

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA**

JENNIFER WRIGHT, KELLI CALLAHAN,)
JANET HARRISON, PETE HOLUBZ and)
KELLY GARDINER,)

Plaintiffs,)

v.)

WALDEN UNIVERSITY, LLC and)
LAUREATE INTERNATIONAL UNIVERSITIES)
D/B/A LAUREATE EDUCATION INC.,)

Defendants.)

Case No.: _____

Judge: _____

JURY TRIAL DEMANDED

CLASS ACTION COMPLAINT FOR DAMAGES

Plaintiffs Jennifer Wright (“Wright”), Kelli Callahan (“Callahan”), Janet Harrison (“Harrison”), Pete Holubz (“Holubz”) and Kelly Gardiner (“Gardiner”) (together, “Plaintiffs”), by and through their undersigned counsel, bring this Class Action Complaint (“Complaint”) on behalf of themselves 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 Plaintiffs and thousands of similarly situated doctoral students who were harmed by 1) Walden’s false representations and omissions, and 2) its 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. In turn, Defendants’ false representations and omissions and Walden’s unfairly drawn-out dissertation process ensured that Walden and Laureate continued to receive

tuition and fee payments from doctoral students for an extended period well beyond the completion dates promised to Plaintiffs and other similarly situated doctoral students.

2. The bait was displayed when Walden's marketing materials, recruiters and admissions' officers misled its prospective and new students by promising that their mostly student-loan financed doctoral degrees would cost less and take a shorter time to complete than its doctoral programs were designed to take. For example, students seeking a PhD in Psychology were told it would take "three to four years" with an overall cost of \$55,000 - \$65,000 to complete the general psychology program. Ex. 1, T. Westenskow and K. Callahan Email Exchange (Aug. 18-20, 2008). However, later-released Walden/Laureate documents confirm the same psychology program was "designed" to take six years. Ex. 2, PhD Psych. Program Data, Laureate (March 6, 2015). Further, students seeking a Doctors of Business Administration ("DBA") were told it would take as little as 96 total weeks to obtain their degree. Ex. 3, Walden DBA Program Flowchart. Walden/Laureate, however, later admitted the DBA program was "designed" to take much longer: 50 months. Ex. 4, DBA Program Data (Apr. 14, 2016 data). Other programs such as the Doctor of Education (EdD) and the Doctor of Philosophy in Management ("PhD in Management") were commonly promised three years to completion, though the courses again were "designed" to, and did, take longer (52 months for the EdD program, though only 23% of students that graduated did so in that time frame, and 66 months for the PhD in Management program, though only 33% who graduated did so in that time frame). Ex. 5, EdD Program Data (April 15, 2016 data); Ex. 6, Management PhD Program Data (March 10, 2015).

3. 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 doctoral degree) would take as little as 13 or 18

months, or would only require five dissertation level courses. See, e.g., Ex. 3; Ex. 7, F. Turner Group Email (July 5, 2010); Ex. 8, DBA Residency Presentation at slides 7, 8 and 10 (Nov. 8, 2011).

4. The bait was taken once the doctoral students were committed, having paid significant money for the necessary pre-dissertation classes and course work. This is when the problems began. Instead of the promised 13 or 18-month dissertation period (or five dissertation level classes), the Walden Dissertation Process created an endless routine of hurdles and 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, a lack of oversight, poorly trained instructors, and little to no constructive feedback (or if feedback was given, inconsistent feedback), 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.

5. While students reasonably believed they were taking the necessary steps to obtain their doctoral degrees, quarters stretched into years of continuing tuition payments. Walden's promises of an affordable education became \$100,000-\$400,000 of crushing debt, while the dissertation process dragged on for years.

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

7. Though Walden and Laureate were aware that their programs were designed to last longer than what was promised, this information was withheld from Plaintiffs and other Walden doctoral students prior to their enrollment and while they were enrolled.

8. The Walden Dissertation Process ensnared thousands of students in addition to Plaintiffs. For 2014-2015, Walden allegedly awarded 462 doctoral degrees in the winter of 2014, 545 doctoral degrees in the summer of 2014, 558 doctoral degrees in the winter of 2015 and 457 doctoral degrees in the summer of 2015.¹ Upon information and belief, over 12,500 doctoral students are enrolled in Walden at any given time; however, less than 10% of that doctoral population would (or will) graduate in any given year.²

9. 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.

10. 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,

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 doctoral degrees.

having already paid tens of thousands of dollars to get “half way” through their 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 could successfully complete the Walden Dissertation Process if they just keep working.

11. It was nearly a perfect plan. Given that the Walden doctoral program was mostly online, students were isolated from 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.

12. The Walden Dissertation Process was intended to (and did) generate substantial additional revenue for Walden and Laureate by way of additional tuition and fees. The practice resulted in Plaintiffs and the members of the Class and Subclasses (defined below) paying substantially more for Walden’s doctoral educational services than promised (or reasonably anticipated by the students) and, upon information and belief, failing to graduate when they were told they would (if at all).

13. The Walden Dissertation Process caused substantial damage to Plaintiffs and the members of the Class and Subclasses. If Walden had not misrepresented or withheld the number of students that completed its doctoral programs (upon information and belief, less than 10% of the doctoral student population in any given year), *no one* would have attended Walden or made any tuition and fee payments.

14. Further, had Walden not misrepresented the timelines, costs and realities of its doctoral program and dissertation process, Plaintiffs and the members of the Class and Subclasses would not have paid for the doctoral educational services offered by Walden.

15. Instead, they relied upon Walden’s misrepresentations and omissions, and are now saddled with crippling debt, and most times, no doctoral degree.

16. Recently, Walden's doctoral programs came under government scrutiny. In October 2016, the Minnesota Office of Higher Education ("MOHE") launched a review of Walden's doctoral programs. As Sandy Connolly of MOHE told NBC News, "We have seen an increased number of complaints related to dissertations at Walden University." Ex. 9, Walden NBC News Article (Oct. 6, 2016). Elizabeth Talbot, manager of Institutional Legislation and Licensing at MOHE told NBC News that the agency was conducting "a qualitative and a quantitative analysis" of student complaints and comparing it to Walden's marketing materials. *Id.* "Is it a policy issue, a culture issue or is it something more nefarious? And we don't know until we complete the program review." *Id.*

17. Plaintiffs are now hopeful that they can get justice for their and the Class's claims in court, while Minnesota conducts its investigation to hopefully put an end to the Walden Dissertation Process.

THE PARTIES

18. Plaintiff Jennifer Wright is, and has been at all relevant times, a resident and citizen of the state of California, who attended Walden as an EdD student continuously from 2009 until late 2015.

19. Plaintiff Kelli Callahan is, and has been at all relevant times, a resident and citizen of the state of Washington, who attended Walden as a psychology doctoral student from 2009 until today, only taking two semesters off.

20. Plaintiff Janet Harrison is, and has been at all relevant times, a resident and citizen of the state of Georgia, who attended Walden as a DBA student in a “Self Design” concentration from 2008 until today.

21. Plaintiff Pete Holubz is, and has been at all relevant times, a resident and citizen of the state of Georgia, who attended Walden as a DBA student from 2010 until today.

22. Plaintiff Kelly Gardiner is, and has been at all relevant times, a resident and citizen of the state of Michigan, who attended Walden as a PhD in Public Health student from 2006 until August 2016 taking only two semesters off due to deaths in the family.

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

24. Upon information and belief, Defendant 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

25. 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.

26. This Court has personal jurisdiction over Walden because it conducts significant business in Minnesota, including upon information and belief interacting directly with Plaintiffs online from Minnesota (*e.g.*, providing an interactive portal through which students “attend” Walden),

as well as other members of the class. Walden is also currently under investigation by the state of Minnesota for the very same doctoral dissertation practices at issue in this action.

27. This Court has personal jurisdiction over Laureate because it conducts significant business in Minnesota, including receiving profits from tuition paid by Plaintiffs and other members of the Class that reside in Minnesota.

28. Venue is proper in the United States District Court for the District of Minnesota, 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

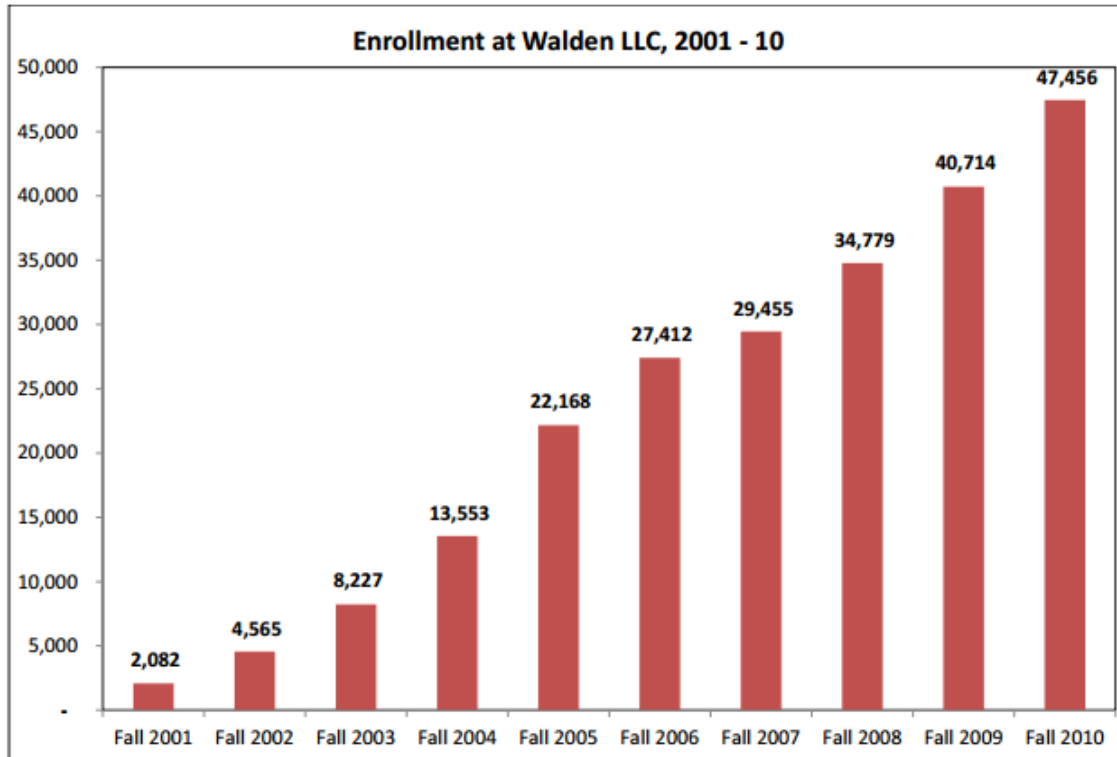
29. Walden is a for-profit, online university.

30. 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.

31. Walden offers a number of online, doctorate level degrees: Doctor of Business Administration (DBA), 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.

32. Given the number of degrees offered, and (as described 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%.



Ex. 10, 2010 Senate For Profit Report, section on Walden at p. 707.

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

34. 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.

35. Most 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.

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

36. 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 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.

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

38. 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 period.

39. Walden's maximization of its profits and marketing at the expense of student instruction is one of the factors that allows the Walden Dissertation Process to occur. In other words, by failing to use more of its doctoral students' tuition to create the infrastructure necessary to support a proper dissertation process (and instead channeling that tuition to profits and to bringing in more doctoral students), Walden has chosen to create a dissertation process that lacks oversight and the resources necessary to allow timely completion.

40. 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.

41. 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.

42. 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.

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

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

Ex. 10, 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.

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

LAUREATE

45. 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.

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 were the total doctoral student population for 2008 and 2009, then the 0.6% "percent completed" statistic is appalling.

46. This can be seen from web pages owned and operated by Laureate which display information about the inner workings of Walden. See, e.g., Ex. 2 and 4-6. Such data was only recently made publicly available, allegedly for prospective Walden students considering whether to attend Walden. These web pages, however, are under a Laureate domain (e.g., <http://programdata.laureate.net/walden/>), not a www.walden.com domain. Importantly, these Laureate webpages describe how the Walden Dissertation Process was created and implemented for Walden's doctoral programs, and how it ensnared Walden students.

WALDEN'S NEVER-ENDING PHD PROGRAM

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

48. 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 DBA Program to Take 50 Months But Promised A Shorter Timeframe

49. Focusing first on the DBA program, the first available webpage about Walden graduation rates, time frames and potential costs is from December 2012. Ex. 11, DBA Program Data (Dec. 23, 2012). While not providing much data regarding graduation rates, Walden did state it "had fewer than 10 graduates" between July 1, 2010 and June 30, 2011. Walden stated its tuition and fees cost was \$61,850 with \$0 for books and supplies.

Program Completion—This program had fewer than 10 graduates during July 1, 2010, to June 30, 2011. As a result, Walden does not disclose this information in order to protect students' privacy per U.S. Department of Education guidelines.

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	\$61,850
Books and Supplies	\$0
Room and Board	Not applicable

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

Id.

50. About five months later, on or about May 17, 2013, Walden updated this webpage to state its “On-time completion rate” was 97.1% with a \$7,000 decrease in average tuition costs to \$54,530 and books and supplies costs of \$0.

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	97.1%

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	\$54,530
Books and Supplies	\$0

Ex. 12, DBA Program Data (May 17, 2013).

51. The 97.1% 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, 2011, and June 30, 2012, who completed this program in the normal completion time.

Id.

52. Upon information and belief, the 97.1% “On-time completion rate” and “Tuition and fees” amount that Walden provided on this page was false.⁵

53. Upon information and belief, Walden provided the 97.1% “On-time completion rate” and “Tuition and fees” amount to mislead students into enrolling into its DBA program.⁶

54. 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.” *Id.*

55. Upon information and belief, the statements that doctoral students can choose a) the pace at which they can complete the DBA 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.

56. 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 DBA program.⁷

57. In 2016, the webpage format for this page changed, as did its location. Ex. 4, DBA Program Data (Apr. 14, 2016 data). Instead of being found on a Walden website, it had been moved to Laureate’s website.⁸

58. This Laureate webpage also provided additional information about the Walden DBA program. This new information showed the prior representations made by Walden in the previous two versions of this webpage were false.

59. For the first time, Walden/Laureate admitted the DBA program was “designed to take 50 months.”

Walden University
Doctor of Business Admin
 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.

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.

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.

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/doctor-of-business-administration.html> (emphasis added).

Id. Despite the program being designed to take “50 months,” Walden still used its prior undefined “normal time to completion” timeframe (whatever that was) when it calculated the “Tuition and fees” “for the entire program” – representing that a student that took “the normal time to completion” (*i.e.*, apparently 50 months) would pay \$75,931.

60. Further, Laureate admitted on its webpage that only 52% of students that graduated with a DBA completed the 50-month designed program within that time frame. *Id.* The remaining 48% of graduates took longer. *Id.*

61. The misrepresentations don’t stop there. While admitting on the Laureate webpage that Walden’s DBA program was “designed” to take 50 months, Walden’s contemporaneously offered tuition and fees page calculated a time to graduation of 10 semesters, or 3 years, 4 months.⁹

Curriculum Component	Requirements	Cost	Total*
Tuition	60 total semester credit hours	\$950 per semester hour	\$57,000
Residency Fee	Two residencies	\$1,275 each through 12/31/15 \$1,320 each beginning 1/1/16 (travel, lodging, and other expenses are additional)	\$2,640
Technology Fee	Per semester	\$165	\$1,650
		Total	\$61,290
		<i>Transfer up to 30 credits</i>	<i>\$29,325</i>
		Total With Transfer Credits[†]	\$31,965

⁹ Walden includes a “Technology Fee” of \$165 a semester and estimates it will take \$1,650 of such fees until graduation (hence 10 semesters...\$165 * 10 = \$1,650). Walden also has three semesters in a year: fall, spring and summer. <http://academicguides.waldenu.edu/academicadvising/faqs/academiccalendar>. Therefore, its calculation includes a time frame of 3 1/3 years.

Ex. 13, DBA Tuition and Fees (May 4, 2016). Walden's tuition calculation omitted the additional 1 year, 4 months of the 50 month "designed" time¹⁰ to provide prospective students a lower cost.

62. It's not unreasonable to assume that if Walden designed the course to take 50 months, then 50 months should be the "minimum time to completion." Despite this, Walden represented the DBA program as lasting a much shorter time period, as well as utilizing 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 DBA program.¹¹

63. Further, the tuition estimates on both the Laureate and Walden webpages (despite both being from April 2016) are inconsistent. On the tuition and fees page, Walden estimates it will cost \$61,290, but the Laureate page states it will cost \$75,931. Regardless, upon information and belief, both amounts are lower than the course design, and are therefore false and misleading.

64. Further, and as discussed in greater detail below, Walden made specific promises to students that its DBA program would last 96 total weeks and/or would require only five dissertation level classes. See, e.g. Ex. 3, Walden DBA Flowchart (96 weeks; five dissertation classes in 40 weeks); Ex. 8, Residency Presentation at slides 7, 8 and 10 (five dissertation classes); Ex. 7, F. Turner group email (five dissertation classes); Ex. 14, The Journey (five dissertation classes in 40 weeks). In view of the 50 month "design" time, the 96-week/five-dissertation-level-class representations were false.

¹⁰ The Laureate "designed" time webpage is dated from April 14, 2016 (and is only "updated once annually"), showing it is concurrent with the Walden tuition and fees page.

¹¹ 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.

65. What should not be lost is that the above statistics such as the “normal time to completion” and estimated tuition are allegedly calculated from students that graduated. The clear 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 Designed its PhD in Psychology Program to Take 72 Months But Promised A Shorter Timeframe

66. Turning to Walden’s PhD in Psychology program, the first available webpage about Walden graduation rates, time frames and potential costs is from December 2012. Ex. 15, Psych PhD Program Data (Dec, 22, 2012). While not providing much data regarding graduation rates, Walden did state it had an “On-time completion rate” of 58.3% between July 1, 2010 and June 30, 2011, with tuition and fees cost of \$73,040-102,270 and \$3,600-5,500 for books and supplies.

Program Completion—The program completion rate is the percentage of students who graduated between July 1, 2010, and June 30, 2011, 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	58.3%

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	\$73,040-102,270
Books and Supplies	\$3,600-5,500
Room and Board	Not applicable

Id.

67. The 58.3% 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, 2011, and June 30, 2012, who completed this program in the normal completion time.

Id.

68. Upon information and belief, the 58.3% “On-time completion rate” and “Tuition and fees” amount that Walden provided on this page were false.

69. Upon information and belief, Walden provided the 58.3% “On-time completion rate” and “Tuition and fees” amount to mislead students into enrolling into its Psychology PhD program.

70. For this webpage, and identical to the DBA program webpage (as well as all other doctoral degree pages), 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.”

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

72. 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 Psychology program.

73. About seven months later, on or about July 13, 2013, Walden updated this webpage to state its “On-time completion rate” was a range from 49.3-72.9% with tuition costs of \$71,510-100,655 and books and supplies costs of \$3,816 to 5,830.

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	49.3-72.9%

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	\$71,510-100,655
Books and Supplies	\$3,816-5,830

Ex. 16, Psych PhD Program Data (July 13, 2013).

74. The 49.3-72.9% 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, 2011, and June 30, 2012, who completed this program in the normal completion time.

Id.

75. Besides not making sense, upon information and belief, the 49.3-72.9% “On-time completion rate” and “Tuition and fees” amount that Walden provided on this page was false.

76. Upon information and belief, Walden provided the 49.3-72.9% “On-time completion rate” and “Tuition and fees” amount to mislead students into enrolling into its PhD in Psychology program.

77. In 2014-2015, the webpage format for this page changed, as did its location. Ex. 2, PhD Psych. Program Data, Laureate (Jan. 2015 data). Instead of being found on a Walden website, it had been moved to Laureate's website.¹²

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

79. For the first time, Walden/Laureate admitted the PhD in Psychology program was "designed to take 72 months."

Walden University
PhD in Psychology
 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

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 *%.

Id. Despite the program being designed to allegedly take "72 months," Walden still used its prior undefined "normal time to completion" timeframe (whatever that was) when it calculated the "Tuition and fees" "for the entire program" – representing that a student that took "the normal time to completion" (*i.e.*, apparently 72 months) would pay \$67,610...a \$10,000-\$40,000 drop in price despite taking six years. Upon information and belief, these amounts were false.

¹² 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-psychology.html> (emphasis added).

80. Upon information and belief, had the “normal time to completion” been calculated from the “designed” 72-month time, tuition would have exceeded \$150,000

81. Further, only 44% of students that graduated with a PhD in Psychology completed the 72-month designed program within that time frame. *Id.* The remaining 56% of students *that graduated* took longer. *Id.*

82. It’s not unreasonable to assume that if Walden designed the course to take 72 months, then 72 months should be the “minimum time to completion.” It’s clear, however, that from previous calculations, Walden utilized a still undefined and likely false “minimum time to completion” calculation. Walden provided this false information to mislead prospective students into enrolling in its PhD in Psychology program.

83. Also, as discussed in greater detail below, Walden’s specific promises that its PhD in Psychology program would take only 3-4 years were obviously false in view that the program was designed to take 6 years.

84. Further, this Laureate webpage admits that only 44% of students in 2012-2013 completed the program within the “normal” 72-month timeframe. The “normal time to completion” then cannot be as low as 72 months then, it must be something longer.¹³


85. 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.

¹³ 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 less (like 44%) would not be normal.

Walden University

PhD in Psychology

Program Level - Doctoral degree
Program Length - 66 months



PRINT

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

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 *%.

Ex. 17, PhD in Psychology, Program Data (current). While the PhD in Psychology program from 2014 through early 2016 was allegedly “designed to take 72 months,” inexplicably, the mid-to-late 2016 program was shortened so that it now allegedly was “designed to take 66 months to complete.” *Id.* This despite the most recent webpage reflecting an even lower rate of students (only 21%) completing the 66-month program. Moreover, despite an eight-month reduction in “designed” completion time, the represented tuition and fees increased from increased almost \$20,000. Further, the \$86,987 tuition was calculated from a fictional “normal time to completion” of likely three years. Had the “normal time to completion” been calculated from the “designed” 66-month time, it would have exceeded \$100,000. Even further, the “normal completion time” could not be 66 months, as only 21% 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 66 months.

86. The statements on this page were obviously false, with intent to mislead prospective students to enroll in Walden’s PhD in Psychology program.

87. What should not be lost is that the “normal time to completion” is calculated from students that graduated. Upon information and belief, the clear 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 Designed its EdD Program to Take 52 Months But Promised A Shorter Timeframe

88. For years, Walden misrepresented to prospective and current students that the EdD program would take its students three years. For example, its 2005 Viewbook (also used for at least 2006 enrollment) states, “The Ed.D. program takes three years to compete.” Ex. 18, 2005 Viewbook (excerpts) at 6. Further, students in at least 2010 and 2011 completed documents for their instructors entitled, “My AL/CIA/HEAL/HEL/SPED/TL Ed.D. Timeline,” which calculated EdD three year completion deadlines for the EdD program and six EdD specializations. Ex. 19, EdD Timeline. Also, as discussed below, promises of three-year programs were made at multiple events attended by Walden recruiters.

89. These representations were false, as Walden designed the EdD program to take 52 months.

90. The first available webpage about Walden graduation rates, time frames and potential costs is from January 2013. Ex. 20, EdD Program Data (Jan. 19, 2013). While not providing much data regarding graduation rates, Walden did state it had a 59.2% “on time completion rate” from July 1, 2010 through June 30, 2011. Walden stated its tuition and fees cost was \$57,945-\$62,565 with \$0 for books and supplies. *Id.*

Program Completion—The program completion rate is the percentage of students who graduated between July 1, 2010, and June 30, 2011, 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	59.2%

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	\$57,945-62,565
Books and Supplies	\$0

91. The 59.2% 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, 2011, and June 30, 2012, who completed this program in the normal completion time.

Id.

92. Upon information and belief, the 59.2% “On-time completion rate” and “Tuition and fees” amount that Walden provided on this page was false.

93. Upon information and belief, Walden provided the 59.2% “On-time completion rate” and “Tuition and fees” to mislead students into enrolling into its EdD program.

94. 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.” *Id.*

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

96. 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 EdD program.

97. In 2016, the webpage format for this page changed, as did its location. Ex. 21, EdD Program Data (Apr. 15, 2016 data). Instead of being found on a Walden website, it had been moved to Laureate’s website.

98. The Laureate website also provided additional information about the Walden EdD program. This new information showed the prior representations made by Walden in the previous version of this webpage were false.

99. For the first time, Walden/Laureate admitted the EdD program was “designed to take 52 months.”

[Go back to Walden's Doctor of Education \(EdD\) program](#)

Walden University
Doctor of Education
Program Level - Doctoral degree
Program Length - 52 months

COST

Q. How much will this program cost me?*

A. Tuition and fees: \$59,731
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

SUCCESS

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

A. The program is designed to take 52 months to complete. Of those that completed the program in 2014-2015, 23% finished in 52 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 *%.

Id. Despite the program being designed to take “52 months,” Walden still used its prior undefined “normal time to completion” timeframe (whatever that was) when it calculated the “Tuition and fees” “for the entire program” – representing that a student that took “the normal time to completion” (*i.e.*, apparently 52 months) would be \$59,731.

100. Further, only 23% of students that graduated with an EdD completed the 52-month designed program within that time frame. *Id.* The remaining 77% of graduates took longer. *Id.*

101. The misrepresentations don’t stop there. While admitting on the Laureate webpage that Walden’s EdD program was “designed” to take 52 months, Walden’s contemporaneously¹⁴ offered tuition and fees page calculated a time to graduation of 12 quarters, continuing its misrepresentation of the EdD program as a three-year program.¹⁵

¹⁴ The EdD Laureate page contained data from April 15, 2016. Ex. 21. The EdD Tuition and Fees page from Walden’s cite is date April 12, 2016. Ex. 22.

¹⁵ Walden includes a “Technology Fee” of \$125 a quarter and estimates it will take \$1,750 of such fees until graduation (hence 12 quarters...\$125 * 12 = \$1,750). Twelve quarters equals a time frame of 3 years.

Doctor of Education

Curriculum Component	Requirements	Cost	Total*
Tuition	76 total quarter credit hours	\$590 per quarter hour	\$44,840
Residency Fee	One residency	\$925 (travel, lodging, and other expenses are additional)	\$925
Technology Fee	Per quarter	\$125	\$1,750
		Total	\$47,515
		<i>Transfer up to 38 credits</i>	<i>\$22,670</i>
		Total with Maximum Transfer Credits[†]	\$24,845

Ex. 22, EdD Tuition and Fees (April 12, 2016).

102. Walden’s tuition calculation omitted the additional 18 months of the 52 month “designed” time¹⁶ to provide prospective students a lower cost.

103. The tuition estimates on both the Walden and Laureate pages also are inconsistent. On Walden’s tuition and fees page, Walden estimates it will cost \$47,515 in tuition and fees, while the Laureate page states it will cost \$59,731. Regardless, upon information and belief, both estimates are lower than the course design, are therefore false. Both misrepresentations were made by Walden/Laureate in the hopes of students relying upon them to enroll in Walden’s EdD program.

104. The above materials show that despite designing its EdD program to take 52 months, Walden promised a much shorter time frame (*e.g.*, twelve quarters). Walden knowingly made these false statements with the hopes that prospective students would rely upon them and enroll in its EdD program.

¹⁶ The Laureate “designed” time webpage is dated from April 15, 2016 (and is only “updated once annually”), showing it is concurrent with the Walden tuition and fees page.

105. It's not unreasonable to assume that if Walden designed the course to take 52 months, then 52 months should be the "minimum time to completion" (although again, only 23% of students who graduated did so in 52 months...so the "minimum time to completion" should be longer than 52 months). Walden, however, utilized false and misleading tuition and fees calculations based on three years or less for its "minimum time to completion" calculation. Walden provided this false information to mislead prospective students into enrolling in its EdD program.

106. Further showing the dishonesty of Walden, in a 2014 submission to MOHE, Walden provided the "Number of Months to Complete the Ed.D. Higher Education and Adult Learning (HEAL) Program" since 2009. Ex. 23, Walden Ltr to MOHE (June 20, 2014). In contrast to the Timeline document provided to at least 2010-2011 EdD students (including EdD HEAL students) which calculated a three-year graduation rate (Ex. 19, above), Walden's letter to MOHE confirmed that only *two* EdD HEAL students from 2009-2014 graduated in three years or less.

**Number of Months to Complete the Ed.D. Higher Education and Adult Learning (HEAL) Program:
Graduates since 2009**

Months	# of Grads	% of Grads
35	2	2%
39	5	4%
41	1	1%
43	18	16%
45	3	3%
47	18	16%
49	8	7%
51	19	16%
53	6	5%
55	13	11%
57	3	3%
59	16	14%
63	2	2%
65	2	2%
TOTAL	116	100%

Average # of Months

50 months (or roughly 4 years)

Id. Worse, Walden admitted to MOHE that the average time to graduation was “50 months.” *Id.*

This again confirms that not only were Walden’s promises of faster timelines false, it was aware such promises were untruthful.

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

107. Walden and Laureate’s manipulation of tuition rates and times to completion were not confined to just the named-Plaintiffs’ doctoral programs. Despite blanket statements of estimates based on “minimum time to completion” and “normal completion time” across Walden’s doctoral programs, the clear majority were “designed” to take longer.¹⁷

108. 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

¹⁷ A detailed discussion of the PhD in Management is provided in *Thornhill v. Walden, et al.*, Case: 2:16-cv-00962-ALM-KAJ (S.D. Ohio 2016).

complete,” although only 27% of the 2012-2013 graduates completed the program within that time. Ex. 24, Laureate PhD in Health Services webpage (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.

109. 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. 25, 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.

110. 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. 26, Laureate PhD in Public Policy and Administration webpage (April 15, 2016 data). 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.

111. 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. 27, 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. Ex. 28, Laureate PhD in Public Health webpage (March 6, 2012). 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.

112. 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. 29, Laureate PhD in Public Health webpage (April 15, 2016 data). Further, regardless of 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 OF TUITION COSTS AND TIMES TO GRADUATE BY WALDEN AND ITS RECRUITERS WERE WELL BELOW THE “DESIGN” OF EACH PROGRAM

113. The Defendants’ plan to extract as much money from doctoral students as possible began in recruiting and enrollment.

114. Despite the actual “design” of each doctoral program, Walden recruiting and enrollment employees repeatedly touted shorter time frames for completion of the programs and its dissertation process.

115. Walden recruiters make these verbal promises on the phone when speaking to prospective students as well as at public events such as a Back to School rally in Barstow, California.

116. Later, such promises were confirmed by Walden employees in the enrollment office.

117. While most promises were verbal, some promises by recruiters and the enrollment office were in writing. *See, e.g.*, Ex. 1, Email Exchange between T. Westenskow and K. Callahan (Aug. 18-20, 2008); Ex. 7, F. Turner Group Email (July 5, 2010).

118. Such verbal and written representations were made specifically to Plaintiffs in this action as described in greater detail below.

119. Representations of a faster timeline were not made to just the named Plaintiffs. 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 their doctoral program would take only three years (for a program Walden/Laureate would later admit was designed to take 52 months though only 23% of those that graduated did so in that time frame).¹⁸ Despite that, only one of those educators received her doctorate in the time promised.

¹⁸ This is the identical promise made to Plaintiff Wright at a Barstow rally (as described below).

Vette S. said
364 days ago

Thank goodness someone has started 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 University would "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 revisions 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/>).

120. 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.

121. Taken together, the 2012 Senate Report, the history of Plaintiffs 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 complete a Walden doctoral degree 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, would be false and misleading.

122. Instead, Walden and Laureate should tell prospective students they’d be lucky to obtain a doctoral degree, let alone obtain a degree in a reasonable time frame.

THE TRAP OF THE WALDEN DISSERTATION PROCESS CONTINUES AFTER THE STUDENTS ENROLL

123. Once doctoral students enrolled in Walden, the false promises continued.

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

125. The Walden Student Handbook reflects that the dissertation process could 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. 30, Excerpts, 2013-2014 Walden Student Handbook at 273 (December 2013), available at <http://catalog.waldenu.edu/content.php?catoid=117&navoid=32382>, and Ex. 31, 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>.

126. Further, as stated above, it was common for Walden to represent that the dissertation process could be completed in 13-18 months or after five dissertation level classes (*i.e.*, five

semesters). For example, numerous DBA program materials confirm just five 9000 level dissertation classes are required to complete the program. Ex. 3, Walden DBA Flowchart; Ex. 7; F. Turner Group Email (July 5, 2010); Ex. 8, DBA Residency Presentation at slides 7, 8 and 10; Ex. 14, The Journey. The psychology doctoral degree and the counseling and organizational psychology specializations were touted as requiring only 30 credits. Ex. 32, 2010-2011 Walden Catalog (excerpts) at p. 339, 344, 350. For these programs, 30 credits equate to five terms of a 6-credit course. *Id.* The EdD program also calculated time to completion of the dissertation process of about 16-18 months. Ex. 19, EdD Timeline.

127. After students exceeded the 18 months/five dissertation classes, Walden continued the trap by encouraging them the finish line is in sight. One example can be seen in a March 5, 2013 email sent to DBA students who had gone past the promised five dissertation classes. The letter teases “Hello future doctor” and includes false hope that “you can complete this year!!!”:

Hello future doctor,

You are receiving this message as you have completed 5 sessions of 9000. I wanted to alert you to some resources that might be helpful as you complete your DBA program this year. I really like the sound of Dr. and I am confident this can be an accomplishment that you can complete this year!!!

Ex. 33, DBA Email to J. Harrison (March 5, 2013). Walden made such statements knowing enticements were necessary to keep students enrolled in the program beyond its promised end dates.

HOW THE WALDEN DISSERTATION PROCESS TRAP WAS SPRUNG

128. Doctoral degrees, including Walden’s doctoral degrees, differ from 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 to complete the dissertation.

129. To complete the dissertation, students must consult and seek the approval of faculty and institutional entities at Walden. Because of this, it is imperative that students work closely with the faculty members, whose approval is necessary for the advancement of the dissertation through its many stages.

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

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

132. At each stage of the process, the student must gain approval of the dissertation supervisory committee chair (“chair”) and a supervisory committee member (“member”). Approvals must be sought first from the chair, then the member. In this line of approvals, if the member does not issue an approval, the student must begin the process again with the chair before approaching the member again.

133. Given the need for consecutive approvals from multiple Walden personnel for each stage of the dissertation process, timely responses by the chair and member are required to advance the process.

134. 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 semester/term (and for their remaining semesters/terms at Walden). Despite this, the doctoral students will still pay full tuition.

135. As discussed above, it was commonly promised that students would only need five dissertation level classes (or 13-18 months of dissertation level classes) to graduate. See, e.g., Ex. 3, 7, 8, 14, 19, 32, 34.

136. 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.

137. After determining a topic and drafting the Premise, the student must nominate the dissertation supervisory committee. The dissertation supervisory committee has two members: the chair and 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 chair and member accept their nominations, they must approve of the Premise before the student can advance.

138. 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. 31, Excerpts, Dec. 2011 Student Handbook at 174 (emphasis added); *See also* Ex. 30 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. 31 at 174; Ex. 30 at 259.

139. The Prospectus (the second step in the dissertation process) is meant to build on the Premise and serve as the foundation of the Proposal (the third step in the dissertation process). The goal of the Prospectus is to develop a plan for the Proposal and ultimately outline the basic structure of the dissertation. Like the Premise, the Prospectus must be approved by both the chair and member before proceeding to the Proposal.

140. The Proposal (third step of the dissertation process) 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 chair and member to complete the Proposal. As the Handbook promises, the chair and member are to “guide” their students “through the proposal.” *Id.*

141. In addition to approval by the dissertation supervisory committee chair and member, the Institutional Review Board (“IRB”) must also approve the Proposal. This adds a third level of approvals, and like with the member, if the IRB does not approve the Proposal (even if just for minor, grammatical reasons), instead of the student going back to the IRB with edits to the Proposal, he or she must begin again with the chair, then (if approved by the chair) to the member, and then (again, if approved) finally to the IRB again. It is also not uncommon for the IRB to disagree with the student’s Proposal or sometimes the student’s topic in its entirety. Thus, regardless of whether the prior chair and member had approved the student’s topic (for years in some cases), Premise, Prospectus and Proposal, the student must now begin the process anew to address the IRB’s concerns. And the student does not address the concerns directly to the IRB, but rather, to the chair...then (if approved) the member...and finally (if approved) the IRB again.

142. After/If 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.

143. The chair and member must approve the completed dissertation, which is then submitted to the University Research Review (“URR”) for approval. This again adds another third level of approval, and again, if the URR does not approve of the dissertation (even if just for minor, grammatical reasons), instead of the student going back to the URR with edits to the dissertation, he or she must begin again with the chair, then (if approved by the chair) to the member, and then (again, if approved) finally to the URR again.

144. It is also not uncommon for the URR to disagree with the student’s dissertation in its entirety. As a result, regardless of whether the prior chair, member and IRB approved the Proposal and chair and member approved the dissertation, the student must now begin the process anew to address the URR’s concerns. And, like with the IRB, the student does not address the concerns directly to the URR, but rather, to the chair...then (if approved) the member...and finally (if approved) the URR again.

145. After/If approval is received from the URR, the student must orally defend the dissertation.

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

WALDEN SYSTEMATICALLY PROLONGS THE DISSERTATION PROCESS

147. With so many levels of approval required (and the need to constantly restart the approval process), the dissertation process described above is designed to maximize tuition and costs for Walden. Beyond this, the dissertation process is plagued by a complete disregard for Walden’s promises and policies through which Walden creates a seemingly endless process that drags on for term after term, year after year for students.¹⁹ This disregard by Walden and Laureate is

¹⁹ Walden also offers a Knowledge Area Module “KAM” option in its doctoral programs. The same review problems that arise during the dissertation process also arise with KAMs.

intentional. Further, because Walden funnels most of its students' tuition into marketing and profits, insufficient funds are left to properly manage the students or create sufficient infrastructure to handle an efficient dissertation process. However, this works in Walden's favor, because this ensures numerous delays for the students in which they will pay additional tuition and costs.

148. All together, the above shows Walden and Laureate's knowing and intentional scheme to unduly prolong the dissertation process to extract additional tuition and costs from its students to increase Walden and Laureate's profits, at the expense of those students it is supposed to be educating.

149. First, the process for obtaining a chair and member is time consuming and difficult, based on obsolete and outdated materials provided by Walden. Making matters worse, for some students retaining the chair and member throughout the entire dissertation process is an additional challenge.

150. Walden instructs students to consult the Faculty Expertise Directory (which is just an outdated spreadsheet) to find Walden faculty members capable of serving on the dissertation supervisory committee as either chair or member. The dissertation supervisory committee must feature an expert on the student's content and an advisor on methodology. To obtain a 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.

151. However, the chair and member nomination process does not run as smoothly as Walden represents to its students. First, students spend multiple months attempting to obtain the agreement of a faculty member to serve as chair or member. Students blindly submit requests to

faculty members, and most times do not hear back as either the Faculty Expertise Directory is outdated or the faculty members simply do not wish to respond.

152. Even worse, once the faculty members agree to serve in the roles of chair and member, they sometimes quit, are fired, or simply stop responding to the student. Upon information and belief, retention of chairs and 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 would rather spend its money on marketing to bring in additional doctoral students).

153. When a Walden student's member or chair chooses to quit his or her role on the committee, the student essentially is required to start the dissertation process from scratch. The student is forced to locate an additional faculty member to serve in the vacated role. This requires the student to consult the same outdated list of faculty members, hoping to receive a positive response (or any response) from his or her inquiries. However, even if the student locates a new faculty member to serve in the role, the new chair or member may (and often does) disagree with the student's Prospectus, Proposal or dissertation. As a result, regardless of whether the prior chair or member approved the Prospectus, Proposal or dissertation, the student must now begin the process anew and address the new chair or member's concerns.

154. 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. 31, Excerpts, 2010-2011 Handbook at 123 (emphasis added); Ex. 30, Excerpts 2013-2014 Handbook at 214-215.

155. As stated above, Walden repeatedly broke this promise, in that once chairs or members left, Walden forced its students to find replacements. This delay always benefitted Walden, because any delay to the dissertation process led to additional tuition payments (including costs for books, residency, technology fees, etc.).

156. Further, upon information and belief, the turnover rate of chairs and members is high. This high turnover results in Walden students being caught in a cycle of finding 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. Upon information and belief, and due to a lack of supervision by Walden, most Walden doctoral students experience a loss of a chair or member at least once (and usually more times) during their dissertation.

157. With its lack of resources and infrastructure (again due to maximizing profits and marketing at the expense of spending tuition on its students), chairs and members are also often unsupervised by Walden in their interactions with students leading to numerous problems, all of which extend the dissertation process. For example, Walden students depend on the 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.

158. The lack of supervision by Walden allows the chairs and members great latitude to shirk their duties, either by giving no or inconsistent feedback, or by simply giving students a “satisfactory” grade term after term regardless of the quality of the work product reviewed so that the student can continue their enrollment and payment of tuition.

159. Internal Walden emails admit to this lack of supervision. For example, in May 2015, the Walden Leadership Team highlighted its lack of oversight for all prior years in view that its dissertation chairs continually awarded students “satisfactory” grades in dissertation courses even when students allegedly made little or no progress:

The leadership team is very concerned that some students have been awarded a grade of satisfactory for assignments and for the overall course grade when little or no progress was made. Such students incur a heavy debt burden and are often dissatisfied and problematic.

Ex. 35, Harrison Email (May 28, 2015). With this email, Walden admitted its unsupervised and flawed dissertation process resulted in students “incur[ring] a heavy debt burden.” The callous tone of this email is shocking when it’s noted that Walden was “concerned” not with the students admitted “heavy debt burden”; rather, it was concerned that these students were “often...problematic.” *Id.*

160. Due to a lack of supervision by Walden, many of the chairs and members also do not have the proper educational backgrounds to understand their students’ research. Often, this is not found out by the students until many months (if not years) into the dissertation process. When it is, the students are again forced to replace their chairs/members, risking yet again receiving a new committee member who might disagree with the students’ work, and potentially requiring them to start over.

161. Unbelievably, in some cases, due to a lack of supervision, chairs/members require students to pay for third-party editors, some of whom work for companies created by the very

same chairs/members. This results in the chair/member receiving additional money, and creates a conflict of interest, where if students refuse to use the chair/member's outside editor, they fear retribution in the form of an "unsatisfactory" grade or the withholding of approval at some stage in the process.

162. Walden also has specifically implemented a formal policy which states that the chair and member must respond to requests from students for commentary, feedback, or even formal review, within 14 days.

163. However, due to a lack of supervision and as part of the Walden's scheme, Walden faculty routinely do not abide by the 14-day response requirement. This is especially frustrating for Walden students because they literally cannot progress without the approval of the chair and member. Thus, it causes significant delays in moving forward with, and the completion of, the dissertation process.

