the metric. Risk scores are then summed across each of the 21 metrics to calculate a total risk score for each school. In instances where a facility is missing data for an individual metric, an estimated risk score is calculated using a weighted average formula determining risk levels across all metrics for which the facility did have data available. Cutoff scores are then calculated based on the range of scores in the state. Generally, the top 25% of risk scores are categorized as Priority 1, the middle 50% as Priority 2, and the bottom 25% as Priority 3.

The following appendices (D and E) display the de-identified example output of the Section I Risk Filter developed for Nevada's Accredited IHL and NCD Facilities with Sufficient Publicly Available Data. Appendix D shows the final output of the model, with schools categorized into priorities 1, 2, and 2. The tabulation of risk scores is shown in Appendix E. Raw data is shown in columns highlighted in white and labeled with the metric name (e.g., PctVAEnroll), and calculated risk scores for each metric are displayed in columns shaded in red labeled as "Metric Name_risk" (e.g., PctVAEnroll_risk). The final column on Page 5 of Appendix E represents the cumulative risk score across all metrics.

APPENDIX D – Example Output of Section I Risk Filter (Page 1 of 1)

FACCODE	UNITID	OPEID	OPEID6	INSTNM	STABBR	AdjRiskScore	Z-score	PriorityLvl	TRIGGER
A1	B1	C1	D1	Facility 1	NV	17.00	2.5642	Priority 1	Suspenion
A2	B2	C2	D2	Facility 2	NV	16.18	2.3294	Priority 1	
A3	B3	C3	D3	Facility 3	NV	14.52	1.8566	Priority 1	
A4	B4	C4	D4	Facility 4	NV	12.44	1.2652	Priority 1	
A5	B5	C5	D5	Facility 5	NV	12.00	1.1385	Priority 1	
A6	B6	C6	D6	Facility 6	NV	10.50	0.7107	Priority 1	
A7	B7	C7	D7	Facility 7	NV	9.85	0.5259	Priority 2	Suspenion
A8	B8	C8	D8	Facility 8	NV	9.71	0.4843	Priority 2	
A9	B9	C9	D9	Facility 9	NV	9.56	0.4434	Priority 2	
A10	B10	C10	D10	Facility 10	NV	9.50	0.4256	Priority 2	Suspenion
A11	B11	C11	D11	Facility 11	NV	9.42	0.4034	Priority 2	Suspenion
A12	B12	C12	D12	Facility 12	NV	9.42	0.4034	Priority 2	
A13	B13	C13	D13	Facility 13	NV	9.33	0.3781	Priority 2	
A14	B14	C14	D14	Facility 14	NV	8.83	0.2355	Priority 2	Suspenion
A15	B15	C15	D15	Facility 15	NV	8.67	0.1880	Priority 2	
A16	B16	C16	D16	Facility 16	NV	8.44	0.1226	Priority 2	
A17	B17	C17	D17	Facility 17	NV	8.30	0.0824	Priority 2	
A18	B18	C18	D18	Facility 18	NV	7.78	-0.0655	Priority 2	
A19	B19	C19	D19	Facility 19	NV	7.78	-0.0655	Priority 2	
A20	B20	C20	D20	Facility 20	NV	7.78	-0.0655	Priority 2	
A21	B21	C21	D21	Facility 21	NV	7.55	-0.1307	Priority 2	
A22	B22	C22	D22	Facility 22	NV	7.26	-0.2133	Priority 2	
A23	B23	C23	D23	Facility 23	NV	7.00	-0.2873	Priority 2	
A24	B24	C24	D24	Facility 24	NV	6.74	-0.3612	Priority 2	
A25	B25	C25	D25	Facility 25	NV	6.68	-0.3780	Priority 2	
A26	B26	C26	D26	Facility 26	NV	5.89	-0.6041	Priority 2	
A27	B27	C27	D27	Facility 27	NV	5.39	-0.7457	Priority 3	
A28	B28	C28	D28	Facility 28	NV	5.23	-0.7918	Priority 3	
A29	B29	C29	D29	Facility 29	NV	5.00	-0.8576	Priority 3	
A30	B30	C30	D30	Facility 30	NV	4.58	-0.9782	Priority 3	
A31	B31	C31	D31	Facility 31	NV	4.33	-1.0477	Priority 3	
A32	B32	C32	D32	Facility 32	NV	4.31	-1.0532	Priority 3	
A33	B33	C33	D33	Facility 33	NV	3.27	-1.3511	Priority 3	
A34	B34	C34	D34	Facility 34	NV	3.00	-1.4278	Priority 3	
A35	B35	C35	D35	Facility 35	NV	2.94	-1.4437	Priority 3	
A36	B36	C36	D36	Facility 36	NV	2.08	-1.6892	Priority 3	

