

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

LATONYA THORNHILL,)

Plaintiff,)

v.)

WALDEN UNIVERSITY, LLC and)

LAUREATE INTERNATIONAL UNIVERSITIES)

D/B/A LAUREATE EDUCATON INC.)

Defendant.)

_____)

Case No.: _____

Judge: _____

JURY TRIAL DEMANDED

CLASS ACTION COMPLAINT FOR DAMAGES

Plaintiff LaTonya Thornhill (“Plaintiff”), by and through her undersigned counsel, brings this Class Action Complaint (“Complaint”) on behalf of herself and all others similarly situated against Defendant Walden University, LLC (“Walden”) and Laureate International Universities d/b/a Laureate Education Inc. (“Laureate”).

1. This action seeks redress for Plaintiff and thousands of similarly situated doctoral students who were harmed by Walden’s dissertation process (“the Walden Dissertation Process”)—a process intended to ensure that it would be difficult, if not impossible, for students to timely complete, or complete at all, their doctoral programs.

2. The bait was displayed when Walden’s marketing materials and recruiters misled its students that their mostly student-loan financed doctoral degrees would cost between \$60,000-70,000 and take around three years to complete. Walden’s marketing materials, recruiters and student handbooks also reassured prospective students that after their doctoral course work was

completed, the dissertation process (the final hurdle to achieving a PhD) could take as little as 13 or 18 months.

3. The bait was taken when Walden doctoral students would complete their classes and course work prior to the dissertation phase. Once the doctoral students were committed, having paid significant money for the necessary pre-dissertation classes and course work, problems began. Instead of the promised 13 or 18-month dissertation period, the Walden Dissertation Process created an endless routine of hurdles and quarterly tuition payments. Students who believed they were getting ever closer to obtaining their doctoral degree were in fact stuck with decreasing resources, high faculty turnover, disorganization and a lack of oversight, all of which increased the length of the doctoral students' enrollments at Walden. Frustrated, doctoral students now realized that contrary to Walden's promises, they did not have control over the time it would take to complete their dissertation; They were at the mercy of the Walden Dissertation Process.

4. While students reasonably believed they were taking the necessary steps to obtain their PhD, quarters stretched into semesters, and then into years of continuing tuition payments. Walden's promises of about \$60,000-70,000 and 13 or 18 months to complete a dissertation became \$100,000-200,000 of crushing debt, while the dissertation process dragged on for years.

5. Finally, most students' debt would grow so large, they would have no choice but to un-enroll so they could dedicate themselves full time to paying back their enormous student loans...without degrees to show for their work.

6. In reality, Walden (actually, its parent company Laureate) would later admit that its doctoral programs were designed to take much longer than three years. For example, years after Plaintiff Thornhill enrolled in the Doctor of Philosophy in Management program, Laureate

admitted Walden designed that program “to take 66 months to complete.” Not three years, but five years, six months. Yet, even this 66-month design admission was dubious, as Laureate/Walden simultaneously admitted that only 33% of doctoral students who graduated, finished the program within that 66-month time frame. These facts, inconsistent as they may seem, were withheld from Plaintiff Thornhill prior to her enrollment at Walden, or while she attended for that matter. Instead, she received promises of a three-year program, with an 18-month dissertation process.

7. The Walden Dissertation Process ensnared thousands of students in addition to Plaintiff Thornhill. For 2014-2015, Walden only awarded 462 PhDs in the winter of 2014, 545 PhDs in the summer of 2014, 558 PhDs in the winter of 2015 and 457 PhDs in the summer of 2015.¹ Upon information and belief, at any time over 12,500 doctoral students are enrolled in Walden; however, in any year, less than 10% of that doctoral population would graduate.²

8. Universities exist to educate and grant degrees. With a, upon information and belief, less than 10% completion rate for the doctoral population, Walden does not act like a university (for-profit or otherwise). Rather, Walden acts like a for-profit corporation.

¹ This data was collected from Walden commencement programs available online at: http://www.mywaldenalumni.com/s/1277/images/editor_documents/2014_events/laur337_nr-commencement_program_book_winter_2014_final_2.pdf, http://www.mywaldenalumni.com/s/1277/images/editor_documents/2014/laur6485_nr-commencement_program_book_summer_2014_web.pdf, http://www.mywaldenalumni.com/s/1277/images/editor_documents/commencement_s12/2015/commencement_program_winter_2015_final.pdf and http://www.mywaldenalumni.com/s/1277/images/editor_documents/s15_commencement_program.pdf.

² The 10% was conservatively calculated from the following information. In 2013, Walden allegedly had 51,016 students. Data available from: <https://nces.ed.gov/fastfacts/display.asp?id=74>. In 2016, Walden allegedly had 52,600 students. Data from <https://www.waldenu.edu/about/who-we-are/students>. Given Walden had 51,016 and 52,600 students for the years flanking 2014 and 2015, it is safe to conservatively estimate Walden had over 50,000 total students in 2014 and 2015. As described in Paragraph 35 below, about 25% of the student population is believed to be doctoral students. Therefore, it's a safe assumption that at least 12,500 students were enrolled in doctoral programs at Walden during 2014 and during 2015. In 2014, 1007 doctoral students graduated. In 2015, 1015 doctoral students graduated. Therefore, for both years only 8.1% of the total population of doctoral students in 2014 and 2015 (respectively) received PhDs.

9. As a for-profit corporation, Walden, and its parent Laureate, created this process to receive ever-increasing amounts of money in the form of tuition payments and fees. The longer a student pursued a degree, the more tuition payments and fees that student would pay. Further, having already paid tens of thousands of dollars to get “half way” through the program (*i.e.*, completing the classroom work prior to starting the dissertation process), most students would understandably be compelled to continue pursuing their degree despite Walden’s hurdles, feeling they have what it takes if they just keep working.

10. It was nearly a perfect plan. Given that the Walden doctoral program was mostly online, students were isolated from the vast majority of their peers, unable to see whether others faced the same challenges. Instead, the students would assume it was just them, and continue a fight they could not win.

11. The Walden Dissertation Process, as detailed herein, was intended to (and did) generate substantial additional revenue for Walden and Laureate by way of additional tuition and fees. The practice resulted in the members of the Class (defined below) paying substantially more for Walden’s doctoral educational services than promised (or reasonably anticipated by the students).

12. The Walden Dissertation Process caused substantial damage to Plaintiff and the Class. If Walden had not misrepresented the number of students that actually completed the PhD program (upon information and belief, less than 10% of the doctoral population), *no one* would have attended Walden or made any tuition and fee payments.

13. Further, had Walden not misrepresented the timelines, costs and realities of its dissertation process, Plaintiff and the other members of the Class would not have paid for the educational services offered by Walden.

14. Instead, they relied upon Walden's misrepresentations and omissions, and are now saddled with crippling debt...and no PhD.

THE PARTIES

15. Plaintiff Thornhill is, and has been at all relevant times, a resident and citizen of the State of Ohio, who attended Walden as a doctoral student from 2011 to 2015.

16. Walden is a limited liability company organized under the laws of the State of Florida with its principal place of business in Baltimore, Maryland. Upon information and belief, Walden is a wholly-owned subsidiary of Laureate Education, Inc.

17. Upon information and belief, Laureate Education, Inc. ("Laureate") is a corporation organized under the laws of the State of Delaware with its principal place of business in Baltimore, Maryland. Laureate is a parent of Walden.

JURISDICTION AND VENUE

18. This Court has subject matter jurisdiction pursuant to 28 U.S.C. § 1332(d)(2) because the matter in controversy, upon information and belief, exceeds \$5,000,000, exclusive of interest and costs, and this is a class action in which certain members of the Class and Defendant are citizens of different states.

19. This Court has personal jurisdiction over Walden because it conducts significant business in Ohio, including interacting directly with Plaintiff Thornhill for years in Ohio, as well as other members of the class that reside in Ohio.

20. This Court has personal jurisdiction over Laureate because it conducts significant business in Ohio, including receive profits from tuition paid by Plaintiff and other members of the Class that reside in Ohio.

21. Venue is proper in the United States District Court for the Southern District of Ohio, pursuant to 28 U.S.C. § 1391, because Walden engaged and engages in substantial business throughout this district, and many of the acts complained of herein took place within this district.

WALDEN, ITS GROWTH AND ITS FUNDING

22. Walden is a for-profit, online university that offers bachelor's, master's and doctorate level degrees to students.

23. Founded in 1970, Walden originated as an institution that allowed working adults to obtain graduate level degrees in school administration. Walden currently offers bachelor's, master's and doctoral degrees to online students.

24. Walden offers a number of online, doctorate level degrees: Doctor of Business Administration, PhD in Management, PhD in Counselor Education and Supervision, PhD in Criminal Justice, Doctor of Education (EdD), PhD in Education, Education Specialist (EdS), Doctor of Nursing Practice (DNP), PhD in Nursing, Doctor of Public Health (DrPH), PhD in Public Health, Doctor of Healthcare Administration (DHA), PhD in Health Education and Promotion, PhD in Health Services, Doctor of Information Technology, PhD in Public Policy and Administration, PhD in Psychology, PhD in Industrial and Organizational Psychology, PhD in Human and Social Services, Doctor of Social Work and PhD in Social Work.

25. Given the number of degrees offered, and as will be illustrated in ¶29 below, the large sums spent on marketing, enrollment at Walden has increased significantly over the last 15 years. In 2001, Walden had an enrollment of 2,082 students. Through the next nine years, enrollment increased over 2000%.

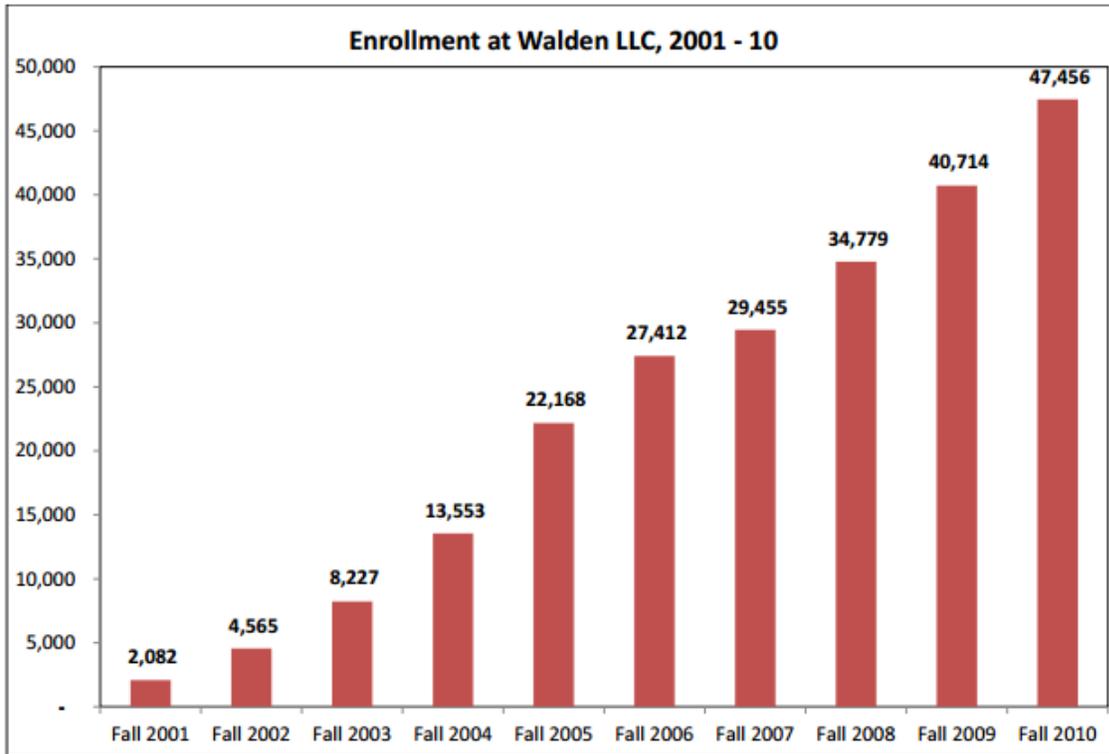


Exhibit A, 2010 Senate For Profit Report, section on Walden at p. 707, available at:

http://www.help.senate.gov/imo/media/for_profit_report/PartII/Walden.pdf

26. In 2016, Walden's enrollment grew to allegedly 52,600 students.³

27. Not surprisingly, the increased enrollment has led to a similar trajectory for Walden's revenue. In 2006, Walden had revenue of approximately \$190,700,000. In 2009, Walden's revenue had nearly doubled to approximately \$377,000,000. With allegedly 52,600 current students, Walden's 2016 revenue likely will exceed \$400,000,000.

28. The vast majority of Walden's revenue is derived from federally funded student loans. In 2010, 78.8% (\$348,000,000) of Walden's revenue was derived from federal funds.

29. As a for-profit college, Walden devotes substantial portions of revenue to both marketing and profit. As of 2009, Walden spent approximately 26.8% of its revenue (\$101,000,000) on

³ Data from <https://www.waldenu.edu/about/who-we-are/students>.

marketing and recruitment of new students. Likewise, in 2009, Walden allocated approximately 26.8% of its revenue (\$101,000,000) to profit. The amount that Walden spends on marketing and recruitment, as well as amounts allocated to profit, is higher than average for other for-profit colleges.

30. In just three years between 2006 and 2009, the profit generated by Walden increased from \$33,000,000 to \$101,000,000.

31. In 2009, Walden spent only \$1,574 per student on instruction compared to \$2,230 per student on marketing. Even more striking, Walden realized \$1,915 in profits per student. By way of comparison, the University of Minnesota spent \$13,247 per student on instruction during the same time period.

32. Walden students carry some of the highest student loan debts in the country. A 2015 Brookings Institution study found that by 2014, students had accumulated \$6.1 billion in debt while at Walden. This was the fifth largest amount of debt out of the more than 3,000 schools in the report.

33. Further, a 2015 study by the Center for American Progress found that Walden students received the most federal graduate loans in the 2013-2014 academic year, with over \$756 million.

34. Walden doctoral students (like all students) are required to pay back their student loan debt regardless as to whether they receive the degree they sought or not.

35. According to the Senate's 2012 investigation of For Profit Colleges, in the 2008-2009 timeframe, 5,325 doctoral students enrolled at Walden.⁴

⁴ Although unclear from the 2012 Senate Report, it appears this information corresponds to students who enrolled in 2008 and 2009; it was not the entire student population. Therefore, 5,325 doctoral students were added during that time frame. If, however, 5,325 students was the total doctoral student population for 2008 and 2009, then the 0.6% "percent completed" statistic is appalling.

| Status of Students Enrolled in Walden E-Learning LLC in 2008-9, as of 2010 | | | | | | |
|--|------------|-------------------|------------------------|-------------------|------------------|-------------|
| Degree Level | Enrollment | Percent Completed | Percent Still Enrolled | Percent Withdrawn | Number Withdrawn | Median Days |
| Bachelor's Degree | 3,230 | 1.4% | 47.3% | 51.4% | 1,659 | 91 |
| Masters | 11,770 | 14.4% | 57.5% | 28.1% | 3,309 | 173 |
| Doctoral | 5,325 | .6% | 59.8% | 39.6% | 2,108 | 174 |
| All Students | 20,325 | 8.7% | 56.5% | 34.8% | 7,076 | 154 |

Exhibit A, Senate Report on For-Profit Universities, Walden at 714. From this data, it appears 25% of Walden's student population are doctoral students. With an enrollment of 52,600 in 2016, if the 25% doctoral student statistic still holds true, it would mean that approximately 13,150 of those students are doctoral students.

36. Since, upon information and belief, less than 10% of Walden's doctoral student population receives a PhD each year, an exceeding large number do not receive a degree, despite paying large sums for tuition.

LAUREATE

37. Laureate is not simply the parent company of Walden, upon information and belief, it also exerts an undue amount of control over Walden's activities.

38. This can be seen from a website owned and operated by Laureate which displays information about the inner workings of Walden. Such data is made available allegedly for prospective Walden students considering whether or not to attend Walden. This website, however, is under a Laureate domain (*e.g.*, <http://programdata.laureate.net/walden/>), not a www.walden.com domain. Importantly, this Laureate website describes how the Walden Dissertation Process was created and implemented, and how it ensnared Walden students.

WALDEN'S NEVER-ENDING PHD PROGRAM

39. Through recruiting and marketing, Walden promises that obtaining a PhD from Walden is not only feasible, it is inexpensive and relatively quick.

40. Upon information and belief, prior to 2012, Walden did not publicly provide meaningful data regarding graduation rates of its various doctoral programs. It appears that only after a Senate investigation into For Profit Schools (of which Walden was one of many such schools targeted), it began providing such information in 2012.

Walden Designed its PhD in Management Program to Take Five Years, Six Months, but Represented a Much Shorter “On-Time Completion Rate” and “Normal Completion Time”

41. Focusing on the Doctor of Management (Plaintiff Thornhill’s chosen area), the first available webpage about Walden graduation rates, time frames and potential costs is from March 2012. Exhibit B, PhD in Management, Program Data, from March 10, 2012. While not providing much data regarding graduation rates, Walden did state it had an “on-time completion rate” for this program of 68.5%, with average tuition costs of \$73,795-106,555 and average books and supplies costs of \$3,249-3,393.

Program Completion—The program completion rate is the percentage of students who graduated between July 1, 2009, and June 30, 2010, who completed this program in the normal completion time.

The program completion time may vary depending on transfer of credit and the pace at which a student chooses to complete the program. Because many of the students in this program are working adults and need to balance personal and professional commitments, our academic advisors can help establish an appropriate program of study that enables each student to complete this program in a time frame that works best for him or her.

| Rate | Percentage |
|-------------------------|------------|
| On-time completion rate | 68.5% |

Program Costs—The total program costs are the estimated average costs over the duration of the program, excluding any scholarship or tuition reductions, for students completing the program on time. These costs can vary based on the number of credits. Typically, tuition and fees are subject to change annually.

| Expense | Cost |
|--------------------|----------------------|
| Tuition and Fees | \$73,795 - \$106,555 |
| Books and Supplies | \$3,249- \$3,393 |
| Room and Board | Not applicable |

Id.

42. The 68.5% completion rate was represented as arising from the following metric:

Program Completion—The program completion rate is the percentage of students who graduated between July 1, 2009, and June 30, 2010, who completed this program in the normal completion time.

Id.

43. Upon information and belief, the 68.5% “On-time completion rate” that Walden provided on this page was false.⁵

44. Upon information and belief, Walden provided the 68.5% “On-time completion rate” to mislead students into enrolling into its Doctor of Management program.⁶

45. For this webpage, Walden did not define “normal completion time.” However, the next sentence on the page represented that “program completion time may vary” depending on various factors. One of the two specific variables identified by Walden was the “... pace at which **a student chooses** to complete the program.” *Id.* (emphasis added). To further reinforce the illusion that its students would have control over the length of time the program took them to complete, Walden also represented that the student can “complete this program in a time frame that works best for him or her.”

46. Upon information and belief, the statements that doctoral students can choose a) the pace at which they can complete the PhD in Management program and/or b) the time frame that works best for them to complete their degree were false.

⁵ This identical phrase appears on many, if not all, of the contemporaneous Program Data webpages for the doctoral programs offered by Walden, and is believed to be false on all such pages.

⁶ As this identical phrase appears on many, if not all, of the contemporaneous Program Data webpages for other doctoral programs offered by Walden, it is believed Walden provided it to mislead prospective students into enrolling in their various doctoral programs.

47. Upon information and belief, Walden provided the “... pace at which a student chooses to complete the program” and “complete this program in a time frame that works best for him or her” statements to mislead students to enrolling in its PhD in management program.⁷

48. A year later, on or about June 12, 2013, Walden updated this webpage to show its still undefined “On-time completion rate” had sharply dropped to 49.3% with average tuition costs of \$64,860-111,500 and average books and supplies costs of \$3,604-4,558.

Program Completion—The program completion rate is the percentage of students who graduated between July 1, 2011, and June 30, 2012, who completed this program in the normal completion time.

The program completion time may vary depending on transfer of credit and the pace at which a student chooses to complete the program. Because many of the students in this program are working adults and need to balance personal and professional commitments, our academic advisors can help establish an appropriate program of study that enables each student to complete this program in a time frame that works best for him or her.

| Rate | Percentage |
|-------------------------|------------|
| On-time completion rate | 49.3% |

Note: Completion rates reflect graduates from the Knowledge Area Module instructional model which is no longer offered in this program.

Program Costs—The total program costs are the estimated average costs over the duration of the program, excluding any scholarship or tuition reductions, for students completing the program on time. These costs can vary based on the number of credits. Typically, tuition and fees are subject to change annually.

| Expense | Cost |
|--------------------|------------------|
| Tuition and Fees | \$64,860-111,500 |
| Books and Supplies | \$3,604-4,558 |
| Room and Board | Not applicable |

Ex. C, June 12, 2013, PhD in Management, Program Data, from June 12, 2013.

49. The timeframe of the metric used to calculate the 49.3% also changed:

⁷ As these identical phrases appear on many, if not all, of the contemporaneous Program Data webpages for other doctoral programs offered by Walden, it is believed Walden provided them to mislead prospective students into enrolling in their various doctoral programs.

Program Completion—The program completion rate is the percentage of students who graduated between July 1, 2011, and June 30, 2012, who completed this program in the normal completion time.

Id.

50. Upon information and belief, the 49.3% “On-time completion rate” that Walden provided on this page was false.

51. Upon information and belief, Walden provided the 49.3% “On-time completion rate” to mislead students into enrolling into its Doctor of Management program.

52. Again, Walden also represented that the students could exercise control over how long the program took to finish.

53. In 2014, the webpage format for this page changed, as did its location. Ex. D, PhD in Management, Program Data, from March 7, 2014. Instead of being found on a Walden website, it was now moved to Laureate’s website.⁸

54. The Laureate website also provided additional information about the Walden PhD in Management. This new information showed the prior representations made by Walden in the previous two versions of this webpage were false.

55. For the first time, Walden/Laureate admitted the PhD in Management program was actually “designed to take 66 months,” and not the 3 years that had been previously represented.

⁸ Although hyperlinked through Walden’s website, the actual link to which this data resided (as well as for all of Walden’s doctoral programs) can be found only on a Laureate webpage at: <http://programdata.laureate.net/walden/phd-in-management.html> (emphasis added).

PhD in Management
 Program Level - Doctoral degree
 Program Length - 66 months

Cost How much will this program cost me?*

A. Tuition and fees: \$66,260
 Books and supplies: \$3,820
 On-campus room & board: *not offered*

What other costs are there for this program?

For further program cost information [click here.](#)

*The amounts shown above include costs for the entire program, assuming normal time to completion. Note that this information is subject to change.

SUCCESS How long will it take me to complete this program?

A. The program is designed to take 66 months to complete. Of those that completed the program in 2012-2013, 33% finished in 66 months.

What are my chances of getting a job when I graduate?

A. The job placement rate for students who completed this program in 2012-2013 is *%.

* This institution is not currently required to calculate a job placement rate for program completers.

Id. Despite the program being designed to allegedly take “66 months,” Walden still used its prior undefined “normal time to completion” timeframe (whatever that was) when it calculated the “Tuition and fees” and “Books and supplies” “for the entire program” – representing that a student that took “the normal time to completion” (*i.e.*, apparently 66 months) would pay \$66,260 and \$3,820, respectively. *Id.*

56. As it turns out, a PhD in Management program “designed to take 66 months” would cost far more than \$66,260 and \$3,820 based on representations by Walden on a separate webpage about its “Tuition and fees.”

57. In other words, at the time this Laureate webpage was offered,⁹ Walden also had a “Tuition and Fees” explanation on its own webpage. Ex. E, PhD in Management, Tuition and Fees (Feb. 9, 2014). The “Tuition and Fees” tab on Walden’s webpage explained that it would cost \$4,835 per quarter for tuition plus \$1,160 for residency fees (four required¹⁰), along with a technology fee of \$120 per quarter to complete the PhD in Management program.

⁹ The Ex. D Laureate page is dated from March 7, 2014. The Ex. E, Walden “Tuition and Fees” page is dated from Feb. 9. Upon information and belief, both pages were available from the internet at the same time.

¹⁰ The residency fee did not cover travel, lodging and other expenses associated with the residencies. Those additional costs had to be separately covered by the student.

| CURRICULUM | TUITION AND FEES | HIGHLIGHTS | LEARNING OUTCOMES | PROGRAM DATA |
|-------------------------------|--|------------|-------------------|---|
| Curriculum Component | Requirements | | | Cost |
| Self-Directed Specializations | 98-102 total quarter credit hours | | | \$4,835 per quarter |
| Course-Based Specializations | 96 total quarter credit hours | | | \$645 per quarter credit hour |
| 4-Day Residency Fee | 4 during your program (Residency 2 and Residency 4 may be virtual) | | | \$1,160 each, plus travel, lodging, other expenses Virtual: \$1,260 each |
| Technology Fee | per quarter | | | \$120 |

Tuition and fees are subject to change.

Call 1-866-492-5336 for information about a full range of options for:

- [Federal Financial Aid](#)
- [Transfer of Credit](#)

Id. Relying on this Feb. 9, 2014 Walden data, the Plaintiff's PhD in Management could allegedly be obtained in roughly three years (12 quarters) for approximately \$64,100 in tuition and fees.¹¹

58. While this estimated \$64,100 in tuition and fees is consistent with Laureate's estimate of \$66,260 in tuition and fees,¹² it is inconsistent with the admitted 66-month design of the program. Using 66 months as a base (22 quarters), the tuition and fees to complete the program should be represented to be \$113,650.¹³ The "design" of the program then results in twice the disclosed tuition and fees for the student, yet Walden and Laureate still misrepresented the cost to student to complete the program as being less than half the properly-calculated amount.

¹¹ \$64,100 = (\$4,835 quarterly tuition * 12 quarters) + (4 * \$1,160 for four required residency fees) + (\$120 per quarter technology fee * 12).

¹² In other words, Walden's 2014 program data on Laureate's website for a 22-month program would somehow be only \$2,160 more than what a three-year program was represented on Walden's webpage to cost.

¹³ \$113,650 = (\$4,835 quarterly tuition * 22 quarters) + (4 * \$1,160 for four required residency fees) + (\$120 per quarter technology fee * 22).

59. Worse, only 33% of students that graduated with a PhD in Management completed the 66-month designed program within that time frame. Ex. E. The remaining 67% of graduates took longer. *Id.*

Walden and Laureate's September 2016 Webpages Still Contain False Statements

60. After a flurry of lawsuits from graduate students (mostly forced to represent themselves), Walden changed its webpage "Tuition and Fees" graphic to add warnings that:

The tuition reflects the **minimum time to completion**. Time to completion varies by student, depending on individual progress and credits transferred, if applicable.¹⁴

Ex. F, PhD in Management, Tuition and Fees (Oct. 28, 2014)(emphasis added). The same warning appeared on Walden's "Tuition and Fees" webpage until about September 27, 2016. Ex. G, PhD in Management, Tuition and Fees (Sept. 27, 2016).

¹⁴ The first instance of this webpage being available on archive.org is October 28, 2014. Therefore, upon information and belief, this language was added on or about October 28, 2014.

| Curriculum Component | Requirements | Cost | Total* |
|------------------------------|---|--|-----------------|
| Course-Based Specializations | 86 total quarter credit hours | \$705 per quarter credit hour | \$60,630 |
| 4-Day Residency Fee | Four residencies (Residency 2 may be virtual, Residency 4 may be virtual or a capstone intensive retreat) | \$1,320 (travel, lodging, and other expenses are additional) Virtual: \$1,420 | \$5,280 |
| Technology Fee | Per quarter | \$125 | \$1,500 |
| | | Total | \$67,410 |
| | | <i>Transfer up to 43 credits</i> | <i>\$31,065</i> |
| | | Total With Maximum Transfer Credits[†] | \$36,345 |

The tuition reflects the minimum time to completion. Time to completion varies by student, depending on individual progress and credits transferred, if applicable. For a personalized estimate of your time to completion, call an enrollment advisor at 1-866-492-5336.