164. Upon information and belief, most Walden doctoral students experience a breach of the 14-day response period at least once (and usually many more times) during their dissertation. These breaches unnecessarily prolong students' efforts to obtain their degrees, and results in students having to extend their enrollment in their respective dissertation course and pay additional tuition (including costs for books, residency, technology fees, etc.).

165. In fact, even a 14 day "response" time is too long. 14 days to receive input comprises 1/6 of a Walden term. 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 or member just three times in a quarter, that would amount to a loss of half of a quarter.

166. Further, delays of time caused by a lack of supervision would necessitate substantive changes to the students' dissertation. For example, dissertation references could only be utilized if they were less than five years old. However, through chair and member delays, the already-approved references would age beyond the five-year requirement and need to be discarded. This required the student to spend time and additional tuition to identify and utilize new references. For programs such as the PhD in Psychology program (a program "designed to take 72 months"), this could mean all of students' references would become outdated at some point, and need to be replaced solely due to program design and through no fault of the students.

167. Walden's failure to dedicate sufficient resources, oversee and regulate the supervisory committee program thus would unnecessarily prolong students' efforts to obtain their degrees, and result in students having to extend their enrollment in their respective dissertation course and pay additional tuition (including costs for books, residency, technology fees, etc.).

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

169. Walden, as experienced by Plaintiffs and the Class and Subclass members, is intentionally and deliberately using its dissertation process as a means of improperly extracting tuition and generating revenue. Walden has intentionally and knowingly created 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 has created 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 these delays: 1) quit the program, thereby essentially throwing away the time and money expended (as most, if not all, of their credits are not transferable to other institutions) and accelerating the start of the payback period; or 2) continue to enroll in additional quarters with the hope of completing the program someday before they run out of money.

PLAINTIFFS' EXPERIENCES AT WALDEN

Plaintiff Kelli Callahan

170. Plaintiff Kelli Callahan is a 25-year forensic science and criminal justice professional. She has devoted her adult life to her professional career. She maintains numerous memberships in professional organizations, and possesses a Master of Forensic Sciences from National University, a B.S. in Psychology from Boise State University, and a B.A. in Anthropology from Boise State University. She is also a published author and held peace officer status in three states.

171. Plaintiff Callahan enrolled at Walden in 2009 in the PhD in Psychology program with an emphasis in Research. She quickly switched to an emphasis in Health Psychology once she learned the Research emphasis was being phased out.

172. Plaintiff Callahan chose Walden because on August 19, 2008, Todd J. Westenskow, Enrollment Advisor for the School of Psychology, informed Plaintiff Callahan that a PhD in Psychology would cost \$55,000 plus books and the cost of residencies.

Hello Kelli,

Thank you for your response. I am glad to help in any way I can.

The PhD in Psychology programs in either Educational Psychology or Organizational Psychology are 121 quarter credits and require 20 days of residency. **The overall tuition and residency fees for either program would be approximately \$55,000, plus books and travel/lodging for the residencies.**

Ex. 1, Callahan Email Exchange (Aug. 19-20) (emphasis added).

173. This information was confirmed again by Westenskow on August 20, 2008, when he informed Plaintiff Callahan that the PhD in General Psychology program would only take “three to four years...with an overall cost of \$55,000-\$65,000.” *Id.*


174. Westenskow also repeatedly confirmed that the dissertation process would last only five dissertation classes as well.

175. Plaintiff Callahan relied upon these representations in choosing Walden and enrolling in its Psychology PhD program.

176. These representations, however, were false. Laureate’s Program Data for Walden’s PhD in Psychology program from March 6, 2015 explains the PhD in Psychology program was “designed to take 72 months,” although only 44% of students *who graduated* would do so within that time frame.

PhD in Psychology

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

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 *%.

Ex. 2, PhD Psych. Program Data (March 6, 2015).

177. Given Walden was in possession of this data, Walden's promises of anything shorter were knowingly false, and made purposefully for prospective and current students to rely upon.

178. Had Plaintiff Callahan and other PhD in Psychology students known that the program was designed to take 72 months, they would not have enrolled in Walden's PhD in Psychology program.

179. Further, Plaintiff Callahan was provided a document called "Completion Requirements" in 2009, which she used as a checklist when completing her program requirements. Ex. 34, Completion Requirements (Aug. 5, 2009). Importantly, this document confirmed on both pages 1 and 2 that the dissertation process required only 30 credits. *Id.* Since each dissertation class was six credits, this meant five classes would result in completion of the dissertation process. Despite these promises, Plaintiff Callahan has taken 17 dissertation classes.

180. Walden's representations about the estimated costs of receiving a PhD in Psychology have also turned out to be false. The length of Plaintiff Callahan's time at Walden is proof that the promises made by Walden were false. Plaintiff Callahan has incurred \$267,181.66 in debt (including interest for which she continues to incur an additional \$36 a day) during her 7 ½ years at Walden for a program she was promised would end in 3-4 years at a cost of \$55,000-65,000.

181. Plaintiff Callahan is a straight-A student with a 4.0 grade point average at Walden.

182. Despite this, she, like many others Walden students, has been stuck on her dissertation.

183. Between the summer of 2009 and now, she completed the following doctoral-level courses: Foundations for Graduate Study, History & Systems of Psychology, Statistics 1, Biopsychology, Statistics II, Social Psychology, Research Design, Tests and Measurement, Psychology and Social Change, Ethics Standards Prof Practice, Psychopharmacology, Stress and

Coping, Clinical Neuropsychology, Psychoneuroimmunology, Qualitative Analysis, Health Psychology, Diagnosis and Assessment, Behavioral Nutrition and Writing a Literature Review.

184. Upon completion of her required doctoral-level courses (for which she received straight As), Plaintiff began her dissertation on September 4, 2012.

185. Plaintiff paid between \$2,260 and \$3,050 per quarter (every 11 weeks).

186. Plaintiff also completed three residency courses, obtaining the necessary satisfactory grades to advance from each of those courses. For each residency course, Plaintiff paid approximately \$1,500 in total (\$925 residency tuition plus technology fees for two residencies, \$1,120.00 residency tuition plus technology fees for third residency).

187. Wanting to be sure that she was using her time at Walden efficiently, Plaintiff started working on her Prospectus on September 4, 2012. Her Prospectus was approved on February 20, 2013 by her (former) supervisory committee chair and methodologist Dr. Silvia Bigatti and content expert and committee member Dr. Tracey Mallett.

188. On February 17, 2016, Dr. Tom Diebold agreed to be her dissertation supervisory committee member and methodology expert, to complete her supervisory committee.

189. Plaintiff Callahan then advanced on to her Proposal, which despite being a 4.0 GPA student, she has been working on since.

190. Over the course of Plaintiff'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 the way of its faculty and her. In other words, Plaintiff 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 revenue from its doctoral students.

191. For example, Walden promises students in the Student Handbook that they are to receive feedback on any submitted dissertation draft within two weeks. Walden failed Plaintiff Callahan in this regard on numerous occasion. In one instance, Plaintiff Callahan did not receive input for eight weeks and two days. In receiving a tuition waiver, Walden admitted the delay was caused by the MyDR system.

The School of Psychology Academic Petition Committee reviewed this petition, and has approved a tuition waiver of 6 weeks for the Winter 2016 quarter, due to delays with the MyDr system.

Ex. 36, Callahan Email Exchange (May 23, 2016).

192. While granted a tuition waiver, the fact that Walden requires students to initiate such reimbursement requests (rather than performing such reimbursements automatically or at the request of the chairs/members who were aware of the missed two-week deadlines) shows an intentional lack of oversight.

193. Plaintiff Callahan suffered additional delays and additional tuition (including costs for books, residency, technology fees, etc.) due to Walden's failure to oversee its dissertation committee chair and members as well.

194. For example, Plaintiff Callahan replaced her first methodologist and member Dr. Silvia Bigatti with a second methodologist and member, Dr. Mary Devitt, in May of 2014. This arose because Dr. Bigatti gave Plaintiff Callahan an unsatisfactory grade. Plaintiff Callahan fought this grade administratively through Walden and had the grade subsequently reversed. After this experience, Plaintiff Callahan insisted on another chair as Dr. Bigatti became difficult to work with. Though agreeing to the change, Walden required Plaintiff Callahan to find a replacement member and methodologist by herself.

195. As described above, trying to find a replacement chair or member occurs often with Walden students, and is accomplished by using the outdated Faculty Expertise Directory through

which students are required to randomly and blindly email Walden instructors requesting that they serve on our dissertation committees.

196. Forcing students to find replacement chairs with such outdated resources causes wasted time and tuition, especially when most of the alleged potential replacements on the list ignore such requests.

197. After Plaintiff Callahan secured her second member and methodologist, Dr. Devitt went missing for several months marked by no correspondence with her students. Plaintiff Callahan was again forced to reach out to Walden about these issues.

198. On June 29, 2015, Plaintiff Callahan received an email from Elisha Galaif, Senior Research Coordinator from Walden University, who stated:

Hello. Dr. Devitt, your current 2nd member has resigned from Walden effective next term so you will need to find a new 2nd member. Please use the attached list to do so.

Ex. 37, Callahan Email Exchange (June/July 2015). This email was sent only after repeated correspondence by Plaintiff Callahan to Walden informing them that her member and methodologist had disappeared and was not responding to emails or phone calls.

199. By this time, Plaintiff Callahan's former content expert and committee member, Dr. Tracey Mallett had assumed the role of replacement chair, but Plaintiff was still left with attempting to find another methodologist.

200. Plaintiff Callahan spent months attempting to replace her, which culminated in the below email from September 13, 2015 to her chair expressing her concerns about being unable to find a replacement:

Hi Dr. M.,

I wanted to solicit your assistance in trying to locate a new methodology expert since my last one quit Walden a few months back. I have been utilizing the list as

provided by the research department and have all but exhausted this list of individuals to date. Most do not respond to emails or indicate that they are not available for a committee position at the current time. I also contacted the research department a while back to express my concerns and they merely said to just contact my department chair.

The problem however is that I previously contacted the department chair back in June of this year to discuss the fact that my methodology expert quit abruptly after several months of no communication, thus leaving several of us in the lurch however I only received an email of acknowledgment from his "assistant".

Is there anything you can do to help me secure a new methodology expert? I would appreciate any assistance or advice you can provide at this time.

Ex. 38, Callahan Email Exchange (Sept. 13, 2015).

201. Not only is requiring students to find replacements frustrating for the students, as described above, it is also a violation of the Walden student handbook which requires *Walden* to find replacements, not students, for faculty who suddenly depart.

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. 31, Excerpts, 2010-2011 Handbook at 123 (emphasis added); Ex. 30, Excerpts 2013-2014 Handbook at 214-215.

202. Even after her second time of replacing her methodologist and member, instead of voluntarily reimbursing her due to its AWOL employee, Plaintiff Callahan had to fight for a tuition reimbursement from Walden. Plaintiff Callahan was successful in this regard, but again it took time away from her dissertation.

203. Plaintiff Callahan's third methodologist is currently Dr. Tom Diebold who was assigned in March of 2016.

204. Now at the Proposal stage, Plaintiff Callahan faces further frustrations in that her materials must be approved by her chair, then her member, and finally her URR. If any proposed changes are made at any level (even if just for minor, grammatical reasons), the process must begin again.

205. Frustrating is that when the URR makes changes, Plaintiff Callahan is not allowed to interact directly with the URR about those changes. An example of this is the below email where Plaintiff Callahan requested a phone conference with her chair Dr. Mallett and her URR Dr. Patti Barrows, concerning comments/changes Dr. Barrow's had about the Proposal. In response, it was made clear that despite the fact the focus of the phone conference would be to discuss Dr. Barrow's comments, she would not be involved:

Hi Dr. Mallett,

My apologies if I was unclear, I meant we should schedule a phone call with just the committee (and myself if you like) and the student.