Mean	8.01
Median	7.78
StdDev	3.51

	Count	*Pct*
Priority 1	6	16.67%
Priority 2	20	55.56%
Priority 3	10	27.78%

APPENDIX E – Example Tabulation of Risk Scores (Page 1 of 5)

INSTNM	STABBR	HCM	HCM_risk	PctVAEnroll	PctVAEnroll_risk	EnrollDelta_2YR	EnrollDelta_2YR_risk	EnrollDelta_1YR	EnrollDelta_1YR
Facility 1	NV	0	0	0	0	-0.199017199	1.0	-0.1173285199	1.0
Facility 2	NV	0	0	0.3665338645	1.5	-0.4770833333	1.5	-0.3342175066	1.5
Facility 3	NV	0	0	0.03322259136	0.5	-0.506557377	1.5	-0.2917647059	1.5
Facility 4	NV	0	0	0.3171521036	1.5	-0.6336692353	1.5	-0.4288354898	1.5
Facility 5	NV	0	0	0.2934782609	1.5	0.4375	1.0	0.1017964072	0.0
Facility 6	NV	0	0	0.04097116844	0.5	0.5803357314	1.0	0.1460869565	1.0
Facility 7	NV	0	0	0.01488095238	0	-0.4256410256	1.5	-0.2663755459	1.5
Facility 8	NV	0	0	0.03242751793	0.5	0.01810140903	0.0	0.03976723667	0.0
Facility 9	NV	0	0	0.07826086957	1	3.457364341	1.5	0.1363636364	1.0
Facility 10	NV	1	0.5	0.02734375	0.5	-0.1322033898	0.0	-0.1322033898	1.0
Facility 11	NV	0	0	0.02263083451	0.5	-0.1901489118	1.0	-0.1451027811	1.0
Facility 12	NV	0	0	0.0766721044	1	1.009836066	1.5	0.3384279476	1.5
Facility 13	NV	0	0	0	0	-0.1037414966	0.0	-0.1202003339	1.0
Facility 14	NV	0	0	0	0	0.4249201278	1.0	0.2388888889	1.5
Facility 15	NV	0	0	0.1361386139	1	0.5968379447	1.5	0.1253481894	0.0
Facility 16	NV	0	0		0	-0.2044025157	1.0	-0.2203389831	1.0
Facility 17	NV	0	0	0.07322175732	0.5	-0.2059800664	1.0	-0.07003891051	0.0
Facility 18	NV	0	0	0.02805194805	0.5	0.1695018226	1.0	0.1330194232	1.0
Facility 19	NV	0	0	0.009708737864	0	1.746666667	1.5	0.648	1.5
Facility 20	NV	0	0	0.04485049834	0.5	0.1621621622	0.0	0.153256705	1.0
Facility 21	NV	0	0	0.05464071856	0.5	-0.1152317881	0.0	0.07568438003	0.0
Facility 22	NV	0	0	0.1403508772	1	-0.186770428	1.0	-0.02488335925	0.0
Facility 23	NV	0	0		0		0.0	0.3766233766	1.5
Facility 24	NV	0	0	0.02408331525	0.5	0.01475121092	0.0	-0.0276371308	0.0
Facility 25	NV	0	0	0.0182767624	0.5	0.1231671554	0.0	0.06685236769	0.0
Facility 26	NV	0	0	0.2194821208	1.5	0.02398989899	0.0	-0.01338199513	0.0
Facility 27	NV	0	0	0.02932930774	0.5	-0.06700201207	0.0	0.002377864246	0.0
Facility 28	NV	0	0		0	0.06785714286	0.0	-0.00993377483	0.0
Facility 29	NV	0	0	0.01298701299	0	0.1666666667	0.0	0.1323529412	1.0
Facility 30	NV	0	0	0.04460419438	0.5	0.03119892599	0.0	0.01979969406	0.0
Facility 31	NV	0	0	0.01585437463	0	0.1744827586	1.0	0.06838143036	0.0
Facility 32	NV	0	0	0.03291219204	0.5	0.01591580028	0.0	-0.00396400931	0.0
Facility 33	NV	0	0	0.01710816777	0	0.1089351285	0.0	0.0516540917	0.0
Facility 34	NV	0	0		0	0.01351351351	0.0	-0.04051172708	0.0
Facility 35	NV	0	0	0.02524738364	0.5	0.04604702675	0.0	0.01820217265	0.0
Facility 36	NV	0	0		0	0.1388888889	0.0	0.1081081081	0.0

