

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TENNESSEE  
NORTHERN DIVISION**

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	CIVIL ACTION NO. 3:25-cv-26
	)	
v.	)	
	)	
SOUTHEAST BANK,	)	
	)	
Defendant.	)	

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**COMPLAINT**

**INTRODUCTION**

1. The United States of America brings this action against SouthEast Bank (“the Bank” or “SouthEast”) for discriminating against Black and American Indian/Alaska Native (“AI/AN”) post-secondary education graduates in its student refinance loan product lending across the United States.

2. This action to enforce provisions of the Equal Credit Opportunity Act (“ECOA”), 15 U.S.C. §§ 1691-1691f, and its implementing regulation, Regulation B, 12 C.F.R. Part 1002, seeks to redress the discrimination based on race that SouthEast engaged in through Education Loan Finance, an online student loan consolidation and refinance program designed “to provide low-cost student loan refinancing options” across the United States (the “ELFI Refinance Program”).

3. Since its launch in December 2015, the ELFI Refinance Program has required applicants to graduate from an “eligible school” to qualify for an ELFI Refinance Program loan.

4. Up until April 5, 2021, SouthEast defined an eligible school, in part, as one that fell below the Cohort Default Rate (“CDR”) threshold that SouthEast management periodically

established based on annual, national CDR averages. The CDR is a number calculated by the United States Department of Education for institutions of higher education that represents the percentage of that institution's students who default on certain federal student loans within three years of starting repayment. Under this "CDR Policy," SouthEast automatically denied graduates of schools with CDRs above its established thresholds.

5. SouthEast's CDR Policy disproportionately excluded Black and AI/AN degree recipients as compared to similarly situated graduates of other demographic groups. For example, under the CDR Policy, Black bachelor's degree recipients were as much as 4.31 times more likely to be excluded than bachelor's degree recipients who were not Black. AI/AN Bachelor's degree recipients were as much as 2.98 times more likely to be excluded than comparable degree recipients who were not AI/AN. In contrast, and with limited exception, bachelor's degree recipients of other races and national origins were more likely to be included than excluded under the CDR Policy.

6. SouthEast's CDR Policy disproportionately excluded majority-Black post-secondary institutions, including Historically Black Colleges and Universities ("HBCUs"). For example, SouthEast's CDR Policy excluded as many as 84.4 percent of majority-Black schools. In contrast, it excluded no more than 21.14 percent of non-majority Black schools.

7. When SouthEast's CDR Policy operated to deny credit to graduates, SouthEast failed to provide those applicants with proper notification of their denial.

8. SouthEast lacked a legitimate, non-discriminatory reason for its CDR Policy. Denials based on CDR were not based on individual creditworthiness or justified by secondary market pressures. Even if SouthEast's policy was based on a legitimate reason, less-discriminatory alternatives to the CDR Policy existed.

9. SouthEast's CDR Policy and its failure to notify applicants of their denials caused Black and AI/AN graduates significant economic and other harm.

10. The United States brings this lawsuit to hold SouthEast accountable for its serious violations of law and to remedy the substantial and widespread harmful consequences of its discriminatory lending policies and practices.

### **JURISDICTION AND VENUE**

11. This Court has subject-matter jurisdiction over this action under 28 U.S.C. §§ 1331 and 1345 and 15 U.S.C. § 1691e(h).

12. Venue is proper in this Court under 28 U.S.C. § 1391 because SouthEast conducts business, and its principal place of business is located, in this District.

### **PARTIES**

13. The United States is authorized to initiate a civil action in federal district court whenever a matter is referred to the Attorney General under 15 U.S.C. § 1691e(g) or when the Attorney General has reason to believe that a pattern or practice in violation of ECOA has occurred. 15 U.S.C. § 1691e(h).

14. Defendant SouthEast Bank is a state-chartered, community bank formed in February 2013 with a principal place of business located at 12700 Kingston Pike in Farragut, Tennessee. The Bank is chartered by the State of Tennessee and supervised by the Federal Deposit Insurance Corporation ("FDIC"). It is a wholly owned subsidiary of SouthEast Bancorp, Inc.

15. SouthEast shares responsibilities related to the ELFI Refinance Program with Education Loan Finance, Inc. ("ELFI, Inc."), a not-for-profit holding company and the parent company of SouthEast Bancorp, Inc.

16. SouthEast originates all loans for the ELFI Refinance Program using a loan

origination system (“LOS”) launched in April 2017 by ELFI, Inc. The ELFI Refinance Program’s LOS is a platform used in underwriting where users create a profile and complete their refinancing or student loan application. According to SouthEast, the LOS “allows ELFI, Inc. to prequalify applicants and provides a highly automated underwriting engine and user-friendly application process.”

17. As of April 30, 2024, SouthEast Bank funded over \$2.96 billion in ELFI loans to more than 25,000 borrowers in Washington, D.C. and every state and territory of the United States.

18. SouthEast also sells consolidated loans to investors on the secondary market (“securitizations”). In these securitizations SouthEast serves as “The Originating Lender” and ELFI, Inc. is the “Sponsor” and “Administrator” that purchases loans from SouthEast before financing them through subsidiaries on the secondary market.

19. Between 2018 and 2022, SouthEast completed at least four ELFI Refinance Program securitizations valued at over \$1.14 billion, including a \$316.23 million sale in 2022. SouthEast has completed additional securitizations since 2022. In June 2024, for example, its securitization with \$270.35 million in loans received the highest credit rating agency rating.

20. SouthEast is a “creditor” within the meaning of ECOA, 15 U.S.C. § 1691a(e), and Regulation B, 12 C.F.R. § 1002.2(l).

## **FACTUAL ALLEGATIONS**

### **Background**

21. The FDIC referred the matter to the Department of Justice on May 24, 2021, under ECOA, 15 U.S.C. § 1691e(g).

22. The FDIC based its referral, in part, on its finding that under the CDR Policy,

graduates from less than 15 percent of HBCUs could apply for an ELFI Refinance Program loan, regardless of those graduates' individual creditworthiness. By contrast, the FDIC found that graduates of almost 80 percent of non-HBCUs could apply for an ELFI Refinance Program loan.

23. Title IV of the Higher Education Act of 1965 ("Title IV"), which established federal loan and grant programs that the Department of Education administers, requires the Department of Education to annually publish the CDR for all institutions of higher education within each State. *See* 20 U.S.C. § 1080(e)(1).

24. CDR is, for schools with 30 or more borrowers, the percentage of a school's borrowers who enter repayment on loans from the William D. Ford Federal Direct Loan Program ("Direct loans"), or its precursor, the Federal Family Education Loan Program ("FFELP loans"), during a particular federal fiscal year and default (i.e., are more than 360 days delinquent) or meet the other specified conditions in a three-year period. For example, 2019 CDRs, published in 2022, reflect borrowers who entered repayment at each institution of higher education in 2019 and defaulted in 2019, 2020, or 2021, divided by the institution's borrowers entering repayment in 2019.

25. CDR calculations do not include all federal student loans, such as certain loans available only to students pursuing advanced degrees (i.e., master's and doctorate degrees).

26. Higher CDRs are typically driven by students that do not receive degrees.

27. The Department of Education uses CDR to determine aid eligibility under Title IV. The Department of Education deems schools with three consecutive CDRs above 30 percent or a single CDR above 40 percent as Title IV ineligible and, therefore, the students who attend those schools are ineligible for Federal Direct Loans or Federal Pell Grants. Schools may appeal

and avoid ineligibility for a variety of reasons, including by demonstrating that they educate high numbers of low-income students and have high placement or completion rates.

28. For over a decade, lenders have known or should have known that using the school an applicant attended in establishing loan eligibility, including CDR, may contribute to discriminatory outcomes for students of color.

29. In 2012, the Consumer Financial Protection Bureau (“CFPB”), directed by Congress, issued a public report (“1077 Report”) on private education loans that specifically criticized using CDR in lending because of its potential to disparately impact students of color. The 1077 Report cautioned that “student lenders’ use of CDR at very low default levels may present fair lending concerns because . . . racial and ethnic minority students are disproportionately concentrated in schools with higher CDRs[,]” and using CDR for “loan eligibility, underwriting, and pricing may have a disparate impact on minority students by reducing their access to credit[.]” Specifically, Black and Hispanic students were “almost twice as likely as students generally to attend schools with” CDRs above cutoffs of 8 and 12 percent.

30. The 1077 Report emphasized that, while CDR “may be correlated with the value of a degree from a particular school,” it “was not specifically intended to assist private lenders in eligibility, underwriting, and pricing decisions, particularly at much lower” default levels. Thus, “general reliance on CDR to set [loan] eligibility cutoffs . . . may raise a threshold fair lending concern, requiring further analysis by lenders to” show a valid need to use CDR.

31. In July 2020, several United States Senators issued a report (“2020 Senate Report”) on the use of non-individualized education-related data in credit assessment by six major financial services providers. The 2020 Senate Report warned that using “the school an applicant attended to determine creditworthiness” may violate ECOA and Regulation B.

32. These risks were noted by the student lending community. For example, in 2017 the law firm Ballard Spahr LLP commented in its public-facing “Consumer Finance Monitor” that a lender’s underwriting process that “uses the identity of the college attended by the applicant” was “very strange and in tension with the CFPB’s repeated attacks on the use of [CDR] and other school-specific variables in student loan underwriting.”

33. Thus, SouthEast knew or should have known about fair lending risks associated with using CDR to determine loan eligibility.

#### **SouthEast’s Use of CDR for Student Loan Eligibility**

34. The ELFI Refinance Program employs eligibility requirements related to applicants’ educational background. Applicants must have graduated from an “eligible school” to obtain an ELFI Refinance Program loan. From December 2015 until April 5, 2021, SouthEast’s credit risk policy defined an “eligible school” as one that met the following criteria (“School Eligibility Criteria”):

- is Title IV eligible at the time of final approval;
- is a non-profit institution;
- offers bachelor’s, master’s and/or doctorate degrees; and
- “meets the threshold that management periodically establishes for the 3-year Cohort Default Rate (CDR)[,] as published by the Department of Education.”

35. The ELFI Refinance Program’s CDR “threshold” was the national average CDR for all institutions for a given year (referred herein as the “CDR Policy”).

36. SouthEast did not factor CDR into loan pricing or consider CDR in relationship to its other underwriting criteria, including credit score or income requirements. Rather, if an applicant’s alma mater had a CDR that exceeded the national average, SouthEast did not allow

the person to continue the application and refused to further assess their creditworthiness.<sup>1</sup>

37. SouthEast did not separately evaluate undergraduate degree recipients from advanced degree recipients. SouthEast applied the CDR Policy to all applicants irrespective of whether they held bachelor's, master's, or doctorate degrees, notwithstanding the decline in the student loan default rate as students obtain higher degrees.

38. The CDR Policy automatically denied all graduates of schools with CDRs above the national average.

39. SouthEast's CDR Policy denied individuals based on their school's CDR at the time of application. It did not seek to evaluate applicants based on the school CDR associated with their time of graduation.

40. Table 1 lists the ELFI Refinance Program's CDR Policy thresholds and the period each threshold was in place:

<i>3-year CDR</i>	<i>CDR Threshold</i>	<i>Dates Used for the CDR Policy</i>
2017	9.7	10/13/2020 - 04/05/2021
2016	10.1	02/14/2020 - 10/12/2020
2015	10.8	09/26/2018 - 02/13/2020
2014	11.5	10/16/2017 - 09/25/2018
2013	11.3	12/02/2016 - 10/15/2017
2012	11.8	07/20/2016 - 12/01/2016
2011	11.7	12/01/2015 - 07/19/2016

41. Graduates of 1,427 schools could apply under every CDR Policy threshold used between April 2017—when SouthEast first implemented its LOS—through April 5, 2021 (“the LOS period”). Of the 1,427 schools, only seven were majority-Black, defined as those schools

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<sup>1</sup> If an applicant attended multiple schools and only some were eligible under the CDR Policy, the applicant could move forward based on the school(s) that met SouthEast's School Eligibility Criteria.



matriculating more than 50 percent Black students in every school year ending in 2015 through 2020. Those schools meeting the School Eligibility Criteria under each CDR Policy threshold used in the LOS period are listed in Exhibit 1.