Dr. Barrows as URR is available for a phone call with you as chair, however.

~~~~~

Amy E. Sickel, Ph.D.  
Program Director,  
Academic Psychology Doctoral Programs  
Walden University

Ex. 39, Callahan Email Exchange (Oct. 12, 2016).

206. As any changes proposed by the URR starts the entire process over, and with each step allegedly requiring a two-week response time before climbing to the next level, it is clear that students at Walden are unlikely to timely get ahead.

207. Further, changes made by each level are often inconsistent and contradictory. For example, Plaintiff Callahan's URR's feedback in one area of the Proposal stated, "Sample size will likely change as you add to your RQs." Plaintiff Callahan questioned this remark via phone

with her current member and methodologist on October 15th, 2016, arguing that her sample size was not correlated with her research questions. Plaintiff Callahan's member and methodologist agreed. This confirms the URR improperly rejected Plaintiff Callahan's work, which required Plaintiff Callahan to restart the review process in error.

208. Plaintiff Callahan is now approaching her eighth year in her doctoral program. This is disturbing for all the reasons discussed about and also because Walden imposes an eight-year limit to its doctoral programs, extendable only for special circumstances.

209. As of now, Plaintiff has paid for 30 quarters during her time at Walden, including 17 dissertation classes and three residencies. Despite being promised it would take three-four years to complete her degree, she is almost in her eighth year, and still on the third (of five) step of the dissertation process.

210. Had Plaintiff 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 and hurdles to completing a dissertation or had it disclosed its true scheme, Plaintiff would not have enrolled in or agreed to pay for the educational services offered by Walden. Additionally, had Walden not omitted to inform Plaintiff of the "design" time of its program, she would not have agreed to enroll in and pay for the educational services offered by Walden. Finally, if Plaintiff had been unaware of the lack of oversight Walden provided to its faculty, she would not have agreed to enroll in and pay for the educational services offered by Walden.

211. Walden has intentionally and unjustly prolonged Plaintiff Callahan'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 revenue and minimize its overhead so that more of the revenue could be spent on marketing to ensnare more students. Because of Walden's illegal conduct, Plaintiff spent more time and tuition payments than what she had reasonably anticipated she would.

212. Due to her maintaining a 4.0 GPA at Walden (and at her traditional graduate school, National University), Plaintiff Callahan was invited to join the Golden Key honor society and Psi Chi (the National Psychology Honor Society). It is telling that not even a straight-A, honor society student can complete the Walden dissertation process in the time promised, let alone complete the program at all.

213. Plaintiff Callahan has lost more than money and time due to Walden. She has also turned down additional work opportunities so as to devote time to her doctoral studies, missed out on numerous social opportunities, her sleep has suffered due to stress and she will never be able to recoup the time investment of the past eight years. For example, in addition to having a full-time job, she teaches forensic science and criminal justice courses in an adjunct capacity at the collegiate level. In lieu of accepting additional teaching assignments, curriculum development assignments, professional conferences and presentations, she has been required to devote substantial time to the dissertation process. She has also refrained from submitting for or testing for any promotional or professional advancement opportunities to focus solely on her dissertation. She has also had to repeatedly turned down social activities and family obligations to instead focus on the dissertation process. Finally, she suffers from significant sleep deprivation due to stress. Being a 25-year criminal justice and forensic science professional, she has become adept at adapting to stress; however, the stress associated with the Walden doctoral program due to its egregious financial impact and callous attitude has been incredibly stressful.

In 2016, she began taking anti-anxiety medication due to the stress directly related to her academic work with Walden. Prior to her time at Walden, she did not need medication or other resources due to stress.

**Plaintiff Jennifer Wright**

214. Plaintiff Jennifer Wright is a teacher for Barstow Unified School District, and has been so for 18 years. Plaintiff Wright is also an 11-year veteran of the Marine Corps, and 5-year veteran of the California Army National Guard.

215. Plaintiff Jennifer Wright enrolled at Walden in May 2009 in the Doctor of Education (EdD) Program. Plaintiff Wright chose Walden and the EdD program because Walden representatives at a Back to School rally in Barstow, California, promised her and other teachers in attendance that the Walden EdD program was a 3-year program that would cost \$34,000. The Walden employee who enrolled her (Mark Taylor) on the phone also confirmed that the EdD would be a 3-year program at a cost of \$34,000.

216. Plaintiff Wright, and other teachers who enrolled in Walden's EdD program, relied upon these representations in choosing Walden.

217. Walden's statements about a 3-year, \$34,000 EdD program were false. Laureate's Program Data webpage for Walden's EdD program explains the EdD program was "designed to take 52 months," although only 23% of students who graduated would do so within that time frame.

[Go back to Walden's Doctor of Education \(EdD\) program](#)

Walden University  
**Doctor of Education**  
Program Level - Doctoral degree  
Program Length - 52 months

COST

Q. How much will this program cost me?\*

A. Tuition and fees: \$59,731  
Books and supplies: \$0  
On-campus room & board: *not offered*

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[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

SUCCESS

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

A. The program is designed to take 52 months to complete. Of those that completed the program in 2014-2015, 23% finished in 52 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 \*%.

Ex. 5, EdD Program Data (4/15/2016 data).

218. Given Walden was in possession of this data since it along with Laureate designed this program to allegedly take 52 months, its promises of a 3-year EdD program were knowingly false, and made purposefully for teachers to rely upon.

219. Had Plaintiff Wright and other EdD students known that the program was designed to take 52 months (or that only 23% of students who graduated did so in that time frame), they would not have enrolled in Walden's EdD program.

220. The length of Plaintiff Wright's time at Walden is proof that the promises made by Walden of a three-year, \$34,000 EdD were false. Given the seven years she attended Walden, she has exhausted her GI Bill, and was forced to rely upon student loans to finish her education.

221. For the time she attended Walden, Plaintiff Wright paid \$244,000.

222. Plaintiff also completed one residency course, obtaining the necessary satisfactory grade. For this course, she paid approximately \$4,500, plus hotel, flight and meals for five days.

223. Upon completion of her required doctoral-level courses (for which she received only As), Plaintiff began her dissertation in May 2012. She worked diligently on her dissertation for 21 quarters (six years).

224. However, progress on her dissertation remained elusive for this straight-A student because of the systematic and intentional ways Walden delayed the process.

225. Wanting to be sure that she was using her time at Walden efficiently, Plaintiff started working on her Prospectus in May 2012.

226. Her Prospectus topic was approved in August 2012.

227. When Plaintiff Wright began working on her Proposal, she was initially allowed to communicate and receive input directly from her chair and member which was typically accomplished via email through Walden's Interactive Blackboard System. Plaintiff Wright relied upon such input to gain insight into whether she was headed in the correct direction and to provide her with general pointers.

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

229. 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>

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

231. Walden, however, took both resources away from Plaintiff Wright and all other members of the Class and Subclasses.

232. 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.

233. Prior to that, 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).



234. This placed Plaintiff Wright and other members of the Class and Subclasses 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**,” Plaintiffs and other members of the Class and Subclasses were now limited to only receiving the most general input on the Proposal. Ex. 31 at 174; Ex. 30 at 259 (emphasis added).

235. This was a substantial hurdle for Plaintiff Wright and members of the Class and Subclasses. 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. Despite this, Walden prohibited Plaintiff Wright and the members of the Class and Subclasses from receiving anything but the most general input from the guidance from their Committee advisers that they had been promised.

236. Further, over the course of Plaintiff Wright’s time at Walden, she experienced innumerable delays, lack of oversight by Walden 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 the students and faculty’s way. In other words, Plaintiffs 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 revenue from its doctoral students. Walden has subjected the other members of the Class and Subclasses to the same scheme, thereby causing them to be damaged in the same manner as Plaintiffs.

237. For example, Plaintiff Wright had difficulties with her first chair James Thomasson. Thomasson consistently exceeded the 14 day turn around, resulting in additional semesters of enrollment. With Thomasson as her chair, Plaintiff Wright submitted numerous complaints through the school's "Positive Progress" program, but received no substantive response from Walden.

238. Finally, she was able to replace Thomasson with Rollen Fowler. However, Fowler's input was inconsistent with her first chair, and basically required Plaintiff Wright to begin the entire process over.

239. Because of the above, it appeared to Plaintiff Wright that graduating from Walden would be impossible. In view of this, she recently transferred to a different university, though of the 120 credits taken at Walden, only 12 transferred. Further, her time at Walden exhausted her GI Bill and most of her financial aid resources, making attending her new school financially more challenging.

240. When Plaintiff Wright left Walden, she was in her seventh year, stuck on her Proposal (only 3/5 of the way towards completion) of what was promised to be a 3-year program.

241. Despite being on a teacher's salary, she is in debt over \$244,000.

242. All Plaintiff Wright wanted to do was serve her country and help others.

243. Further, she's been trying to fulfill her dream of earning her doctorate before her parents pass on.

244. Had Plaintiff 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 and hurdles to completing a dissertation or had it disclosed its true scheme, Plaintiff would not have enrolled in or agreed to pay for the educational services offered by Walden. Additionally, had Walden not omitted to inform Plaintiff of the "design" time of its program, she would not have agreed to enroll in and pay for the educational services offered by Walden. Finally, if Plaintiff had been unaware of the lack of infrastructure for the dissertation process and oversight Walden provided to its faculty, she would not have agreed to enroll in and pay for the educational services offered by Walden.

245. Walden intentionally and unjustly prolonged Plaintiff Wright'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. Because of Walden's illegal conduct, Plaintiff spent more time and tuition payments than what she had reasonably anticipated she would.

246. Plaintiff Wright's time in Walden has cost her more than money and time, due to the stress that has been placed on her, she suffers pain and physical and mental anguish. She now takes anxiety medication and has seen doctors due to stress. Prior to her time at Walden, she did not need medication or other resources due to stress.

**Plaintiff Janet Harrison**

247. Plaintiff Harrison enrolled in the DBA program at Walden in 2008. Plaintiff enrolled in the DBA program the first term Walden offered it.

248. Plaintiff Harrison chose Walden because prior to enrolling, her recruiter informed her the DBA program could be completed in as few as 18 months—six terms. The recruiter also stated that it was possible for students to finish even earlier, but even if that should happen, the student would still need to complete the remainder of the six terms.

249. Plaintiff Harrison relied upon these representations in choosing Walden.

250. Similar promises were made to other DBA students, including that the program's dissertation process (*i.e.*, DBA 9000 classes) would only last 96 weeks with 40 weeks of dissertation (five dissertation level classes). See, e.g., Ex. 3, 7, 8.

251. These statements and promises, however, were false.<sup>20</sup> Laureate's current Program Data for Walden's DBA program explains the DBA program was "designed to take 50 months," although only 52% of students *who graduated* would do so within that time frame.

**Walden University**  
**Doctor of Business Admin**  
 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.

**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.

<sup>20</sup> Indicative of how false this statement is, the Laureate DBA webpage from Dec. 23, 2012 stated that Walden "had fewer than 10 graduates" in its DBA program between July 1, 2010 and June 30, 2011. Walden's first DBA program class enrolled in 2008. If the time to completion was in fact 96 weeks (2 years), then the number of graduating students should have been much higher.

252. Given Walden was in possession of this data (because it along with Laureate designed this program to allegedly take 50 months), Walden's promises of anything shorter were knowingly false, and made purposefully for prospective and current students to rely upon such false statements.

253. Had Plaintiff Harrison and other DBA students known that the program was designed to take 50 months, they would not have attended Walden and would not have enrolled in Walden's DBA program.

254. Further, the false representations continued while Plaintiff Harrison was in the DBA program, including an email from Dr. Freda Turner who stated, "You will be in DBA 9000 a total of 5 sessions (40 weeks) in order to complete all the required things outlined in the process checklist that I have highlighted below." Ex. 7. DBA 9000 is the dissertation class students enroll in while they complete their dissertation. This email was a promise then to Plaintiff Harrison that it would take her a total of five semesters to complete her dissertation.

255. These representations were false. Instead of the five dissertation classes promised, Plaintiff Harrison is now in her 42<sup>nd</sup> class.

256. Plaintiff is a 3.57 grade point average student who transferred into Walden's DBA program.

257. Despite this, since 2010, she has been stuck on her dissertation, during which Plaintiff Harrison has incurred over \$400,000 in tuition and debt into what was promised to be an 18 month/6 term program.

258. Plaintiff Harrison received only As and Bs in her courses.

259. Upon completion of those required doctoral-level courses, Plaintiff began her dissertation in March 2010. She has received “satisfactory” grades (the highest allowed) in all dissertation classes.

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

261. Over the course of Plaintiff’s time at Walden, she experienced innumerable delays, lack of oversight by Walden and multiple instances of faculty members failing to fulfill their responsibilities as dissertation chairs and members. In other words, Plaintiff 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 revenue.

262. For example, Plaintiff Harrison’s first chair in March 2009 was Dr. Dani Babb.

263. With Dr. Babb as her chair, Plaintiff Harrison spent from March 2009 to May 2013 (four years) writing her Proposal. Although never giving in-depth, substantive responses, all indications from Dr. Babb were that Plaintiff Harrison’s proposal was acceptable and on track for approval. However, Dr. Babb resigned.

264. Dr. Babb was replaced with Dr. James Savard in May 2013. Despite having previously received only positive input on her Proposal from Dr. Babb, Dr. Savard informed Plaintiff Harrison that her Proposal was not acceptable and required her to start over. Dr. Savard also informed Plaintiff Harrison that her previously approved topic was also not acceptable, which required her to change topics. This inconsistent advice between two chairs resulted in four years of lost work for Plaintiff Harrison.

265. Plaintiff Harrison spent the next year attempting to obtain Dr. Savard’s approval of her Proposal. Actually, she spent a year attempting to get him to approve the Purpose Statement and

Problem Statement in her Proposal. Dr. Savard's input, however, was substantively limited, most times advising her to simply review other resources such as a PowerPoint or video, which delayed Plaintiff Harrison's dissertation process.

266. In more detail, the Problem Statement is the first paragraph of the dissertation and is the most difficult to write. Walden has unusually strict rules about how it is written. It must contain specific wording that the committee chair approves. The Problem Statement must be no more than 150 words and must include 1) a "current" hook supported by peer reviewed or government citation less than 5 years old from anticipated graduation date, 2) a "current" data driven anchor supported by peer reviewed or government citation less than 5 years old from anticipated completion date; 3) the general business problem and 4) the specific business problem. Although most students find Walden's interpretations of "hook" and "anchor" difficult to understand, most dissertation committee chairs and members do not explain these requirements; rather, they refer the students to a library of PowerPoint Presentations and videos that are used term after term.

267. The Purpose Statement is the second paragraph in the Proposal. The Purpose Statement must not be more than 200 words, but must include the research method, research design, specific population group, geographic location, and the contribution to social change.

268. If a student does not meet the Problem Statement and Purpose Statement requirements (which are often not explained and subjective to each chair or member), they are sent back to begin repeatedly, often with no input from their chairs other than referral to the above-mentioned PowerPoints and videos. This process results in weeks and weeks of frustrating turn-around on writing two paragraphs.

269. Eventually, Plaintiff Harrison petitioned to replace Dr. Savard. Ex. 40, Harrison Email Exchange (Sept. 1, 2014) ("...I have changed the focus of my study several times simply

because I cannot seem to get any definitive feedback on my work so far.”). After months of back and forth with Walden in which it initially refused to change her chair, Plaintiff Harrison was finally given her third committee chair, Dr. Tim Truitt.

270. Plaintiff Harrison has now just begun working her URR on her dissertation, and yet again is receiving inconsistent input. For example, just this September—after eight years in the program—she received an email from Dr. Truitt advising that because “many Walden DBA students have somehow acquired misinformation,” that they will need to change their methodology.

In the Walden DBA Program, case study research is becoming an increasingly prominent method for exploring business topics. I believe many Walden DBA students have somehow acquired misinformation that using quantitative research methods would expedite their research—and it is becoming very clear that this is not the case. In addition, the Methodologist Team has increased their scrutiny and requirements for the Phenomenological method for doc studies.

In general, the DBA Program is taking a more proactive role by encouraging students to do themselves a favor and go with a single or multiple case study methodology for their doc study work.

Ex. 41, Role of Mentor Email (Sept. 18, 2015). This advice (inconsistent with the input she received for the prior eight years) led to a restructuring of her dissertation and research, and additional lost time and tuition. Further, in May 28, 2015, after seven years in the program, Plaintiff learned that “The bar has been raised” in that the “minimum passing number of points for DDBA 9000 is moving from 700 points to 800 points.” Again, this resulted in additional wasted time and tuition. Ex. 35, Harrison Email Exchange (May 28, 2015).

271. After her time at Walden exceeded five dissertation classes, Plaintiff Harrison began receiving emails that falsely encouraged that graduation might be just around the corner. For example, on March 5, 2013, she received an email teasing “Hello future doctor” and included the false hope that “you can complete this year!!!”:



Hello future doctor,

You are receiving this message as you have completed 5 sessions of 9000. I wanted to alert you to some resources that might be helpful as you complete your DBA program this year. I really like the sound of Dr. and I am confident this can be an accomplishment that you can complete this year!!!

Ex. 33, DBA Email to J. Harrison (March 5, 2013). Walden made such promises knowing enticements were necessary to keep students enrolled in the program beyond its promised end dates.

272. Further, Plaintiff Harrison received a Feb. 19, 2015 email from Dr. Douglas Campbell, a Walden employee who allegedly oversaw the 9000 level DBA dissertation courses. In this email, Dr. Campbell encouraged Plaintiff Harrison with her studies by stating, “The graduation rate for the Walden DBA program is about 72 percent.” Ex. 42, Harrison Email Exchange (Feb. 19, 2015). Upon information and belief, this is a false statement made to entice Plaintiff Harrison to continue in the DBA program.

273. Beyond the above, Plaintiff Harrison’s dissertation committee has also consistently exceeded its 14 day turn around, resulting in additional semesters of enrollment.

274. The above resulted in Plaintiff Harrison paying approximately \$400,000 to Walden for over eight years of a program that was promised to only last six terms.

275. Had Plaintiff 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 and hurdles to completing a dissertation or had it disclosed its true scheme, Plaintiff would not have enrolled in or agreed to pay for the educational services offered by Walden. Additionally, had Walden not omitted to inform Plaintiff of the “design” time of its program, she would not have agreed to enroll in and pay for the educational services offered by

Walden. Finally, if Plaintiff had been unaware of the lack of oversight Walden provided to its faculty, she would not have agreed to enroll in and pay for the educational services offered by Walden.

276. Walden intentionally and unjustly prolonged Plaintiff Harrison'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 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 spent more time and more tuition payments beyond what she had reasonably anticipated she would have had Walden not engaged in its illegal conduct.

277. Plaintiff Harrison's time in Walden cost her more than money and time, due to the stress that had been placed under due to the continuous loop of denying her dissertation, she suffers mental anguish. She has lost eight years of her life, endured enormous stress and anxiety, and compromised her career growth.

#### **Plaintiff Pete Holubz**

278. Plaintiff Pete Holubz III is a product manager (and soon to be director) at First Data, working in electronic payments.

279. Plaintiff Holubz enrolled at Walden in November 2010 in the DBA program. While attending Walden, he suffered many of the same hurdles as Plaintiff Harrison, who was also a DBA student.

280. Prior to enrolling, Walden recruiters informed Plaintiff Holubz that it normally would take 2-3 years to finish the DBA program. The recruiter also advised that since he graduated from Kennesaw State in 2000 with his MBA, that some of his credits would transfer (so long as

he enrolled at Walden within 10 years of graduating—which he did), and that this would speed up the process for him.

281. While enrolled in the DBA program, Plaintiff Holubz attended two residencies in Georgia on March 23-27, 2011 and Sept. 26-Oct. 2, 2011, for which he paid approximately \$935 for each, plus travel and meals. At one of these residencies, he was provided materials which explained the dissertation process would take only five terms or 40 weeks. Ex. 14, The Journey.

282. Plaintiff Holubz relied upon the above representations in attending and remaining enrolled at Walden. Prior to enrolling, he considered several online universities. Walden's DBA program was the quickest, and being able to complete his DBA in 2-3 years (or less with transfer credits) was important in his choice of schools.

283. Further, and as discussed above for Plaintiff Harrison, similar promises were made to other DBA students.


284. These statements and promises, however, were false. Laureate's current Program Data for Walden's DBA program explains the DBA program was "designed to take 50 months," although only 52% of students *who graduated* would do so within that time frame.

**Walden University**

**Doctor of Business Admin**

Program Level - Doctoral degree

Program Length - 50 months



PRINT

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*

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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 50 months to complete. Of those that completed the program in 2014-2015, 52% finished in 50 months.

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

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

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

285. Given Walden was in possession of this data (because it along with Laureate designed this program to allegedly take 50 months), Walden's promises of anything shorter were knowingly false, and made purposefully for prospective and current students to rely upon such false statements.

286. Had Plaintiff Holubz and other DBA students known that the program was designed to take 50 months, they would not have attended Walden and would not have enrolled in Walden's DBA program.

287. Plaintiff is a 4.0 grade point average student in Walden's DBA program, and has received "satisfactory" grades (the highest allowed) in all his dissertation classes.

288. Despite this, since early 2012, he has been stuck on his dissertation. For the six years he attended Walden, Plaintiff Holubz incurred over \$131,552 in tuition and debt for what was promised to be a 2-3 year/five dissertation class program.

289. Over the course of his dissertation, he experienced innumerable delays, lack of oversight by Walden and multiple instances of faculty members failing to fulfill their responsibilities as

dissertation chairs and members. In other words, Plaintiff 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 revenue from its doctoral students.

290. With delays due to a lack of oversight, Plaintiff Holubz has been unable to advance beyond the Proposal stage (just the third stage of the five-stage dissertation process). Such delays include being the victim of inconsistent and delayed feedback from his dissertation committee, repeated rubric changes and delays due to MyDr.

291. For example, after his chair approved his Proposal (after numerous submissions), Plaintiff's member returned it with over 300 requests to change. How the chair could believe the Proposal was acceptable, only to have the member find 300+ changes/errors within the same document shows the inconsistency of the process. Nonetheless, Plaintiff Holubz addressed these 300+ changes, even hiring an outside editor to assist him, and submitted a revised Proposal to his chair again. During this process, a glitch in MyDR held up the review process for 3-4 weeks (it identified his Proposal as a plagiarism risk *in view of his prior Proposal*) resulting in additional tuition and fees. Once the MyDR issue was addressed, and the chair approved his Proposal, it was sent to the member again. Despite addressing all 300 previous concerns, retaining an outside editor and gaining the chair's approval *again*, the member allegedly found 200 additional changes to be made, though such changes were riddled with inconsistencies from his prior review.

292. Unfortunately, if things continue in this manner, he will need to withdraw after this semester...six years into his promised 2-3-year program.

293. Had Plaintiff been made aware of Walden's abysmally low completion rate, he 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 and hurdles to completing a dissertation or had it disclosed its true scheme, Plaintiff would not have enrolled in or agreed to pay for the educational services offered by Walden. Additionally, had Walden not omitted to inform Plaintiff of the “design” time of its program, he would not have agreed to enroll in and pay for the educational services offered by Walden. Finally, if Plaintiff had been aware of the lack of oversight Walden provided to its faculty, he would not have agreed to enroll in and pay for the educational services offered by Walden.

294. Walden intentionally and unjustly prolonged Plaintiff’s work toward his doctoral degree and extracted extra tuition payments from him. As a result of the scheme, Plaintiff spent more time and more tuition payments beyond what he had reasonably anticipated he would have had Walden not engaged in its illegal conduct.

295. Ironically, Plaintiff Holubz was just informed that he has been selected by “Academic Affairs” to be a member of Walden’s Honor Society.

Due to your current academic standing in Walden's School of Management, you have been selected by Academic Affairs to become a member of the **Walden University Nu Rho Chapter** of the International Business Honor Society, **Delta Mu Delta** (DMD). This invitation is extended only to Walden University business students who have completed 75% of courses, are in the top 20% of their respective coursework, and have a minimum GPA of 3.75 as of the last semester.

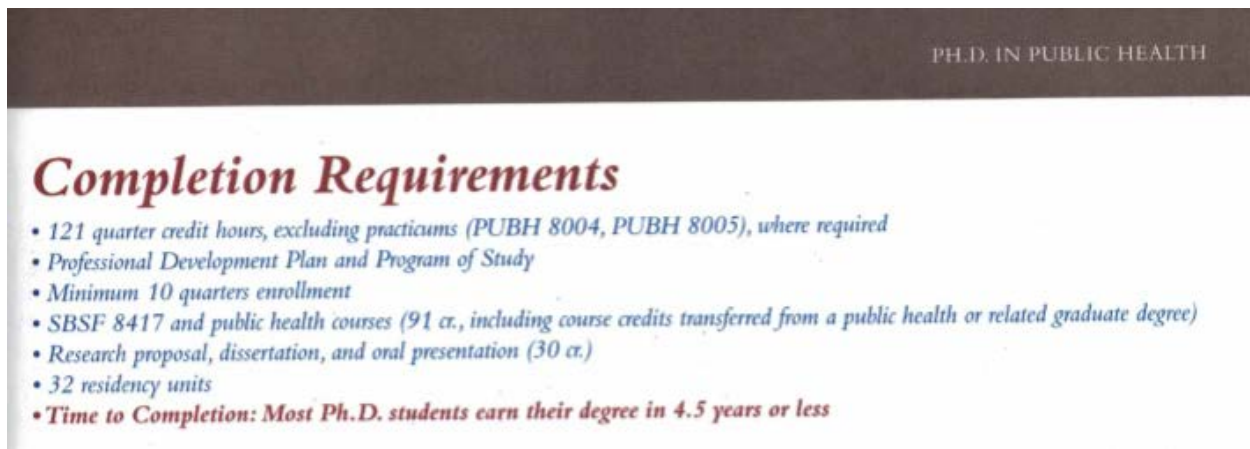
Ex. 43, Holubz Email Exchange (Nov. 17, 2016). The previous year, Plaintiff Holubz was invited to join the Golden Key honor society. It is telling that not even a straight-A, honor-society student can complete the Walden dissertation process in the time promised, let alone complete the program at all.

**Plaintiff Dr. Kelly Gardiner**

296. Plaintiff Dr. Kelly Gardiner is a Psychiatric Mental Health Nurse Practitioner and Board Certified Psychiatric Clinical Nurse Specialist who has worked in mental health for over 25 years. Dr. Gardiner works at the Community Mental Health Department where she specializes in treating people with chronic and persistent mental illness along with neurological conditions such as brain injuries, Parkinson's, dementia, multiple sclerosis and seizures. Dr. Gardiner is well versed in complimentary medicine for pets and people and has a background in neurology.

297. Plaintiff Gardiner enrolled at Walden in 2006 in the PhD in Public Health program, focusing on Community Health and Education.

298. In 2006, Plaintiff Gardiner and her husband attended a Walden seminar at the Renaissance Center in Detroit, Michigan. In providing the costs of tuition for the doctoral programs, the seminar speaker explained that it would cost \$43,000 to obtain a PhD in Public Health. Plaintiff also received a 2005 booklet from Walden at orientation that stated most students take 4 ½ years or less to obtain a PhD in Public Health.



Ex. 18, Walden Viewbook (excerpts) at 108.

299. Plaintiff relied on these representations in enrolling and continuing in Walden's PhD in Public Health Program. Specifically, she chose this program due to the represented cost and length of time to completion.

300. Walden's representations were false. As the Laureate webpage for Walden's PhD in Public Health Program from Feb. 12, 2015 provides, the program was "designed to take 66 months" although only 37% of students who graduated completed the course in that time.

**PhD in Public Health**  
Program Level - Doctoral degree  
Program Length - 66 months

**COST**

Q. How much will this program cost me?\*

A. Tuition and fees: \$49,200  
Books and supplies: \$3,258  
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, 37% 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.

Ex. 27, Laureate PhD in Program Date for Public Health (Feb. 12, 2015).

301. Given Walden/Laureate designed the PhD in Public Health program to take 66 months, promises of obtaining a degree in a shorter time frame (especially when only 37% of the students that graduated did so in less than 66 months), were false and knowingly made to entice students to further his or her education at Walden University.

302. Worse, although Walden/Laureate represented in Feb. 2015 that it would cost \$49,200 in tuition to complete this program, just a year later in 2016 when the page was updated, it raised the estimated tuition to \$70,563 (a more than \$21,000 increase), while allegedly shortening the program "designed" time three months.



**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.

**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 completed this program is \*%.

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

Ex. 29, Laureate PhD in Public Health Webpage (current). Walden's flexibility in changing its data proves the tuition estimates and times to completion promised to students (hoping students rely upon these false numbers to enroll into the PhD in Public Health program) were false.

303. Had Plaintiff Gardiner and other PhD Public Health students been informed by Walden that the PhD in Public Health program was designed to take 66 months, they would not have attended Walden. Further, given that less than 37% of students who graduated even finished the program within that time frame, a 66-month time frame is still too short.

304. Further, Walden's statement in its 2006 catalog on the PhD in Public Health page that "Most Ph.D. students earn their degree in 4.5 years or less" is demonstrably false in view that less than 37% of students *who graduated* did so in 5 ½ years.

305. Even further, the statement that "Most Ph.D. students earn their degree..." implies that the graduation rate of all Walden PhD in Public Health students (as well as doctoral students altogether) exceeds 50%. This unqualified statement necessarily includes students who unenroll. As alleged above, the doctoral graduation rate is much lower (upon information and belief about

10%). This emphasizes that Walden made many false statements, including misinforming its students about the ultimate graduation rate of doctoral students, hoping students would rely upon such false statements to enroll in Walden's PhD in Public Health program (indeed, in any doctoral program).

306. Plaintiff Gardiner enrolled in her doctoral program in September 2006.

307. Upon completion of her required doctoral-level courses (for which she received a 3.7 GPA), Plaintiff began her dissertation on *Variables that Contribute to Colorectal Cancer Screening in People with Chronic and Persistent Mental Illness Who Receive Services from a Community Mental Health Agency*. While in her dissertation classes, she has received the highest grade allowed (satisfactory).

308. Plaintiff Gardiner also completed four residency courses, obtaining the necessary satisfactory grades to advance from each of those courses. For two of her residency courses (in Dallas, Texas and Miami, Florida), Plaintiff Gardiner paid approximately \$2000 (including hotel, flight and meals for five days). To save money, for her third residency, she drove to St. Charles, IL, and spent about \$600 for a four-day residency. For her fourth residency, she could attend online.

309. However, progress on her dissertation remained elusive for this 3.7 GPA student because of the systematic and intentional manner in which Walden delayed her.

310. Over the course of Plaintiff's time at Walden, she experienced innumerable delays, lack of oversight by Walden and multiple instances of faculty members failing to fulfill their responsibilities as dissertation chairs and members. In other words, Plaintiff 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 revenue from its doctoral students.

311. For example, Plaintiff Gardiner's Prospectus was approved by her chair Dr. Francavillo and her committee member Dr. Williams in July 2014. She then submitted it to Dr. Pete Anderson (a newly added committee member), who rejected the Prospectus, stating:

These RQs are not sufficient for a dissertation at Walden. You need to test the relationships between at least 2 variables - what you have here is a simple description of care provided. Please discuss this with your chair and revise your RQs and HYs.

Ex. 44, Gardiner Email Exchange (July 20, 2014). Dr. Anderson did not just reject Plaintiff Gardiner's Prospectus, he in essence rejected the last "several quarters" of input and approvals from both her chair and member. *Id.* As Plaintiff Gardiner replied to the Program Director:

Imagine my shock when both my committee members approved my prospectus after 4 semesters only to have Pete tell me that it was not PhD level work.

*Id.* Through this inconsistent feedback due to Walden's lack of supervision, Plaintiff Gardiner lost four semesters of time.

312. Even further, after eight years of work (taking only two semesters off during the entire 10 years due to deaths in the family), Walden told Plaintiff Gardiner she was allegedly not making academic progress (though it was through no fault of her own), and threatened to unenroll her. Only after taking additional time out to send a letter to the Dean explaining the numerous delays due to lack of oversight, was she allowed to continue pursuing her degree.

313. Had Plaintiff 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 and hurdles to completing a dissertation or had it disclosed its true scheme, Plaintiff would not have enrolled in or agreed to pay for the educational services offered by Walden. Additionally, had Walden not omitted to inform Plaintiff of the "design" time of its program, she would not have agreed to enroll in and pay for the educational services offered by

Walden. Finally, if Plaintiff had been aware of the lack of oversight Walden provided to its faculty, she would not have agreed to enroll in and pay for the educational services offered by Walden.

314. Walden intentionally and unjustly prolonged Plaintiff Gardiner'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 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 spent more time and more tuition payments beyond what she had reasonably anticipated she would have had Walden not engaged in its illegal conduct.

315. Plaintiff Gardiner's time in Walden cost her more than money and time. Because of the continuous loop of denying her dissertation, she suffers mental anguish and has compromised her career growth.

#### **Plaintiffs' Experiences are Common at Walden**

316. Plaintiffs' experiences mirror those of thousands of other students. A comprehensive collection of such complaints are located at: <http://www.complaintboard.com/walden-university-l4025.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.

bonniea2  Send email

Sep 18, 2016

### Walden Doctoral Program

Like many of you, I have a similar story regarding the amount of money I am now in debt. I have recently graduated with my PhD. However, the process of reaching this milestone was prolonged by the dissertation process. I am now 178,000 in debt. I want to join this class action suit because of the unethical practices of this University.

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 Attorney 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.

kernonne42  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.


Jlanaii  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 that these 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 colloques. 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 forward ....task 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. Every 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!

317. 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](mailto: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](mailto: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.

### **MISREPRESENTATIONS MADE BY WALDEN TO ITS STUDENTS, AND OMISSIONS WITHHELD**

318. Walden has made and broken many promises to its students as detailed above.
319. The Walden Student Handbook indicates that after coursework is completed, the dissertation process can be completed in 13 months.
320. Walden's materials, website and recruiters have promised faster timelines to completion than its doctoral programs' "design" time, including the commonly promised three years to completion and dissertation processes that take only 18 months (or five dissertation courses).
321. Walden also represents online "normal time to completion" and "On-time completion rates" for its courses. These timelines are false in view of Walden/Laureate's admitted "design" times for these programs.
322. Further, given that Walden upon information and belief has a completion rate below 10% of its doctoral student population, the fact that Walden is representing *any* time to completion let alone a "normal time to completion" or "On-time completion rates" is fraudulent.
323. Walden and Laureate also failed to disclose the "design" time of its programs to its students.

324. Walden also withheld its actual completion rate of its student doctoral population from prospective and current students.

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

326. 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. 31, 2010-2011 Handbook at 130; Ex. 30, 2013-2014 Handbook at 221.

327. 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.*

328. 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.

329. 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.*

330. This promise was broken to Plaintiffs and the members of the Class and Subclasses 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, even though 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 revenue for Walden.

331. The Handbook further promises that if a faculty member suddenly departed, Walden would 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. 31, Excerpts, 2010-2011 Handbook at 123 (emphasis added); Ex. 30, Excerpts 2013-2014 Handbook at 214-215.

332. 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 the students still paid tuition to Walden.

333. 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. 31 at 174; Ex. 30 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. 31 at 174; Ex. 30 at 259.

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

Additionally, often dissertation committee chairs and members would give inconsistent advice, sometimes advising after months, if not years, that a previously (and multiple times) approved topic needed to change, which would require students, after months/years of relying upon prior acceptance, to start over.

### **CLASS ACTION ALLEGATIONS**

335. The experiences of Plaintiffs at Walden were similar to those experienced by numerous other students attempting to navigate the dissertation process across all of Walden's doctoral disciplines.

336. Plaintiffs request the Court certify this lawsuit as a class action pursuant to Rule 23 of the Federal Rules of Civil Procedure.

337. In the first instance, Plaintiffs seeks certification of a nationwide Class under Minnesota law, including certification of claims for fraud in the inducement under Minnesota law (First Cause of Action), unjust enrichment under Minnesota law (Second Cause of Action), breach of contract under Minnesota law (Third Cause of Action), violations of the Minnesota Uniform Deceptive Trade Practices Act (Fourth Cause of Action) and Breach of Implied Covenant of Good Faith and Fair Dealing under Minnesota Law (Fifth Cause of Action). Thus, Plaintiffs 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").

338. In the alternative, should the Court decide not to certify a nationwide class under Minnesota law, Plaintiffs seeks certification of state Subclasses for each additional Plaintiffs according to their state of residency.



339. Certifying subclasses by states of residency would include at least California, Georgia, Washington and Michigan Subclasses.

340. For residents of California, those claims would include certification of claims for fraud in the inducement under California law (Sixth Cause of Action), Violations of the California Unfair Competition Law Bus. & Prof. Code §§ 17200, et seq. (Seventh Cause of Action), breach of contract under California law (Eighth Cause of Action) and Breach of Implied Covenant of Good Faith and Fair Dealing (Ninth Cause of Action). Thus, in the alternative, Plaintiffs seeks to certify the following California Subclass 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 California (“California Subclass”).

341. For residents of Georgia, those claims would include certification of claims for fraud in the inducement under Georgia law (Tenth Cause of Action), unjust enrichment under Georgia law (Eleventh Cause of Action), breach of contract under Georgia law (Twelfth Cause of Action), violation of Georgia Uniform Deceptive Trade Practices Act O.C.G.A. § 10-1-372 (Thirteenth Cause of Action) and Breach of Implied Covenant of Good Faith and Fair Dealing under Georgia Law (Fourteenth Cause of Action). Thus, in the alternative, Plaintiffs seeks to certify the following Georgia Subclass 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 Georgia (“Georgia Subclass”).

342. For residents of Washington, those claims would include certification of claims for fraud in the inducement under Washington law (Fifteenth Cause of Action), unjust enrichment under Washington law (Sixteenth Cause of Action), breach of contract under Washington law (Seventeenth Cause of Action), and violation of Washington Unfair Business Practices-

Consumer Protection Act § 19.86.020 (Eighteenth Cause of Action) and Breach of Implied Covenant of Good Faith and Fair Dealing under Washington Law (Nineteenth Cause of Action). Thus, in the alternative, Plaintiffs seeks to certify the following Washington Subclass 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 Washington (“Washington Subclass”).

343. For residents of Michigan, those claims would include certification of claims for fraud in the inducement under Michigan law (Twentieth Cause of Action), unjust enrichment under Michigan law (Twenty-First Cause of Action), breach of contract under Michigan law (Twentieth-Second Cause of Action) and violation of Michigan Consumer Protection Act 331 of 1976 (Twenty-Third Cause of Action). Thus, in the alternative, Plaintiffs seeks to certify the following Michigan Subclass 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 Michigan (“Michigan Subclass”).

344. 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.

345. Commonality: 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 low doctoral completion rate, Walden promised potential and current students false timelines to completion of its doctoral program, when graduating with a doctoral degree was the exception to the rule;
- c. Whether, with knowledge of its low doctoral completion rate, Walden omitted the true average annual doctoral completion/graduation rate of, on information and belief, 10% of its doctoral student population,
- d. Whether, with knowledge of the “designed” lengths of time for Walden’s various doctoral programs, Walden and Laureate promised potential and current students false times to completion of Walden’s doctoral programs;
- d. Whether, with knowledge of its low doctoral completion rate, Walden made false representations to its students about their actual chances of even completing a doctoral 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 though tuition payments;
- 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 their conduct toward the Class; and
- h. Whether, because of Walden and Laureate’s conduct, Plaintiffs and the Class are entitled to damages, restitution, equitable relief and/or other relief, and, if so, the amount and nature of such relief.

346. Typicality: The representative Plaintiffs’ claims are typical of the claims of the Class.

Plaintiffs and all members of the Class were injured by the same wrongful practices in which Walden has engaged. Further, the Plaintiffs 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.

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

348. Predominance and Superiority: 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 Plaintiffs' and the Class's claims. Further, due to the conduct of Walden, Plaintiffs 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 given the high indebtedness the students have (thus needing to work full time to pay for the damage caused by Walden) as well as fear of reprisals by Walden for students still enrolled in Walden doctoral programs. Also, while the aggregate damages sustained by the Class are in the hundreds of millions, the individual damages incurred by each member resulting from Walden's wrongful conduct are not significant enough to proceed individually under even a contingency model. 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.

Plaintiffs knows of no reason that this litigation should not proceed as a class action.

349. Manageability: A class action is manageable here, and if necessary to preserve the case as a class action, the Court itself can redefine the Class or Subclasses, create additional subclasses, or both.

350. 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**

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

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

353. Walden and Laureate were and are under a continuous duty to disclose to Plaintiffs and the members of the Class and Subclasses the true nature of the scheme that they have created and 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.

354. 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 tuition payment in exchange for the provision of educational services.

355. 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 cause of action asserted herein, Plaintiffs expressly pleads Equitable Tolling, Equitable Estoppel, Fraudulent Concealment and the Discovery Rule and their application thereto.

356. 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.

### **CAUSES OF ACTION**

#### **FIRST CAUSE OF ACTION**

##### **Fraud in the Inducement Against Walden and Laureate**

357. Plaintiffs brings this cause of action on behalf of a nationwide Class under Minnesota common law.

358. Plaintiffs reallege and incorporate the preceding allegations by reference as if set forth fully herein.

359. Walden and Laureate made actual or implied false representations concerning the cost and length of time to get a doctoral degree, while concealing the truth from prospective and actual students.

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

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

362. For example, Walden intentionally misled Plaintiffs with statements that the program would take a shorter time frame, and that Plaintiffs would have control over how quickly she could complete the program.

363. Instead, at the time Plaintiffs were recruited and enrolled in their respective doctoral degrees, Walden and Laureate concealed that the programs in which they enrolled were designed to take longer than disclosed.

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

365. Walden and Laureate also concealed or otherwise omitted information about the actual percentage of students who graduated with doctoral degrees from Walden.

366. 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.

367. These representations were material to Plaintiffs and the members of the Class agreeing to attend Walden.

368. 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, despite telling students they would take less time.

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

370. Plaintiffs and members of the Class was justified in relying upon these representations.

371. Walden and Laureate made these representations for the purpose of defrauding the Plaintiffs and members of the Class.

372. Plaintiffs 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 the annual graduation rate and resources available to them, doctoral students would not have enrolled.

## **SECOND CAUSE OF ACTION Unjust Enrichment Against Walden**

373. Plaintiffs reallege and incorporate the preceding allegations by reference as if set forth fully herein.

374. Plaintiffs bring this cause of action, in the alternative, on behalf of a Nationwide Class under Minnesota common law. Walden has engaged in unjust conduct, to the detriment of Plaintiffs and each member of the Nationwide Class.

375. Plaintiffs and each member of the Nationwide Class provided significant value to Walden in the form of tuition payments for doctoral dissertation courses (part of which on information and belief ultimately went to Laureate in the form of profits).

376. Walden appreciated or had knowledge of the benefit received by retaining the money paid by Plaintiffs and each member of the Nationwide Class.



377. Although Walden accepted the tuition payments and retained and received benefit therefrom, it did not provide students with the doctoral process that was promised and expected in connection with the payment of the tuition. On the contrary, Walden intentionally and deliberately used the dissertation process as a means of improperly extracting tuition and generating revenue and on information and belief eventually profit. Walden has intentionally and knowingly created 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 doctoral students will incur in an effort to complete their degrees.

378. This unjust conduct on the part of Walden has resulted in its doctoral students enrolling in more dissertation courses than would be necessary had Walden not acted unjustly and in incurring significant additional tuition costs (including costs for books, residency, technology fees, etc.). It has also caused certain Nationwide Class members to stop pursuing the process altogether.

379. Despite their inequitable conduct, Walden has retained the tuition payments (including costs for books, residency, technology fees, etc.) made by Walden doctoral students pursuing dissertation coursework and the profits therefrom.

380. As a result, Walden has been unjustly enriched, to the detriment of Plaintiffs and the members of the Nationwide Class.

### **THIRD CAUSE OF ACTION Breach of Contract Against Walden**

381. Plaintiffs reallege and incorporate the preceding allegations by reference as if set forth fully herein.

382. Plaintiffs brings this cause of action, in the alternative, on behalf of a Nationwide Class under Minnesota common law. Walden has systematically violated its contracts with Plaintiffs and each member of the Nationwide Class.

383. Plaintiffs and each member of the Nationwide Class contracted with Walden to receive doctoral educational services. Implied in each contract was a covenant of good faith and fair dealing.

384. 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 or five dissertation classes; 4) their respective programs could be completed in the promised time, 5) the process for obtaining a dissertation chair and member would be reasonable and not burdensome, and where chairs or members have left, Walden would find replacements; 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 7) appropriate and timely feedback (within 14 days) from their dissertation committee would be provided to students with respect to their dissertation work..

385. Rather than provide doctoral educational services as per its contractual agreement, Walden knowingly and intentionally created and implemented a dissertation process fraught with inefficiencies, meant to ensure that students receive neither adequate resources, nor the timely responses and attention that they were promised. All of this is done without honesty or transparency by Walden regarding the actual length of time the dissertation process will take,

and the expense that will be incurred by, its doctoral students to complete their degrees (if they are fortunate enough to complete their doctoral degrees). The policy implemented by Walden breaches its contracts with Plaintiffs and the Nationwide Class.

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

387. Furthermore, Plaintiffs and each member of the Nationwide 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.

388. The breach of contract on the part of Walden has resulted in Walden's doctoral students enrolling in more dissertation courses than would be necessary if Walden had honored its contract and, in many instances, caused Class members to stop pursuing their education altogether because of Walden's unlawful continuing of tuition payments.