*Tuition and fees are subject to change. Books and materials are not included and may cost up to an additional \$1,400 and \$1,600.

[†]Maximum transfer credit total includes reduction in technology fee as related to reduced number of courses over time.

61. The 2014-2016 webpages also recited the “minimum” time to completion would be \$67,410.

62. These representations show the duplicity of Walden. While the program allegedly was “designed to take 66 months,” meaning it would cost over a hundred thousand dollars to complete, Walden represented that the “minimum time to completion” (corresponding to three years) could be as little as about \$67,000.

63. It’s not unreasonable to assume that if Walden designed the course to take 66 months, then 66 months should be the “minimum time to completion.” Walden, however, utilized a false and misleading tuition and fees calculation based on three years for the “minimum time to

completion” calculation. Walden provided this false information to mislead prospective students into enrolling in its PhD in Management program.¹⁵

64. Further, this Laureate webpage admits that only 33% of students in 2012-2013 actually completed the program within the “normal” 66-month timeframe. The “normal time to completion” then cannot be as low as 66 months then, it must be something longer.¹⁶

65. Despite these fraudulent misrepresentations, this Laureate webpage remained available from 2014 through early 2016. When Walden/Laureate finally updated the webpage in mid-to-late 2016, its misrepresentations became even more pronounced.

¹⁵ As these identical phrases appear on many, if not all, of the contemporaneous Program Data webpages for other doctoral programs offered by Walden, it is believed Walden provided them to mislead prospective students into enrolling in their various doctoral programs.

¹⁶ It is not unreasonable to assume a “normal” time to completion would require 50% or more of the student population to complete the program in that time frame. Anything number less (like 33%) would not be normal.

Walden University

PhD in Management

Program Level - Doctoral degree
Program Length - 58 months



COST

Q. How much will this program cost me?*

A. Tuition and fees: \$82,410
Books and supplies: \$4,171
On-campus room & board: *not offered*

What other costs are there for this program?

For further program cost information [click here](#).

* The amounts shown above include costs for the entire program, assuming normal time to completion. Note that this information is subject to change.

FINANCING

Q. What financing options are available to help me pay for this program?

A. Financing for this program may be available through grants, scholarships, loans (federal and private) and institutional financing plans. The median amount of debt for program graduates is shown below:

Federal loans: \$97,090
Private education loans: \$0
Institutional financing plan: \$0

SUCCESS

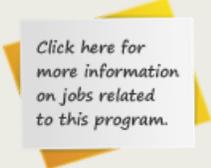
Q. How long will it take me to complete this program?

A. The program is designed to take 58 months to complete. Of those that completed the program in 2014-2015, 24% finished in 58 months.

Q. What are my chances of getting a job when I graduate?

A. The job placement rate for students who completed this program is %.

* This institution is not currently required to calculate a job placement rate for program completers.



Ex. H, PhD in Management, Program Data (current). While the PhD in Management program from 2014 through early 2016 was allegedly “designed to take 66 months,” inexplicably, the mid-to-late 2016 program was shortened so that it now allegedly was “designed to take 58 months to complete.” *Id.* This despite the most recent webpage reflecting an even lower rate of students (only 24%) actually completing the 58-month program. Moreover, despite an eight-month reduction in “designed” completion time, the represented tuition and fees increased from \$60,630 to \$82,410—a 35% increase. Further, the \$82,410 was still calculated from a false “normal time to completion” of, again, three years. Had the “normal time to completion” been calculated from the “designed” 58-month time, it would have exceeded \$100,000. Even further,

the “normal completion time” could not be 58 months, as only 24% of graduating students completed the program in that time frame...meaning a “normal completion time” (*i.e.*, when half or more of the students would complete the program) would exceed 58 months.

66. The statements on this page are obviously false, with intent to mislead prospective students to enroll in Walden’s PhD in Management program.¹⁷

67. What should not be lost is that the “normal time to completion” is calculated from students that graduated. The vast majority of Walden doctoral students do not graduate, yet still paid for tuition fees and costs, and are still burdened by student loan debt.

Walden’s “Normal Time to Completion” and Course Design Fraud Cover All its Doctoral Programs.

68. Walden and Laureate’s manipulation of tuition rates and times to completion were not confined to just the Plaintiff’s PhD in Management program. Despite blanket statements of estimates based on “minimum time to completion” and “normal completion time” across Walden’s PhD programs, the vast majority were “designed” to take longer.

69. The Laureate webpage for the PhD in Psychology program (upon information and belief believed to be available from 2014 until early 2016) stated the Psychology program was “designed to take 72 months to complete,” although only 44% of the 2013-2014 graduates completed the program within that time frame. Ex. I, Laureate PhD in Psychology webpage (March 6, 2015). Assuming the “designed” 72 months was the “normal time to completion,” (despite only 44% of students who graduated meeting this time frame), the estimated tuition and fees would have exceeded \$100,000 (as opposed to the \$67,610 represented by Walden). *Id.*

¹⁷ Again, false statements such as these appeared on webpages concerning all of Walden’s doctoral programs. Therefore, Walden intended prospective students to rely upon all them to enroll in Walden’s doctoral programs.

Further, with only 44% of students meeting the “designed” time, a “normal time to completion” must be longer than 72 months.

70. In mid-to-late 2016, the Laureate webpage for the PhD in Psychology program was updated to recite the Psychology program now was allegedly “designed to take 66 months to complete.” Ex. J, Laureate PhD in Psychology webpage (Sept. 28, 2016). This alleged six-month shortening of the program, however, was only met by 21% of the 2014-2015 students who graduated. Walden then manipulated this shorter 66-month time frame by selecting a much lower completion rate of 21% (from the 44% of 2013-2014). *Id.* Further, with only 21% of students meeting the “designed” time, a “normal time to completion” must be longer than 66 months.

71. The Laureate webpage for the PhD in Health Services program (upon information and belief available from 2014 until early 2016) stated it was “designed to take 66 months to complete,” although only 27% of the 2012-2013 graduates completed the program within that time. Ex. K, Laureate PhD in Health Services webpage (from Feb. 21, 2015). Despite reciting “66 months” until completion, the “Tuition and fees” cited for this program was \$59,285 “assuming normal time to completion.” *Id.* However, if 66 months was used as a “normal time to completion” (despite only 27% of students who graduated meeting this time frame), the estimated tuition and fees should have exceeded \$100,000. Further, with only 27% of students meeting the “designed” time, a “normal time to completion” must be longer than 66 months.

72. The Laureate webpage for the PhD in Public Policy and Administration program (upon information and belief available from 2014 until early 2016) stated it was “designed to take 66 months to complete” and, allegedly, 100% of its 2012-2013 graduates completed it within that time frame. Ex. L, Laureate PhD in Public Policy and Administration webpage (March 6, 2015). Despite this boast, it still indicated that students’ “Tuition and fees” and “Books and supplies”

would cost only \$48,650 and \$3,933 respectively. *Id.* However, if 66 months was used as a “normal time to completion,” the estimated tuition and fees should have exceeded \$100,000.

73. Bizarrely, in mid-to-late 2016, the Laureate webpage for a PhD in Public Policy Administration was updated to state the program was now “designed to take 55 months to complete” (allegedly shortening the program by 11 months), yet the number of students that completed it on time drastically dropped to 28%. Ex. M, Laureate PhD in Public Policy and Administration webpage (Sept. 28, 2016). Bafflingly, despite shortening the program by 11 months, the costs of “Tuition and fees” and “Books and supplies” increased to \$67,241 and \$4,367. *Id.* However, if 55 months was used as a “normal time to completion,” the estimated tuition and fees should have likely exceeded \$100,000. Further, with only 28% of students meeting the “designed” time, a “normal time to completion” must be longer than 55 months.

74. The Laureate webpage for the Doctor of Business Administration (upon information and belief available from 2014 until early 2016), stated the program was “designed to take 42 months.” Ex. N, Laureate Doctor of Business Administration webpage (April 28, 2015). In mid-to-late 2016, Walden updated this page to state the program was “designed to take 50 months to complete” (lengthening the program by eight months). Ex. O, Laureate Doctor of Business Administration webpage (Sept. 28, 2016). Upon information and belief, all cost estimates for this program, however, were based on a three-year program timeline.

75. The same Laureate webpage for the PhD in Public Health program (upon information and belief available from 2014 until early 2016) stated it was “designed to take 66 months to complete,” although of those that completed the program in 2012-2013, only 37% completed it within that time frame. Ex. P, Laureate PhD in Public Health webpage (Feb. 21, 2015). This was a drastic drop for a program that allegedly in March 6, 2012, reported an alleged 88.9%

completion rate from the still nebulous “normal completion time” metric. Further, with only 37% of students meeting the “designed” time, a “normal time to completion” must be longer than 66 months. Also, Walden stated that the “Tuition and fees” and “Books and supplies” for this program would cost \$49,200 and \$3,528, respectively. Obviously, if a 66-month designed time to completion were utilized, the fees would far exceed \$49,200.

76. Still, in mid-to-late 2016, the Laureate webpage for the PhD in Public Health was updated to report that the program was “designed to take 63 months to complete” (an alleged three month shortening of the program), although now only 30% of students that graduated in 2014-2015 completed the program in that time frame. Ex. Q, Laureate PhD in Public Health webpage (Oct. 2, 2016). Further, regardless as to whether a 66 or 63-month time frame was utilized, the “Tuition and fees” would not be \$70,563; rather, they would exceed \$100,000. Finally, with only 30% of students meeting the “designed” time, a “normal time to completion” must be longer than 63 months.

**PROMISES BY WALDEN AND ITS RECRUITERS WERE WELL BELOW THE
“DESIGN” OF EACH PROGRAM**

77. Despite the actual “design” of each doctoral program, Walden repeatedly touted that after doctoral coursework was completed, it would only take 13 or 18 months to receive a degree.

78. Upon information and belief, recruiters commonly explained to potential students that after the completion of doctoral classwork, it would take only 18 months to complete one’s dissertation. Such representations were made specifically to Plaintiff Thornhill in this action by a recruiter about one month prior to her enrolling in the PhD in Management program.

79. Representations of a relatively quick timeline were not made to just the Plaintiff. There are numerous complaints online about this practice, and how misleading Walden’s estimates were. For example, one woman recounts how she and five other educators from Coffee County,

Georgia were promised that the doctoral program would take only three years. Despite that, only one of those educators was able to receive her doctorate in the time promised.

Vette S. said
364 days ago

Thank goodness someone has staeted this process. I am from Coffee County, GA. In 2004 or 2005 A Walden representative met with a large group of teachers and made the following statements. The program would be a 3 year Doctorial program costing of approximately \$ 25,000. The Universitywould "hold your hand" through the program as your dissertation would be composed through research articles used in your coursework. After completing my coursework with a 4.0, I began the dissertation process. After writing chapters 1-2 and having it reviewed by my chair I went through the process of revions paying more out of pocket for additional semesters. After my chair approved chapters 1-2, he said after writing and revising chapter 3 I would be ready to schedule a proposal defense. Then I get back an email stating that the dissertation rubric had changed and all my articles used for my study needed to be peer reviewed and were beginning to be dated. After 4 years yes...some of the research would begin to be dated. My three chapters at this point were a total rewrite. Having hired a corporate editor to review my work, she was disturbed that my first 3 chapters were not being approved. Already going beyond the 3 year program with over \$70,000 in debt and receiving emails from my chair stating this program was a "process", I withdrew from the program in December of 2008. Stuck with a 900 loan payment, no degree, and the emotional stress of going through almost 4 years to receive nothing...I began to see what the word "process" meant to Walden. Another semester, more money and nothing but heartache for me. Out of 6 educators from Coffee County School System only one was able to receive her Doctorate Degree within the 3 year time frame.

Excerpt from "Got a Class Action" (available at: <http://gotaclassaction.com/walden-university-and-laureate-education-inc-named-in-class-action-lawsuit-over-systematic-prolonging-of-the-thesis-and-dissertation-process/>).

80. Another poster confirmed that her 18-month program was now in its fourth year.

Carolyn B. said
255 days ago

My 18 month program is now in its 4 th yr. My chair actually submitted a 14month old draft to form and style for review instead of the finished product(its been complete for 6 months now). I didn't even receive an apology. I am now at 130,000 in debt for a degree I don't think will ever be finished.This quarter,our class doesn't have an instructor but they still took money for it. Is that legal??

Id.

81. Taken together, the 2012 Senate Report, the history of Plaintiff and the stories of the above students (as well as many others referenced herein) confirm that Walden and Laureate's representations concerning the timeline to completing a Walden PhD were false. Further, with a doctoral "completion" rate of, upon information and belief, less than 10% of its doctoral student population, any statements concerning a "minimum completion time," or a completion time at all, is false and misleading.

82. Instead, Walden and Laureate should tell prospective students they'd be lucky to obtain a PhD, let alone timely obtain a degree.

THE TRAP OF THE WALDEN DISSERTATION PROCESS

83. Walden doctoral degrees differ from its bachelor's degrees in several important respects; however, most pertinent to this Complaint, after completion of course work, doctoral degrees require independent study and research by the student.

84. At Walden, each doctoral degree candidate, regardless of discipline, must go through the process of completing a dissertation.

85. The Walden Student Handbook reflects that the dissertation process can be completed in as little as 13 months.

Dissertation Timing

Doctoral students who want to graduate in a specific quarter must plan their program carefully as follows or their graduation date will be delayed:

- Begin planning for program completion at least 13 months in advance of the anticipated graduation date

Ex. R, Excerpts, 2013-2014 Walden Student Handbook at 273 (December 2013), available at <http://catalog.waldenu.edu/content.php?catoid=117&navoid=32382>, and Ex. S, Excerpts, 2010-

2011 Walden Student Handbook (Sept. 2011) at 189, available at

<http://catalog.waldenu.edu/mime/media/58/1050/Dec+2011+Handbook+FINAL.pdf>.

86. Further, as stated above, it is common for Walden recruiters to represent that the dissertation process can be completed in 18 months.

87. The dissertation requires the consultation and approval of faculty and institutional entities at Walden before the degrees may be completed. In fact, it is imperative that students be able to work closely with the faculty members, whose approval is necessary for the advancement of the dissertation.

88. With an online degree, this is more difficult as most students cannot regularly interact with their chairs, members or advisors (or other students), unless they do so through the Interactive Blackboard System provided by Walden. Through this confined communication system, often doctoral students feel isolated and without direction.

89. There are five stages of the dissertation process: the Premise (or preliminary Prospectus), Prospectus, the Proposal, conducting the study and/or research that is the subject of the dissertation, and defending the completed dissertation.

90. At each stage of the process, the student must gain approval of the dissertation supervisory committee chair and a supervisory committee member. Further, at each stage of the dissertation process, the student depends on the timely response of the dissertation supervisory committee chair and member to advance the process.

91. To start the dissertation process, the student must enroll in the dissertation course for a student's respective field of study. Typically, this will be the only course/class the doctoral student will enroll in for that quarter (and for their remaining quarters at Walden). Despite this, the doctoral students will still pay full tuition.

92. Once enrolled in the dissertation course, the student must develop and draft a Premise. The Premise is a brief document which identifies a preliminary topic for the dissertation. The Premise is also used to locate faculty members who will form the dissertation supervisory committee.

93. After determining a topic and drafting the Premise, the student must nominate the dissertation supervisory committee. The dissertation supervisory committee has two members – a committee chair and a committee member. The dissertation supervisory committee is supposed to provide guidance to the student on both the content and the methodology of his or her dissertation. Further, once the committee chair and member accept their nominations, they must approve of the Premise.

94. The Student Handbook describes Doctoral Committee Member Roles.

Faculty members in Walden University doctoral programs who accept the duty of serving on a dissertation or doctoral study committee assume a dual responsibility of high importance. **One part is service to their students**; the other is service to the academic practice, discipline, and professional field to which the dissertation is related. For the first part, expectations concerning the faculty service to be performed are determined by students' needs, and by university academic policy pertaining to how these needs are to be addressed. For the second, expectations are set both by university academic policy and by policies and practice that frame acceptable work in the discipline and professional field at large.

Ex. T, Excerpts, Dec. 2011 Student Handbook at 174 (emphasis added); *See also* Ex. R at 258.

Further, “Walden intends that dissertation/doctoral study committee members work as a team, directly guiding students through the proposal, research and analysis, and ultimately the final oral presentation.” Ex. S at 174; Ex. R at 259.

95. The Prospectus is meant to build on the Premise and serve as the foundation of the Proposal. The goal of the Prospectus is to develop a plan for the Proposal and ultimately outline the basic structure of the dissertation. The Prospectus must be approved by both the dissertation

supervisory committee chair and the committee member before proceeding to the next step, the Proposal.

96. The Proposal is essentially the first three chapters of the dissertation, outlining the rationale for conducting the study and describing the design and methodology of the study. Students must work closely with the dissertation supervisory committee chair and member to complete the Proposal. As the Handbook promises, the dissertation supervisory committee chair and member are to “guide” their students “through the proposal.” *Id.*

97. The Proposal must be approved by the dissertation supervisory committee chair and member before the student can move on to the next step in the dissertation process.

98. In addition to approval by the dissertation supervisory committee chair and member, the Institutional Review Board (“IRB”) must approve the Proposal.

99. After the Proposal is approved by the IRB, the student must conduct the study and/or research that is the subject of the dissertation, and finish drafting the dissertation.

100. The dissertation supervisory committee chair and member must approve the completed dissertation, which is then submitted to the University Research Review (“URR”) for approval.

101. At this point, the student must orally defend the dissertation.

102. After successful oral defense of the dissertation and committee approval of the dissertation, the student has essentially completed the dissertation process and it may be submitted for publishing.

WALDEN’S SYSTEMATIC PROLONGING OF THE DISSERTATION PROCESS

103. The dissertation process described above is plagued by a complete disregard for Walden’s promises and policies. Instead, Walden creates a seemingly endless process that drags on for quarter after quarter, year after year for students. This disregard by Walden is intentional.

That is, it is part of Walden's knowing and intentional scheme to unduly prolong the dissertation process to extract additional tuition from its students, for the purpose of increasing Walden's profits, at the expense of those students it is purportedly seeking to educate.

104. First, the process for obtaining a dissertation supervisory committee chair and member is time consuming and difficult. Making matters worse, for some students retaining the committee chair and committee member throughout the entire dissertation process is an additional challenge.

105. Walden instructs students to consult the Faculty Expertise Directory to find Walden faculty members capable of serving on the dissertation supervisory committee as either committee chair or committee member. The dissertation supervisory committee must feature an expert on the student's content and also an advisor on methodology. In order to obtain a dissertation supervisory committee chair and member, the student must submit a Committee Member Nomination form, along with a copy of the Premise, to the nominee. If the nominee agrees to serve on the committee and that nominee's service is approved by the program director, then the student may begin finalizing the Premise.

106. However, the committee chair and member nomination process does not run as smoothly as Walden represents to its students. First, the student may spend multiple months attempting to obtain the agreement of a faculty member to serve as a dissertation supervisory committee chair or member.

107. Even worse, once the faculty members agree to serve in the roles of dissertation supervisory committee chair and member, they sometimes quit, are fired, or stop responding to the student. Upon information and belief, retention of committee chairs and committee members is a systemic, institutional issue. Further, this issue is not corrected by Walden because 1) it is in

Walden's best, financial interest to prolong its students' time in the dissertation process and 2) Walden is not willing to spend the necessary amount to hire and retain quality, Committee-qualified employees (instead, Walden rather spend its money on marketing to bring in additional students).

108. When a Walden student's dissertation supervisory committee member or committee chair chooses to quit his or her role on the committee, the student essentially is required to start over from scratch.

109. The student is forced to locate an additional faculty member to serve in the vacated role. However, even if the student locates a new faculty member to serve in the role, the new committee chair or member may disagree with the student's Prospectus or Proposal. As a result, regardless of whether or not the prior committee chair or member approved the Prospectus or Proposal, the student must now begin the process anew and address the new committee chair or member's concerns.

110. Walden's requiring of students to find substitute faculty members and the delay it causes violates its rules. Walden's Handbooks promise that if a faculty member suddenly departs, *Walden* will take the appropriate steps to rectify the situation.

Unexpected interruptions: Faculty services may be unexpectedly interrupted because of an instructor's death or prolonged ill health, or because of an instructor's discontinuation of association with the university. In such cases, **the student's associate dean/executive director, or designee, ensures that faculty services are restored to all affected students.** The associate dean/executive director or designee communicates with affected students throughout the restoration process until appropriate assignments are finalized.

Ex. S, Excerpts, 2010-2011 Handbook at 123 (emphasis added); Ex. R, Excerpts 2013-2014 Handbook at 214-215.

111. As stated above, Walden repeatedly broke this promise, in that once Committee chairs or members left, Walden forced its students to find replacements. This delay always benefitted Walden, because any delay to the dissertation process likely led to additional tuition payments.

112. Further, upon information and belief, the turnover rate of dissertation supervisory committee chairs and members is high. This high turnover results in Walden students being caught in a cycle of finding supervisory committee chairs and/or members, and gaining their approval, only to start the process again when the committee chair or member leaves Walden or simply stops responding. The turnover is intentional and part of Walden's policy to essentially hold its students captive to the tuition generating machine that Walden has constructed, while it continues to spend its money on marketing to lure in additional students.

113. In addition, Walden students depend on the dissertation supervisory committee chair and member for guidance and feedback during the entire process. As part of Walden's overall scheme, however, that much-needed counsel is consistently lacking, and frequently nonexistent.

114. Walden has a formal policy which states that the supervisory committee chair and member must respond to requests from students for commentary, feedback, or even formal review, within 14 business days.

115. However, as part of the Walden's scheme, Walden faculty serving in supervisory committee capacities regularly and routinely do not abide by its 14 business day response requirement. This is especially frustrating for Walden students because they literally cannot progress beyond the Prospectus or Proposal without the approval of the supervisory committee chair and member. Thus, it causes significant delays in moving forward with, and the completion of, the dissertation process.

116. Upon information and belief, most Walden doctoral students experience a breach of the 14-business day response period at least once (and usually many more times) during the course of their dissertation. Walden's breach of its own rules thus unnecessarily prolongs students' efforts to obtain their degrees, and results in students extending their enrollment in their respective dissertation course and paying additional tuition.

117. In fact, even a 14 calendar day "response" time is too long. 14 calendar days to receive input comprises 1/6 of a Walden quarter. While waiting for input (the substance of which is most times guidance on how to proceed), the student essentially cannot advance his or her dissertation for two weeks, yet still must pay tuition during that time frame. With a 14 calendar day response time, if a student would require input from their chair even just three times in a quarter, that would amount to a loss of half of a quarter. A 14 business day response time then is, for all intents and purposes, a three-week delay.

118. Upon information and belief, most Walden doctoral students experience a loss of a supervisory committee chair or member at least once (and usually many more times) during the course of their dissertation. Walden's failure to regulate the supervisory committee program thus unnecessarily prolongs students' efforts to obtain their degrees, and results in students extending their enrollment in their respective dissertation course and paying additional tuition. Further, Walden's failure to select a replacement and instead force its student to replace the chair or member further prolongs the students' enrollment and tuition payments.

119. Dissertation courses at Walden can cost about \$3,000 or more per academic quarter. Accordingly, the practical effect of Walden's tuition generation scheme, which forces repeated enrollment for additional quarters, is extremely expensive for students and highly lucrative for Walden.

120. Walden, as experienced by Plaintiff and the Class members, is intentionally and deliberately using its dissertation process as a means of improperly extracting tuition and generating revenue. Walden has intentionally and knowingly directed and implemented a dissertation process that is fraught with inefficiencies, meant to ensure that students do not receive the timely responses and attention that they were promised, and creates inordinate turnover of faculty and supervisory committee chairs and members. All of this is done without any honesty or transparency by Walden regarding the actual time and expense that its doctoral students will incur in an effort to complete their degrees...if completion is even possible. Further, it is an insidious scheme in that, once students have spent considerable time and expense embarking on the process, they are left with two options in the face of the process delays: 1) quit the program, thereby essentially throwing away all of the time and money expended; or 2) continue to enroll in additional quarters with the hope of completing the program someday before they run out of money.

PLAINTIFF THORNHILL'S EXPERIENCE AT WALDEN

121. Plaintiff Thornhill was a student at Walden pursuing her Doctor of Philosophy in Management, specializing in Leadership and Organizational Change.

122. Plaintiff Thornhill enrolled in her doctoral program in 2011.

123. Between the summer of 2011 and Spring of 2014, she completed the following doctoral-level courses: Foundations for a Ph.D. Study; Research Theory; Managing Organizational Systems & Complexity; Management of Decision-Making; Leadership, Influence & Power; Challenging Conventional Leadership; Qualitative Reasoning & Analysis, Changing Face of Leadership; The Socially Conscious Leader; Developing a Prospectus; Quantitative Reasoning &

Analysis; Advance Qualitative Analysis; Applications of Current Topics in Management and Writing a Proposal.

124. Plaintiff received only As and Bs in her courses.

125. Upon completion of those required doctoral-level courses, Plaintiff Thornhill began her dissertation in September 3, 2013.

126. Plaintiff Thornhill enrolled in dissertation courses starting in the fall quarter of 2013, and continued with these classes in the winter quarter 2013, spring quarter of 2014, summer quarter of 2014, fall quarter of 2014, winter quarter of 2014, spring quarter of 2015, summer quarter of 2015 and fall quarter of 2015.

127. For all of the quarters she attended, Plaintiff Thornhill paid \$3,360, \$2,390, \$4,710, \$4,735, \$4,935, \$2,515, \$6,160, \$2,610, \$2,610, \$2,610, \$6,570, \$3,990, \$3,990, \$3,990, \$4,110, \$4,110 and \$4,110.¹⁸

128. Plaintiff also completed three residency courses, obtaining the necessary satisfactory grades to advance from each of those courses.

129. For each of these residency courses, Plaintiff Thornhill paid approximately \$3,500, including enrollment of \$1,039, \$1,125 and \$1,125 for each, plus hotel, flight and meals for five days.

130. However, progress on her dissertation remained elusive for this A/B student because of the systematic and intentional manner in which Walden delayed her.

131. Wanting to be sure that she was using her time at Walden efficiently, Plaintiff Thornhill started working on her preliminary Prospectus on March 4, 2013. Her preliminary Prospectus

¹⁸ Each quarterly payment consisted of tuition and a \$60, \$70, \$95 or \$110 or \$120 technology fee.

topic was submitted it to Dr. David K. Banner (her dissertation supervisory committee chair and content expert), who approved it on September 15, 2013.

132. On Feb. 23, 2014, Dr. Steve Tippins agreed to be her dissertation supervisory committee member and methodology expert, to complete her supervisory committee.

133. On February 14, 2014, Plaintiff Thornhill submitted her preliminary Prospectus to both Dr. Banner and Dr. Tippins.

134. On June 4, 2014, it was approved

135. When Plaintiff Thornhill began working on her Proposal, she was initially allowed to communicate and receive input directly from her dissertation supervisory committee chair and member on her dissertation which were typically accomplished via email through Walden's Interactive Blackboard System. Plaintiff Thornhill relied upon such input to gain input on whether or not she was headed in the correct direction and to receive general pointers.

136. Plaintiff Thornhill also relied upon Walden's Writing Center, a resource that would assist with confirming her Proposal was complying with APA writing guidelines. Further, Plaintiff Thornhill was allowed to choose an advisor with the specific background necessary to understand and provide further input on Plaintiff Thornhill's Proposal.

137. According to Walden's current webpage, students who utilize the Writing Center can receive the following types of input:

Sample Paper Reviews: Overview

Wondering what to expect from your Writing Center review? Below are the types of assignments we review, along with sample feedback. Feedback will vary among writing instructors but will consist of some of these:

- Explanations of errors
- Links to resources
- Questions or reactions from a reader's perspective
- Recommended next steps
- Revision strategies
- Highlighted patterns
- Models of effective writing
- Video clips to watch

Available at: <http://academicguides.waldenu.edu/writingcenter/paperreviews/samplerreviews>

138. Both direct access to her dissertation supervisory committee chair and member and use of the Writing Center were important resources, and Plaintiff Thornhill relied upon them in advancing along the path to finishing her dissertation.

