



September 30, 2025

Attorney General Kwame Raoul
Office of the Attorney General
115 S. LaSalle Street
Chicago, Illinois 60603

Pranav G. Kothari
Chair
Illinois Board of Higher Education
1 North Old State Capitol Plaza, Suite 333
Springfield, Illinois 62701

**RE: Urgent Need to Protect Illinois Students and Borrowers from Public Institutions
Outsourcing Management of Online Programs to For-Profit Third Party Risepoint
(FKA Academic Partnerships)**

Dear Attorney General Raoul and Chair Kothari,

We send this letter to sound the alarm regarding findings from a recent investigation conducted by Protect Borrowers (formerly Student Borrower Protection Center), UIC United Faculty, and University Professionals of Illinois Local 4100. The investigation found Illinois public colleges and universities, including the University of Illinois system, appear to be renting out their reputable brand names while outsourcing vital services to Risepoint (formerly known as Academic Partnerships), a large and growing for-profit Online Program Manager (OPM),¹ affecting tens of thousands of Illinois students and borrowers.²

OPMs tend to offer a variety of services including marketing and advertising, recruitment, instruction, student support services like career counseling, and course design, and in exchange, receive a percentage of revenue dollars per student recruited by the OPM.³ These arrangements, known as tuition-sharing agreements, have been shown to lead to predatory tactics mirroring some of the worst practices by the for-profit college industry that disproportionately harms communities of color and low-income students.⁴ For example, OPMs have been found using

¹ Risepoint, *Impact Report* (2024), <https://risepoint.com/download/?file=2025%2F02%2FImpact-Report-2024.pdf>; PR Newswire, *TXST set to launch 18 new online degree programs in 2025*, Yahoo Finance (Sept. 30, 2024), <https://finance.yahoo.com/news/txst-set-launch-18-online-120000256.html>.

² The University of Illinois system alone offers over 151 online degree and certificate programs. See Illinois Online By the Numbers, University of Illinois Urbana-Champaign, https://www.iccb.org/wp-content/uploads/2025/04/2024_Distance_Education_Report_Final.pdf#page=7; <https://online.illinois.edu/numbers> (last visited Sept. 9, 2025).

³ Amber Villalobos, *A Quick Guide to Online Program Managers (OPMs)*, The Century Foundation (Oct. 24, 2023), <https://tcf.org/content/commentary/a-quick-guide-to-online-program-managers-opms/>.

⁴ “Available evidence suggests that tuition-sharing arrangements in OPM contracts create perverse incentives that lead to aggressive and deceptive recruiting practices, similar to those that pervade the for-profit college industry. For instance, basic information about the program, including cost, schedule, or admissions policies, may not be available to prospective students until they provide their contact information to the OPM, which the OPM company can then use for aggressive follow-up calls and text messages. An analysis of OPM contract terms found that tuition-sharing

inflated and false job placement data⁵ and high-pressure sales tactics,⁶ only to leave students burdened with a mountain of debt and without the success or skills they were promised.⁷ Due to deceptive white labeling practices,⁸ students have reported incorrectly believing that they are enrolled in an online program offered by reputable schools, not third-party, for-profit tech companies.⁹

Protect Borrowers reviewed hundreds of pages of documents obtained by WBEZ Chicago. We discovered that the structure of the contractual relationships between Risepoint and Illinois schools pose significant risks to students. Our investigation revealed that Risepoint is operating behind university brands, schools are granting Risepoint extraordinary power over university decision-making, and the contract terms we reviewed appear to prioritize Risepoint’s business interests over students’ privacy and financial wellbeing.