APPENDIX E – Example Tabulation of Risk Scores (Page 2 of 5)

INSTNM	InstrSpend	InstrSpend_risk	StateEarnRatio	StateEarnRatio_	CDR3	CDR3_risk	Complaints	Complaints_risk	TuitionDelta_2Y	TuitionDelta_2Y
Facility 1	0.2461232381	1.00	1.11765824	0.50	0.229	1.00	67	1.50	-0.00557055073	0.50
Facility 2	0.1032275173	1.50	1.67648736	0.00	0.099	0.50	223	1.50	-0.06570388494	0.00
Facility 3	0.6794084174	0.00	1.06063486	0.50	0.261	1.50	3	0.50	0.103117506	1.00
Facility 4	0.2956819458	0.50	1.790534119	0.00	0.123	0.50	578	1.50	-0.2460588235	0.00
Facility 5	0.1690120584	1.50	1.300133055	0.00	0.216	1.00	1	0.50	0.203125	1.50
Facility 6	0.4065921335	0.50	1.049230184	0.50	0.083	0.50	5	1.00	0.1810572687	1.00
Facility 7	0.3413729128	0.50	0.9199771906	1.00	0.131	0.50	0	0.00	0.0873825235	0.50
Facility 8	1.53E+00	0.00	1.22790344	0.50	0.273	1.50	11	1.00	0.2	1.50
Facility 9	0.3766799179	0.50	0.9731990116	1.00	0.232	1.00	0	0.00	-0.128601144	0.00
Facility 10	0.3473043133	0.50	0.6956852309	1.50	0.187	0.50	0	0.00		
Facility 11	0.3084898066	0.50	1.600456187	0.00	0.09	0.50	0	0.00	0.09922953451	0.50
Facility 12	0.09212721647	1.50			0.12	0.50	1	0.50		
Facility 13			0.9884052462	0.50		0.00	2	0.50		
Facility 14			1.098650447	0.50	0.02	0.00	0	0.00		
Facility 15	0.282914243	0.50	2.220110245	0.00	0.035	0.00	4	0.50	0.7784552846	1.50
Facility 16	0.3932372238	0.50	0.6994867896	1.50	0.17	0.50		0.00		
Facility 17	0.1854036655	1.00	0.9655958943	1.00	0.181	0.50	6	1.00	-0.1655321346	0.00
Facility 18	0.8951459309	0.00			0.085	0.50	0	0.00	-0.00641314095	0.50
Facility 19	0.3344909742	0.50			0.272	1.50	0	0.00	0.008745887828	0.50
Facility 20	0.1535372929	1.50	1.041627067	0.50	0.134	0.50	2	0.50	-0.6285235226	0.00
Facility 21	0.4788015221	0.50	1.094848888	0.50	0.07	0.00	9	1.00		
Facility 22	0.7079279599	0.00	1.03402395	0.50	0.22	1.00	0	0.00	0.07187301587	0.50
Facility 23	0.2417660386	1.00				0.00		0.00		
Facility 24	1.891613015	0.00	1.189887854	0.50	0.11	0.50	1	0.50	0.07491408935	0.50
Facility 25	0.4020349996	0.50	0.6500665273	1.50	0.07	0.00	12	1.50	0	
Facility 26	0.2311706676	1.00			0.239	1.50	2	0.50		
Facility 27	1.384972073	0.00	1.159475385	0.50	0.208	0.50	1	0.50	0.0852233677	0.50
Facility 28	0.4927568353	0.50			0.22	1.00		0.00		
Facility 29	0.2582829297	1.00			0.093	0.50	0	0.00		
Facility 30	1.26E+00	0.00	1.710701388	0.00	0.065	0.00	1	0.50	0.1116525129	1.00
Facility 31	0.3486361626	0.50			0.009	0.00	1	0.50		
Facility 32	1.689653643	0.00	1.288728379	0.50	0.144	0.50	1	0.50	0.01821305842	0.50
Facility 33	0.4548984966	0.50			0.01	0.00	0	0.00	0.08053311793	0.50
Facility 34	0.3874735482	0.50			0.11	0.50		0.00		
Facility 35	1.21E+00	0.00	1.78673256	0.00	0.05	0.00	0	0.00	0.06398767852	0.50
Facility 36	0.3658680552	0.50				0.00		0.00	-0.09294391316	0.00