139. Walden, however, took both of these resources away from Plaintiff Thornhill and all other members of the Class.

140. On or about January 2, 2015, although it was still a resource available for undergraduate students, Walden abruptly prohibited doctoral students from utilizing and relying upon the Writing Center for their dissertations. Despite taking away this important resource, doctoral students' tuition did not decrease.

141. Also, on or about October 30, 2014, doctoral students were informed about a new procedure in which any contacts for specific advice from their dissertation supervisory committee chair and members could only take place through the MyDR computer application. However, doctoral students were specifically prohibited from using MyDR until they had completed Chapters 1-3 of their dissertations (*i.e.*, their Proposals).

142. This placed Plaintiff Thornhill and other members of the Class in the untenable situation of needing to complete the first three chapters of their dissertation, one of the most important foundation steps in the dissertation process, before they could use the MyDR service. In other words, despite paying full quarterly tuition for the educational services that Walden said it would provide including, but not limited to, assertions from the Handbook that “Walden intends that dissertation/doctoral study committee members work as a team, directly guiding students through **the proposal**,” Plaintiff and other members of the Class were now limited to only receiving the most general input on the Proposal. Ex. S at 174; Ex. R at 259 (emphasis added).

143. This was a substantial hurdle for Plaintiff Thornhill and members of the Class. In particular, Chapter 3 was the proposed methodology of the dissertation, which was often quite complex (requiring explanations of how to carry out the research, which tools to utilize, how to prepare and conduct meaningful interviews and observations, etc.). For such an important portion of the Proposal (and the dissertation process as a whole), specific input was often necessary to ensure proper methodologies were utilized. In particular, Plaintiff Thornhill required input on instrumentation, transferability, confirmability and dependability for Chapter 3. Despite this, Walden prohibited Plaintiff Thornhill and the members of the Class from receiving anything but the most general input from the guidance from their Committee advisers that they had been promised.

144. For example, when Plaintiff Thornhill contacted her chair Dr. David Banner about specific guidance she needed on her Proposal, she was denied such input due to the Walden policy.

David Banner <david.banner@waldenu.edu>
To: LaTonya Hall <latonya.hall@waldenu.edu>

Tue, Dec 9, 2014 at 11:53 AM

LaTonya...I cannot review it until you have a draft of all three chapters of the proposal.....

check with MyDR...there may be a way to do a draft.....

Dr.B.

Ex. T, Dec. 9, 2014 email exchange.

145. This was a direct violation of Walden's Student Handbook which required the doctoral study committee members to "work as a team, directly guiding students through the **proposal**, research and analysis, and ultimately the final oral presentation." Ex. S at 174 (emphasis added); Ex. R at 259.

146. This happened not once, but multiple times, when Plaintiff Thornhill requested input on the Proposal, but again was denied such input...until she completed Chapters 1-3 (and thus could access MyDR).

David Banner <david.banner@waldenu.edu>
To: LaTonya Hall <latonya.hall@waldenu.edu>

Mon, Jan 19, 2015 at 7:45 AM

LaTonya...the Walden system can be unreliable...please submit all plans to me directly.

Also, submit the prospectus through MyDr...I cannot give you feedback unless you do that...

Dr.B.

[Quoted text hidden]

Ex. U, Jan. 19, 2015 email.

147. Plaintiff Thornhill's situation was straight out of *Catch-22*. While the Walden recruiters promised that she could finish her dissertation in 18 months¹⁹ if she listened to her advisers, she was now prohibited from "listening" to her advisers until she finished the Proposal/Chapters 1-3 of her dissertation...chapters that she needed input from her advisers to complete. Further, while the Walden Handbook promised that her advisers would work with her as a team on the

¹⁹ Also, the Student Handbook indicated the dissertation process could be completed in 13 months.

Proposal, they expressly would not work with her (as a team or otherwise) on the Proposal until it was completed.

148. Problems arose in the dissertation process for Plaintiff Thornhill even prior to the Proposal Catch-22. For example, Plaintiff Thornhill started working on her preliminary Prospectus on March 4, 2013. Her preliminary Prospectus topic was approved by Dr. Banner (her dissertation chair) on September 15, 2013. Despite this, at a residency in December 26-30, 2013 in National Harbor, Maryland, Dr. Kenneth Sherman, a resource to provide feedback on dissertation topics and prospectuses, told Plaintiff Thornhill that she should change her Prospectus topic to focus more on millennials. Despite already gaining approval from her chair, Plaintiff Thornhill relied upon the advisor's input, took time to create a new topic, and submitted it to her dissertation supervisory committee chair for approval. In response, Plaintiff Thornhill's chair told her to disregard the advice given to her at the December 2013 residency, and instead utilize her initial topic. Through these inconsistent instructions from her advisers, Ms. Thornhill lost progress on her dissertation from the last quarter of 2013 and first quarter of 2014, for which she still had to pay.

149. Further, delays were endemic at Walden, as shown by the following email from Plaintiff Thornhill's chair.



LaTonya Hall <latonya.hall@waldenu.edu>

MGMT-9000-12,Doctoral Dissertation.2015 Summer Qtr 06/01-08/23-PT1: MyDr

1 message

David Banner <david.banner@waldenu.edu>

Mon, Jun 1, 2015 at 6:01 AM

Mentees: I have had so may requests for MyDr work lately that I have regrettably lost track of who needs what....if I haven't responded to you in a timely way, PLEASE let me know what I need to do to help...

Dr.B.

Ex. V, June 1, 2015 email.

150. Over the course of Plaintiff Thornhill's time at Walden, she experienced innumerable delays and multiple instances of faculty members failing to fulfill their responsibilities as dissertation supervisory committee chairs and members due to the hurdles Walden itself placed in their way. In other words, Plaintiff Thornhill has been subjected to, and victimized by, the intentional and knowing scheme of Walden to prolong the dissertation process so that it could generate additional tuition revenue. Walden has subjected the other members of the Class to the same scheme, thereby causing them to be damaged in the same manner as Plaintiff Thornhill.

151. As of now, Plaintiff Thornhill has paid for seventeen quarters during her time at Walden, including seven quarters of dissertation course work and three residencies. Despite being promised it would take 18 months to complete her dissertation, at the time she stopped enrolling at Walden, she was still only at the Proposal stage, less than 3/5 of the way towards completion. With the limited resources she was allowed, Plaintiff Thornhill estimates it would have taken her over a year and approximately \$30,000 to complete her dissertation, if completion was even possible given that she needed guidance that was not forthcoming on her Proposal.

Unfortunately, she was forced to take a leave of absence after the fall quarter of 2015.

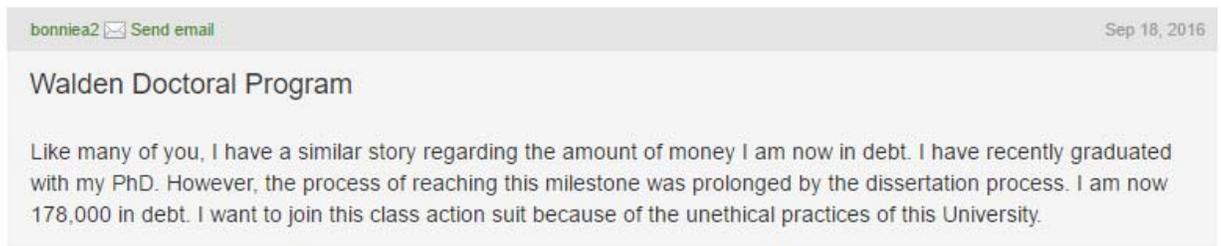
152. Had Plaintiff Thornhill been made aware of Walden's abysmally low completion rate, she would not have enrolled in the doctoral program or paid the tuition, residency fees (including travel), supply costs and other fees charged by Walden. Further, had Walden not misrepresented the timeline, costs, hurdles to obtaining a dissertation or had it actually disclosed its true scheme, Plaintiff Thornhill would not have agreed to pay for the educational services offered by Walden.

153. Tellingly, almost a year after she left in August 2016, Walden re-opened the Writing Center to doctoral students for doctoral premises and doctoral prospectuses (presumably because

Walden had come under increased scrutiny about taking away such an important resource). This confirms the intense pressure placed on its doctoral students by removing this invaluable resource.

154. Walden has intentionally and unjustly prolonged Plaintiff Thornhill's work toward her doctoral degree and extracted extra tuition payments from her for dissertation coursework that would never have been necessary but for Walden's scheme to generate additional tuition revenue and minimize its overhead so that more of the revenue could be spent on marketing to ensnare more students. As a result of the scheme, Plaintiff Thornhill had to withdraw, knowing that to complete the educational process, at a minimum, would require more time and more tuition payments beyond what she had reasonably anticipated she would have had Walden not engaged in its illegal conduct.

155. Plaintiff's experiences mirror those of thousands of other students. A comprehensive collection of such complaints are locate at: <http://www.complaintboard.com/walden-university-14025.html> and <http://gotaclassaction.com/walden-university-and-laureate-education-inc-named-in-class-action-lawsuit-over-systematic-prolonging-of-the-thesis-and-dissertation-process/>. Some of the more relevant complaints are reproduced below, all focusing on the unfair workings of Walden's dissertation process.



Acts333  Send email

Sep 7, 2016

Doctoral in DNP

I've been in this program since 2009 and have seen professors quit, Chair persons change, courses added, e-mails disappear, conflicts in time zones and so many other excuses. Walden should be reported to the Department of Education. Their headquarters in Minnesota should be reported to the Atrorney General in the state. Their practices and recruitment should be investigated. What is the percentage of African Americans who take courses are graduating more quickly than other groups. What political connections did they have with Bill Clinton. A major law suit should be filed in all 50 states to recover hundreds of millions today dollars this university has taken from hard working citizens

juliedefelice  Send email

Sep 6, 2016

Way Too Much Money; No Returns On My Investment Yet

Wow, I have been experiencing some of the same problems notated above.

I am stuck in the proposal phase of my Ed.D degree at Walden.

After comparing rubrics, I submitted to the URR now 4 times, I have passed sections previously that are now deemed as not passing. I had a problem in the very beginning of this journey with a chair person who lived across the globe from me. We were 8 hours apart. How can I make progress when we live in time zones that far apart??? After a fight to get a change, I got an awesome person to help me, but now my URR, who was friends with the first chair person is making my life unbearable. I receive mixed communication and now a grade that keeps changing from draft to draft. My chair and 2nd seems to think the proposal is just fine, but every time the URR gets it, she says it is not. I am spending mega bucks and now have school loans that are in the \$100K+. I would love to be part of this class action lawsuit. I think there is a scam someone going on here. I would also like to be reimbursed for all the money I have spent when there has not been progress made towards graduation.

kerrnonne42  Send email

Sep 4, 2016

Walden University

I am 287,000 in debt. If I continue with the PhD program in psychology it would take another year or two. I am stuck in proposal, and there is absolutely no help with regard to methodology. I have never defaulted on a loan in my life, and I can't imagine how I will pay off a house. I had to take plus loans. They are not eligible for income based repayment. I am going back to work as a counselor. It took 6 years to spin my wheels, and lose everything. I am suffering from depression. What is happening in this country? How could the federal government even fund this program? This is awful. The residencies were expensive. I had to leave my job to complete 2,750 hours of clinical full time, and needed to take more loan money. This is just awful. Unfortunately, I am losing hope that the government will do anything about this. I need help. I have been in the program from 2010.

amhPhd_Scam  [Send email](#)

Aug 24, 2016

11 Years PhD Program \$200k in debt

Began my doctorate program with Walden University in September 2003. Completed all required course work before beginning the dissertation process. Problem!!! The course work (mostly independent white papers on a sundry of business management topics) did NOT prepare me for the dissertation process. Why? Walden knew that if they had prepared its ABD (all but dissertation) students with significant courses related to the PROCESS of writing a dissertation (URR, ethical reviews, etc.) they would not make as much money. Fast forward to 2009 - my dissertation process took me two years to complete. Why? My dissertation chair refused to accept my methodology. So I changed it. Then, another member of the dissertation committee (brought on 1 1/2 years later) felt that he didn't like my research - even the title! THEN . . . the another member of the committee suddenly left the university. University failed to notify me; but, I couldn't move forward until the committee member was replaced (all the while, I'm being required to pay tuition). I did complete the program . . . 11 years and \$200k in debt (my credit is so messed up). Why did I continue to attend Walden? At the point in which I knew that the school was scamming me - it was too late. I had to complete it (borrowing from parents, taking out credit cards to pay tuition, deeper and deeper into debt). It was better to have my doctorate, than not to have my doctorate.

JJanaii  [Send email](#)

Aug 24, 2016

Walden's Doctoral Program

I have a similar story as those written here. I have been a part of the doctoral program at Walden going on five years now and every year I was vocal about the waste of time with the two years of "coursework" that I learned absolutely nothing. Then starting the project study process I really started noticing the scam beginning. I had three chairs up to this point and after working on just the proposal phase for two years I am going nowhere. I hired an outside publisher to help me through the process but even that is not really helping as much as I thought it would. I am on my third round of proposal approval and one round of URR. I am almost \$200,000 in debt with my undergrad and other degree loans. Walden alone is \$100,000. I will be glad to be a part of a class action lawsuit!

Mari

cassie32368  [Send email](#)

Aug 24, 2016

Walden Fraud and still no Ph.D

I began my Ed.D quest in 2011 and began to work on my dissertation in 2014. They prolonged approval at the dissertation stage at which I knew it was going to be an uphill battle. I requested a new chair because I knew my work was of quality. I'm now thousands of dollars in debt! I pray thatthese predatory practices at Walden University are looked into by the White House

KNWMN  Send email

Aug 20, 2016

Let's get this law suit against Walden off the ground

I have been communicating with students as angry at Walden as I am. Time to move this lawsuit forward.
Greetings:

Last week I twice spoke with an experienced reporter from a major newspaper. They are very excited about running with this story. It can be perhaps on the same level of fraud and corruption as the for profit Corinthian College. I have told the reporter my story, and have three others lined up to speak with her next week.

Please send me your story with Walden. I'll forward it to the reporter with your email contact info and she'll reach out to you. We students are doing this to attract the attention of a lawyer. Let's get this thing going.

My story goes like this. I started my Doctorate with Walden in 2008. All went well and my Chair approved my study and I was to start my University Research Review (URR) in December 2011. My chair was then dismissed by the university and I was given a new Chair and a new Second. My second required that I start my study all over. Three years late in 2014 my Chair was about to approve me to start URR again. Then that chair was removed and I again received a new Chair and new Second. The new second was not assigned until about 6 weeks into the class. The very next day my father-in-law died so not much progress was made during that semester. The next semester I was again approved to begin URR and the university dismissed me for lack of progress. I made URR and they call that a lack of progress?! So here I am over \$100K in debt, having had my study formally approved twice by two different chairs, yet I have no degree.

KNWMN  Send email

Aug 2, 2016

Let's sue Walden

Zkeithnewman@yahoo.com

My Walden story begins in 2008 and all went well until January 2012. I had just (in December 2011) been approved to begin the URR phase of my doctoral program. Walden dismissed my chair, assigned a new one, and I had to start all over. In 2015, after accruing 3 more years of debt my chair was about ready to approve me to start URR again. Guess what!?! They changed my chair again. I stayed with it and was approved to start URR but am now too old and too far in debt to continue at Walden. After 8 years I have nothing but a debt that will not disappear until I am 70.

Please, let us join together. Contact me at my yahoo email address and let's get going.

760student  Send email

Jun 30, 2016

to much time in doctoral study stage

I have had two chairs, 3 second committee members. I was told to use the walden university writing center to get my doctoral study paper APA compliant. I did and my chair said they did a bad job. Each second committee member required 1000's of changes to my document and I made the changes, once complete I would have a new second committee member. I ran out of money using approved APA editors and my document would still get kicked back. This needs to stop, I just want to finish and graduate.

sbealldavis  Send email

Jun 7, 2016

Walden University Unethical and Fraudulent!

Please add me to the Walden Class Action Law Suit! I started Walden's doctoral program in 2007 and now it's 2016. I have a 3.7 GPA in course work completed, all residences completed plus extra, submitted my prospectus waited almost 3 months @ over \$4k per quarter to get a URR assigned, wrote my initial proposal- rejected but comments were needs minor changes and organization. As time went on I kept re-submitting and getting comments that just a few more changes. I hired an editor, have paid several hundred dollars to get help and each time I'm told how wonderful the paper is but just make these few changes and you'll move forward. I'm more than \$200,000.00 in debt now government loans and 40,000 in personal loans. I'm 60 years old now and still no degree nor moving pass URR. There has also been instances where the 14 day review period took more than 20 days pushing me into another quarter adding more debt to the already enormous debt. Lies, deception and false hopes is what I've experienced. I have lots of documentation. Please add me to the lawsuit, the legacy I once dreamed of leaving for my children and grandchildren has been destroyed. I'm still waiting for Walden to create a way to remove me from the school or continue to drain me until I can't get another loan to continue. They've told me that if I take a leave of absence, I more than likely can't get back I'm now another \$8000 in debt to them trying to complete the Summer session to get pass the URR. They are predators the approval of the proposal process has been going on since 2014 now...See below

Student resubmits Proposal committee rubric analysis Jun 02 , 2016
 Proposal not ready for URR Approval May 21 , 2016
 Student resubmits Proposal committee rubric analysis Apr 25 , 2016
 Student resubmits Proposal committee rubric analysis Apr 22 , 2016
 Proposal not ready for URR Approval Apr 11 , 2016
 Student resubmits Proposal committee rubric analysis Mar 30 , 2016
 URR Denies Proposal Feb 22 , 2016
 Proposal ready for URR Approval Feb 12 , 2016
 Student resubmits Proposal committee rubric analysis Feb 02 , 2016
 Proposal not ready for URR Approval Nov 10 , 2015
 Student resubmits Proposal committee rubric analysis Nov 01 , 2015
 Proposal not ready for URR Approval Oct 23 , 2015
 Student resubmits Proposal committee rubric analysis Oct 20 , 2015
 Proposal not ready for URR Approval Sep 10 , 2015
 Student resubmits Proposal committee rubric analysis Aug 27 , 2015
 Student resubmits Proposal committee rubric analysis Aug 27 , 2015
 Student resubmits Proposal committee rubric analysis Aug 27 , 2015
 Proposal not ready for URR Approval May 13 , 2015
 Student resubmits Proposal committee rubric analysis Apr 21 , 2015
 Student initial submits Proposal for committee rubric analysis Apr 19 , 2015
 Program Director Approves Prospectus Jan 12 , 2015
 Prospectus Ready for PD Approval Dec 30 , 2014
 Student resubmits Prospectus for committee rubric analysis Dec 10 , 2014
 Student resubmits Prospectus for committee rubric analysis Dec 09 , 2014
 Prospectus not ready for PD Approval Dec 08 , 2014
 Student initial submits Prospectus for committee rubric analysis Dec 08 , 2014
 Student initial submits Prospectus for committee rubric analysis Nov 10 , 2014

Minglee1!  Send email

May 12, 2016

Doctorial program

I have many of the complaints as most of collogues. I entered Walden University 2011, did very well through the course work and earned 4.0. Once I entered the doctorial program (5 stages to complete) its been one disaster after another. Assigned to a verbally abusive professor and proving derogatory statement were made through email and phone conferencing, I was transferred to another professor. Unfortunately the first abusive professor is the "head" of the department and over sees everyone. Therefore, not a lot changed except the second refused to speak with me without a committee and he is always "super" nice without productive feedback. After 3 months in the first stage, he sent me an email to move forwardtask stream had passed my prospectus with 3/5 points. Only to receive an email 4 weeks into the course 2nd stage that stated the "committee" my previous professor said I did not pass. Eventually, he gave me a U I had to take off a semester and fight to get back in. Returning 6 months later, I hired a professor on a doctorial committee in another state to review my prospectus- she did and stated there were a few errors that needed corrections . For 12 weeks the Walden professor returned my paper with "minor" problems and stated major improvements....etc. Ten days prior to the semester ending I submitted my paper, it was not returned until 5 days AFTER the course ended stating I received another U and I should rewrite my entire paper. I also have a problem with the course survey that MUST be completed 5 days prior to the course ending or you will not get a grade. I was told they are confidential, but I know for a fact that the professors do reading them prior to grading. 5 years in I have run out of money and still no degree.

syndibradley  Send email

May 9, 2016

Unfinished EdD Dissertation

Please let me know if there is in fact a class action law suit against Walden University. I too began the EdD process in 2008. When I began working on the dissertation, my initial 1st Chair person fell off the face of the earth after 2 semesters, and 2 weeks into the 3rd semester, the head of the department began asking us questions of this Chair person's whereabouts. Within the next 2 weeks, we were added to another Chair person's caseload. She didn't approve of the proposal I had already completely (nearly) established with the missing Chair person. So, I began with a completely new topic. I never received positive feedback and she refused to talk to me until I had completed the 1st section. Well, after 3 semesters with her, I requested a new Chair. Denied. So, I took a 6 month break. Upon returning, same Chair person. After 1&1/2 semesters more with her, they finally granted me another Chair person. This Chair person loved my new (3rd) topic and we worked for 18 months to finally get to the URR. The URR loved the proposal, gave feedback and I worked for 4 weeks to revise and resubmit. When I resubmitted, I was informed I had a new URR. Then 2 weeks later I was informed I had yet another new URR. This 3rd URR person finally after 33 days returned the proposal with over 300 negative comments. My Chair quit and they gave me a 4th Chair person and another new URR. I cannot do this anymore. This is ridiculous. I would love to know if there is really a class action law suit against this institution. I can be reached at syndi.bradley@yahoo.com Thanks, Bradley.

khen2011  Send email

Mar 29, 2016

Walden University

I enrolled in a doctorate program at Walden University in 2011 and I am still working with my chair to revise and edit my project study. Each semester, I may have two to three opportunities to receive feedback from him. According to the project study guide, the committee members have 14 days to provide feedback. My chair takes all 14 days to provide feedback and the feedback is inconsistent. I contacted the advisory team and was told it often takes multiple years to complete the project study. However, when being recruited, I was told it was a 3-year program (most students complete in 3 years). Even after contacting the program director, little has changed, with the exception of upsetting the committee members. I think I was misled.

Fer2848  Send email

Mar 20, 2016

Walden University Purposely Prolonges Degree Programs

I have many of the same complaints listed below. I enjoyed my coursework at Walden with a high grade point average. However, after almost 2 years my proposal still is incomplete. My committee chair gives pitiful feedback, and I usually have to request it be sent back after 14 days. When I raised concerns, nothing was done. It is unacceptable to be spending \$20,000 a year for an advanced degree when staff are not fit for helping students succeed!

kitd  Send email

Mar 19, 2016

Unresponsive Faculty and Administration

I was enrolled in Walden for two semesters. Despite have been very successful in traditional graduate programs, I was unable to get my initial proposal approved, but never received clear rationale for the rejection. It took my first "mentor" 6 weeks to respond to me and when he finally did his communication skills were so circular that I could not understand what he was saying. I asked for a transfer. Several months later I was assigned a new adviser, but this one was no more responsive than the first. So - I paid for two semesters through student loans that were completely useless. I made numerous efforts with the administration to resolve this issue, with no success whatsoever. I've had this loan on my back for 20 years. Walden's promises are fraudulent.

hateful  Send email

Dec 24, 2015

PhD holdup Walden University

Working on PhD for years, kept having to rewrite, get approval, then told to rewrite what was all ready approved a few versions back. Finally, after a year with one advisor and approval, I was told by a new member I would have to start over again because it wasn't a PhD type of study. Now, I'm continuing the process and \$250,000 in debt which I will never get back in promotions, etc.

They say it costs \$43,000 to get the PhD which is a lie. It also takes a long time to get 4 residencies and all of the credits needed THEN years more for the rest of it.

Nightmarish. Was a great school until the PhD itself began, then horrible and a rip off. Biggest mistake of my life, time and money lost with no gain. Need to finish it now, I'm stuck and cannot transfer and have to just play the waiting game registering for one 6 credit class each semester until I'm done. (6 credits is a lot of money)

Hope this helps someone.

Jimmy

rpb250  Send email

Nov 30, 2015

I want to join Walden class action lawsuit

I would like to join this class action suit against Walden University. I have experienced the same issues. I started the DBA program in 2012 and was told it would take 2-3 years to complete due to credits received from the MBA program. The guidelines and requirements changed so many times that I have had to start over again and again. January 2015, after my chair resigned, I had to start over yet again. Now, my student loans have maxed out and I have no more money to complete the degree. I am 100K in debt, with nothing to show for it. I feel like I have wasted 3 years. I complained to the director of our program, and her solution was for me to pay to attend ANOTHER DBA Intensive and really focus on writing. What kind of answer is that? She did not speak to or address any of the issues I raised: continuous changes, wasted tuition dollars, inability to make progress through the program, inconsistencies in expectations. We are still working on the proposal 3 years later. I should be finished by now. I was misled. I am very unhappy with the results of the DBA program.

hokieskb  Send email

Nov 6, 2015

Same Story

My story matches the others on this page. I completed the coursework for my Ed.D. with a 4.0 gpa. I spent approximately 7 years trying to get my dissertation completed and was simply spinning my wheels. During that time I had 3 different Committee Chairs, 2 different 2nd committee members and 2 different URR Committee members. Ever change in member brought on more and more changes in the dissertation. I finally ran out of money and had to stop. I made the comment to my last Committee Chair several times that it seemed as if Walden was simply trying to keep me in their program so they could continue collecting tuition. It is so sad to me that a institution can get away with this the way they have. Everyone's story is exactly the same. I definitely would like to be part of a class action suit against them!

bikerbabe1  Send email

Sep 24, 2015

Walden is all about money

I, too, am a Ph.D. in candidate. I, too, have completed all course work. I have been working on my proposal for at least five years and have had two committee chairs. I discovered that my last chair had not even been reading my proposal. I had to hire a private coach to assist me with my proposal. I am over \$70,000 in student loans. My student loans are at their limit so we have had to take money out of our house to finance this term. I have a call into the attorneys as well. I do hope they call me soon.

jabralyn3  Send email

Sep 12, 2015

6 Figures in Debt Thanks to Walden University

I enrolled in the Ed.D program at Walden University in 2009. Here it is, 2015 and I still do not have my Ed.D. I had advanced to the URR stage of my dissertation. During one submission, I was told that adequate progress was being made. During another submission, many negative comments were made to my proposal draft. Seemingly, this process went back and forth forever. When I finally reached the URR stage of my dissertation, would you believe there were over 100 negative comments made after it was supposedly reviewed by my primary Chair? I have the documentation to support this accusation. There's so much more to report. I was told by Walden's Financial Department that I had exhausted all of my funds causing me to opt out of the Ed.D program. Therefore, considering the small amount of financial aid I had left, it was suggested that I attend the Capstone course to obtain an Ed.S from Walden University. I exhausted so much TIME and MONEY on an Ed.D that I may not ever get the opportunity to receive. I am 6 figures in debt thanks to Walden University. Can you imagine how long it would take me to payoff a student loan of this caliber? I feel that I am a victim of an educational fraud. I'm interested in joining other past and present colleagues of Walden University in the event there's a Class Action Law Suit against Walden University. mclaurinann@gmail.com 9/12/2015

Unhappy Walden Customer  Send email

Jun 14, 2015

Fraud at its finest

This "school" is the most unethical, predatory online business in existence today. I was informed that my doctoral program would take on average between 3-4 years to complete barring any unforeseen life emergencies and would cost approximately \$45,000. Six years of continual enrollment and almost \$250,000.00 of student debt later, I am still stuck in the never ending, perpetual cycle of dissertation classes. The feedback is non-existent for these "courses" and the instructor doesn't even bother to check in to the class anymore. The discussion forums, questions for instructor, etc. are literally bare with the exception of student complaints and questions regarding feedback for dissertation drafts submitted months ago. Proactive attempts to reach out to advisors, department chairs, etc. will typically receive no response or they are forwarded with no resolve. Enrolling in Walden was unquestionably the WORST mistake that I have ever made. I am currently shopping legal counsel. THE FRAUD MUST STOP!