42. SouthEast's decision to tie its CDR Policy to application date rather than graduation date meant certain graduates could apply in some years and not others. Graduates of 391 schools, including 39 majority-Black schools, were considered ineligible some years during the LOS period but not others. Those schools eligible in some years but not others during the LOS period are listed in Exhibit 2.

43. For example, a 2016 graduate with a high credit score from Tuskegee University, an HBCU in Alabama, was eligible to apply only from October 2017 through September 2018. SouthEast would automatically reject that person if they applied in 2016, most of 2017, or October 2018 through April 2021.

44. Graduates of 259 Title IV eligible, non-profit institutions offering bachelor's, master's, and doctorate degrees (SouthEast's "non-CDR School Eligibility Criteria") with a CDR above the threshold ("CDR Ineligible School") were denied access to an ELFI Refinance Program Loan during the entire relevant period due to the CDR Policy. Of these 259 institutions, 63 were majority-Black schools. For example, SouthEast did not include Morehouse College, an HBCU in Georgia, or the University of the District of Columbia, an HBCU in Washington, D.C., on its roster of eligible schools in any year during the LOS period. Schools that met the non-School Eligibility Criteria every year during the LOS period that were always excluded by the CDR Policy are listed in Exhibit 3.

45. As described in more detail in Paragraphs 67 through 75, SouthEast's CDR Ineligible Schools graduated higher rates of Black and AI/AN individuals than SouthEast's

eligible schools.

46. SouthEast applied the CDR Policy to all graduates irrespective of their race or national origin.

47. The CDR Policy is a uniform standard of denying credit applications and an “aspect of a credit transaction,” as that term is understood under ECOA. *See* 15 U.S.C. § 1691(a); *see also* 12 C.F.R. § 1002.2(m). It is a bright-line determination that demarcates who is barred from obtaining a loan based on whether their school’s CDR is above or below that year’s average.

48. SouthEast posted its list of eligible schools on its website for potential applicants. As described in Paragraphs 42 and 44, many majority-Black schools were not included on this list.

49. In addition to listing eligible schools on its website, SouthEast relied on its customer base to generate more business. For example, SouthEast provided referral bonuses to existing customers who referred friends, family members, and fellow graduates to their loan programs. Additionally, SouthEast used social media “lookalike” advertising that targeted advertisements at prospective applicants who shared similar characteristics with their existing customers.

50. Graduates of CDR Ineligible Schools were discouraged from applying for ELFI Refinance Program loans because their schools were not listed on SouthEast’s website as an “eligible school.” As described in more detail in the following paragraphs, those individuals have suffered injury and damages because of SouthEast’s conduct, making them aggrieved within the meaning of ECOA, 15 U.S.C. § 1691e.

### **SouthEast’s Application Process**

51. SouthEast required that all applicants take certain affirmative steps to access the ELFI Refinance Program. The ELFI Refinance Program application process begins with the applicant entering basic information on the ELFI website through SouthEast’s LOS. To apply

and obtain a pre-verified decision to refinance or consolidate their student loans, SouthEast required each person to first:

- a. Sign up on the ELFI website with a username and passcode;
- b. Verify an email address by entering a code that the LOS sent to their email; and
- c. Fill out required fields, including by selecting from a drop-down list of schools.

52. Once applicants filled in the required fields, they could select a “Get My Rate” button that, after a soft credit pull, provided them preliminary credit decisions within 30 seconds, subject to their submitting verification information.

53. Applicants could not manually enter schools omitted from the prepopulated, drop-down list. This drop-down list excluded schools ineligible under the School Eligibility Criteria, including those that failed to meet ELFI’s then current CDR Policy threshold. If a school was not chosen from the list at the time a person tried to select “Get My Rate,” the system would display the following message to the applicant: “Please select a school from the list.”

54. A 2018 graduate of Morehouse College with a 790-credit score applying for a loan in March 2020 would not have found his school on the ELFI Refinance Program website’s drop-down list. Nor would a 2020 law degree recipient from the University of the District of Columbia with an exemplary credit score and high income.

55. SouthEast’s LOS did not allow graduates of CDR Ineligible Schools to move forward with their application by accurately representing their alma mater. If any of the fields were not populated or had improper information, the system prompted the consumer with an applicable message and did not allow them to proceed through the “Get My Rates” page.

56. While the CDR Policy was in effect, more than 44,000 individuals created an account and verified their email address through the ELFI Refinance Program’s website but did

not proceed through the “Get My Rate” stage. Approximately a quarter of all individuals who created an account through the ELFI Refinance Program website fit into this category.

57. At least a few individuals from CDR Ineligible Schools reached out to SouthEast but could not progress with their application. And likely more than a few of the more than 44,000 persons who created an account and verified their email address would have met SouthEast’s non-CDR School Eligibility Criteria had they not graduated from a CDR Ineligible School.

58. Those individuals meeting the non-CDR School Eligibility Criteria that graduated from CDR Ineligible Schools and created an account or otherwise reached out to SouthEast to apply through the ELFI Refinance Program have suffered injury and damages because of SouthEast’s conduct, making them aggrieved applicants within the meaning of ECOA, 15 U.S.C. § 1691e.

59. As a result of this CDR Policy, applicants from CDR Ineligible Schools were denied a student refinance loan before they even completed the application.

60. SouthEast denied student refinance loans at the “Get My Rate” stage for other reasons. For example, just as it required applicants to select their school of graduation, SouthEast’s application process requires applicants to select their citizenship status and degree type from drop-down lists with limited options matching eligibility criteria. If a degree type is left blank (i.e. because the applicant does not have at least a bachelor’s degree), or if “U.S. Citizen” or “Permanent Resident” is not selected, at the time the customer tries to advance to the “Get my Rates” page, the system displays an error message to the applicant that the missing field “is required.”

61. SouthEast did not provide applicants unable to proceed through the “Get My Rate” stage with a notification that disclosed the reason(s) for their rejection that relate to and describe

the factors actually considered by SouthEast. Instead, SouthEast evaluated information about the consumer (for example, that an eligible school was not selected), declined the consumer credit based on that information, and communicated this to the consumer with an error message noting that the consumer failed to enter the name of an eligible school or otherwise failed to provide information demonstrating eligibility.

62. For those who attended institutions meeting the School Eligibility Criteria and otherwise advanced through the “Get My Rates” page, the ELFI Refinance Program LOS performed a soft credit pull and “prequalification review.” This review immediately rejected applicants who did not meet ELFI’s “hard knock-out” rules,<sup>2</sup> had credit scores below 680, or lacked an eligible degree (i.e. at least a bachelor’s degree) from an eligible school, among other qualifications.<sup>3</sup>

63. SouthEast applied the CDR Policy to all graduates under the ELFI Refinance Program irrespective of their race up through April 5, 2021, after which date it discontinued the CDR Policy without replacement.

64. The Bank’s In-School loan program, an ELFI product begun in a limited scale in April 2019 and expanded into a national program in June 2021, has not used CDR in underwriting.

65. Other actors in the student loan refinance market do not use CDR cutoffs to reject applicants.

66. After SouthEast eliminated its CDR Policy, more than 690 individuals from schools

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<sup>2</sup> Hard knock-outs include factors typically seen on a credit report, such as an unpaid negative public record in the past seven years, a record of default or delinquency of 60 days past due or more on any student loan within the past 24 months, or less than 36 months of credit history.

<sup>3</sup> Other qualifications include, for example, that applicants have an income of at least \$35,000.

that would have likely been CDR Ineligible Schools under the last used CDR Policy threshold submitted applications seeking more than \$42 million in student loans through SouthEast's LOS. These individuals include over 230 advanced degree and 460 undergraduate degree recipients. At least those, and likely many more such individuals, first created accounts through the ELFI Refinance Program website and selected "Get My Rate." These 690 individuals would likely have been automatically denied credit at the "Get My Rate" stage if SouthEast's last CDR Policy threshold was still in effect.

### **Racial Disparities under SouthEast's CDR Policy**

67. According to the National Center for Education Statistics ("NCES") during 2019-2020, 61 percent of students earning bachelor's degrees graduated with student loan debt.<sup>4</sup> Black and AI/AN students disproportionately bore this debt: 82.9 percent of Black and 75.1 percent of AI/AN students graduated with student loan debt, compared to 60.9 percent of white and 40.8 percent of Asian American students.<sup>5</sup> Of graduates earning bachelor's degrees, 59.2 percent had federal loans and 14.6 percent had non-federal student loan debt. The vast majority—97 percent of all student loan debt holders earning bachelor's degrees—held at least some federal debt.

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<sup>4</sup> Department of Education, *NCES Digest of Education Statistics*, Table 331.95, [https://nces.ed.gov/programs/digest/d23/tables/dt23\\_331.95.asp](https://nces.ed.gov/programs/digest/d23/tables/dt23_331.95.asp) (last visited Nov. 18, 2024).

<sup>5</sup> As used in this Complaint, "white" means non-Hispanic white.

*Black and AI/AN students graduated at higher rates from CDR Ineligible Schools than did graduates of other races and national origins.*

68. As described in paragraphs 69 through 75, NCES data illustrate that Black and AI/AN students graduated at higher rates from CDR Ineligible Schools than did graduates of other races and national origins.<sup>6</sup>

69. Table 2 shows the percent of graduates earning bachelor’s degrees within each race and national origin group and under each CDR Policy threshold during the LOS period who met SouthEast’s non-CDR School Eligibility Criteria but, because they graduated from a CDR Ineligible School, were barred from completing an application. As seen in Table 2, around one fifth of all Black graduates would have been barred under each CDR Policy threshold due to their school. This rate is between triple and quintuple that of white graduates.

CDR Period	AI/AN	Asian	Black	Hispanic	NH/PI <sup>7</sup>	White
12/02/2016 - 10/15/2017	16.98%	1.32%	19.93%	6.92%	4.31%	4.37%
10/16/2017 - 09/25/2018	16.44%	1.26%	17.90%	5.94%	4.22%	4.12%
09/26/2018 - 02/13/2020	14.96%	1.38%	17.78%	6.67%	4.87%	4.36%
02/14/2020 - 10/12/2020	22.16%	1.92%	22.02%	6.53%	12.01%	6.21%
10/13/2020 - 04/05/2021	20.71%	3.08%	24.51%	8.62%	12.97%	7.84%

70. If the CDR policy had no impact based on race, the percent of excluded graduates who are Black would approximate the overall percent of graduates who are Black. Otherwise stated, comparing those two percentages would result in a ratio close to one. NCES data illustrate, however, that the CDR Policy excludes a disproportionate number of Black and AI/AN graduates.

<sup>6</sup> Department of Education, NCES, Integrated Postsecondary Education Data System (“IPEDS”), Complete Data Files, <https://nces.ed.gov/ipeds/datacenter/DataFiles.aspx?year=-1&surveyNumber=3&sid=369b5aca-47b2-4547-8887-3531ca539281&rtid=7> (last visited Nov. 19, 2024).

<sup>7</sup> “NH/PI” stands for Native Hawaiian/Pacific Islander.