APPENDIX E – Example Tabulation of Risk Scores (Page 3 of 5)

INSTNM	TuitionDelta_1Y	TuitionDelta_1Y	CompletionRate	*CompletionWhi*	*CompletionWhi*	CompletionRate	*CompletionRate*	FTRetentionRat	FTRetentionRat	PTRetentionRat
Facility 1	-0.00539919586	0.00	0.2376	-0.6667	0.1036	1.00	1.00	0.4694	1.50	0.3077
Facility 2	0.1457006952	1.50	0.3333		0.3714	1.00	1.00			
Facility 3	0.103117506	1.50	0.5	0.4849	-0.1515	0.50	1.00	0.5652	1.00	
Facility 4	-0.00038995476	0.00	0.1963	0.2619	0.037	1.50	0.50	1	0.00	
Facility 5	0.1390532544	1.50	0.5714		-0.4286	0.50	0.00	0.75	0.50	0.3333
Facility 6	0	0.50	0.6492	0.1042	-0.1213	0.50	0.00	0.8333	0.00	0.7805
Facility 7	0.05983239135	1.00	0.7132			0.00	0.00	0.7463	0.50	
Facility 8	0.06301369863	1.00	0.0928	0.0659	0.0361	1.50	0.00			
Facility 9	0						0.00	0.92	0.00	0.75
Facility 10			0.5508			0.50	0.00	0.55	1.50	
Facility 11	0.0490823861	1.00	0.4714			0.50	0.00	0.5634	1.50	1
Facility 12			0.6883	0.2461	0.0882	0.00	0.50	0.7409	0.50	
Facility 13			0.7427			0.00	0.00	0.7742	0.50	0.75
Facility 14			0.7076	0.2202	-0.0835	0.00	0.00	0.6901	0.50	
Facility 15	0						0.00			
Facility 16			0.6678			0.00	0.00	0.7455	0.50	
Facility 17	0		0.6197	0.1041	0.0352	0.50	0.00	0.5833	1.00	
Facility 18	-0.00641313409	0.00	0.1862	-0.0944	-0.0689	1.50	0.00	0.6983	0.50	0.3483
Facility 19	-0.00031806615	0.50	0.5547			0.50	0.00	0.9333	0.00	1
Facility 20	-0.01087026852	0.00	0.8108	0.2833	-0.1167	0.00	0.50	0.875	0.00	
Facility 21	0		0.5634	0.2852	0.0749	0.50	1.00	0.6323	0.50	
Facility 22	0.05031107424	1.00	0.5759		-0.0694	0.50	0.00	0.7541	0.50	
Facility 23	-0.03094247743	0.00	0.5854			0.50	0.00			
Facility 24	0.03747927032	0.50	0.3571	0.1975	-0.1346	0.50	0.00	0.625	1.00	0.3043
Facility 25	0		0.612			0.50	0.00	0.7925	0.50	
Facility 26	0.004021717273	0.50					0.00			0.7931
Facility 27	0.03711001642	0.50	0.25	-0.0216	-0.0904	1.00	0.00			
Facility 28			0.6552			0.00	0.00	0.7241	0.50	
Facility 29							0.00			
Facility 30	0.04174820613	0.50	0.4285	0.0888	0.0604	0.50	0.50	0.7593	0.50	0.5385
Facility 31	0.01119127557	0.50					0.00			
Facility 32	-0.03642276423	0.00	0.3037	-0.0606	-0.0483	1.00	0.00			
Facility 33	0.02963362069	0.50					0.00			
Facility 34			0.7624			0.00	0.00	0.9091	0.00	
Facility 35	0		0.5755	0.2422	0.0406	0.50	0.00	0.8073	0.00	0.3269
Facility 36	-0.00142271796	0.00					0.00			