156. Walden cannot claim it is unaware of these complaints. Besides responding to student concerns on websites such as the Better Business Bureau (see, e.g., April 6, 2015 BBB page concerning “rumored ‘common’ practice of Walden to delay Doctoral Students,” with Walden response of, “Walden strongly denies that there is any ‘common practice’ or any practice at all to delay doctoral students.”), it also responded to some of the above complaints in the Complaint Board forum.

Walden University  [Send email](#)

Sep 7, 2016

Contact Walden University

At Walden University, we take the concerns and experiences of our students very seriously, and wish to hear from you if your experience did not meet your expectations, so that we can work with you to try to resolve your concerns. If you would like to discuss your specific situation, we are here to help you. If you are a current student, or attended Walden within the past year, please contact studentaffairs@waldenu.edu and provide us with your name, student ID, program of study, location, and specific details of your situation, and one of our school managers will contact you.

If you are a former Walden University student who last attended Walden more than one year ago, please contact formerWUstudent@waldenu.edu and provide us with your name, student ID, program of study, dates of enrollment, location, and specific details of your situation, and a Walden representative will contact you.

Thank you.

PROMISES AND MISREPRESENTATIONS MADE BY WALDEN TO ITS STUDENTS

157. Walden has made and broken many promises to its students as detailed above.
158. The Walden Student Handbook indicates that after coursework is completed, the dissertation process can be completed in 13 months.
159. Walden's website and recruiters have also promised many different timelines to completion, including the commonly promised three years, as well as a promise it would take only 18 months to complete the dissertation process.
160. Given that Walden upon information and belief has below a 10% completion rate of its doctoral student population, the fact that Walden is quoting *any* "normal time to completion" is fraudulent.
161. Walden and Laureate's statements on their websites concerning the timelines for Walden's doctoral programs were false.
162. For example, Walden's statement in 2012 that there was a 68.5% "On-time completion rate" for students in the Doctor of Philosophy in Management program for students who graduated between July 1, 2009 through June 30, 2010, was false and misleading.

163. Additionally, Walden's statement in 2013 that there was a 49.3% "On-time completion rate" for students in the Doctor of Philosophy in Management program for students who graduated between July 1, 2011 through June 30, 2012, was false and misleading.

164. In general, Walden's statements about its doctoral programs "On-time completion rates" were false and misleading.

165. Walden also made many promises to its students through its Student Handbooks.

166. Walden promised that its faculty would be accessible to its students. Under a section entitled "Faculty Members' Accessibility," the Handbook states:

Walden expects faculty members to be reasonably accessible to students. The expectation of reasonable accessibility does not mean 24/7 access of faculty members to students. However, it does mean that students receive quality feedback on course submissions within a reasonable time frame

Ex. S, 2010-2011 Handbook at 130; Ex. R, 2013-2014 Handbook at 221.

167. The Student Handbook also promises timelines for "Faculty Members' Feedback."

Faculty members are to return graded classroom assignments that are submitted by the due date to students within 10 calendar days of the assignments' due dates for coursework in classrooms, and within 14 calendar days of the due date for manuscript drafts (including KAMs, theses, doctoral studies, and dissertations) in research forums. Faculty members are to provide a grade and also written, formative feedback on assignments. Assignments that are submitted late may be graded with feedback in the time frame of the instructor. Late assignments may receive minimal feedback other than the grade. The instructor is expected to give priority to assignments submitted on time.

Id.

168. This promise was broken in that many doctoral students experienced delays beyond the promised 14 days, which led to increased tuition costs of the students.

169. Further, the Handbook provides that "Faculty members are expected to be available to students outside the course discussion areas and in addition to providing substantive feedback on assignments and discussion posts." *Id.*

170. This promise was broken to Plaintiff Thornhill and the members of the Class in that substantive feedback was denied on many occasions. For example, once the MyDR system was implemented, doctoral students were denied anything more than the most general input until they completed the Proposal/first three chapters of the dissertation, when doctoral students required detailed input on how the Proposal should be prepared (especially for Chapter 3, the methodology of the dissertation). The denial of feedback caused delays for the students, if not an ultimate roadblock, again resulting in additional tuition for Walden.

171. The Handbook further promises that if a faculty member suddenly departs, Walden will restore faculty services to the students.

Unexpected interruptions: Faculty services may be unexpectedly interrupted because of an instructor's death or prolonged ill health, or because of an instructor's discontinuation of association with the university. In such cases, **the student's associate dean/executive director, or designee, ensures that faculty services are restored to all affected students.** The associate dean/executive director or designee communicates with affected students throughout the restoration process until appropriate assignments are finalized.

Ex. S, Excerpts, 2010-2011 Handbook at 123 (emphasis added); Ex. R, Excerpts 2013-2014 Handbook at 214-215.

172. This promise was repeatedly broken, in that once instructors left, Walden left it to the students to find replacements for their dissertation advisors...which would sometimes take months in which they were still paying tuition to Walden.

173. The Handbook also describes Doctoral Committee Member Roles.

Faculty members in Walden University doctoral programs who accept the duty of serving on a dissertation or doctoral study committee assume a dual responsibility of high importance. One part is service to their students; the other is service to the academic practice, discipline, and professional field to which the dissertation is related. For the first part, expectations concerning the faculty service to be performed are determined by students' needs, and by university academic policy pertaining to how these needs are to be addressed. For the second, expectations are set both by university academic policy and by policies and practice that frame acceptable work in the discipline and professional field at large.

Ex. S at 174; Ex. R at 258. Further, “Walden intends that dissertation/doctoral study committee members work as a team, directly guiding students through the proposal, research and analysis, and ultimately the final oral presentation.” Ex. S at 174; Ex. R at 259.

174. As explained above, this is not how Walden worked. Instead, the MyDR application placed a wall between students and their advisers prior to completion of the Proposal.

CLASS ACTION ALLEGATIONS

175. The experiences of Plaintiff at Walden were similar to those experienced by numerous other students attempting to navigate the dissertation process across all of Walden’s PhD disciplines.

176. Plaintiff requests the Court certify this lawsuit as a class action pursuant to Rule 23 of the Federal Rules of Civil Procedure.

177. In the first instance, Plaintiff seeks certification of a nationwide Class under Maryland law, including certification of claims for fraud in the inducement (First Cause of Action), breach of contract (Second Cause of Action) and violations of the Maryland Consumer Protection Act (Third Cause of Action) and unjust enrichment (Fourth Cause of Action). Thus, Plaintiff seeks to certify the following nationwide Class pursuant to Rule 23:

All current or former students of Walden University who enrolled in and paid for a doctoral degree dissertation course at Walden University (“Class”).

178. In the alternative, should the Court decide not to certify a nationwide class under Maryland law, Plaintiff Thornhill seeks certification of state classes for each additional Plaintiff according to their state of residency, including certification of claims for fraud in the inducement under Ohio law (Fifth Cause of Action), breach of contract under Ohio law (Sixth Cause of Action), unjust enrichment under Ohio law (Seventh Cause of Action), and Ohio Consumer

Protection Act (Eighth Cause of Action). Thus, in the alternative, Plaintiff Thornhill seeks to certify the following Ohio Sub-Class pursuant to Rule 23:

All current or former students of Walden University who enrolled in and paid for a doctoral degree dissertation course at Walden University while residing in Ohio (“Ohio Sub-Class”).

179. Numerosity: Upon information and belief, the members of the Class number in at least the thousands. As a result, the Class is so numerous that joinder of all members in a single action is impracticable. The members of the Class should be readily identifiable from academic records and enrollment records of Walden. The disposition of these claims will provide substantial benefits to the Class.

180. Commonality and Predominance: There is a well-defined community of interest and common questions of law and fact which predominate over any questions affecting only individual members of the Class. These common legal and factual questions, which will generate common answers which are apt to drive the resolution of the litigation, do not vary between members of the Class. These common questions may be determined without reference to individual circumstances and will provide common answers. The following represent a non exhaustive list of common questions:

- a. Whether Walden maintains institutional control over its doctoral programs;
- b. Whether, with knowledge of its abysmally low PhD completion rate, Walden promised potential and current students unrealistic timelines to completion of its PhD program;
- c. Whether, with knowledge of Walden’s low PhD completion rate and timeline for completion of its PhD programs, Laureate promised potential and current students unrealistic timelines to completion of its PhD program;
- d. Whether, with knowledge of its abysmally low PhD completion rate, Walden made false representations to its students about their actual chances of even completing a PhD program at Walden;

e. Whether Walden and Laureate constructed and implemented a system which caused the dissertation process to last longer than represented so that Walden could generate additional revenue through tuition payments (thereby also generating additional profits for Laureate);

e. Whether Walden and Laureate have been unjustly enriched by their conduct at the expense of the Class;

f. Whether Walden breached its contracts with the Class;

g. Whether Walden and Laureate violated consumer protection statutes by virtue of their conduct toward the Class; and

h. Whether, as a result of Walden and Laureate's conduct, Plaintiff and the Class are entitled to damages, restitution, equitable relief and/or other relief, and, if so, the amount and nature of such relief.

181. **Typicality:** The representative Plaintiff's claims are typical of the claims of the Class.

Plaintiff and all members of the Class were injured by the same wrongful practices in which Walden has engaged. Further, the Plaintiff and members of the Class seek relief based on the same legal theories. There may be differences in the amount of damages sustained by each member of the Class; however, Class-wide and individual damages can be determined readily. Individual damages issues will not bar Class certification.

182. **Adequacy of Representation:** Plaintiff will fairly and adequately protect and pursue the interests of the Class. Plaintiff understands the nature of the claims herein, their role in the proceedings, and have and will vigorously represent the Class. Plaintiff has retained Class counsel who are experienced in and qualified in prosecution of consumer protection class actions and other forms of complex litigation. Neither Plaintiff, nor her attorneys, have interests which are contrary to or conflict with those of the Class.

183. **Superiority and Manageability:** A class action is superior to all other available methods of adjudication of this lawsuit. Because individual litigation of the claims of Class members is economically infeasible and judicially impracticable, the class action device is the only way to

facilitate adjudication of Plaintiff's and the Class' claims. Although the aggregate damages sustained by the Class are in the millions of dollars, the individual damages incurred by each member resulting from Walden's wrongful conduct are not significant enough for experienced counsel to handle on an individual basis. Further, due to the conduct of Walden, Plaintiff and members of the Class have significant debt burdens from their time at Walden and cannot afford to hire counsel to pursue their claims on an hourly-fee basis. Even assuming individual Class members could afford it, the likelihood of individual claims being pursued by the Class members is remote. Even then, the burden on the judicial system would be unjustifiable in light of the class action device. Individual members of the Class do not have significant interest in individually controlling the prosecution of separate actions and individualized litigation could result in varying, inconsistent or contradictory judgments. Plaintiff knows of no reason that this litigation should not proceed as a class action.

184. The nature of notice to the Class is contemplated to be by direct mail upon certification of the Class or, if such notice is not practicable, by best notice possible under the circumstances including, inter alia, email, publication in major newspapers, and maintenance of a website.

TOLLING AND ESTOPPEL

185. Plaintiff's causes of action did not arise until Plaintiff discovered, or by the exercise of reasonable diligence should have discovered, that they were injured by Walden and Laureate's intentional and deliberate scheme. Plaintiff did not and could not have discovered the intentional scheme through reasonable diligence.

186. The applicable statutes of limitations have been tolled by Walden and Laureate's knowing and active concealment of the material facts regarding its scheme to intentionally prolong the dissertation and theses process. Walden and Laureate kept Plaintiff and the members

of the Class ignorant of the vital information essential to pursue their claims, without any fault or lack of diligence on the part of Plaintiff and Class members.

187. Walden and Laureate were and are under a continuous duty to disclose to Plaintiff and the members of the Class the true nature of the scheme that they have implemented to prolong the dissertation process. At all relevant times, and continuing to this day, Walden and Laureate knowingly, affirmatively, and actively misrepresented and concealed the true character, quality and nature of its scheme.

188. Based on the foregoing, Walden and Laureate are estopped from relying on any statutes of limitation in defense of this action. Walden and Laureate are also estopped from relying on any statutes of limitation in defense of this action because they failed to disclose the scheme prior to accepting each and every tuition payment in exchange for the provision of educational services.

189. Pursuant to the doctrines of Equitable Tolling, Equitable Estoppel, Fraudulent Concealment and the Discovery Rule, the period for bringing claims shall not be barred due to any statute of limitations or statute of repose. With respect to each and every cause of action asserted herein, Plaintiff expressly pleads Equitable Tolling, Equitable Estoppel, Fraudulent Concealment and the Discovery Rule and their application thereto.

190. All conditions precedent to the filing of this Complaint have been satisfied. This action has been filed prior to the expiration of any applicable statute of limitations or statute of repose.

FIRST CAUSE OF ACTION
Fraud in the Inducement Against Walden and Laureate

191. Plaintiff brings this cause of action on behalf of a nationwide Class under Maryland common law.

192. Plaintiff realleges and incorporate the preceding allegations by reference as if set forth fully herein.

193. Walden and Laureate made actual or implied false representations concerning the timing and cost of a doctoral degree, while concealing the truth from prospective and actual students.

194. Walden and Laureate had a duty to disclose that Walden's doctoral programs were designed to take much longer than they represented.

195. Walden and Laureate concealed and are still concealing how long Walden's doctoral programs actually take to complete.

196. For example, at the time Plaintiff Thornhill was recruited and applied to its PhD in Management program, Walden and Laureate concealed that the program was designed to take 66 months to complete (although less than 33% of students finish in that time frame).

197. Instead, Walden intentionally misled Plaintiff Thornhill with statements that the program would actually take three years (with 13 or 18 months to complete a dissertation), and that Plaintiff would have control over how quickly she could complete the program.

198. Similar, if not identical, false representations and omissions were made to other members of the Class about their degree programs as well either via recruiters, in Walden marketing materials and on Walden and Laureate webpages.

199. Walden and Laureate also concealed the actual percentage of students who graduated with PhDs from Walden.

200. Further, Walden informed prospective students and current students they would have resources available to them, when Walden knew full well that such resources would not be available.

201. These representations were material to Plaintiff Thornhill and the members of the Class agreeing to attend Walden.

202. Walden and Laureate were aware of the falsity of their representations, or at a minimum had an utter disregard for their truthfulness. For example, they purposefully designed Walden's doctoral programs to last a certain, longer time frame, but told students it would take less time.

203. Walden and Laureate intended students to rely upon these representations because they were included in marketing materials and on their websites.

204. Plaintiff and members of the Class were justified in relying upon these representations.

205. Plaintiff and members of the class were injured by relying on these false representations and omissions because had Walden and Laureate been truthful about the timelines and costs for Walden's doctoral programs, as well as graduation rate and resources actually available, doctoral students would not have enrolled.

SECOND CAUSE OF ACTION
Breach of Contract Against Walden

206. Plaintiff realleges and incorporates the preceding allegations by reference as if set forth fully herein.

207. Plaintiff brings this cause of action on behalf of a nationwide Class under Maryland common law. Walden has systematically violated its contracts with Plaintiff and each member of the Class.

208. Plaintiff and each member of the Class contracted with Walden to obtain doctoral educational services. Implied in each and every contract was a covenant of good faith and fair dealing.

209. As part of the contract, Walden promised, inter alia, that, in connection with providing doctoral educational services: 1) dissertation/doctoral study committee members would work as

a team, directly guiding students through the various stages of the dissertation process including the proposal; 2) students had control over how long it would take to obtain their doctoral degree, 3) the dissertation process could take as little as 13 or 18 months; 4) that the “minimum” time to complete its doctoral programs would be three years and cost between \$60,000-70,000; 5) the process for obtaining a dissertation supervisory chair and member would be reasonable and not burdensome; 6) there would be reasonable stability in faculty member retention such that the process for obtaining a dissertation supervisory chair and member would not be repeated, much less repeated multiple times, and that if a faculty member left, Walden would find a suitable replacement; and 7) appropriate and timely feedback (within 14 days) would be provided to students with respect to their dissertation work.

210. Rather than provide doctoral educational services as per its contractual agreement, Walden knowingly and intentionally directed and implemented a dissertation process fraught with inefficiencies, meant to ensure that students do not receive adequate resource, the timely responses and attention that they were promised. All of this is done without honesty or transparency by Walden regarding the actual time and expense that its doctoral students will incur in an effort to complete their degrees. The policy implemented by Walden breaches its contracts with Plaintiff and the Class.

211. Plaintiff and each member of the Class provided significant value to Walden in the form of tuition payments and fees for doctoral dissertation courses as contracted.

212. Furthermore, Plaintiff and each member of the Class complied with their obligations under the contract. To the extent that they did not comply with their obligations under the contract, it was solely the result of conduct engaged in by Walden.

213. The breach of contract on the part of Walden has resulted in Walden's doctoral students enrolling in dissertation courses that would not be necessary if Walden had honored its contract and, in many instances, caused Class members to stop pursuing their education altogether.

214. Despite its knowing and intentional breaching of the contracts, Walden has retained the tuition payments made by the members of the Class.

215. Walden has breached its contracts for doctoral education services with Plaintiff and each member of the Class. Walden's breach has caused damage to Plaintiff and each member of the Class in the form of additional tuition payments for doctoral dissertation courses and, in many instances, to stop pursuing their education altogether, causing them to be damaged in the amount of tuition payments they made before being forced to stop pursuing their education.

216. Moreover, Walden has breached its contracts for doctoral educational services with Plaintiff and each member of the Class by engaging in systematic conduct whereby it has failed to honor the covenant of good faith and fair dealing implied in every contract. Walden has engaged in unreasonable conduct that was entirely inconsistent with the reasonable expectations of Plaintiff and each member of the Class. Walden's breach has caused damage to Plaintiff and each member of the Class in the form of additional tuition payments for doctor dissertation courses and, in many instances, to stop pursuing their education altogether, causing them to be damaged in the amount of tuition payments they made before being forced to stop pursuing their education.

THIRD CAUSE OF ACTION

Violations of the Maryland Consumer Protection Act Md Code, § 13-301 of the Commercial Law Article, et seq. Against Walden and Laureate

217. Plaintiff realleges and incorporates the preceding allegations by reference as if set forth fully herein.

218. Plaintiff brings this cause of action on behalf of a nationwide Class. Walden and Laureate have engaged in unfair, unlawful, and fraudulent business practices, as set forth above.

219. Md. Code, § 13-303(3) of the Commercial Law Article (“C.L.”), specifically prohibits the use of unfair or deceptive trade practices in the “offer for sale of course credit or other educational services.”

220. By engaging in the above-described acts and practices, Walden and Laureate have committed one or more acts of unfair and deceptive trade practices as those terms are defined in C.L. § 13-301.

221. Walden and Laureate made false and misleading statements about the nature, quality, length, and cost of Walden’s doctoral education services. Specifically, Walden and/or Laureate misrepresented that: 1) dissertation/doctoral study committee members would work as a team, directly guiding students through the various stages of the dissertation process including the proposal; 2) students had control over how long it would take to obtain their doctoral degree, 3) the dissertation process could take as little as 13 or 18 months; 4) that the “minimum” time to complete its doctoral programs would be three years and cost between \$60,000-70,000; 4) the process for obtaining a dissertation supervisory chair and member would be reasonable and not burdensome; 5) there would be reasonable stability in faculty member retention such that the process for obtaining a dissertation supervisory chair and member would not be repeated, much less repeated multiple times; and 6) appropriate and timely feedback (within 14 days) would be provided to students with respect to their dissertation work.

222. Walden and Laureate also knowingly concealed, omitted and otherwise failed to state material facts about Walden’s doctoral education services that would tend to, and did, in fact, deceive students. Specifically, Walden and Laureate failed to disclose that they intentionally and

deliberately used Walden's dissertation process as a means of improperly extracting tuition and generating revenue. Walden and Laureate further failed to disclose that they knowingly directed and implemented a dissertation process that is fraught with inefficiencies, meant to ensure that students do not receive the timely responses and attention that they were promised, and creates inordinate turnover of faculty and supervisory committee chairs and members.

223. Walden and Laureate knew that the doctoral dissertation coursework was and continues to be systematically prolonged by the violations set forth herein.

224. The misrepresentations and omissions were material to Plaintiff and the members of the Class.

225. Walden and Laureate's unfair and deceptive trade practices and acts occurred and continue to occur repeatedly during the course of its business. These actions constitute unfair and deceptive trade practices, in violation of C.L. § 13-303.

226. Plaintiff and members of the Class relied on these representations and omissions in the course of pursuing their doctoral degrees. Furthermore, Walden and Laureate intended that Plaintiff and members of the Class would rely on the representations and omissions.

227. As a direct and proximate result of Walden's unfair and deceptive practices and acts, Plaintiff and the Class have suffered and will continue to suffer actual damages. Had Plaintiff and the members of the Class been aware of the misrepresentations and omissions, they would not have paid tuition to Walden for the educational services that Defendant purported to provide.

FOURTH CAUSE OF ACTION
Unjust Enrichment Against Walden and Laureate

228. Plaintiff realleges and incorporates the preceding allegations by reference as if set forth fully herein.

229. Plaintiff brings this cause of action on behalf of a nationwide Class under Maryland common law. Walden and Laureate have engaged in unjust conduct to the detriment of Plaintiff and each member of the Class.

230. Plaintiff and each member of the Class provided significant value to Walden (and to Laureate through Walden) in the form of tuition payments for doctoral dissertation courses.

231. Walden and Laureate appreciated or had knowledge of the benefit received by retaining the money paid by Plaintiff and each member of the Class.

232. Although Walden accepted the tuition payments and retained and received benefit therefrom (including delivering profits from the tuition payments to Laureate), it did not provide students with a dissertation process that was promised and contemplated in connection with the payment of the tuition. On the contrary, Walden and Laureate intentionally and deliberately used the dissertation process as means of improperly extracting tuition and generating revenue.

Walden and Laureate have intentionally and knowingly directed and implemented a dissertation process that is fraught with inefficiencies, meant to ensure that students do not receive the timely responses and attention that they were promised, and creates inordinate turnover of faculty and supervisory committee chairs and members. All of this is done without any honesty or transparency by Walden and Laureate regarding the actual time and expense that Walden's doctoral students will incur in an effort to complete their degrees.

233. This unjust conduct on the parts of Walden and Laureate that have resulted in Walden doctoral students enrolling in dissertation courses that would not be necessary if Walden and Laureate had not acted unjustly in causing Class members to incur significant, additional tuition costs. Defendants' scheme has also caused certain Class members to stop pursuing the process altogether.

234. Despite their inequitable conduct, Walden and Laureate have retained the tuition payments made by its doctoral students pursuing dissertation coursework and/or profits received from Walden.

235. As a result, Walden and Laureate have been unjustly enriched, to the detriment of Plaintiff and the members of the Class.

**FIFTH CAUSE OF ACTION (Alternative Ohio Sub-Class)
Fraud in the Inducement Against Walden and Laureate**

236. Plaintiff brings this cause of action on behalf of a nationwide Class under Maryland common law.

237. Plaintiff realleges and incorporates the preceding allegations by reference as if set forth fully herein.

238. Walden and Laureate made actual or implied false representations concerning the timing and cost of a doctoral degree, while concealing the truth from prospective and actual students.

239. Walden and Laureate had a duty to disclose that Walden's doctoral programs were designed to take much longer than they represented.

240. Walden and Laureate concealed and are still concealing how long Walden's doctoral programs actually take to complete.

241. For example, at the time Plaintiff Thornhill was recruited and applied to its PhD in Management program, Walden and Laureate concealed that the program was designed to take 66 months to complete (although less than 33% of students finish in that time frame).

242. Instead, Walden and Laureate intentionally misled Plaintiff Thornhill with statements that the program would actually take three years (with 13 or 18 months to complete a dissertation), and that Plaintiff would have control over how quickly she could complete the program.

243. Similar, if not identical, false representations and omissions were made to other members of the Class about their degree programs as well.

244. Walden and Laureate also concealed the actual percentage of students who graduated with PhDs from Walden.

245. Further, Walden informed prospective students and current students they would have resources available to them, when Walden knew full well that such resources would not be available.

246. These representations were material to Plaintiff Thornhill and the members of the Class agreeing to attend Walden.

247. Walden and Laureate were aware of the falsity of their representations, or at a minimum had an utter disregard for their truthfulness. For example, they purposefully designed Walden's doctoral programs to last a certain, longer time frame, but told students they would take less time.

248. Walden and Laureate intended students to rely upon these representations because they were included in marketing materials and on their websites.

249. Plaintiff and members of the Class was justified in relying upon these representations.

250. Plaintiff and members of the class were injured by relying on these false representations and omissions because had Walden and Laureate been truthful about the timelines and costs for Walden's doctoral programs, as well as graduation rate and resources actually available, doctoral students would not have enrolled.

**SIXTH CAUSE OF ACTION (Alternative Ohio Sub-Class)
Breach of Contract Against Walden**

251. Plaintiff realleges and incorporates the preceding allegations by reference as if set forth fully herein.

252. Plaintiff Thornhill brings this cause of action, in the alternative, on behalf of an Ohio Sub-Class under Ohio common law. Walden has systematically violated its contracts with Plaintiff Thornhill and each member of the Ohio Sub-Class.

253. Plaintiff Thornhill and each member of the Ohio Sub-Class contracted with Walden to obtain doctoral educational services. Implied in each and every contract was a covenant of good faith and fair dealing.

254. As part of the contract, Walden promised, inter alia, that, in connection with providing doctoral educational services: 1) the process for obtaining a dissertation supervisory chair and member would be reasonable and not burdensome; 2) there would be reasonable stability in faculty member retention such that the process for obtaining a dissertation supervisory chair and member would not be repeated, much less repeated multiple times; and 3) appropriate and timely feedback (within 14 days) would be provided to students with respect to their dissertation work.

255. As part of the contract, Walden promised, inter alia, that, in connection with providing doctoral educational services: 1) dissertation/doctoral study committee members would work as a team, directly guiding students through the various stages of the dissertation process including the proposal; 2) students had control over how long it would take to obtain their doctoral degree, 3) the dissertation process could take as little as 13 or 18 months; 4) that the “minimum” time to complete its doctoral programs would be three years and cost between \$60,000-70,000; 5) the process for obtaining a dissertation supervisory chair and member would be reasonable and not burdensome; 6) there would be reasonable stability in faculty member retention such that the process for obtaining a dissertation supervisory chair and member would not be repeated, much less repeated multiple times, and that if a faculty member left, Walden would find a suitable

replacement; and 7) appropriate and timely feedback (within 14 days) would be provided to students with respect to their dissertation work.

256. Rather than provide doctoral educational services as per its contractual agreement, Walden knowingly and intentionally directed and implemented a dissertation process fraught with inefficiencies, meant to ensure that students do not receive adequate resource, the timely responses and attention that they were promised. All of this is done without honesty or transparency by Walden regarding the actual time and expense that its doctoral students will incur in an effort to complete their degrees. The policy implemented by Walden breaches its contracts with Plaintiff and the Ohio Sub-Class.

257. Plaintiff and each member of the Ohio Sub-Class provided significant value to Walden in the form of tuition payments and fees for doctoral dissertation courses as contracted.

258. Furthermore, Plaintiff and each member of the Ohio Sub-Class complied with their obligations under the contract. To the extent that they did not comply with their obligations under the contract, it was solely the result of conduct engaged in by Walden.

259. The breach of contract on the part of Walden has resulted in Walden's doctoral students enrolling in dissertation courses that would not be necessary if Walden had honored its contract and, in many instances, caused Ohio Sub-Class members to stop pursuing their education altogether.