71. For example, under the 10.8 CDR Policy threshold used by SouthEast between September 26, 2018, and February 13, 2020, Black students made up 9.42 percent of the preceding years’ total bachelor’s degree recipients from schools meeting the non-CDR School Eligibility Criteria, but they made up 28.16 percent of bachelor’s degree recipients from CDR Ineligible Schools. AI/AN graduates made up 0.46 percent of the total bachelor’s degree recipients, but more than double that rate—or 1.16 percent—of those bachelor’s degree recipients barred. In contrast, white graduates made up 62.06 percent of the total bachelor’s degree recipients, but 45.47 percent of all those barred.

72. Table 3 shows the relationship between those bachelor’s degree recipients of a single race or national origin excluded under the CDR Policy and their share of the total bachelor’s degree recipients from schools meeting the non-CDR Eligibility Criteria. This “disparity ratio” is calculated by dividing the former (the excluded group) by the latter (the excluded group’s share). For example, the 2.99 ratio for Black bachelor’s degree recipients under the CDR Policy threshold in effect between September 26, 2018, and February 13, 2020, is calculated by dividing 28.16 percent by 9.42 percent. Ratios greater than one reflect disproportionately worse outcomes, meaning greater exclusion by the CDR Policy; ratios less than one reflect better outcomes, meaning more inclusion by the CDR Policy.

<b>CDR Period</b>	<b>AI/AN</b>	<b>Asian</b>	<b>Black</b>	<b>Hispanic</b>	<b>NH/PI</b>	<b>White</b>
12/02/2016 - 10/15/2017	2.80	0.22	3.29	1.14	0.71	0.72
10/16/2017 - 09/25/2018	2.95	0.23	3.21	1.07	0.76	0.74
09/26/2018 - 02/13/2020	2.52	0.23	2.99	1.12	0.82	0.73
02/14/2020 - 10/12/2020	2.90	0.25	2.88	0.86	1.57	0.81
10/13/2020 - 04/05/2021	2.22	0.33	2.60	0.92	1.39	0.84

73. As seen in Table 3, the ratio between those bachelor’s degree recipients of a single race or national origin excluded under the CDR Policy and their share of the total bachelor’s



degree recipients from schools meeting the non-CDR Eligibility Criteria ranged from 2.60 to 3.29 for Black bachelor's degree recipients and from 2.22 to 2.95 for AI/AN bachelor's degree recipients. Thus, each CDR Policy threshold excluded a disproportionate number of Black and AI/AN bachelor's degree recipients. These rates are in marked contrast to other demographic groups, who with limited exceptions where the ratio was closer to one, were excluded less than their share of the total pool.

74. The ratios in Table 3 are statistically significant at the 1 percent level, which means that, if the CDR Policy had no impact based on race, the likelihood of seeing disparities of this degree or larger is less than 1 percent.

75. Similar, disproportionate exclusions occurred during the LOS period for those earning master's and doctorate degrees from schools meeting the non-CDR Eligibility Criteria: the ratio ranged from 2.07 to 2.80 for Black master's degree recipients, from 2.26 to 4.06 for Black doctorate degree recipients, from 1.90 to 3.45 for AI/AN master's degree recipients, and from 2.15 to 2.81 for AI/AN doctorate degree recipients. These rates are in marked contrast to other demographic groups, who with limited exceptions,<sup>8</sup> were excluded less than their share of the total pool.

*Black and AI/AN graduates were excluded by the CDR Policy at higher rates than those not in their demographic group.*

76. As described in paragraphs 77 through 81, NCES data also illustrate that Black and AI/AN graduates were excluded by the CDR Policy at higher rates than those not in their demographic group.

77. Table 4 compares each race and national origin demographic group bachelor's

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<sup>8</sup> This ratio ranged from 1.53 to 2.67 for Hispanic doctorate degree recipients. In all other cases the ratio was closer to one.

degree recipients to all other bachelor’s degree recipients outside of their race and national origin. The “relative risk ratios” in Table 4 are calculated by dividing the exclusion rate of the former group (those of a single race or national origin) by the exclusion rate of the latter group (those not in that single race or national origin). Similar to the within-group ratios described in Paragraphs 70 through 75, ratios greater than one reflect disproportionately worse outcomes; ratios less than one reflect better outcomes. As demonstrated in Table 4, Black and AI/AN bachelor’s degree recipients were excluded by the CDR Policy at higher rates than those not in their demographic group.

<b>Table 4: Bachelor’s Relative Risk Ratio</b>						
<b>CDR Period</b>	<b>AI/AN</b>	<b>Asian</b>	<b>Black</b>	<b>Hispanic</b>	<b>NH/PI</b>	<b>White</b>
12/02/2016 - 10/15/2017	2.82	0.21	4.31	1.17	0.71	0.49
10/16/2017 - 09/25/2018	2.98	0.21	4.17	1.08	0.76	0.52
09/26/2018 - 02/13/2020	2.53	0.22	3.77	1.14	0.82	0.51
02/14/2020 - 10/12/2020	2.93	0.24	3.58	0.84	1.57	0.63
10/13/2020 - 04/05/2021	2.23	0.31	3.12	0.91	1.39	0.67

78. Table 4 shows, for example, that under the 10.8 CDR Policy threshold used by SouthEast between September 26, 2018 and February 13, 2020, a Black bachelor’s degree recipient was 3.77 times more likely to be excluded under the CDR Policy than a bachelor’s degree recipient who was not Black. It also shows that under that 10.8 CDR Policy threshold an AI/AN bachelor’s degree recipient was 2.53 times more likely to be excluded by the CDR Policy than a bachelor’s degree recipient who was not AI/AN. Finally, it shows that members of all other demographic groups, with limited exceptions where the ratio was closer to one, were less likely to be excluded under the CDR Policy than non-group members.

79. Similar, disproportionate exclusions occurred during the LOS period for those earning master’s and doctorate degrees from schools meeting the non-CDR Eligibility Criteria: the ratio ranged from 2.38 to 3.55 for Black master’s degree recipients, from 2.51 to 5.28 for

Black doctorate degree recipients, from 1.91 to 3.49 for AI/AN master's degree recipients, and from 2.16 to 2.83 for AI/AN doctorate degree recipients. These rates are in marked contrast to other demographic groups, who with limited exceptions,<sup>9</sup> were less likely to be excluded under the CDR Policy than non-group members.

80. The ratios in Table 4 are statistically significant at the 1 percent level, which means that, if the CDR Policy had no impact based on race, the likelihood of seeing disparities of this degree or larger is less than 1 percent.

81. Disparities for Black and AI/AN graduates consistent with those in Tables 2-4 existed for bachelor's, master's, and doctorate degree types under each CDR Policy threshold.

*Black and AI/AN bachelor's degree recipients with student loan debt were likely excluded by the CDR Policy at higher rates than those not in their demographic group.*

82. As described in paragraphs 83 through 86, proxy data illustrate that Black and AI/AN bachelor's degree recipients with student loan debt were likely excluded by the CDR Policy at higher rates than those not in their demographic group.

83. Information about the race and national origin of bachelor's degree recipients with student loan debt can be approximated using public data released through NCES.

84. Using a proxy pool of bachelor's degree recipients with student loan debt from each school meeting SouthEast's non-CDR School Eligibility Criteria, statistical analyses reveal racially discriminatory denial disparities for Black and AI/AN borrowers.

85. During the LOS period, SouthEast denied ELFI Refinance Program loans to Black bachelor's degree recipients with student loan debt at a greater rate than borrowers who were not Black based solely on the CDR of their school at the time of application. During the LOS

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<sup>9</sup> This ratio ranged from 1.60 to 3.13 for Hispanic doctorate degree recipients. In all other cases the ratio was closer to one.

period, SouthEast denied ELFI Refinance Program loans to AI/AN bachelor's degree recipients with student loan debt at a greater rate than borrowers who were not AI/AN based solely on the CDR of their school at the time of application. These relative risk ratios, which ranged from 2.68 to 3.28 for Black bachelor's degree recipients with student loan debt and from 1.87 to 2.34 for AI/AN bachelor's degree recipients with student loan debt, are statistically significant at the 1 percent level.

86. These race disparities for bachelor's degree recipients with student loan debt from schools meeting the non-CDR School Eligibility Criteria were statistically significant at the 1 percent level for each CDR Policy threshold.

87. The statistical disparities in Paragraphs 83 through 86 are an appropriate proxy for, and the best available evidence of, the race disparities caused by SouthEast's CDR Policy for degree recipients with student loan debt from schools meeting the non-CDR School Eligibility Criteria.

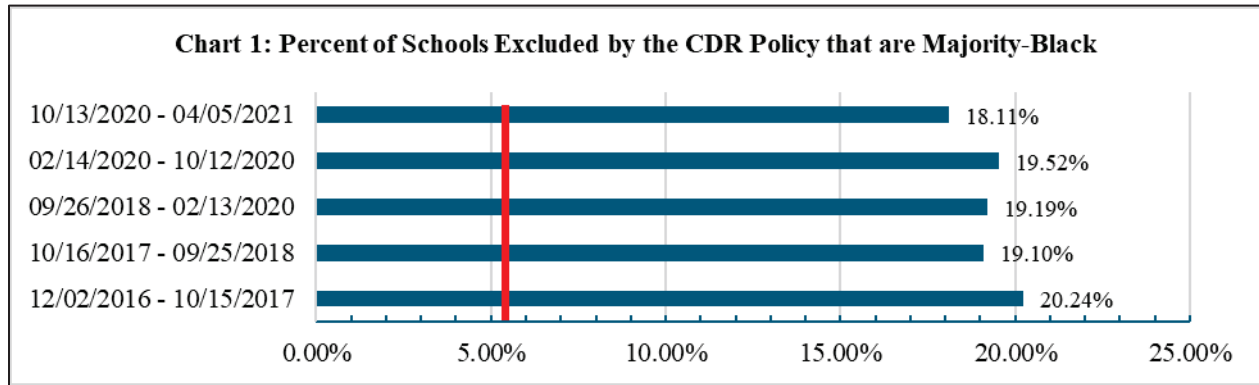
*Majority-Black schools were overrepresented among CDR Ineligible Schools.*

88. As described in paragraphs 89 through 91, NCES data also illustrate that under the CDR Policy, majority-Black schools, defined as those schools matriculating more than 50 percent Black students in every school year ending in 2015 through 2020, were overrepresented among CDR Ineligible Schools. The share of majority-Black schools that were always excluded was also higher than the share of non-majority Black schools that were always excluded.

89. During the LOS period, majority-Black schools constituted approximately 5.25 percent of schools meeting the non-CDR School Eligibility Criteria.

90. Chart 1 illustrates how every CDR Policy threshold used by SouthEast during the LOS period excludes majority-Black schools between three and four times their 5.25 percent

share of schools meeting the non-CDR School Eligibility Criteria.



91. Chart 1 shows that during the LOS period between 18.11 percent and 20.24 percent of CDR Ineligible Schools were majority-Black. If the CDR policy had no impact based on race, the blue horizontal bars—the share of majority-Black schools excluded under each listed CDR Policy threshold—would stop at the red vertical line—the 5.25 percent share of majority-Black schools meeting the non-CDR School Eligibility Criteria. But under each CDR Policy threshold the blue bar far exceeds the red line, illustrating that majority-Black schools were excluded by the CDR Policy far more than that 5.25 percent share.

92. Table 5 shows the percent of those majority-Black schools excluded as a share of all majority-Black schools that meet the non-CDR School Eligibility Criteria, compared to the percent of those non-majority Black schools excluded as a share of all non-majority Black schools that meet the non-CDR School Eligibility Criteria.