Academic Partnerships is now Risepoint

contracts often include provisions that prevent colleges and universities from making any changes that would lower revenue, which inflates college costs for students. Because colleges and universities often do not disclose whether an OPM is administering certain programs or advertising and recruiting on their behalf, students often have few ways to know whether their online degree program is engaging in these troubling practices.” U.S. Senator Elizabeth Warren, *Senators Warren and Brown Examine Questionable Business Practices of Largest Managers of Online Degree Programs* (Jan. 24, 2020), <https://www.warren.senate.gov/oversight/letters/senators-warren-and-brown-examine-questionable-business-practices-of-largest-managers-of-online-degree-programs>. See also Laura Hamilton and Christian Michael Smith, *OPM Contracts Reveal Risks for Students and Universities*, Protect Borrowers (July 19, 2022), <https://protectborrowers.org/opm-contracts-reveal-risks-for-students-and-universities/>; Laura Hamilton, et. al., *The Private Side of Public Universities: Third-party providers and platform capitalism*, UC Berkeley Center for Studies in Higher Education (2022), <https://escholarship.org/uc/item/7p0114s8>; Laura Hamilton, et. al., *How Online College Hurts More Than It Helps*, The Century Foundation (June 8, 2022), <https://tcf.org/content/commentary/how-online-college-hurts-more-than-it-helps/>; Stephanie Hall and Taela Dudley, *Dear Colleges: Take Control of Your Online Courses*, The Century Foundation (Sept. 12, 2019), <https://tcf.org/content/report/dear-colleges-take-control-online-courses/?agreed=1&session=1>.

⁵ *Oversight of Online Program Managers and Private Student Loan Borrower Protection*, Protect Borrowers and The Century Foundation (June 8, 2022),

https://protectborrowers.org/wp-content/uploads/2022/06/SBPC_TCF_CFPB-OPM-letter.pdf#page=6

⁶ Project on Predatory Student Lending, *OPMs: The Next Frontier of Predatory Practices in Higher Education*, <https://www.ppsl.org/news/opms-the-next-frontier-of-predatory-practices-in-higher-educationnbs> (last visited Sept. 9, 2025).

⁷ *Pushing Predatory Products*, Protect Borrowers (June 2021),

https://protectborrowers.org/wp-content/uploads/2021/06/SBPC_OPM.pdf#page=8; Ella Azoulay, *Mounting Evidence from State Watchdog Report Proves That, Yet Again, Public Universities Are Selling Out Students to For-Profit Companies*, Protect Borrowers (July 25, 2024),

<https://protectborrowers.org/california-auditor-report-opms-blog/>

⁸ *Selling Out Students: A Case Study in Brand-Name Schools Partnering with For-Profit Scammers to Make a Buck*, Protect Borrowers (March 2023),

<https://protectborrowers.org/selling-out-students-a-case-study-in-brand-name-schools-partnering-with-for-profit-scammers-to-make-a-buck/>.

⁹ *University of California: It Makes Limited Use of Online Program Management Firms but Should Provide Increased Oversight*, Auditor of the State of California (June 2024),

<https://www.auditor.ca.gov/wp-content/uploads/2024/06/2023-106-Report.pdf#page=55>.

In 2024, the company formerly known as Academic Partnerships announced its rebrand into Risepoint following its acquisition of Wiley University Services (Wiley), another large OPM in 2023.¹⁰ University faculty at the University of Toledo described Academic Partnerships as a “diploma mill.”¹¹ Both Academic Partnerships and Wiley have found themselves under scrutiny—the targets of a Senate oversight effort demanding transparency and data from the companies’ executives.¹² A decade ago, Academic Partnerships was reporting annual sales of \$100 million.¹³

Today, Risepoint manages online degree programs and certificate programs for public and private non-profit institutions, and boasts partnerships with at least 125 schools across 40 states.¹⁴ According to market analysts, Risepoint is now the largest OPM in the country; it is responsible for nearly one-third (30.5 percent) of all OPM-run programs and it holds the most partnerships (11.9 percent) of any OPM.¹⁵ The total number of Risepoint partnerships with Illinois institutions is unknown, though the documents provided by WBEZ Chicago and other sources uncovered at least five across the state of Illinois. Risepoint’s average tuition sharing agreement yields it nearly 50 percent of students’ tuition,¹⁶ and just one of its school contracts yielded the OPM \$178 million over 5 years.¹⁷ Risepoint is owned by a private-equity firm,

¹⁰ Press Release: Academic Partnerships Announces Acquisition of Wiley University Services, Academic Partnerships (Nov. 14, 2023), <https://newsroom.wiley.com/press-releases/press-release-details/2023/Academic-Partnerships-Announces-Acquisition-of-Wiley-University-Services/default.aspx>; Risepoint, *Impact Report* (2024), <https://risepoint.com/wp-content/uploads/2025/02/Impact-Report-2024.pdf>; Dahn Shaulis, *Risepoint: The Rise and Fall of Another OPM?*, *The Higher Education Inquirer* (March 12, 2025), <https://www.highereducationinquirer.org/2025/01/risepoint-rise-and-fall-of-another-opm.html>.