260. Despite its knowing and intentional breaching of the contracts, Walden has retained the tuition payments made by the members of the Ohio Sub-Class.

261. Walden has breached its contracts for doctoral education services with Plaintiff and each member of the Ohio Sub-Class. Walden's breach has caused damage to Plaintiff and each member of the Ohio Sub-Class in the form of additional tuition payments for doctoral

dissertation courses and, in many instances, to stop pursuing their education altogether, causing them to be damaged in the amount of tuition payments they made before being forced to stop pursuing their education.

262. Moreover, Walden has breached its contracts for doctoral educational services with Plaintiff and each member of the Ohio Sub-Class by engaging in systematic conduct whereby it has failed to honor the covenant of good faith and fair dealing implied in every contract. Walden has engaged in unreasonable conduct that was entirely inconsistent with the reasonable expectations of Plaintiff and each member of the Ohio Sub-Class. Walden's breach has caused damage to Plaintiff and each member of the Ohio Sub-Class in the form of additional tuition payments for doctor dissertation courses and, in many instances, to stop pursuing their education altogether, causing them to be damaged in the amount of tuition payments they made before being forced to stop pursuing their education.

**SEVENTH CAUSE OF ACTION (Alternative Ohio Sub-Class)
Unjust Enrichment Against Walden and Laureate**

263. Plaintiff realleges and incorporate the preceding allegations by reference as if set forth fully herein.

264. Plaintiff Thornhill brings this cause of action, in the alternative, on behalf of an Ohio Sub-Class under Ohio common law. Walden and Laureate have engaged in unjust conduct, to the detriment of Plaintiff Thornhill and each member of the Ohio Sub-Class.

265. Plaintiff and each member of the Ohio Sub-Class provided significant value to Walden in the form of tuition payments for doctoral dissertation courses (and to Laureate in the form of profits from Walden).

266. Walden and Laureate appreciated or had knowledge of the benefit received by retaining the money paid by Plaintiff and each member of the Ohio Sub-Class.

267. Although Walden accepted the tuition payments and retained and received benefit therefrom (as did Laureate with profits received from Walden), they did not provide students with a doctoral process that was promised and contemplated in connection with the payment of the tuition. On the contrary, Walden and Laureate intentionally and deliberately used the dissertation process as a means of improperly extracting tuition and generating revenue. Walden and Laureate have intentionally and knowingly directed and implemented a dissertation process that is fraught with inefficiencies, meant to ensure that students do not receive the timely responses and attention that they were promised, and creates inordinate turnover of faculty and supervisory committee chairs and members. All of this is done without any honesty or transparency by Walden and Laureate regarding the actual time and expense that Walden's doctoral students will incur in an effort to complete their degrees.

268. This unjust conduct on the part of Walden and Laureate have resulted in Walden doctoral students enrolling in dissertation courses that would not be necessary if Walden and Laureate had not acted unjustly and in incurring significant additional tuition costs. It has also caused certain Ohio Sub-Class members to stop pursuing the process altogether.

269. Despite their inequitable conduct, Walden and Laureate have retained the tuition payments made by Walden doctoral students pursuing dissertation coursework and the profits therefrom.

270. As a result, Walden and Laureate have been unjustly enriched, to the detriment of Plaintiff Thornhill and the members of the Ohio Sub-Class.

**EIGHTH CAUSE OF ACTION (Alternative Ohio Sub-Class)
Violation of Ohio Revised Code §1345.02 (Ohio Consumer Protection Act)
Against Walden and Laureate**

271. Plaintiff realleges and incorporate the preceding allegations by reference as if set forth fully herein.

272. Plaintiff brings this cause of action on behalf of an Ohio Sub-Class. Walden and Laureate have engaged in unfair, unlawful, and fraudulent business practices, as set forth above.

273. Ohio Revised Code (“ORC”) §1345.02 specifically prohibits the use of unfair or deceptive trade practices in connection with a consumer transaction.

274. By engaging in the above-described acts and practices, Walden and Laureate have committed one or more acts of unfair and deceptive trade practices as those terms are defined in §1345.02.

275. Walden and Laureate made false and misleading statements about the nature, quality, style and model of Walden’s doctoral education services. Further, the subject of the Walden PhD transaction had been supplied in accordance with previous representations made by Walden and/or Laureate to Plaintiff Thornhill and members of the Ohio Sub-Class, and those representations were not performed. Specifically, Walden and/or Laureate misrepresented that: 1) dissertation/doctoral study committee members would work as a team, directly guiding students through the various stages of the dissertation process including the proposal; 2) students had control over how long it would take to obtain their doctoral degree, 3) the dissertation process could take as little as 13 or 18 months; 4) the “minimum” time to complete its doctoral programs would be three years and cost between \$60,000-70,000; 4) the process for obtaining a dissertation supervisory chair and member would be reasonable and not burdensome; 5) there would be reasonable stability in faculty member retention such that the process for obtaining a dissertation supervisory chair and member would not be repeated, much less repeated multiple

times; and 6) appropriate and timely feedback (within 14 days) would be provided to students with respect to their dissertation work.

276. Walden and Laureate also knowingly concealed, omitted and otherwise failed to state material facts about Walden's doctoral education services that would tend to, and did, in fact, deceive students. Specifically, Walden and Laureate failed to disclose that they intentionally and deliberately used Walden's dissertation process as a means of improperly extracting tuition and generating revenue. Walden and Laureate further failed to disclose that they knowingly directed and implemented a dissertation process that is fraught with inefficiencies, meant to ensure that students do not receive the timely responses and attention that they were promised, and creates inordinate turnover of faculty and supervisory committee chairs and members.

277. Walden and Laureate knew that the doctoral dissertation coursework was and continues to be systematically prolonged by the violations set forth herein.

278. The misrepresentations and omissions were material to Plaintiff and the members of the Class.

279. Walden and Laureate's unfair and deceptive trade practices and acts occurred and continue to occur repeatedly during the course of its business. These actions constitute unfair and deceptive trade practices, in violation of ORC §1345.02.

280. Plaintiff and members of the Class relied on these representations and omissions in the course of pursuing their doctoral degrees. Furthermore, Walden and Laureate intended that Plaintiff and members of the Class would rely on the representations and omissions.

281. As a direct and proximate result of Walden's unfair and deceptive practices and acts, Plaintiff and the Class have suffered and will continue to suffer actual damages. Had Plaintiff

and the members of the Class been aware of the misrepresentations and omissions, they would not have paid tuition to Walden for the educational services that Defendant purported to provide.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff and members of the Class request that the Court enter an Order or judgment against Walden as follows:

- A. Certifying this case as a class action and appointing Plaintiff and their counsel to represent the Class;
- B. Awarding Plaintiff and other members of the Class damages and all other relief available under the claims alleged;
- C. Awarding Plaintiff and other members of the Class pre-judgment and post judgment interest as a result of the wrongs complained of herein;
- D. Awarding Plaintiff and other members of the Class their costs and expenses in this litigation, including reasonable attorneys' fees and other costs of litigation;
- E. Requiring Walden to disgorge the revenue earned through the excessive doctoral dissertation coursework;
- F. Enjoining Walden from engaging in the conduct described herein;
- G. Awarding Plaintiff and other members of the Class restitution; and
- H. Awarding such other relief as the Court deems just and proper.

JURY DEMAND

Plaintiff demands a trial by jury on all issues so triable.

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EXHIBIT A

Walden University

Introduction

Like many for-profit education companies, Walden LLC has experienced steady growth in student enrollment, Federal funds collected, and profit realized in recent years. However, the company's performance, measured by student withdrawal and default rates, is perhaps the best of any company examined, and it appears that students are faring well at this predominantly graduate degree-based for-profit college.

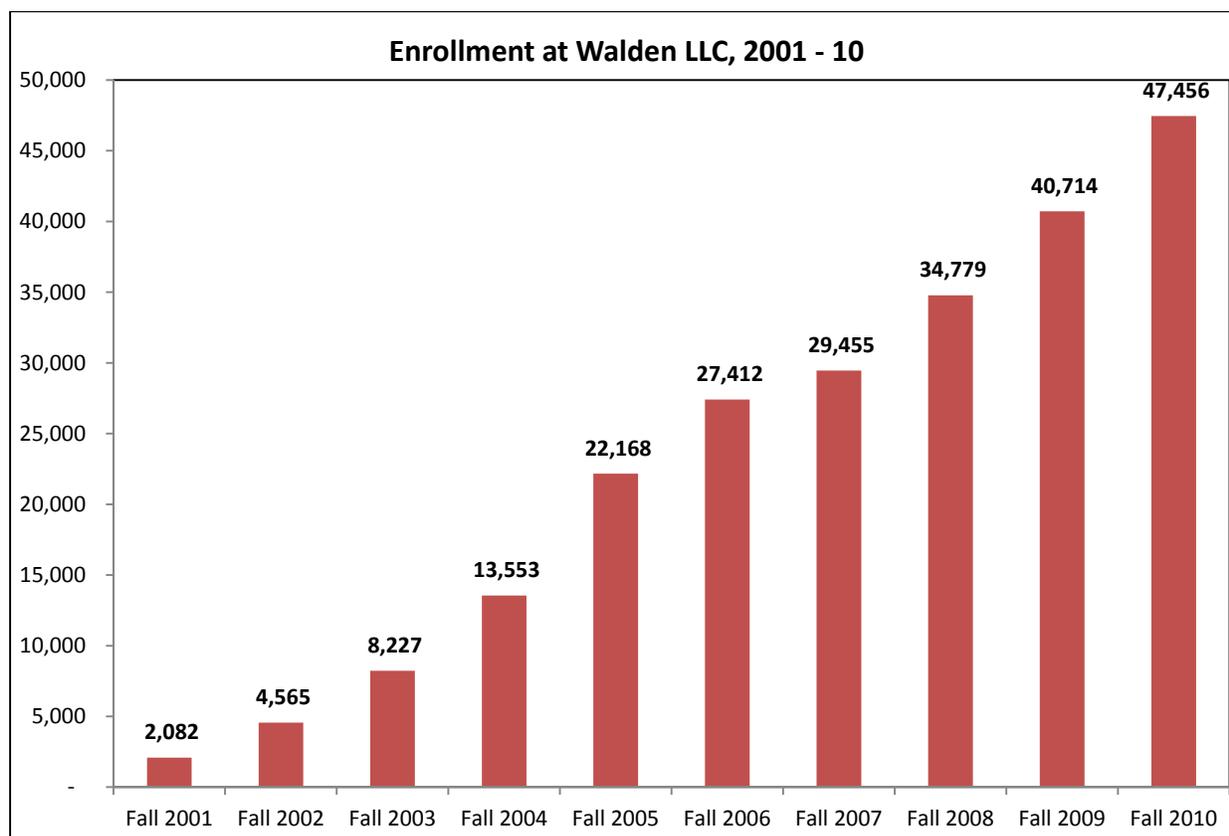
Company Overview

Walden LLC ("Walden") is a privately held, for-profit education company headquartered in Minneapolis, MN. Founded in Florida in 1970 by Bernie and Rita Turner, Walden originally awarded Doctoral degrees in school administration. After being licensed by Minnesota in 1979, Walden moved its headquarters to Minneapolis, and in 1995 began offering an online Master's program in education. In 2002, Baltimore, MD based Sylvan Learning Systems, Inc. gained a controlling interest in Walden, and in 2004, Sylvan Learning Systems became Laureate Education, Inc. In 2007, Laureate Education, Inc. was purchased by a consortium led by private equity firm KKR & Co. LP, which is currently the majority interest holder in the privately held company. Recent reports suggest that Laureate may be preparing an initial public offering.²⁹¹¹ Jonathan Kaplan is the chief executive officer of Walden University after serving as president since 2007, and Douglas Becker is the chief executive officer of Laureate Education, Inc.

The majority of Laureate's for-profit college holdings are international. Walden is the primary domestic for-profit college owned by the company. Today, Walden University operates exclusively online and offers Bachelor's degrees, as well as a variety of Master's programs in education, health and business, post-baccalaureate Certificates, and Doctoral degree programs. The vast majority of Walden University students, more than 85 percent, enroll in graduate degree programs, and the majority of those graduate students enroll in Walden's education program.

Like more than half of the regionally accredited brands the committee examined, Walden University is regionally accredited by the Higher Learning Commission of the North Central Association of Colleges and Schools (HLC). At the time HLC first accredited Walden in 1990, it enrolled 422 students.

²⁹¹¹ Olivia Oran and Soyoung Kim, "Laureate eyes IPO up to \$750 million, hires banks: sources," *Reuters*, April 9, 2012 <http://www.reuters.com/article/2012/04/09/us-laureate-ipo-idUSBRE8380VW20120409> (accessed June 22, 2012).



Walden has grown significantly over the last decade, with enrollment increasing by more than 2,000 percent since 2001.²⁹¹² Enrollment grew by more than 60 percent in the 4 years following the purchase by KKR and its private equity partners. The growth in enrollment led to growth in revenue. Revenue at Walden grew steadily, from \$190.7 million in 2006 to \$377 million in 2009.²⁹¹³

Federal Revenue

Nearly all for-profit education companies derive the majority of revenues from Federal financial aid programs. Between 2001 and 2010, the share of title IV Federal financial aid funds flowing to for-profit colleges increased from 12.2 to 24.8 percent and from \$5.4 to \$32.2 billion.²⁹¹⁴ Together, the 30

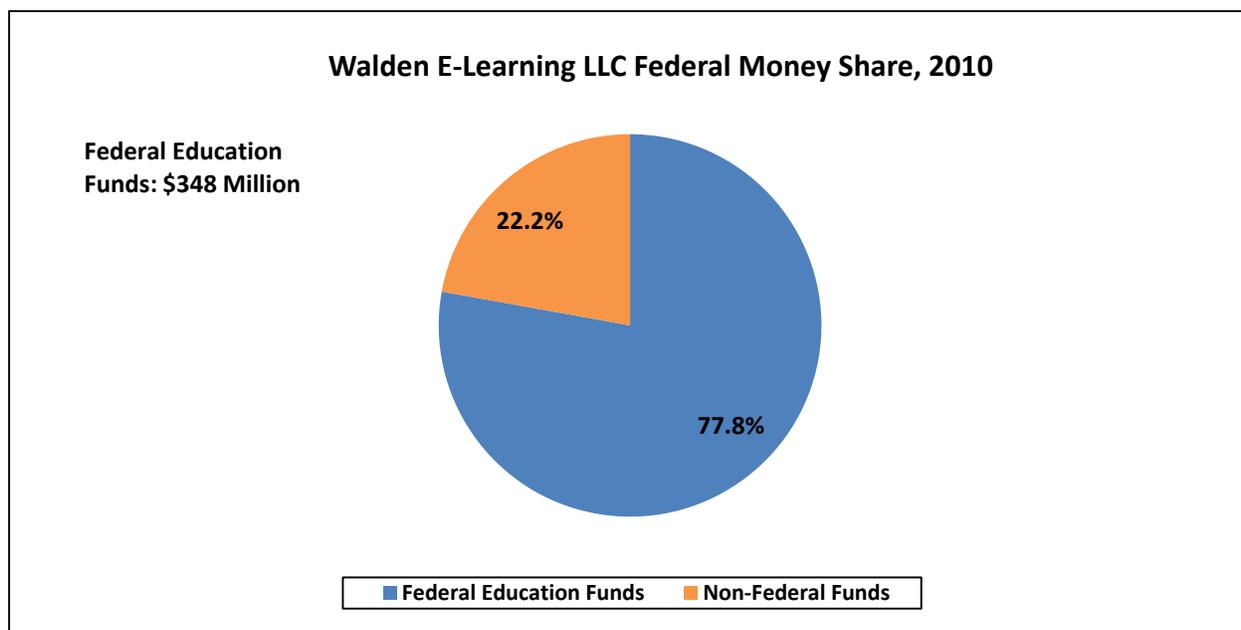
²⁹¹² Enrollment is calculated using fall enrollment for all unit identifications controlled by the company for each year from the Department of Education's Integrated Postsecondary Data System (hereinafter IPEDS). See Appendix 7. The most current enrollment data from the Department of Education measures enrollment in fall 2010. In 2011 and 2012, news accounts and SEC filings indicated that many for-profit education companies experienced a drop in new student enrollment. This also led to a decrease in revenue and profit at some companies.

²⁹¹³ Revenue figures for publicly traded companies are from Securities and Exchange Commission annual 10-K filings. Revenue figures for privately held companies are from the company financial statements produced to the committee. See Appendix 18.

²⁹¹⁴ Senate HELP Committee staff analysis of U.S. Department of Education, Federal Student Aid Data Center, *Title IV Program Volume Reports by School*, <http://federalstudentaid.ed.gov/datacenter/programmatic.html>, 2000-1 and 2009-10. Figures for 2000-1 calculated using data provided to the committee by the U.S. Department of Education. "Federal financial aid funds" as used in this report means funds made available through title IV of the Higher Education Act, including subsidized and unsubsidized Stafford loans, Pell grants, PLUS loans and multiple other small loan and grant programs. See 20 U.S.C. §1070 et seq.

companies the committee examined derived 79 percent of revenues from title IV Federal financial aid programs in 2010, up from 69 percent in 2006.²⁹¹⁵

In 2010, Walden reported 76.4 percent of revenue from Federal financial aid programs.²⁹¹⁶ However, this amount does not include revenue received from the Departments of Defense and Veterans Affairs education programs.²⁹¹⁷ Department of Defense Tuition Assistance and post-9/11 GI bill funds accounted for approximately 1.4 percent of Walden's revenue, or \$6.2 million.²⁹¹⁸ With these funds included, an estimated 77.8 percent of Walden's total revenue was comprised of Federal education funds.²⁹¹⁹



The Pell grant program, the most substantial Federal program to assist economically disadvantaged students with college costs, is a significant source of revenue for for-profit colleges. Over the past 10 years, the amount of Pell grant funds collected by for-profit colleges as a whole increased from \$1.4 billion to \$8.8 billion; the share of the total Pell program that for-profit colleges

²⁹¹⁵ Senate HELP Committee staff analysis of Proprietary School 90/10 numerator and denominator figures for each OPEID provided to the U.S. Department of Education pursuant to section 487(d)(4) of the Higher Education Act of 1965. Data for fiscal year 2006 provided to the committee by each company; data for fiscal year 2010 provided by the Department of Education on October 14, 2011. See Appendix 9.

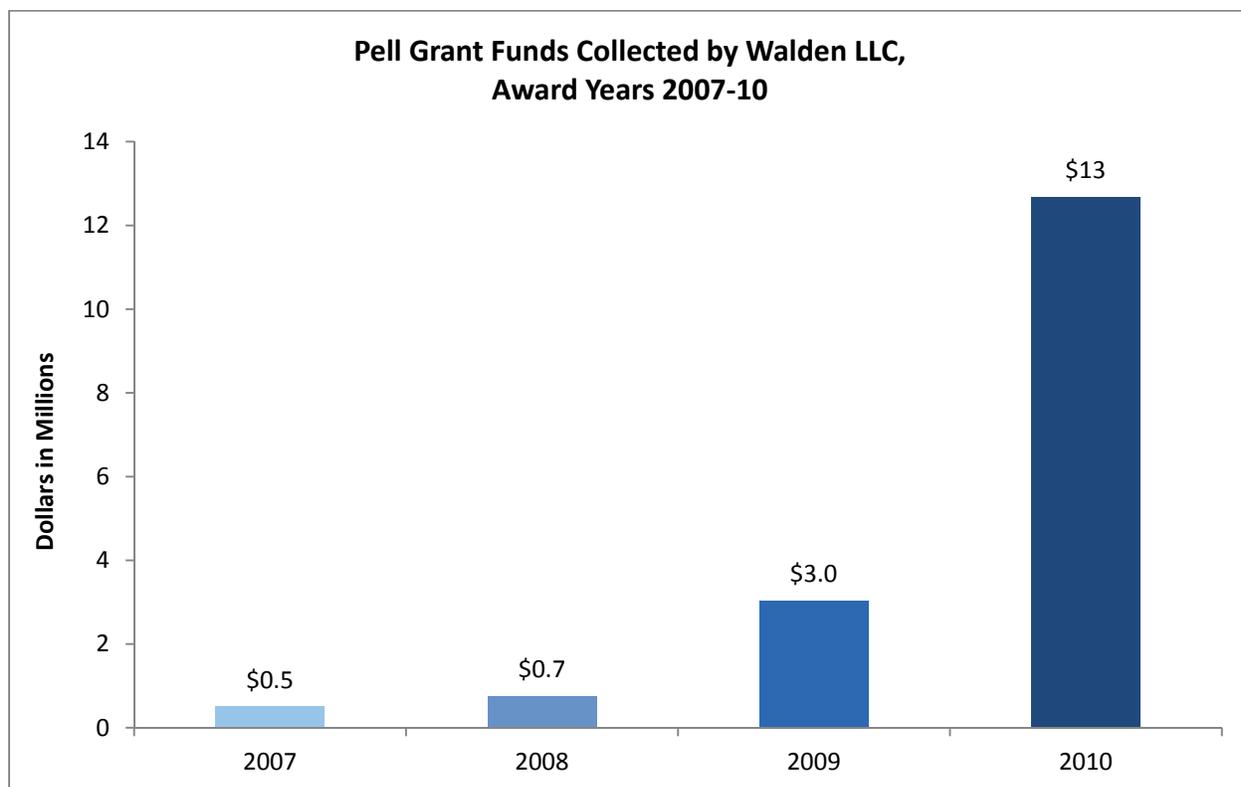
²⁹¹⁶ Id.

²⁹¹⁷ The Ensuring Continued Access to Student Loans Act (ECASLA) increased Stafford loan amounts by up to \$2,000 per student. The bill also allowed for-profit education companies to exclude the increased amounts of loan eligibility from the calculation of Federal revenues (the 90/10 calculation) during fiscal years 2009 and 2010. However, Walden officials informed committee staff that the company opted not to take advantage of the provision and did not exclude any Federal financial aid from the calculation of Federal revenues during this period.

²⁹¹⁸ Post-9/11 GI bill disbursements for August 1, 2009-July 31, 2010 provided to the committee from the Department of Veterans Affairs on November 5, 2010; post-9/11 GI bill disbursements for August 1, 2009-June 15, 2011 provided to the Committee from the Senate Committee on Veterans' Affairs via the Department of Veterans Affairs on July 18, 2011; Department of Defense Tuition Assistance Disbursements and MyCAA disbursements for fiscal years 2009-11 provided (by branch) by the Department of Defense on December 19, 2011. As explained in Appendix 11 and 12, data provided by the Department of Defense and the Department of Veterans Affairs was provided on an award year basis for both 2009-10 and 2010-11. Committee staff calculated the average monthly amount of benefits collected from DOD and VA for each company, and estimated the amount of benefits received during the company's 2010 fiscal year. See Appendix 11 and 12.

²⁹¹⁹ "Federal education funds" as used in this report means Federal financial aid funds combined with estimated Federal funds received from Department of Defense and Department of Veterans Affairs military education benefit programs.

collected increased from 14 to 25 percent.²⁹²⁰ Part of the reason for this increase is that Congress has repeatedly increased the amount of Pell grant dollars available to a student over the past 4 years, and, for the 2009-10 and 2010-11 academic years, allowed students attending year-round to receive two Pell awards in 1 year. Poor economic conditions have also played a role in increasing the number of Pell eligible students enrolling in for-profit colleges.



Walden collected \$505,712 in Pell grant funds in 2007. Just 3 years later, in 2010, the company collected \$12.7 million; while the dollar amount remains small, this is an increase of more than 2,000 percent.²⁹²¹

Spending

While Federal student aid programs are intended to support educational opportunities for students, for-profit education companies direct much of the revenue derived from these programs to marketing and recruiting new students and to profit. On average, among the 15 publicly traded education companies, 86 percent of revenue came from Federal taxpayers in fiscal year 2009.²⁹²² During

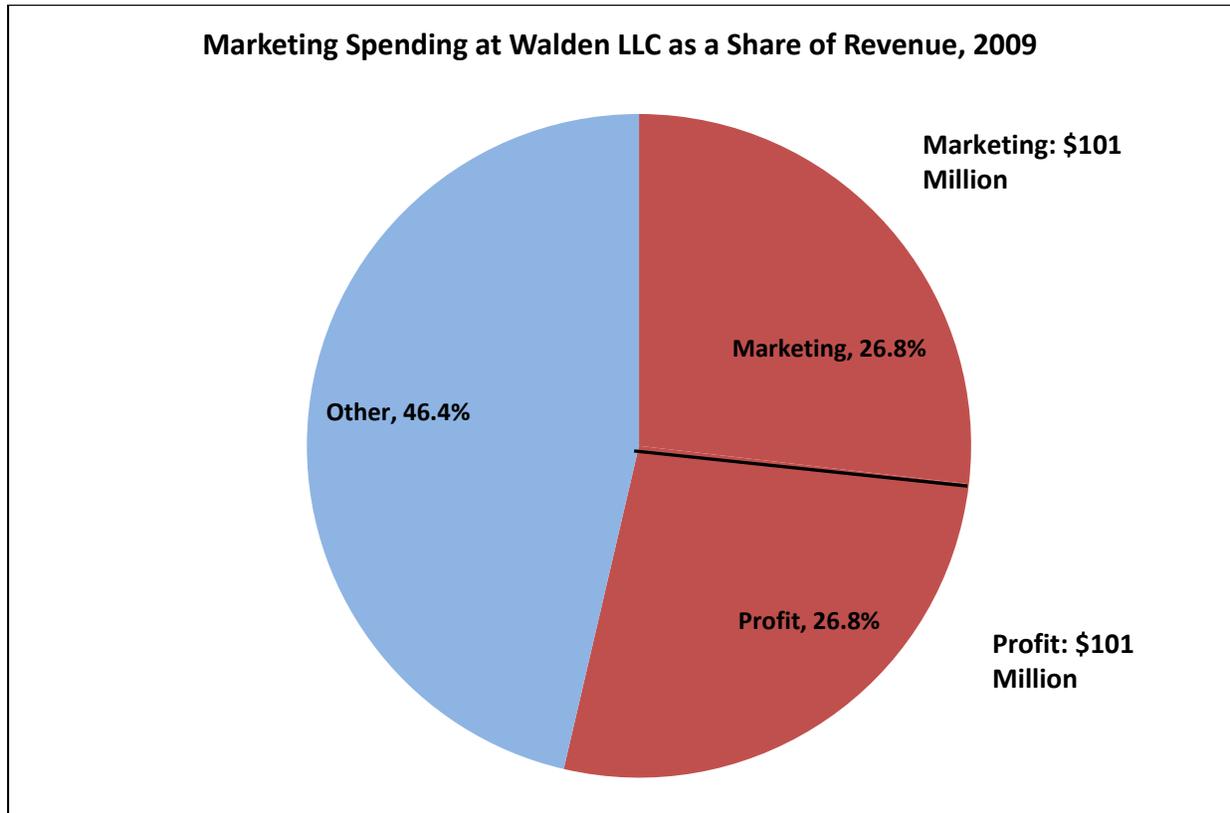
²⁹²⁰ Senate HELP Committee staff analysis of U.S. Department of Education, Federal Student Aid Data Center, *Title IV Pell Grant Program Volume Reports by School*, 2001-2 and 2010-11, <http://federalstudentaid.ed.gov/datacenter/programmatic.html>

²⁹²¹ Pell disbursements are reported according to the Department of Education's student aid "award year," other revenue figures are reported according to the company's fiscal year. Senate HELP Committee staff analysis of U.S. Department of Education, Federal Student Aid Data Center, *Title IV Pell Grant Program Volume Reports by School*, 2006-7 through 2009-10, <http://federalstudentaid.ed.gov/datacenter/programmatic.html>. See Appendix 13.