<b>Table 5: Percent of Majority-Black Schools and non-Majority Black Schools Excluded by the CDR Policy</b>		
<b>CDR Period</b>	<b>Percent of Non-Majority Black Schools Excluded</b>	<b>Percent of Majority Black Schools Excluded</b>
12/02/2016 - 10/15/2017	17.23%	78.90%
10/16/2017 - 09/25/2018	17.43%	74.31%
09/26/2018 - 02/13/2020	18.19%	77.98%
02/14/2020 - 10/12/2020	18.85%	82.57%
10/13/2020 - 04/05/2021	21.14%	84.40%

93. Table 5 shows stark differences between how the CDR Policy thresholds excluded

majority-Black schools and non-majority Black schools. For example, under the CDR Policy in effect from September 26, 2018 to February 13, 2020, 18.19 percent of non-majority Black schools meeting the non-CDR School Eligibility Criteria were excluded, in contrast to 77.98 percent of majority-Black schools.

94. Differences between excluded majority-Black and non-majority Black schools consistent with those in Table 5 existed under each CDR Policy threshold used by SouthEast.

### **Conclusion**

95. The CDR Policy explicitly bifurcated the potential borrower population, or those graduating with student loan debt from schools meeting the non-CDR School Eligibility Criteria, based on the CDR of the school from which they received a degree. Depending on whether a school's CDR fell below or above the CDR Policy threshold, potential borrowers from that school were either allowed to proceed to the "Get My Rate" stage or denied the opportunity to refinance their student loans. This bifurcation generated a disproportionate effect that would not have existed in its absence and that applied only to a population subset overrepresented by Black and AI/AN borrowers.

96. The set of schools singled out by the CDR Policy as ineligible were disproportionately attended by Black and AI/AN students, meaning that SouthEast's CDR Policy denied Black and AI/AN graduates at disproportionate rates.

97. This result caused economic and other harm to those discriminatorily excluded under the CDR Policy. According to SouthEast, in a 2021 survey, ELFI customers reported saving an average of \$278 per month, or \$20,774 over the life of their loan. Some of those individuals denied by SouthEast, including those denied under the CDR Policy, were unable to reap those savings.

98. SouthEast's CDR Policy operated to deny applicants irrespective of and before considering other more accurate indicia of individual borrower risk such as individual credit score, debt-to-income ratio, or employment.

99. This CDR Policy categorically barred people from accessing ELFI Refinance Program loans based on the school they attended and SouthEast's arbitrary and varying CDR Policy threshold.

100. The higher denial rates borne by Black and AI/AN borrowers for ELFI Refinance Program loans are due to SouthEast's specific policy and practice of automatically disqualifying student loan borrowers based on where they obtained their degree.

101. SouthEast's advertising practices and referral incentives amplified the CDR Policy's discriminatory impact.

102. SouthEast failed to adequately monitor for or remedy the effects of race disparities under its CDR Policy.

103. The policies and practices described above are not justified by, or designed to achieve, a legitimate business need that cannot reasonably be achieved as well by means that are less discriminatory on Black and AI/AN applicants and potential applicants.

#### **EQUAL CREDIT OPPORTUNITY ACT VIOLATIONS**

104. The United States incorporates all prior paragraphs of the Complaint as if fully set forth herein.

105. SouthEast's policies and practices, as alleged herein, constitute unlawful discrimination by disproportionately denying, and having the effect of denying, applicants for credit on the basis of race, in violation of ECOA, 15 U.S.C. § 1691(a)(1).

106. SouthEast's policies and practices, as alleged herein, constitute unlawful

discrimination by discouraging, and having the effect of discouraging, prospective applicants from applying for credit on the basis of race, in violation of ECOA, 15 U.S.C. § 1691(a); *see also* 15 U.S.C. § 1691e(g)-(h).

107. SouthEast's policies and practices, as alleged herein, failed to provide applicants with specific reasons for adverse actions taken, in violation of ECOA, 15 U.S.C. §§ 1691(d)(2)-(3).

108. SouthEast's policies and practices, as alleged herein, constitute a pattern or practice of discrimination and discouragement and resistance to the full enjoyment of rights secured by ECOA, 15 U.S.C. §§ 1691-1691f.

109. Persons who have been victims of SouthEast's discriminatory policies and practices, as described herein, are applicants and prospective applicants aggrieved within the meaning of ECOA, 15 U.S.C. § 1691e, and have suffered injury and damages because of SouthEast's conduct. In addition to potentially higher direct economic costs, some of the victims of discrimination suffered additional consequential economic damages, including possible increased risk of credit problems, default, and other damages, including emotional distress.

110. SouthEast's policies and practices, as alleged herein, were intentional, willful, or implemented with reckless disregard for the rights of Black and AI/AN borrowers.

111. ECOA empowers this Court to grant such relief as may be appropriate, including actual and punitive damages and injunctive relief. 15 U.S.C. § 1691e(h).

### **REQUEST FOR RELIEF**

WHEREFORE, the United States requests that the Court enter an ORDER that:

1. Declares that the policies and practices of SouthEast violate ECOA, 15 U.S.C. §§



1691-1691f.

2. Enjoins SouthEast and its agents, employees, assignees, and successors, and all other persons in active concert or participation with them, from:

A. Discriminating on the basis of race against any person with respect to any aspect of their credit transactions;

B. Discouraging applicants or prospective applicants on the basis of race with respect to any aspect of their credit transactions;

C. Failing or refusing to take such affirmative steps as may be necessary to restore, as nearly as practicable, the victims of SouthEast's unlawful conduct to the position they would have been in but for the discriminatory conduct; and

D. Failing or refusing to take such affirmative steps as may be necessary to prevent the recurrence of any such discriminatory conduct in the future; to eliminate, to the extent practicable, the effect of SouthEast's unlawful practices; and to implement policies and procedures to ensure that all borrowers have an equal opportunity to seek and obtain loans on a non-discriminatory basis and with non-discriminatory terms and conditions.

3. Awards equitable relief and monetary damages to all the victims of SouthEast's discriminatory policies and practices for the injuries caused by SouthEast, including direct economic costs, consequential damages, and other damages, under 15 U.S.C. § 1691e(h).

4. Awards the United States any additional relief that the interests of justice may require.

**JURY DEMAND**

The United States demands a trial by jury of all issues triable under Rule 38 of the Federal Rules of Civil Procedure.

Dated: January 18, 2025

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## Exhibit 1: Schools that Met the School Eligibility Criteria Every Year in the LOS Period

(Majority-Black schools appear in red text. HBCUs are followed by an asterisk.)

Abilene Christian University	Avila University	Brigham Young University-Provo
Adelphi University	Azusa Pacific University	Brown University
Adrian College	Babson College	Bryan College of Health Sciences
Adventist University of Health Sciences	Baker University	Bryan College-Dayton
Agnes Scott College	Baldwin Wallace University	Bryant University
AIB College of Business	Ball State University	Bryn Mawr College
Alaska Pacific University	Baptist Memorial College of Health Sciences	Bucknell University
Albany College of Pharmacy and Health Sciences	Bard College	Buena Vista University
Albertus Magnus College	Bard College at Simon's Rock	Burlington College
Albion College	Barnard College	Butler University
Albright College	Barnes-Jewish College Goldfarb School of Nursing	Cabarrus College of Health Sciences
Alfred University	Barry University	Cabrini University
Allegheny College	Bastyr University	Cairn University-Langhorne
Allen College	Bates College	Caldwell University
Alma College	Bay Path University	California Baptist University
Alvernia University	Baylor University	California College of the Arts
Alverno College	Becker College	California Institute of Integral Studies
Amberton University	Bellarmino University	California Institute of Technology
American College of the Building Arts	Bellevue College	California Institute of the Arts
American Conservatory Theater	Bellevue University	California Jazz Conservatory
American Indian College Inc	Bellin College	California Lutheran University
American International College	Belmont University	California Polytechnic State University-San Luis Obispo
American Jewish University	Beloit College	California State Polytechnic University-Pomona
American Musical and Dramatic Academy	Bemidji State University	California State University Maritime Academy
American University	Benedictine College	California State University-Bakersfield
Amherst College	Benedictine University	California State University-Channel Islands
Anderson University	Bennington College	California State University-Chico
Andrews University	Bentley University	California State University-Dominguez Hills
Anna Maria College	Berea College	California State University-East Bay
Antioch University-Los Angeles	Bergin University of Canine Studies	California State University-Fresno
Antioch University-Midwest	Berklee College of Music	California State University-Fullerton
Antioch University-Santa Barbara	Berry College	California State University-Long Beach
Antioch University-Seattle	Bethany Global University	California State University-Los Angeles
Appalachian Bible College	Bethany Lutheran College	California State University-Monterey Bay
Appalachian State University	Bethel University	California State University-Northridge
Aquinas College	Biola University	California State University-Sacramento
Arcadia University	Birmingham Southern College	California State University-San Bernardino
Arizona State University-Downtown Phoenix	Birthingway College of Midwifery	California State University-San Marcos
Arizona State University-Polytechnic	Bismarck State College	California State University-Stanislaus
Arizona State University-SkySong	Black Hills State University	California University of Management and Sciences
Arizona State University-Tempe	Blessing Rieman College of Nursing and Health Sciences	California University of Pennsylvania
Arizona State University-West	Bloomsburg University of Pennsylvania	Calvin University
Arkansas State University-Main Campus	Bluffton University	Cambridge College
Armstrong State University	Boise State University	Campbell University
Art Center College of Design	Bon Secours Memorial College of Nursing	Canisius College
Asbury University	Boston Architectural College	Capital University
Ashland University	Boston Baptist College	Capitol Technology University
Assumption College	Boston College	Cardinal Stritch University
Atenas College	Boston University	Carleton College
Athens State University	Bowdoin College	Carlos Albizu University-Miami
Atlantic Institute of Oriental Medicine	Bowling Green State University-Firelands	Carlos Albizu University-San Juan
Atlantic University College	Bowling Green State University-Main Campus	Carlow University
Auburn University	Bradley University	Carnegie Mellon University
Augsburg University	Brandeis University	Carroll College
Augusta University	Brandman University	Carroll University
Augustana College	Brenau University	Carson-Newman University
Augustana University	Brescia University	Carthage College
Aultman College of Nursing and Health Sciences	Bridgewater College	Cascadia College
Aurora University	Bridgewater State University	Case Western Reserve University
Austin College	Brigham Young University-Hawaii	
Austin Graduate School of Theology	Brigham Young University-Idaho	
Averett University		

## Exhibit 1: Schools that Met the School Eligibility Criteria Every Year in the LOS Period

(Majority-Black schools appear in red text. HBCUs are followed by an asterisk.)