¹¹ Alec MacGillis, *Testing Time*, *The New Yorker* (Jan. 19, 2015), <https://www.newyorker.com/magazine/2015/01/26/testing-time>.

¹² U.S. Senator Elizabeth Warren, *Senators Warren and Brown Examine Questionable Business Practices of Largest Managers of Online Degree Programs* (Jan. 24, 2020), <https://www.warren.senate.gov/oversight/letters/senators-warren-and-brown-examine-questionable-business-practices-of-largest-managers-of-online-degree-programs>; U.S. Senator Elizabeth Warren, *Follow Up Letter to Online Program Managers* (Jan. 14, 2022), [https://www.warren.senate.gov/imo/media/doc/2022.01.14%20Follow%20up%20letter%20to%20Online%20Program%20Managers%20\(OPMs\).pdf](https://www.warren.senate.gov/imo/media/doc/2022.01.14%20Follow%20up%20letter%20to%20Online%20Program%20Managers%20(OPMs).pdf).

¹³ Ben St. Clair, *Jeb and For-Profit Higher Education*, *Inequality.org* (June 25, 2015), <https://inequality.org/article/jeb-for-profit-higher-education/>.

¹⁴ Press Release: Academic Partnerships Announces Acquisition of Wiley University Services, Academic Partnerships (Nov. 14, 2023), <https://newsroom.wiley.com/press-releases/press-release-details/2023/Academic-Partnerships-Announces-Acquisition-of-Wiley-University-Services/default.aspx>.

¹⁵ Validated Insights, Inc., *OPM Market Insights* (February 2025), <https://validatedinsightsopm2.carrrd.co/> at 14.

¹⁶ Academic Partnerships, *Letter Responding to U.S. Senators Elizabeth Warren and Sherrod Brown* (Feb. 21, 2020), <https://www.warren.senate.gov/imo/media/doc/2020%20OPM%20Reponses.pdf#page=11>.

¹⁷ Dahn Shaulis, *What do the University of Phoenix and Risepoint have in common? The answer is a compelling story of greed and politics.*, *The Higher Education Inquirer* (June 11, 2025), <https://www.highereducationinquirer.org/2025/06/what-do-university-of-phoenix-and.html>. These partnerships are also extremely lucrative for schools. See *University of California: It Makes Limited Use of Online Program Management Firms but Should Provide Increased Oversight*, Auditor of the State of California (June 2024), <https://www.auditor.ca.gov/wp-content/uploads/2024/06/2023-106-Report.pdf#page=50>; Ella Azoulay, *Mounting Evidence from State Watchdog Report Proves That, Yet Again, Public Universities Are Selling Out Students to*

Vistria Group, the same company that owns the scandal plagued¹⁸ for-profit college, University of Phoenix.¹⁹ Researchers at the University of California, Berkeley’s Center for Studies in Higher Education found that OPMs owned by private equity and venture capital firms were pressured to provide large, quick returns on investments which push OPMs further toward “the targeting of marginalized students, extraction of revenue, privatization by obfuscation, for-profit creep, and university captivity.”²⁰

Analyses of contracts between Risepoint and the University of Illinois indicate that the University of Illinois system’s Board of Trustees enters into contracts on behalf of its member institutions.²¹ Public records show that a current member of the board of trustees is also a partner and chief compliance officer of the private equity firm that owns Risepoint.²²

Findings

According to contracts obtained by WBEZ Chicago and reviewed by Protect Borrowers, Risepoint has tuition-sharing agreements with several public institutions of higher education across Illinois, including the University of Illinois Chicago (UIC), Eastern Illinois University, Southern Illinois University Edwardsville, and Southern Illinois University Carbondale.²³

For-Profit Companies, Protect Borrowers (July 25, 2024), <https://protectborrowers.org/california-auditor-report-opms-blog/>. Administrators and faculty at prestigious universities have referred to OPM-run programs as “cash cows.” See Kevin Carey, *The Creeping Capitalist Takeover of Higher Education*, HuffPost (April 1, 2019), <https://web.archive.org/web/20230723134556/https://www.huffpost.com/highline/article/capitalist-takeover-college/>; Michael Vasquez, ‘They Didn’t Care’: Inside One University’s Sputtering Online Partnership With 2U, *The Chronicle of Higher Education* (June 1, 2022), <https://www.chronicle.com/article/they-didnt-care-inside-one-universitys-sputtering-online-partnership-with-2u?sra=true>.