²⁹²² Senate HELP Committee staff analysis of fiscal year 2009 Proprietary School 90/10 numerator and denominator figures plus all additional Federal revenues received in fiscal year 2009 provided to the committee by each company pursuant to the committee document request of August 5, 2010.

the same period, the companies spent 23 percent of revenue on marketing and recruiting (\$3.7 billion) and 19.7 percent on profit (\$3.2 billion).²⁹²³

In 2009, Walden devoted 26.8 percent of its revenue, or \$101 million, to marketing and recruiting, and 26.8 percent, or \$101 million, to profit.²⁹²⁴ The percentage of revenue Walden allocates to both marketing and profit exceeds the for-profit sector average.²⁹²⁵ On average, the 30 for-profit schools examined spent 22.7 percent of revenue on marketing and 19.4 percent on profit.²⁹²⁶



In 2009, Walden devoted 58 percent of its total revenue, or \$202 million, to marketing, recruiting and profit.²⁹²⁷ Moreover, the amount of profit Walden generated increased rapidly, growing from \$33 million in 2006 to \$101 million in 2009, a 200 percent increase in just 3 years.²⁹²⁸

²⁹²³ Senate HELP Committee staff analysis of fiscal year 2009 financial statements and information provided to the committee by each company pursuant to the committee document request of August 5, 2010. Profit figures represent operating income before tax and other non-operating expenses including depreciation. Marketing and recruiting includes all spending on marketing, advertising, admissions and enrollment personnel as reported to the committee. See Appendix 19.

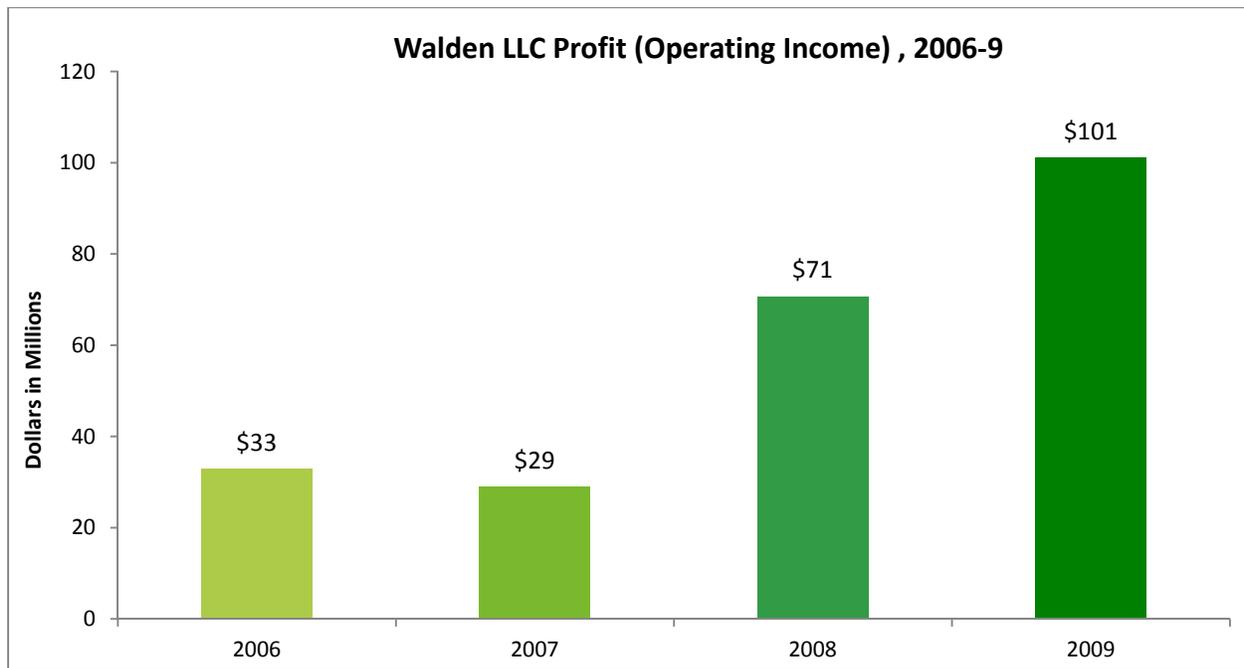
²⁹²⁴ Id.

²⁹²⁵ The higher percentage Walden spent on marketing may reflect a company decision to pursue higher quality student “leads.” Walden executives specifically note that they believe it is “more expensive to market well than not.” Letter from Walden University chief executive officer Jonathan Kaplan to committee staff, June 19, 2012.

²⁹²⁶ Senate HELP Committee staff analysis. See Appendix 19.

²⁹²⁷ Id. The “other” category includes administration, instruction, faculty salaries, executive compensation, student services, facilities, maintenance and other expenditures.

²⁹²⁸ Senate HELP Committee staff analysis. See Appendix 18. In its original response to the committee Walden noted that “It is noteworthy for the Committee that a significant reinvestment of Walden’s profits each year are made back into the university’s program development, information technology systems, infrastructure, student services and other areas that support our students and institution.”



Executive Compensation

As a privately held company, Walden is not obligated to release executive compensation figures.

Tuition and Other Academic Charges

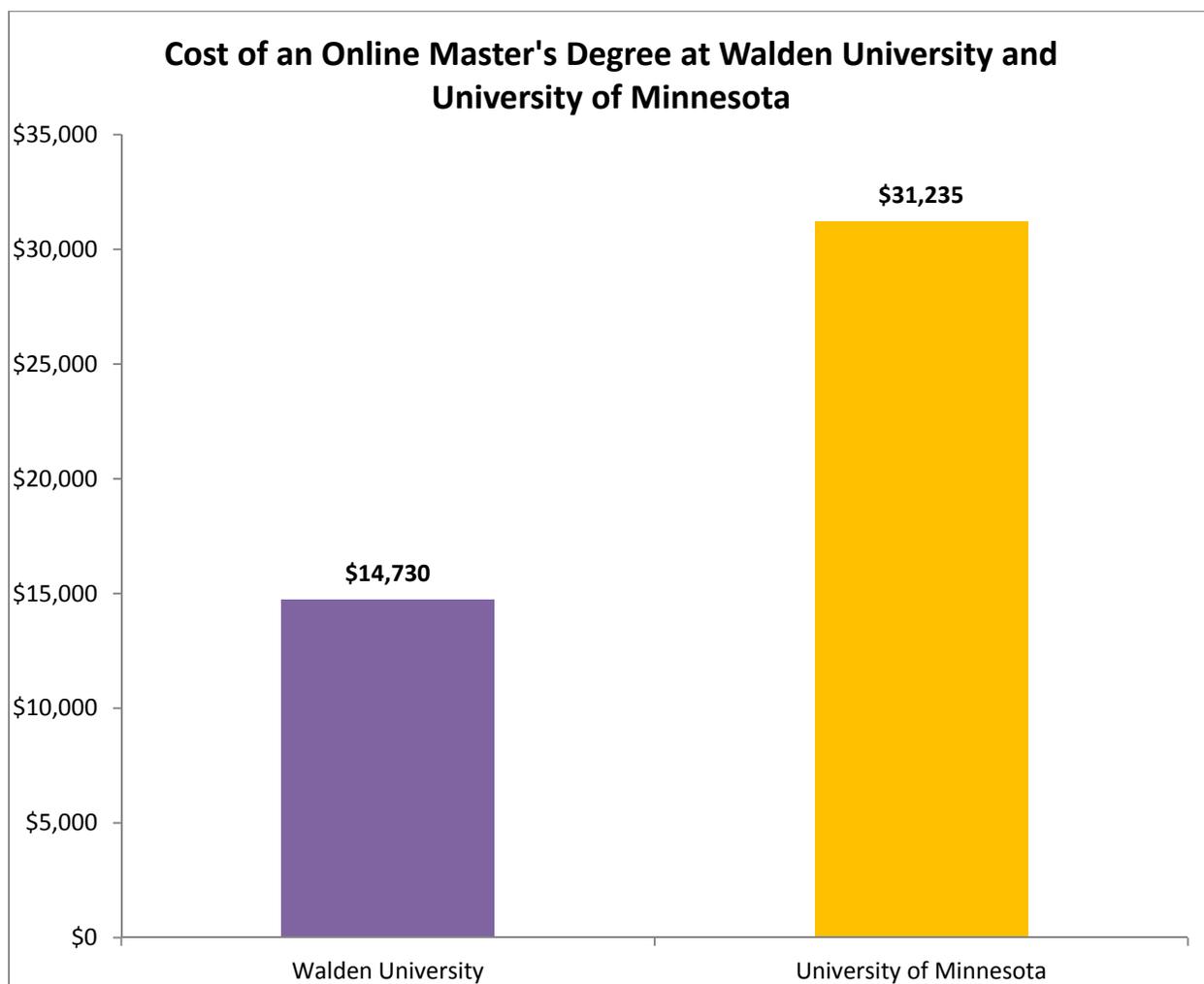
Unlike many of the for-profit colleges the committee examined, when compared to its online public and non-profit counterparts, Walden is competitively priced. A Master's in Education at Walden University costs \$14,730.²⁹²⁹ The same online degree at University of Minnesota costs \$31,235.²⁹³⁰ An online Bachelor of Science in Business Administration degree at Walden University costs \$56,800.²⁹³¹ The same degree at the University of Minnesota costs \$56,240.²⁹³²

²⁹²⁹ See Appendix 14; See also, Walden University, *Program Data*, <http://www.waldenu.edu/Degree-Programs/Masters/41574.htm> (accessed June 22, 2012). Walden offers a range of Master's degrees in the education field. In addition to an M.S. in Education, they offer an M.S. in higher education, adult learning, early childhood studies, and instructional design. The cost of these other degrees is greater than the M.S. in Education, making the \$14,730 30-credit M.S. in education the most conservative estimate of degree cost.

²⁹³⁰ See Appendix 14; See also, University of Minnesota, *University of Minnesota*, <http://onestop.umn.edu/> (accessed June 22, 2012).

²⁹³¹ See Appendix 14; See also, University of Minnesota, *University of Minnesota*, <http://onestop.umn.edu/> (accessed June 22, 2012).

²⁹³² *Id.*



From 2009–11, Walden spent an average of \$9,824 to train veterans eligible for post-9/11 GI bill benefits, compared to an average of \$4,642 per veteran spent by public colleges.²⁹³³ While Walden collects more than average for each veteran it enrolls, the public college average includes students attending less expensive 2-year degree programs which are not offered by Walden.

Recruiting

Enrollment growth is critical to the business success of for-profit education companies. In order to meet revenue and profit expectations, for-profit colleges recruit as many students as possible to sign up for their programs.

During the period examined, and prior to the July 2011 ban on paying recruiters based on the number of students enrolled, documents produced by the company reveal an enrollment-driven culture that may have influenced the recruiting tactics employed by the enrollment staff. For example, Walden’s sales staff employed “overcoming objections” scripts that anticipate and rebut the types of

²⁹³³ See Appendix 11. Post-9/11 GI bill disbursements for August 1, 2009-June 15, 2011 provided to the committee from the Senate Committee on Veterans Affairs via the Department of Veterans Affairs on July 18, 2011.

objections prospective students have.²⁹³⁴ The objections covered include cost, time to completion, time commitment, third party concerns, credibility, school support services, lack of face-to-face instruction, and other school shopping.²⁹³⁵

The company also closely monitors “talk time,” the amount of time recruiters spend on the phone with prospective students and hold weekly “talk time challenges.”²⁹³⁶ In mid-2008, a mid-level enrollment manager also developed an initiative to increase the amount of talk time expected of each enrollment advisor with the objective of “defining and strengthening our sales culture.”²⁹³⁷ While company officials state that the initiative was never implemented, it was envisioned as a two-stage process to increase the time enrollment advisors were expected to spend on the phone by 3 to 4 hours each day.²⁹³⁸ Other internal emails announce and discuss additional employee contests and recognition events.²⁹³⁹

While the majority of student responses to Walden’s 2007 enrollment advisor scorecard survey indicate that students were satisfied with the recruiting process, some students complained that recruiters misled them in order to induce their enrollment.²⁹⁴⁰ While student complaints are not representative of the experience of the majority of students, they do provide an important window into practices that appear to be occurring. One such complaint included in the survey reads:

[My enrollment advisor] told me that I would be allowed to double my classes after I had completed the first course. I then petitioned to do this. I was told that this is not true. The ability to double up was one of the main reasons I chose Walden. I am VERY UPSET that I was LIED to ... Unfortunately, I have already invested a great deal of money and time into this program. If this were not the case, I would reevaluate my choice.²⁹⁴¹

The most frequent complaint lodged by Walden students was that enrollment advisors misrepresented the time commitment required. One student writes:

I think the advisor need to be more honest about the online time and requirements ... I think advisors should be honest about the required dedication and time it will take to pursue an online degree.²⁹⁴²

Indeed, the results of the 2010 student satisfaction survey published on Walden’s Web site indicate that approximately 50 percent of students responded that the amount of time required for their program was above what they expected when they first started.²⁹⁴³

²⁹³⁴ See Walden E-Learning LLC, *Overcoming Objections* (WALDEN-HELP-0006443) [NOTE: Internal training document with title, no date]; Walden University, *Overcoming Objections* (WALDEN-HELP-0006290) [NOTE: Internal training document with title, no date].

²⁹³⁵ Id. at WALDEN-HELP-0006443.

²⁹³⁶ Walden University, *Spirit Day Winners!!*, June 13, 2008 (WALDEN-HELP-0039862). While Walden continues to use and monitor talk time, it plays no role in setting compensation. A focus on the time spent speaking to prospective students is in many ways a more appropriate policy than tracking the number of calls recruiters are required to make as is the practice at many other for-profit colleges.

²⁹³⁷ Walden University, *Re: Talk Time Initiative*, July 1, 2008 (WALDEN-HELP-0039869 at WALDEN-HELP-0039871).

²⁹³⁸ Id. See also Walden E-Learning LLC, *Talk Time Initiative*, (WALDEN-HELP-0037558). [NOTE: Internal training document, no date].

²⁹³⁹ Walden University, *Spirit Day Tomorrow!*, June 26, 2008 (WALDEN-HELP-0039868); Walden University, *Talk Time contest tomorrow...*, December 11, 2008 (WALDEN-HELP-0035955); Walden University, *Spirit Day Winners!!*, June 13, 2008 (WALDEN-HELP-0039862); Walden E-Learning LLC, *Types of Recommended Recognition Events* (WALDEN-HELP-0037384) [Note: document is a draft not implemented].

²⁹⁴⁰ Walden E-Learning LLC, *Enrollment Advisor Scorecard, Q3 2007* (WALDEN-HELP-0037400).

²⁹⁴¹ Id., at WALDEN-HELP-0037432.

²⁹⁴² Id., at WALDEN-HELP-0037428.

Outcomes

Committee staff analysis shows that tremendous numbers of students leave for-profit colleges without a degree. At for-profit colleges, 98 percent of students who enroll in a 2-year degree program and 96 percent who enroll in a 4-year degree program take out loans, and as a result, hundreds of thousands of students leave for-profit colleges with debt but without a diploma or degree each year.²⁹⁴⁴

Two metrics are key to assessing student outcomes: (1) retention rates based on information provided to the committee, and (2) student loan “cohort default rates.” An analysis of these metrics indicates that while some people who enroll in Walden are not achieving their educational and career goals, overall, the company is doing a much better job of serving students than many of the companies examined.

Retention Rates

Information Walden provided to the committee indicates that relatively few students who enrolled in the company’s Master’s degree program in 2008–9 withdrew by mid-2010: 3,309 of 11,770 students, or 28.1 percent.²⁹⁴⁵ Students who enrolled in Walden’s Bachelor’s degree programs, however, had a significantly higher rate of withdrawal, with 51.4 percent, or 1,659 students, withdrawing by mid-2010.²⁹⁴⁶ These students also withdrew within a median of 3 months.²⁹⁴⁷ Compared to the sector-wide Bachelor’s withdrawal rate of 54.3, fewer students withdrew from Walden.²⁹⁴⁸

| Status of Students Enrolled in Walden E-Learning LLC in 2008-9, as of 2010 | | | | | | |
|--|------------|-------------------|------------------------|-------------------|------------------|-------------|
| Degree Level | Enrollment | Percent Completed | Percent Still Enrolled | Percent Withdrawn | Number Withdrawn | Median Days |
| Bachelor’s Degree | 3,230 | 1.4% | 47.3% | 51.4% | 1,659 | 91 |
| Masters | 11,770 | 14.4% | 57.5% | 28.1% | 3,309 | 173 |
| Doctoral | 5,325 | .6% | 59.8% | 39.6% | 2,108 | 174 |
| All Students | 20,325 | 8.7% | 56.5% | 34.8% | 7,076 | 154 |

The dataset does not capture some students who withdraw and subsequently return, which is one of the flexibility advantages of the for-profit education model. The analysis also does not account for students who withdrew after mid-2010 when the data was produced.

²⁹⁴³ Walden University. *Demonstrating Accountability, Transparency, and Assessment (DATA) project, Time Commitment Expectations*, <http://www.waldenu.edu/About-Us/33560.htm> (accessed July 9, 2012).

²⁹⁴⁴ Patricia Steele & Sandy Baum, “How Much Are College Students Borrowing?,” *College Board Policy Brief*, August 2009, http://advocacy.collegeboard.org/sites/default/files/09b_552_PolicyBrief_WEB_090730.pdf (accessed June 22, 2012).

²⁹⁴⁵ Senate HELP Committee staff analysis. See Appendix 15. Rates track students who enrolled between July 1, 2008 and June 30, 2009. For-profit education companies use different internal definitions of whether students are “active” or “withdrawn.” The date a student is considered “withdrawn” varies from 10 to 90 days from date of last attendance. Two companies provided amended data to properly account for students that had transferred within programs. Committee staff note that the data request instructed companies to provide a unique student identifier for each student, thus allowing accurate accounting of students who re-entered or transferred programs within the school. The dataset is current as of mid-2010, students who withdrew within the cohort period and re-entered afterward are not counted. Some students counted as withdrawals may have transferred to other institutions.

²⁹⁴⁶ Id.

²⁹⁴⁷ Id.

²⁹⁴⁸ It is not possible to compare student retention or withdrawal rates at public or non-profit institutions because this data was provided to the committee directly by the companies. While the Department of Education tracks student retention and outcomes for all colleges, because students who have previously attended college are excluded from the data set, it fails to provide an accurate picture of student outcomes or an accurate means of comparing for-profit and non-profit and public colleges.

Moreover, according to the company, while the Bachelor's degree program was initiated in the winter of 2007–8, 1 year prior to the period requested and analyzed by the committee, by the time of the committee's request, Walden executives had themselves noted the disparities in student persistence rates between the graduate and undergraduate programs.²⁹⁴⁹ A July 2010 email exchange between Walden's then-president and the national director of financial aid illustrates this internal concern regarding Walden's undergraduate program. The president asks: "Can we project what CDR will look like for 2009, for example, which will account for a larger population of undergrad than we had ever had before?," and later responds, "We can't be flying blind particularly with the issues we are seeing with undergrad."²⁹⁵⁰ To address these concerns, in December 2010 Walden instituted a conditional admission policy for undergraduate students, the Adequate Academic Progress policy.²⁹⁵¹ The AAP requires that students adequately complete assignments for the first 3 weeks of class, or the student is automatically withdrawn without any tuition obligation.²⁹⁵²

Student Loan Defaults

The Department of Education tracks and reports the number of students who default on student loans (meaning that the student does not make payments for at least 360 days) within 3 years of entering repayment, which usually begins 6 months after leaving college.²⁹⁵³

Slightly more than 1 in 5 students who attended a for-profit college (22 percent) defaulted on a student loan, according to the most recent data.²⁹⁵⁴ In contrast, 1 student in 11 at public and non-profit schools defaulted within the same period.²⁹⁵⁵ On the whole, students who attended for-profit schools default at nearly three times the rate of students who attended other types of institutions.²⁹⁵⁶ The consequence of this higher rate is that almost half of all student loans defaults nationwide are held by students who attended for-profit colleges.

The default rate across all 30 companies examined increased each fiscal year between 2005 and 2008, from 17.1 percent to 22.6 percent.²⁹⁵⁷ This change represents a 32.6 percent increase over 4 years.²⁹⁵⁸ Although Walden's default rate has gradually increased, growing from 1.7 percent for students entering repayment in 2005 to 3.0 percent for students entering repayment in 2008, the default rate is significantly lower than the average, not just for for-profit colleges but for all colleges.²⁹⁵⁹

²⁹⁴⁹ Letter from Walden University chief executive officer Jonathan Kaplan to committee staff, June 19, 2012.

²⁹⁵⁰ Walden University, *Re: CDR*, July 17, 2010 (WALDEN-HELP-0040024 at WALDEN-HELP-0040025).

²⁹⁵¹ Letter from Walden University chief executive officer Jonathan Kaplan to committee staff, June 19, 2012.

²⁹⁵² *Id.*

²⁹⁵³ 34 CFR § 668.183(c).

²⁹⁵⁴ Senate HELP Committee staff analysis of U.S. Department of Education Trial Cohort Default Rates fiscal year 2005-8, <http://federalstudentaid.ed.gov/datacenter/cohort.html>. Default rates calculated by cumulating number of students entered into repayment and default by sector.

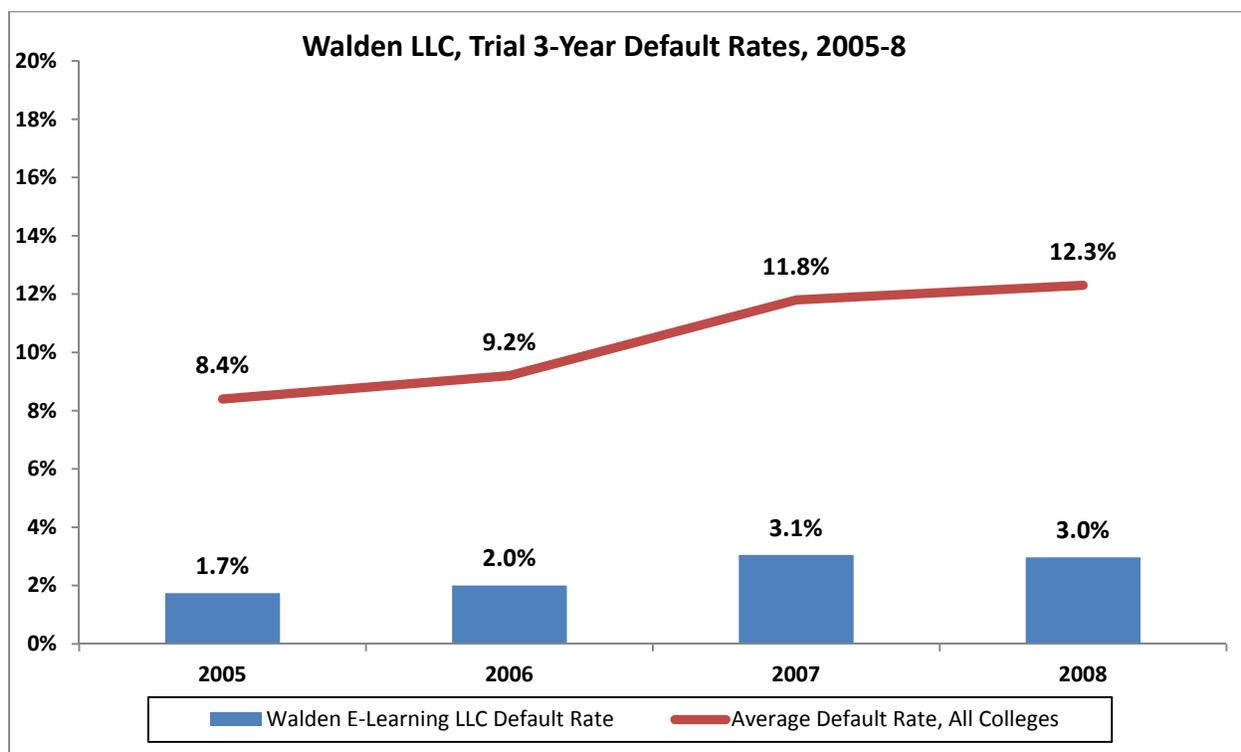
²⁹⁵⁵ *Id.*

²⁹⁵⁶ *Id.*

²⁹⁵⁷ Senate HELP Committee staff analysis of U.S. Department of Education Trial Cohort Default Rates fiscal year 2005-8, <http://federalstudentaid.ed.gov/datacenter/cohort.html>. Default rates calculated by cumulating number of students entered into repayment and default for all OPEID numbers controlled by the company in each fiscal year. See Appendix 16.

²⁹⁵⁸ *Id.*

²⁹⁵⁹ *Id.*



While Walden produced a September 2009 email that indicates the company had not yet initiated a comprehensive default management plan, executives raise the possibility that they would do so in the future.²⁹⁶⁰

Instruction and Academics

The quality of any college's academics is difficult to quantify. However, the amount that a school spends on instruction per student compared to other spending is a useful indicator.

Walden spent \$1,574 per student on instruction in 2009, compared to \$2,230 per student on marketing and \$1,915 per student on profit.²⁹⁶¹ The amount Walden spent on instruction per student is the second lowest of the privately held companies the committee examined; the amount that the privately held companies spent ranges from \$1,118 to \$6,389 per student per year.²⁹⁶² By comparison, public and non-profit schools, generally spend a higher amount per student on instruction. On a per

²⁹⁶⁰ Walden University, *Fw: FY 2007 Official Cohort Default Rate*, September 15, 2009 (WALDEN-HELP-0040057).

²⁹⁶¹ Senate HELP Committee staff analysis. See Appendix 20, Appendix 21, and Appendix 22. Marketing and profit figures provided by company or Securities and Exchange filings, instruction figure from IPEDS. IPEDS data for instruction spending based on instructional cost provided by the company to the Department of Education. According to IPEDS, instruction cost is composed of "general academic instruction, occupational and vocational instruction, special session instruction, community education, preparatory and adult basic education, and remedial and tutorial instruction conducted by the teaching faculty for the institution's students." Denominator is IPEDS "full-time equivalent" enrollment. Walden notes that IPEDS instructional spending figures reflect that responsibility for course development and revision is included in instructor salaries for traditional colleges, while it is generally reported by for-profit colleges as a capital expenditure. Capital expenditures totaled \$23.3 million for Walden in 2009, and included both technology investments and program and course development.

²⁹⁶² *Id.* Drake College of Business (low end) and Chancellor University (high end) have been excluded from this calculation due to unreliability regarding the data.

student basis, the University of Minnesota spent \$13,247 per student on instruction and University of Saint Thomas spent \$11,361 per student.²⁹⁶³

While per student instruction expenses should be expected to be lower in an exclusively or majority online program, the savings generated by these models do not appear to be passed on to students in lower tuition costs. Similarly, the higher per student instruction costs in public and non-profit colleges may reflect a failure to embrace online models or embrace more efficient spending. However, taken as a whole, these numbers demonstrate that for-profit colleges spend significantly less on instruction than similar programs in other sectors.

A large portion of the faculty at many for-profit colleges is composed of part-time and adjunct faculty. While a large number of part-time and adjunct faculty is an important factor in a low-cost education delivery model, it also raises questions regarding the academic independence they are able to exercise to balance the colleges' business interests. Among the 30 schools the committee examined, 80 percent of the faculty is part-time.²⁹⁶⁴ Walden, however, has more than 90 percent of its faculty employed part-time.²⁹⁶⁵ In 2009, Walden employed 153 full-time and 1,848 part-time faculty.²⁹⁶⁶

Staffing

While for-profit education companies employ large numbers of recruiters to enroll new students, the companies often have far less staff available to provide tutoring, remedial services, or career counseling and placement. Walden, however, employs a relatively large student services staff. In 2009, with 40,714 students, Walden employed 579 recruiters and marketing staff, 3 career services and placement employees, and 471 student services employees. The number of student services representatives is well above the industry average.²⁹⁶⁷ That means each career counselor was responsible for 13,572 students and each student services staffer was responsible for 87 students. Meanwhile, the company employed one recruiter for every 71 students.