Castleton University	Colorado State University-Global Campus	Doane University-Graduate and Professional Studies
Catholic Distance University	Colorado State University-Pueblo	Dominican College of Blauvelt
Cedar Crest College	Columbia College	Dominican University
Cedarville University	Columbia College Chicago	Dominican University of California
Centenary College of Louisiana	Columbia College of Nursing	Dongguk University-Los Angeles
Centenary University	Columbia University in the City of New York	Donnelly College
Central Baptist Theological Seminary	Conception Seminary College	Dordt University
Central College	Concordia College at Moorhead	Drake University
Central Connecticut State University	Concordia College-New York	Drew University
Central Methodist University-College of Liberal Arts and Sciences	Concordia University Texas	Drexel University
Central Michigan University	Concordia University-Ann Arbor	Duke University
Central Washington University	Concordia University-Chicago	Duquesne University
Centre College	Concordia University-Irvine	D'Youville College
Chadron State College	Concordia University-Nebraska	Earlham College
Chaminade University of Honolulu	Concordia University-Portland	East Carolina University
Champion Christian College	Concordia University-Saint Paul	East Stroudsburg University of Pennsylvania
Champlain College	Concordia University-Wisconsin	Eastern Connecticut State University
Chapman University	Connecticut College	Eastern Illinois University
Charles R Drew University of Medicine and Science	Converse College	Eastern Mennonite University
Charleston Southern University	Cooper Union for the Advancement of Science and Art	Eastern Michigan University
Charter Oak State College	Corban University	Eastern Nazarene College
Chatham University	Cornell College	Eastern Oregon University
Chestnut Hill College	Cornell University	Eastern University
Christian Brothers University	Cornerstone University	Eastern Washington University
Christian Life College	Cornish College of the Arts	Eckerd College
Christopher Newport University	Cottey College	Edgewood College
Cincinnati Christian University	Covenant College	Edinboro University of Pennsylvania
Cincinnati College of Mortuary Science	Cox College	EDP University of Puerto Rico Inc-San Juan
Citadel Military College of South Carolina	Creighton University	EDP University of Puerto Rico Inc-San Sebastian
City University of Seattle	Crossroads College	EDP University of Puerto Rico-Humacao
City Vision University	Crown College	EDP University of Puerto Rico-Manati
Claremont McKenna College	Culinary Institute of America	EDP University of Puerto Rico-Villalba
Clark University	Cumberland University	Elizabethtown College
Clarke University	CUNY Bernard M Baruch College	Elmhurst College
Clarks Summit University	CUNY Brooklyn College	Elmira College
Clarkson College	CUNY City College	Elon University
Clarkson University	CUNY Graduate School and University Center	Embry-Riddle Aeronautical University-Daytona Beach
Cleary University	CUNY Hunter College	Embry-Riddle Aeronautical University-Prescott
Clemson University	CUNY John Jay College of Criminal Justice	Emerson College
Cleveland Institute of Art	CUNY Lehman College	Emmanuel College
Cleveland Institute of Music	CUNY New York City College of Technology	Emmaus Bible College
Cleveland State University	CUNY Queens College	Emory University
Cleveland University-Kansas City	CUNY York College	Emporia State University
Coastal Carolina University	Curry College	Endicott College
Coe College	Curtis Institute of Music	Erskine College
Colby College	Daemen College	Eureka College
Colby-Sawyer College	Dakota State University	Evangel University
Colgate University	Dakota Wesleyan University	Excelsior College
College for Creative Studies	Dallas Baptist University	Fairfield University
College of Charleston	Dartmouth College	Fairleigh Dickinson University-Florham Campus
College of Mount Saint Vincent	Davidson College	Fairleigh Dickinson University-Metropolitan Campus
College of Our Lady of the Elms	Delaware Valley University	Faith Baptist Bible College and Theological Seminary
College of Saint Benedict	Denison University	Farmingdale State College
College of Saint Elizabeth	DePaul University	Fashion Institute of Technology
College of Saint Mary	DePauw University	Ferris State University
College of the Atlantic	DeSales University	Fitchburg State University
College of the Holy Cross	Dickinson College	Flagler College-St Augustine
College Unbound	Dickinson State University	
Colorado Christian University	Divine Word College	
Colorado College	Doane University	
Colorado School of Mines		
Colorado State University-Fort Collins		

## Exhibit 1: Schools that Met the School Eligibility Criteria Every Year in the LOS Period

(Majority-Black schools appear in red text. HBCUs are followed by an asterisk.)

Flagler College-Tallahassee	Hamline University	Jefferson College of Health Sciences
Florida Atlantic University	Hampden-Sydney College	Jewish Theological Seminary of America
Florida College	Hampshire College	John Brown University
Florida Gulf Coast University	Hampton University*	John Carroll University
Florida Institute of Technology	Hannibal-LaGrange University	John F. Kennedy University
Florida International University	Hanover College	John Paul the Great Catholic University
Florida Polytechnic University	Harding University	Johns Hopkins University
Florida Southern College	Hardin-Simmons University	Johnson & Wales University-Charlotte
Florida State University	Hartwick College	Johnson & Wales University-Denver
Fontbonne University	Harvard University	Johnson & Wales University-North Miami
Fordham University	Harvey Mudd College	Johnson & Wales University-Providence
Fort Hays State University	Hastings College	Johnson University
Framingham State University	Haverford College	Johnson University Florida
Francis Marion University	Hawaii Pacific University	Judson University
Franciscan University of Steubenville	Hebrew College	Juniata College
Franklin and Marshall College	Hebrew Theological College	Kalamazoo College
Franklin College	Heidelberg University	Kansas City Art Institute
Franklin Pierce University	Helene Fuld College of Nursing	Kansas State University
Franklin University	Hellenic College-Holy Cross Greek Orthodox School of Theology	Kansas Wesleyan University
Franklin W Olin College of Engineering	Hendrix College	Kean University
Freed-Hardeman University	High Point University	Keene State College
Fresno Pacific University	Hiram College	Kennesaw State University
Friends University	Hobart William Smith Colleges	Kent State University at Ashtabula
Frostburg State University	Hofstra University	Kent State University at East Liverpool
Furman University	Hollins University	Kent State University at Geauga
Gannon University	Holy Apostles College and Seminary	Kent State University at Kent
Gardner-Webb University	Holy Family University	Kent State University at Salem
Geneva College	Holy Names University	Kent State University at Stark
George Fox University	Hood College	Kent State University at Trumbull
George Mason University	Hope College	Kent State University at Tuscarawas
George Washington University	Hope International University	Kenyon College
Georgetown College	Houghton College	Kettering College
Georgetown University	Houston Baptist University	Kettering University
Georgia Christian University	Howard University*	Keuka College
Georgia College and State University	Hult International Business School	King University
Georgia Institute of Technology-Main Campus	Humboldt State University	King's College
Georgia Southern University	Humphreys University-Stockton and Modesto Campuses	Knox College
Georgia Southwestern State University	Huntington University	Kutztown University of Pennsylvania
Georgian Court University	Husson University	Kuyper College
Gettysburg College	Idaho State University	La Roche University
Goddard College	Illinois College	La Salle University
Golden Gate University-San Francisco	Illinois Institute of Technology	La Sierra University
Gonzaga University	Illinois State University	Laboure College
Good Samaritan College of Nursing and Health Science	Illinois Wesleyan University	Lafayette College
Gordon College	Immaculata University	LaGrange College
Goshen College	Indiana University of Pennsylvania-Main Campus	Laguna College of Art and Design
Goucher College	Indiana University-Bloomington	Lake Erie College
Governors State University	Indiana University-East	Lake Erie College of Osteopathic Medicine
Grace College and Theological Seminary	Indiana University-Kokomo	Lake Forest College
Grace Mission University	Indiana University-Purdue University- Fort Wayne	Lake Superior State University
Grace School of Theology	Indiana University-Purdue University- Indianapolis	Lakeland University
Grace University	Indiana University-South Bend	Lakeview College of Nursing
Graceland University-Lamoni	Indiana University-Southeast	Lamar University
Grand Valley State University	Indiana Wesleyan University	Lancaster Bible College
Grand View University	Indiana Wesleyan University-National and Global	Landmark College
Gratz College	Iona College	Lasell University
Green Mountain College	Iowa State University	Lawrence Technological University
Greenville University	Ithaca College	Lawrence University
Grinnell College	Jacksonville University	Le Moyne College
Guilford College	James Madison University	Lebanon Valley College
Gustavus Adolphus College		Lehigh University
Gwynedd Mercy University		Lenoir-Rhyne University
Hallmark University		Lesley University
Hamilton College		LeTourneau University

## Exhibit 1: Schools that Met the School Eligibility Criteria Every Year in the LOS Period

(Majority-Black schools appear in red text. HBCUs are followed by an asterisk.)

Lewis & Clark College	Marymount University	Morthland College
Lewis University	Maryville University of Saint Louis	Mount Aloysius College
Liberty University	Marywood University	Mount Carmel College of Nursing
Life Pacific University	Massachusetts College of Art and Design	Mount Holyoke College
Life University	Massachusetts College of Liberal Arts	Mount Ida College
Lincoln Christian University	Massachusetts Institute of Technology	Mount Marty College
Lincoln College	Massachusetts Maritime Academy	Mount Mary University
Lincoln Memorial University	Mayo Clinic School of Health Sciences	Mount Mercy University
Lindenwood University	Mayo Clinic School of Medicine	Mount Saint Joseph University
Linfield College-McMinnville Campus	McDaniel College	Mount Saint Mary College
Linfield College-Online and Continuing Education	McKendree University	Mount Saint Mary's University
Linfield College-School of Nursing	MCPHS University	Mount Vernon Nazarene University
Lipscomb University	Medical University of South Carolina	Muhlenberg College
LIU Brentwood	Mercer University	Multnomah University
LIU Brooklyn	Mercy College	Murray State University
LIU Riverhead	Mercy College of Health Sciences	Muskingum University
Lock Haven University	Mercy College of Ohio	Naropa University
Logan University	Meredith College	National Graduate School of Quality Management
Loma Linda University	Merrimack College	National Louis University
Long Island University	Messiah University	National University
Longwood University	Methodist College	National University of Health Sciences
Longy School of Music of Bard College	Metropolitan College of New York	National University of Natural Medicine
Loras College	Metropolitan State University	Nazareth College
Louisiana State University and Agricultural & Mechanical College	Metropolitan State University of Denver	Nebraska Methodist College of Nursing & Allied Health
Louisiana State University Health Sciences Center-New Orleans	MGH Institute of Health Professions	Nebraska Wesleyan University
Louisiana State University Health Sciences Center-Shreveport	Miami University-Hamilton	Neumann University
Louisiana State University-Shreveport	Miami University-Middletown	New College of Florida
Louisiana Tech University	Miami University-Oxford	New England Institute of Technology
Loyola Marymount University	Michigan Jewish Institute	New Jersey Institute of Technology
Loyola University Chicago	Michigan State University	New Mexico Institute of Mining and Technology
Loyola University Maryland	Michigan Technological University	New York College of Traditional Chinese Medicine
Loyola University New Orleans	MidAmerica Nazarene University	New York Institute of Technology
Lubbock Christian University	Middlebury College	New York School of Interior Design
Luther College	Midway University	New York University
Luther Rice University & Seminary	Midwestern Baptist Theological Seminary	Newman University
Lycoming College	Midwestern State University	Niagara University
Lyndon State College	Millersville University of Pennsylvania	North Carolina Central University*
Lynn University	Milligan University	North Carolina State University at Raleigh
Macalester College	Millikin University	North Central College
Madonna University	Mills College	North Central University
Maharishi University of Management	Millsaps College	North Dakota State University-Main Campus
Maine Maritime Academy	Milwaukee Institute of Art & Design	North Greenville University
Malone University	Milwaukee School of Engineering	North Park University
Manchester University	Minneapolis College of Art and Design	Northeastern Illinois University
Manhattan College	Minnesota State University Moorhead	Northeastern University
Manhattan School of Music	Minnesota State University-Mankato	Northern Arizona University
Manhattanville College	Minot State University	Northern Illinois University
Maranatha Baptist University	Misericordia University	Northern Kentucky University
Maria College of Albany	Mississippi College	Northern Michigan University
Marian University	Mississippi State University	Northern State University
Marietta College	Mississippi University for Women	Northland College
Marist College	Missouri Baptist University	Northwest Christian University
Marlboro College	Missouri State University-Springfield	Northwest Missouri State University
Marlboro College Graduate & Professional Studies	Missouri University of Science and Technology	Northwest Nazarene University
Marquette University	Molloy College	Northwest Suburban College
Martin Luther College	Monmouth College	Northwest University
Mary Baldwin University	Monmouth University	Northwestern College
Maryland Institute College of Art	Montana State University	Northwestern Health Sciences University
Marylhurst University	Montclair State University	Northwestern University
Marymount California University	Monterey Institute of International Studies	Northwood University
Marymount Manhattan College	Moody Bible Institute	
	Moravian College	
	Morningside College	

## Exhibit 1: Schools that Met the School Eligibility Criteria Every Year in the LOS Period

(Majority-Black schools appear in red text. HBCUs are followed by an asterisk.)