¹⁸ Veterans Education Success, University of Phoenix – Recent Actions and Concerns, <https://vetsedsuccess.org/university-of-phoenix-recent-actions-and-concerns/> (last visited Sept. 29, 2025); Press Release, c, Federal Trade Commission (Sept. 20, 2023), <https://www.ftc.gov/news-events/news/press-releases/2023/09/ftc-action-leads-us-dept-education-forgive-nearly-37-million-loans-students-deceived-university>.

¹⁹ Vistria, Impact Report (2024), https://vistria.com/wp-content/uploads/2024/12/2024_Vistria_ImpactReport_sml.pdf#page=14; <https://www.bloomberg.com/news/articles/2025-03-06/apollo-vistria-weigh-ipo-or-sale-of-the-university-of-phoenix>

²⁰ Laura Hamilton, et. al., *The Private Side of Public Universities: Third-party providers and platform capitalism*, UC Berkeley Center for Studies in Higher Education (2022), <https://escholarship.org/uc/item/7p0114s8>.

²¹ Appendix at 2.

²² Jesse H. Ruiz, Board of Trustees, University of Illinois System https://www.bot.uillinois.edu/about/meet_the_trustees/ruiz; Dahn Shaulis, *Risepoint: The Rise and Fall of Another OPM?*, *The Higher Education Inquirer* (March 12, 2025), <https://www.highereducationinquirer.org/2025/01/risepoint-rise-and-fall-of-another-opm.html>; <https://vistria.com/portfolio-items/risepoint/>. This is not the first time the company has allegedly engaged in such practices. The Washington Post in 2014 reported, “On some campuses, however, faculty members have viewed the arrival of Academic Partnerships with suspicion...Additional controversy erupted, he said, when some school officials involved in negotiations with the company later landed jobs with an affiliated firm.” See Tom Hamburger and Lyndsey Layton, *With eye on 2016, Jeb Bush resigns from all boards*, *Washington Post* (Dec. 31, 2014), https://www.washingtonpost.com/politics/with-eye-on-2016-jeb-bush-severs-ties-to-most-firms/2014/12/31/938b3662-9054-11e4-a900-9960214d4cd7_story.html.

²³ See generally Appendix.

Risepoint also has a longstanding relationship with the University of Illinois Springfield, and they planned to launch two new online programs together in fall 2025, one of which is now accepting applicants.²⁴ The contracts reveal that Risepoint provides services including, but not limited to, program development, program implementation, academic support services, and student support services. The most recent contract we reviewed runs through June 30, 2026, and is between Risepoint and the Board of Trustees of the University of Illinois on behalf of the University of Illinois Springfield.²⁵

The following findings demonstrate how the structure of the contractual relationships between Risepoint and Illinois schools pose significant risks to students:

1. **Risepoint is likely involved in institutional decision-making including course design, potentially violating federal revenue sharing rules.** Despite having markedly different missions and incentives, at least three public Illinois institutions delegate an extraordinary amount of decision-making power to a for-profit company for matters including enrollment, programs and classes offered, and program features. In the UIC-Risepoint contract, Risepoint is responsible for creating “program guidelines” and convening monthly status meetings related to program development and implementation, showing the OPM’s apparent ongoing role in program and course design.²⁶ The contract indicates Risepoint is also involved with course mapping and establishing annual start dates for the managed programs.²⁷ Since Risepoint is paid per recruited student, Risepoint will make more money if the classes are shorter and offered with greater frequency, regardless of the quality.²⁸

²⁴ University of Illinois Springfield, *UIS launches online graduate marketing certificates in partnership with Risepoint*, UISNews (June 10, 2025), <https://www.uis.edu/news/college-business-and-management/uis-launches-online-graduate-marketing-certificates-partnership-risepoint>; Risepoint, *The University of Illinois Springfield Launches Online Graduate Marketing Certificates in Partnership with Risepoint* (June 10, 2025), <https://risepoint.com/news/the-university-of-illinois-springfield-launches-online-graduate-marketing-certificates-in-partnership-with-risepoint/>; Risepoint, *Reaching underserved populations while increasing resources at UIS* (2025), <https://risepoint.com/success-stories/reaching-underserved-populations-while-increasing-resources-at-uis>; University of Illinois Springfield, *Graduate Certificate in Marketing Online*, <https://onlinecbm.uis.edu/degrees/business/graduate-certificates/marketing-cert/> (last visited Sept. 29, 2025).