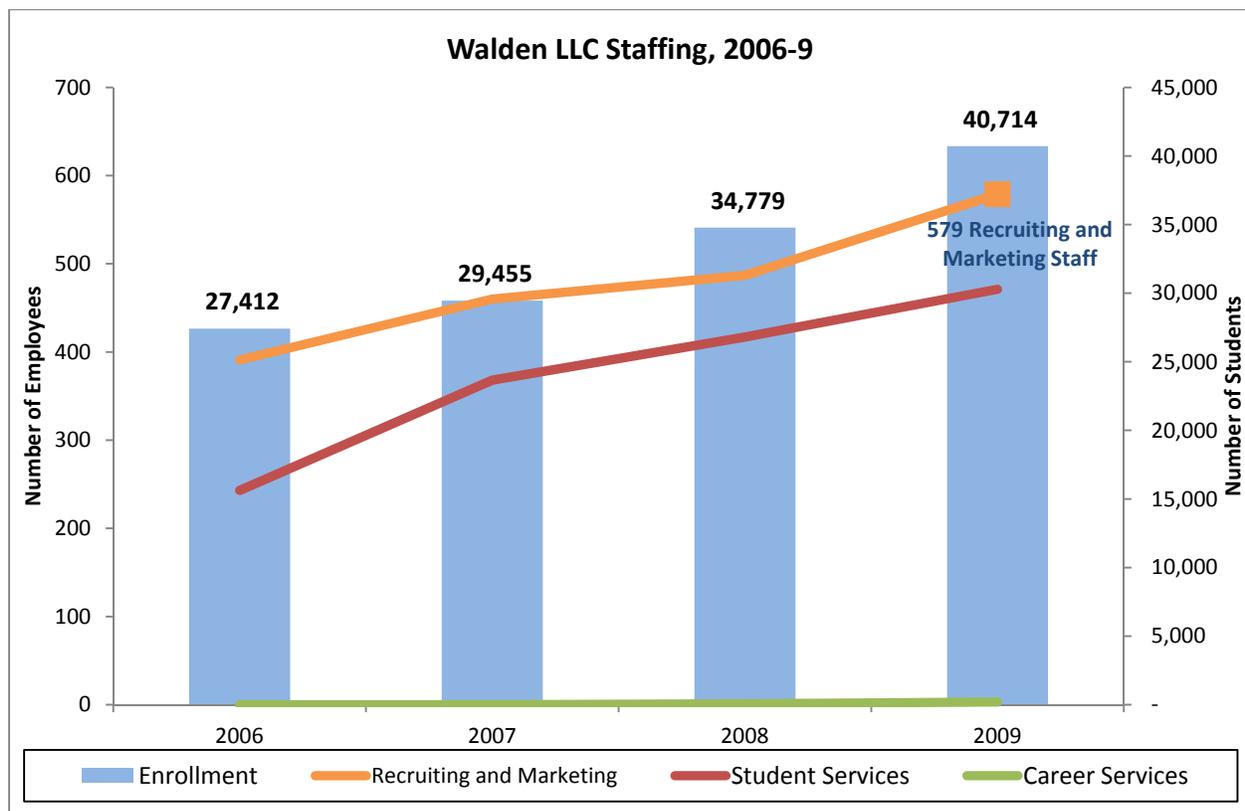
²⁹⁶³ Senate HELP Committee staff analysis. See Appendix 23. Many for-profit colleges enroll a significant number of students in online programs. In some cases, the lower delivery costs of online classes — which do not include construction, leasing and maintenance of physical buildings — are not passed on to students, who pay the same or higher tuition for online courses.

²⁹⁶⁴ Senate HELP Committee staff analysis of information provided to the committee by the company pursuant to the committee document request of August 5, 2010. See Appendix 24.

²⁹⁶⁵ *Id.*

²⁹⁶⁶ *Id.*

²⁹⁶⁷ *Id.* See Appendix 7 and Appendix 24.



Conclusion

Students attending Walden have significantly better rates of retention than other companies of comparable size. While Walden spends a high portion of revenue on marketing and on profit, and a relatively small amount on per student instruction, the students that it enrolls appear to be faring much better than at many companies the committee examined. Like other companies analyzed, Walden maintains aggressive enrollment goals and employs more than 500 recruiters, however, Walden invests more in student services than many companies reviewed. The instructional spending on its exclusively online programs is low, and with most of the faculty serving in part-time positions there may be concerns regarding the academic independence of the faculty.

Walden's 51.6 percent withdrawal rate for its 4-year Bachelor's degree program is considerably worse than for its graduate programs, however, the company appears to have acted quickly to address this issue by instituting a free orientation program. Walden's basic model of offering graduate level degrees to teachers and nurses already employed in the field suggests that neither the job placement rates of its students nor their enhanced earning power is a particular concern in the graduate degree programs. As the company increases the size of the undergraduate enrollment and prepares for the possibility of a public stock offering, these issues could become a more serious concern.

EXHIBIT B

Doctoral

- Ph.D. in Management
 - General Program
 - Specializations
 - Accounting
 - Engineering Management
 - Finance
 - Human Resource Management
 - Information Systems Management
 - Knowledge Management
 - Leadership and Organizational Change
 - Learning Management
 - Operations Research
 - Self-Designed
 - Course Descriptions
 - Learning Outcomes
 - Program Data

Program Data

Walden is committed to providing the information you need to make an informed decision about where you pursue your education. Please find below detailed information for the Ph.D. in Management relating to the types of occupations this program may lead to, completion rate, program costs, and median loan debt of students who have graduated from this program.

- Occupations
- Program Completion Rate
- Program Costs
- Median Loan Debt

Occupations—This program generally prepares students to enter the types of occupations listed below. For more information on these specific occupations, visit www.onetonline.org.

In addition to this list, there are other career options that graduates of this program may choose to pursue.

View examples of our student and alumni accomplishments in their chosen fields.

| Occupation Name* | Occupation Code* |
|---|------------------|
| Computer and Information Systems Managers | 11-3021 |
| Financial Managers | 11-3031 |
| Industrial Production Managers | 11-3051 |
| Human Resources Managers | 11-3121 |
| General and Operations Managers | 11-1021 |
| Management Analysts | 13-1111 |
| Accountants and Auditors | 13-2011 |
| Financial Specialists, All Other | 13-2099 |
| Business Teachers, Postsecondary | 25-1011 |

*The "occupation name" is a general job title. "Occupation code" refers to the U.S. Bureau of Labor Statistics' Standard Occupation Classification.

Program Completion—The program completion rate is the percentage of students who graduated between July 1, 2009, and June 30, 2010, who completed this program in the normal completion time.

The program completion time may vary depending on transfer of credit and the pace at which a student chooses to complete the program. Because many of the students in this program are working adults and need to balance personal and professional commitments, our academic advisors can help establish an appropriate program of study that enables each student to complete this program in a time frame that works best for him or her.

| Rate | Percentage |
|-------------------------|------------|
| On-time completion rate | 68.5% |

Program Costs—The total program costs are the estimated average costs over the duration of the program, excluding any scholarship or tuition reductions, for students completing the program on time. These costs can vary based on the number of credits. Typically, tuition and fees are subject to change annually.

| Expense | Cost |
|--------------------|----------------------|
| Tuition and Fees | \$73,795 - \$106,555 |
| Books and Supplies | \$3,249- \$3,393 |
| Room and Board | Not applicable |

View cost per credit in the Tuition and Fees section.

Median Loan Debt—The following is the median amount borrowed by all students who completed the program between July 1, 2009, and June 30, 2010. The amount borrowed may include tuition as well as non-institutional costs such as estimated living expenses.

| Loan | Amount |
|------------------------------|----------------|
| Title IV Program Loans | \$77,375 |
| Private Educational Loans | \$0 |
| Institutional Financing Plan | Not applicable |

One Ph.D., Many

See the diverse mi- held by Walden Ph. Management gradu Read More

EXHIBIT C

Home · Doctoral · Ph.D. in Management

Ph.D. in Management

Walden's Ph.D. in Management is one of the few management Ph.D. programs offered online.

The program takes an interdisciplinary approach to the field of management and its influence on the development of individuals and society. You will conduct original research in a specific area of interest as you have the opportunity to learn theories, concepts, and techniques that provide the foundation for sound management decision making. This online Ph.D. in Management can help prepare you to meet the challenges and opportunities in your profession and your organization; study ways to facilitate positive social change; and help enhance your capabilities as a researcher, scholar, manager, or consultant.

An ACBSP-Accredited Management Ph.D.

Walden University's Ph.D. in Management program is accredited by the Accreditation Council for Business Schools and Programs (ACBSP). Among other benefits, ACBSP accreditation provides:

- [Occupations](#)
- [Program Completion Rate](#)
- [Program Costs](#)
- [Median Loan Debt](#)

Occupations—This program generally prepares students to enter the types of occupations listed below. For more information on these specific occupations, visit www.onetonline.org.

In addition to this list, there are other career options that graduates of this program may choose to pursue. To enter certain professions, students may need to satisfy specific additional requirements established by state and/or professional organizations in addition to completing their program.

View examples of our [student](#) and [alumni](#) accomplishments in their chosen fields.

| Occupation Name* | Occupation Code* |
|---|------------------|
| Computer and Information Systems Managers | 11-3021 |
| Financial Managers | 11-3031 |
| Industrial Production Managers | 11-3051 |

*The "occupation name" is a general job title. "Occupation code" refers to the U.S. Bureau of Labor Statistics' Standard Occupation Classification.

Program Completion—The program completion rate is the percentage of students who graduated between July 1, 2011, and June 30, 2012, who completed this program in the normal completion time.

The program completion time may vary depending on transfer of credit and the pace at which a student chooses to complete the program. Because many of the students in this program are working adults and need to balance personal and professional commitments, our academic advisors can help establish an appropriate program of study that enables each student to complete this program in a time frame that works best for him or her.

| Rate | Percentage |
|-------------------------|------------|
| On-time completion rate | 49.3% |

Note: Completion rates reflect graduates from the Knowledge Area Module instructional model which is no longer offered in this program.

Program Costs—The total program costs are the estimated average costs over the duration of the program, excluding any scholarship or tuition reductions, for students completing the program on time. These costs can vary based on the number of credits. Typically, tuition and fees are subject to change annually.

| Expense | Cost |
|--------------------|------------------|
| Tuition and Fees | \$64,860-111,500 |
| Books and Supplies | \$3,604-4,558 |
| Room and Board | Not applicable |

View cost per credit in the [Tuition and Fees](#) section.

Median Loan Debt—The following is the median amount borrowed by all students who completed the program between July 1, 2011, and June 30, 2012. The amount borrowed may include tuition as well as non-institutional costs such as estimated living expenses.

| Loan | Amount |
|------|--------|
|------|--------|



Reaching You



Halimi Hassan, Ph.D. is learning theory and he works toward his Watch now

EXHIBIT D

Program Level - Doctoral degree
Program Length - 66 months

COST

Q. How much will this program cost me?*

- A. Tuition and fees: \$66,260
- Books and supplies: \$3,820
- On-campus room & board: *not offered*

What other costs are there for this program?

For further program cost information [click here](#).

*The amounts shown above include costs for the entire program, assuming normal time to completion. Note that this information is subject to change.

SUCCESS

Q. How long will it take me to complete this program?

- A. The program is designed to take 66 months to complete. Of those that completed the program in 2012-2013, 33% finished in 66 months.

Q. What are my chances of getting a job when I graduate?

- A. The job placement rate for students who completed this program in 2012-2013 is *%.

* This institution is not currently required to calculate a job placement rate for program completers.

FINANCING

Q. What financing options are available to help me pay for this program?

- A. Financing for this program may be available through grants, scholarships, loans (federal and private) and institutional financing plans. The median amount of debt for program graduates is shown below:

- Federal loans: \$132,760
- Private education loans: \$0
- Institutional financing plan: \$0

The school has elected to provide the following additional information: 79% of program graduates used loans to help finance their costs for this program.

Click here for more information on jobs related to this program.

? For additional information related to this program and/or the information provided above. [click here](#).

Date Created: 1/27/2014

EXHIBIT E

Ph.D. in Management

Program Level - Doctoral degree

Program Length - 66 months

COST

Q. How much will this program cost me?*

- A. Tuition and fees: \$66,260
Books and supplies: \$3,820
On-campus room & board: *not offered*

What other costs are there for this program?

For further program cost information [click here](#).

*The amounts shown above include costs for the entire program, assuming normal time to completion. Note that this information is subject to change.

SUCCESS

Q. How long will it take me to complete this program?

- A. The program is designed to take 66 months to complete. Of those that completed the program in 2012-2013, 33% finished in 66 months.

Q. What are my chances of getting a job when I graduate?

- A. The job placement rate for students who completed this program in 2012-2013 is *%.

* This institution is not currently required to calculate a job placement rate for program completers.

FINANCING

Q. What financing options are available to help me pay for this program?

- A. Financing for this program may be available through grants, scholarships, loans (federal and private) and institutional financing plans. The median amount of debt for program graduates is shown below:

Federal loans: \$132,760
Private education loans: \$0
Institutional financing plan: \$0

The school has elected to provide the following additional information: 79% of program graduates used loans to help finance their costs for this program.

Click here for more information on jobs related to this program.

EXHIBIT F

Tuition and Fees - Ph.D. in Management

Email | Print | Share

OVERVIEW | CURRICULUM | **TUITION AND FEES** | CAREER OPTIONS | HIGHLIGHTS | FACULTY | LEARNING OUTCOMES

| Curriculum Component | Requirements | Cost | Total* |
|----------------------------------|--|---|-----------------|
| Course-Based Specializations | 82 total quarter credit hours | \$645 per quarter credit hour | \$52,890 |
| Books and Materials | Estimated costs | \$3,820 | \$3,820 |
| 4-Day Residency Fee | 4 during your program (Residency 2 and Residency 4 may be virtual) | \$1,160 each, plus travel, lodging, and other expenses Virtual: \$1,260 each | \$4,640 |
| Technology Fee | Per quarter | \$120 | \$1,920 |
| Total | | | \$62,490 |
| <i>Transfer up to 40 credits</i> | | | <i>\$26,640</i> |
| Grand Total | | | \$35,850 |

* Time to completion may vary by student, depending on individual progress and credits transferred, if applicable. For a personalized estimate of your time to completion, call an enrollment advisor at 1-866-492-5336.

*Transfer credit total includes reduction in technology fee and books and supplies as related to reduced number of courses over time.

Tuition and fees are subject to change.

Tuition-Reduction Opportunities

We want to make your education as affordable as possible. Explore our limited-time tuition savings options available for some of our most popular programs. You may also be able to save depending on your affiliation with Walden. Find out.

\$5,000 GRANT
If you reside in the U.S.
Learn more

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Last Name *

Email *

Phone * (Numbers only)

State *

Zip / Postal Code *

U.S. / Canadian postal codes only.

By submitting this form, I understand and agree that Walden University may contact me via email, text, telephone, and prerecorded message regarding furthering my education and that calls may be generated using automated technology. You may opt-out at any time. Please view our Privacy Policy or Contact Us for more details.

Submit

EXHIBIT G

PhD in Management

[Request Information](#)

Explore our PhD in Management from Walden

OVERVIEW

TUITION AND FEES

CAREER OPTIONS

HIGHLIGHTS

FACULTY

LEARNING OUTCOMES

| Curriculum Component | Requirements | Cost | Total* |
|---|---|--|-----------------|
| Course-Based Specializations | 86 total quarter credit hours | \$705 per quarter credit hour | \$60,630 |
| 4-Day Residency Fee | Four residencies (Residency 2 may be virtual, Residency 4 may be virtual or a capstone intensive retreat) | \$1,320 (travel, lodging, and other expenses are additional) Virtual: \$1,420 | \$5,280 |
| Technology Fee | Per quarter | \$125 | \$1,500 |
| Total | | | \$67,410 |
| <i>Transfer up to 43 credits</i> | | | <i>\$31,065</i> |
| Total With Maximum Transfer Credits† | | | \$36,345 |

The tuition reflects the minimum time to completion. Time to completion varies by student, depending on individual progress and credits transferred, if applicable. For a personalized estimate of your time to completion, call an enrollment advisor at 1-866-492-5336.

*Tuition and fees are subject to change. Books and materials are not included and may cost up to an additional \$1,400 and \$1,600.

†Maximum transfer credit total includes reduction in technology fee as related to reduced number of courses over time.

Call 1-866-492-5336 for information about a full range of options for:

- Federal Financial Aid
- Transfer of Credit

Tuition-Reduction Opportunities

We want to make your education as affordable as possible. Explore our limited-time tuition savings options available for some of our most popular programs. You may also be able to save depending on your affiliation with Walden. Find out.

Financial Aid

Our financial aid advisors can help you locate funding opportunities to help you pay for your education. [Learn more now.](#)

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Ph.D. in Management

First Name * Last Name *

Email * Phone * (Numbers only)

Missouri ZIP / Postal Code *

U.S. / Canadian postal codes only.



By submitting this form, I understand and agree that Walden University may contact me via email, text, telephone, and prerecorded message regarding furthering my education and that calls may be generated using automated technology. You may opt out at any time. Please view our [privacy policy](#) or [terms of use](#) for more details.

Submit

Curriculum

Walden's PhD in Management program offers a variety of specializations to help you meet your personal and professional goals.

- Finance
- Human Resource Management
- Information Systems Management
- Leadership and Organizational Change
- Self-Designed

"The mentorship at Walden has been the greatest value. It's consistent, empowering, and encouraging. It's provided a wealth of resources."

André Lynch
MBA Graduate and DBA Student

Steps to Your PhD in Management



Watch this step-by-step guide to earning your online doctorate in management at Walden. Watch now.

[Previous](#) [Next](#)

Almost
95%

of Walden alumni responding to our survey said that their program helped them to advance positive social change.

Nearly
90%

of Walden alumni responding to our survey say they are likely or very likely to recommend Walden to others.

More than
90%

of Walden graduates responding to our survey say they are very satisfied or satisfied with Walden.

Source: www.WaldenU.edu/survey_methodology; % calculated on total number of respondents to our 2014 survey.

"I am a strong proponent of Walden's vision of a scholar-practitioner. As a full-time academic who is engaged in the scholarly community, I think the traditional silos between academia and 'the real world' are relics of the past. Walden's social change mandate is not only unique, it is inspiring. It challenges every one of us to not only be better scholars but to be better citizens."

David Finch
PhD in Management Graduate

"The mentorship at Walden has been the greatest value. It's consistent, empowering, and encouraging. It's provided a wealth of resources."

André Lynch
MBA Graduate and DBA Student

Put Your Degree Within Reach.

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LEARN MORE



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EXHIBIT H

Walden University**COST**

Q. How much will this program cost me?*

A. Tuition and fees: \$82,410

Books and supplies: \$4,171

On-campus room & board: *not offered*

.....

What other costs are there for this program?

For further program cost information [click here](#).

* The amounts shown above include costs for the entire program, assuming normal time to completion. Note that this information is subject to change.

FINANCING

Q. What financing options are available to help me pay for this program?

A. Financing for this program may be available through grants, scholarships, loans (federal and private) and institutional financing plans. The median amount of debt for program graduates is shown below:

Federal loans: \$97,090

Private education loans: \$0

SUCCESS

Q. How long will it take to complete this program?

A. The program is complete. Of the graduates who completed the program in 2015, it took an average of 36 months.

Q. What are my career options after I graduate?

A. The job placement rate for graduates of this program is 95%.

.....

* This institution is not required to disclose placement rate for programs with fewer than 15 graduates.

Cl
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on
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EXHIBIT I

[Go back to Walden's Ph.D. in Psychology program](#)

Walden University

Program Level - Doctoral Degree
Program Length - 72 months



COST

Q. How much will this program cost me?*

- A. Tuition and fees: \$67,610
- Books and supplies: \$6,180
- On-campus room & board: *not offered*

What other costs are there for this program?

For further program cost information [click here](#).

*The amounts shown above include costs for the entire program, assuming normal time to completion. Note that this information is subject to change.

SUCCESS

Q. How long will it take me to complete this program?

- A. The program is designed to take 72 months to complete. Of those that completed the program in 2013-2014, 44% finished in 72 months.

Q. What are my chances of getting a job when I graduate?

- A. The job placement rate for students who completed this program is *%.

* This institution is not currently required to calculate a job placement rate for program completers.

FINANCING

Q. What financing options are available to help me pay for this program?

- A. Financing for this program may be available through grants, scholarships, loans (federal and private) and institutional financing plans. The median amount of debt for program graduates is shown below:

- Federal loans: \$115,000
- Private education loans: \$0
- Institutional financing plan: \$0

The school has elected to provide the following additional information: 85% of program graduates used loans to help finance their costs for this program.



EXHIBIT J

Walden University

PhD in Psychology

Program Level - Doctoral degree

Program Length - 66 months



COST

Q. How much will this program cost me?*

- A. Tuition and fees: **\$86,987**
- Books and supplies: **\$6,551**
- On-campus room & board: *not offered*

What other costs are there for this program?

For further program cost information [click here](#).

* The amounts shown above include costs for the entire program, assuming normal time to completion. Note that this information is subject to change.

SUCCESS

Q. How long will it take me to complete this program?

- A. The program is designed to take 66 months to complete. Of those that completed the program in 2014-2015, 21% finished in 66 months.

Q. What are my chances of getting a job when I graduate?

- A. The job placement rate for students who completed this program is *%.

* This institution is not currently required to calculate a job placement rate for program completers.

FINANCING

Q. What financing options are available to help me pay for this program?

- A. Financing for this program may be available through grants, scholarships, loans (federal and private) and institutional financing plans. The median amount of debt for program graduates is shown below:

- Federal loans: **\$121,077**
- Private education loans: **\$0**
- Institutional financing plan: **\$0**

The school has elected to provide the following additional information: 84% of program graduates used loans to help finance their costs for this program.

Click here for more information on jobs related to this program.

EXHIBIT K

[Go back to Walden's Ph.D. in Health Services program](#)

Program Level - Doctoral degree
Program Length - 66 months

COST

Q. How much will this program cost me?*

- A. Tuition and fees: \$59,285
Books and supplies: \$4,494
On-campus room & board: *not offered*

.....
What other costs are there for this program?

For further program cost information [click here](#).

*The amounts shown above include costs for the entire program, assuming normal time to completion. Note that this information is subject to change.

SUCCESS

Q. How long will it take me to complete this program?

- A. The program is designed to take 66 months to complete. Of those that completed the program in 2012-2013, 27% finished in 66 months.

Q. What are my chances of getting a job when I graduate?

- A. The job placement rate for students who completed this program in 2012-2013 is *%.

.....
* This institution is not currently required to calculate a job placement rate for program completers.

FINANCING

Q. What financing options are available to help me pay for this program?

- A. Financing for this program may be available through grants, scholarships, loans (federal and private) and institutional financing plans. The median amount of debt for program graduates is shown below:

- Federal loans: \$38,383
Private education loans: \$0
Institutional financing plan: \$0

.....
The school has elected to provide the following additional information: 64% of program graduates used loans to help finance their costs for this program.

Click here for more information on jobs related to this program.

EXHIBIT L

[Go back to Walden's Ph.D. in Public Policy and Administration program](#)

Ph.D. in Public Policy and Administration
Program Level - Doctoral degree
Program Length - 66 months

COST

Q. How much will this program cost me?*

A. Tuition and fees: \$48,650
Books and supplies: \$3,933
On-campus room & board: *not offered*

What other costs are there for this program? *

For further program cost information [click here](#).

*The amounts shown above include costs for the entire program, assuming normal time to completion. Note that this information is subject to change

SUCCESS

Q. How long will it take me to complete this program?

A. The program is designed to take 66 months to complete. Of those that completed the program in 2012-2013, 100% finished in 66 months.

Q. What are my chances of getting a job when I graduate?

A. The job placement rate for students who completed this program in 2012-2013 is *%.

* This institution is not currently required to calculate a job placement rate for program completers.

FINANCING

Q. What financing options are available to help me pay for this program?

A. Financing for this program may be available through grants, scholarships, loans (federal and private) and institutional financing plans. The median amount of debt for program graduates is shown below:

Federal loans: \$51,749
Private education loans: \$0
Institutional financing plan: \$0

The school has elected to provide the following additional information: 74% of program graduates used loans to help finance their costs for this program.

Click here for more information on jobs related to this program.

EXHIBIT M

Walden University

Program Level - Doctoral degree

Program Length - 55 months



COST

Q. How much will this program cost me?*

- A. Tuition and fees: \$67,241
Books and supplies: \$4,367
On-campus room & board: *not offered*

What other costs are there for this program?

For further program cost information [click here](#).

* The amounts shown above include costs for the entire program, assuming normal time to completion. Note that this information is subject to change.

FINANCING

Q. What financing options are available to help me pay for this program?

- A. Financing for this program may be available through grants, scholarships, loans (federal and private) and institutional financing plans. The median amount of debt for program graduates is shown below:

Federal loans: \$112,205
Private education loans: \$0
Institutional financing plan: \$0

The school has elected to provide the following additional information: 82% of program graduates used loans to help finance their costs for this program.

SUCCESS

Q. How long will it take me to complete this program?

- A. The program is designed to take 55 months to complete. Of those that completed the program in 2014-2015, 28% finished in 55 months.

Q. What are my chances of getting a job when I graduate?

- A. The job placement rate for students who completed this program is *%.

* This institution is not currently required to calculate a job placement rate for program completers.

[Click here for more information on jobs related to this program.](#)

EXHIBIT N

[Go back to Walden's Doctor of Business Administration \(D.B.A.\) program](#)

Doctor of Business Admin
Program Level - Doctoral degree
Program Length - 42 months

COST

Q. How much will this program cost me?
A. Tuition and fees: \$55,800
Books and supplies: \$0
On-campus room & board: *not offered*

What other costs are there for this program?

For further program cost information [click here](#).

*The amounts shown above include costs for the entire program, assuming normal time to completion. Note that this information is subject to change.

SUCCESS

Q. How long will it take me to complete this program?
A. The program is designed to take 42 months to complete. Of those that completed the program in 2012-2013, 55% finished in 42 months.

Q. What are my chances of getting a job when I graduate?
A. The job placement rate for students who completed this program in 2012-2013 is *%.

* This institution is not currently required to calculate a job placement rate for program completers.

FINANCING

Q. What financing options are available to help me pay for this program?
A. Financing for this program may be available through grants, scholarships, loans (federal and private) and institutional financing plans. The median amount of debt for program graduates is shown below:

Federal loans: \$63,334
Private education loans: \$0
Institutional financing plan: \$0

The school has elected to provide the following additional information: 67% of program graduates used loans to help finance their costs for this program.

Click here for more information on jobs related to this program.

EXHIBIT O

[Go back to Walden's Doctor of Business Administration \(DBA\) program](#)

Walden University

Doctor of Business Administration

Program Level - Doctoral degree

Program Length - 50 months



COST

Q. How much will this program cost me?*

- A. Tuition and fees: \$75,931
Books and supplies: \$0
On-campus room & board: *not offered*

What other costs are there for this program?

For further program cost information [click here](#).

* The amounts shown above include costs for the entire program, assuming normal time to completion. Note that this information is subject to change.

FINANCING

Q. What financing options are available to help me pay for this program?

- A. Financing for this program may be available through grants, scholarships, loans (federal and private) and institutional financing plans. The median amount of debt for program graduates is shown below:

Federal loans: \$61,500
Private education loans: \$0
Institutional financing plan: \$0

The school has elected to provide the following additional information: 62% of program graduates used loans to help finance their costs for this program.

SUCCESS

Q. How long will it take me to complete this program?

- A. The program is designed to take 50 months to complete. Of those that completed the program in 2014-2015, 52% finished in 50 months.

Q. What are my chances of getting a job when I graduate?

- A. The job placement rate for students who completed this program is *%.

* This institution is not currently required to calculate a job placement rate for program completers.