Northwood University-Texas	Pennsylvania State University-Penn State Altoona	Quinnipiac University
Norwich University	Pennsylvania State University-Penn State Beaver	Radford University
Notre Dame de Namur University	Pennsylvania State University-Penn State Berks	Ramapo College of New Jersey
Notre Dame of Maryland University	Pennsylvania State University-Penn State Brandywine	Randolph College
Nova Southeastern University	Pennsylvania State University-Penn State DuBois	Randolph-Macon College
Oakland City University	Pennsylvania State University-Penn State Erie-Behrend College	Ranken Technical College
Oakland University	Pennsylvania State University-Penn State Fayette- Eberly	Reed College
Oberlin College	Pennsylvania State University-Penn State Greater Allegheny	Reformed University
Occidental College	Pennsylvania State University-Penn State Harrisburg	Regent University
Ohio Dominican University	Pennsylvania State University-Penn State Hazleton	Regis College
Ohio Northern University	Pennsylvania State University-Penn State Lehigh Valley	Regis University
Ohio State University-Lima Campus	Pennsylvania State University-Penn State Mont Alto	Relay Graduate School of Education
Ohio State University-Main Campus	Pennsylvania State University-Penn State New Kensington	Rensselaer Polytechnic Institute
Ohio State University-Mansfield Campus	Pennsylvania State University-Penn State Schuylkill	Resurrection University
Ohio State University-Marion Campus	Pennsylvania State University-Penn State Shenango	Rhode Island College
Ohio State University-Newark Campus	Pennsylvania State University-Penn State Wilkes-Barre	Rhode Island School of Design
Ohio University-Chillicothe Campus	Pennsylvania State University-Penn State Worthington Scranton	Rhodes College
Ohio University-Eastern Campus	Pennsylvania State University-Penn State York	Rice University
Ohio University-Lancaster Campus	Pepperdine University	Rider University
Ohio University-Main Campus	Pfeiffer University	Ringling College of Art and Design
Ohio University-Southern Campus	Philadelphia University	Ripon College
Ohio University-Zanesville Campus	Phillips Beth Israel School of Nursing	Rivier University
Ohio Wesleyan University	Piedmont College	Roanoke College
Oklahoma Baptist University	Pittsburg State University	Robert Morris University
Oklahoma Christian University	Pitzer College	Robert Morris University Illinois
Oklahoma City University	Plymouth State University	Roberts Wesleyan College
Oklahoma State University-Main Campus	Point Loma Nazarene University	Rochester Institute of Technology
Oklahoma Wesleyan University	Point Park University	Rochester University
Old Dominion University	Polytechnic University of Puerto Rico-Miami	Rockford University
Olivet Nazarene University	Polytechnic University of Puerto Rico-Orlando	Rockhurst University
O'More College of Design	Pomona College	Rocky Mountain College
Oral Roberts University	Pontifical College Josephinum	Roger Williams University
Oregon College of Art and Craft	Portland State University	Rollins College
Oregon Health & Science University	Potomac State College of West Virginia University	Roosevelt University
Oregon Institute of Technology	Pratt Institute-Main	Rose-Hulman Institute of Technology
Oregon State University	Presbyterian College	Roseman University of Health Sciences
Otis College of Art and Design	Prescott College	Rowan University
Ottawa University-Jeffersonville	Princeton University	Rush University
Ottawa University-Kansas City	Providence College	Russell Sage College
Ottawa University-Milwaukee	Purdue University Northwest	Rutgers University-Camden
Ottawa University-Ottawa	Purdue University-Calumet Campus	Rutgers University-New Brunswick
Ottawa University-Phoenix	Purdue University-Main Campus	Rutgers University-Newark
Ottawa University-Surprise	Purdue University-North Central Campus	Sacred Heart Major Seminary
Otterbein University	Queens University of Charlotte	Sacred Heart University
Ouachita Baptist University	Quincy University	Saginaw Valley State University
Our Lady of the Lake College		Saint Ambrose University
Our Lady of the Lake University		Saint Anselm College
Ozark Christian College		Saint Anthony College of Nursing
Pace University		Saint Augustine College
Pacific Lutheran University		Saint Charles Borromeo Seminary-Overbrook
Pacific Northwest College of Art		Saint Cloud State University
Pacific Oaks College		Saint Edward's University
Pacific Union College		Saint Francis Medical Center College of Nursing
Pacific University		Saint Francis University
Palm Beach Atlantic University		Saint John Fisher College
Palmer College of Chiropractic		Saint Johns University
Palo Alto University		Saint Joseph Seminary College
Parker University		Saint Josephs College
Paul Smiths College of Arts and Science		Saint Joseph's College of Maine
Pennsylvania Academy of the Fine Arts		Saint Joseph's University
Pennsylvania College of Health Sciences		Saint Louis University
Pennsylvania State University-Main Campus		Saint Luke's College of Health Sciences
Pennsylvania State University-Penn State Abington		Saint Martin's University
		Saint Mary-of-the-Woods College

## Exhibit 1: Schools that Met the School Eligibility Criteria Every Year in the LOS Period

(Majority-Black schools appear in red text. HBCUs are followed by an asterisk.)

Saint Mary's College	Southern Methodist University	Tabor College
Saint Mary's College of California	Southern Nazarene University	Talmudic College of Florida
Saint Mary's University of Minnesota	Southern Oregon University	Tarleton State University
Saint Michael's College	Southern Utah University	Taylor University
Saint Norbert College	Southern Virginia University	Temple University
Saint Vincent College	Southwest Baptist University	Tennessee Technological University
Saint Xavier University	Southwest Minnesota State University	Texas A & M University-College Station
Salem College	Southwestern Adventist University	Texas A & M University-Corpus Christi
Salem State University	Southwestern College	Texas A & M University-Kingsville
Salisbury University	Southwestern University	Texas A&M University-Central Texas
Salve Regina University	Spalding University	Texas Christian University
Sam Houston State University	Spelman College*	Texas Lutheran University
Samford University	Spring Arbor University	Texas State University
Samuel Merritt University	Spring Hill College	Texas Tech University
San Diego State University	Springfield College	Texas Tech University Health Sciences Center
San Francisco Art Institute	St Bonaventure University	Texas Wesleyan University
San Francisco Conservatory of Music	St Catherine University	Texas Woman's University
San Francisco State University	St John's College of Nursing	The Baptist College of Florida
San Jose State University	St John's University-New York	The Boston Conservatory
San Juan Bautista School of Medicine	St Lawrence University	The Catholic University of America
Santa Clara University	St Luke's College	The Chicago School of Professional Psychology at Chicago
Sarah Lawrence College	St Olaf College	The Chicago School of Professional Psychology at Los Angeles
Savannah College of Art and Design	St Vincent's College	The Christ College of Nursing and Health Sciences
School of the Art Institute of Chicago	St. John's College	The College of Idaho
School of the Museum of Fine Arts-Boston	St. Joseph's College-Long Island	The College of New Jersey
Scripps College	St. Joseph's College-New York	The College of Saint Rose
Seattle Pacific University	St. Louis College of Pharmacy	The College of Saint Scholastica
Seattle University	St. Mary's College of Maryland	The College of Wooster
Sentara College of Health Sciences	St. Mary's University	The Juilliard School
Seton Hall University	St. Thomas Aquinas College	The King's College
Seton Hill University	St. Thomas University	The Master's University and Seminary
Sewanee-The University of the South	Stanford University	The New England Conservatory of Music
Shenandoah University	State University of New York at New Paltz	The New School
Shepherd University	Stephens College	The Robert B Miller College
Shiloh University	Sterling College	The University of Alabama
Shimer College	Stetson University	The University of Findlay
Shippensburg University of Pennsylvania	Stevens Institute of Technology	The University of Tampa
Siena College	Stevenson University	The University of Tennessee-Chattanooga
Siena Heights University	Stockton University	The University of Tennessee-Knoxville
Sierra Nevada College	Stonehill College	The University of Tennessee-Martin
Simmons University	Stony Brook University	The University of Texas at Arlington
Simpson College	Suffolk University	The University of Texas at Austin
Simpson University	SUNY at Albany	The University of Texas at Dallas
Skidmore College	SUNY at Binghamton	The University of Texas at San Antonio
Slippery Rock University of Pennsylvania	SUNY at Fredonia	The University of Texas at Tyler
Smith College	SUNY at Purchase College	The University of Texas Health Science Center at Houston
Soka University of America	SUNY College at Brockport	The University of Texas Health Science Center at San Antonio
Sonoma State University	SUNY College at Geneseo	The University of Texas MD Anderson Cancer Center
South Baylo University	SUNY College at Old Westbury	The University of Texas Medical Branch
South Dakota School of Mines and Technology	SUNY College at Oswego	The University of Texas Rio Grande Valley
South Dakota State University	SUNY College at Plattsburgh	The University of the Arts
South Florida Bible College and Theological Seminary	SUNY College at Potsdam	The University of West Florida
Southeastern Free Will Baptist Bible College	SUNY College of Environmental Science and Forestry	Thomas Aquinas College
Southeastern University	SUNY College of Technology at Alfred	Thomas Edison State University
Southern Adventist University	SUNY Cortland	Thomas Jefferson University
Southern California Institute of Architecture	SUNY Downstate Medical Center	Thomas More College of Liberal Arts
Southern California Seminary	SUNY Empire State College	Thomas More University
Southern California University of Health Sciences	SUNY Maritime College	Touro College
Southern Connecticut State University	SUNY Oneonta	
Southern Illinois University-Edwardsville	SUNY Polytechnic Institute	
	Susquehanna University	
	Swarthmore College	
	Sweet Briar College	
	Syracuse University	



## Exhibit 1: Schools that Met the School Eligibility Criteria Every Year in the LOS Period

(Majority-Black schools appear in red text. HBCUs are followed by an asterisk.)