APPENDIX E – Example Tabulation of Risk Scores (Page 4 of 5)

INSTNM	PTRetentionRat	AvgNetPrice	AvgNetPrice_ris	PellCompletion	PellCompletion_	ExpandedAudit	ExpandedAudit	Suspension_3Y	Suspension_3Y	Withdrawal_3YF
Facility 1	1.50	20393	0.50	0.2414	1.00	0.00	0	1.00	1	1.00
Facility 2		30312	1.50	0.2308	1.00	0.00	0	0.00	0	0.00
Facility 3		17899	0.50	0.4286	0.50	1.00	1	0.00	0	0.00
Facility 4		14777	0.50	0.1728	1.50	0.00	0	0.00	0	0.00
Facility 5	0.50	21985	0.50	0.4348	0.50	0.00	0	0.00	0	0.00
Facility 6	0.50	17750	0.50	0.617	0.50	1.00	1	0.00	0	0.00
Facility 7		19688	0.50	0.6809	0.00	0.00	0	1.00	1	0.00
Facility 8		6752	0.00	0.0653	1.50	0.00	0	0.00	0	0.00
Facility 9	0.50	33488	1.50			0.00	0	0.00	0	0.00
Facility 10		17374	0.50	0.5143	0.50	0.00	0	0.00	0	0.00
Facility 11	0.00	24737	1.00	0.5185	0.50	0.00	0	1.00	1	0.00
Facility 12		16253	0.50	0.8797	0.00	0.00	0	0.00	0	0.00
Facility 13	0.50	23095	1.00	0.6364	0.00	1.00	1	1.00	1	1.00
Facility 14		26461	1.00	0.7163	0.00	1.00	1	1.00	1	0.00
Facility 15		36915	1.50			0.00	0	0.00	0	0.00
Facility 16		21839	0.50	0.5576	0.50	0.00	0	0.00	0	0.00
Facility 17		17247	0.50	0.6449	0.00	0.00	0	0.00	0	0.00
Facility 18	0.50	12980	0.00	0.1842	1.50	0.00	0	0.00	0	0.00
Facility 19	0.00	18623	0.50	0.521	0.50	0.00	0	0.00	0	0.00
Facility 20		27641	1.50	0.8111	0.00	0.00	0	0.00	0	0.00
Facility 21		22111	1.00	0.539	0.50	0.00	0	0.00	0	0.00
Facility 22		16361	0.50	0.5731	0.50	0.00	0	0.00	0	0.00
Facility 23		21404	0.50			0.00	0	0.00	0	0.00
Facility 24	1.50	7502	0.00	0.3247	1.00	0.00	0	0.00	0	0.00
Facility 25		14718	0.00	0.5876	0.50	1.00	1	0.00	0	0.00
Facility 26	0.00					0.00	0	0.00	0	0.00
Facility 27		10960	0.00	0.25	1.00	0.00	0	0.00	0	0.00
Facility 28		16561	0.50	0.6154	0.50	0.00	0	0.00	0	0.00
Facility 29						0.00	0	0.00	0	0.00
Facility 30	0.50	10551	0.00	0.3795	0.50	0.00	0	0.00	0	0.00
Facility 31						0.00	0	0.00	0	0.00
Facility 32		8072	0.00	0.3403	0.50	0.00	0	0.00	0	0.00
Facility 33						0.00	0	0.00	0	0.00
Facility 34		14970	0.50	0.7541	0.00	0.00	0	0.00	0	0.00
Facility 35	1.00	14122	0.00	0.4821	0.50	0.00	0	0.00	0	0.00
Facility 36						0.00	0	0.00	0	0.00