389. Despite its knowing and intentional breach of the contracts, Walden has retained the tuition payments (including costs for books, residency, technology fees, etc.) made by the members of the Nationwide Class.

390. Walden has breached its contracts for doctoral education services with Plaintiffs and each member of the Nationwide Class. Walden's breach has caused damage to Plaintiffs and each member of the Nationwide Class in the form of additional and unexpected tuition payments (including costs for books, residency, technology fees, etc.) for doctoral dissertation courses and, in many instances, stopping the pursuit of their education altogether, which caused them to be further damaged in the amount of wasted tuition payments they made before being forced to withdraw from Walden's doctoral program.

391. Moreover, Walden has breached its contracts with Plaintiffs and each member of the Class to provide doctoral educational services to them by engaging in systematic conduct such that 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 Plaintiffs and each member of the Nationwide Class. Walden has breached its contracts for doctoral education services with Plaintiffs and each member of the Nationwide Class. Walden's breach has caused damage to Plaintiffs and each member of the Nationwide Class in the form of additional and unexpected tuition payments (including costs for books, residency, technology fees, etc.) for doctoral dissertation courses and, in many instances, stopping the pursuit of their education altogether, which caused them to be further damaged in the amount of wasted tuition payments they made before being forced to withdraw from Walden's doctoral program.

**FOURTH CAUSE OF ACTION**  
**Violation of Minnesota Uniform Deceptive Trade Practices Act §325D.44**  
**Against Walden and Laureate**

392. Plaintiffs reallege and incorporate the preceding allegations by reference as if set forth fully herein.

393. Plaintiffs 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.

394. Minnesota Stat. §325D.44 specifically prohibits the use of unfair or deceptive trade practices in connection with a consumer transaction. For example, Minnesota Stat. §325D.44 prohibits deceptive trade practices which occur when a person "(5) represents that goods or services have sponsorship, approval, characteristics, ingredients, uses, benefits, or quantities that they do not have or that a person has a sponsorship, approval, status, affiliation, or connection

that the person does not have;” “(7) represents that goods or services are of a particular standard, quality, or grade, or that goods are of a particular style or model, if they are of another;” “(9) advertises goods or services with intent not to sell them as advertised” and “(13) engages in any other conduct which similarly creates a likelihood of confusion or of misunderstanding.”

395. Students paying tuition so as to enroll in an institution is a consumer transaction.

396. By engaging in the acts and practices described in this complaint, Walden and Laureate have committed one or more acts of unfair and deceptive trade practices. For example, Walden and Laureate represent that Walden’s doctoral services 1) have characteristics that they do not have and 2) are of a particular standard, quality, or grade of which they are not. Walden and Laureate also 3) advertise Walden’s doctoral services with intent not to sell them as advertised and 4) engage in conduct which similarly creates a likelihood of confusion or of misunderstanding.

397. 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 or five dissertation classes; 4) their respective programs could be completed in the promised time, 5) the process for obtaining a dissertation chair and member would be reasonable and not burdensome, and where chairs or members have left, Walden would find replacements; 6) there would be reasonable stability in faculty member retention such that the process for obtaining a dissertation chair and member would not be repeated, much less repeated multiple times; and 7) appropriate and timely feedback (within 14 days) from their dissertation committee would be provided to students with respect to their dissertation work.

398. 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 falsely represented the time and tuition costs of obtaining a doctoral degree, not only knowing that such representations were false, but also with no intent to offer such services to its students. Walden and Laureate also 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 created 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.

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

400. The misrepresentations and omissions were material to Plaintiffs and the members of the Class.

401. 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.

402. Plaintiffs 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 Plaintiffs and members of the Class would rely on the representations and omissions.

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

Plaintiffs 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 Walden purported to provide.

#### **FIFTH CAUSE OF ACTION**

##### **Breach of Implied Covenant of Good Faith and Fair Dealing Against Walden**

404. Plaintiffs reallege and incorporate the preceding allegations by reference as if set forth fully herein.

405. Plaintiffs bring this cause of action on behalf of a Nationwide Class under Minnesota common law. Walden has systematically violated its contracts with Plaintiffs and each member of the Nationwide Class.

406. Plaintiffs and each member of the Nationwide Class contracted with Walden to receive doctoral education services.

407. Implied in each contract was a covenant of good faith and fair dealing.

408. Plaintiffs and each member of the Nationwide Class provided value to Walden in the form of tuition payments for doctoral dissertation courses as contracted.

409. By the scheme and conduct detailed herein, Walden has breached the implied duty of good faith and fair dealing implied in its contracts.

410. This breach on the part of Walden has resulted in Walden doctoral students being damaged because they were required to enroll in dissertation courses that would not have otherwise been necessary, thereby necessitating substantial additional tuition payments (including costs for books, residency, technology fees, etc.). In addition, many students have been forced to stop pursuing their education.

#### **SIXTH CAUSE OF ACTION (Alternative California Subclass) Fraud in the Inducement Against Walden and Laureate**

411. Plaintiffs brings this cause of action on behalf of a state-wide Subclass under California common law.

412. Plaintiff Wright and each member of the California Subclass reallege and incorporate the preceding allegations by reference as if set forth fully herein.

413. Walden and Laureate made actual or implied false representations concerning the cost and length of time to get a doctoral degree, while concealing the truth from prospective and actual students.

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

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

416. For example, Walden intentionally misled Plaintiff Wright and each member of the California Subclass with statements that the program would take a shorter time frame, and that Plaintiff Wright and each member of the California Subclass would have control over how quickly they could complete the program.

417. Instead, at the time Plaintiff Wright and each member of the California Subclass were recruited and enrolled in their respective doctoral degrees, Walden and Laureate concealed that the programs in which they enrolled were designed to take longer than disclosed.

418. Similar, if not identical, false representations and omissions were also made to other members of the Subclass about their degree programs via recruiters, in Walden marketing materials and on Walden and Laureate webpages.

419. Walden and Laureate also concealed or otherwise omitted information about the actual percentage of students who graduated with doctorates from Walden.



420. 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.

421. These representations were material to Plaintiff Wright and each member of the California Subclass agreeing to attend Walden.

422. 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, despite telling students they would take less time.

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

424. Plaintiff Wright and each member of the California Subclass were justified in relying upon these representations.

425. Walden and Laureate made these representations for the purpose of defrauding the Plaintiff Wright and each member of the California Subclass.

426. Plaintiff Wright and each member of the California Subclass 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 the annual graduation rate and resources available to them, doctoral students would not have enrolled.

**SEVENTH CAUSE OF ACTION (Alternative California Subclass) Violations of the California Unfair Competition Law Bus. & Prof. Code §§ 17200, et seq.**

427. Plaintiffs reallege and incorporate the preceding allegations by reference as if set forth fully herein.

428. Plaintiff Wright brings this cause of action, in the alternative, on behalf of a California Subclass. Walden has engaged in unfair, unlawful, and fraudulent business practices, as set forth above.

429. By engaging in the above-described acts and practices, Walden has committed one or more acts of unfair competition within the meaning of the Unfair Competition Law, Bus. & Prof. Code §§ 17200, et seq.

430. Plaintiff Wright and each member of the California Subclass reasonably expected that their doctoral dissertation process would not be designed so that the students would be required to take many more quarters of dissertation coursework than necessary to obtain their doctoral degree.

431. Walden made false and misleading statements about the nature, quality, length, and cost of its doctoral education services. Specifically, Walden misrepresented 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 or five dissertation classes; 4) their respective programs could be completed in the promised time, 5) the process for obtaining a dissertation chair and member would be reasonable and not burdensome, and where chairs or members have left, Walden would find replacements; 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 7) appropriate and timely feedback (within 14 days) from their dissertation committee would be provided to students with respect to their dissertation work.

432. Walden also knowingly concealed, omitted and otherwise failed to state material facts about its doctoral education services that would tend to, and did in fact, deceive students. Specifically, Walden failed to disclose that it intentionally and deliberately used its dissertation process as a means of improperly extracting tuition and generating revenue. Walden further failed to disclose that it knowingly created and implemented a dissertation process that is fraught with inefficiencies, lasts longer and is more expensive than explained to students, 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.

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

434. Walden and Laureate designed the doctoral programs to last longer than what was explained to its students.

435. Walden/Laureate failed to disclose to its students that graduation rates of doctoral students was exceedingly low (*i.e.*, on information and belief, approximately 10% of doctoral student enrollment per year).

436. These misrepresentations and omissions were material to Plaintiff Wright and the members of the California Subclass.

437. Walden and Laureate's unfair, unlawful and fraudulent trade practices and acts occurred and continue to occur repeatedly during the course of Defendants' business.

438. Plaintiff Wright and members of the California Subclass relied on these representations and omissions in the course of pursuing their doctoral degrees.

439. Furthermore, Walden intended that Plaintiff Wright and members of the California Subclass would rely on the representations and omissions.

440. As a direct and proximate result of Walden and Laureate's unfair and deceptive practices and acts, Plaintiff Wright and the members of the California Subclass have suffered and will continue to suffer actual damages. Had Plaintiff Wright and the members of the California Subclass been aware of the true nature of the misrepresentations and omissions, they would not have enrolled at Walden or paid tuition to Walden for the educational services that Defendant purported to provide.

441. The injury to Plaintiff Wright and members of the California Subclass by this conduct greatly outweighs any alleged benefit to students or competition under the circumstances.

442. As a direct and proximate result of Walden and Laureate's unfair and deceptive practices and acts, Plaintiff Wright and the California Subclass have suffered and will continue to suffer actual damages.

443. Each of Walden's acts and practices are unlawful because they violate Civil Code §§ 1572, 1688, 1709-1710, 1770(a)(5), 1770(a)(7), 1770(a)(9), (1770(a)(19) and California Commercial Code §§ 17500, et seq. Specifically, Walden marketed and sold doctoral education services while intentionally failing to disclose 1) the "designed" lengths of time and actual costs of obtaining a Walden doctoral degree, 2) the systematic prolonging of the dissertation process requiring students to pay additional tuition and costs than reasonably expected and 3) the actual annual graduation rate of doctoral students. Walden was and is under a duty to disclose this systematic prolonging of its dissertation process and the affects it had on tuition and costs of a Walden doctoral degree, the actual time to graduation and doctoral graduation rates. The marketing, sales and representations to potential students, as well as the concomitant omissions, were and are material.

444. Walden and Laureate have been unjustly enriched and should be required to make restitution, ordered to disgorge improper tuition payments, provide injunctive relief to Plaintiff Wright and members of the California Subclass, and any other relief allowed under the UCL, plus interest, attorneys' fees and costs pursuant to, *inter alia*, Cal. Code of Civ. Proc. § 1021.5.

**EIGHTH CAUSE OF ACTION (Alternative California Subclass) Breach of Contract  
Against Walden**

445. Plaintiffs reallege and incorporate the preceding allegations by reference as if set forth fully herein.

446. Plaintiff Wright brings this cause of action, in the alternative, on behalf of a California Subclass under California common law. Walden has systematically violated its contracts with Plaintiff Wright and each member of the California Subclass.

447. Plaintiff Wright and each member of the California Subclass contracted with Walden to receive doctoral educational services. Implied in each contract was a covenant of good faith and fair dealing.

448. 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 or five dissertation classes; 4) their respective programs could be completed in the promised time, 5) the process for obtaining a dissertation chair and member would be reasonable and not burdensome, and where chairs or members have left, Walden would find replacements; 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 7) appropriate and timely

feedback (within 14 days) from their dissertation committee would be provided to students with respect to their dissertation work.

449. Rather than provide doctoral educational services as per its contractual agreement, Walden knowingly and intentionally created and implemented a dissertation process fraught with inefficiencies, meant to ensure that students receive neither adequate resources, nor the timely responses and attention that they were promised. All of this is done without honesty or transparency by Walden regarding the actual length of time the dissertation process will take, and the expense that will be incurred by, its doctoral students to complete their degrees (if they are fortunate enough to complete their doctoral degrees). The policy implemented by Walden unquestionably breaches its contracts with Plaintiff Wright and the California Subclass.

450. Plaintiff Wright and each member of the California Subclass provided significant value to Walden in the form of tuition payments and other costs for their doctoral programs as contracted.

451. Furthermore, Plaintiff Wright and each member of the California Subclass 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.

452. The breach of contract on the part of Walden has resulted in Walden's doctoral students enrolling in more dissertation courses than would be necessary if Walden had honored its contract and, in many instances, caused California Subclass members to stop pursuing their education altogether because of Walden's unlawful continuing of tuition payments.

453. Despite their knowing and intentional breach of the contracts, Walden has retained the tuition payments (including costs for books, residency, technology fees, etc.) made by the members of the California Subclass.

454. Walden has breached its contracts for doctoral education services with Plaintiff Wright and each member of the California Subclass. Walden's breach has caused damage to Plaintiff Wright and each member of the California Subclass in the form of additional and unexpected tuition payments (including costs for books, residency, technology fees, etc.) for doctoral dissertation courses and, in many instances, stopping the pursuit of their education altogether, which caused them to be further damaged in the amount of wasted tuition payments they made before being forced to withdraw from Walden's doctoral program.

455. Moreover, Walden has breached its contracts for doctoral education services with Plaintiff Wright and each member of the California Subclass 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 Wright and each member of the California Subclass. Walden has breached its contracts for doctoral education services with Plaintiffs and each member of the Nationwide Class. Walden's breach has caused damage to Plaintiff Wright and each member of the California Subclass in the form of additional and unexpected tuition payments (including costs for books, residency, technology fees, etc.) for doctoral dissertation courses and, in many instances, stopping the pursuit of their education altogether, which caused them to be further damaged in the amount of wasted tuition payments they made before being forced to withdraw from Walden's doctoral program.

**NINTH CAUSE OF ACTION (Alternative California Subclass) Breach of Implied  
Covenant of Good Faith and Fair Dealing Against Walden**

456. Plaintiffs reallege and incorporate the preceding allegations by reference as if set forth fully herein.

457. Plaintiff Wright brings this cause of action, in the alternative, on behalf of a California Subclass under California common law. Walden has systematically violated its contracts with Plaintiff Wright and each member of the California Subclass.

458. Plaintiff Wright and each member of the California Subclass contracted with Walden to obtain doctoral education services.

459. Implied in each contract was a covenant of good faith and fair dealing.

460. Plaintiff Wright and each member of the California Subclass provided value to Walden in the form of tuition payments and other costs for their doctoral programs as contracted.

461. By the scheme and conduct detailed herein, Walden has breached the implied duty of good faith and fair dealing implied in its contracts.

462. This breach on the part of Walden has resulted in Walden doctoral students being damaged because they were required to enroll in additional dissertation courses that would not have otherwise been necessary, thereby necessitating substantial additional tuition payments (including costs for books, residency, technology fees, etc.). In addition, many students have been forced to stop pursuing their education.

**TENTH CAUSE OF ACTION (Alternative Georgia Subclass)  
Fraud in the Inducement Against Walden and Laureate**

463. Plaintiffs brings this cause of action on behalf of a statewide Subclass under Georgia common law.

464. Plaintiffs Harrison and Holubz reallege and incorporate the preceding allegations by reference as if set forth fully herein.

465. Walden and Laureate made actual or implied false representations concerning the cost and length of time to get a doctoral degree, while concealing the truth from prospective and actual students.



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

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

468. For example, Walden intentionally misled Plaintiffs with statements that the program would take a shorter time frame, and that Plaintiffs would have control over how quickly she could complete the program.

469. Instead, at the time Plaintiffs were recruited and enrolled in their respective doctoral degrees, Walden and Laureate concealed that the programs in which they enrolled were designed to take longer than disclosed.

470. Similar, if not identical, false representations and omissions were also made to other members of the Subclass about their degree programs via recruiters, in Walden marketing materials and on Walden and Laureate webpages.

471. Walden and Laureate also concealed or otherwise omitted information about the actual percentage of students who graduated with doctoral degrees from Walden.

472. 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.

473. These representations were material to Plaintiffs Harrison and Holubz and the members of the Subclass agreeing to attend Walden.

474. 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, despite telling students they would take less time.

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

476. Plaintiffs Harrison and Holubz and members of the Subclass was justified in relying upon these representations.

477. Walden and Laureate made these representations for the purpose of defrauding the Plaintiffs Harrison and Holubz and members of the Subclass.

478. Plaintiffs Harrison and Holubz and members of the Subclass 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 the annual graduation rate and resources actually available to them, doctoral students would not have enrolled.

**ELEVENTH CAUSE OF ACTION (Alternative Georgia Subclass)  
Unjust Enrichment Against Walden**

479. Plaintiffs Harrison and Holubz reallege and incorporate the preceding allegations by reference as if set forth fully herein.

480. Plaintiffs Harrison and Holubz bring this cause of action, in the alternative, on behalf of a Georgia Subclass under Georgia common law. Walden has engaged in unjust conduct, to the detriment of Plaintiffs Harrison and Holubz and each member of the Georgia Subclass.

481. Plaintiffs Harrison and Holubz and each member of the Georgia Subclass provided significant value to Walden in the form of tuition payments for doctoral dissertation courses.

482. Walden appreciated or had knowledge of the benefit received by retaining the money paid by Plaintiffs Harrison and Holubz and each member of the Georgia Subclass.

483. Although Walden accepted the tuition payments and retained and received benefit therefrom, it 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 intentionally and deliberately used the dissertation process as a means of improperly extracting tuition and generating revenue. Walden has intentionally and knowingly created 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 Walden's doctoral students will incur in an effort to complete their degrees.

484. This unjust conduct on the part of Walden has resulted in its doctoral students enrolling in more dissertation courses than would have been necessary had Walden not acted unjustly, and in incurring significant additional tuition costs (including costs for books, residency, technology fees, etc.). It has also caused certain Georgia Subclass members to stop pursuing the process altogether.

485. Despite its inequitable conduct, Walden has retained the tuition payments (including costs for books, residency, technology fees, etc.) made by its doctoral students pursuing dissertation coursework and the profits therefrom.

486. As a result, Walden has been unjustly enriched, to the detriment of Plaintiffs Harrison and Holubz and the members of the Georgia Subclass.

**TWELFTH CAUSE OF ACTION (Alternative Georgia Subclass)  
Breach of Contract Against Walden**

487. Plaintiffs Harrison and Holubz reallege and incorporate the preceding allegations by reference as if set forth fully herein.

488. Plaintiffs Harrison and Holubz bring this cause of action, in the alternative, on behalf of a Georgia Subclass under Georgia common law. Walden has systematically violated its contracts with Plaintiffs Harrison and Holubz and each member of the Georgia Subclass.

489. Plaintiffs Harrison and Holubz and each member of the Georgia Subclass contracted with Walden to receive doctoral educational services. Implied in each contract was a covenant of good faith and fair dealing.

490. 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, and where chairs or members have left, Walden would find replacements; 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) from their dissertation committee would be provided to students with respect to their dissertation work.

491. 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 or five dissertation classes; 4) their respective programs could be completed in the promised time, 5) the process for obtaining a dissertation chair and member would be reasonable and not burdensome, and where chairs or members have left, Walden would find replacements; 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 7) appropriate and timely feedback (within 14 days) from their dissertation committee would be provided to students with respect to their dissertation work..

492. Rather than provide doctoral educational services as per its contractual agreement, Walden knowingly and intentionally created and implemented a dissertation process fraught with inefficiencies, meant to ensure that students receive neither adequate resources, nor the timely responses and attention that they were promised. All of this is done without honesty or transparency by Walden regarding the actual length of time the dissertation process will take, and the expense that will be incurred by, its doctoral students to complete their degrees (if they are fortunate enough to complete their doctoral degrees). The policy implemented by Walden breaches its contracts with Plaintiffs Harrison and Holubz and the Georgia Subclass.

493. Plaintiffs Harrison and Holubz and each member of the Georgia Subclass provided significant value to Walden in the form of tuition payments and fees for their doctoral programs as contracted.

494. Furthermore, Plaintiffs Harrison and Holubz and each member of the Georgia Subclass 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.

495. The breach of contract on the part of Walden has resulted in Walden's doctoral students enrolling in more dissertation courses than would be necessary if Walden had honored its contract and, in many instances, caused Georgia Subclass members to stop pursuing their education altogether because of Walden's unlawful continuing of tuition payments.

496. Despite its knowing and intentional breach of the contracts, Walden has retained the tuition payments (including costs for books, residency, technology fees, etc.) made by the members of the Georgia Subclass.

497. Walden has breached its contracts for doctoral education services with Plaintiffs Harrison and Holubz and each member of the Georgia Subclass. Walden's breach has caused damage to Plaintiffs Harrison and Holubz and each member of the Georgia Subclass in the form of additional and unexpected tuition payments (including costs for books, residency, technology fees, etc.) for doctoral dissertation courses and, in many instances, stopping the pursuit of their education altogether, which caused them to be further damaged in the amount of wasted tuition payments they made before being forced to withdraw from Walden's doctoral program.

498. Moreover, Walden has breached its contracts for doctoral educational services with Plaintiffs Harrison and Holubz and each member of the Georgia Subclass 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 Plaintiffs Harrison and Holubz and each member of the Georgia Subclass. Walden has breached its contracts for doctoral education services with Plaintiffs Harrison and Holubz and each member of the Georgia Subclass. Walden's breach has caused damage to Plaintiffs and each member of the Georgia Subclass in the form of additional and unexpected tuition payments (including costs for books, residency, technology fees, etc.) for doctoral dissertation courses and, in many instances, stopping the pursuit of their education altogether, which caused them to be further damaged in the amount of wasted tuition payments they made before being forced to withdraw from Walden's doctoral program.

**THIRTEENTH CAUSE OF ACTION (Alternative Georgia Subclass)  
Violation of Georgia Uniform Deceptive Trade Practices Act O.C.G.A. § 10-1-372 (2010)**

**Against Walden and Laureate**

499. Plaintiffs Harrison and Holubz realleged and incorporate the preceding allegations by reference as if set forth fully herein.

500. Plaintiffs Harrison and Holubz bring this cause of action on behalf of a Georgia Subclass. Walden and Laureate have engaged in unfair, unlawful, and fraudulent business practices, as set forth above.

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

502. 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.

503. 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 doctoral degree transaction had been supplied in accordance with previous representations made by Walden and/or Laureate to Plaintiffs Harrison and Holubz and members of the Georgia Subclass, 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 or five dissertation classes; 4) their respective programs could be completed in the promised time, 5) the process for obtaining a dissertation chair and member would be reasonable and not burdensome, and where chairs or members have left, Walden would find replacements; 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 7) appropriate and timely feedback (within 14 days) from their dissertation committee would be provided to students with respect to their dissertation work.

504. 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 created 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.

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

506. The misrepresentations and omissions were material to Plaintiffs Harrison and Holubz and the members of the Subclass.

507. 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.

508. Plaintiffs Harrison and Holubz and members of the Subclass relied on these representations and omissions in the course of pursuing their doctoral degrees. Furthermore, Walden and Laureate intended that Plaintiffs and members of the Subclass would rely on the representations and omissions.



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

**FOURTEENTH CAUSE OF ACTION (Alternative Georgia Subclass) Breach of Implied Covenant of Good Faith and Fair Dealing Against Walden**

510. Plaintiffs reallege and incorporate the preceding allegations by reference as if set forth fully herein.

511. Plaintiffs Harrison and Holubz bring this cause of action, in the alternative, on behalf of a Georgia Subclass under Georgia common law. Walden has systematically violated its contracts with Plaintiff Harrison and Holubz and each member of the Georgia Subclass.

512. Plaintiffs Harrison and Holubz and each member of the Georgia Subclass contracted with Walden to obtain doctoral education services.

513. Implied in each contract was a covenant of good faith and fair dealing.

514. Plaintiffs Harrison and Holubz and each member of the Georgia Subclass provided value to Walden in the form of tuition payments for doctoral dissertation courses as contracted.

515. By the scheme and conduct detailed herein, Walden has breached the implied duty of good faith and fair dealing implied in its contracts.

516. This breach on the part of Walden has resulted in Walden doctoral students being damaged because they were required to enroll in dissertation courses that would not have otherwise been necessary, thereby necessitating substantial additional tuition payments (including costs for books, residency, technology fees, etc.). In addition, many students have been forced to stop pursuing their education.

**FIFTEENTH CAUSE OF ACTION (Alternative Washington Subclass)  
Fraud in the Inducement Against Walden and Laureate**

517. Plaintiffs bring this cause of action on behalf of a Washington Subclass under Washington common law.

518. Plaintiff Callahan and members of the Washington Subclass reallege and incorporate the preceding allegations by reference as if set forth fully herein.

519. Walden and Laureate made actual or implied false representations concerning the cost and length of time to get a doctoral degree, while concealing the truth from prospective and actual students.

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

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

522. For example, Walden intentionally misled Plaintiff Callahan and members of the Washington Subclass with statements that the program would take a shorter time frame, and that Plaintiff Callahan and members of the Washington Subclass would have control over how quickly they could complete the program.

523. Instead, at the time Plaintiff Callahan and members of the Washington Subclass were recruited and enrolled in their respective doctoral degrees, Walden and Laureate concealed that the programs in which they enrolled were designed to take longer than disclosed.

524. Similar, if not identical, false representations and omissions were also made to other members of the Subclass about their degree programs via recruiters, in Walden marketing materials and on Walden and Laureate webpages.

525. Walden and Laureate also concealed or otherwise omitted information about the actual percentage of students who graduated with doctoral degrees from Walden.

526. 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.

527. These representations were material to Plaintiff Callahan and the members of the Subclass agreeing to attend Walden.

528. 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, despite telling students they would take less time.

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

530. Plaintiff Callahan and members of the Subclass was justified in relying upon these representations.

531. Walden and Laureate made these representations for the purpose of defrauding Plaintiff Callahan and members of the Subclass.

532. Plaintiff Callahan and members of the Subclass 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 the annual graduation rate and resources available to them, doctoral students would not have enrolled.

**SIXTEENTH CAUSE OF ACTION (Alternative Washington Subclass)  
Unjust Enrichment Against Walden**

533. Plaintiffs reallege and incorporate the preceding allegations by reference as if set forth fully herein.

534. Plaintiff Callahan and members of the Washington Subclass bring this cause of action, in the alternative, on behalf of a Washington Subclass under Washington common law. Walden has engaged in unjust conduct, to the detriment of Plaintiff Callahan and each member of the Washington Subclass.

535. Plaintiff Callahan and each member of the Washington Subclass provided significant value to Walden in the form of tuition payments for doctoral dissertation courses.

536. Walden appreciated or had knowledge of the benefit received by retaining the money paid by Plaintiff Callahan and each member of the Washington Subclass.

537. Although Walden accepted the tuition payments and retained and received benefit therefrom, it did not provide students with the doctoral process that was promised and expected in connection with the payment of the tuition. On the contrary, Walden intentionally and deliberately used the dissertation process as a means of improperly extracting tuition and generating revenue and on information and belief eventually profit. Walden has intentionally and knowingly created 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.

538. This unjust conduct on the part of Walden has resulted in its doctoral students enrolling in more dissertation courses than would be necessary had Walden not acted unjustly and in incurring significant additional tuition costs (including costs for books, residency, technology

fees, etc.). It has also caused certain Washington Subclass members to stop pursuing the process altogether.

539. Despite its inequitable conduct, Walden retained the tuition payments (including costs for books, residency, technology fees, etc.) made by Walden doctoral students pursuing dissertation coursework and the profits therefrom.

540. As a result, Walden has been unjustly enriched, to the detriment of Plaintiff Callahan and the members of the Washington Subclass.

**SEVENTEENTH CAUSE OF ACTION (Alternative Washington Subclass)  
Breach of Contract Against Walden**

541. Plaintiffs reallege and incorporate the preceding allegations by reference as if set forth fully herein.

542. Plaintiff Callahan and members of the Washington Subclass brings this cause of action, in the alternative, on behalf of a Washington Subclass under Washington common law. Walden has systematically violated its contracts with Plaintiff Callahan and members of the Washington Subclass.

543. Plaintiff Callahan and each member of the Washington Subclass contracted with Walden to receive doctoral educational services. Implied in each contract was a covenant of good faith and fair dealing.

544. 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 or five dissertation classes; 4) their respective programs could be completed in the promised time, 5) the process for obtaining a

dissertation chair and member would be reasonable and not burdensome, and where chairs or members have left, Walden would find replacements; 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 7) appropriate and timely feedback (within 14 days) from their dissertation committee would be provided to students with respect to their dissertation work..

545. Rather than provide doctoral educational services as per its contractual agreement, Walden knowingly and intentionally created and implemented a dissertation process fraught with inefficiencies, meant to ensure that students receive neither adequate resources, nor the timely responses and attention that they were promised. All of this is done without honesty or transparency by Walden regarding the actual length of time the dissertation process will take, and the expense that will be incurred by, its doctoral students to complete their degrees (if they are fortunate enough to complete their doctoral degrees). The policy implemented by Walden breaches its contracts with Plaintiff Callahan and the Washington Subclass.

546. Plaintiff Callahan and each member of the Washington Subclass provided significant value to Walden in the form of tuition payments and fees for doctoral dissertation courses as contracted.

547. Furthermore, Plaintiff Callahan and each member of the Washington Subclass 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.

548. The breach of contract on the part of Walden has resulted in Walden's doctoral students enrolling in more dissertation courses than would be necessary if Walden had honored its

contract and, in many instances, caused Subclass members to stop pursuing their education altogether because of Walden's unlawful continuing of tuition payments.

549. Despite its knowing and intentional breach of the contracts, Walden has retained the tuition payments (including costs for books, residency, technology fees, etc.) made by the members of the Washington Subclass.

550. Walden has breached its contracts for doctoral education services with Plaintiff Callahan and each member of the Washington Subclass. Walden's breach has caused damage to Plaintiff Callahan and each member of the Washington Subclass in the form of additional and unexpected tuition payments (including costs for books, residency, technology fees, etc.) for doctoral dissertation courses and, in many instances, stopping the pursuit of their education altogether, which caused them to be further damaged in the amount of wasted tuition payments they made before being forced to withdraw from Walden's doctoral program.

551. Moreover, Walden has breached its contracts with Plaintiff Callahan and each member of the Subclass to provide doctoral educational services to them by engaging in systematic conduct such that 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 Callahan and each member of the Washington Subclass. Walden has breached its contracts for doctoral education services with Plaintiff Callahan and each member of the Washington Subclass. Walden's breach has caused damage to Plaintiff Callahan and each member of the Washington Subclass in the form of additional and unexpected tuition payments (including costs for books, residency, technology fees, etc.) for doctoral dissertation courses and, in many instances, stopping the pursuit of their education altogether,

which caused them to be further damaged in the amount of wasted tuition payments they made before being forced to withdraw from Walden's doctoral program.

**EIGHTEENTH CAUSE OF ACTION (Alternative Washington Subclass)  
Violation of Washington Unfair Business Practices-Consumer Protection Act § 19.86.020  
Against Walden and Laureate**

552. Plaintiffs reallege and incorporate the preceding allegations by reference as if set forth fully herein.

553. Plaintiff Callahan brings this cause of action on behalf of a Washington Subclass. Walden and Laureate have engaged in unfair, unlawful, and fraudulent business practices, as set forth above.

554. Washington Stat. §325D.44 specifically prohibits unfair or deceptive acts or practices in the conduct of any trade or commerce.

555. By engaging in the above-described acts and practices, Walden and Laureate have committed one or more acts of unfair and deceptive trade practices in the conduct of trade or commerce.

556. 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 doctoral degree transaction had been supplied in accordance with previous representations made by Walden and/or Laureate to Plaintiff Callahan and members of the Washington Subclass, 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 or five dissertation classes; 4) their respective



programs could be completed in the promised time, 5) the process for obtaining a dissertation chair and member would be reasonable and not burdensome, and where chairs or members have left, Walden would find replacements; 6) there would be reasonable stability in faculty member retention such that the process for obtaining a dissertation chair and member would not be repeated, much less repeated multiple times; and 7) appropriate and timely feedback (within 14 days) from their dissertation committee would be provided to students with respect to their dissertation work.

557. 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 created 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.

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

559. The misrepresentations and omissions were material to Plaintiff Callahan and the members of the Subclass.

560. 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.

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

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

**NINETEENTH CAUSE OF ACTION (Alternative Washington Subclass)**

**Breach of Implied Covenant of Good Faith and Fair Dealing Against Walden**

563. Plaintiffs reallege and incorporate the preceding allegations by reference as if set forth fully herein.

564. Plaintiff Callahan and members of the Washington Subclass bring this cause of action on behalf of a Washington Subclass under Washington common law. Walden has systematically violated its contracts with Plaintiff Callahan and each member of the Washington Subclass.

565. Plaintiff Callahan and each member of the Washington Subclass contracted with Walden to receive doctoral education services.

566. Implied in each contract was a covenant of good faith and fair dealing.

567. Plaintiff Callahan and each member of the Washington Subclass provided value to Walden in the form of tuition payments for doctoral dissertation courses as contracted.

568. By the scheme and conduct detailed herein, Walden has breached the implied duty of good faith and fair dealing implied in its contracts.

569. This breach on the part of Walden has resulted in Walden doctoral students being damaged because they were required to enroll in dissertation courses that would not have otherwise been necessary, thereby necessitating substantial additional tuition payments (including costs for books, residency, technology fees, etc.). In addition, many students have been forced to stop pursuing their education.

**TWENTIETH CAUSE OF ACTION (Alternative Michigan Subclass)  
Fraud in the Inducement Against Walden and Laureate**

570. Plaintiffs brings this cause of action on behalf of a Michigan Subclass under Michigan common law.

571. Plaintiff Gardiner and members of the Michigan Subclass reallege and incorporate the preceding allegations by reference as if set forth fully herein.

572. Walden and Laureate made actual or implied false representations concerning the cost and length of time to get a doctoral degree, while concealing the truth from prospective and actual students.

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

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

575. For example, Walden intentionally misled Plaintiff Gardiner and members of the Michigan Subclass with statements that the program would take a shorter time frame, and that Plaintiff Gardiner and members of the Michigan Subclass would have control over how quickly she could complete the program.

576. Instead, at the time Plaintiff Gardiner and members of the Michigan Subclass were recruited and enrolled in their respective doctoral degrees, Walden and Laureate concealed that the programs in which they enrolled were designed to take longer than disclosed.

577. Similar, if not identical, false representations and omissions were also made to other members of the Subclass about their degree programs via recruiters, in Walden marketing materials and on Walden and Laureate webpages.

578. Walden and Laureate also concealed or otherwise omitted information about the actual percentage of students who graduated with doctoral degrees from Walden.

579. 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.

580. These representations were material to Plaintiff Gardiner and the members of the Subclass agreeing to attend Walden.

581. 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, despite telling students they would take less time.

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

583. Plaintiff Gardiner and members of the Subclass was justified in relying upon these representations.

584. Walden and Laureate made these representations for the purpose of defrauding Plaintiff Gardiner and members of the Subclass.

585. Plaintiff Gardiner and members of the Subclass 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 the annual graduation rate and resources available to them, doctoral students would not have enrolled.

**TWENTY-FIRST CAUSE OF ACTION (Alternative Michigan Subclass)  
Unjust Enrichment Against Walden**

586. Plaintiffs reallege and incorporate the preceding allegations by reference as if set forth fully herein.

587. Plaintiff Gardiner and members of the Michigan Subclass bring this cause of action, in the alternative, on behalf of a Michigan Subclass under Michigan common law. Walden has engaged in unjust conduct, to the detriment of Plaintiff Gardiner and each member of the Michigan Subclass.

588. Plaintiff Gardiner and each member of the Michigan Subclass provided significant value to Walden in the form of tuition payments for doctoral dissertation courses.

589. Walden appreciated or had knowledge of the benefit received by retaining the money paid by Plaintiff Gardiner and each member of the Michigan Subclass.

590. Although Walden accepted the tuition payments and retained and received benefit therefrom, it did not provide students with the doctoral process that was promised and expected in connection with the payment of the tuition. On the contrary, Walden intentionally and deliberately used the dissertation process as a means of improperly extracting tuition and generating revenue and on information and belief eventually profit. Walden has intentionally and knowingly created 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.

591. This unjust conduct on the part of Walden has resulted in its doctoral students enrolling in more dissertation courses than would be necessary had Walden not acted unjustly and in incurring significant additional tuition costs (including costs for books, residency, technology fees, etc.). It has also caused certain Michigan Subclass members to stop pursuing the process altogether.

592. Despite its inequitable conduct, Walden retained the tuition payments (including costs for books, residency, technology fees, etc.) made by Walden doctoral students pursuing dissertation coursework and the profits therefrom.

593. As a result, Walden has been unjustly enriched, to the detriment of Plaintiff Gardiner and the members of the Michigan Subclass.

**TWENTY-SECOND CAUSE OF ACTION (Alternative Michigan Subclass)  
Breach of Contract Against Walden**

594. Plaintiffs reallege and incorporates the preceding allegations by reference as if set forth fully herein.

595. Plaintiff Gardiner and members of the Michigan Subclass brings this cause of action, in the alternative, on behalf of a Michigan Subclass under Michigan common law. Walden has systematically violated its contracts with Plaintiff Gardiner and members of the Michigan Subclass.

596. Plaintiff Gardiner and each member of the Michigan Subclass contracted with Walden to receive doctoral educational services. Implied in each contract was a covenant of good faith and fair dealing.

597. 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 or five dissertation classes; 4) their respective programs could be completed in the promised time, 5) the process for obtaining a dissertation chair and member would be reasonable and not burdensome, and where chairs or members have left, Walden would find replacements; 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 7) appropriate and timely feedback (within 14 days) from their dissertation committee would be provided to students with respect to their dissertation work..

598. Rather than provide doctoral educational services as per its contractual agreement, Walden knowingly and intentionally created and implemented a dissertation process fraught with inefficiencies, meant to ensure that students receive neither adequate resources, nor the timely responses and attention that they were promised. All of this is done without honesty or transparency by Walden regarding the actual length of time the dissertation process will take, and the expense that will be incurred by, its doctoral students to complete their degrees (if they are fortunate enough to complete their doctoral degrees). The policy implemented by Walden breaches its contracts with Plaintiff Gardiner and the Michigan Subclass.

599. Plaintiff Gardiner and each member of the Michigan Subclass provided significant value to Walden in the form of tuition payments and fees for doctoral dissertation courses as contracted.

600. Furthermore, Plaintiff Gardiner and each member of the Michigan Subclass 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.

601. The breach of contract on the part of Walden has resulted in Walden's doctoral students enrolling in more dissertation courses than would be necessary if Walden had honored its contract and, in many instances, caused Subclass members to stop pursuing their education altogether because of Walden's unlawful continuing of tuition payments.

602. Despite its knowing and intentional breach of the contracts, Walden has retained the tuition payments (including costs for books, residency, technology fees, etc.) made by the members of the Michigan Subclass.

603. Walden has breached its contracts for doctoral education services with Plaintiff Gardiner and each member of the Michigan Subclass. Walden's breach has caused damage to Plaintiff Gardiner and each member of the Michigan Subclass in the form of additional and unexpected tuition payments (including costs for books, residency, technology fees, etc.) for doctoral dissertation courses and, in many instances, stopping the pursuit of their education altogether, which caused them to be further damaged in the amount of wasted tuition payments they made before being forced to withdraw from Walden's doctoral program.

604. Moreover, Walden has breached its contracts with Plaintiff Gardiner and each member of the Subclass to provide doctoral educational services to them by engaging in systematic conduct such that 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 Gardiner and each member of the Michigan Subclass. Walden has breached its contracts for doctoral education services with Plaintiff Gardiner and



each member of the Michigan Subclass. Walden's breach has caused damage to Plaintiff Gardiner and each member of the Michigan Subclass in the form of additional and unexpected tuition payments (including costs for books, residency, technology fees, etc.) for doctoral dissertation courses and, in many instances, stopping the pursuit of their education altogether, which caused them to be further damaged in the amount of wasted tuition payments they made before being forced to withdraw from Walden's doctoral program.

**TWENTY-THIRD CAUSE OF ACTION (Alternative Michigan Subclass)  
Violation of Michigan Consumer Protection Act 331 of 1976  
Against Walden and Laureate**

605. Plaintiffs reallege and incorporate the preceding allegations by reference as if set forth fully herein.

606. Plaintiff Gardiner brings this cause of action on behalf of a Michigan Subclass. Walden and Laureate have engaged in unfair, unlawful, and fraudulent business practices, as set forth above.

607. Michigan Stat. §325D.44 specifically prohibits the use of unfair or deceptive trade practices in connection with a consumer transaction.

608. Students paying tuition so as to enroll in an institution is a consumer transaction.

609. By engaging in the above-described acts and practices, Walden and Laureate have committed one or more acts of unfair and deceptive trade practices.

610. 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 doctoral degree transaction had been supplied in accordance with previous representations made by Walden and/or Laureate to Plaintiff Gardiner and members of the Michigan Subclass, 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 or five dissertation classes; 4) their respective programs could be completed in the promised time, 5) the process for obtaining a dissertation chair and member would be reasonable and not burdensome, and where chairs or members have left, Walden would find replacements; 6) there would be reasonable stability in faculty member retention such that the process for obtaining a dissertation chair and member would not be repeated, much less repeated multiple times; and 7) appropriate and timely feedback (within 14 days) from their dissertation committee would be provided to students with respect to their dissertation work.

611. 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 created 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.

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

613. The misrepresentations and omissions were material to Plaintiff Gardiner and the members of the Subclass.

614. 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.

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

616. As a direct and proximate result of Walden and Laureate's unfair and deceptive practices and acts, Plaintiff Gardiner and the Subclass have suffered and will continue to suffer actual damages. Had Plaintiff Gardiner and the members of the Subclass 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, Plaintiffs and members of the Class and Subclasses request that the Court enter an Order

or judgment against Walden as follows:

- A. Certifying this case as a class action and appointing Plaintiffs and their counsel to represent the Class;
- B. Awarding Plaintiffs and other members of the Class damages and all other relief available under the claims alleged;
- C. Awarding Plaintiffs and other members of the Class pre-judgment and post judgment interest as a result of the wrongs complained of herein;

- D. Awarding Plaintiffs and other members of the Class their costs and expenses in this litigation, including reasonable attorneys' fees and other costs of litigation;
- E. Awarding a trebling of damages where allowed under applicable state law;
- E. Requiring Walden to disgorge the revenue earned through the excessive doctoral dissertation coursework;
- F. Enjoining Walden from engaging further unlawful conduct as described herein;
- G. Awarding Plaintiffs and other members of the Class restitution; and
- H. Awarding such other relief as the Court deems just and proper.

### **JURY DEMAND**

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

REINHARDT WENDORF BLANCHFIELD

Dated: 12/1/2016

By: s/Garrett D. Blanchfield, Jr.  