Touro University Nevada	University of Cincinnati-Main Campus	University of Nebraska at Kearney
Touro University Worldwide	University of Colorado Boulder	University of Nebraska at Omaha
Towson University	University of Colorado Colorado Springs	University of Nebraska Medical Center
Transylvania University	University of Colorado Denver	University of Nebraska-Lincoln
Trevecca Nazarene University	University of Connecticut	University of Nevada-Las Vegas
Trine University	University of Dallas	University of Nevada-Reno
Trine University-Arizona Regional Campus	University of Dayton	University of New England
Trine University-Regional/Non-Traditional Campuses	University of Delaware	University of New Hampshire at Manchester
Trinity Christian College	University of Denver	University of New Hampshire-Main Campus
Trinity College	University of Detroit Mercy	University of New Haven
Trinity College of Nursing & Health Sciences	University of Evansville	University of North Carolina at Asheville
Trinity International University-Florida	University of Florida	University of North Carolina at Chapel Hill
Trinity International University-Illinois	University of Georgia	University of North Carolina at Charlotte
Trinity Lutheran College	University of Hartford	University of North Carolina at Greensboro
Trinity University	University of Hawaii at Hilo	University of North Carolina School of the Arts
Troy University	University of Hawaii at Manoa	University of North Carolina Wilmington
Truman State University	University of Hawaii-West Oahu	University of North Dakota
Tufts University	University of Holy Cross	University of North Florida
Tulane University of Louisiana	University of Houston	University of North Georgia
Union College	University of Houston-Clear Lake	University of North Texas
Union Institute & University	University of Houston-Downtown	University of Northern Colorado
Union University	University of Idaho	University of Northern Iowa
United States Merchant Marine Academy	University of Illinois at Chicago	University of Northwestern-St Paul
United States Sports Academy	University of Illinois at Springfield	University of Notre Dame
Unity College	University of Illinois at Urbana-Champaign	University of Oklahoma-Health Sciences Center
Universidad Ana G. Mendez-Cupey Campus	University of Indianapolis	University of Oklahoma-Norman Campus
Universidad Ana G. Mendez-Gurabo Campus	University of Iowa	University of Oregon
Universidad Ana G. Mendez-Online Campus	University of Jamestown	University of Pennsylvania
Universidad Central Del Caribe	University of Kansas	University of Pittsburgh-Bradford
Universidad del Sagrado Corazon	University of Kentucky	University of Pittsburgh-Greensburg
Universidad Politecnica de Puerto Rico	University of La Verne	University of Pittsburgh-Johnstown
University at Buffalo	University of Louisiana at Lafayette	University of Pittsburgh-Pittsburgh Campus
University of Alabama at Birmingham	University of Louisiana at Monroe	University of Portland
University of Alabama in Huntsville	University of Louisville	University of Puerto Rico-Aguadilla
University of Arizona	University of Lynchburg	University of Puerto Rico-Bayamon
University of Arizona-Sierra Vista	University of Maine	University of Puerto Rico-Cayey
University of Arkansas	University of Maine at Farmington	University of Puerto Rico-Mayaguez
University of Arkansas for Medical Sciences	University of Maryland	University of Puerto Rico-Medical Sciences
University of Arkansas System eVersity	University of Maryland-College Park	University of Puerto Rico-Rio Piedras
University of Baltimore	University of Maryland-University College	University of Puget Sound
University of Bridgeport	University of Massachusetts-Amherst	University of Redlands
University of California-Berkeley	University of Massachusetts-Boston	University of Rhode Island
University of California-Davis	University of Massachusetts-Dartmouth	University of Richmond
University of California-Irvine	University of Massachusetts-Lowell	University of Rochester
University of California-Los Angeles	University of Miami	University of Saint Francis-Fort Wayne
University of California-Merced	University of Michigan-Ann Arbor	University of Saint Joseph
University of California-Riverside	University of Michigan-Dearborn	University of Saint Katherine
University of California-San Diego	University of Michigan-Flint	University of Saint Mary
University of California-Santa Barbara	University of Minnesota-Crookston	University of San Diego
University of California-Santa Cruz	University of Minnesota-Duluth	University of San Francisco
University of Central Arkansas	University of Minnesota-Morris	University of Scranton
University of Central Florida	University of Minnesota-Rochester	University of Sioux Falls
University of Central Missouri	University of Minnesota-Twin Cities	University of South Alabama
University of Charleston	University of Mississippi	University of South Carolina Aiken
University of Chicago	University of Missouri-Columbia	University of South Carolina-Columbia
University of Cincinnati-Blue Ash College	University of Missouri-Kansas City	University of South Carolina-Upstate
University of Cincinnati-Clermont College	University of Missouri-St Louis	University of South Dakota
	University of Montevallo	
	University of Mount Union	

## Exhibit 1: Schools that Met the School Eligibility Criteria Every Year in the LOS Period

(Majority-Black schools appear in red text. HBCUs are followed by an asterisk.)

University of South Florida-Main Campus	Virginia Polytechnic Institute and State University	William Jessup University
University of South Florida-Sarasota-Manatee	Virginia Wesleyan University	William Jewell College
University of South Florida-St Petersburg	Viterbo University	William Paterson University of New Jersey
University of Southern California	Wabash College	William Woods University
University of Southern Indiana	Wagner College	Williams Baptist University
University of Southern Maine	Wake Forest University	Williams College
University of St Francis	Walla Walla University	Williamson Christian College
University of St Thomas	Walsh College	Wilmington College
University of Texas Southwestern Medical Center	Walsh University	Wilmington University
University of the Cumberland	Warner Pacific University	Wilson College
University of the Incarnate Word	Warren Wilson College	Wingate University
University of the Pacific	Wartburg College	Winona State University
University of the Sciences	Washington & Jefferson College	Winthrop University
University of Toledo	Washington Adventist University	Wisconsin Lutheran College
University of Tulsa	Washington and Lee University	Wittenberg University
University of Utah	Washington College	Wofford College
University of Vermont	Washington State University	Woodbury University
University of Virginia-Main Campus	Washington University in St Louis	Worcester Polytechnic Institute
University of Washington-Bothell Campus	Wayland Baptist University	Worcester State University
University of Washington-Seattle Campus	Wayne State College	World Mission University
University of Washington-Tacoma Campus	Wayne State University	Wright Career College
University of West Alabama	Waynesburg University	Wright State University-Lake Campus
University of West Georgia	Webb Institute	Wright State University-Main Campus
University of Western States	Weber State University	Xavier University
University of Wisconsin-Eau Claire	Webster University	Xavier University of Louisiana*
University of Wisconsin-Green Bay	Welch College	Yale University
University of Wisconsin-La Crosse	Wellesley College	Yeshiva University
University of Wisconsin-Madison	Wells College	York College of Pennsylvania
University of Wisconsin-Milwaukee	Wentworth Institute of Technology	Young Harris College
University of Wisconsin-Oshkosh	Wesleyan College	
University of Wisconsin-Platteville	Wesleyan University	
University of Wisconsin-River Falls	West Chester University of Pennsylvania	
University of Wisconsin-Stevens Point	West Liberty University	
University of Wisconsin-Stout	West Texas A & M University	
University of Wisconsin-Superior	West Virginia University	
University of Wisconsin-Whitewater	West Virginia University Institute of Technology	
University of Wyoming	West Virginia Wesleyan College	
Upper Iowa University	Western Carolina University	
Upstate Medical University	Western Colorado University	
Urshan College	Western Connecticut State University	
Ursinus College	Western Governors University	
Ursuline College	Western Illinois University	
Utah State University	Western Kentucky University	
Utah Valley University	Western Michigan University	
Utica College	Western New England University	
Valdosta State University	Western Oregon University	
Valley City State University	Western Washington University	
Valparaiso University	Westfield State University	
Vanderbilt University	Westminster College	
Vanguard University of Southern California	Westmont College	
Vassar College	Wheaton College	
Vaughn College of Aeronautics and Technology	Wheeling Jesuit University	
Veritas Baptist College	Wheelock College	
Vermont Technical College	Whitman College	
Villanova University	Whittier College	
Virginia Commonwealth University	Whitworth University	
Virginia International University	Wichita State University	
Virginia Military Institute	Widener University	
	Widener University-Delaware Campus	
	Wilkes University	
	Willamette University	
	William & Mary	
	William Carey University	
	William James College	

## Exhibit 2: Schools Excluded Under Some but Not All CDR Policy Cutoffs in the LOS Period

(Majority-Black schools appear in red text. HBCUs are followed by an asterisk.)

Adams State University	City College-Miami	Florida State College at Jacksonville
Alaska Bible College	<b>Claffin University*</b>	Fort Lewis College
<b>Albany State University*</b>	Clarion University of Pennsylvania	Gallaudet University
Alderson Broaddus University	<b>Clark Atlanta University*</b>	Georgia State University
Alice Lloyd College	<b>Clayton State University</b>	Gods Bible School and College
Allegheny Wesleyan College	Coker University	Goldey-Beacom College
<b>Allen University*</b>	Coleman University	Goodwin College
American University of Puerto Rico	College of Biblical Studies-Houston	Grace College of Divinity
Amridge University	College of Central Florida	Granite State College
Angelo State University	College of Coastal Georgia	Harrisburg University of Science and Technology
Antelope Valley College	College of St Joseph	Henderson State University
Antioch College	College of Staten Island CUNY	Heritage Bible College
<b>Apex School of Theology</b>	CollegeAmerica-Cheyenne	Heritage Christian University
Arapahoe Community College	CollegeAmerica-Colorado Springs	Heritage University
Arizona Christian University	CollegeAmerica-Denver	Hesston College
Arkansas Tech University	CollegeAmerica-Fort Collins	Highline College
Art Academy of Cincinnati	Colorado Mesa University	Hilbert College
Auburn University at Montgomery	Columbia Basin College	Hiwassee College
Austin Community College District	Columbia College Hollywood	Hobe Sound Bible College
Austin Peay State University	Columbia International University	Hodges University
Ave Maria University	Columbus College of Art and Design	Holy Cross College
Bacone College	Columbus State University	Homestead Schools
<b>Bainbridge State College</b>	Compass College of Cinematic Arts	Horizon University
Baptist Bible College	<b>Concordia College Alabama*</b>	Howard Payne University
Baptist Missionary Association Theological Seminary	Cooper Health System Center for Allied Health Education	Huntingdon College
Baptist University of the Americas	Criswell College	<b>Huntsville Bible College</b>
Barclay College	Crossroads Bible College	Indian River State College
Barton College	Crowley's Ridge College	Indiana State University
Beacon College	Culver-Stockton College	Indiana University-Northwest
Belhaven University	<b>CUNY Medgar Evers College</b>	International Baptist College and Seminary
Belmont Abbey College	Cypress College	Iowa Wesleyan University
<b>Benedict College*</b>	Dallas Christian College	Jacksonville State University
<b>Bennett College*</b>	<b>Dallas Nursing Institute</b>	John Wesley University
Bethany College	Dartmouth State College	<b>Jones College-Jacksonville</b>
Bethel College	Davenport University	Judson College
Bethel College-North Newton	Davis College	Kansas Christian College
Bethesda University	Daytona State College	Keiser University-Ft Lauderdale
<b>Beulah Heights University</b>	Defiance College	Kenrick Glennon Seminary
Blackburn College	Dell'Arte International School of Physical Theatre	Kentucky Christian University
Blue Mountain College	Delta State University	Kentucky Mountain Bible College
Bluefield College	Dewey University-Juana Díaz	Kentucky Wesleyan College
Bob Jones University	Dowling College	Keystone College
Boise Bible College	East Tennessee State University	King's University
Boricua College	East Texas Baptist University	Lake Washington Institute of Technology
<b>Bowie State University*</b>	Eastern Florida State College	Lake-Sumter State College
Brazosport College	Eastern Kentucky University	Lander University
Brevard College	Ecclesia College	<b>Lane College*</b>
Briar Cliff University	<b>Edward Waters College*</b>	Lee University
Broward College	Emory & Henry College	Lees-McRae College
Bryn Athyn College of the New Church	Everest College-Springfield	Limestone College
California Christian College	Everglades University	Lincoln University
California College San Diego	Fairmont State University	Lindsey Wilson College
Calumet College of Saint Joseph	Faith International University	Louisiana College
Calvary University	Faith Theological Seminary	Louisiana State University-Alexandria
<b>Carolina Christian College</b>	Family of Faith Christian University	Lourdes University
Carolina College of Biblical Studies	Faulkner University	Lyon College
<b>Carver Bible College</b>	Feather River Community College District	MacMurray College
Catawba College	Felician University	Magdalen College
Cazenovia College	<b>Fisk University*</b>	Maine College of Art
Centra College of Nursing	<b>Florida Agricultural and Mechanical University*</b>	Maine College of Health Professions
Central Baptist College	Florida Gateway College	Manhattan Christian College
Central Christian College of the Bible	Florida SouthWestern State College	Mansfield University of Pennsylvania
<b>Chicago State University</b>		Marshall University
<b>City College-Fort Lauderdale</b>		Marygrove College
City College-Gainesville		

## Exhibit 2: Schools Excluded Under Some but Not All CDR Policy Cutoffs in the LOS Period

(Majority-Black schools appear in red text. HBCUs are followed by an asterisk.)