²⁵ Appendix at 62; University of Illinois Springfield, *Accounting Data Analytics Graduate Certificate*, <https://www.uis.edu/aef/academic-programs/graduate-programs/accounting-data-analytics-graduate-certificate> (last visited Sept. 9, 2025); University of Illinois Springfield, *Accounting Data Analytics MBA Online*, <https://onlinecbm.uis.edu/degrees/business/mba/accounting-data-analytics/> (last visited Sept. 9, 2025).

²⁶ Appendix at 32.

²⁷ Appendix at 3.

²⁸ “On some campuses, however, faculty members have viewed the arrival of Academic Partnerships with suspicion. When the company arrived at Arkansas State University in 2011, for instance, faculty members were concerned ‘about a loss of quality and control,’ said Jack Zibluk, a professor of media studies who headed the faculty senate at the time.” See Tom Hamburger and Lyndsey Layton, *With eye on 2016, Jeb Bush severs ties to most firms*, Washington Post (Dec. 31, 2014), https://www.washingtonpost.com/politics/with-eye-on-2016-jeb-bush-severs-ties-to-most-firms/2014/12/31/938b3662-9054-11e4-a900-9960214d4cd7_story.html.

Moreover, Risepoint is known to contract with Instructional Connections, a company that provides online instructors and academic support staff.²⁹ The websites of these Risepoint-run online programs represent the programs as being offered by these reputable public institutions but the instructors may not be university faculty at all. Notably, in January, the U.S. Department of Education (the Department) published guidance explaining that Title IV schools and contracted OPMs are prohibited from “providing false, misleading, or inaccurate information about the nature of its educational program(s), its financial charges, or the employability of its graduates.”³⁰

Per the Department’s 2011 guidance pertaining to program integrity, the line between contractor and institution is meant to be clear and firm.³¹ The guidance expressly prohibits OPMs and other contractors from collaborating with their clients on institutional decisions.³² However, the Department has a history of lax enforcement of these rules,³³ and with the gutting of the Consumer Financial Protection Bureau and the Department, rigorous oversight is unlikely. But if any Illinois institutions with Risepoint contracts were deemed to be in violation of these Title IV rules, they could lose eligibility and access to federal student aid.

2. **Risepoint appears to pose as its university clients.** Some Illinois institutions are allowing the OPM to leverage their brands when establishing relationships with employers and to represent the university in conversations with students—including via advertisements—with seemingly no oversight from the institution. For example, Risepoint’s contract with University of Illinois Chicago grants the OPM the power to market “the university and its online programs using a variety of means as determined by [Risepoint].”³⁴ In that contract, the university prospectively grants Risepoint the right “to represent the university in forming affiliate relationships and related promotions without necessarily referencing Risepoint.”³⁵

²⁹ Instructional Connections, <https://instructionalconnections.com/> (last visited Sept. 9, 2025); Stephanie Hall, *It’s Time to Make Repairs to Online Higher Ed*, The Century Foundation (Sept. 12, 2022), <https://tcf.org/content/commentary/its-time-to-make-repairs-to-online-higher-ed/>.

³⁰ Federal Student Aid, (GEN-25-01) Notice of interpretation regarding misrepresentations by third-party service providers engaged by an institution of higher education, U.S. Dep’t of Educ., <https://fsapartners.ed.gov/knowledge-center/library/dear-colleague-letters/2025-01-16/notice-interpretation-regardin-g-misrepresentations-third-party-service-providers-engaged-institution-higher-education> (last visited Sept. 9, 2025).

³¹ Federal Student Aid, Implementation of Program Integrity Regulations, U.S. Dep’t. Of Educ. (March 17, 2011), <https://fsapartners.ed.gov/sites/default/files/attachments/dpccletters/GEN1105.pdf>.

³² Id.

³³ U.S. Gov’t. Accountability Office, *Higher Education: Education Needs to Strengthen Its Approach to Monitoring Colleges’ Arrangements with Online Program Managers* (April 2022), <https://www.gao.gov/assets/gao-22-104463.pdf>.

³⁴ Appendix at 2.

³⁵ Id.