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# EXHIBIT 1

On Wednesday, August 20, 2008 11:26 AM, Todd Westenskow <[Todd.Westenskow@waldenu.edu](mailto:Todd.Westenskow@waldenu.edu)> wrote:

Hello Kelli,

I am glad to help in any way I can. Unfortunately, the Alumni Office has not gathered the licensure information for each state. I do not personally know of any recent graduates that have become licensed in Washington, or any other state, because the students I have worked with have not completed the program. I began working at Walden University about three years ago.

The various state boards of psychology will not guarantee any person a license until they go through the application process. They often do not guarantee a program will meet the education programs until you go through the process, which is extremely frustrating. So it is always a bit of a gamble.

Programs that have APA accreditation, to some, offers a little comfort, but it is still no guarantee. The states you mention APA in their regulations, still will not guarantee that an application for licensure is approved.

The specializations in which you expressed interest do not lead toward licensure. The Organizational Psychology and General Psychology programs do not include an internship and the courses to meet the state requirements. Only the Clinical or Counseling specializations will lead toward licensure

The PhD in Organizational or General Psychology programs are three to four years in length, with an overall cost of \$55,000 - \$65,000.

The PhD in Clinical or Counseling Psychology programs are four to five years in length, with an overall cost of approximately \$75,000 - \$85,000.

Let me know if you have any other questions. I am in the office on Thursdays until 7:00 pm PT if you would like to speak by phone after regular business hours.

Have a great day!

Todd J. Westenskow  
Enrollment Advisor  
School of Psychology

Toll-free Phone: 866-492-5336, ext. \*2867

Direct Phone: 602-343-2867

Email: [todd.westenskow@waldenu.edu](mailto:todd.westenskow@waldenu.edu)

Fax: 602-343-2898

[www.WaldenU.edu](http://www.WaldenU.edu)

PLEASE NOTE: Official transcripts should be directed to the Walden University Office of Admissions, 650 South Exeter Street, Baltimore, MD 21202

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Academic Offices: 155 Fifth Avenue South, Suite 100, Minneapolis, MN 55401

Administrative Offices: 650 South Exeter Street, Baltimore, MD 21202

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Kelli Callahan <[forensickc@yahoo.com](mailto:forensickc@yahoo.com)>

08/20/2008 12:09 AM

Please respond to  
[forensickc@yahoo.com](mailto:forensickc@yahoo.com)

To: Todd Westenskow <[Todd.Westenskow@waldenu.edu](mailto:Todd.Westenskow@waldenu.edu)>

cc

Subject: Re: What can Walden University do for you?

Hi Todd,

Thank you for all of the information thus far. I had the opportunity to speak today with Chris Fischer about the Public Policy/Management program and I wanted to speak today with you as well however my call with Chris went longer then expected. It is so difficult for me to sneak away during the day for phone calls so I appreciate you answering my questions via email.

I have a question pertaining to the Clinical Psychology Program. Do you know if you Walden has had recent graduates from this program that have successfully obtained licensure within the state of **Washington**?

I reviewed the licensure requirements for the state and even contacted the licensing board however they indicated they could not evaluate (or answer questions) about any academic program without reviewing an official application for licensure. How significant is the APA accreditation? Also, what is the estimated cost range for this program?

Thanks Todd!

Kelli Callahan

--- On **Tue, 8/19/08**, Todd Westenskow <[Todd.Westenskow@waldenu.edu](mailto:Todd.Westenskow@waldenu.edu)> wrote:

From: Todd Westenskow <[Todd.Westenskow@waldenu.edu](mailto:Todd.Westenskow@waldenu.edu)>

Subject: Re: What can Walden University do for you?

To: [forensickc@yahoo.com](mailto:forensickc@yahoo.com)

Date: Tuesday, August 19, 2008, 2:48 PM

Hello Kelli,



The application process usually is completed within one week. My suggestion is to have the application items submitted in mid-November or mid-February at the latest. You can apply for either quarter, and right now the application fee is waived.

### Applying

Please complete our online application:

<https://secure.waldenu.edu/apply/Login.aspx?ReturnUrl=%2fapply%2fDefault.aspx>

Here is what we need for your application packet:

1. Completed Application (**Found through the link above**)
2. Current resume (**You may send by fax or email**)
3. Transcripts (**Please have your school mail an official copy of your graduate transcripts to the PLEASE NOTE address below**)
4. Goal statement, per the guidelines attached (**You may send by fax or email**)

### Financial Aid and Scholarships

Eligibility for most federal student loan programs does not depend on your income. That means you can't make too much or too little to qualify. Below are the steps for applying for financial aid:

1. Obtain a U.S. Department of Education PIN at <http://www.pin.ed.gov> and be sure to provide your email address.
2. Use your PIN to complete and sign the 2008-2009 FAFSA online at <http://www.fafsa.ed.gov> . (Walden University's Title IV code is 025042.)

You can view scholarship information on the following website:

[http://www.waldenu.edu/c/Tuition/8331\\_11158.htm](http://www.waldenu.edu/c/Tuition/8331_11158.htm)

Please let me know if you have any other questions. I am always glad to help.

Have a great day!

Todd J. Westenskow  
Enrollment Advisor  
School of Psychology

Toll-free Phone: 866-492-5336, ext. \*2867

Direct Phone: 602-343-2867

Email: [todd.westenskow@waldenu.edu](mailto:todd.westenskow@waldenu.edu)

Fax: 602-343-2898

[www.WaldenU.edu](http://www.WaldenU.edu)

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Kelli Callahan <[forensickc@yahoo.com](mailto:forensickc@yahoo.com)>  
08/19/2008 02:05 PM

Please respond to  
[forensickc@yahoo.com](mailto:forensickc@yahoo.com)

To Todd Westenskow  
<[Todd.Westenskow@waldenu.edu](mailto:Todd.Westenskow@waldenu.edu)>

cc

Subject Re: What can Walden University do for you?

Hi Todd, thank you for the quick response. How much time should I allot ahead of term start dates for the application process and review? I am shooting for possibly a December or a March start date....

--- On **Tue, 8/19/08**, **Todd Westenskow** <[Todd.Westenskow@waldenu.edu](mailto:Todd.Westenskow@waldenu.edu)> wrote:  
From: Todd Westenskow <[Todd.Westenskow@waldenu.edu](mailto:Todd.Westenskow@waldenu.edu)>  
Subject: Re: What can Walden University do for you?  
To: [forensickc@yahoo.com](mailto:forensickc@yahoo.com)  
Date: Tuesday, August 19, 2008, 1:57 PM

Hello Kelli,

Thank you for your response. I am glad to help in any way I can.

The PhD in Psychology programs in either Educational Psychology or Organizational Psychology are 121 quarter credits and require 20 days of residency. The overall tuition and residency fees for either program would be approximately \$55,000, plus books and travel/lodging for the residencies. The programs start each September, December, March, and June.

I included links for the two programs as well as a link for the residency milestones attended by our PhD students.

Organizational Psychology - [http://www.waldenu.edu/c/Schools/Schools\\_7335.htm](http://www.waldenu.edu/c/Schools/Schools_7335.htm)

Educational Track - [http://www.waldenu.edu/c/Schools/Schools\\_7351.htm](http://www.waldenu.edu/c/Schools/Schools_7351.htm)

PhD Residency information - [http://www.waldenu.edu/c/About/About\\_9597.htm](http://www.waldenu.edu/c/About/About_9597.htm)

Please let me know how I can help further.

Have a great day!

Todd J. Westenskow  
Enrollment Advisor

School of Psychology

Toll-free Phone: 866-492-5336, ext. \*2867

Direct Phone: 602-343-2867

Email: [todd.westenskow@waldenu.edu](mailto:todd.westenskow@waldenu.edu)

Fax: 602-343-2898

[www.WaldenU.edu](http://www.WaldenU.edu)

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**Kelli Callahan** <[forensickc@yahoo.com](mailto:forensickc@yahoo.com)>  
08/19/2008 01:35 PM

Please respond to  
[forensickc@yahoo.com](mailto:forensickc@yahoo.com)

To: Todd Westenskow  
<[Todd.Westenskow@waldenu.edu](mailto:Todd.Westenskow@waldenu.edu)>

cc

Subject: Re: What can Walden University do for you?

Hi Todd,

I am interested in both the Public Policy program in addition to the Psychology program so I have requested information from both. In reference to your questions....

1) My motivation for returning to school is to increase my earning potential. I teach collegiate level courses and will earn more if I possess a doctoral degree.

2) I would like to begin a program at the beginning of the year (Jan 2009).

3) My highest completed level of education is a Master's Degree (Forensic Science).

4) Financing - student loans.

Could I obtain a ballpark figure for the psychology doctoral programs? I am interested in either the general psychology track or possibly the organizational psychology program.

Thank you,

Kelli Callahan

--- On **Mon, 8/18/08**, **Todd Westenskow** <[Todd.Westenskow@waldenu.edu](mailto:Todd.Westenskow@waldenu.edu)> wrote:

From: Todd Westenskow <[Todd.Westenskow@waldenu.edu](mailto:Todd.Westenskow@waldenu.edu)>

Subject: What can Walden University do for you?

To: [forensickc@yahoo.com](mailto:forensickc@yahoo.com)

Date: Monday, August 18, 2008, 3:28 PM

Dear Kelli,

Thank you for your interest in the psychology and counseling programs at Walden University. My name is Todd, and I am your enrollment advisor. I am here to help answer your questions about the Walden program, guide you through the application process, and ensure that your enrollment goes as smoothly as possible.

I look forward to discussing how Walden University can help you meet your educational needs. So that I can be prepared with the information that will be most helpful to you, please reply to this email with answers to the following questions:

- What motivated you to return to school?
- When would you like to begin your program?
- What is your highest completed level of education?
- Have you thought about how you would like to finance your education?

Thank you again for choosing Walden University. I look forward to helping you achieve your educational goals.

Warmest regards,

Todd Westenskow  
Enrollment Advisor

Phone: 866-492-5336, ext. \*2867

Email: [todd.westenskow@Waldenu.edu](mailto:todd.westenskow@Waldenu.edu)

Fax: 602-343-2898

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# EXHIBIT 2

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

## Walden University

### PhD in Psychology

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.

#### 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.

#### 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 \*%.

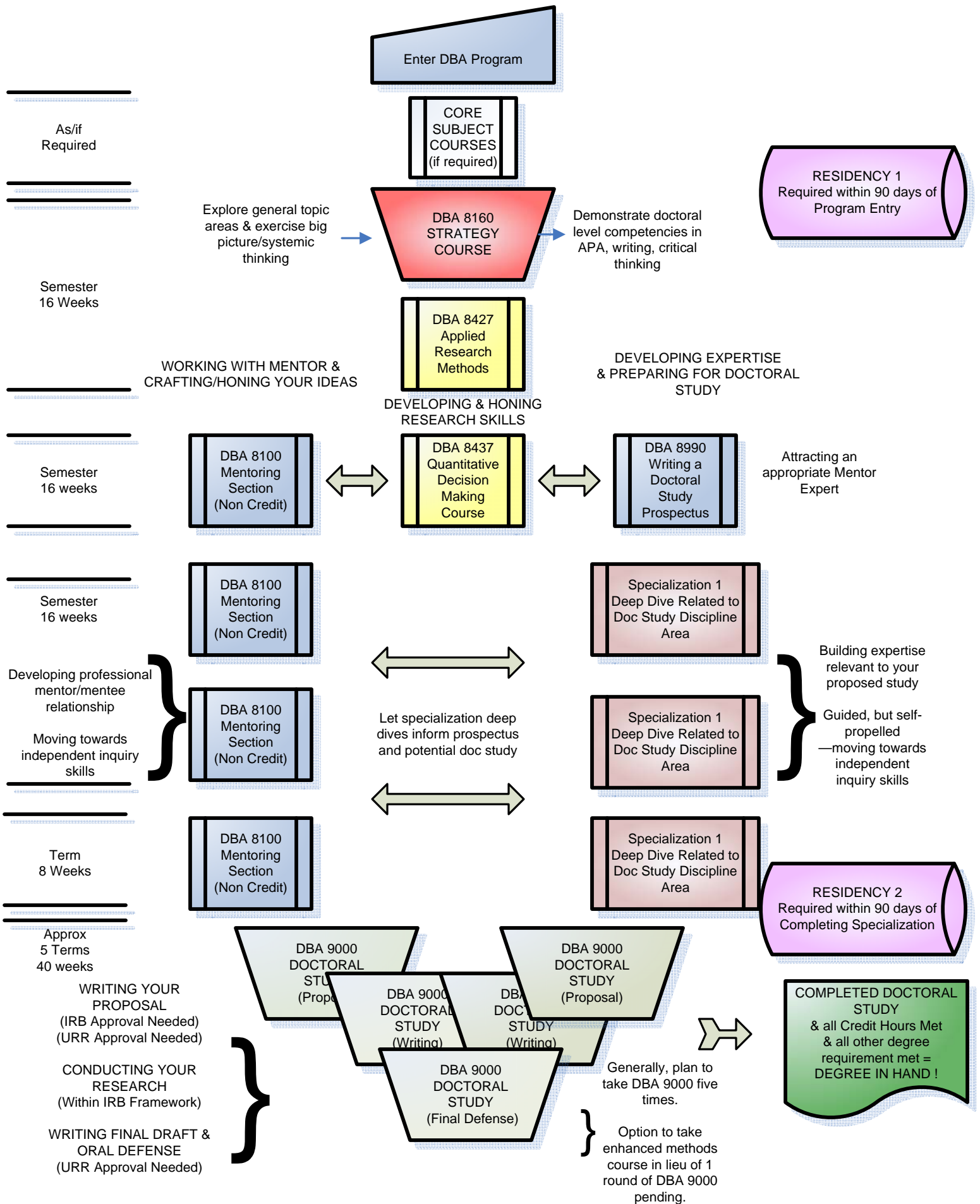
\* This institution is not currently required to calculate a job placement rate for program completers.

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

# EXHIBIT 3



# Developmental Process Flowchart



# EXHIBIT 4

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

## Walden University

### Doctor of Business Admin

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 5

*Important Note Regarding Books and Supplies (Posted 6/22/2016): Walden University recently restructured its processes and the cost of books is no longer included in the cost of tuition as noted on the page created on 4/15/2016 below. This program disclosure page is only updated once annually. Please be advised that there will be additional costs for the price of books for this program.*

[Go back to Walden's Doctor of Education \(EdD\) program](#)

## Walden University

### Doctor of Education

Program Level - Doctoral degree

Program Length - 52 months



#### COST

**Q.** How much will this program cost me?\*

**A.** Tuition and fees: \$59,731  
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 52 months to complete. Of those that completed the program in 2014-2015, 23% finished in 52 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: \$91,189  
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.

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

# EXHIBIT 6

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

## PhD 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.

### 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.

### 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.

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

# EXHIBIT 7



----- Forwarded message -----

From: **Freda Turner** <[Freda.Turner@waldenu.edu](mailto:Freda.Turner@waldenu.edu)>

Date: Mon, Jul 5, 2010 at 8:23 PM

Subject: welcome to DBA 9000 course

To:

First,

I'd like to commend you for reaching the last leg of your doctoral journey. You should be proud of yourself as well as excited and apprehensive. As you know, approximately only 1% of the population attains a doc degree. We recently held a conference call with all faculty that are mentoring in DBA 9000 and wanted to also touch base with you. You are our inaugural group of [students in DBA 9000](#) so we will be learning together and you will never be alone. Our goal is to develop a culture of collaboration.

First, I'd like to provide you with a copy of the PowerPoint that we share at Residency 2 [as it relates to the various items in the doc study, etc.](#) Please review it. Secondly, the documents that you will live by in 9000 are located in a single location at:

<http://researchcenter.waldenu.edu/>

book mark this site. You will be in DBA 9000 a total of 5 sessions (40 weeks) in order to complete all the required things outlined in the process checklist that I have highlighted below. Again, all documents that will be needed are located at the Research center and they are:

#### **D.B.A. Doctoral Study Process and Documents**

- [Chair/Doctoral Study Flowchart](#)
- [Doctoral Study Sequence](#)
- [Process Checklist](#)
- [Chair Process Overview](#)
- [Chair Request Form](#)
- [Doctoral Study Rubric](#)
- [Doctoral Study Template](#)

- [Instructions for Using Template](#)
- [DBA Prospectus Form](#)
- [Available Faculty for Chair/Committees](#)
- [DBA Doctoral Study Visual Outline](#)
- [DBA Doctoral Study Project Outline](#)
- [DBA Doctoral Study FAQ](#)

We will hold 2 conference calls to allow all an opportunity to participate. The first one will be Wednesday, July 7, 2010 at 9 a.m. EST and a second one will be on Sunday evening, July 11 at 9 p.m. EST.

**Conference call in access: [866-391-9390](tel:866-391-9390) access code 56657190#**

Thank you in participating in the highest form of scholarship. We hope to develop a culture of collaboration and scholarship. Fred Walker at [Fred.Walker@waldenu.edu](mailto:Fred.Walker@waldenu.edu) oversees the logistics involved with 8100 and 9000 assignments so please get to know him. ☺ Freda

Freda Turner, Ph.D

DBA Program Director

Walden University

Work: [602-507-7048](tel:602-507-7048) (EST)

Cell [904-210-3927](tel:904-210-3927)

1-800-WALDENU (925-3368) Ext. 1923

Email: [Freda.Turner@Waldenu.edu](mailto:Freda.Turner@Waldenu.edu)

**DBA Leadership Team**

Pamela Smith, Residency & Lead Faculty Administrator at [Pamela.Smith@waldenu.edu](mailto:Pamela.Smith@waldenu.edu)

Fred Walker, FTF/DBA Program Coordinator at [Fred.Walker@waldenu.edu](mailto:Fred.Walker@waldenu.edu)

# EXHIBIT 8

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## Welcome and Introductions

- Welcome to DBA Residency One. This will be an instructor led course that will include discussions, table top exercises, group activities, and homework assignments.
- Faculty Introduction(s)
  - Name
  - Location
  - Business Topic
- Participant Introductions
  - Name
  - Location
  - Topic

## Table Top 3 Minute Activity One

- Route the sign-in sheet and mark through those absent.
- Activity -
  - Write down one concern or issue that you have regarding the DBA processes or program. You do NOT have to include your name.
  - Turn in your concern or issue and we will be reviewing these items throughout the DBA morning sessions.

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## Demystifying the DBA Doctoral Study

### DBA Doctoral Study Process Day 1

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## Objectives of this Presentation

- Evaluate the key components of the Doctoral Study process
- Discuss and examine DBA Doctoral Study Research Center Documents
- Examine the doctoral mentor and learner mentoring process

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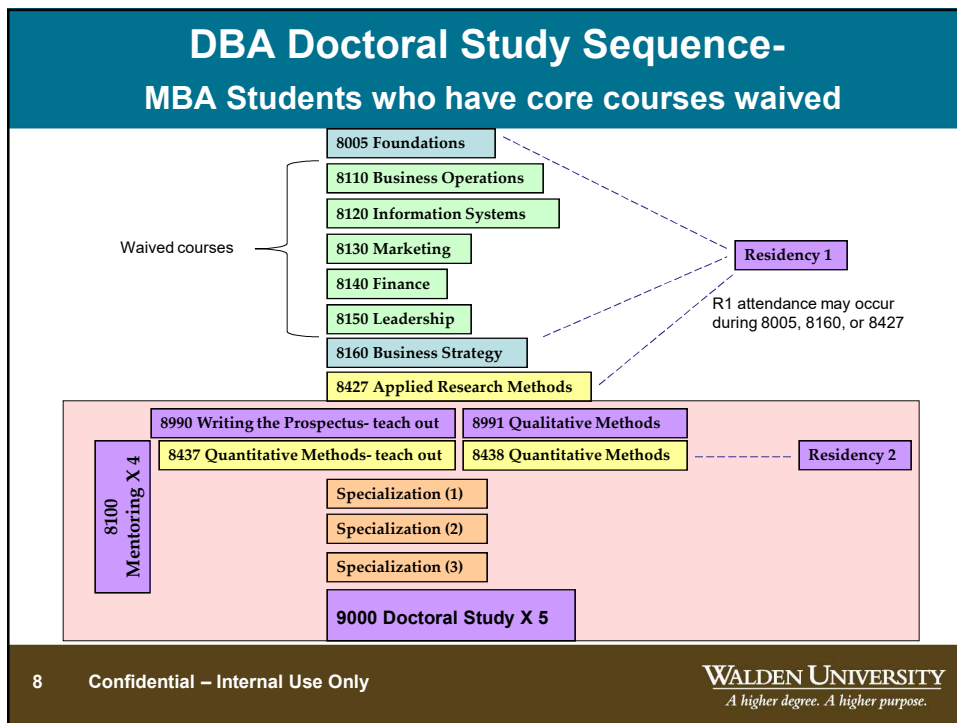
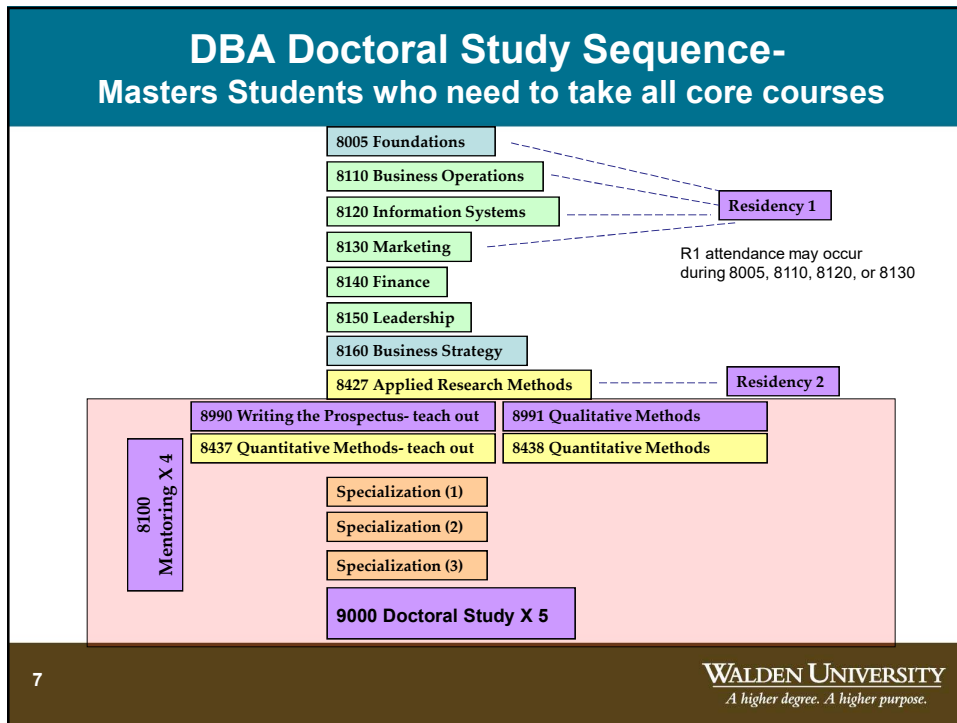
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## What is the DBA Doctoral Study?

- The DBA is a **professional degree** focused on the application of scholarship to **business practices**. The focus of the DBA study is to provide a **scholarly, research-based response** to a **business problem, issue, or practice** and might contribute to social change.

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## DBA Doctoral Study Committee

- Students submit a Faculty Mentor/Chair Request Form during the 2<sup>nd</sup> week of the 8990/8991 class. 8990 or 8991
  - Bookmark Research Center <http://researchcenter.waldenu.edu/>
  - Let us review the [Prospectus / Chair Request Form](#)
  - Let us review the [Available Faculty for Chair/Committees](#)
  - Student notified of faculty chair assignment in week 8 of 8890/8991. Assignment contingent upon faculty load/training.
- Let us review the [Process Checklist](#), the roadmap for the Doctoral Study
- The student and mentor work together in (4) DDBA-8100 sessions. The student will work in 8437 and specialization courses at the same time they are in 8100. Use 8100 effectively, 8100 is graded.
- Note: Two U's in 8100 may result in a dismissal 8100  
Mentoring X 4

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## DBA Doctoral Study Committee Continued...

9000 Doctoral Study X 5

- **Students enter DDBA-9000 upon completion of all coursework and the following steps occur:**
  1. **DDBA8100 Mentor becomes Committee Chair.**  
Let us visit the <http://researchcenter.waldenu.edu/>  
Review the [Process Checklist](#)
  2. **2<sup>nd</sup> committee member and URR are assigned by school**
  3. **Proposal, that is Sections 1 and 2, is developed and approved by Chair, 2<sup>nd</sup> Committee Member, and URR; then an Oral Defense is scheduled with Chair and 2<sup>nd</sup> Committee Member only.**
  4. **Sections One and Two are sent for IRB approval.**
    1. **NOTE: Cannot start data collection until IRB approval – Federally Mandated**

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## DBA Doctoral Study Committee Continued

5. After IRB approval Learner collects data then analyzes it.
6. Section 3 is written.
7. Committee members reviews, approves, and signs documentation that study is scholarly and complete.
8. School review process (URR final eyes) takes place.
9. Form and Style Review (1 out 5 fail due to poor APA)
10. Abstract is written using form is the <http://researchcenter.waldenu.edu/> using [abstract guidelines](#)
11. CAO reviews abstract with a pass, re-work, or study does not meet standards.

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## DBA Doctoral Study 10 Minute Breakout Session

Each group at each table review slides seven and eight plus the [Process Checklist](#). Determine the minimum and maximum number of sessions required to complete a Doctoral Study without going over the allotted time.

Discuss and list where and why delays may occur.

Select a table spokesperson to share your findings with the class.

After 10 minutes review the findings.

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## DBA Topic

- Considerations of a DBA study topic:
  - A gap or problem in a **business** practice
  - Manageable size of the study
  - Expertise needed to complete the study
  - Available information about the topic
  - Student familiarity and interest in the topic
  - Controversy or political sensitivity subject
  - Potential funding
  - Audience
  - Implications upon completion

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## Table Exercise for Topic Examples 10 minutes

- Review each listed topic with the others at the table and determine if the topic would make a good DBA Doctoral Study. If not, why?
  - Sociological Factors that Contribute to Disruptive Behavior in Third Graders
  - Exploring Marketing Strategies in Small Businesses in the United States
  - How Music May Affect Middle School Student Education
  - Motivation Strategies for the Unemployed
  - Recent Healthcare Reform Costs
  - Small Business Computer Skills
  - Ecommerce Issues in Jordan
  - Small Airline Safety Performance and Passenger Ticket prices

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## Table Exercise for Individual Topics 10 minutes

- Networking and communicating with other students is a good way to save time and efforts.
- Spend five minutes sharing your topic with a person sitting near you and listen for feedback from that other person.
- Spend five minutes listening to the topic of a person sitting near you and provide feedback to that person

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## How to Look for Topics

- Go to the Walden Library <http://library.waldenu.edu/>
- Select Research Databases
- Select Management and Business
- Select [ProQuest Dissertations & Theses](#)
- Enter Login Information
- Type in a Topic such as Small Business Marketing

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## Demystifying the DBA Doctoral Study

- End Day 1
  - Written Exam (15 minutes) Include your name on the paper
    1. During what course does a student apply for a Chair?
    2. How many times does a student take DDBA9000?
    3. Where are DBA Doctoral documents located?
    4. What document is used by the student, Chair, 2<sup>nd</sup> Committee member, and URR to evaluate the Doctoral Study?
    5. What document is used as a roadmap to the completion of the Doctoral Study?
  - Turn in your completed written exam with your name

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## Homework Day 1

- Post in your non-residency classroom and complete daily evaluations. Evaluations will be sent to you via email.
- Homework:
  - Download a dissertation on a topic similar to the topic you are considering, not more than 2 years old and not from Walden. Bring the dissertation with you on Day 2
  - Look at the Chapters and headings in the table of contents in the downloaded dissertation.
  - Find the problem statement in the dissertation and be prepared to share it with the class.

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## Day 2

- Change seats to a new group – expand networking
- Route the sign-in sheet and mark those absent.
- Review the written exam
  1. During what course does a student apply for a Chair?
  2. How many times does a student take DDBA9000?
  3. Where are DBA Doctoral documents located?
  4. What document is used by the student, Chair, 2<sup>nd</sup> Committee member, and URR to evaluate the Doctoral Study?
  5. What document is used as a roadmap to the completion of the Doctoral Study?

Q & A regarding the exam?

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## Day 2 continued

- Review the homework assignment by asking the participants at each table to share the topic of their downloaded Dissertation with those others at the table. 10 minutes
- Day Two objective is to start discussing Section One of the Doctoral Study.

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## The DBA Doctoral Study

- Reference the Research Center  
<http://researchcenter.waldenu.edu/>
- Let us look at the [Doctoral Study Rubric](#)
- The Background of the study
  - A brief, well-articulated introduction might include a summary of research literature that substantiates a gap or problem in an business practice.
- Table Exercise – 10 minutes
  - Review the downloaded dissertations to get the context of the introduction.

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## Section 1: Problem Statement – about 150-200 words

General Problem Statement - General Business Problem that exists in business.

- Two citations are required from the literature to establish that a problem exists. One of the citations should be a hook that gains the interest of the reader.
- Example of a hook: Smith (2009) reported that employee turnover in the healthcare industry exceeded 79% across the nation.
- How old should a citation be in the problem statement?
- Who can share a hook from their problem statement?
- How will this relate to business?

(Creswell, 2009, p. 102)

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## Anchor identifies the severity of the business problem

### (Anchor of the problem statement includes a number)

- Example: Jones (2010) reported that 72% of employee turnover in the Healthcare industry is attributed to employee dislike of their bosses (Jones, 2010).

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## Qualitative Problem Statement sample

- Sample **Qualitative** Problem Statement (150-200 words).

Between 1 and 2 million American managers lost their jobs from 2005 to 2009 as organizations restructured and discontinued business (Cameron, Freeman, & Mishra, 2008). From 2009 to 2010, Fortune 1000 companies eliminated 85% of the white collar and middle management workforce (Jones, 2009). The general problem is with a reduction in manager workforce; there could be less corporate knowledge. The focus of this study is to explore competencies needed by middle managers leading the new 21<sup>st</sup> century U.S. workforce. For the purpose of this study, competencies are defined as behavioral characteristics associated with fulfilling job expectations.

Does this example meet the requirements of the Rubric?

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## Quantitative Problem Statement

- Hook and anchor with 2 citation
- This **quantitative** correlation (method/design) study is to examine (variable 1) between (variable 2) within XXXXX (organization) located in geographical location to see if a relationship exists or cause /effect.
- Independent (I (researcher) manipulate)
- Dependent – (what changes when Independent changes)

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## Quantitative Problem Statement Template

- Hook and anchor from the literature with 2 citations as illustrated below

Between **1 and 2 million American managers lost their jobs** from 2005 to 2009 as organizations restructured and discontinued business (Cameron, Freeman, & Mishra, 2008). From 2007 to 2009, Fortune 1000 companies eliminated 85% of the white collar and middle management workforce (Jones, 2009). Based on Corey (2010), the remaining middle managers were left to provide the same additional service with less resources and knowledge. The focus of this quantitative correlational **study** is to analyze the extent of the gap between current manager knowledge and required competencies for organizational success. Competencies are defined as behavioral characteristics associated with fulfilling job expectations as defined by the organization. Data from the study might provide information relating to business and might demonstrate a social impact change by XXX

Does this example meet the requirements of the Rubric?

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## Purpose of the Study

- Review the [Doctoral Study Rubric](#)
- The **purpose statement** of the study clearly describes the intent of the investigation. The Purpose statement is a mini story and should not exceed 250 words and contains six elements.
- What are the six elements?

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## Nature of the Study (Qual, Quant, Mixed Method)

- Reference the [Doctoral Study Rubric](#)
- Justify why you are using a qualitative, quantitative, or mixed method study method—This section should be 1-2 pages.
- Tip: look at other dissertations to see how this might have been described/refined. See notes section.

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## Research Question

- Review the [Doctoral Study Rubric](#)
- Your research **question** should align with the intent of your problem/purpose statement. Qualitative: How or what might XXXXX (in about 10 words)
- Share from downloaded dissertations
- Note: Don't confuse research question(s) (why you are doing the study) with interview/survey questions

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**Table Activity:** in 10 words share **your** research question with table members

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## Hypothesis is only used in Quantitative or Mixed Method Research

- Two types of hypotheses:
  - Experimental
    - If, then, testable
  - Correlational
    - A relationship exists

*\*Remember: The hypotheses is only used in quantitative or mixed method and is guided by the research purpose statement.*

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## Hypothesis

- A hypothesis is an educated guess that is only used for a quantitative or mixed method study
- Steps:
  - List your research question
    - Then list your hypotheses in the scientific format
      - H1o: (there is no)
      - H1a :

*\*Remember: You do NOT need a hypothesis with a qualitative study.*

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## Hypothesis Cont...

- **Experimental Hypothesis** (If, then, testable)
  - If \_\_\_\_ [I do this] \_\_\_\_, then \_\_\_\_ [this] \_\_\_\_ will happen
- H1o: **If** bleach is applied to grass, **then** the grass will **not** die within 7 days (**testable**).
- H1a: **If** bleach is applied to grass, **then** the grass will die within 7 days (**testable**).

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## Hypothesis Cont...

- **Correlational Hypothesis** (relationship exists)
- H1o: There is **no relationship between** women who smoke during pregnancy and premature birth of their children before 266 days of gestation
- H1a: There **is a relationship** between women who smoke during pregnancy and premature birth of their children before 266 days of gestation.

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## Theoretical or Conceptual Theory

- In **quantitative studies**, the theory is called theoretical framework.
- In **qualitative studies**, the theory is called conceptual framework.
- The theory illustrates which ideas from the literature ground the research being conducted. See next slide for examples of theories.

## Sample Theories

- Theories/conceptual frameworks are pre-conceived notions that help explain/predict phenomena and show how your study will be related to existing knowledge

### Examples

Systems Theory

Feminist Theory

Management Theories (<http://www.valuebasedmanagement.net/>)

- Fully describe the theory you select, how it relates to your study, and how it informs the expectations and aspirations of your research. Use more than one scholar perspective. 1-2 pages in length. See notes section.

## Definition of Terms

- List terms in alpha order, include a citation, and only use terms that **might not** be understood by the reader.

### Examples

- **Nascent entrepreneur:** Individuals engaged in start up businesses that are not fully operational or generating cash flow (Menzies, Diochon & Gasse, 2004).
- **Small Business:** An independent business employing less than 500 employees (Small Business Administration, 2006).

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## Assumptions, Limitations, Delimitations

- **Assumptions** are concepts that are accepted as truths.
- **Limitations** are boundaries, exceptions, reservations of the study, i.e. limited to the events in 2000 or in Houston, Texas.
- **Delimitations** are used to narrow the scope of a study is to list what is not included or unintended in the study, i.e. only females will be interviewed.

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## Significance of the Study

- Justify why this study is of value to the practice of business
- How will this study fill a gap in the literature?
- How will this contribute to professional or practitioner application?
- How will your study contribute to positive social change (increase graduation rates, how will stakeholders benefit, decreasing digital divide, what **might** change from your inquiry)?
- Is 1 out of 1,000 individuals be impacted?

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## End Day Two

- End Day 2
  - Written Exam (15 minutes) Include your name on the paper
    1. What are the four elements of the problem statement?
    2. What are the six elements of the purpose statement?
    3. How old should a citation be in the problem statement?
    4. In **qualitative** studies, the theory is called \_\_\_\_\_ framework.
    5. How many research questions should be in a Doctoral Study?
  - Turn in your completed written exam with your name



## Day 2 Homework

- Post in your non-residency classroom and complete daily evaluations. Evaluations will be sent to you via email
- Homework tonight:
  - Work in groups of two or more
    - Count the number of references in the literature review of the downloaded dissertations.
    - How many references were from books?
    - How many references were from online publications?
    - How many references were more than five years old prior to the dissertation publication?
    - How was the literature review organized?

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## Day Three

- Route sign-in sheet and mark through those absent
- Review the Daily Exam
  1. What are the four elements of the problem statement?
  2. What are the six elements of the purpose statement?
  3. How old should a citation be in the problem statement?
  4. In **qualitative** studies, the theory is called \_\_\_\_\_ framework.
  5. How many research questions should be in a Doctoral Study?

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- Review the homework.
  - Count the number of references in the literature review of the downloaded dissertations.
  - How many references were from books?
  - How many references were from online publications?
  - How many references were more than five years old prior to the dissertation publication?
  - How was the literature review organized?
- Day Three Objective: Complete discussion of Section One of the Doctoral Study

## Review of the Literature- Structure Options

- **Chronological Order**
  - When did the term or topic first appear in the literature and what is the history of the issue?
- **Classic Studies on the Topic**
- **Thematically Published**
  - About 60+ references (85% within 5 years of your publication).
  - 85% peer-reviewed.
  - Sections on theoretical framework, methodology, design, pros/cons on topic.
  - Literature review always in past tense (Turner published, this has already occurred)

## Purposes of your literature review?

- Provides a history of studies/publications on your topic. Be comprehensive
- Demonstrates you are well read on your selected topic so you can advance knowledge by standing on the shoulders of other scholars.
- Additions can be added to the literature review until the day the CAO's ink goes on your study.

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## Literature Review

- Comparisons and contrasts & pros/cons of different points of view.
  - Remember that you have to point out those points of similarity and difference, explicitly. This is not an opinion paper.
- Relationship of your study to previous research
- Literature related to the methods is reviewed – for example, of the 15 studies on this topic, 10 used a qualitative approach, etc.

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## Literature Review Matrix – Put in Appendix

|                        | Recent<br>References<br>(within last 5<br>years from<br>anticipated<br>graduation) | Older than 5 years<br>References | Total |
|------------------------|------------------------------------------------------------------------------------|----------------------------------|-------|
| Books                  | 33                                                                                 | 13                               | 46    |
| Dissertations          | 7                                                                                  | 3                                | 10    |
| Peer-Reviewed Articles | 88                                                                                 | 17                               | 105   |
| Web Pages              | 6                                                                                  | 0                                | 6     |
| Other resources        | 2                                                                                  | 0                                | 2     |

## Literature Review

Categorize while reading

- Must relate to your study
- Paraphrase, paraphrase, paraphrase
- Strengths/weaknesses of each study you write about in your literature review (small sample size)

## Literature Review

- Purpose: Stand on shoulders of prior researchers and analyze, evaluate, compare, contrast, interpret, **synthesize** the literature.
- Cluster ideas – just get it in one document initially
- Develop an outline
  - Chronological, by topic, by major study
- Avoid numerous quotations – use your scholarly voice. **Paraphrase** allows avoidance of irrelevant details.
- Remember the 5 year rule (85% within 5 years)

## Literature Review- continued

- Provide an account of what has been published on a topic by accredited scholars and researchers.
- Be organized around and related to a thesis or research question.
- Demonstrate what is known and unknown.
- Identify areas of controversy in the literature.
- Demonstrate need for further research.

## Literature Review Tips

1. Outline to get it organized
2. How would you explain your paper to a friend?
3. Use more sections rather than fewer.
4. Your reader is a slow processor and has the attention span of a gnat.

## Section 1: Summary and Transition

- Summarize key points from each of the sub-sections within the document and provide a transition/introduction to Section 2

### Example

- The focus of this section was to present xxxxx. The background section presented that XxXX.

In Section 2, xxxxx will be introduced.

## Practice being a Faculty

In groups of 2, evaluate a downloaded dissertation that is not more than 2 years old and is in APA format. It can not be from Walden. It should relate to your area of interest.

Evaluate:

Title of study-length - 12 words

Geographical location where study occurred

Type of population and size of sample

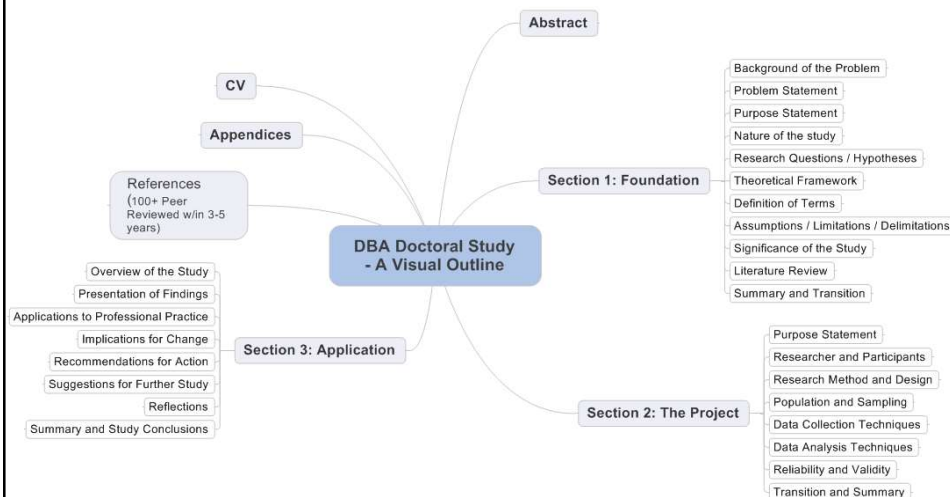
Would the dissertation meet the requirements of the DBA Rubric?

Would you sign off on the dissertation using the DBA Rubric?

Would you be able to self evaluate your Doctoral Study using the Rubric?

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## DBA Doctoral Study



## The URR and Chief Academic Officer sign off on your study



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## Resources to help you

- **Walden APA:** <http://writingcenter.waldenu.edu/APA.htm>
- **Preparing an abstract:** [http://inside.waldenu.edu/c/Files/DocsWritingCenter/Abstract\\_guidelines.doc](http://inside.waldenu.edu/c/Files/DocsWritingCenter/Abstract_guidelines.doc)
- **Walden Writing Center**  
<http://writingcenter.waldenu.edu/>
- **English as a Second Language (ESL) Resources**  
[http://inside.waldenu.edu/c/Student\\_Faculty/StudentFaculty\\_1455.htm](http://inside.waldenu.edu/c/Student_Faculty/StudentFaculty_1455.htm)
- **Walden Academic Residencies**  
[http://inside.waldenu.edu/c/Student\\_Faculty/StudentFaculty\\_929.htm](http://inside.waldenu.edu/c/Student_Faculty/StudentFaculty_929.htm)
- **Resources for Walden Students**  
[http://inside.waldenu.edu/c/Student\\_Faculty/StudentFaculty\\_12439.htm](http://inside.waldenu.edu/c/Student_Faculty/StudentFaculty_12439.htm)
- **Walden Disability Services and Resources**  
[http://inside.waldenu.edu/c/Student\\_Faculty/StudentFaculty\\_1638.htm](http://inside.waldenu.edu/c/Student_Faculty/StudentFaculty_1638.htm)
- **Walden University Library**  
[http://inside.waldenu.edu/c/Student\\_Faculty/StudentFaculty\\_605.htm](http://inside.waldenu.edu/c/Student_Faculty/StudentFaculty_605.htm)
- **Walden University Online Peer-reviewed Journals**  
Walden has several peer-reviewed journals sponsored to which you are invited to submit submissions for consideration for publication. Here are the links to those journals.  
[Journal of Social, Behavioral, and Health Sciences](#)  
[International Journal of Applied Management and Technology](#)
- **Various forms needed by students** [http://inside.waldenu.edu/c/Files/DocsSOM/DBA\\_Mentor-Chair\\_Request\\_Form.doc](http://inside.waldenu.edu/c/Files/DocsSOM/DBA_Mentor-Chair_Request_Form.doc)
- **To view faculty available to mentor**  
[http://inside.waldenu.edu/c/Files/DocsSOM/Available\\_Faculty\\_Mentors.pdf](http://inside.waldenu.edu/c/Files/DocsSOM/Available_Faculty_Mentors.pdf)

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## Additional Resources for our DBA students

- Skype.com (May be illegal in some countries)
- Procite.com(has merged with Endnote)
- Endnote.com
- Talkbox.com
- Grammarly -Walden writing center

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## Review Concerns

- Recall from Day One
  - Write down one concern or issue that you have regarding the DBA processes or program. You do NOT have to include your name.
  - Turn in your concern or issue and we will be reviewing these items throughout the DBA morning sessions.
- Review the submitted concerns or issues regarding the DBA processes or program.

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## Final Test Questions

- End Day 3
    - Written Exam (15 minutes) Include your name on the paper
1. How are 8100 and 9000 courses graded? Letter grade or S/U?
  2. At what point in the program does the DBA student submit a chair request form? When does the student hear back?
  3. What happens if a DBA student receives two unsatisfactory grades in DDBA8100 or DDBA9000?
  4. How many Faculty members make up a Doctoral Study Committee?
  5. What document is used by the student, chair, 2<sup>nd</sup> committee member, and URR to measure the doctoral study? Where is the document located?
  6. How many calendar days does a URR have from receiving the Doctoral Study to returning the Doctoral study?
  7. Explain using the Tutors and APA Editor
  8. How many elements are required for the Problem statement and about how long should a problem statement be? Where does it say this?
  9. Describe one item that you know now that would have helped you if you had known it when you started the DBA program.
- Turn in your completed written exam with your name

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## Break and then rest of class work on your problem statement and/or Section One

- Post in your classroom and complete evaluations
- Use format in this slide presentation to formulate their own problem statement. Start with researching the literature and find the 2 citations that anchor/establish a problem exists.
- The general problem (aka hook with citation), i.e. Unemployment in the U.S. has increased by \_\_\_\_% (citation).
- The specific problem (anchor citation), i.e. unemployment in the healthcare industry has increased by \_\_\_\_% (citation).

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# EXHIBIT 9

NEWS &gt; U.S. NEWS

WORLD INVESTIGATIONS CRIME &amp; COURTS ASIAN AMERICA LATINO NBCBLK

NEWS OCT 6 2016, 5:18 PM ET

## For-Profit Walden U., Once Tied to Bill Clinton, Put Under Review

by ANNA R. SCHECTER

SHARE



Minnesota education officials have launched a review of online PhD programs at a for-profit college with ties to former President Bill Clinton.

"We have seen an increased number of complaints related to dissertations at Walden University," Sandy Connolly of the Minnesota Office of Higher Education (MOHE) told NBC News.

The review follows an NBC News report on Minneapolis-based Walden, including interviews with some students who felt victimized by its practices and were saddled with large student loans.

### Related: Hillary Blasts For-Profit College, But Bill Took Millions From One

Walden is the U.S. flagship of Laureate Education, which paid "honorary chancellor" Bill Clinton \$17.6 million over five years before he stepped down in 2015 just ahead of wife Hillary Clinton's presidential campaign run.

Elizabeth Talbot, manager of Institutional Legislation and Licensing at the Minnesota Office of Higher Education, said the agency is conducting "a qualitative and a quantitative analysis" of student complaints and comparing it to Walden's marketing materials.

"I want to make sure the proof is in the pudding that their marketing claims match with student outcome," Talbot said.

"Is it a policy issue, a culture issue or is it something more nefarious? And we don't know until we complete the program review."

She said that after the NBC News report in August, there was an increase in the number of individuals contacting her office and the state Attorney General's office about Walden.

Some of the Walden students interviewed by NBC claimed they were misled about how long it would take to get a dissertation approved and earn a doctorate and ended up with more debt than they anticipated.

Minnesota officials did not provide any details of the complaints it received, but Connolly said that based on the "number and nature" of them, "we are conducting a full program review of all online doctorate programs."

Dr. Kevin Kinser, head of Penn State's Department of Education and Policy Studies, said Minnesota's action is not surprising.

"What we've seen is state-level oversight, particularly of online, for-profit higher education, has become more robust — even more robust than the federal government, and certainly more than the accrediting agencies," Kinser said.


While Bill Clinton has earned \$22 million from for-profit education institutions — \$17.6 of that from Laureate — his wife has been a vocal critic of for-profit schools, including her opponent's Trump University.

"Hillary Clinton has made it clear that all for-profit institutions should be held to the same standards and she will crack down on law-breaking for-profits by expanding support for federal regulators to enforce laws against deceptive marketing, fraud, and other illegal practices," a spokesman said in August.

On Wednesday, two law firms filed a suit against Walden in the Southern District of Ohio on behalf of lead plaintiff LaTonya Thornhill, a former graduate student at Walden. Attorney Paul Lesko said Thornhill, who was a doctoral student in management from 2011 to 2015, reached out after the NBC News report aired, and the Lambert Law Firm and the Peiffer Rosca Wolf firm drew on the NBC story to aid their investigation.

Thornhill's suit, which seeks class action status, alleges that Walden tells students they will complete a dissertation in 18 months and incur \$70,000 in fees, when the time to complete the dissertation is much longer and the debt accrued much larger.

"Students who believed they were getting ever closer to obtaining their doctoral degree," alleges the suit, "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."

In a statement, Walden President Jonathan Kaplan defended the school's "decades-long track record as one of the nation's leading universities committed to working professionals. Our multiple professional accreditations, extensive list of highly-regarded alumni, and continually low cohort default rates speak for themselves. We can't comment on pending litigation, but it is unfortunate that NBC News chose not to report that the lawsuit mentioned involves a single student and that the complaints to MOHE represent well under 1/10th of 1 percent of Walden's students." 



ANNA R. SCHECTER 

TOPICS U.S. NEWS, EDUCATION, INVESTIGATIONS, POLITICS NEWS

FIRST PUBLISHED OCT 6 2016, 5:18 PM ET

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# EXHIBIT 10

## 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.<sup>2911</sup> 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.

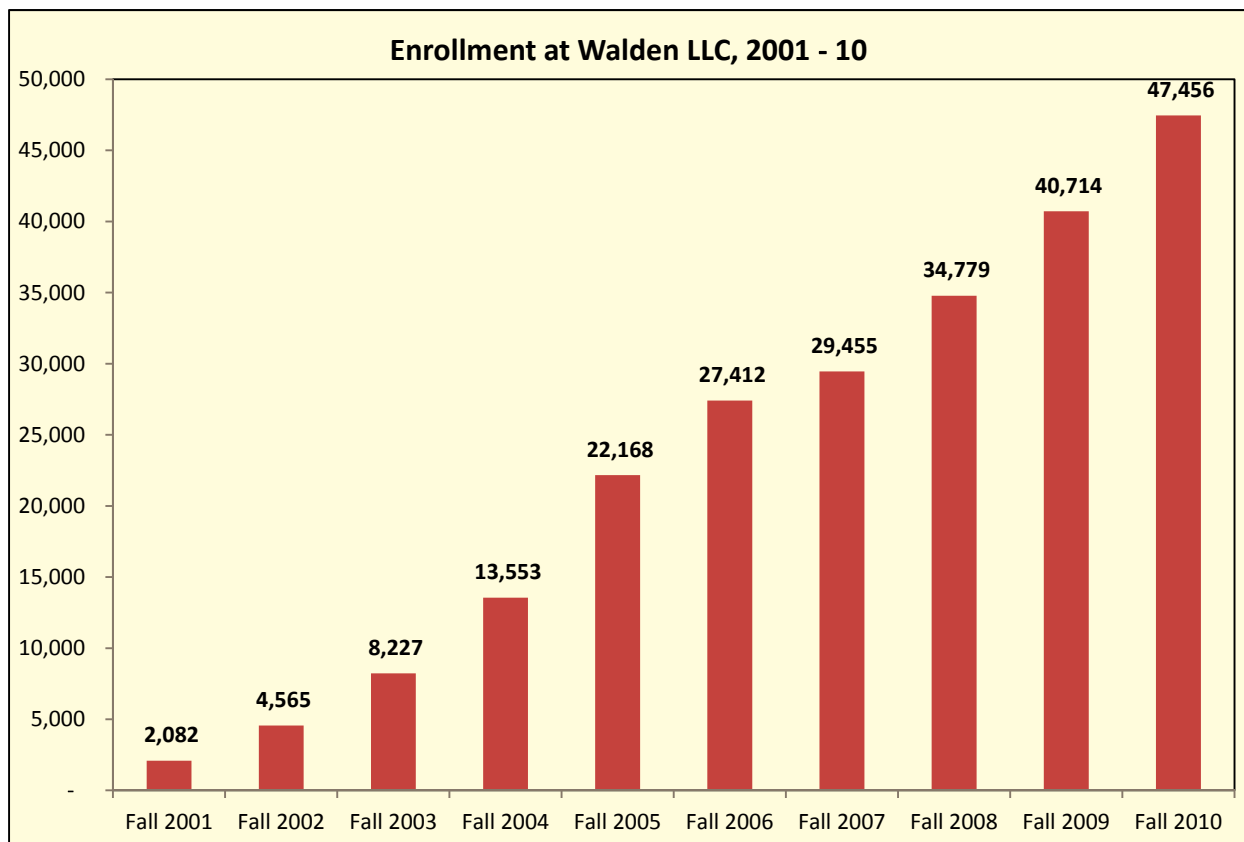
The majority of Laureate's for-profit college holdings are international. Walden is the primary domestic for-profit college owned by the company. Today, Walden University operates exclusively online and offers Bachelor's degrees, as well as a variety of Master's programs in education, health and business, 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.

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<sup>2911</sup> 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.<sup>2912</sup> 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.<sup>2913</sup>

### 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.<sup>2914</sup> Together, the 30

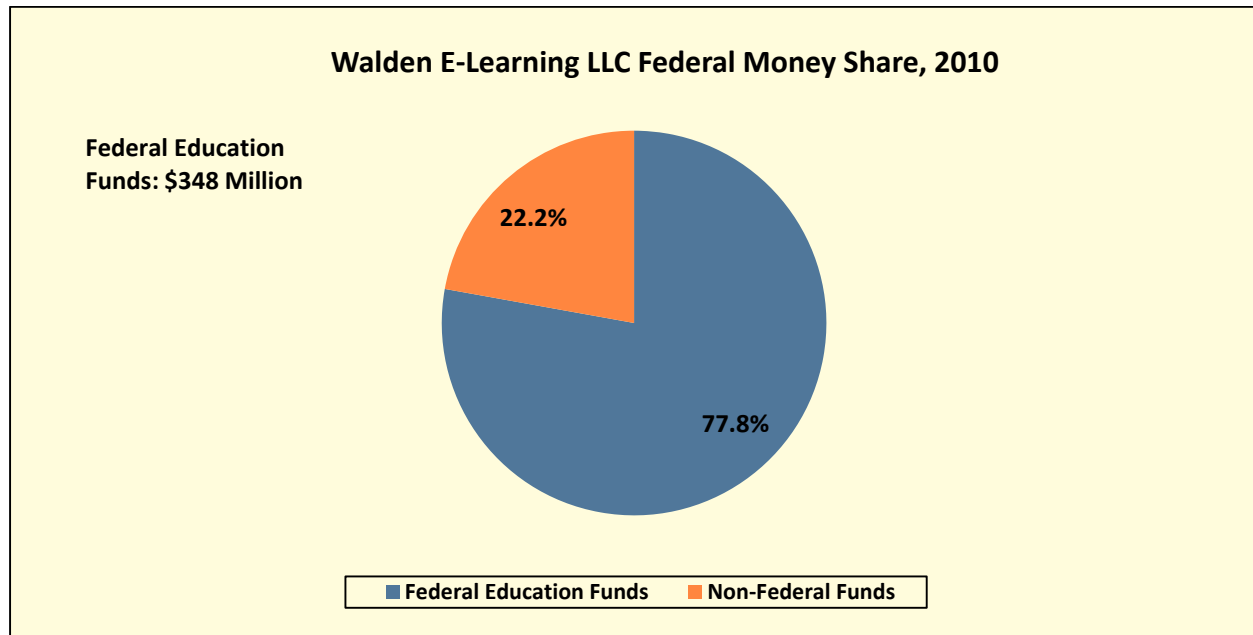
<sup>2912</sup> Enrollment is calculated using fall enrollment for all unit identifications controlled by the company for each year from the Department of Education's Integrated Postsecondary Data System (hereinafter IPEDS). See Appendix 7. The most current enrollment data from the Department of Education 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.

<sup>2913</sup> 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.

<sup>2914</sup> 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.<sup>2915</sup>

In 2010, Walden reported 76.4 percent of revenue from Federal financial aid programs.<sup>2916</sup> However, this amount does not include revenue received from the Departments of Defense and Veterans Affairs education programs.<sup>2917</sup> 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.<sup>2918</sup> With these funds included, an estimated 77.8 percent of Walden's total revenue was comprised of Federal education funds.<sup>2919</sup>



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

<sup>2915</sup> 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.

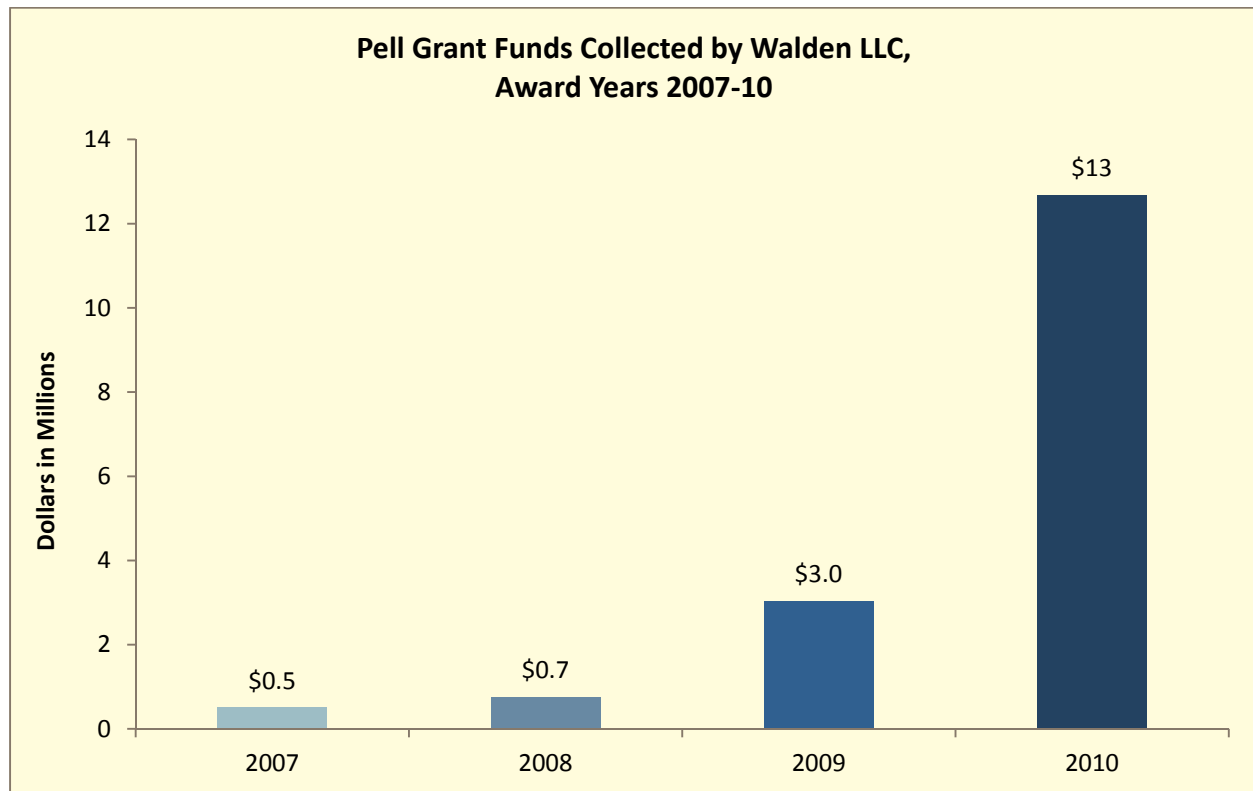
<sup>2916</sup> Id.

<sup>2917</sup> 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.

<sup>2918</sup> 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.

<sup>2919</sup> "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.<sup>2920</sup> 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.<sup>2921</sup>

## 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.<sup>2922</sup> During

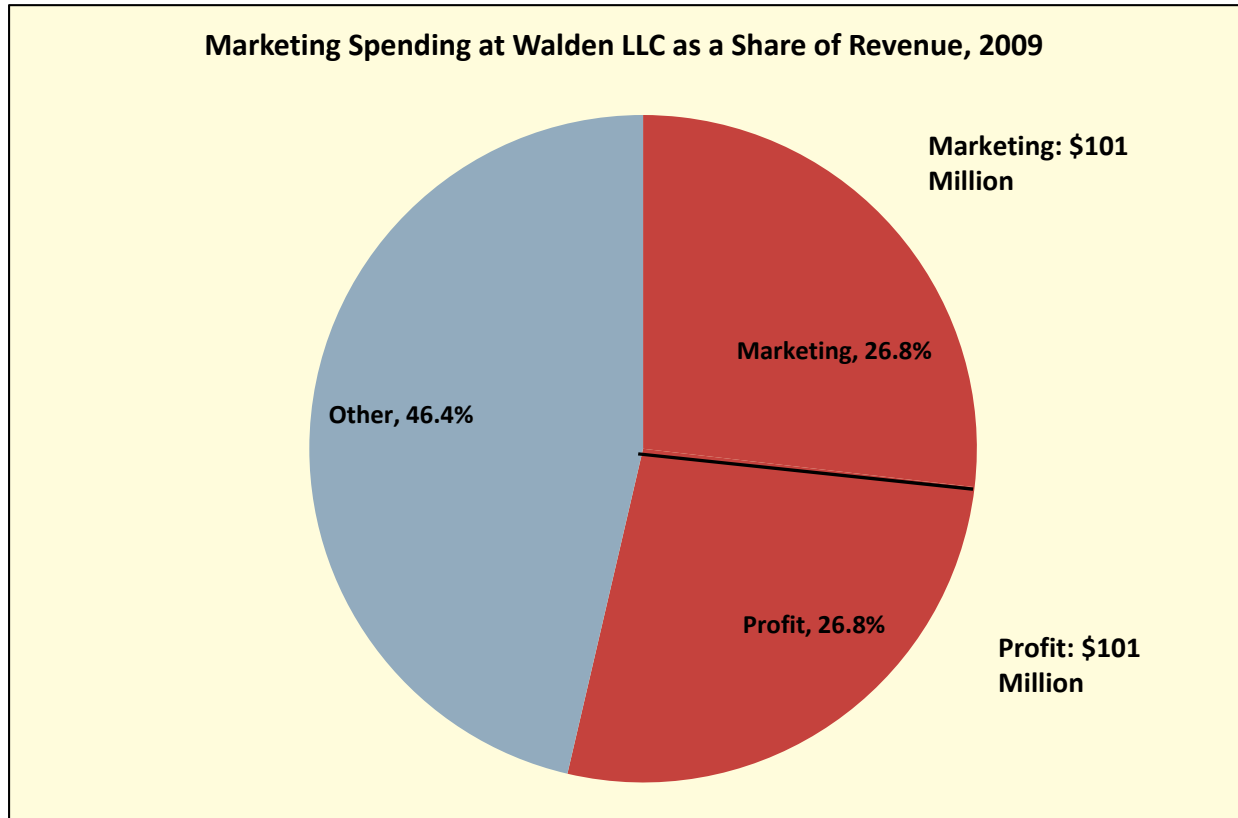
<sup>2920</sup> Senate HELP Committee staff analysis of U.S. Department of Education, Federal Student Aid Data Center, *Title IV Pell Grant Program Volume Reports by School*, 2001-2 and 2010-11, <http://federalstudentaid.ed.gov/datacenter/programmatic.html>

<sup>2921</sup> 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.

<sup>2922</sup> 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).<sup>2923</sup>

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.<sup>2924</sup> The percentage of revenue Walden allocates to both marketing and profit exceeds the for-profit sector average.<sup>2925</sup> On average, the 30 for-profit schools examined spent 22.7 percent of revenue on marketing and 19.4 percent on profit.<sup>2926</sup>



In 2009, Walden devoted 58 percent of its total revenue, or \$202 million, to marketing, recruiting and profit.<sup>2927</sup> 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.<sup>2928</sup>

<sup>2923</sup> 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.

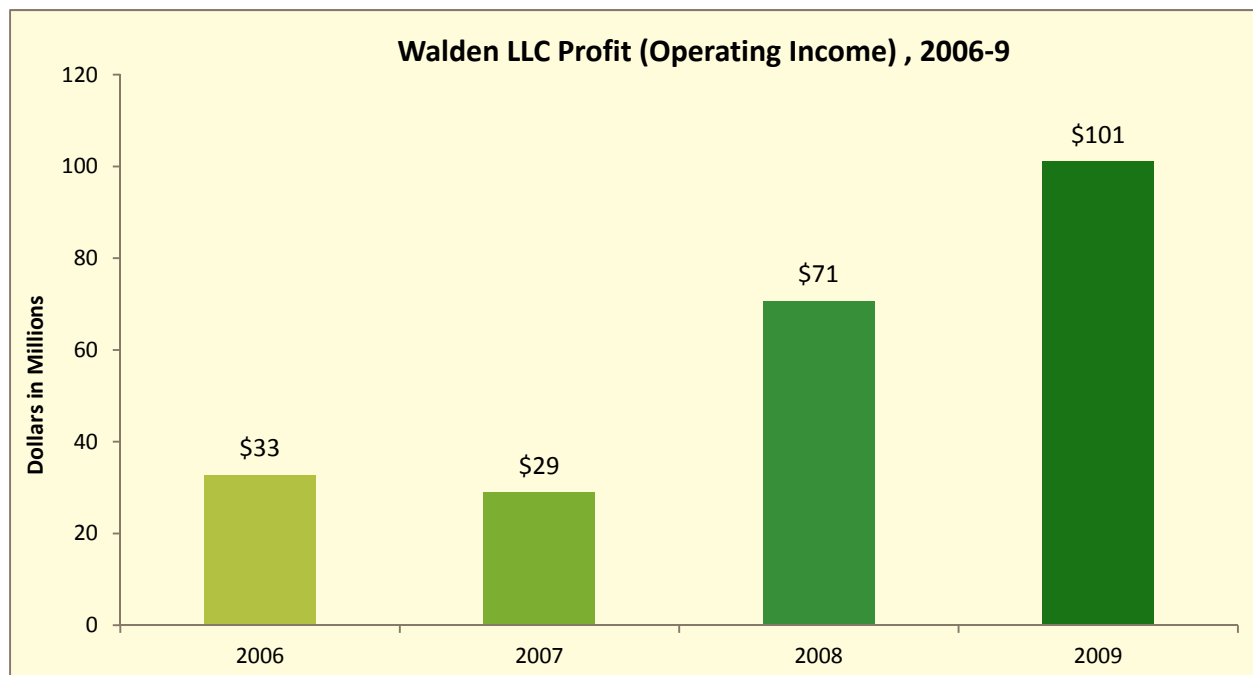
<sup>2924</sup> Id.

<sup>2925</sup> 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.

<sup>2926</sup> Senate HELP Committee staff analysis. See Appendix 19.

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

<sup>2928</sup> 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**

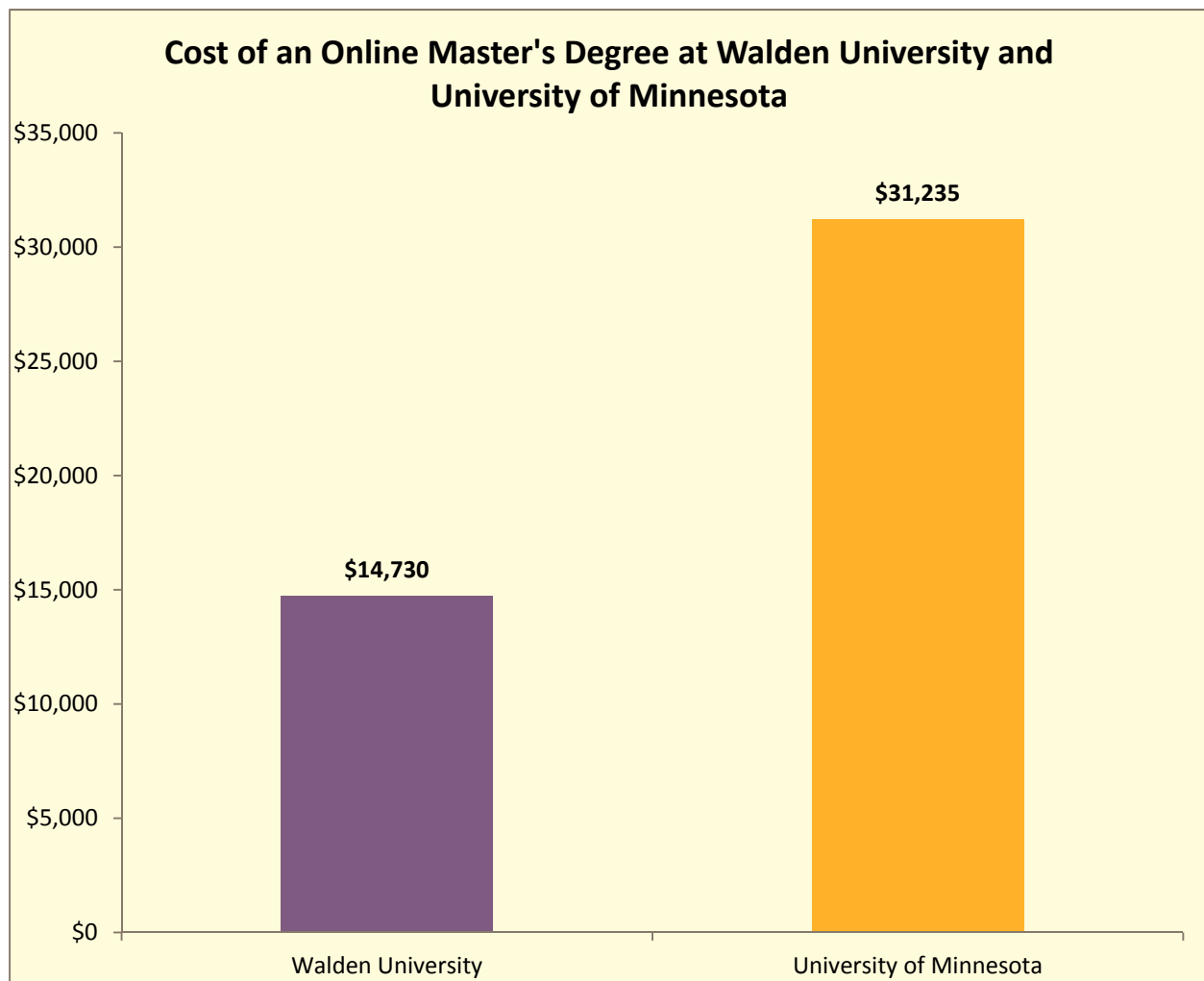
Unlike many of the for-profit colleges the committee examined, when compared to its online public and non-profit counterparts, Walden is competitively priced. A Master's in Education at Walden University costs \$14,730.<sup>2929</sup> The same online degree at University of Minnesota costs \$31,235.<sup>2930</sup> An online Bachelor of Science in Business Administration degree at Walden University costs \$56,800.<sup>2931</sup> The same degree at the University of Minnesota costs \$56,240.<sup>2932</sup>

<sup>2929</sup> 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.

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

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

<sup>2932</sup> *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.<sup>2933</sup> 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

<sup>2933</sup> 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.<sup>2934</sup> 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.<sup>2935</sup>

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.”<sup>2936</sup> 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.”<sup>2937</sup> 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.<sup>2938</sup> Other internal emails announce and discuss additional employee contests and recognition events.<sup>2939</sup>

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.<sup>2940</sup> 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.<sup>2941</sup>

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.<sup>2942</sup>

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.<sup>2943</sup>

<sup>2934</sup> 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].

<sup>2935</sup> Id. at WALDEN-HELP-0006443.

<sup>2936</sup> 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.

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

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

<sup>2939</sup> 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].

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

<sup>2941</sup> Id., at WALDEN-HELP-0037432.

<sup>2942</sup> 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.<sup>2944</sup>

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.<sup>2945</sup> 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.<sup>2946</sup> These students also withdrew within a median of 3 months.<sup>2947</sup> Compared to the sector-wide Bachelor’s withdrawal rate of 54.3, fewer students withdrew from Walden.<sup>2948</sup>

| 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.

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

<sup>2944</sup> 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](http://advocacy.collegeboard.org/sites/default/files/09b_552_PolicyBrief_WEB_090730.pdf) (accessed June 22, 2012).

<sup>2945</sup> 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.

<sup>2946</sup> Id.

<sup>2947</sup> Id.

<sup>2948</sup> 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.<sup>2949</sup> 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."<sup>2950</sup> To address these concerns, in December 2010 Walden instituted a conditional admission policy for undergraduate students, the Adequate Academic Progress policy.<sup>2951</sup> 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.<sup>2952</sup>

### 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.<sup>2953</sup>

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.<sup>2954</sup> In contrast, 1 student in 11 at public and non-profit schools defaulted within the same period.<sup>2955</sup> On the whole, students who attended for-profit schools default at nearly three times the rate of students who attended other types of institutions.<sup>2956</sup> 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.<sup>2957</sup> This change represents a 32.6 percent increase over 4 years.<sup>2958</sup> 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.<sup>2959</sup>

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

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

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

<sup>2952</sup> *Id.*

<sup>2953</sup> 34 CFR § 668.183(c).

<sup>2954</sup> 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.

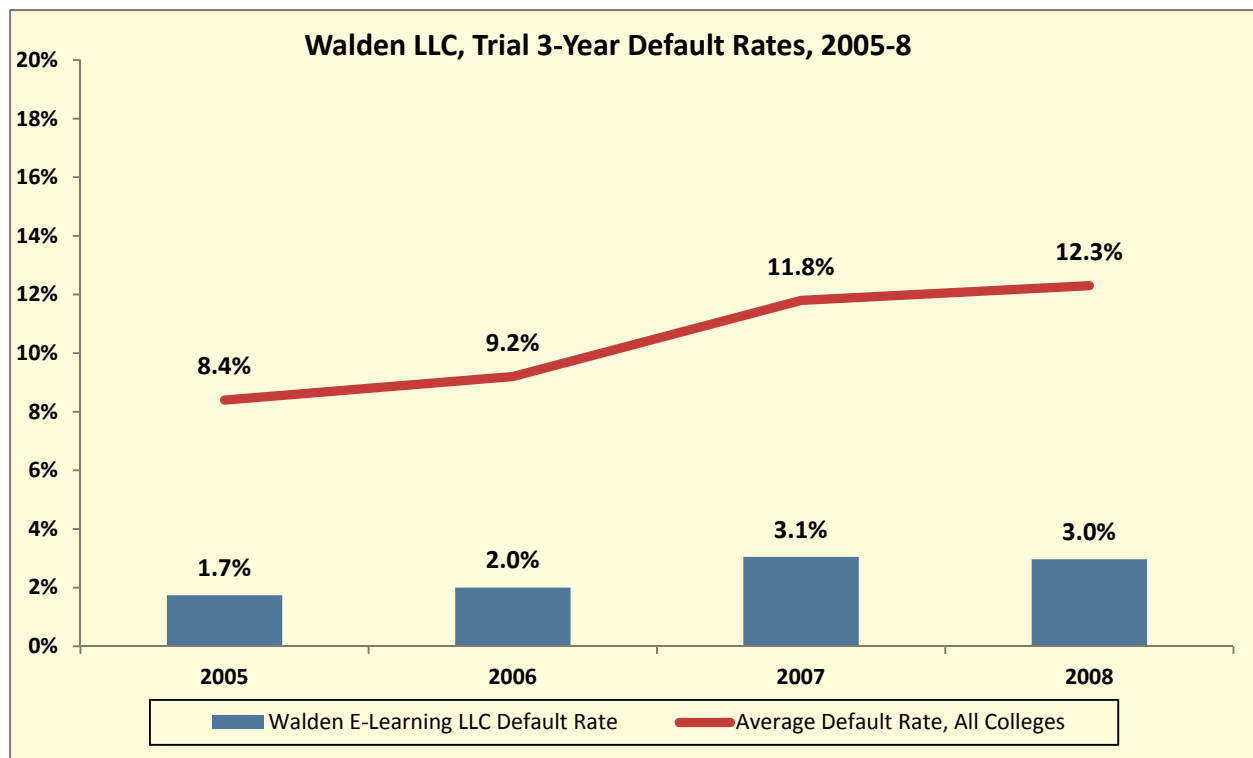
<sup>2955</sup> *Id.*

<sup>2956</sup> *Id.*

<sup>2957</sup> 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.

<sup>2958</sup> *Id.*

<sup>2959</sup> *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.<sup>2960</sup>

## 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.<sup>2961</sup> 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.<sup>2962</sup> By comparison, public and non-profit schools, generally spend a higher amount per student on instruction. On a per

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

<sup>2961</sup> 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.

<sup>2962</sup> *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.<sup>2963</sup>

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.<sup>2964</sup> Walden, however, has more than 90 percent of its faculty employed part-time.<sup>2965</sup> In 2009, Walden employed 153 full-time and 1,848 part-time faculty.<sup>2966</sup>

## 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.<sup>2967</sup> 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.

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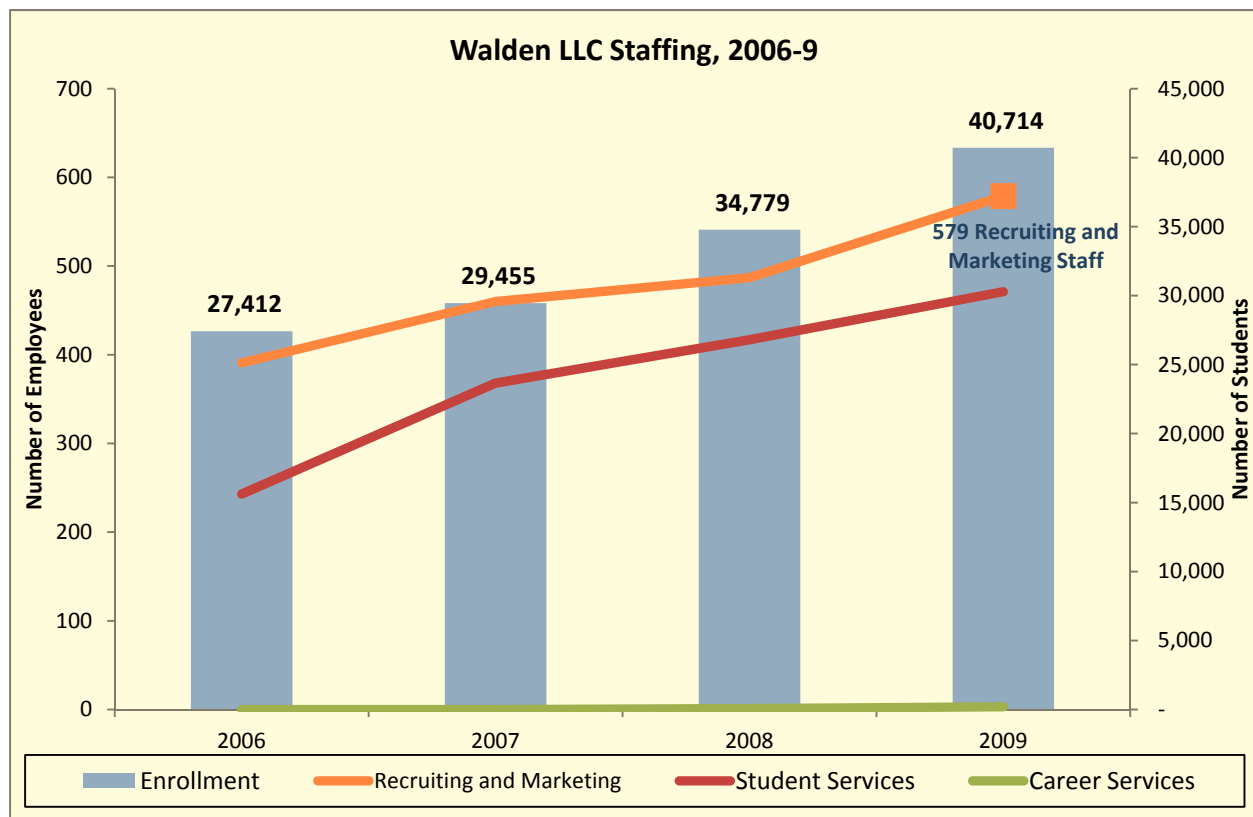
<sup>2963</sup> Senate HELP Committee staff analysis. See Appendix 23. Many for-profit colleges enroll a significant number of students in online programs. In some cases, the lower delivery costs of online classes — which do not include construction, leasing and maintenance of physical buildings — are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

<sup>2964</sup> 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.