[Click here for more information on jobs related to this program.](#)

EXHIBIT P

WALDEN UNIVERSITY

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SEARCH

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[Home](#) > [Degree Programs](#) > [Doctoral](#) > [Ph.D. in Public Health](#) > Program Data

Share

Doctoral

[Ph.D. in Public Health](#)

Specializations by Track

[Track I: Community Health Education](#)

[Track I Epidemiology](#)

[Track II: Community Health Education](#)

[Track II Epidemiology](#)

[Career Opportunities](#)

[Course Descriptions](#)

[Learning Outcomes](#)

[Program Highlights](#)

[Program Data](#)

Program Data

Walden is committed to providing the information you need to make an informed decision about where you pursue your education. Please find below detailed information for the Ph.D. in Public Health relating to the types of occupations this program may lead to, completion rate, program costs, and median loan debt of students who have graduated from this program.

[Occupations](#)
[Program Completion Rate](#)
[Program Costs](#)
[Median Loan Debt](#)

Occupations—This program generally prepares students to enter the types of occupations listed below. For more information on these specific occupations, visit www.onetonline.org.

In addition to this list, there are other career options that graduates of this program may choose to pursue.

View examples of our student and alumni accomplishments in their chosen fields.

The program completion time may vary depending on transfer of credit and the pace at which a student chooses to complete the program. Because many of the students in this program are working adults and need to balance personal and professional commitments, our academic advisors can help establish an appropriate program of study that enables each student to complete this program in a time frame that works best for him or her.

| Rate | Percentage |
|-------------------------|------------|
| On-time completion rate | 88.9% |

Program Costs—The total program costs are the estimated average costs over the duration of the program, excluding any scholarship or tuition reductions, for students completing the program on time. These costs can vary based on the number of credits. Typically, tuition and fees are subject to change annually.

| Expense | Cost |
|--------------------|---------------------|
| Tuition and Fees | \$52,355 - \$66,855 |
| Books and Supplies | \$2,961 - \$4,301 |
| Room and Board | Not applicable |

View cost per credit in the Tuition and Fees section.

Median Loan Debt—The following is the median amount borrowed by all students who completed the program between July 1, 2009, and June 30, 2010. The amount borrowed may include tuition as well as non-institutional costs such as estimated living expenses.

| Loan | Amount |
|------------------------------|----------------|
| Title IV Program Loans | \$37,542 |
| Private Educational Loans | \$0 |
| Institutional Financing Plan | Not applicable |

EXHIBIT Q

Walden University

PhD in Public Health

Program Level - Doctoral degree

Program Length - 63 months

COST

Q. How much will this program cost me?*

- A. Tuition and fees: \$70,563
- Books and supplies: \$3,710
- On-campus room & board: *not offered*

.....
What other costs are there for this program?

For further program cost information [click here](#).

* The amounts shown above include costs for the entire program, assuming normal time to completion. Note that this information is subject to change.

FINANCING

Q. What financing options are available to help me pay for this program?

- A. Financing for this program may be available through grants, scholarships, loans (federal and private) and institutional financing plans. The median amount of debt for program graduates is shown below:

Federal loans: \$102,500

SUCCESS

Q. How long will it take me to complete this program?

- A. The program is designed to take 63 months to complete. Of those that completed the program in 2014-2015, 30% finished in 63 months.

Q. What are my chances of getting a job when I graduate?

- A. The job placement rate for students who complete this program is *%.

.....
* This institution is not currently required to calculate a job placement rate for program completers.

Click here for more information on jobs related to this program.

EXHIBIT R

Walden University

2013–2014 Handbook

December 2013

Student Responsibility in an Online Learning Environment

In an online learning environment, students and faculty are actively engaged in the learning process. In such an environment, students will encounter many viewpoints on issues that may be different than their own. Additionally, expectations for learning in a distance environment may be different from what they are used to. Therefore, students are expected to adhere to the following standards:

- Read carefully and understand the requirements as published in the course syllabus. Pay particular attention to deadlines for submitting work. Develop an alternative technology plan should the student's primary means of classroom contact be unavailable.
- Read all postings by faculty members and classmates. Being able to provide and receive critical and constructive feedback is important for one's academic success.
- Respect differing viewpoints based on cultural and intellectual differences as part of healthy intellectual exchange.
- Contact the faculty member if they (1) need additional feedback, (2) are unclear about any aspect of the course assignments, or (3) are not feeling comfortable with some other aspect of the course.
- Provide and receive critical and constructive feedback in the Discussion Board from colleagues as outlined in the posting rubric. Students should conduct themselves as they would in a classroom environment.
- Be aware of issues of confidentiality. Students should be especially careful of what they disclose about themselves or others in the virtual classroom environment.

Students should contact the Academic Advising Team if they have any questions related to their program of study or if they are experiencing difficulty in the classroom.

Faculty Services

- Communicating With Instructors
- Faculty Mentoring and Teaching Responsibilities
- Faculty Mentoring for KAM Students

Walden instructors are facilitators, teachers, evaluators, partners, coaches, and colleagues to their students and are the main source of guidance and support for them. Instructors also engage in a variety of scholarly, university, and community service activities. Like Walden students, they are busy professionals. Walden encourages students and instructors to gain the most from their relationship by communicating frequently.

Appointments of faculty mentors, course instructors, assessors, advisors, dissertation, doctoral study, and thesis chairs, and committee members usually last for the term of each specific assignment. However, the university recognizes that situations necessitating a change in faculty services may arise. Such situations include unexpected interruptions in instructor availability or instances when one party wishes a change in services. The university does not accept requests for changes that imply degradation of academic quality or integrity.

Unexpected interruptions: Faculty services may be unexpectedly interrupted because of an instructor's death or prolonged ill health, or because of an instructor's discontinuation of association with the university. In such cases, the student's associate dean/executive director, or designee, ensures that faculty services are restored to all affected students. The associate

dean/executive director or designee communicates with affected students throughout the restoration process until appropriate assignments are finalized.

Working out differences: The university encourages students and instructors to discuss problems or differences in expectations in a frank and open manner. When students and instructors address problems promptly, they can often resolve issues with minimal disruption to the learning experience.

Requesting a change: However, in some cases, differences are not easily resolved. Individuals who want to request a change in faculty services must contact an academic advisor, who will consult the associate dean/executive director, or designee. Any change in faculty services, including faculty mentors or dissertation/doctoral study/thesis chairs, can be made only during the add/drop period of each term.

Submitting a formal request: If an amicable resolution of any problems between students and instructors cannot be reached, the party requesting a change of arrangement may be advised to submit a formal written request to the associate dean/executive director, or designee, who reviews the request, consults all appropriate parties, and renders a decision within 21 calendar days of receiving all related information. The associate dean/executive director or designee communicates this decision to all affected parties. The decision of the associate dean/executive director or designee on issues other than violations of academic integrity may be appealed to the chief academic officer, following the procedure described in the Appeals Process in the section on Student Appeals and Grievances. Decisions of the associate dean/executive director for violations of academic integrity are final and may not be appealed.

Communicating With Instructors

- Students are responsible for keeping their contact information accurate and current. Students may update their contact information by changing it on their *myWalden* university portal or by e-mailing changes to infochanges@waldenu.edu.
- The primary form of official communication with Walden faculty members is within Walden course shells and via Walden e-mail. Students are required to use their Walden e-mail addresses and to contact faculty members via the faculty member's Walden e-mail account. Students should also ensure spam filters are set to receive mail from the university. The convention for Walden e-mail addresses is firstname.lastname@waldenu.edu.
- Once enrolled, students should check their Walden e-mail frequently, so that they can begin receiving important information from instructors and staff.
- Instructors provide contact information in the electronic learning classroom.
- Drafts and final products must be submitted electronically within the classroom (or Research Shell for KAM and research).
- All coursework communication with faculty—including draft and final course papers, submissions to faculty for review, KAM demonstrations, and thesis, dissertation, and doctoral study drafts and manuscripts—must be conducted in the learning platform to maintain a record of the academic experience. Students should submit all work within the course and faculty members will return grades and graded coursework within the course. For inquiries about coursework and research guidance, students are

Grades of *I* (Incomplete) are given at the discretion of the instructor, but normally are granted only if students have acceptably completed approximately 80% of the coursework, including discussions and assignments, prior to the last day of the class. Students must request a grade of *I* (Incomplete) prior to the last day of the course. Such a request should include a list of missing assignments and a date and plan for submission of missing assignments, no later than 60 calendar days from the last date of the course. Discussion assignments may not be made up after the last date of class. Coursework submitted within the allowed time period, not to exceed 60 calendar days from the last day of classes, will be graded and included in computation of an overall course grade that will replace the *I* grade. Failure to complete the specified coursework within the allowed time will cause the grade of *I* to default to an *F* (Fail) or *U* (Unsatisfactory), depending on the course grading scheme.

Faculty Members' Accessibility

Please note that these are university expectations. Programs or courses may have more stringent guidelines in some areas, so students and faculty should refer to the course syllabus for the guidelines and policies for this specific course.

Walden expects faculty members to be reasonably accessible to students. The expectation of reasonable accessibility does not mean 24/7 access of faculty members to students. However, it does mean that students receive quality feedback on course submissions within a reasonable time frame.

All assignments and communication should be conducted within the learning platform to support consistency and documentation of learning outcomes.

Faculty Members' Contact Information

Faculty members are required to state their Walden e-mail addresses in the appropriate area in course platforms and in faculty directories, and in correspondence with students. Faculty members may, at their discretion, offer students their contact phone numbers, but are not required to do so.

Faculty Members' Feedback

Faculty members are to return graded classroom assignments that are submitted by the due date to students within 10 calendar days of the assignments' due dates for coursework in classrooms, and within 14 calendar days of the due date for manuscript drafts (including KAMs, theses, doctoral studies, and dissertations) in research forums. Faculty members are to provide a grade and also written, formative feedback on assignments. Assignments that are submitted late may be graded with feedback in the time frame of the instructor. Late assignments may receive minimal feedback other than the grade. The faculty member is expected to give priority to assignments submitted on time.

Faculty Members' Availability

Faculty members are expected to be available to students outside the course discussion areas and in addition to providing substantive feedback on assignments and discussion posts. Faculty members will publish their availability to students through course syllabi, instructor information

| | |
|--|--|
| Form and Style Review | Upon approval of the completed thesis by the student's URR reviewer, the document will be submitted to a Form and Style (F&S) editor for an F&S Review, a final check for errors in APA style, spelling, grammar, punctuation, and related issues. |
| Complete Thesis Oral Conference | Following F&S approval, the student will present the thesis to the chair via a teleconference scheduled with the OSRA. The oral conference is a formal discussion of the scholarly content of the thesis followed by an evaluation of the student's thesis. For more information on this step, see your <i>Thesis Guidebook</i> and visit the Walden Research Center web page for further step-by-step guidance. |
| Final URR Review | After successful completion of the oral and committee approval of the thesis, the chair forwards the final document along with the consensus rubric to the URR reviewer for review while copying thesis@waldenu.edu . At this time, the URR reviewer conducts a final review to make sure all methodological, content, and writing issues have been addressed. <i>In addition, the URR reviewer reviews the abstract to make sure it meets university guidelines.</i> |
| Chief Academic Officer Review | When approval from the URR reviewer has been received, the OSRA will send the abstract of the thesis to the university Chief Academic Officer (CAO) or designate. Upon CAO approval, the thesis is officially completed. |

Capstone Research: Dissertation or Doctoral Study

Doctoral Committee Member Roles and Functions

Faculty members in Walden University doctoral programs who accept the duty of serving on a dissertation or doctoral study committee assume a dual responsibility of high importance. One part is service to their students; the other is service to the academic practice, discipline, and professional field to which the dissertation is related. For the first part, expectations concerning the faculty service to be performed are determined by students' needs, and by university academic policy pertaining to how these needs are to be addressed. For the second, expectations are set both by university academic policy and by policies and practice that frame acceptable work in the discipline and professional field at large.

The committee's guidance to students will be "team advice." Any written dialogue between a student and a committee member is shared within the committee. Committee members recognize that issues may be controversial, divide opinions, or otherwise cause disagreement. When conflicts arise, the committee members are obligated to restrict the discussion to only other committee members and the committee chairperson, to avoid involving students in disputes or disagreements among themselves. The committee chairperson will act as a mediator to resolve the situation and obtain a consensus.

Walden intends that dissertation/doctoral study committee members work as a team, directly guiding students through the proposal, research and analysis, and ultimately the final oral presentation. Although the committee members are expected to support and facilitate students' progress through their doctoral capstone project, students are ultimately responsible for preparing a dissertation/doctoral study that meets the rigors of academic excellence.

Required Roles in Walden Doctoral Committees

All Walden dissertation/doctoral study committees will be comprised of three members: 1) a chair, 2) a second member, and 3) a University Research Review (URR) member.

1. Chair

The committee chairperson leads the committee members as they work with students on their doctoral capstone projects. As a result, the chairs are primarily responsible for ensuring that such projects meet all of Walden's requirements including those pertaining to content coverage, methodology, research ethics, and form and style. Moreover, they are responsible for making sure that the work of committee fulfills expectations of service to the student, the academic discipline(s), and professional field(s) of practice involved. Chairs must lead, monitor, coordinate, and assess the progress of the capstone research from start to finish.

In order for the chair to provide effective leadership of capstone committees, committee members must individually apprise the committee chairperson of their respective expertise, if not already known or any special knowledge that they may be able to contribute to the student's capstone project. Committee members must contact the committee chairperson before beginning to work with students.

Chairs must be from the program in which students are enrolled, with further specificity required from some schools. Students are expected to confirm with their advisor and/or their proposed chairperson that he or she is indeed eligible to serve in that role.

2. Second Member

The second member collaborates with chair throughout capstone completion process to provide overall guidance about the acceptability of the capstone taking into account:

- Walden capstone rubric requirements
- Norms of program and profession
- Form and style requirements

In addition, between the chair and the second member, the following functions must be fulfilled. The functions may be split between these two members, or the chair or second member could perform both roles.

Methodology Expert

- Provides feedback to student on the following:
 - Proposed research design including appropriateness for addressing the problem statement and research questions or for testing stated hypotheses
 - Selection of specific methodology
 - Selection of a sample of appropriate characteristics and size

Dissertation Timing

Doctoral students who want to graduate in a specific quarter must plan their program carefully as follows or their graduation date will be delayed:

- Begin planning for program completion at least 13 months in advance of the anticipated graduation date
- Adhere to the recommended timing for submitting forms and information

The dissertation process requires Ph.D. students to participate in a learning platform classroom. Students need to complete the process by the close of business (5 p.m. Central time) on the final business day of the quarter in which they intend to graduate. Completing the process means that the dissertation has received final approval from the chief academic officer of the university.

The following table can be used to plan the final months of the dissertation process, based on the quarter in which the student intends to graduate.

| <i>Quarter of Intended Graduation</i> | <i>Submission to Form and Style</i> | <i>Dissertation Oral Presentation</i> | <i>Final Dissertation and Rubric Submitted</i> | <i>Abstract Submitted for Chief Academic Officer Review</i> |
|---------------------------------------|-------------------------------------|---------------------------------------|--|---|
| Spring | March 1 | March 15 | April 1 | May 1 |
| Summer | June 1 | June 15 | July 1 | August 1 |
| Fall | September 1 | September 15 | October 1 | November 1 |
| Winter | December 1 | December 15 | January 1 | February 1 |

Note on commencement deadlines: Students who want to participate in the summer commencement ceremony must have their dissertation approved by the chief academic officer no later than the last business day of the spring quarter. Students who want to participate in the winter commencement ceremony must have their dissertation approved by the chief academic officer no later than the last business day of the fall quarter.

Registering for Dissertation Credits

Students enrolled in a KAM-based program will automatically be placed in SBSF 7100 - Research Forum or EDUC 8800 - Research Forum with the chair of their dissertation committee. They will remain registered in SBSF 7100 or EDUC 8800 for the duration of their dissertation process. The registrar's office will assign the appropriate dissertation credits when the final academic audit is complete.

Students enrolled in a course-based and some mixed-model programs must register for a total of 20 dissertation credits. Registration for dissertation credits takes place during the regular course registration period. After students initially register for the dissertation course, they are automatically registered for the course until the dissertation is formally approved by the chief academic officer. Students who have an approved dissertation supervisory committee may register for dissertation credits during any quarter in which they are working on the proposal and dissertation. Students who have only a committee chair may register for the dissertation course, but they will not be able to submit their proposal for review until they have an approved

EXHIBIT S

Academic Policies
Financial Services Policies
Academic Resources
Student Services

Walden University
Student
Handbook
2010–2011

WALDEN UNIVERSITY

www.WaldenU.edu/catalog

Student Responsibility in an Online Learning Environment

In an online learning environment, students and faculty are actively engaged in the learning process. In such an environment, students will encounter many viewpoints on issues that may be different than their own. Additionally, expectations for learning in a distance environment may be different from what they are used to. Therefore, students are expected to adhere to the following standards:

- Read carefully and understand the requirements as published in the course syllabus. Pay particular attention to deadlines for submitting work. Develop an alternative technology plan should the student's primary means of classroom contact be unavailable.
- Read all postings by faculty members and classmates. Being able to provide and receive critical and constructive feedback is important for one's academic success.
- Respect differing viewpoints based on cultural and intellectual differences as part of healthy intellectual exchange.
- Contact the faculty member if they (1) need additional feedback, (2) are unclear about any aspect of the course assignments, or (3) are not feeling comfortable with some other aspect of the course.
- Provide and receive critical and constructive feedback in the Discussion Board from colleagues as outlined in the posting rubric. Students should conduct themselves as they would in a classroom environment.
- Be aware of issues of confidentiality. Students should be especially careful of what they disclose about themselves or others in the virtual classroom environment.

Students should contact the Academic Advising Team if they have any questions related to their program of study or if they are experiencing difficulty in the classroom.

Faculty Services

Walden instructors are facilitators, teachers, evaluators, partners, coaches, and colleagues to their students and are the main source of guidance and support for them. Instructors also engage in a variety of scholarly, university, and community service activities. Like Walden students, they are busy professionals. Walden encourages students and instructors to gain the most from their relationship by communicating frequently.

Appointments of faculty mentors, course instructors, assessors, advisors, dissertation, doctoral study, and thesis chairs, and committee members usually last for the term of each specific assignment. However, the university recognizes that situations necessitating a change in faculty services may arise. Such situations include unexpected interruptions in instructor availability or instances when one party wishes a change in services. The university does not accept requests for changes that imply degradation of academic quality or integrity.

Unexpected interruptions: Faculty services may be unexpectedly interrupted because of an instructor's death or prolonged ill health, or because of an instructor's discontinuation of association with the university. In such cases, the student's associate dean/executive director, or designee, ensures that faculty services are restored to all affected students. The associate dean/executive director or designee communicates with affected students throughout the restoration process until appropriate assignments are finalized.

Procedure

The university discourages awarding grades of *I* (Incomplete), and faculty members are not required or obligated to do so. Faculty members should award an *I* only when a student requests a grade of *I* (Incomplete), has completed 80 percent of the course requirements, and submits a completion plan, as outlined above. Faculty members will clearly communicate their policy on incomplete grades in the course syllabi. The program director or designee or other designated faculty member within the school who conducts the academic reviews of the courses shall ensure consistency for policies on incomplete grades among courses.

Faculty Members' Accessibility

Walden expects faculty members to be reasonably accessible to students. The expectation of reasonable accessibility does not mean 24/7 access of faculty members to students. However, it does mean that students receive quality feedback on course submissions within a reasonable time frame.

Faculty Members' Contact Information

Guideline

Faculty members are required to state their Walden e-mail addresses in the appropriate area in course platforms and in faculty directories, and in correspondence with students. Faculty members may, at their discretion, offer students their contact phone numbers and street addresses.

Faculty Members' Feedback

Guideline

Faculty members are to return graded classroom assignments that are submitted by the due date to students within 10 calendar days of the assignments' due dates for coursework in classrooms, and within 14 calendar days of the due date for manuscript drafts (including KAMs, theses, doctoral studies, and dissertations) in research forums. Faculty members are to provide a grade and also written, formative feedback on assignments. Assignments that are submitted late may be graded with feedback in the time frame of the instructor. Late assignments may receive minimal feedback other than the grade. The instructor is expected to give priority to assignments submitted on time.

Faculty Members' Availability

Guideline

Faculty members are expected to be available to students outside the course discussion areas and in addition to providing substantive feedback on assignments and discussion posts. Faculty members will publish their availability to students through course syllabi, instructor information in the classroom, and/or other appropriate documents. The university suggests regular and predictable availability, such as online office hours or regular online chats.

**Chief Academic
Officer Review**

When approval from the URR reviewer has been received, the OSRS will send the abstract of the thesis to the university Chief Academic Officer (CAO) or designate. Upon CAO approval, the thesis is officially completed.

Capstone Research: Dissertation or Doctoral Study

Doctoral Committee Member Roles and Functions

Faculty members in Walden University doctoral programs who accept the duty of serving on a dissertation or doctoral study committee assume a dual responsibility of high importance. One part is service to their students; the other is service to the academic practice, discipline, and professional field to which the dissertation is related. For the first part, expectations concerning the faculty service to be performed are determined by students' needs, and by university academic policy pertaining to how these needs are to be addressed. For the second, expectations are set both by university academic policy and by policies and practice that frame acceptable work in the discipline and professional field at large.

The committee's guidance to students will be "team advice." Any written dialogue between a student and a committee member is shared within the committee. Committee members recognize that issues may be controversial, divide opinions, or otherwise cause disagreement. When conflicts arise, the committee members are obligated to restrict the discussion to only other committee members and the committee chairperson, to avoid involving students in disputes or disagreements among themselves. The committee chairperson will act as an arbitrator to resolve the situation and obtain a consensus.

Walden intends that dissertation/doctoral study committee members work as a team, directly guiding students through the proposal, research and analysis, and ultimately the final oral presentation. Although the committee members are expected to support and facilitate students' progress through their doctoral capstone project, students are ultimately responsible for preparing a dissertation/doctoral study that meets the rigors of academic excellence.

Required Roles in Walden Doctoral Committees

All Walden dissertation/doctoral study committees will be comprised of three members: 1) a chair, 2) a second member, and 3) a University Research Review (URR) reviewer.

1. **Chair**

The committee chairperson leads the committee members as they work with students on their doctoral capstone projects. As a result, they are primarily responsible for ensuring that such projects meet all of Walden's requirements including those pertaining to

Registering for Doctoral Study Credits

The final two semesters of the Ed.D. program are dedicated to the doctoral study. Registration for doctoral study credits (EDAD/EDUC 8090) takes place during the regular course registration period. Once students initially register for 8090, with their supervisory committee chair, they are automatically registered for the course until the doctoral study is formally approved by the chief academic officer. Students earn a total of 12 semester credits (i.e., 2 semesters of 6 credits per semester) for the doctoral study. Additional semesters needed for completion of the doctoral study do not earn credit.

Dissertation

The final phase of study for Walden Ph.D. students begins with the preparation of a dissertation proposal, which is affirmed in an oral presentation and then followed by the execution of a research study. Walden does not favor any particular research approach or methodology, but does require that the dissertation reflect a high level of conceptual manipulation and contribute original knowledge to the field. Through the dissertation, students demonstrate their knowledge of research design and their ability to interpret research findings, both orally and in writing.

For more details on the dissertation, refer to the dissertation information pages at the Center for Research Support.

For help writing the dissertation, visit the online [Walden Writing Center](#).

Dissertation Timing

Doctoral students who want to graduate in a specific quarter must plan their program carefully as follows or their graduation date will be delayed:

- Begin planning for program completion at least 13 months in advance of the anticipated graduation date
- Adhere to the recommended timing for submitting forms and information

The dissertation process requires Ph.D. students to participate in a learning platform classroom. Students need to complete the process by the close of business (5 p.m. Central time) on the final business day of the quarter in which they intend to graduate. Completing the process means that the dissertation has received final approval from the chief academic officer of the university.

EXHIBIT T



LaTonya Hall <latonya.hall@waldenu.edu>

Chapter 2 Review

3 messages

LaTonya Hall <latonya.hall@waldenu.edu>

Sun, Dec 7, 2014 at 1:56 PM

To: David Banner <david.banner@waldenu.edu>

Hi Dr. B,

I wanted to know if you can review what I have done so far on Chapter 2?

The updates start on page 9 and end on 24. I would like to break my literature review into two sections, with each section focusing on a research question.

The pages you are reviewing focus on the following research question. In what ways has social media changed the way followers communicate with their coworkers, bosses, and clients?

**PhD_Dissertation_092914.doc**

367K

LaTonya Hall <latonya.hall@waldenu.edu>

Tue, Dec 9, 2014 at 10:57 AM

To: David Banner <david.banner@waldenu.edu>

Hey Dr. B,

I had some system problems Sunday and I wanted to make sure you got my email below.

Thanks

[Quoted text hidden]

**PhD_Dissertation_092914.doc**

367K

David Banner <david.banner@waldenu.edu>

Tue, Dec 9, 2014 at 11:53 AM

To: LaTonya Hall <latonya.hall@waldenu.edu>

LaTonya...I cannot review it until you have a draft of all three chapters of the proposal.....

check with MyDR...there may be a way to do a draft.....

Dr.B.

[Quoted text hidden]

--

David K. Banner, PhD, Contributing Faculty
School of Management

College of Management and Technology
Walden University
100 Washington Avenue South, Suite 900
Minneapolis, MN 55401
david.banner@waldenu.edu
1-608-637-2451
www.waldenu.edu

EXHIBIT U



LaTonya Hall <latonya.hall@waldenu.edu>

Weekly discussion

4 messages

LaTonya Hall <latonya.hall@waldenu.edu>

Sun, Jan 11, 2015 at 7:31 PM

To: David Banner <david.banner@waldenu.edu>

Hi Dr. B,

I just wanted to let you know that I tried posting this evening. However, every time I tried to log in I received a runtime application error.

This week I continued with Chapter 2 and I started to work on Chapter 1. I feel like I am finally starting to see the light at the end of the tunnel with Chapter 2. Although I am sure I will have several revisions to make.

Please let me know if I should email you my week 6 quarterly plan and dissertation plan or wait until the website is back up?

Regards,
LaTonya Thornhill

David Banner <david.banner@waldenu.edu>

Sun, Jan 11, 2015 at 7:59 PM

To: LaTonya Hall <latonya.hall@waldenu.edu>

Email them to me, OK?

Dr. B.

[Quoted text hidden]

--

David K. Banner, PhD, Contributing Faculty
School of Management
College of Management and Technology
Walden University
100 Washington Avenue South, Suite 900
Minneapolis, MN 55401
david.banner@waldenu.edu
1-608-637-2451
www.waldenu.edu

LaTonya Hall <latonya.hall@waldenu.edu>

Sun, Jan 18, 2015 at 5:16 PM

To: David Banner <david.banner@waldenu.edu>

Dr. B,

I did submit my quarterly plan and updated dissertation (the only updates are to Chapter 2. I inserted my prospectus for Chapter 1 for now) to blackboard.

Here you go.

Have a great evening.

[Quoted text hidden]

2 attachments



Winter Quarter_Plan_Template_9000-2.doc

38K



WKS4-6Assgn HallL.doc

381K

David Banner <david.banner@waldenu.edu>
To: LaTonya Hall <latonya.hall@waldenu.edu>

Mon, Jan 19, 2015 at 7:45 AM

LaTonya...the Walden system can be unreliable...please submit all plans to me directly.

Also, submit the prospectus through MyDr...I cannot give you feedback unless you do that...

Dr.B.

[Quoted text hidden]

EXHIBIT V



LaTonya Hall <latonya.hall@waldenu.edu>

MGMT-9000-12,Doctoral Dissertation.2015 Summer Qtr 06/01-08/23-PT1: MyDr

1 message

David Banner <david.banner@waldenu.edu>

Mon, Jun 1, 2015 at 6:01 AM

Mentees: I have had so may requests for MyDr work lately that I have regrettably lost track of who needs what....if I haven't responded to you in a timely way, PLEASE let me know what I need to do to help...

Dr.B.