Similarly, in Risepoint’s contract with Southern Illinois University at Carbondale (SIU), the institution “authorizes [Risepoint] to establish relationships with employers identified by [Risepoint]” and allows the OPM to promote its managed programs to the employer’s employees. The contract makes clear that the OPM is not authorized to enter into agreements with third parties (like employers) on behalf of the university. Despite this, the university is subsequently obligated to provide promotional discounts and “preferential” tuition rates to the OPM’s employer partners. Risepoint’s contract with UIC says: “the University has agreements with specific health care organizations, which provide a 10%, 15% or 20% tuition discount to their employees who enroll in UIC’s RN-BSN program. This discount applies as long as the student remains employed with its organization. As such, the full-priced tuition will be reduced by the applicable tuition discount before calculating AP’s revenue share.”³⁶ The terms and nature of Risepoint’s agreements with employers, and how these subsequently affect students is unknown.

Risepoint’s contract with SIU also has a section addressing web domain usage which says, “The University grants [Risepoint] the right to manage and host one of the following subdomains dedicated to the Managed Programs on the University’s web domain for the duration of this Agreement...”³⁷ The resulting subdomain at www.online.siu.edu makes no mention of Risepoint or any third party involvement in these programs. In fact, the page lists an SIU email address, onlinesaluki@siu.edu, below the “Contact Us” section which is likely to be an email address used by a Risepoint employee.³⁸ Research has found that universities contracting with OPMs have commonly provided OPM recruitment staff with a university email address.³⁹ This deceptive practice was specifically cited as an example of misrepresentation by the Department in January 2025.⁴⁰

³⁶ Appendix at 12. The referenced RN-BSN online program is advertised at University of Illinois Chicago, RN to BSN online,

<https://onlinenursing.uic.edu/online-programs/rn-bsn/> (last visited Sept. 9, 2025).

³⁷ Appendix at 269.

³⁸ Southern Illinois University Carbondale, SIU Online, <https://online.siu.edu/> (last visited Sept. 9, 2025).

³⁹ Laura Hamilton and Christian Michael Smith, *OPM Contracts Reveal Risks for Students and Universities*, Protect Borrowers (July 19, 2022), <https://protectborrowers.org/opm-contracts-reveal-risks-for-students-and-universities/>; Lisa Bannon and Rebecca Smith, *That Fancy University Course? It Might Actually Come From an Education Company*, Wall Street Journal (July 6, 2022), https://www.wsj.com/us-news/education/that-fancy-university-course-it-might-actually-come-from-an-education-company-11657126489?mod=article_inline.

⁴⁰ Federal Student Aid, (GEN-25-01) Notice of interpretation regarding misrepresentations by third-party service providers engaged by an institution of higher education, U.S. Dep’t of Educ., <https://fsapartners.ed.gov/knowledge-center/library/dear-colleague-letters/2025-01-16/notice-interpretation-regarding-misrepresentations-third-party-service-providers-engaged-institution-higher-education>; Protect Borrowers, *Improving Guidance on the Incentive Compensation Ban, Particularly with Respect to Bundled Services* (March 16, 2022), https://protectborrowers.org/wp-content/uploads/2023/03/SBPC_Bundled-Services_3_2023.pdf#page=4; Lisa Bannon and Rebecca Smith, *That Fancy University Course? It Might Actually Come From an Education Company*, Wall Street Journal (July 6, 2022), https://www.wsj.com/us-news/education/that-fancy-university-course-it-might-actually-come-from-an-education-company-11657126489?mod=article_inline.

3. **Risepoint may be putting student data and privacy at risk.** To address the risks associated with OPM access to student information, the Department initially issued updated third-party servicer guidance in 2023 clarifying that companies like Risepoint are, in fact, third-party servicers due to their access to and responsibility for protecting student information.⁴¹ However, this guidance never went into effect due to industry opposition. As a result, OPMs like Risepoint still have access to and control of student data including personal identifying information, information about course progress, and academic performance without any direct oversight or accountability.⁴²

In Risepoint's contract with the University of Illinois Chicago, the university is responsible for providing "daily extracts" from its student information system to the OPM as well as granting access to the institution's learning management system.⁴³ These extracts include information about applicants as well as students' course enrollment, activity, and performance information. The contract also grants Risepoint permission to forward this student information to its affiliates and other partners and to directly market other degree and certificate programs to them. A 2022 report issued by the Government Accountability Office found that the Department was failing to engage in necessary oversight into the partnerships between universities and OPMs.⁴⁴

[company-11657126489](#); Laura Hamilton and Christian Michael Smith, *OPM Contracts Reveal Risks for Students and Universities*, Protect Borrowers (July 19, 2022), <https://protectborrowers.org/opm-contracts-reveal-risks-for-students-and-universities/>; *Pushing Predatory Products*, Protect Borrowers (June 2021), https://protectborrowers.org/wp-content/uploads/2021/06/SBPC_OPM.pdf#page=11.