<sup>2965</sup> Id.

<sup>2966</sup> Id.

<sup>2967</sup> 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 11



## Doctor of Business Administration (D.B.A.)

Email Print Share

Walden's Doctor of Business Administration (D.B.A.) degree program is designed for experienced business professionals who want to translate their industry expertise into leadership positions as consultants or as executives within their organizations.

Developed with insights from [experienced faculty members](#) and leading business practitioners, the D.B.A. program emphasizes advanced decision making and leadership skills, in-depth knowledge of both theory and applied research, and the ability to manage positive social change. Explore some of the greatest challenges and opportunities facing business today, including globalization, ethics, and managing stakeholder relationships, as well as management issues directly related to your professional interests.

Walden University's Doctor of Business Administration (D.B.A.) program is accredited by the Accreditation Council for Business Schools and Programs (ACBSP). Among other benefits, [ACBSP accreditation](#) provides:

- Validation that your program meets nationally recognized standards of quality endorsed by businesses, government, and other organizations.
- Assurance that your program can provide you with the skills you need to compete in today's global marketplace.
- Recognition by employers, graduate schools, and regulatory organizations.

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### What Students Say

"The most rewarding aspect of pursuing my degree at Walden University is that I am learning something new in every class, each and every week. I am getting an extremely valuable education."

Alvin S. Perry

Doctor of Business Administration (D.B.A.)  
Student

prev next

| CURRICULUM | TUITION AND FEES | CAREER OPTIONS | HIGHLIGHTS | LEARNING OUTCOMES | PROGRAM DATA | LEARN MORE |
|------------|------------------|----------------|------------|-------------------|--------------|------------|
|------------|------------------|----------------|------------|-------------------|--------------|------------|

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 Doctor of Business Administration (D.B.A.) 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](http://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* |
|----------------------------------------------------|------------------|
| Marketing Managers                                 | 11-2021          |
| Computer and Information Systems Managers          | 11-3021          |
| Industrial Production Managers                     | 11-3051          |
| Transportation, Storage, and Distribution Managers | 11-3071          |
| Managers, All Other                                | 11-9199          |
| General and Operations Managers                    | 11-1021          |
| Management Analysts                                | 13-1111          |
| Market Research Analysts and Marketing Specialists | 19-3021          |
| Business Teachers, Postsecondary                   | 19-3021          |

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

**Program Completion**—This program had fewer than 10 graduates during July 1, 2010, to June 30, 2011. As a result, Walden does not disclose this information in order to protect students' privacy per U.S. Department of Education guidelines.

**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   | \$61,850       |
| Books and Supplies | \$0            |
| Room and Board     | Not applicable |

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

**Median Loan Debt**—This program had fewer than 10 graduates during July 1, 2010, to June 30, 2011. As a result, Walden does not disclose this information in order to protect students' privacy per U.S. Department of Education guidelines.



# EXHIBIT 12



Doctor of Business Administration (D.B.A.)

Email

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Walden’s Doctor of Business Administration (D.B.A.) degree program is designed for experienced business professionals who want to translate their industry expertise into leadership positions as consultants or as executives within their organizations.

Developed with insights from [experienced faculty members](#) and leading business practitioners, the D.B.A. program emphasizes advanced decision making and leadership skills, in-depth knowledge of both theory and applied research, and the ability to manage positive social change. Explore some of the greatest challenges and opportunities facing business today, including globalization, ethics, and managing stakeholder relationships, as well as management issues directly related to your professional interests.

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- Validation that your program meets nationally recognized standards of quality endorsed by businesses, government, and other organizations.
- Assurance that your program can provide you with the skills you need to compete in today’s global marketplace.
- Recognition by employers, graduate schools, and regulatory organizations.



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CURRICULUM

TUITION AND FEES

CAREER OPTIONS

HIGHLIGHTS

LEARNING OUTCOMES

PROGRAM DATA

LEARN MORE

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 Doctor of Business Administration (D.B.A.) 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. 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* |
|----------------------------------------------------|------------------|
| Marketing Managers                                 | 11-2021          |
| Computer and Information Systems Managers          | 11-3021          |
| Industrial Production Managers                     | 11-3051          |
| Transportation, Storage, and Distribution Managers | 11-3071          |
| Managers, All Other                                | 11-9199          |
| General and Operations Managers                    | 11-1021          |
| Management Analysts                                | 13-1111          |
| Market Research Analysts and Marketing Specialists | 19-3021          |
| Business Teachers, Postsecondary                   | 19-3021          |

\*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 | 97.1%      |

**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   | \$54,530       |
| Books and Supplies | \$0            |
| 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   |
|------------------------------|----------|
| Title IV Program Loans       | \$56,288 |
| Private Educational Loans    | \$0      |
| Institutional Financing Plan | \$0      |



# EXHIBIT 13



## Doctor of Business Administration (DBA)

Request Information



### Explore our Doctor of Business Administration from Walden

#### OVERVIEW

#### TUITION AND FEES

#### CAREER OPTIONS

#### HIGHLIGHTS

#### FACULTY

#### LEARNING OUTCOMES

| Curriculum Component | Requirements                   | Cost                                                                                                                   | Total*   |
|----------------------|--------------------------------|------------------------------------------------------------------------------------------------------------------------|----------|
| Tuition              | 60 total semester credit hours | \$950 per semester hour                                                                                                | \$57,000 |
| Residency Fee        | Two residencies                | \$1,275 each through 12/31/15<br>\$1,320 each beginning 1/1/16<br>(travel, lodging, and other expenses are additional) | \$2,640  |
| Technology Fee       | Per semester                   | \$165                                                                                                                  | \$1,650  |
|                      |                                | Total                                                                                                                  | \$61,290 |
|                      |                                | Transfer up to 30 credits                                                                                              | \$29,325 |
|                      |                                | Total With Transfer Credits†                                                                                           | \$31,965 |

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.

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

#### 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.](#)

#### Currency Conversion

[Google](#) and [Yahoo](#) offer easy-to-use online currency converters.

## Request Information

Live outside the U.S.?

What is your program of interest? \*

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 DBA program offers a variety of specializations to help you meet your personal and professional goals.

- Accounting
- Energy Management
- Entrepreneurship
- Finance
- Global Supply Chain Management
- Healthcare Management
- Homeland Security
- Human Resource Management

- Information Systems Management
- International Business
- Leadership
- Marketing
- Project Management
- Self-Designed
- Social Impact Management
- Technology Entrepreneurship

### Scholar of Change



Hear how Heather Hefner, PhD in Psychology graduate, is supporting at-risk youth.

[Watch her story.](#)

Previous Next

Almost

95%

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

90%

of Walden DBA alumni responding to our survey state that their Walden degree enhanced their professional performance

More than

90%

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

Source: [www.WaldenU.edu/survey\\_methodology](http://www.WaldenU.edu/survey_methodology); % calculated on total number of respondents to our 2014 survey.

“Earning my DBA, with a greater focus on practical application, made the transfer of knowledge between school and work seamless.”

Dayner Azzellino  
Doctor of Business Administration (DBA) 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.

Tuition Savings  
Available

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Speak with an enrollment advisor today.



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Get the answers to your questions.



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Apply now and get started on your educational journey.

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[Choosing the DBA Specialization That's Right for You](#)

[What Are the Top Five Benefits of Going to College Online?](#)





# EXHIBIT 14

## THE JOURNEY

### Milestone - 1

#### Complete Your Course Work

8005 - Foundation -----> *(Plan for Residency 1)*

8110 - Business Ops

-----> *(Go to Residency 1) (Interview Potential Mentors)*

8120 - Information Systems

8130 - Marketing

8140 - Finance

8150 - Leadership

8160 - Business Strategy

8427 - Applied Research (Focus, this class is very important to your success)

-----> *(Plan for Residency 2) (Choose a Mentor)*

8990 - Writing Prospectus (Develop your topic of 12 words or less, have a draft at class end)

-----> *(During Week 2, Submit a Chair Request Form for your Mentor)*

-----> *(By week 6, follow-up for the official assignment, Week 7 & 8)*

-----> **GET TO KNOW YOUR NEW COMMITTEE CHAIR**

-----**GET THAT CONFIRMATION FROM PROGRAM DIRECTOR**-----

8437 - Quantitative Methods (Statistics and a challenging course Pay Attention)

---**8100 Section 1 - Get an Approved Topic / Find (25) References related to Topic**

0000 - Specialization 1

---**8100 Section 2 - Write / Develop your Prospectus--Find (25) References related to Topic**

0000 - Specialization 2

---**8100 Section 3 - Write/Develop your Prospectus--Find (25) References related to Topic**

0000 - Specialization 3 -----> *(Go to Residency 2)*

---**8100 Section 4 - Get an Approved Prospectus--Find (25) References related to Topic**

-----**Reminder 20 of the 25 References you find must be current within 5yrs for each section**-----

-----**REQUEST AND CONFIRM 2nd COMMITTEE MEMBER & URR MEMBER**-----

-----**CONGRATS ON ACHIEVING MILESTONE 1----CELEBRATE**-----

## **Milestone - 2**

### **Welcome to DDBA 9000 and the Proposal Phase**

#### **9000 Section 1 - Write and Develop Section 1 (8 weeks)**

1. Find **(5)** current References Closely Related to your Study
2. Get Section **(1)** Draft completed entirely **(Remember it does not have to be Perfect)**
3. Schedule an Appointment with the Writing Center
4. Complete and Submit Section **(1)** to Turnitin.com **(20%)** on the Originality Report
5. Submit to Walden's Writing Center for Review **(Wait 48hrs for results)**
6. Get results from Writing Center and make corrections **(Keep the Walden Review)**
7. Create and Develop a Correction Matrix from the Writing Center's Review and include the Writing Center's corrections of Section **(1)** in the Matrix
8. Submit Section **(1)** Draft, Turnitin Originality Report, and Correction Matrix to Chair

-----**Revise, Revise, Revise**-----

#### **9000 Section 2 - Write and Develop Section 2 (8 weeks)**

1. Ensure you have an Approved Section **(1)** by your Chair
2. Find **(5)** current References Closely Related to your Topic
3. Get Section **(2)** Draft completed entirely **(Remember it does not have to be Perfect)**
4. Schedule an Appointment with the Writing Center
5. Complete and Submit Section **(2)** to Turnitin.com **(20%)** on the Originality Report
6. Submit to Walden's Writing Center for Review **(Wait 48hrs for results)**
7. Get results from Writing Center and make corrections **(Keep the Walden Review)**
8. Expand the Correction Matrix from Section **(1)** to include Review from Walden's Writing Center of Section **(2)** and Committee's Corrections from Section **(1)**
9. Submit Section **(2)** Draft, Turnitin Originality Report, and the expanded Correction Matrix to your Chair

-----**Revise, Revise, Revise**-----

#### **9000 Section 3 - Complete and Revise Sections 1 & 2 (Doctoral Study Proposal) (8 weeks)**

1. Ensure you have an approved Section **(2)** by your Chair
2. Contact and Hire a Methodologist and a Professional Editor (Seek Chair's Advice)
3. **Submit Section's (1) & (2) to include your Abstract, Turnitin Originality Reports for Section's (1) & (2), the Expanded Correction Matrix to include all Writing Center corrections and all Committee corrections combined into one document to your Chair for final approval.**
4. Upon approval from your chair to proceed, submit sections **(1) & (2)** to your hired Professional Editor for edit.
5. Chair submits edited sections **(1) & (2) of Proposal to URR member! (Wait 14 days)**
6. Begin preparations for Oral Defense and work on IRB application!

-----**Wait, Wait, Wait**-----

**9000 Section 4 - Completion & Approval of the Proposal (8 weeks)**

- 1. Ensure you have URR Approval! Celebrate**
- 2. Prepare your 15 to 20 slide powerpoint presentation for the Oral Defense (Proposal)**
- 3. Request an Oral Defense date from Chair! (7 days Approximately)**
- 4. Successfully complete your oral defense of the Proposal! Celebrate**
- 5. Submit your IRB Application to Chair for review and sign off!**
- 6. Chair submits IRB Application for approval! (this process could take 4-6 weeks)**
- 7. Get IRB Approval! Celebrate! (Ensure you get an Official IRB approval Letter)**
- 8. Proceed to work on Section (3) of the Doctoral Study!**

-----**CONGRATS ON COMPLETING MILESTONE 2**-----**CELEBRATE**-----

**Milestone - 3**

**Welcome to the Doctoral Study Completion Phase**

**9000 Section 5 - The Doctoral Study Completion Phase and Graduation (8 weeks)**

- 1. Ensure you have an approved Proposal and Official IRB clearance**
- 2. Complete Section (3) Draft, the data analysis and results of your study**
- 3. Schedule an appointment with the Writing Center at Walden**
- 4. Submit your Section (3) draft to the Walden Writing center for review (Wait 48hrs)**
- 5. Get results from Writing Center and make corrections (Keep the Walden Review)**
- 6. Submit Section (3) to Turnitin.com (20%) on the Originality Report**
- 7. Expand your Correction Matrix from Section (1 & 2) to include Review from Walden's Writing Center of Section (3)**
- 8. Submit Section 3, Correction Matrix, and Turnitin Report to your Chair for review**
- 9. Upon approval submit to Professional editor for editing**
- 10. Submit Edited Doctoral Study to Chair for approval...Chair will submit to URR for review! (Wait 14 days)**
- 11. Prepare for Oral Defense of Doctoral Study**
- 12. Prepare a 15 to 20 slide power point presentation for Oral Defense of Doc Study**
- 13. Get URR approval of Doctoral Study**
- 14. Successfully defend your Doctoral Study! Celebrate!**
- 15. Submit Doc Study via Chair to University for Form & Style review! (14 days)**
- 16. Finalize and review your Abstract with your Chair for submission to CAO (14 days)**
- 17. Abstract Approved by CAO.....Congrats.....Dr. You!**
- 18. Complete your Graduation Application and UMI ProQuest form etc.....**





# EXHIBIT 15



## Ph.D. in Psychology

Email Print Share

Walden's Ph.D. in Psychology is one of the only course-based distance-learning programs of its kind.

It follows a scholar-practitioner model that encourages you to integrate scholarly research with your practical expertise. Taught by respected researchers and practitioners, this doctorate in psychology program will prepare you to make a difference in a variety of settings.

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| CURRICULUM                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | TUITION AND FEES | CAREER OPTIONS | HIGHLIGHTS | LEARNING OUTCOMES | PROGRAM DATA | LEARN MORE |                  |                  |                     |         |                                                |         |                                         |         |                          |         |                                    |         |      |            |                         |       |         |      |                  |                  |                    |               |                |                |      |        |                        |          |                           |     |                              |                |
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| <p>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 Psychology 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.</p> <p><a href="#">Occupations</a><br/><a href="#">Program Completion Rate</a><br/><a href="#">Program Costs</a><br/><a href="#">Median Loan Debt</a></p> <p><b>Occupations</b>—This program generally prepares students to enter the types of occupations listed below. For more information on these specific occupations, visit <a href="http://www.onetonline.org">www.onetonline.org</a>.</p> <p>In addition to this list, there are other <a href="#">career options</a> 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.</p> <p>View examples of our <a href="#">student</a> and <a href="#">alumni</a> accomplishments in their chosen fields.</p> <table><thead><tr><th>Occupation Name*</th><th>Occupation Code*</th></tr></thead><tbody><tr><td>Managers, All Other</td><td>11-9199</td></tr><tr><td>Clinical, Counseling, and School Psychologists</td><td>19-3031</td></tr><tr><td>Industrial-Organizational Psychologists</td><td>19-3032</td></tr><tr><td>Psychologists, All Other</td><td>19-3039</td></tr><tr><td>Psychology Teachers, Postsecondary</td><td>25-1066</td></tr></tbody></table> <p><i>*The "occupation name" is a general job title. "Occupation code" refers to the U.S. Bureau of Labor Statistics' Standard Occupation Classification.</i></p> <p><b>Program Completion</b>—The program completion rate is the percentage of students who graduated between July 1, 2010, and June 30, 2011, who completed this program in the normal completion time.</p> <p>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.</p> <table><thead><tr><th>Rate</th><th>Percentage</th></tr></thead><tbody><tr><td>On-time completion rate</td><td>58.3%</td></tr></tbody></table> <p><b>Program Costs</b>—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.</p> <table><thead><tr><th>Expense</th><th>Cost</th></tr></thead><tbody><tr><td>Tuition and Fees</td><td>\$73,040-102,270</td></tr><tr><td>Books and Supplies</td><td>\$3,600-5,500</td></tr><tr><td>Room and Board</td><td>Not applicable</td></tr></tbody></table> <p>View cost per credit in the <a href="#">Tuition and Fees</a> section.</p> <p><b>Median Loan Debt</b>—The following is the median amount borrowed by all students who completed the program between July 1, 2010, and June 30, 2011. The amount borrowed may include tuition as well as non-institutional costs such as estimated living expenses.</p> <table><thead><tr><th>Loan</th><th>Amount</th></tr></thead><tbody><tr><td>Title IV Program Loans</td><td>\$71,634</td></tr><tr><td>Private Educational Loans</td><td>\$0</td></tr><tr><td>Institutional Financing Plan</td><td>Not applicable</td></tr></tbody></table> |                  |                |            |                   |              |            | Occupation Name* | Occupation Code* | Managers, All Other | 11-9199 | Clinical, Counseling, and School Psychologists | 19-3031 | Industrial-Organizational Psychologists | 19-3032 | Psychologists, All Other | 19-3039 | Psychology Teachers, Postsecondary | 25-1066 | Rate | Percentage | On-time completion rate | 58.3% | Expense | Cost | Tuition and Fees | \$73,040-102,270 | Books and Supplies | \$3,600-5,500 | Room and Board | Not applicable | Loan | Amount | Title IV Program Loans | \$71,634 | Private Educational Loans | \$0 | Institutional Financing Plan | Not applicable |
| Occupation Name*                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Occupation Code* |                |            |                   |              |            |                  |                  |                     |         |                                                |         |                                         |         |                          |         |                                    |         |      |            |                         |       |         |      |                  |                  |                    |               |                |                |      |        |                        |          |                           |     |                              |                |
| Managers, All Other                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | 11-9199          |                |            |                   |              |            |                  |                  |                     |         |                                                |         |                                         |         |                          |         |                                    |         |      |            |                         |       |         |      |                  |                  |                    |               |                |                |      |        |                        |          |                           |     |                              |                |
| Clinical, Counseling, and School Psychologists                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | 19-3031          |                |            |                   |              |            |                  |                  |                     |         |                                                |         |                                         |         |                          |         |                                    |         |      |            |                         |       |         |      |                  |                  |                    |               |                |                |      |        |                        |          |                           |     |                              |                |
| Industrial-Organizational Psychologists                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | 19-3032          |                |            |                   |              |            |                  |                  |                     |         |                                                |         |                                         |         |                          |         |                                    |         |      |            |                         |       |         |      |                  |                  |                    |               |                |                |      |        |                        |          |                           |     |                              |                |
| Psychologists, All Other                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | 19-3039          |                |            |                   |              |            |                  |                  |                     |         |                                                |         |                                         |         |                          |         |                                    |         |      |            |                         |       |         |      |                  |                  |                    |               |                |                |      |        |                        |          |                           |     |                              |                |
| Psychology Teachers, Postsecondary                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | 25-1066          |                |            |                   |              |            |                  |                  |                     |         |                                                |         |                                         |         |                          |         |                                    |         |      |            |                         |       |         |      |                  |                  |                    |               |                |                |      |        |                        |          |                           |     |                              |                |
| Rate                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Percentage       |                |            |                   |              |            |                  |                  |                     |         |                                                |         |                                         |         |                          |         |                                    |         |      |            |                         |       |         |      |                  |                  |                    |               |                |                |      |        |                        |          |                           |     |                              |                |
| On-time completion rate                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | 58.3%            |                |            |                   |              |            |                  |                  |                     |         |                                                |         |                                         |         |                          |         |                                    |         |      |            |                         |       |         |      |                  |                  |                    |               |                |                |      |        |                        |          |                           |     |                              |                |
| Expense                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Cost             |                |            |                   |              |            |                  |                  |                     |         |                                                |         |                                         |         |                          |         |                                    |         |      |            |                         |       |         |      |                  |                  |                    |               |                |                |      |        |                        |          |                           |     |                              |                |
| Tuition and Fees                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | \$73,040-102,270 |                |            |                   |              |            |                  |                  |                     |         |                                                |         |                                         |         |                          |         |                                    |         |      |            |                         |       |         |      |                  |                  |                    |               |                |                |      |        |                        |          |                           |     |                              |                |
| Books and Supplies                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | \$3,600-5,500    |                |            |                   |              |            |                  |                  |                     |         |                                                |         |                                         |         |                          |         |                                    |         |      |            |                         |       |         |      |                  |                  |                    |               |                |                |      |        |                        |          |                           |     |                              |                |
| Room and Board                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Not applicable   |                |            |                   |              |            |                  |                  |                     |         |                                                |         |                                         |         |                          |         |                                    |         |      |            |                         |       |         |      |                  |                  |                    |               |                |                |      |        |                        |          |                           |     |                              |                |
| Loan                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Amount           |                |            |                   |              |            |                  |                  |                     |         |                                                |         |                                         |         |                          |         |                                    |         |      |            |                         |       |         |      |                  |                  |                    |               |                |                |      |        |                        |          |                           |     |                              |                |
| Title IV Program Loans                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | \$71,634         |                |            |                   |              |            |                  |                  |                     |         |                                                |         |                                         |         |                          |         |                                    |         |      |            |                         |       |         |      |                  |                  |                    |               |                |                |      |        |                        |          |                           |     |                              |                |
| Private Educational Loans                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | \$0              |                |            |                   |              |            |                  |                  |                     |         |                                                |         |                                         |         |                          |         |                                    |         |      |            |                         |       |         |      |                  |                  |                    |               |                |                |      |        |                        |          |                           |     |                              |                |
| Institutional Financing Plan                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Not applicable   |                |            |                   |              |            |                  |                  |                     |         |                                                |         |                                         |         |                          |         |                                    |         |      |            |                         |       |         |      |                  |                  |                    |               |                |                |      |        |                        |          |                           |     |                              |                |



# EXHIBIT 16



## Ph.D. in Psychology

In Walden's Ph.D. in Psychology program, you can explore current theories, research, and best practices to build the skills and knowledge required to work with a diverse clientele in a variety of settings.

This program—based on a scholar-practitioner model—encourages you to integrate scholarly research with practical expertise.

Taught by respected researchers and experts in the field, the program offers eight specializations that allow you to focus on a specific area of psychology. Select the Clinical Psychology or Counseling Psychology specialization if you want to prepare for licensure and independent psychological practice.\*

\*The Clinical Psychology and Counseling Psychology specializations in the Ph.D. in Psychology program are designed to prepare graduates to qualify to sit for psychology licensing exams. These specializations are designed to meet the academic licensure requirements of some state psychology boards. However, Walden University's professional specializations in Clinical Psychology and Counseling Psychology are not accredited by the American Psychological Association (APA) and have not received designation by the Association of State and Provincial Psychology Boards/National Register (ASPPB/NR), which are requirements for licensure in some states. Walden enrollment advisors can provide guidance on licensure issues, state-by-state educational requirements, and internship and practicum requirements; however, it remains the student's responsibility to evaluate and understand the licensure requirements for the state or international location in which he or she intends to work as requirements vary widely. Walden University makes no representation or guarantee that the completion of a degree or coursework for graduate credit will permit the student to obtain licensure.

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### Speak with Our Faculty

Talk directly to School of Psychology faculty about what it's like to earn your degree at Walden.

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PREV NEXT

CURRICULUM

TUITION AND FEES

CAREER OPTIONS

HIGHLIGHTS

LEARNING OUTCOMES

PROGRAM DATA

LEARN MORE

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 Psychology 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](http://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* |
|------------------------------------------------|------------------|
| Managers, All Other                            | 11-9199          |
| Psychologists                                  | 19-3030          |
| Clinical, Counseling, and School Psychologists | 19-3031          |
| Industrial-Organizational Psychologists        | 19-3032          |
| Psychologists, All Other                       | 19-3039          |
| Postsecondary Teachers                         | 25-1000          |
| Psychology Teachers, Postsecondary             | 25-1066          |

\*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 | 49.3-72.9% |

**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   | \$71,510-100,655 |
| Books and Supplies | \$3,816-5,830    |
| 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    |
|------------------------------|-----------|
| Title IV Program Loans       | \$105,830 |
| Private Educational Loans    | \$0       |
| Institutional Financing Plan | \$0       |



# EXHIBIT 17

**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.

**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.

**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.

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

# EXHIBIT 18





**WALDEN UNIVERSITY**

2 0 0 5 V I E W B O O K



## HOW MUCH TIME WILL IT TAKE ME?

### Bachelor's Completion Programs

B.S. programs can be completed in as little as 15–27 months. Students generally take one course per six-week term. There are two terms per quarter, which means most students will complete two courses per quarter for a total of eight courses per year.

You can expect to spend approximately 15–20 hours per week participating in online discussions and completing required readings and individual and group assignments. Participation requirements are determined by the instructor, who may ask for postings to the discussion board two to five days per week to meet program requirements.

### Master's Programs

Master's programs can be completed in as little as 15–24 months.

Master's programs are offered in either a semester or quarter academic calendar. Programs offered on a quarterly basis may include 12-week courses or two contiguous six-week courses. Programs offered on a semester basis include two eight-week courses offered consecutively in a prescribed sequence.

You can expect to spend approximately 15–20 hours per week in Walden's course-based programs. This includes time spent participating in weekly discussions and completing required readings and individual and group assignments, as well as a final course project, research paper, or portfolio.

### Doctoral Programs

Most Ph.D. students earn their degree in 4.5 years or less. The Ed.D. program takes three years to complete.

You can expect to spend approximately 15–20 hours per week in any doctoral program to maintain steady progress toward this completion time. Some activities, such as residencies, allow you to focus on your program for a more extended time within a given period, ranging from weekend sessions to two-week summer and winter sessions.

### Non-Degree-Seeking Students

Non-degree-seeking students may enroll in courses on a space-available basis. For a *Non-Degree-Seeking Enrollment* form, call toll-free 866-4WALDEN (866-492-5336) or 410-843-6705 for international inquiries.

Enrollment as a non-degree-seeking student does not guarantee admission to any academic program at Walden. However, it gives you a chance to sample the Walden experience and gain valuable knowledge. No more than eight to 10 quarter credits earned while in non-degree-seeking status may be transferred and applied to a Walden program.

The 2000 National Doctoral Program Survey rated all of Walden's doctoral programs in the first quartile of programs nationally. The survey, conducted on the Web by The National Association of Graduate-Professional Students, assessed best practices in graduate education and student satisfaction, teaching preparation, professional development, career guidance, time to degree, program climate, and overall satisfaction. For more information, visit [www.nagps.org](http://www.nagps.org).

#### 1986

KAM (Knowledge Area Module) curriculum is introduced, in which students demonstrate competency by completing an individualized program of study within a curriculum developed by the Walden faculty.

#### 1990

Walden gains accreditation from the North Central Association of Colleges and Schools.

## Completion Requirements

- 121 quarter credit hours, excluding practicums (PUBH 8004, PUBH 8005), where required
- Professional Development Plan and Program of Study
- Minimum 10 quarters enrollment
- SBSF 8417 and public health courses (91 cr., including course credits transferred from a public health or related graduate degree)
- Research proposal, dissertation, and oral presentation (30 cr.)
- 32 residency units
- **Time to Completion: Most Ph.D. students earn their degree in 4.5 years or less**

### CURRICULUM FOR STUDENTS WITHOUT A PUBLIC HEALTH-RELATED GRADUATE DEGREE (TRACK I)

Students who enter the program with a bachelor's degree or without a graduate degree in public health or a closely aligned public health discipline complete a sequence of 6000-level public health courses designed to provide them with foundational knowledge in the areas of biostatistics, epidemiology, environmental health sciences, health services administration, and the social and behavioral sciences. Following completion of the 6000-level foundation courses listed below, students complete the core and specialization courses in public health at the 8000 level.

#### FOUNDATION CURRICULUM

- PUBH 6100 Introduction to Public Health (4 cr.)
- PUBH 6105 Social and Behavioral Dimensions of Health (4 cr.)
- PUBH 6110 Principles of Biostatistics (4 cr.)
- PUBH 6120 Principles of Epidemiology (4 cr.)
- PUBH 6130 Health Care Organization, Policy, and Administration (4 cr.)
- PUBH 6140 Fundamentals of Environmental Health and Risk Assessment (4 cr.)
- PUBH 6420 Principles of Community Health (4 cr.)
- PUBH 6430 Social and Behavioral Research Methods (4 cr.)
- PUBH 6440 Public Health Ethics (4 cr.)

Students who complete the required public health foundation (6000-level) and core (8000-level) courses will be awarded the Master of Science in Public Health degree.

### CURRICULUM FOR STUDENTS WITH A PUBLIC HEALTH-RELATED GRADUATE DEGREE (TRACK II)

Students who enter the program with a graduate degree in public health or a closely aligned public health discipline complete the following 8000-level core courses followed by the specialization courses.

#### CORE CURRICULUM

- PUBH 8000 Foundations for Doctoral Study in Public Health (1 cr.)
- PUBH 8004 Field Practicum in Public Health, Part I\* (5 cr.)
- PUBH 8005 Field Practicum in Public Health, Part II\* (5 cr.)
- PUBH 8010 Promoting Population Health (5 cr.)
- PUBH 8015 Administration and Leadership of Public Health Programs (5 cr.)
- PUBH 8020 Public Health Informatics (5 cr.)
- PUBH 8427 Research Seminar II: Design in Public Health Research (5 cr.)
- SBSF 8417 Research Seminar I: Human Inquiry and Science (4 cr.)

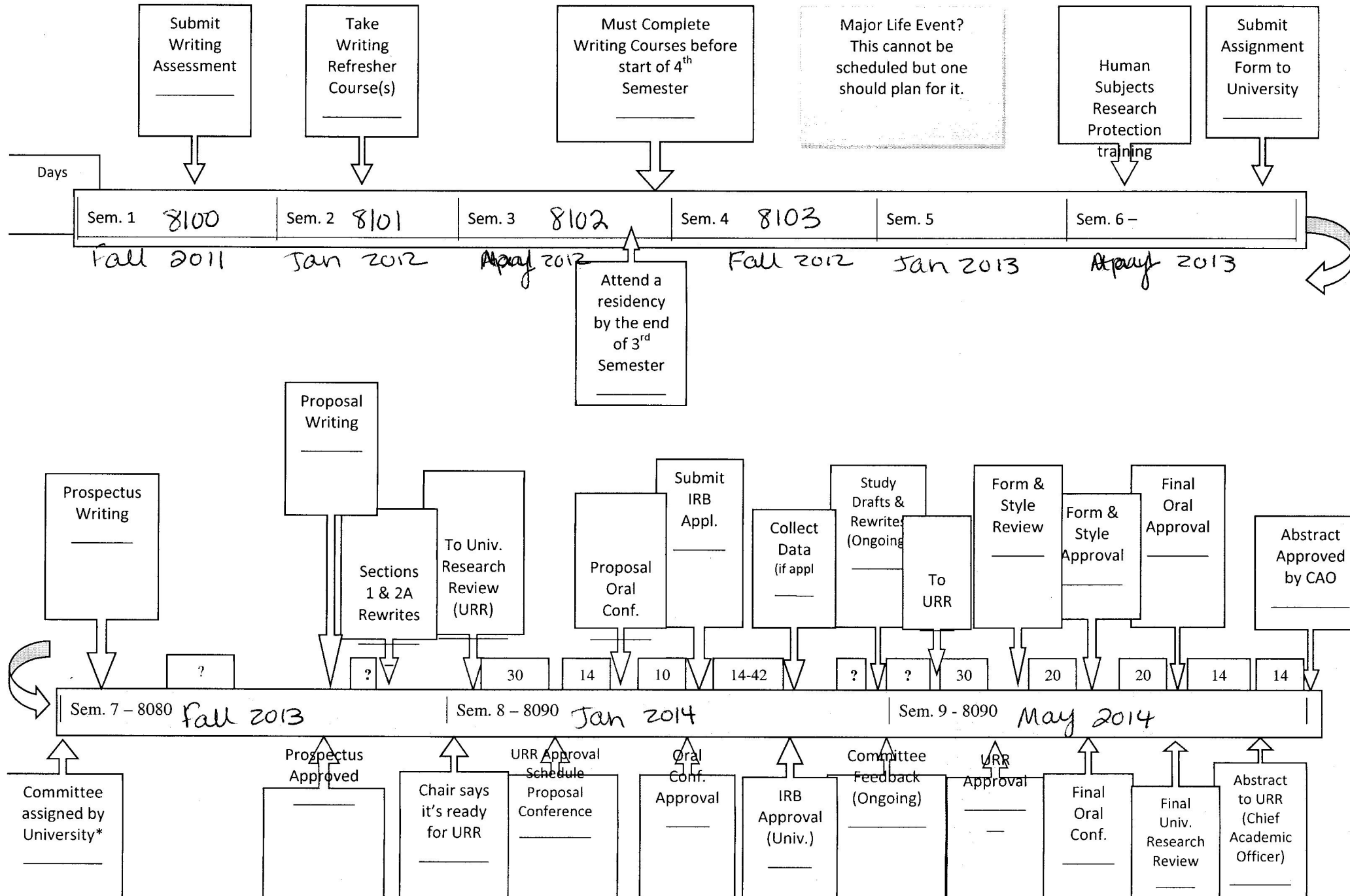
\* Required for students who do not have at least three years of public health professional experience.

# EXHIBIT 19

This version is for students who began May 3, 2010

Instructions: Insert your target date on the blank in each box using the suggested number of days in the boxes that rest on the green line.

\* = change is under consideration





# EXHIBIT 20



Doctor of Education (Ed.D.)

Walden’s Doctor of Education (Ed.D.) program is designed to improve your scholarship and research skills so you can improve student learning at the classroom and school level.

Our Ed.D. degree program has a learning format that combines online courses and face-to-face **residencies**. This allows you to collaborate with education leaders around the world without compromising your personal and professional commitments. When you earn your Doctor of Education online at Walden, you benefit from a relevant program designed to help you advance your research and make a difference in your field.

Find information about Walden programs and **licensure requirements** specific to your state.

Walden University is approved by Minnesota to offer the Ed.S. in Educational Leadership and Administration program that leads to licensure as a preK-12 principal in Minnesota. This is the only program offered by Walden that is state approved as leading to any preK-12 administrative/leadership license (e.g., assistant principal, principal, teacher leader, superintendent).

Prospective candidates from outside of Minnesota should review their own state’s requirements to ensure that completing a teacher or principal preparation program at Walden will meet eligibility requirements for similar licensure in their state.

Walden University makes no representation or guarantee that successful completion of Walden’s programs, or coursework for graduate credit within any graduate program, will permit a graduate to obtain state licensure or endorsement as a preK-12 teacher or administrator.

Like 0

Tweet

G+10

CURRICULUM

TUITION AND FEES

HIGHLIGHTS

LEARNING OUTCOMES

PROGRAM DATA

LEARN MORE

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 Doctor of Education (Ed.D.) 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* |
|---------------------------------------------------------------------------|------------------|
| Secondary School Teachers                                                 | 25-2030          |
| Education, Training, and Library Workers, All Other                       | 25-9099          |
| Adult Basic and Secondary Education and Literacy Teachers and Instructors | 25-3011          |
| Education Teachers, Postsecondary                                         | 25-1081          |
| Vocational Education Teachers, Postsecondary                              | 25-1194          |
| Education Administrators, Postsecondary                                   | 11-9033          |
| Education Administrators, All Other                                       | 11-9039          |
| Education Administrators, Elementary and Secondary School                 | 11-9032          |
| Instructional Coordinators                                                | 25-9031          |
| Preschool and Kindergarten Teachers                                       | 20-2010          |
| Elementary and Middle School Teachers                                     | 25-2020          |
| Education Administrators, Preschool and Childcare Center/Program          | 11-9031          |

*\*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, 2010, and June 30, 2011, 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 | 59.2%      |

**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   | \$57,945-62,565 |
| Books and Supplies | \$0             |
| 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, 2010, and June 30, 2011. The amount borrowed may include tuition as well as non-institutional costs such as estimated living expenses.

| Loan                         | Amount         |
|------------------------------|----------------|
| Title IV Program Loans       | \$59,836       |
| Private Educational Loans    | \$0            |
| Institutional Financing Plan | Not applicable |



Sign Up for a Free Information Packet

The Completion Agenda

Learn more about the Completion Agenda from Dr. Terry O'Banion. [Listen to his informative interview](#) with Higher Ed Talk Radio or [watch a free on-demand webinar](#).





# EXHIBIT 21

*Important Note Regarding Books and Supplies (Posted 6/22/2016): Walden University recently restructured its processes and the cost of books is no longer included in the cost of tuition as noted on the page created on 4/15/2016 below. This program disclosure page is only updated once annually. Please be advised that there will be additional costs for the price of books for this program.*

[Go back to Walden's Doctor of Education \(EdD\) program](#)

## Walden University

### Doctor of Education

Program Level - Doctoral degree

Program Length - 52 months



#### COST

**Q.** How much will this program cost me?\*

**A.** Tuition and fees: \$59,731  
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 52 months to complete. Of those that completed the program in 2014-2015, 23% finished in 52 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: \$91,189  
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.

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



# EXHIBIT 22



## Tuition and Fees

Request Information

### Explore our Doctor of Education from Walden

OVERVIEW  
TUITION AND FEES  
FACULTY  
HIGHLIGHTS  
CAREER OPTIONS  
LEARNING OUTCOMES

#### Doctor of Education

| Curriculum Component | Requirements                  | Cost                                                       | Total*   |
|----------------------|-------------------------------|------------------------------------------------------------|----------|
| Tuition              | 76 total quarter credit hours | \$590 per quarter hour                                     | \$44,840 |
| Residency Fee        | One residency                 | \$925 (travel, lodging, and other expenses are additional) | \$925    |
| Technology Fee       | Per quarter                   | \$125                                                      | \$1,750  |
|                      |                               | Total                                                      | \$47,515 |
|                      |                               | Transfer up to 38 credits                                  | \$22,670 |
|                      |                               | Total with Maximum Transfer Credits†                       | \$24,845 |

\*The tuition reflects the minimum time to completion. 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 more.](#)

#### Financial Aid

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

#### Currency Conversion

Google and Yahoo offer easy-to-use online currency converters.

Request Information

Live outside the U.S.?

What is your program of interest? \*

First Name \*Last Name \*

Email \*Phone \* (Numbers only)

State \*ZIP / Postal Code \*

U.S. / Canadian postal codes only.

Submit

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.

### Curriculum

Nine EdD program specializations offer coursework designed to prepare scholar-practitioners in academic roles that call for strong evidence-based decision-making and leadership skills. Choose the specialization that matches your career goals:

- Community College Leadership
  - Curriculum, Instruction, and Assessment
  - Early Childhood Education (Non-Licensure)
  - Educational Administration and Leadership (Non-Licensure)
  - Educational Technology
- Higher Education and Adult Learning
  - Higher Education Leadership and Management
  - Reading, Literacy, and Assessment (Non-Licensure)
  - Special Education (Non-Licensure)

Walden offers both state-approved educator licensure programs as well as programs and courses that do not lead to licensure or endorsements. Prospective students must review their state licensure requirements prior to enrolling. For more information, please refer to [www.WaldenU.edu/educlicensure](#).

Prospective Alabama students: Contact the Teacher Education and Certification Division of the Alabama State Department of Education at 1-334-242-9935 or [www.alsde.edu](#) to verify that these programs qualify for teacher certification, endorsement, and/or salary benefits.

Prospective Washington state students are advised to contact the Office of the Superintendent of Public Instruction at 1-360-725-6275 or [prof.educ@k12.wa.us](#) to determine whether Walden's programs in the field of education are approved for teacher certification or endorsements in Washington state. Additionally, teachers are advised to contact their individual school district as to whether this program may qualify for salary advancement.

### Scholar of Change



Hear how Benjamin Isaac, EdD student, is inspiring children with special needs.

[Watch his story.](#)

Almost  
95%

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

Source: [www.WaldenU.edu/survey\\_methodology](#); % calculated on total number of respondents to our 2014 survey.

“Walden University is a community of educators who are striving to make the world a better place by bringing social justice and social change to their communities. I'm proud to be a member of that community and to add my own contributions.”

Jill Takacs  
Doctor of Education (EdD) Graduate

“The most rewarding aspect of pursuing my degree at Walden was the relationships and network that I formed.”

Angela Valdez  
Doctor of Education (EdD) Graduate

Put Your Degree Within Reach.

Tuition Savings Available

LEARN MORE

Call Us Now  
Speak with an enrollment advisor today.

Chat Live  
Get the answers to your questions.

Ready to Enroll?  
Apply now and get started on your educational journey.

#### Related Articles

Supporting Your Child in a Virtual School Program

How to Tell If I Want an EdD or a PhD in Education?

Doctor of Education - Careers In and Out of the Classroom

Does Your EdD Program Hit the Mark?

The Benefits of an EdD



# EXHIBIT 23

# WALDEN UNIVERSITY

June 20, 2014

**Via Overnight Mail and Email: Betsy.Talbot@state.mn.us**

Ms. Betsy Talbot  
 Student Consumer Advocate  
 Institutional Registration & Licensing  
 Minnesota Office of Higher Education  
 1450 Energy Park Drive, Suite 350  
 St. Paul, MN 55108-5227

Re: Tony Tyler Follow-up

Dear Ms. Talbot:

As you have requested, we are providing you with copies of the following documents:

1. NSLDS profile and financial counseling history
  - a. Communications between Financial Aid Department and Mr. Tyler;
  - b. Copy of Mr. Tyler's National Student Loan Data System Record; and,
  - c. Copy of Mr. Tyler's student account record.

2. Rate of Graduation for Tony Tyler's Program:

Number of Months to Complete the Ed.D. Higher Education and Adult Learning (HEAL) Program:  
 Graduates since 2009

| Months       | # of Grads | % of Grads  |
|--------------|------------|-------------|
| 35           | 2          | 2%          |
| 39           | 5          | 4%          |
| 41           | 1          | 1%          |
| 43           | 18         | 16%         |
| 45           | 3          | 3%          |
| 47           | 18         | 16%         |
| 49           | 8          | 7%          |
| 51           | 19         | 16%         |
| 53           | 6          | 5%          |
| 55           | 13         | 11%         |
| 57           | 3          | 3%          |
| 59           | 16         | 14%         |
| 63           | 2          | 2%          |
| 65           | 2          | 2%          |
| <b>TOTAL</b> | <b>116</b> | <b>100%</b> |

**Average # of Months**

50 months (or roughly 4 years)

# WALDEN UNIVERSITY

Number of Semesters (doc study companion courses) to Complete Doctoral Study: EdD HEAL Program  
Graduates since 2009

| Semesters    | # of Grads | % of Grads  |
|--------------|------------|-------------|
| 2            | 1          | 1%          |
| 3            | 6          | 5%          |
| 4            | 23         | 20%         |
| 5            | 30         | 26%         |
| 6            | 23         | 20%         |
| 7            | 17         | 15%         |
| 8            | 14         | 12%         |
| 9            | 2          | 2%          |
| <b>TOTAL</b> | <b>116</b> | <b>100%</b> |

**Average # of Terms**

5.5 semesters

Students are not required to take Literature Review courses or obtain writing assistance. These are often recommended by faculty, but not required.

### 3. Mr. Tyler's academic transcript

Walden University administrators disagree with Mr. Tyler's assertion that he has been delayed due to differing opinions on the quality of his doctoral study work. A review of e-mails exchanged with Mr. Tyler and his committee members, along with notes in his doctoral study drafts seem to suggest that Mr. Tyler failed to follow the direction of his previous and current chair and committee members. He has been asked, on numerous occasions, to make revisions, which he failed to incorporate, resulting in him not being able to progress. Further, his previous and current chair and committee members have recommended that he receive assistance with his writing at the Writing Center, but he has not done so.

Dr. David Bail, a full-time University Research Reviewer (URR) from the Research and Residencies Center, also reviewed Mr. Tyler's proposal and believes it has merit; however, he agrees with the committee's recommendations presented to Mr. Tyler. After four reviews and consistent messaging to Mr. Tyler about the quality of his writing, it is unclear how he concluded there were differing opinions on the quality of his work. As indicated, the previous and current chair, the URR, and the second committee member all agree, and have consistently communicated, that Mr. Tyler needs assistance with his writing, and that he incorporate the committee's revisions to his proposal. The committee has also made several attempts to help Mr. Tyler understand that doctoral study work is an iterative process, and taking advantage of the free writing assistance, for doctoral level writing, will only help him succeed.

After review of his proposal, the Associate Dean for the Richard W. Riley College of Education and Leadership Administration and Postsecondary Education Division, Dr. Kelley Costner, indicated that she believes Mr. Tyler can finish his doctoral study if he is willing to complete the writing course and incorporate the revisions requested by his committee. She agrees with the URR that Mr. Tyler's