Maryville College	Providence Christian College	SUNY College of Technology at Canton
Mayville State University	Puerto Rico Conservatory of Music	SUNY College of Technology at Delhi
McNeese State University	Reinhardt University	Tennessee Temple University
McPherson College	Remington College of Nursing Orlando	Tennessee Wesleyan University
Medaille College	Remington College-Dallas Campus	Texas A & M International University
Memphis College of Art	Remington College-Fort Worth Campus	Texas A & M University-Commerce
Menlo College	Remington College-Heathrow Campus	Texas A&M University-Texarkana
Mercyhurst University	Remington College-Honolulu Campus	<b>Texas Southern University*</b>
Messenger College	<b>Remington College-Memphis Campus</b>	The College of New Rochelle
Methodist University	Remington College-Mobile Campus	The College of the Florida Keys
Miami Dade College	Remington College-North Houston Campus	The Evergreen State College
Mid-America Christian University	<b>Remington College-Shreveport Campus</b>	The University of Montana
Mid-America College of Funeral Service	Remington College-Tampa Campus	The University of Montana-Western
Middle Tennessee State University	Renton Technical College	The University of Texas at El Paso
Midland University	Rogers State University	The University of Texas of the Permian Basin
Midwives College of Utah	Rosemont College	The University of Virginia's College at Wise
<b>Miles College*</b>	Saint Catharine College	Thiel College
MiraCosta College	Saint Johns River State College	Thomas College
Missouri Southern State University	Saint Leo University	Thomas University
Mitchell College	Saint Peter's University	Tiffin University
Montana State University-Billings	Salish Kootenai College	Toccoa Falls College
Montana State University-Northern	San Diego Christian College	Trinity Baptist College
Montreat College	San Diego Mesa College	Trinity Bible College and Graduate School
Montserrat College of Art	Santa Ana College	Trinity College of Florida
Moore College of Art and Design	Santa Fe College	<b>Trinity Washington University</b>
Morehead State University	Santa Monica College	Trocaire College
<b>Morris College*</b>	Schoolcraft College	Truett McConnell University
Mount Angel Seminary	Schreiner University	Tusculum University
Nazarene Bible College	Seattle Central College	<b>Tuskegee University*</b>
Nevada State College	<b>Selma University*</b>	Union College
New England College	Seminole State College of Florida	Universidad Ana G. Mendez-Carolina Campus
New Hampshire Institute of Art	Shasta Bible College and Graduate School	Universidad Teologica del Caribe
New Hope Christian College-Eugene	Shorter University	University of Akron Main Campus
New Jersey City University	<b>Shorter University-College of Adult &amp; Professional Programs</b>	University of Alaska Southeast
New Mexico Highlands University	Silver Lake College of the Holy Family	University of Arkansas at Little Rock
New York College of Health Professions	Skyline College	University of Central Oklahoma
Newberry College	Snow College	University of Central Oklahoma
Newbury College	South Florida State College	University of Dubuque
Nicholls State University	South Seattle College	<b>University of Fort Lauderdale</b>
Nichols College	Southeast Missouri Hospital College of Nursing and Health Sciences	University of Guam
<b>North Carolina A &amp; T State University*</b>	Southeast Missouri State University	University of Houston-Victoria
North Seattle College	Southeastern Bible College	University of Maine at Fort Kent
Northeastern State University	Southeastern Louisiana University	University of Memphis
Northern Vermont University	Southern Illinois University-Carbondale	University of Mobile
Northpoint Bible College	Southern New Hampshire University	University of Mount Olive
Northwestern Oklahoma State University	<b>Southern University and A &amp; M College*</b>	University of New Orleans
Northwestern State University of Louisiana	Southern Vermont College	University of North Alabama
Notre Dame College	Southern Wesleyan University	University of North Carolina at Pembroke
Nyack College	Southwestern Assemblies of God University	University of Providence
Oak Hills Christian College	Southwestern Oklahoma State University	University of Puerto Rico-Arecibo
Oglethorpe University	St Francis College	University of Puerto Rico-Carolina
Ohio Valley University	St Petersburg College	University of Puerto Rico-Humacao
Olivet College	St. Andrews University	University of Puerto Rico-Ponce
Palm Beach State College	St. Gregory's University	University of Puerto Rico-Utuado
Park University	State College of Florida-Manatee-Sarasota	University of Science and Arts of Oklahoma
Pasco-Hernando State College	Stephen F Austin State University	University of South Carolina Beaufort
Pennsylvania College of Art and Design	Sterling College	University of Southern Mississippi
Pennsylvania College of Technology	SUNY Buffalo State	University of the Ozarks
Peru State College	SUNY College of Agriculture and Technology at Cobleskill	University of the Southwest
Piedmont International University		<b>University of the Virgin Islands*</b>
Pillar College		University of the West
Point University		University of Valley Forge
Polk State College		
<b>Prairie View A &amp; M University*</b>		
Presentation College		

## Exhibit 2: Schools Excluded Under Some but Not All CDR Policy Cutoffs in the LOS Period

(Majority-Black schools appear in red text. HBCUs are followed by an asterisk.)

University of Wisconsin Colleges  
University of Wisconsin-Parkside  
Urbana University  
Valencia College  
VanderCook College of Music  
Voorhees College\*  
Washburn University  
Watkins College of Art Design & Film  
Webber International University  
West Los Angeles College  
William Peace University  
York College

### Exhibit 3: Schools Excluded Under All CDR Policy Cutoffs in the LOS Period

(Majority-Black schools appear in red text. HBCUs are followed by an asterisk.)

Abraham Baldwin Agricultural College	Eastern New Mexico University-Main Campus	Lincoln University*
Alabama A & M University*	East-West University	Livingstone College*
Alabama State University*	Edmonds Community College	Lorain County Community College
Alcorn State University*	Elizabeth City State University*	Lower Columbia College
Alliant International University-San Diego	Emmanuel College	Madison Area Technical College
Alpena Community College	Epic Bible College	Manor College
American Academy of Art	Everest University-Brandon	Mars Hill University
American Baptist College	Everest University-Jacksonville	Martin Methodist College
Andrew College	Everest University-Melbourne	Martin University
Arkansas Baptist College*	Everest University-North Orlando	McMurry University
Arlington Baptist University	Everest University-Orange Park	Mid-Atlantic Christian University
Atlanta Metropolitan State College	Everest University-Pompano Beach	Middle Georgia State University
Baker College	Everest University-South Orlando	Midland College
Bakersfield College	Everest University-Tampa	Mississippi Valley State University*
Bellingham Technical College	Fayetteville State University*	Missouri Valley College
Benjamin Franklin Institute of Technology	Ferrum College	Missouri Western State University
Bethany College	Finlandia University	Montana Technological University
Bethel University	Fisher College	Montessori Education Center of the Rockies
Bethune-Cookman University*	Florida Memorial University*	Morehouse College*
Bloomfield College	Foothill College	Morgan Community College
Bluefield State College*	Fort Valley State University*	Morgan State University*
Brewton-Parker College	Front Range Community College	New Mexico State University-Main Campus
Cameron University	Galveston College	Norfolk State University*
Campbellsville University	Georgia Gwinnett College	North American University
Caribbean University-Bayamon	Georgia Highlands College	North Carolina Wesleyan College
Caribbean University-Carolina	Georgia Military College	North Carolina State College
Caribbean University-Ponce	Glenville State College	North Central State College
Caribbean University-Vega Baja	Gordon State College	Northcentral University
Carolinas College of Health Sciences	Grace Christian University	Northern New Mexico College
Central Christian College of Kansas	Grambling State University*	Northwest Florida State College
Central State University*	Grays Harbor College	Northwestern Michigan College
Charlotte Christian College and Theological Seminary	Grayson College	Oakwood University*
Cheyney University of Pennsylvania*	Great Basin College	Ohio Christian University
Chowan University	Great Lakes Christian College	Oklahoma Panhandle State University
Clark College	Green River Community College	Oklahoma State University Institute of Technology
Clark State Community College	Greensboro College	Oklahoma State University-Oklahoma City
Clinton College*	Greenville Technical College	Olympic College
Clover Park Technical College	Gulf Coast State College	Paine College*
College of Southern Idaho	Harris-Stowe State University*	Paul Quinn College*
College of Southern Nevada	Henry Ford College	Peirce College
CollegeAmerica-Flagstaff	Herzing University-Akron	Peninsula College
CollegeAmerica-Phoenix	Herzing University-Atlanta	Pensacola State College
Collin County Community College District	Herzing University-Birmingham	Philander Smith College*
Colorado Mountain College	Herzing University-Brookfield	Pierce College-Fort Steilacoom
Columbia College	Herzing University-Kenner	Pikes Peak Community College
Community College of Denver	Herzing University-Kenosha	Pine Manor College
Concord University	Herzing University-Madison	Pittsburgh Technical College
Coppin State University*	Herzing University-Minneapolis	Pontifical Catholic University of Puerto Rico-Arecibo
Dalton State College	Herzing University-Toledo	Pontifical Catholic University of Puerto Rico-Mayaguez
Davis & Elkins College	Herzing University-Winter Park	Pontifical Catholic University of Puerto Rico-Ponce
Dean College	Huston-Tillotson University*	Pueblo Community College
Delaware State University*	Independence University	Purdue University Global
Delaware Technical Community College-Terry	Indiana Institute of Technology	Randall University
Dillard University*	Indiana Institute of Technology-College of Professions Studies	Red Rocks Community College
Dixie State University	Jackson College	Rust College*
Drury University	Jackson State University*	Saint Augustine's University*
Drury University-College of Continuing Professional Studies	Jarvis Christian College*	Saint Louis Christian College
Dunwoody College of Technology	Johnson C Smith University*	Savannah State University*
East Central University	Kentucky State University*	Shasta College
East Georgia State College	Lackawanna College	Shaw University*
	Lake Michigan College	
	Langston University*	
	Le Moyne-Owen College*	
	Lewis-Clark State College	

### Exhibit 3: Schools Excluded Under All CDR Policy Cutoffs in the LOS Period

(Majority-Black schools appear in red text. HBCUs are followed by an asterisk.)

Shawnee State University  
Sinclair Community College  
Skagit Valley College  
Solano Community College  
South Carolina State University\*  
South Georgia State College  
Southeastern Oklahoma State University  
Southern Arkansas University Main  
Campus  
Southern University at New Orleans\*  
Southwestern Christian College\*  
Southwestern Christian University  
Spartanburg Methodist College  
Spokane Community College  
Spokane Falls Community College  
Stevens-Henager College  
Stillman College\*  
Sul Ross State University  
SUM Bible College and Theological  
Seminary  
SUNY Morrisville  
Tacoma Community College  
Talladega College\*  
Tallahassee Community College  
Tennessee State University\*  
Texas College\*  
The University of Texas at Brownsville  
Tougaloo College\*  
Tri-State Bible College  
Truckee Meadows Community College  
Tyler Junior College  
United Tribes Technical College  
Universidad Adventista de las Antillas  
Universidad Central de Bayamon  
University of Alaska Anchorage  
University of Alaska Fairbanks  
University of Arkansas at Monticello  
University of Arkansas at Pine Bluff\*  
University of Arkansas-Fort Smith  
University of Hawaii Maui College  
University of Maine at Augusta  
University of Maine at Machias  
University of Maine at Presque Isle  
University of Maryland Eastern Shore\*  
University of New Mexico-Main Campus  
University of Northwestern Ohio  
University of Pikeville  
University of Rio Grande  
University of the District of Columbia\*  
Villa Maria College  
Vincennes University  
Virginia State University\*  
Virginia Union University\*  
Virginia University of Lynchburg\*  
Visible Music College  
Walla Walla Community College  
Warner University  
Wenatchee Valley College  
Wesley College  
West Virginia State University\*  
West Virginia University at Parkersburg  
West Virginia University Hospital  
Departments of Rad Tech and  
Nutrition  
Western Nevada College  
Western New Mexico University

Whatcom Community College  
Wilberforce University\*  
Wiley College\*  
William Penn University  
Winston-Salem State University\*  
Yakima Valley Community College  
Youngstown State University