⁴¹ "These reviews have confirmed that most activities and functions performed by outside entities on behalf of an institution are intrinsically intertwined with the institution's administration of the Title IV programs and thus the entities performing such activities are appropriately subject to TPS requirements... Companies providing such services are sometimes referred to as "online program managers," or OPMs... We therefore issue this guidance to clarify that entities performing the functions of student recruiting and retention, the provision of software products and services involving Title IV administration activities, and the provision of educational content and instruction are defined as third-party servicers." Federal Student Aid, (GEN-23-03) Requirements and Responsibilities for Third-Party Servicers and Institutions (Updated November 14, 2024), U.S. Dep't of Educ., <https://fsapartners.ed.gov/knowledge-center/library/dear-colleague-letters/2023-02-15/requirements-and-responsibilities-third-party-servicers-and-institutions-updated-november-14-2024> (last visited Sept. 9, 2025). Despite this crystal clear guidance from the Department, it should be noted that Risepoint wrote in its contract with SIU that it is "Not a Third Party Servicer." See Appendix at 266.

⁴² Federal Student Aid, (GEN-23-03) Requirements and Responsibilities for Third-Party Servicers and Institutions (Updated November 14, 2024), U.S. Dep't of Educ., <https://fsapartners.ed.gov/knowledge-center/library/dear-colleague-letters/2023-02-15/requirements-and-responsibilities-third-party-servicers-and-institutions-updated-november-14-2024>; Bailey Graves, *ED Formally Rescinds 2023 Guidance Letter on Third-Party Servicers*, Education Review (Nov. 14, 2024), <https://er.educause.edu/articles/2024/11/ed-formally-rescinds-2023-guidance-letter-on-third-party-servicers>.

⁴³ Appendix at 5.

⁴⁴ U.S. Gov't. Accountability Office, *Higher Education: Education Needs to Strengthen Its Approach to Monitoring Colleges' Arrangements with Online Program Managers* (April 2022), <https://www.gao.gov/assets/gao-22-104463.pdf>.

4. **Risepoint recruiters may be advising students on courses or financial aid while pressuring them to enroll.** Risepoint primarily appears to be responsible for generating leads and chasing student enrollments. In fact, Risepoint’s contracts note that its staff are unable to provide academic counseling or financial aid guidance. However, Risepoint employees hold titles like “enrollment specialist” and Risepoint identifies its services as “student support” or “retention.”⁴⁵ This obfuscation raises the question about the OPM’s true scope of services and how much public funding flows to the OPM as a result. Importantly, the Higher Education Act classifies entities that “administer ‘any aspect’ of an institution’s participation in the Title IV programs” as a third-party servicer.⁴⁶

Often, institutions will claim they need to enter into tuition-sharing agreements with an OPM because they lack the resources to recruit students in a way that will keep its programs afloat.⁴⁷ Schools contract OPMs for recruitment services, despite evidence indicating that OPMs are copying the old playbook of predatory, for-profit colleges of aggressively recruiting vulnerable students with misleading promises.⁴⁸ Like for-profit colleges, OPMs have a track record of prioritizing profit over education by maximizing enrollment and minimizing investments in high-quality student instruction and support.⁴⁹

⁴⁵ See Appendix at 36, 32-34.

⁴⁶ The Department of Education has direct oversight authority over third-party servicers, particularly those that process financial aid on behalf of institutions. Experts and advocates have argued that the services provided and the student information collected by OPMs constitute third-party services; the OPM industry has thus far resisted such categorization. See U.S. Dep’t. Of Educ., *Requirements and Responsibilities for Third-Party Servicers and Institutions* (Feb. 28, 2023), <https://www.regulations.gov/document/ED-2022-OPE-0103-0009>; 20 U.S.C. § 1088(c). In addition, this could be an attempt to circumvent the Department’s 2011 incentive compensation guidance which requires colleges to contract OPMs for a “bundle” of services (in addition to recruitment) if they wish to pay the OPM on a per-student basis. U.S. Dep’t. Of Educ., *Program Integrity Questions and Answers - Incentive Compensation*, <https://www.ed.gov/laws-and-policy/higher-education-laws-and-policy/program-integrity-information-questions-and-4> (last visited Sept. 9, 2025).