# WALDEN UNIVERSITY

proposal has merit and can contribute to the body of literature surrounding his topic, if he follows the committee's direction.

Dr. Costner has indicated that Walden can request, if needed, another doctoral chair to conduct a blind review of Mr. Tyler's work. We can also develop an individual academic plan for Mr. Tyler with a two-year goal of graduation. The first step, however, would be to have him agree to work with the Writing Center and to follow the direction of his Committee. Dr. Costner is more than willing to speak one-on-one with Mr. Tyler, to offer support and encouragement, given she has expertise in the achievement gap, which is the focus of Mr. Tyler's doctoral study.

At your request, all collection activity on Mr. Tyler's accounts has been temporarily suspended pending the resolution of this matter.

Any academic plan developed for Mr. Tyler's benefit will focus on the remaining requirements for having his doctoral study approved. To include a financial component of his plan that addresses his outstanding balance and future course costs will require the involvement of other departments. The academic team does not routinely address the financial needs of a student and recommends that these two concerns remain separate. The academic plan developed for the student will require his signature, along with that of his committee chair, program director, director, and the associate dean. Once it is prepared, discussed, and fully executed, a copy is placed in the student's file.

We hope that this letter is responsive to your concerns. If you should have questions, however, please do not hesitate to contact me.

Sincerely,



John A. Sabatini, Jr.  
Divisional Vice President  
Institutional Quality and Integrity  
Laureate Global Products & Services

Enclosures

# EXHIBIT 24

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

## PhD in Health Services

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.

### 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.

### 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.

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



# EXHIBIT 25

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

## PhD 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.

### 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.

### 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.

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

# EXHIBIT 26

**Walden University**

**PhD in Public Policy and Administration**

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 27

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

## PhD in Public Health

Program Level - Doctoral degree

Program Length - 66 months

### COST

Q. How much will this program cost me?\*

- A. Tuition and fees: \$49,200  
 Books and supplies: \$3,258  
 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: \*

Private education loans: \*

Institutional financing plan: \*

\* Less than 10 graduates received loans. Median amounts are withheld to preserve the confidentiality of the loan recipients.

The school has elected to provide the following additional information: 88% 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 66 months to complete. Of those that completed the program in 2012-2013, 37% 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.

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

# EXHIBIT 28





## 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](http://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 29

**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

Private education loans: \$0

Institutional financing plan: \$0

The school has elected to provide the following additional information: 77% 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 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 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 30

# Walden University

## **2013–2014 Handbook**

**December 2013**

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**WALDEN UNIVERSITY**  
*A higher degree. A higher purpose.*

## **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](mailto: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](mailto: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

|                                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|----------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Form and Style Review</b>           | 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.                                                                                                                                                                                                                                                                         |
| <b>Complete Thesis Oral Conference</b> | <p>Following F&amp;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.</p> <p>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.</p>                                                                                         |
| <b>Final URR Review</b>                | <p>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 <a href="mailto:thesis@waldenu.edu">thesis@waldenu.edu</a>. At this time, the URR reviewer conducts a final review to make sure all methodological, content, and writing issues have been addressed.</p> <p><i>In addition, the URR reviewer reviews the abstract to make sure it meets university guidelines.</i></p> |
| <b>Chief Academic Officer Review</b>   | 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.

| <b><i>Quarter of Intended Graduation</i></b> | <b><i>Submission to Form and Style</i></b> | <b><i>Dissertation Oral Presentation</i></b> | <b><i>Final Dissertation and Rubric Submitted</i></b> | <b><i>Abstract Submitted for Chief Academic Officer Review</i></b> |
|----------------------------------------------|--------------------------------------------|----------------------------------------------|-------------------------------------------------------|--------------------------------------------------------------------|
| 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 31

Academic Policies  
Financial Services Policies  
Academic Resources  
Student Services

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# **Walden University Student Handbook**

## **2010–2011**

**WALDEN UNIVERSITY**

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[www.WaldenU.edu/catalog](http://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 32

# Walden University

## 2010–2011 Catalog

March 2011

**WALDEN UNIVERSITY**  
*A higher degree. A higher purpose.*

## Post-Master's Certificate Programs

### Post-Master's Teaching Online Certificate (20 cr.)

The Teaching Online post-master's certificate program provides students with hands-on training as they teach an online course. They study principles of instructional design, teaching strategies, best practices for teaching a diverse student body, and the online environment.

- PSYC 8760 - Educational Psychology
- PSYC 8762 - Teaching of Psychology
- PSYC 8763 - Principles of Instructional Design
- PSYC 8764 - Instructional Design for Online Course Development

## Doctoral Degree Programs

### Ph.D. in Psychology

The university's mission includes broad access to high-quality postsecondary education through a distance-learning environment and preparation of its graduates to achieve professional excellence and to effect positive social change. Consistent with this mission, the Ph.D. in Psychology program is designed to prepare scholar-practitioners to meet real-world challenges and facilitate positive change in individuals, groups, organizations, and local, national, and global communities.

Specifically, the program prepares lifelong learners to integrate psychological theory, research, established methods of scientific inquiry, and evidence-based practices that incorporate cultural and individual diversity. The School of Psychology training model encompasses an integrated, developmental, and sequential plan of study that includes web-based and face-to-face coursework; residencies that provide opportunities for knowledge and skill acquisition, ethical practice, and professional socialization; field training; and demonstration of research competency.

### Specializations

- Clinical Psychology
- Counseling Psychology
- General Psychology
  - Educational Psychology Track
  - Research and Evaluation Track
- Health Psychology
- Organizational Psychology

## **Degree Requirements**

- 121–174 total quarter credit hours, depending on the specialization
- Foundation course (6 cr.)
- Professional Development Plan with program of study and, for students in the Clinical Psychology and Counseling Psychology specializations, a Personal State Licensure Plan (included in PSYC 8000)
- Core courses (35–70 cr., depending on specialization)
- Specialization courses (20–50 cr., depending on specialization)
- Elective courses (5–20 cr., depending on specialization)
- Track courses (10 cr., Organizational Psychology specialization only)
- Proposal, dissertation, and oral presentation (30 cr.)
- Field experience—required for the Clinical Psychology and Counseling Psychology specializations (18 cr.)
- Residency:
  - Clinical Psychology and Counseling Psychology specializations: Milestone 1 residency and a 500-hour Academic Year in Residence
  - Other specializations: 16 units of academic residency (four 4-day residencies)

## **Curriculum**

The curriculum for each specialization of the Ph.D. in Psychology is composed of core and elective courses, research competency, and the dissertation. Core courses appear, for each specialization, in the order of recommended sequence. Students in the Clinical Psychology and Counseling Psychology specializations also complete a 750-hour minimum practicum and a 2,000-hour (1-year full-time or 2-year part-time) internship field experience.

## **Demonstration of Research Competency**

Prior to starting the dissertation, all students must demonstrate research competency. Research competency is demonstrated by the successful completion of the following:

- PSYC 8000 - Foundations for Graduate Study in Psychology
- PSYC 8311 - Research Design
- PSYC 8304 - Statistics 1
- PSYC 8305 - Statistics 2
- PSYC 8316 - Tests and Measurement
- Dissertation proposal

For the current dissertation processes and guidelines, students should refer to the *Dissertation Guidebook*, located under Dissertation Process of the Walden Research Center website.

## **Residency for Students in the Clinical Psychology and Counseling Psychology specializations**

Students in the Ph.D. in Psychology with specializations in Counseling Psychology and Clinical Psychology programs acquire a number of critical skills required for professional practice during their program of study. Academic residencies provide opportunities for face-to-face interactions that promote scholarship, socialization into the profession, skill building within a university community, and cohesion between students and instructors. These opportunities are focused during the Academic Year in Residence (AYR), which occurs during a consecutive 12-month period (typically starting between the second and third years of the program). If a student is unable to complete the required residency components in a 12-month period, the student must start the residency experience from the beginning.

**Note:** Students are advised to consult the School of Psychology Academic Year in Residence section of the *Walden University Student Handbook* for more information.

## **Psychological Assessment Coursework**

The purpose of the psychological assessment coursework is to provide a framework for doctoral students in the Clinical Psychology and Counseling Psychology specializations to develop their assessment knowledge and skills repertoire. Based on a developmental progression, students gain the following:

- An understanding of the assessment process and related legal, ethical, and diversity issues
- An understanding of principles of tests and measurement
- A set of basic skills in the administration, scoring, and interpretation of assessment measures across domains
- The ability to write an interpretive summary of assessment data

At the advanced level, doctoral students further develop their psychological assessment repertoire in the areas of testing, interpretation, data-based diagnoses and recommendations for intervention, and data-based psychological report writing.

Basic-level courses include the following:

- PSYC 8316 - Tests and Measurement
- PSYC 8341 - Psychological Assessment: Cognitive
- PSYC 8351 - Psychological Assessment: Personality

See the Course Descriptions section of this *Walden University Catalog* for more information on each course and its prerequisites.

Basic-level testing coursework may be waived (a) with equivalent coursework, with a grade of *B* or better, taken within 3 years of admission, or (b) with current supervised professional practice in psychological assessment and prior coursework with a grade of *B* or better in cognitive and personality/social-emotional assessment.

Students who are working as school psychologists or employed in positions that have psychological assessment as a major component and are considering the second waiver option

must submit supporting documentation to the coordinator of skill development on an individual basis. Supporting documentation must contain at a minimum the following:

- Copies of transcripts documenting comparable assessment coursework
- Samples of current comprehensive psychological evaluations with all identifiable information removed
- Letter from supervisor documenting current level of assessment skills and verification of employment

Please note that this option is not available to individuals with only “on-the-job” assessment experience and no supporting coursework.

### ***Clinical Psychology Specialization***

The Clinical Psychology\* specialization prepares individuals to practice as licensed psychologists with a commitment to social change in healthcare settings, community mental health centers, group practice settings, inpatient psychiatric settings, and private practice. Clinical psychologists promote psychological well-being, engage in prevention and early intervention of psychological difficulties, and provide treatment to clients experiencing severe psychopathology.

Clinical Psychology students will be prepared to

- Work with clients presenting with various levels of problems, including those with severe emotional distress or psychopathology.
- Use the scholar-practitioner model to apply theoretical and empirical models to assessment and interventions.
- Work with culturally diverse populations.
- Provide rural mental health services.
- Collaborate with psychiatry and other healthcare providers.
- Function as managers and supervisors in mental healthcare systems.
- Contribute to social change through original research, treatment outcome research, and program evaluation.

The Clinical Psychology specialization consists of a Foundation course, core and specialization courses, one elective course, demonstration of research competency, field experiences (practicum and internship), and dissertation. Additional courses may be taken to provide breadth and depth of learning.

***Note:*** Students must complete the following courses with a grade of B or better: PSYC 8331, PSYC 8341, PSYC 8351, PSYC 8342, PSYC 8343, PSYC 8721, and PSYC 8723.

***\*Note on licensure:*** The Clinical Psychology specialization in the Psychology Ph.D. program is designed to prepare graduates to qualify to sit for psychology licensing exams. This specialization is designed to meet the academic licensure requirements of many state psychology boards. However, Walden University’s specializations in Clinical Psychology and Counseling Psychology are not accredited by the American Psychological Association (APA) and have not

received designation by the Association of State and Provincial Psychology Boards/National Register (ASPPB/NR), which are requirements for licensure in some states. Because no graduate program can guarantee licensure upon graduation, we encourage students to consult the appropriate agency to determine specific requirements. For more information about licensure, students should visit the Association of State and Provincial Psychology Boards at <http://www.asppb.net/i4a/pages/index.cfm?pageid=3395> and contact the appropriate licensing body. International students are encouraged to identify and contact their appropriate licensing body.

### **Specialization Curriculum (159 cr.)**

#### **Foundation Course (6 cr.)**

- PSYC 8000 - Foundations for Graduate Study in Psychology

#### **Core Courses (65 cr.)**

- PSYC 8207 - History and Systems of Psychology
- PSYC 8215 - Lifespan Development
- PSYC 8221 - Psychology of Personality
- PSYC 8226 - Biopsychology
- PSYC 8237 - Cognitive Psychology
- PSYC 8247 - Social Psychology
- PSYC 8304 - Statistics 1
- PSYC 8316 - Tests and Measurement
- PSYC 8331 - Interviewing and Observational Strategies
- PSYC 8341 - Psychological Assessment: Cognitive
- PSYC 8351 - Psychological Assessment: Personality
- PSYC 8311 - Research Design
- PSYC 8305 - Statistics 2

#### **Specialization Courses (35 cr.)**

- PSYC 8342 - Psychotherapy Interventions 1
- PSYC 8343 - Psychotherapy Interventions 2
- PSYC 8700 - Psychology and Social Change
- PSYC 8705 - Ethics and Standards of Professional Practice
- PSYC 8721 - Advanced Psychopathology
- PSYC 8723 - Multicultural Counseling
- PSYC 8741 - Psychopharmacology

#### **Elective Course (5 cr.)**

One elective course, selected from the graduate courses in the School of Psychology, may be added anywhere in the student's program, provided prerequisites are met.

**Dissertation (30 cr.)**

- PSYC 9000 - Dissertation (30 cr. minimum—6 cr. per term for minimum 5 terms)

**Field Experience (18 cr.)**

- PSYC 8871 - Practicum (6 cr. minimum—3 cr. per term for minimum 2 terms)
- PSYC 8882 - Internship (12 cr.—3 cr. per term for 4 terms)

**Counseling Psychology Specialization**

The Counseling Psychology\* specialization endorses an integrated scholar-practitioner model of training and can prepare students for a variety of professional roles in direct service, teaching, research, and consultation. The program prepares students to practice as licensed psychologists who work with clients from a strengths-based perspective promoting functional relationships, healthy lifestyles, and positive career choices and roles, and preventing intrapsychic and interpersonal difficulties.

Counseling psychologists facilitate growth and development by building on identified client strengths and by helping clients understand and work within the unique context of their environment. Counseling psychologists work with clients and students of all ages and in various therapeutic settings, including private practice, university classrooms and counseling centers, community agencies, hospitals, EAP programs, personnel services, and human resource departments.

Counseling Psychology students will be able to

- Implement the scholar-practitioner model in the assessment and treatment of clients from diverse populations.
- Collaborate on multidisciplinary teams in a variety of mental health settings.
- Utilize a biopsychosocial perspective in diagnosis and treatment.
- Conceptualize counseling issues and problems based on counseling theory and research.
- Use evidence-based assessment and intervention techniques.
- Contribute to the field of psychology and to Walden University's mission of social change through original research, process and outcome research, and treatment evaluation.

The Counseling Psychology specialization consists of a Foundation course, core and specialization courses, one elective course, demonstration of research competency, field experiences (practicum and internship), and dissertation. Additional courses may be taken to provide breadth and depth of learning.

**Note:** Students must complete the following courses with a grade of *B* or better: PSYC 8331, PSYC 8341, PSYC 8351, PSYC 8342, PSYC 8343, PSYC 8720, and PSYC 8723.

**\*Note on licensure:** The Counseling Psychology specialization in the Psychology Ph.D. program is designed to prepare graduates to qualify to sit for psychology licensing exams. This specialization is designed to meet the academic licensure requirements of many state psychology boards. However, Walden University's specializations in Clinical Psychology and Counseling Psychology are not accredited by the American Psychological Association (APA) and have not



received designation by the Association of State and Provincial Psychology Boards/National Register (ASPPB/NR), which are requirements for licensure in some states. Because no graduate program can guarantee licensure upon graduation, we encourage students to consult the appropriate agency to determine specific requirements. For more information about licensure, students should visit the Association of State and Provincial Psychology Boards at <http://www.asppb.net/i4a/pages/index.cfm?pageid=3395> and contact the appropriate licensing body. International students are encouraged to identify and contact their appropriate licensing body.

### **Specialization Curriculum (159 cr.)**

#### **Foundation Course (6 cr.)**

- PSYC 8000 - Foundations for Graduate Study in Psychology

#### **Core Courses (65 cr.)**

- PSYC 8207 - History and Systems of Psychology
- PSYC 8215 - Lifespan Development
- PSYC 8221 - Psychology of Personality
- PSYC 8226 - Biopsychology
- PSYC 8304 - Statistics 1
- PSYC 8331 - Interviewing and Observational Strategies
- PSYC 8341 - Psychological Assessment: Cognitive
- PSYC 8351 - Psychological Assessment: Personality
- PSYC 8311 - Research Design
- PSYC 8316 - Tests and Measurement
- PSYC 8237 - Cognitive Psychology
- PSYC 8247 - Social Psychology
- PSYC 8305 - Statistics 2

#### **Specialization Courses (35 cr.)**

- PSYC 8342 - Psychotherapy Interventions 1
- PSYC 8343 - Psychotherapy Interventions 2
- PSYC 8700 - Psychology and Social Change
- PSYC 8705 - Ethics and Standards of Professional Practice
- PSYC 8720 - Diagnosis and Assessment
- PSYC 8723 - Multicultural Counseling
- PSYC 8725 - Group Therapy

#### **Elective Course (5 cr.)**

One elective course, selected from the graduate courses in the School of Psychology, may be added anywhere in the student's program, provided prerequisites are met.

**Dissertation (30 cr.)**

- PSYC 9000 - Dissertation

**Field Experience (18 cr.)**

- PSYC 8871 - Practicum (6 cr. minimum—3 cr. per term for minimum 2 terms)
- PSYC 8882 - Internship (12 cr.—3 cr. per term for 4 terms)

**General Psychology Specialization**

The General Psychology specialization—with tracks in Educational Psychology and in Research and Evaluation—prepares individuals to teach, mentor, and/or conduct culturally and contextually relevant research in psychology in institutions of higher education and to engage their knowledge and skills in applied settings.

**Educational Psychology Track (121 cr.)**

The Educational Psychology track prepares students to integrate psychological theory and practice, using scientific methods and evidence-based practice to inform undergraduate and graduate instruction that incorporates issues of cultural and individual diversity.

Students in the Educational Psychology track will

- Acquire a broad knowledge base in psychology and its history, ethics, research methods, and applications.
- Use psychological theory, research, and practice to inform instructional process and content.
- Apply psychological theories and research to educational practice.
- Develop the ability to promote attitudes and skills for lifelong learning, critical inquiry, and problem-solving in graduate and undergraduate learners.
- Develop the research skills necessary to make scholarly contributions to the field of psychology.

The Educational Psychology track consists of a Foundation course, core and specialization courses, three elective courses, demonstration of research competency, and dissertation. Additional courses may be taken to provide breadth and depth of learning.

**Foundation Course (6 cr.)**

- PSYC 8000 - Foundations for Graduate Study in Psychology

**Core Courses (40 cr.)**

- PSYC 8207 - History and Systems of Psychology
- PSYC 8215 - Lifespan Development
- PSYC 8226 - Biopsychology
- PSYC 8237 - Cognitive Psychology
- PSYC 8304 - Statistics 1
- PSYC 8311 - Research Design
- PSYC 8316 - Tests and Measurement
- PSYC 8305 - Statistics 2

**Specialization Courses (30 cr.)**

- PSYC 8700 - Psychology and Social Change
- PSYC 8705 - Ethics and Standards of Professional Practice
- PSYC 8760 - Educational Psychology
- PSYC 8762 - Teaching of Psychology
- PSYC 8763 - Principles of Instructional Design
- PSYC 8764 - Instructional Design for Online Course Development

**Elective Courses (15 cr.)**

Three elective courses selected from the graduate courses in the School of Psychology may be added anywhere in the student's program provided prerequisites are met.

**Dissertation (30 cr.)**

- PSYC 9000 - Dissertation (30 cr. minimum—6 cr. per term for minimum 5 terms)

**Research and Evaluation Track (121 cr.)**

The Research and Evaluation track prepares students to integrate psychological theory and practice, using scientific methods and evidence-based practice to apply their knowledge and skills about research and evaluation in a variety of settings.

Students in the Research and Evaluation track will

- Acquire a broad knowledge base in psychology and its history, ethics, research methods, and applications.
- Develop the research skills necessary to make culturally and contextually relevant scholarly contributions to the field of psychology.
- Analyze and evaluate the theories and applications underlying multiple data collection techniques used in psychology.
- Use psychological theory and research to inform practice in a variety of public, private, governmental, and nongovernmental settings.
- Use research and evaluation strategies to study the efficacy, integrity, acceptability, transferability, and contextual and cultural relevance of programs and interventions.

Students in this track also will

- Conceptualize, design, analyze, and evaluate a wide variety of research approaches and methodologies.
- Develop, implement, and evaluate programs and strategies.
- Collaborate with professionals in the development and application of research.
- Use research and evaluation strategies to examine social change from the psychological perspective of individuals, groups, organizations, and local and global communities.
- Serve as consultants in research, data analysis, and evaluation in a range of settings (e.g., higher education, government, public sector).

The Research and Evaluation track consists of a Foundation course, core and specialization courses, four elective courses, demonstration of research competency, and dissertation. Additional courses may be taken to provide breadth and depth of learning.

### **Foundation Course (6 cr.)**

- PSYC 8000 - Foundations for Graduate Study in Psychology

### **Core Courses (45 cr.)**

- PSYC 8207 - History and Systems of Psychology
- PSYC 8215 - Lifespan Development
- PSYC 8226 - Biopsychology
- PSYC 8247 - Social Psychology
- PSYC 8304 - Statistics 1
- PSYC 8311 - Research Design
- PSYC 8316 - Tests and Measurement
- PSYC 8300 - Philosophical Foundations in Psychological Research
- PSYC 8305 - Statistics 2

### **Specialization Courses (20 cr.)**

- PSYC 8306 - Statistics 3
- PSYC 8310 - Qualitative Analysis
- PSYC 8700 - Psychology and Social Change
- PSYC 8705 - Ethics and Standards of Professional Practice

### **Elective Courses (20 cr.)**

Four elective courses selected from the graduate courses in the School of Psychology may be added anywhere in the student's program provided prerequisites are met.

### **Dissertation (30 cr.)**

- PSYC 9000 - Dissertation (30 cr. minimum—6 cr. per term for minimum 5 terms)

### **Health Psychology Specialization (Ph.D.)**

The Health Psychology specialization educates students on the complex relationship among psychological, social, and biological factors implicated in health and illness. This research-focused program prepares students to work in a variety of settings, such as health and wellness centers, corporations, research institutions, and academic institutions in research, teaching, psychoeducational, and administrative positions.

Health Psychology students will be able to

- Articulate and apply theoretical models of psychophysiological wellness, health, and immunocompetence.
- Identify and moderate personal and environmental factors that impact health.

- Understand and apply evidence-based psychological interventions that emphasize the role of stress on health.
- Describe psychotropic medications and their use in the treatment of mental and behavioral disorders.
- Articulate alternatives to pharmacological treatment that are less invasive and less disruptive to the body, and have an evidence base of effectiveness.
- Describe current concepts, theories, and research about neuropsychology, neuroanatomy, neuropathology, and psychoneuroimmunology (PNI).

These students will also be able to

- Recommend evidence-based mind/body interventions to help patients establish symptom management or attenuate physical illnesses.
- Articulate the impact of nutrition on psychological dysfunction.
- Use nutritional models to promote psychological wellness and mitigate illness.
- Use behavioral nutrition as an approach to psychological and psychophysiological illness and abnormal behavior.
- Understand current ethical standards and legal responsibilities of health psychologists, including those pertaining to psychological practice and research.
- Interact with medical professionals in practice and research on a peer-relationship level.

The Health Psychology specialization consists of a Foundation course, core and specialization courses, two elective courses, demonstration of research competency, and a dissertation.

### **Specialization Curriculum (121 cr.)**

#### **Foundation Course (6 cr.)**

- PSYC 8000 - Foundations for Graduate Study in Psychology

#### **Core Courses (35 cr.)**

- PSYC 8207 - History and Systems of Psychology
- PSYC 8226 - Biopsychology
- PSYC 8247 - Social Psychology
- PSYC 8304 - Statistics 1
- PSYC 8311 - Research Design
- PSYC 8316 - Tests and Measurement
- PSYC 8305 - Statistics 2

#### **Specialization Courses (40 cr.)**

- PSYC 8700 - Psychology and Social Change
- PSYC 8705 - Ethics and Standards of Professional Practice
- PSYC 8710 - Clinical Neuropsychology
- PSYC 8741 - Psychopharmacology
- PSYC 8745 - Health Psychology

- PSYC 8746 - Behavioral Nutrition
- PSYC 8747 - Psychoneuroimmunology
- PSYC 8748 - Stress and Coping

### **Elective Courses (10 cr.)**

Two elective courses selected from the graduate courses in the School of Psychology may be added anywhere in the student's program provided prerequisites are met.

### **Dissertation (30 cr.)**

- PSYC 9000 - Dissertation (30 cr. minimum—6 cr. per term for minimum 5 terms)

## **Organizational Psychology Specialization**

The Organizational Psychology specialization prepares students to work within industry, government, and university settings as practitioners, consultants, and researchers. Specifically, this specialization focuses on issues related to organizational behavior, leadership, and development; personnel staffing, development, and well-being; and effective, ethical consultation and research practices. Students may select one of three tracks offered in this specialization—Industrial, Organizational, or Consultation.

Organizational Psychology students will

- Acquire a broad knowledge base in psychology and its history, research methods, and applications.
- Acquire the background needed to develop consultative relationships with industry, government, military, and other organizations.
- Develop the skills to conduct organizational research in profit, nonprofit, government, and other settings.
- Develop the requisite knowledge and experience to teach organizational psychology at the university level.
- Acquire an understanding of ethical concerns in the field and the ability to employ ethical and accepted standards of practice.
- Achieve a perspective on the integral nature of cultural diversity in organizations and the ability to effectively incorporate it.

The Organizational Psychology specialization consists of a Foundation course, core and specialization courses, two track courses, three elective courses, demonstration of research competency, and the dissertation sequence.

### **Specialization Curriculum (121 cr.)**

#### **Foundation Course (6 cr.)**

- PSYC 8000 - Foundations for Graduate Study in Psychology

#### **Core Courses (40 cr.)**

- PSYC 8207 - History and Systems of Psychology

- PSYC 8215 - Lifespan Development
- PSYC 8237 - Cognitive Psychology
- PSYC 8247 - Social Psychology
- PSYC 8304 - Statistics 1
- PSYC 8311 - Research Design
- PSYC 8316 - Tests and Measurement
- PSYC 8305 - Statistics 2

**Specialization Courses (20 cr.)**

- PSYC 8700 - Psychology and Social Change
- PSYC 8705 - Ethics and Standards of Professional Practice
- PSYC 8750 - Foundations of Industrial/Organizational Psychology
- PSYC 8756 - International/Cross-Cultural Issues in Organizations

**Track Courses (10 cr.)**

Students complete both courses for one track.

**Industrial Track**

- PSYC 8753 - Career Counseling
- PSYC 8754 - Personnel Psychology in the Workplace

**Organizational Track**

- PSYC 8752 - Psychology of Organizational Behavior
- PSYC 8755 - Leadership and the Process of Change

**Consultation Track**

- PSYC 8784 - Psychological Consultation
- PSYC 8820 - Successful Practice Management

**Elective Courses (15 cr.)**

Three elective courses selected from the graduate courses in the schools of psychology and management may be added anywhere in the student's program, provided prerequisites are met.

**Dissertation (30 cr.)**

- PSYC 9000 - Dissertation

## Post-Doctoral Certificate Programs

### Post-Doctoral Clinical Child Psychology Certificate

Individuals with doctoral degrees in psychology can pursue two types of post-doctoral certificates at Walden University: Respecialization Certificates and a Specialized Learning Certificate.

**Specialized Learning:** This provides students with advanced training in a focused area. The School of Psychology currently offers one Specialized Learning Certificate: Clinical Child Psychology.

Students complete all courses listed for the specialization area.

The Clinical Child Psychology certificate program provides practicing clinicians with training, including a practicum experience, in clinical child psychology. Students learn about diagnosis; treatment planning; individual, family, and group therapy; and crisis intervention as they relate to children.

**Note:** Post-doctoral students who have not completed a Clinical Psychology or Counseling Psychology specialization in the School of Psychology will also be required to complete PSYC 8705 Ethics and Standards of Professional Practice.

#### **Clinical Child Psychology Certificate (23 cr.)**

- PSYC 8712 - Clinical Child Neuropsychology
- PSYC 8719 - Developmental Psychopathology
- PSYC 8724 - Child Psychotherapy
- PSYC 8726 - Couples and Family Counseling
- PSYC 8871 - Practicum\*

\*Only one term of PSYC 8871 is required for certificate students; however, students can register for an additional term if additional hours are needed.

### Post-Doctoral Respecialization Certificate

Individuals with doctoral degrees in psychology can pursue two types of post-doctoral certificates at Walden University: Respecialization Certificates and Specialized Learning Certificates.

**Respecialization:** Students gain theory and knowledge in a specialization other than the one on which they focused in their degree work. Students complete a unique program of study that accounts for previous coursework and includes courses required to achieve essential knowledge in the new specialization. They may choose from any of the specializations offered in Walden's Ph.D. in Psychology program.

- Foundation course: PSYC 8000 - Foundations for Graduate Study



- Specific coursework is determined by the student and the School of Psychology's program director for the specialization chosen.
- Field experience: Students choosing to respecialize into the Clinical Psychology or Counseling Psychology specializations must complete a practicum, an internship, and an Academic Year in Residence.

### **Note on Licensure**

The Respecialization Certificates in (Clinical and Counseling Psychology are designed to prepare graduates to qualify to sit for psychology licensing exams. These certificates are designed to meet the academic licensure requirements of many state psychology boards. However, Walden University's licensure certificates in psychology are not accredited by the American Psychological Association (APA) and have not received designation by the Association of State and Provincial Psychology Boards/National Register (ASPPB/NR), which are requirements for licensure in some states. Because no graduate program can guarantee licensure upon graduation, we encourage students to consult the appropriate agency to determine specific requirements. For more information about licensure, students should visit the Association of State and Provincial Psychology Boards' Contact Page and contact the appropriate licensing body. International students are encouraged to identify and contact their appropriate licensing body.

# EXHIBIT 33

**From:** Janet Harrison <[janet.harrison@waldenu.edu](mailto:janet.harrison@waldenu.edu)>  
**Sent:** Wednesday, November 2, 2016 5:23 PM  
**To:** [jeharrison100@hotmail.com](mailto:jeharrison100@hotmail.com)  
**Subject:** Fwd: Doc Study resources

----- Forwarded message -----

**From:** DBAProgramDirector <[DBAProgramDirector@waldenu.edu](mailto:DBAProgramDirector@waldenu.edu)>  
**Date:** Tue, Mar 5, 2013 at 3:42 PM  
**Subject:** Doc Study resources  
**To:**

Hello future doctor,

You are receiving this message as you have completed 5 sessions of 9000. I wanted to alert you to some resources that might be helpful as you complete your DBA program this year. I really like the sound of Dr. and I am confident this can be an accomplishment that you can complete this year!!!

For now, I just wanted to remind you of some resources that will help you.

1. **Intensive Residencies** provide students an opportunity to work in smaller groups with a DBA faculty and Writing Center professional for 4 days. Intensives are cheaper than repeating DDBA 9000 courses. Students who attended in November completed section 1 of their study while at Intensive (with the exception of the Literature Review). If you want to attend an Intensive workshop " contact your advisor at [somdocadvising@waldenu.edu](mailto:somdocadvising@waldenu.edu) soon, as space is limited. The next available Intensives are:

- a. May 15-19 Phoenix, Arizona
- b. July 10-14 Atlanta, Georgia

2. Read **recently published doc studies**.

The steps are below, but here is a link to a guide that also shows you how to find DBA doctoral studies (includes video demonstration) in about 1 minute

<http://libraryguides.waldenu.edu/content.php?pid=192643&sid=1615553>

- a. Go to the Library Homepage.
- b. Click on the blue Research Databases button.
- c. Click on the Dissertations link.
- d. Scroll down and click on the "Connect to Walden Dissertations Only" link.
- e. Now you need to search D.B.A and change the drop-down to the right of the search box to "Degree" as shown in the screenshot linked here:  
<http://screencast.com/t/qmHaj>

3. **View "just in time" webinars**. Here are instructions on how to download DBA studies in about 1 minute:

- a. Go to the writing center <http://writingcenter.waldenu.edu/>
- b. Click on Tutoring Tab

- c. Scroll down to webinars
- d. Scroll down to near the bottom of the page and select webinars of interest on numerous topics, including APA, Annotated bibliographies, Writing a literature review, Preparing for Form & Style review, Writing the data collection, How to develop tables and figures, and many other topics.

4. **Grammarly.** This allows you the opportunity to identify issues associated with passive voice, grammar/punctuation errors. Here are instructions.

Follow the instructions below for adding Grammarly to your copy of MS Word.

- a. Close all MS Word files and any other MS Office files.
- b. Go to <http://www.grammarly.com/desktop/> and click on download and save it on your desktop. Now, click on the downloaded file, click run and next. It will take about a minute to install.
- c. Open up a MS Word file with text (not a blank one) and go to home tab and you will see Grammarly on the far right side located in your top tool bar.
- d. On the top right side of the tool bar, the Grammarly area will appear – click on it
- e. Click Academic from the drop down menu
- f. You will be prompted to insert your Grammarly login and password (from the account you set up for free through the Writing Center).
- g. You can check MS Word documents for grammar/spelling/punctuation, and plagiarism errors using Grammarly as the adviser.

5. **Use the rubric.** There are 7 levels of review and each reviewer will lay the rubric down next to your study to ensure all the required key components are included. Save yourself lost time by doing it yourself. The rubric, process checklist, and other documents are located at:

<http://researchcenter.waldenu.edu/DBA-Doctoral-Study-Process-and-Documents.htm>

- Process Checklist – this provides step by step instructions on the process of getting your paper through the 7 levels of review required
- Prospectus / Chair Request Form
- Doctoral Study Rubric – each reviewer will lay down the rubric next to your paper to ensure you have captured required components
- Doctoral Study Template
- Available Faculty for Chair/Committees
- New Shorter IRB Form (optional)

As always we are in the success business and my hope is 2013 will be a terrific year for you.

My best,

Freda

Freda Turner

Program Director

DBA Program Director Office

Walden University

Email: [DBAProgramDirector@Waldenu.edu](mailto:DBAProgramDirector@Waldenu.edu)

**DBA Intensives:** <http://www.capstoneintensives.waldenu.edu/DBA-Doctoral-Study-Intensive.htm>

**DBA Residency Calendar:** <http://residencies.waldenu.edu/Calendar/D.B.A.-Residency-Calendar.htm>

# EXHIBIT 34

# WALDEN UNIVERSITY

*A higher degree. A higher purpose.*

[Home](#) > [Degree Programs](#) > [Doctoral](#) > [Ph.D. in Psychology](#) > [Specializations](#) >

## Health Psychology

### Health Psychology

Health Psychology specialization students plan to practice in a variety of health care settings and academic institutions. Many health psychologists practice in medical centers, medical research settings, business and industry, government and military, as well as sports and fitness settings. Others teach and engage in research at colleges and universities.

### Completion Requirements

- 121 total quarter credit hours, course-based
  - Core courses (81 cr.)
  - Elective courses (10 cr.)
  - Dissertation (30 cr.)
- Professional Development Plan and Program of Study (included in PSYC 8000)
- Minimum 12 quarters enrollment
- 3.0 GPA
- 20 days of [residency](http://www.waldenu.edu/Degree-Programs/Doctorate/PhD-Residences.htm) (two 4-day and two 6-day residencies)

For a personalized estimate of your time to completion, call your enrollment advisor at 1-866-492-5336.

### Core Courses

| Course Code | Course Title                                  | Credits |
|-------------|-----------------------------------------------|---------|
| PSYC 8000   | Foundations for Graduate Study in Psychology  | 6       |
| PSYC 8207   | History and Systems of Psychology             | 5       |
| PSYC 8226   | Biopsychology                                 | 5       |
| PSYC 8304   | Statistics 1                                  | 5       |
| PSYC 8311   | Research Design*                              | 5       |
| PSYC 8247   | Social Psychology                             | 5       |
| PSYC 8316   | Tests and Measurement*                        | 5       |
| PSYC 8305   | Statistics 2                                  | 5       |
| PSYC 8700   | Psychology and Social Change                  | 5       |
| PSYC 8705   | Ethics and Standards of Professional Practice | 5       |
| PSYC 8710   | Clinical Neuropsychology*                     | 5       |
| PSYC 8741   | Psychopharmacology*                           | 5       |
| PSYC 8745   | Health Psychology                             | 5       |
| PSYC 8746   | Behavioral Nutrition*                         | 5       |
| PSYC 8747   | Psychoneuroimmunology*                        | 5       |
| PSYC 8748   | Stress and Coping*                            | 5       |

DIAGNOSIS & ASSESSMENT  
 Qualitative Analysis

\*See course descriptions for prerequisites.

## Elective Courses

Two courses, selected from the graduate courses in the School of Psychology, may be added anywhere in your program, provided that you meet the prerequisites.

## Dissertation and Field Experience

| Course Code | Course Title           | Credits |
|-------------|------------------------|---------|
| PSYC 9000   | Dissertation Research* | 30      |

\*See course descriptions for prerequisites.

[Course Descriptions \(http://www.waldenu.edu/Degree-Programs/Doctorate/21258.htm\)](http://www.waldenu.edu/Degree-Programs/Doctorate/21258.htm)



# EXHIBIT 35

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**From:** Janet Harrison <[janet.harrison@waldenu.edu](mailto:janet.harrison@waldenu.edu)>

**Sent:** Thursday, October 13, 2016 9:19 PM

**To:** [jeharrison100@hotmail.com](mailto:jeharrison100@hotmail.com)

**Subject:** Fwd: DDBA-9000-75, Doctoral Study Completion.2015 Summer Sem 05/04-08/23-PT2: Please take note—the bar for progress and your continued enrollment in the DBA Program is going to be monitored more closely-Remember, you must demonstrate engagement and sati...

----- Forwarded message -----

**From:** <[tim.truitt@waldenu.edu](mailto:tim.truitt@waldenu.edu)>

**Date:** Thu, May 28, 2015 at 5:25 PM

**Subject:** DDBA-9000-75, Doctoral Study Completion.2015 Summer Sem 05/04-08/23-PT2: Please take note—the bar for progress and your continued enrollment in the DBA Program is going to be monitored more closely-Remember, you must demonstrate engagement and satisfactory progress in the Program: Starting with the next term (May 2015) a minimum of 800 points is required to achieve a course grade of Satisfactory in DDBA

**To:**

**Please take note—the bar for progress and your continued enrollment in the DBA Program is going to be monitored more closely-Remember, you must demonstrate engagement and satisfactory progress in the Program:**

Starting with the next term (May 2015) a minimum of 800 points is required to achieve a course grade of Satisfactory in DDBA 9000. To reiterate, the minimum passing number of points for DDBA 9000 is moving from 700 points to 800 points. The bar has been raised. Please ensure that all of your DDBA 9000 students are aware of this.

Please remember that it is our policy that if a student does not make reasonable progress between assignments and during the term then their course grade should reflect unsatisfactory progress. Please ensure that all of your DDBA 9000 students are aware of this. The leadership team is very concerned that some students have been awarded a grade of satisfactory for assignments and for the overall course grade when little or no progress was made. Such students incur a heavy debt burden and are often dissatisfied and problematic.

Urge your DDBA 9000 students to “strive for five”, but remind them that completing a doctoral study is a complex process of intellectual discovery, attention to detail and in-depth review. Speed is not the objective. Quality of work is the only measure of success.

# EXHIBIT 36

From: **Student Petitions** <[studentpetitions@waldenu.edu](mailto:studentpetitions@waldenu.edu)>

Date: Wed, Mar 23, 2016 at 9:17 AM

To: Kelli Callahan <[kelli.callahan@waldenu.edu](mailto:kelli.callahan@waldenu.edu)>

Kelli Callahan

A00156966

The School of Psychology Academic Petition Committee reviewed this petition, and has approved a tuition waiver of 6 weeks for the Winter 2016 quarter, due to delays with the MyDr system.

This decision was approved by the CSBS Product Manager.

Please process the waiver, and let us know if you need additional information. Thank you,

Sincerely,

Academic Petition Committee

School of Psychology

Powered by Onyx Software. Please do not remove the following text as it helps us to serve you better.  
[[-7817215.13958798--]]

-----  
From: **Kelli Callahan** <[kelli.callahan@waldenu.edu](mailto:kelli.callahan@waldenu.edu)>

Date: Sun, Mar 27, 2016 at 9:50 PM

To: Student Petitions <[studentpetitions@waldenu.edu](mailto:studentpetitions@waldenu.edu)>

**"Due to delays with the MyDR system"**? Is this really going to serve as the basis for the refund?

This was due once again to a faculty member who did not monitor the MyDR system OR her email.

I specifically provided documentation of the email that was sent to this faculty member which was blatantly ignored. In addition, this was not the first time this has occurred. I have been enrolled in this online business for SEVEN years now and they delays have been a **repeated** occurrence.

I would like to know why this was not incorporated into the justification that was provided as a basis for my refund.

-----  
From: **Student Petitions** <[studentpetitions@waldenu.edu](mailto:studentpetitions@waldenu.edu)>

Date: Tue, Mar 29, 2016 at 4:58 PM

To: Kelli Callahan <[kelli.callahan@waldenu.edu](mailto:kelli.callahan@waldenu.edu)>

Hello Kelly.

The Petitions Committee uses the "delays with the MyDr system" for billing purposes for any petition that entailed delays with the faculty and the myDr system. However, the committee and your Program Director, Dr. Sickel, did review the documentation that you submitted to your Academic Advisor including the timelines and e-mail documentation to determine the outcome of your petition.

Sincerely,

Academic Petition Committee  
School of Psychology

-----Original Message-----

From: Kelli Callahan  
Sent: 03/27/2016 09:50 PM  
To: Student Petitions  
Cc:  
Subject: Re: The School of Psychology Academic Petition Committee Decision

**"Due to delays with the MyDR system"**? Is this really going to serve as the basis for the refund?

This was due once again to a faculty member who did not monitor the MyDR system OR her email.

I specifically provided documentation of the email that was sent to this faculty member which was blatantly ignored. In addition, this was not the first time this has occurred. I have been enrolled in this online business for SEVEN years now and they delays have been a **repeated** occurrence.

I would like to know why this was not incorporated into the justification that was provided as a basis for my refund.

On Wed, Mar 23, 2016 at 9:17 AM, Student Petitions <[studentpetitions@waldenu.edu](mailto:studentpetitions@waldenu.edu)> wrote:

Kelli Callahan  
A00156966

The School of Psychology Academic Petition Committee reviewed this petition, and has approved a tuition waiver of 6 weeks for the Winter 2016 quarter, due to delays with the MyDr system.

This decision was approved by the CSBS Product Manager.

Please process the waiver, and let us know if you need additional information. Thank you,

Sincerely,

Academic Petition Committee  
School of Psychology

Powered by Onyx Software. Please do not remove the following text as it helps us to serve you better.  
[[-7817215.13986002--]]

-----  
From: **Kelli Callahan** <[kelli.callahan@waldenu.edu](mailto:kelli.callahan@waldenu.edu)>

Date: Thu, Mar 31, 2016 at 9:42 PM

To: [forensickc@yahoo.com](mailto:forensickc@yahoo.com)

# EXHIBIT 37

----- Forwarded message -----

From: **Elisha R. Galaif** <[elisha.galaif@waldenu.edu](mailto:elisha.galaif@waldenu.edu)>

Date: Mon, Jul 6, 2015 at 2:03 PM

Subject: RE: new 2nd committee member

To: Kelli Callahan <[kelli.callahan@waldenu.edu](mailto:kelli.callahan@waldenu.edu)>

Please discuss directly with Dr. Perry, your PD.

Elisha Galaif, Ph.D.  
Senior Research Coordinator  
School of Psychology  
College of Social and Behavioral Sciences  
Walden University  
100 Washington Ave. South, Suite 900  
Minneapolis, MN 55401  
[elisha.galaif@waldenu.edu](mailto:elisha.galaif@waldenu.edu)

[www.WaldenU.edu](http://www.WaldenU.edu)

**From:** Kelli Callahan [mailto:[kelli.callahan@waldenu.edu](mailto:kelli.callahan@waldenu.edu)]

**Sent:** Saturday, July 04, 2015 3:39 PM

**To:** Elisha R. Galaif

**Subject:** Re: new 2nd committee member

Anthony Perry. I also submitted a tuition reimbursement request from last term as I received no feedback from my methodology expert over the previous term. I have still not received any feedback regarding this tuition reimbursement request to date either.

Thank you,

Kelli Callahan

On Thu, Jul 2, 2015 at 7:03 AM, Elisha R. Galaif <[elisha.galaif@waldenu.edu](mailto:elisha.galaif@waldenu.edu)> wrote:

Who is your PD?

Elisha Galaif, Ph.D.  
Senior Research Coordinator  
School of Psychology



College of Social and Behavioral Sciences  
Walden University  
100 Washington Ave. South, Suite 900  
Minneapolis, MN 55401  
[elisha.galaif@waldenu.edu](mailto:elisha.galaif@waldenu.edu)

[www.WaldenU.edu](http://www.WaldenU.edu)

**From:** Kelli Callahan [mailto:[kelli.callahan@waldenu.edu](mailto:kelli.callahan@waldenu.edu)]  
**Sent:** Wednesday, July 01, 2015 7:19 PM

**To:** Elisha R. Galaif  
**Subject:** Re: new 2nd committee member

I am still waiting to hear back from my program director in reference to an email that was sent back on June 7th....

On Mon, Jun 29, 2015 at 8:56 PM, Elisha R. Galaif <[elisha.galaif@waldenu.edu](mailto:elisha.galaif@waldenu.edu)> wrote:

Please discuss with your Program Director.

Elisha Galaif, Ph.D.  
Senior Research Coordinator  
School of Psychology  
College of Social and Behavioral Sciences  
Walden University  
100 Washington Ave. South, Suite 900  
Minneapolis, MN 55401  
[elisha.galaif@waldenu.edu](mailto:elisha.galaif@waldenu.edu)

[www.WaldenU.edu](http://www.WaldenU.edu)

**From:** Kelli Callahan [mailto:[kelli.callahan@waldenu.edu](mailto:kelli.callahan@waldenu.edu)]  
**Sent:** Monday, June 29, 2015 8:26 PM  
**To:** Elisha R. Galaif  
**Subject:** Re: new 2nd committee member

Elisha,

Given that I have been waiting almost FOUR MONTHS for feedback on my last submitted draft of Chapter 3, is there any way to expedite this process?

The last few times that I have had to engage in this process, there has been a significant delay given the lack of response from instructors or indicating that they are full and not taking on new students.

Sincerely,

Kelli Callahan

On Mon, Jun 29, 2015 at 1:31 PM, Elisha R. Galaif <[elisha.galaif@waldenu.edu](mailto:elisha.galaif@waldenu.edu)> wrote:

Hello. Dr. Devitt, your current 2<sup>nd</sup> member has resigned from Walden effective next term so you will need to find a new 2<sup>nd</sup> member. Please use the attached list to do so. If you need further assistance, please let me know. Take care, Dr. Galaif

Elisha Galaif, Ph.D.  
Senior Research Coordinator  
School of Psychology  
College of Social and Behavioral Sciences  
Walden University  
100 Washington Ave. South, Suite 900  
Minneapolis, MN 55401  
[elisha.galaif@waldenu.edu](mailto:elisha.galaif@waldenu.edu)

[www.WaldenU.edu](http://www.WaldenU.edu)

# EXHIBIT 38

----- Forwarded message -----

From: **Kelli Callahan** <[kelli.callahan@waldenu.edu](mailto:kelli.callahan@waldenu.edu)>

Date: Sun, Sep 13, 2015 at 5:49 PM

Subject: Methodology Expert

To: Tracy Mallett <[tracy.mallett@waldenu.edu](mailto:tracy.mallett@waldenu.edu)>

Hi Dr. M.,

I wanted to solicit your assistance in trying to locate a new methodology expert since my last one quit Walden a few months back. I have been utilizing the list as provided by the research department and have all but exhausted this list of individuals to date. Most do not respond to emails or indicate that they are not available for a committee position at the current time. I also contacted the research department a while back to express my concerns and they merely said to just contact my department chair.

The problem however is that I previously contacted the department chair back in June of this year to discuss the fact that my methodology expert quit abruptly after several months of no communication, thus leaving several of us in the lurch however I only received an email of acknowledgment from his "assistant".

Is there anything you can do to help me secure a new methodology expert? I would appreciate any assistance or advice you can provide at this time. Thanks in advance Dr. M.

Sincerely,

Kelli Callahan

PSYCH-9000

Student Id: A00156966

# EXHIBIT 39

----- Forwarded message -----

From: **Tracy Mallett** <[tracy.mallett@waldenu.edu](mailto:tracy.mallett@waldenu.edu)>

Date: Wed, Oct 12, 2016 at 3:11 PM

Subject: Re: Phone conference request re: URR feedback

To: "Amy E. Sickel" <[amy.sickel@waldenu.edu](mailto:amy.sickel@waldenu.edu)>

Cc: Patti Barrows <[patti.barrows@waldenu.edu](mailto:patti.barrows@waldenu.edu)>, Kelli Callahan <[kelli.callahan@waldenu.edu](mailto:kelli.callahan@waldenu.edu)>, "Charles T. Diebold" <[tom.diebold@waldenu.edu](mailto:tom.diebold@waldenu.edu)>

Ok, got it! Sorry for looping you in on these emails, Dr Barrows!

On Wednesday, October 12, 2016, Amy E. Sickel <[amy.sickel@waldenu.edu](mailto:amy.sickel@waldenu.edu)> wrote:

Hi Dr. Mallett,

My apologies if I was unclear, I meant we should schedule a phone call with just the committee (and myself if you like) and the student.

Dr. Barrows as URR is available for a phone call with you as chair, however.