APPENDIX E – Example Tabulation of Risk Scores (Page 5 of 5)

INSTNM	Withdrawal_3YF	ChangeOwnersl	ChangeOwnersl	MultiState	MultiState_risk	NewlyApproved	NewlyApproved	COUNT	AvgMissing	AdjRiskScore
Facility 1	1	1.00	1	1.00	1	0.00	0	21.00	0.60	17.00
Facility 2	0	0.00	0	1.00	1	0.00	0	19.00	0.59	16.18
Facility 3	0	1.00	1	0.00	0	0.00	0	20.00	0.52	14.52
Facility 4	0	0.00	0	1.00	1	0.00	0	20.00	0.44	12.44
Facility 5	0	0.00	0	1.00	1	0.00	0	21.00	0.42	12.00
Facility 6	0	0.00	0	1.00	1	0.00	0	21.00	0.37	10.50
Facility 7	0	0.00	0	1.00	1	0.00	0	20.00	0.35	9.85
Facility 8	0	0.00	0	0.00	0	0.00	0	19.00	0.35	9.71
Facility 9	0	0.00	0	1.00	1	0.00	0	19.00	0.35	9.71
Facility 10	0	0.00	0	1.00	1	0.00	0	18.00	0.35	9.56
Facility 11	0	0.00	0	0.00	0	0.00	0	21.00	0.33	9.50
Facility 12	0	0.00	0	0.00	0	0.00	0	17.00	0.36	9.42
Facility 13	1	0.00	0	1.00	1	0.00	0	17.00	0.36	9.42
Facility 14	0	0.00	0	1.00	1	0.00	0	17.00	0.33	8.83
Facility 15	0	0.00	0	1.00	1	0.00	0	17.00	0.33	8.83
Facility 16	0	0.00	0	1.00	1	0.00	0	16.00	0.33	8.67
Facility 17	0	0.00	0	1.00	1	0.00	0	20.00	0.30	8.30
Facility 18	0	0.00	0	0.00	0	0.00	0	20.00	0.28	7.78
Facility 19	0	0.00	0	0.00	0	0.00	0	20.00	0.28	7.78
Facility 20	0	0.00	0	1.00	1	0.00	0	20.00	0.28	7.78
Facility 21	0	0.00	0	1.00	1	0.00	0	19.00	0.27	7.55
Facility 22	0	0.00	0	0.00	0	0.00	0	20.00	0.26	7.26
Facility 23	0	0.00	0	1.00	1	0.00	0	12.00	0.30	7.20
Facility 24	0	0.00	0	0.00	0	0.00	0	21.00	0.25	7.00
Facility 25	0	0.00	0	0.00	0	0.00	0	20.00	0.24	6.74
Facility 26	0	0.00	0	0.00	0	0.00	0	15.00	0.26	6.54
Facility 27	0	0.00	0	0.00	0	0.00	0	19.00	0.20	5.39
Facility 28	0	0.00	0	1.00	1	0.00	0	15.00	0.21	5.23
Facility 29	0	0.00	0	1.00	1	0.00	0	13.00	0.21	5.20
Facility 30	0	0.00	0	0.00	0	0.00	0	21.00	0.18	5.00
Facility 31	0	0.00	0	1.00	1	0.00	0	14.00	0.19	4.86
Facility 32	0	0.00	0	0.00	0	0.00	0	19.00	0.16	4.31
Facility 33	0	0.00	0	1.00	1	0.00	0	15.00	0.13	3.27
Facility 34	0	0.00	0	1.00	1	0.00	0	15.00	0.13	3.27
Facility 35	0	0.00	0	0.00	0	0.00	0	21.00	0.11	3.00
Facility 36	0	0.00	0	0.00	0	1.00	1	12.00	0.10	2.40