



March 25, 2019

The Honorable Betsy DeVos
Secretary of Education
Department of Education
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Dear Secretary DeVos and Dr. Evans:

We are writing to you out of concern for the 8,800 students affected by the recent closure of Argosy University institutions. We also write in order to outline our concerns and confusion, and ask for your rationale and clarification, as to why neither of your organizations sounded alarm bells sooner.

As you know, ten Argosy psychology programs accredited by APA closed abruptly on Friday, March 8, 2019, amidst significant disarray and distress. For months, students with federal loans had not received their living stipends, as Argosy withheld nearly \$13MM earmarked for student expenses and funneled that money into its own operating budget. Despite your efforts to create transfer and teach-out opportunities for students and faculties, many students – some just a few months from graduating, working at internship sites providing psychotherapy and no longer even on campus – have not been provided pathways to complete their degrees. Nor are the options offered thus far to students in more recent cohorts workable for all of those affected. Many students have been left high and dry, saddled with debt, and facing the option of taking on more debt to re-take courses at new schools to complete their degrees.

We understand that the Department of Education is offering students online information and a hotline to call, and that the APA has taken a multitude of stopgap measures and crisis interventions to reassure students that the professional organization overseeing their education will provide for them ([APA press releases](#)). Most recently, APA is

encouraging accredited psychology programs to accept Argosy students as transfer students and supports changes in requirements in order to do so, and is offering the possibility of temporary teach-out accreditation provided by non-accredited programs. These efforts are commendable, and in some ways even more laudable, given the APA's history of disregard for other disenfranchised students, such as those who found themselves, through no fault of their own, midway through their studies when their programs lost accreditation.

Despite helpful and creative quick-thinking by accreditors, administrators and recipient schools, however, these steps are not enough. We believe more needs to be done, particularly because of the roles of the DoE and the APA in contributing to this crisis in the first place. The DoE approved the sale of Argosy and other schools from Education Management to Dream Center, a Christian nonprofit organization affiliated with an evangelical denomination with no experience in higher education and no apparent investment in educational policy whatsoever. It is inconceivable that the DoE would approve this sale to such an unqualified buyer.

At the time of the sale, the DoE knew that the schools were already in a precarious situation, one that would require deft intervention and oversight to reverse. EDMC's misleading and aggressive recruiting tactics and misrepresentation of employment prospects, amounting to consumer fraud, resulted in a \$200MM fine for EDMC in a settlement in 2015 ([NYT article, 11.17.2015](#)). When Dream Center took over the schools in 2017, these programs were already on life support. At that point, it should have been no surprise that the schools were destined to fail.

Whether these schools are termed for-profit or non-profit for tax purposes, the profit motive is clear throughout the involvement of EDMC and Dream Center. Both entities hoped to use federal loan money and school profits to fund their own pocketbooks and evangelical activities, respectively. Now students are left paying the price for this greed and incompetence.

Despite these egregious actions by EDMC and the depth of concerns about Dream Center, the APA maintained its accreditation of the Argosy psychology program throughout. As best we can determine, APA did not review accreditation status or investigate when the EDMC whistleblower lawsuit was undertaken. Similarly, we are not aware of APA's protesting the Dream Center purchase from the start. Recent actions undertaken by the APA would seem to supply a clue to this silence:

In order to provide context, we need to turn to APA's nomination of Clark Campbell, PhD, senior associate provost at Biola University, to a DoE rulemaking panel ([APA nominations to rule-making panel](#)). This move was protested vehemently by psychologists around the country, and documented in a letter to the APA on November 14, 2018, with signatories including but not limited to APA Division 44, Asian American Psychological Association (AAPA), Division 17 (Society of Counseling Psychology), Division 17 (Society of Counseling Psychology) Section on LGBT issues (SLGBTi), Division 35 (Society for the Psychology of Women), Division 51 (Society for the Psychology of Men & Masculinities), Division 39 (Psychoanalysis) and National Latinx Psychological Association (NLPA)/Orgullo Latinx. The letter requested that APA rescind the nomination and stated that Dr. Campbell's nomination was "unacceptable because of

multiple concerns related to Biola University's policies toward the LGBTQ community, restrictions on its employees' ability to support LGBTQ equity, and its efforts to undermine the autonomy of accreditors... This nominee has the potential to exert significant influence on upcoming federal rules that will be released by the DOE, under the leadership of Secretary DeVos and President Trump, which we strongly believe are intended to weaken civil rights protections for marginalized groups of students, faculty, and staff who attend religious colleges and universities, especially those who are LGBTQ."

Why might the APA concurrently have recommended such an inappropriate candidate to a position of significant influence and approved such an inappropriate steward of a professional training program of national reach? Our concern is that these two simultaneous actions represent two aspects of an effort to curry favor with a federal educational administration that has embraced moving our educational system in a direction weighted towards increased evangelical influence. While we agree that the APA should be invested in maintaining the respect of the Department of Education and in embodying its highest ideals, we find it wholly unacceptable for the premier professional organization for psychologists to collude, no matter how subtly, with this administrative agenda. We do not know why APA failed to protest the Dream Center purchase, continued to maintain its accreditation of Argosy, or why it nominated a Biola provost, but these actions show a support for evangelical entities that are known to be favored by DeVos. It would be helpful for APA to explain its stance on these issues in detail.

Meanwhile, APA is an organization that both represents the profession of psychology and also accredits the programs that train students for that profession, a fact that complicates both its allegiances and its capacity to maintain its focus exclusively on the well-being of students in a time of need. The interface between these dual roles is murky enough under ordinary circumstances, but the difficulties and complications that confront us in the Argosy debacle highlight the fact that psychology and those it serves deserve to have an independent accrediting body, as many other professions do, overseeing its educational mission.

Of the government, we ask the following:

- Provide immediate funds for students whose own financial resources were misappropriated by Argosy
- Grant students loan forgiveness for this semester, and demand that recipient schools and teach-out programs waive any charges or fees to transfer
- Forgive loans for students who matriculated after Dream Center took ownership

Of the APA, we ask the following:

- Ensure that each Argosy student and faculty member be presented with transfer or teach-out options in so timely a fashion that graduation and other deadlines require no substantial modification
- Provide best assurances possible that students' coursework will transfer fully
- Publish an explanation of its interactions with and accreditation of Argosy schools, with focus on why it maintained the accreditation and did not, to our knowledge, publicly protest or materially respond to the Dream Center purchase

- Initiate a task force, with broad representation of key entities, to research and publish a white paper on the pros/cons of an independent accrediting body in the field of psychology

While this massive failure to protect our students and the profession is sorted out, our greatest focus of concern is for the students who have been victimized and, essentially, defrauded. Their situation deserves immediate remedy. But following what we hope will be a swift resolution of this crisis, our hope is that these systemic failures will be addressed such that educational institutions can function solely as providers of optimal education, beyond the reach of guild interests, profit motives and special interests.

We look forward to receiving a response from each of you to our letter, and welcome the opportunity to discuss these concerns further.

Sincerely,

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PsiAN is a global network of mental health professionals and stakeholders dedicated to transforming our mental health system by promoting the value of therapies of insight, depth and relationship.

Together with our Strategic Partners, we work to educate and advocate with legislators and policy-makers, fellow professionals and the public to assure the availability of optimal mental health treatments for those who need it most.