~~~~~

Amy E. Sickel, Ph.D.

Program Director,

Academic Psychology Doctoral Programs

Walden University

100 Washington Avenue South, Suite 900

Minneapolis, MN 55401

amy.sickel@waldenu.edu

www.waldenu.edu

From: Tracy Mallett [mailto:tracy.mallett@waldenu.edu]

Sent: Wednesday, October 12, 2016 6:05 PM

To: Patti Barrows; Amy E. Sickel; Kelli Callahan; Charles T. Diebold

Subject: Phone conference request re: URR feedback

Hi Dr Barrows!

Thank you for your recent URR feedback for Kelli Calahan's draft. Would you be amenable to scheduling a phone conference to go over your suggestions?

I am available tomorrow (Thursday) from 1 pm to 5 pm est, or after 7 pm est, or Friday or Saturday anytime. Can you please let me know your availability?

Thanks so much !

EXHIBIT 40

----- Forwarded message -----

From: **Fred Walker** <Fred.Walker@waldenu.edu>

Date: Thu, Sep 4, 2014 at 3:10 PM

Subject: RE: How to switch faculty chair Janet Harrison (Dr. Savard)

To: Janet Harrison <janet.harrison@waldenu.edu>

Janet,

See the attached Chair request form. Sending it in early does not buy you anything. I prefer it be completed as scholarly as possible as I send it to the faculty requested. The faculty either accept or decline as a Chair. The faculty may decline as a Chair, but want a 2nd committee position or URR position.

Enjoy the Residency my friend and save the fit for something else – LOL.

Does this help?

Fred Walker

Associate Director, DBA Program

Walden University

Email: Fred.Walker@waldenu.edu

From: Janet Harrison [mailto:janet.harrison@waldenu.edu]

Sent: Thursday, September 04, 2014 2:29 PM

To: Fred Walker

Subject: Re: How to switch faculty chair Janet Harrison (Dr. Savard)

OH---ok! I wasn't aware that we could do this? I thought it was pretty much "we get what we get and we don't pitch a fit". I'll do this before the end of Week 2.

Thank you again, so much!

On Tue, Sep 2, 2014 at 8:37 PM, Fred Walker <Fred.Walker@waldenu.edu> wrote:

Janet,

Feel free to call me Fred.

One idea now that you have time is to send the Problem Statement, Purpose Statement, and research Question to faculty you are considering. Interview them to see what would be a good fit.

Let me know how I can help.

Fred Walker

Associate Director, DBA Program

Walden University

Email: Fred.Walker@waldenu.edu

From: Janet Harrison [mailto:janet.harrison@waldenu.edu]

Sent: Tuesday, September 02, 2014 8:29 PM

To: Fred Walker

Subject: Re: How to switch faculty chair Janet Harrison (Dr. Savard)

Thank you very much Mr Walker. I'll do as you suggest. A change in T2 will be nice.

On Mon, Sep 1, 2014 at 10:00 PM, Fred Walker <Fred.Walker@waldenu.edu> wrote:

Janet,

Please see the attached Chair Request Form and Available faculty list. Unfortunately Dr House is not available at this time. The classes open in a few hours and I could not get you moved by then as all of the support staff are away from the office.

We could work on this for the October 27th start if you want.

Sorry, but it is too late for this session start.

Fred Walker

Associate Director, DBA Program

Walden University

Email: Fred.Walker@waldenu.edu

From: Freda Turner

Sent: Monday, September 01, 2014 9:06 PM

To: Janet Harrison

Cc: James Savard; Fred Walker

Subject: RE: How to switch faculty chair Janet Harrison (Dr. Savard)

Thanks Janet and I'm sure you and Dr. Savard has had some great opportunities together and hopefully moving in the right direction and I'm sure Dr. Savard will continue to work on the committee to help.

I'm copying Fred Walker. We are past the date the registrar allows us to change chairs but perhaps Fred can work some magic – if not we can make the change in the Oct 27th start.

We are only allowed to change chairs between sessions. So go to the centralized location where we maintain all DBA Doctoral study

forms at <http://researchcenter.waldenu.edu/DBA-Doctoral-Study-Program.htm>

Prospectus / [Chair Request Form](#)

Also look at the list of available faculty – at the same site. If a faculty is grayed out – they are at load and unable to accept additional students.

Fill out the Prospectus / Chair Request form and send to DBAProspectusChairSelection dbaprospectuschairselection@waldenu.edu and Fred.Walker@waldenu.edu and see if Dr. House is still available now that the drop date has expired.

My best, Freda

From: Janet Harrison [<mailto:janet.harrison@waldenu.edu>]
Sent: Monday, September 01, 2014 8:54 PM
To: Freda Turner
Cc: James Savard
Subject: How to switch faculty chair

Hi Dr Turner. (Hi Dr Savard.)

I am not sure how to go about switching to a different chair for the completion of my DBA. Furthermore, I'm not even sure it is possible. But if it can be done I would like to start the process as quickly as possible.

When I was first assigned to Dr Savard I was elated because of the time he spent with me and the quality of his feedback. However, as I have progressed in this program I am becoming increasingly frustrated at my inability to move past the first hurdle. This is not Dr Savard's fault and I do not want either of you to misunderstand my request.

But I have changed the focus of my study several times simply because I cannot seem to get any definitive feedback on my work so far. Dr Savard told me about a year ago that he searched my research topic and found a bzillion hits (well, he didn't actually say bzillion, but you get the idea). Since then I have narrowed my topic twice and totally switched it once. I took a developmental editing class thru WU. I hired two different editors to help me, but when I show them my reviews from Dr Savard neither of them are able to figure out what he wants me to change. I ask for clarification and I get cut and pasted entries that I've already seen in previous versions of my work.

I have requested a quicker turnaround in reviewing my study, and received an answer that totally caught me off guard. He said that he would get to mine as soon as he read 4 other 150+ page studies. Again, these are not exact words but paraphrased as well as I can remember. This leads me to believe the he may be overworked. I can understand overworked as I have two full-time jobs, write and research my DBA, and have just now become the sole caretaker of my elderly mother who has recently been diagnosed with cancer. I, too, have a full plate.

All that said, Dr House was an special speaker at one of the residencies I attended earlier. I really enjoyed working with him in a class he taught. When I look at the list of available faculty chairs his name shows up. Do you think there is any way possible that I can switch my chair from Dr Savard to Dr House? If not, I completely understand. If so, please let me know what I need to do to get that started.

Thanks so much for your time in this matter.

Jan

EXHIBIT 41

----- Forwarded message -----

From: <tim.truitt@waldenu.edu>

Date: Fri, Sep 18, 2015 at 4:08 PM

Subject: DDBA-9000-75, Doctoral Study Completion. 2015 Fall Sem 08/31-12/20-PT2: The Role of the Mentor in the DBA Program It is always a great dilemma to determine when and how to provide guidance and suggestions for students. My philosophy is to never tell a student what to do or how to write something (and certainly not write material for them). Sometimes self discovery is in itself a wonderful learning pr

To:

The Role of the Mentor in the DBA Program

It is always a great dilemma to determine when and how to provide guidance and suggestions for students. My philosophy is to never tell a student what to do or how to write something (and certainly not write material for them).

Sometimes self discovery is in itself a wonderful learning process. And when all is said and done, it is the Learner that must stand on their own feet to defend their work and once they graduate, represent Walden and all those before them that have earned the DBA or PhD as a worthy scholar.

In the Walden DBA Program, case study research is becoming an increasingly prominent method for exploring business topics. I believe many Walden DBA students have somehow acquired misinformation that using quantitative research methods would expedite their research—and it is becoming very clear that this is not the case. In addition, the Methodologist Team has increased their scrutiny and requirements for the Phenomenological method for doc studies.

In general, the DBA Program is taking a more proactive role by encouraging students to do themselves a favor and go with a single or multiple case study methodology for their doc study work.

DrT

EXHIBIT 42

----- Forwarded message -----

From: **Janet Harrison** <janet.harrison@waldenu.edu>
Date: Thu, Feb 19, 2015 at 8:09 PM
Subject: Re: Please help!
To: "Doug G. Campbell" <douglas.campbell@waldenu.edu>

OK Dr Campbell. Thank you for your response.

Jan

On Thu, Feb 19, 2015 at 6:55 PM, Doug G. Campbell <douglas.campbell@waldenu.edu> wrote:

Hello Janet,

I am Dr. Douglas Campbell. I handle student and faculty issues for Dr. Turner. I am a senior DBA methodologist and I oversee all DDBA 9000 courses. After receiving your email I immediately investigated your situation. I have reviewed your courses, your current classroom and looked your work and the chair's feedback.

It is critically important that you understand that the acceptance into a doctoral degree program is an opportunity to earn a doctoral degree, it is not a guarantee of a doctoral degree. A doctoral study is the *student's* demonstration of their ability to be an *independent scholar*. That is a high and difficult standard to reach, which is why academic doctors are less than 3 percent of the population.

The doctoral study process is stressful and at times frustrating. It is something that all of our faculty have experienced. During this process students sometimes don't appreciate the inherent loneliness of the process, but after graduation and in retrospect the graduates appreciate their *independent achievement* and process they experienced. They then better understand the expectation others will have of them throughout their professional careers as an *independent scholar* able to conduct high quality research on their own.

Your doctoral study is solely your responsibility, not your chair or second committee member or the URR's responsibility. Your committee members are reviewers but they are not your personal editors. They identify problem areas and then the student refers back to their DBA doctoral study rubric and handbook and the wealth of other resources available to student. Your committee is not supposed to tell you how to fix it or what to write. Once a problem is identified the student must take the initiative to understand the issue and research how to correct the issue. This is the doctoral study process worldwide. This is what makes the doctoral degree level far different from an undergraduate or

graduate degree. You are responsible for editing your work and ensuring that it is structurally, theoretically and procedurally correct. Your committee is not responsible for teaching you everything you should know, instead you are responsible for doing the reading and obtaining the understanding necessary to achieve the high standards of our professional. This is part of the unique and difficulty challenge of being an *independent scholar*.

The Walden DBA program is one of the most successful of its type in in the world. Nationally the graduate rate in doctoral programs is a little more than 30 percent. The graduation rate for the Walden DBA program is about 72 percent. We graduate new DBAs all the time. They use the same tools and resources that you have available to you. The complete the same review process, often with the same faculty and methodologist that you have worked with. You should reflect on this.

In reviewing your course work and your chair's feedback the evidence indicates that you have been receiving the type of feedback that a doctoral student is supposed to receive. I don't think that changing chairs will help you. Therefore, all that I can recommend is that it might be in your best interest to email your adviser at somdocadvising@waldenu.edu and discuss the financial and money saving value of attending a residency Intensive. At an Intensive, our faculty/student ratio is 1:7 so we are able to focus on each student in an individual environment. In the past several residencies, students have left the Intensive with a great deal of their study mapping to the rubric and checked by the onsite APA editor. At an intensive, we bring an APA editor and DBA faculty and we work with attendees for 4 days in developing material that maps to the rubric. This allows students to finish earlier and have all their questions answered. The tuition pays for the hotel room, breakfast/lunch, Internet. In essence, you will only need to pay for your travel and dinner. The tuition covers the above expenses.

Intensive Residencies for 2015 are:

Mar 18-22 Dallas

May 27-31 Baltimore

Sep 30-Oct 4 Atlanta

Nov 11-15 Atlanta

Please contact your adviser soon as this is on a "first come, first served" basis and they can help you in obtaining a seat. I'm confident in your skills to be successful. Here is a brief video that might be of value: <http://www.waldenu.edu/about/multimedia/learning-experience/capstone/overview/capstone-intensive-retreats>

Respectfully,

Douglas G. Campbell, Ph.D.

DBA Faculty Methodologist - DBA Program

Walden University

School of Management

College of Management and Technology

Minneapolis, MN 55401

douglas.campbell@waldenu.edu

Cell / Office: [530-519-1695](tel:530-519-1695) Pacific Standard Time Zone

From: Janet Harrison [<mailto:janet.harrison@waldenu.edu>]

Sent: Wednesday, February 18, 2015 3:44 PM

To: Freda Turner

Subject: Re: Please help!

Hi again Dr. Turner. After sending my previous email, I think a more condensed version would sound less whiny. Maybe I should have simply asked the following question:

If a Walden U student has reworded and rearranged the same 10 - 12 sentences for 6 months how would you suggest that student engage the facilitator for assistance?

Dr. Truitt's answer to my pleas for help are that the doc study is mine, not his. His job is only to point me in the right direction to find answers.

Jan

On Wed, Feb 18, 2015 at 2:59 PM, Janet Harrison <janet.harrison@waldenu.edu> wrote:

Dear Dr. Turner,

I need your help.

When I started this program in October, 2008 it was brand new to Walden U. We had a different program director (Dr. Pickar) who told us we could be finished in the minimum time of 18 months. In reality I figured it would take me about 24 to 30 months to complete the program. I had practically flown thru my Master's degree in less than 2 years and, even though I was expecting a different level of difficulty, I fully expected to complete the program in a reasonable amount of time.

My first Committee Chair was Dr. Dani Babb. On 10/10/09 I wrote to tell you how excited I was to have her as my Committee Chair. You replied that she was a personal friend that had worked for you at other schools. After getting thru the first 2 parts of my writing (about 75 pages) I received an email from you (on 5/7/13) stating that I would have a new Committee Chair. Apparently, Dr. Babb, who was a great television talk-show host, but really did nothing to assist me in furthering my degree, had resigned to expand her business.

After that I was assigned to Dr. James Savard. I really liked Dr. Savard because of his enthusiasm. However, he was not impressed with the work I'd done with Dr. Babb. I scrapped that work and started on a different topic. By September, 2014, after a year of seeing him cut and paste the exact same review verbiage, I asked for a different Chair. For some reason I thought it was because Dr. Savard was new to facilitating this level that he didn't really have a good grasp on how to help students get traction in this program. I was hoping that with time, Dr. Savard would reach out to the Walden U students and earn those words of profound appreciation that I'd so often read in dissertations of other students' Committee Chairs.

Unfortunately, this never happened. So last September, I thought that another Committee Chair would be better for me. I wanted a seasoned facilitator who was not new to the task. I asked you and Fred to help me with this. Dr. Truitt was available and, once again, I was thrilled to be making a change. Dr. Truitt had an established class and one of his students was moving rapidly toward graduation.

I'm not going to expound on Dr. Truitt other than to say that when I've asked him for clarification on his comments, such as "the Problem Statement needs more work," he's offered no helpful feedback other than to refer me to the PowerPoint presentation he posted in class, and tell me that I need to sign up for an Intensive Residency. For the past 6 months, Dr. Turner, I've not moved past the P & P Statements. This is despite countless revisions on my part in an attempt to guess what it was that Dr. Truitt was looking for. I'm sure you can imagine how incredibly frustrating, and financially draining, this has become.

I have reviewed Dr. Truitt's recommended PPTs, watched the YouTube videos he's pointed me to, and reworded these sentences so many times that I don't think there is another way to say the words that I've not already said. I have humbly asked him for specific assistance or direction on how he would like to see the P & P statements revised, and have gotten nowhere. Dr. Turner, I have been in academically rigorous programs before and have *never* had trouble with performance. *Ever*.

I am reaching out to you at this time because I sincerely need your help. I am under no delusions about the intensity of doctoral study. I never expected this to be an easy process, and I have changed direction as necessary *many* times during my work at Walden. I am now past the point of no return -- *I must*

finish this program. But I am simply at a loss at this point, because no matter what I do, I keep hitting a brick wall.

Please advise on what my next steps should be. Your recommendations are greatly appreciated.

Sincerely,

Janet

EXHIBIT 43

----- Forwarded message -----

From: "Deltamudelta" <deltamudelta@waldenu.edu>

Date: Nov 17, 2016 11:31 AM

Subject: Congratulations - Invitation to Join Delta Mu Delta @ Walden University

To: "Deltamudelta" <deltamudelta@waldenu.edu>

Cc: "Freda Turner" <freda.turner@waldenu.edu>

November 17, 2016

Dear Walden Student:

Congratulations!

Due to your current academic standing in Walden's School of Management, you have been selected by Academic Affairs to become a member of the **Walden University Nu Rho Chapter** of the International Business Honor Society, **Delta Mu Delta** (DMD). This invitation is extended only to Walden University business students who have completed 75% of courses, are in the top 20% of their respective coursework, and have a minimum GPA of 3.75 as of the last semester.

The one-time fee for lifetime DMD membership is \$50.00 USD (plus shipping & handling), which includes your certificate of enrollment, a gold DMD pin, and a one year subscription to *Bloomberg Businessweek*. You can also buy graduation regalia to wear to Walden University's commencement ceremony!

Benefits of membership include: Lifetime Recognition for Outstanding Academic Achievement, Networking Opportunities, Scholarship Program, Acknowledgment for Federal Employment, and Lifetime Contact through the newsletter. Visit <http://deltamudelta.org/benefits/> for additional details.

For more information regarding the Delta Mu Delta Honor Society, visit <http://deltamudelta.org/about/>

I speak for the entire chapter when I say that we hope you will accept this invitation to membership. Your Delta Mu Delta membership will convey academic excellence and a commitment to high principles and superior achievement throughout your lifetime. Truly, your $\Delta M \Delta$ designation will set you apart from the crowd.

Again, congratulations on your achievement. We look forward to welcoming you into the Nu Rho Chapter!

Important!

Your online DMD Chapter **Campus Name** is **Walden University** and your **Invite ID** is **your Walden University e-mail address**.

Click here to enter the Delta Mu Delta virtual member site: [Online Membership Application](http://deltamudelta.org/invite_apply/) or paste this link in your browser: http://deltamudelta.org/invite_apply/

The current invitation is valid through **12/30/2016**. After this date, your invitation will not longer be valid.

If you have any questions, please respond to this e-mail.

EXHIBIT 44

----- Forwarded message -----

From: **Nancy Rea** <Nancy.Rea@waldenu.edu>
Date: Sun, Jul 20, 2014 at 10:42 PM
Subject: RE:Prospectus review.
To: Kelly Gardiner <kelly.gardiner@waldenu.edu>

Dear Kelly,

It is good to hear from you and understand your concerns. Dr. Pete Anderson is my designee to review and provide constructive critique. It is our responsibility that your work is more than a descriptive study and want to assist you. Your work needs to show the use of inferential statistics and doing a descriptive study is not enough. Using inferential statistics needs to be built into the research questions and hypotheses. You will need to work with your chair and member to assure that our work meets the rigor and level of statistical analysis of a PhD level study. Your Hypothesis are only using a descriptive analysis and you really need to do more.

Specifically as stated in the critique, "These RQs are not sufficient for a dissertation at Walden. You need to test the relationships between at least 2 variables - what you have here is a simple description of care provided. Please discuss this with your chair and revise your RQs and HYs"

Your chair and you can reach out to Dr. Anderson at peter.anderson@waldenu.edu if you need help. I do understand this is not what you want to hear after working on this prospectus for several quarters and there work here that really is very good. We just need you to go the next step and add the 'relationship between at least 2 variables and the outcome variable in your study and work this into the hypotheses. Your study also needs to be grounded in the literature and to fill a gap.

I am attaching the review which was posted in the MyDR system by me along with Dr. Anderson's notes and you should have been sent a notice via email letting you know. However when reviews are sent back, research needs to reset the system. Then when ready you can resubmit your prospectus for our review.

Please feel free to have your chair work with Dr. Anderson to determine the best solution for your prospectus. We are hoping you are able to turn this around quickly and thank you for your understanding.

Nancy K. Rea, PhD, MHSA, CPH
Program Director for DrPH and PhD in Public Health Programs
School of Health Sciences
Walden University
100 Washington Ave South, Suite 900
Minneapolis, MN 55401
Email: Nancy.Rea@waldenu.edu

www.waldenu.edu

A higher degree. A higher purpose.

From: Kelly Gardiner [mailto:kelly.gardiner@waldenu.edu]

Sent: Sunday, July 20, 2014 6:31 PM

To: Nancy Rea

Cc: Kelly Gardiner

Subject:

My name is Kelly Gardiner and I am writing to find out whether or not a man named Pete (assigned by the Dean's office as an addition to my committee) is still in my Taskmaster. At first he did not approve my prospectus and then I got a letter stating that I was approved and could move on to my proposal. When I tried to find his comment, all evidence of him vanished.

I need urgent clarification of this issue. Last week I had the computer team look for me and they said that there were no comments from anyone named Pete and only Dr. Francavillo and Dr. Williams were on there and they both had approved my prospectus-- which is why I turned it in.

Imagine my shock when both my committee members approved my prospectus after 4 semesters only to have Pete tell me that it was not PhD level work.

This is why I need to make sure that everything is ok before I move on to the proposal phase. I do not want anymore surprises. Today, when I looked on taskmaster, it looks like I need a revision still but I cannot find the comments from Pete on there.

Please get back to me within the next 7 days. Thank you.

Kelly Gardiner

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

Jennifer Wright, Kelli Callahan, Janet Harrison, Pete Holubz and Kelly Gardner

(b) County of Residence of First Listed Plaintiff **San Bernardino, CA**
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

See attached.

DEFENDANTS

Walden University, LLC and Laureate International Universities
D/B/A Laureate Education Inc.

County of Residence of First Listed Defendant **Hennepin County, MN**
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF
THE TRACT OF LAND INVOLVED.

Attorneys (If Known)
Unknown

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
- ☐ 2 U.S. Government Defendant
- ☐ 3 Federal Question
(U.S. Government Not a Party)
- ☒ 4 Diversity
(Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | PTF | DEF | | PTF | DEF |
|---|---------------------------------------|----------------------------|---|----------------------------|---------------------------------------|
| Citizen of This State | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input type="checkbox"/> 4 | <input checked="" type="checkbox"/> 4 |
| Citizen of Another State | <input checked="" type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: [Nature of Suit Code Descriptions.](#)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input checked="" type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	PERSONAL INJURY <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY	CIVIL RIGHTS	PRISONER PETITIONS			
<input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty Other: <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding
- ☐ 2 Removed from State Court
- ☐ 3 Remanded from Appellate Court
- ☐ 4 Reinstated or Reopened
- ☐ 5 Transferred from Another District (specify)
- ☐ 6 Multidistrict Litigation - Transfer
- ☐ 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
28 U.S.C. § 1332(d)(2)

Brief description of cause:
Common law claims and violations of multiple state consumer protection statutes related to education services

VII. REQUESTED IN COMPLAINT:

☒ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$
\$5,000,000 +

CHECK YES only if demanded in complaint:
JURY DEMAND: ☒ Yes ☐ No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

DATE

12/01/2016

SIGNATURE OF ATTORNEY OF RECORD

s/Garrett D. Blanchfield

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE

Print

Save As...

Reset

INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44

Authority For Civil Cover Sheet

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

- I.(a) Plaintiffs-Defendants.** Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.
- (b) County of Residence.** For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.)
- (c) Attorneys.** Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".
- II. Jurisdiction.** The basis of jurisdiction is set forth under Rule 8(a), F.R.Cv.P., which requires that jurisdictions be shown in pleadings. Place an "X" in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.
 United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here.
 United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an "X" in this box.
 Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked.
 Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; **NOTE: federal question actions take precedence over diversity cases.**)
- III. Residence (citizenship) of Principal Parties.** This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.
- IV. Nature of Suit.** Place an "X" in the appropriate box. If there are multiple nature of suit codes associated with the case, pick the nature of suit code that is most applicable. Click here for: [Nature of Suit Code Descriptions](#).
- V. Origin.** Place an "X" in one of the seven boxes.
 Original Proceedings. (1) Cases which originate in the United States district courts.
 Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441. When the petition for removal is granted, check this box.
 Remanded from Appellate Court. (3) Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.
 Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.
 Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.
 Multidistrict Litigation – Transfer. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407.
 Multidistrict Litigation – Direct File. (8) Check this box when a multidistrict case is filed in the same district as the Master MDL docket.
PLEASE NOTE THAT THERE IS NOT AN ORIGIN CODE 7. Origin Code 7 was used for historical records and is no longer relevant due to changes in statute.
- VI. Cause of Action.** Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.** Example: U.S. Civil Statute: 47 USC 553 Brief Description: Unauthorized reception of cable service
- VII. Requested in Complaint.** Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P.
 Demand. In this space enter the actual dollar amount being demanded or indicate other demand, such as a preliminary injunction.
 Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.
- VIII. Related Cases.** This section of the JS 44 is used to reference related pending cases, if any. If there are related pending cases, insert the docket numbers and the corresponding judge names for such cases.

Date and Attorney Signature. Date and sign the civil cover sheet.

ClassAction.org

This complaint is part of ClassAction.org's searchable class action lawsuit database and can be found in this post: [Walden University, Laureate Education Inc. Hit with Fraud Suit](#)