⁴⁷ U.S. Gov’t. Accountability Office, *Higher Education: Education Needs to Strengthen Its Approach to Monitoring Colleges’ Arrangements with Online Program Managers* (April 2022), <https://www.gao.gov/assets/gao-22-104463.pdf#page=15>.

⁴⁸ Tricia L. Nadolny and Chris Quintana, *Black men were offered a second chance at college, then pitfalls piled up*, USA Today (June 1, 2023), <https://www.usatoday.com/in-depth/news/investigations/2023/06/01/morehouse-college-online-program-falls-short/70225028007/>; Lisa Bannon and Rebecca Smith, *That Fancy University Course? It Might Actually Come From an Education Company*, Wall Street Journal (July 6, 2022), https://www.wsj.com/us-news/education/that-fancy-university-course-it-might-actually-come-from-an-education-company-11657126489?mod=article_inline; Alan Blinder, *Students Paid Thousands for a Caltech Boot Camp. Caltech Didn’t Teach It.*, The New York Times (Sept. 29, 2024), <https://www.nytimes.com/2024/09/29/us/caltech-simplilearn-class-students.html>; Project on Predatory Student Lending, *Luna v. USC*, <https://www.ppsl.org/cases/luna-v-usc> (last visited Sept. 9, 2024); Melissa Korn, *University of Southern California Sued Over Education-School Rankings Claims*, Wall Street Journal (Dec. 20, 2022), <https://www.wsj.com/articles/university-of-southern-california-sued-over-education-school-rankings-claims-11671561070> Protect Borrowers, *Improving Guidance on the Incentive Compensation Ban, Particularly with Respect to Bundled Services* (March 16, 2022), https://protectborrowers.org/wp-content/uploads/2023/03/SBPC_Bundled-Services_3_2023.pdf.

⁴⁹ Ibid; Stephanie Hall, *Your OPM Isn’t a Tech Platform. It’s a Marketing Firm.*, The Century Foundation (Jan. 20, 2023),

In its contract with UIC, Risepoint is responsible for “local, in-person, recruiting in the Chicago Metropolitan Area as well as in mutually identified potential additional markets, for programs developed under this Agreement.”⁵⁰ In other words, Risepoint competes with its own client by recruiting local students into its online programs as opposed to existing graduate programs for which the university does not share revenue with the third party. Any bump in enrollment is sure to be temporary and unsustainable if these cannibalistic dynamics are in play as regularly as some suggest.⁵¹ If raising enrollment and revenue is the motivating factor for institutions that choose to contract with OPMs, the public should demand transparency and oversight in the name of program and institution sustainability.

Despite increased public awareness of risks associated with outsourcing the management of academic programs to private third parties, Illinois institutions have continued to enter into contracts with private companies that essentially hand off the state's public institutions and financial aid. We request that your offices investigate whether Risepoint and its partners are violating any Illinois or federal consumer protection laws,⁵² and hold them accountable for any actions that may deceive or financially harm tens of thousands of students and families across Illinois.

As the Trump Administration continues to dismantle the U.S. Department of Education and the Consumer Financial Protection Bureau, students and families are particularly vulnerable to the growing influence of OPMs like Risepoint across Illinois. Therefore, we respectfully request:

- The Illinois Attorney General investigates these partnerships and enforces federal and state consumer protection laws, including the Consumer Fraud and Deceptive Business Practices Act which prohibits the use of unfair or deceptive acts or practices, including the use of deception, fraud, misrepresentation, and suppression of material facts.
- The Illinois Board of Higher Education reviews these contracts between Risepoint and several Illinois institutions of higher education, investigates any potential conflicts of

<https://tcf.org/content/commentary/your-opm-isnt-a-tech-platform-its-a-predatory-marketing-firm/>.

⁵⁰ Appendix at 3.

⁵¹ Stephanie Hall, *Invasion of the College Snatchers*, The Century Foundation (Sept. 30, 2021), <https://tcf.org/content/report/invasion-college-snatchers/>.

⁵² 815 ILCS 505; 20 USC § 1019(8). The following are relevant guidance and regulations issued by the U.S. Department of Education. U.S. Dep’t. of Educ., *Notice of interpretation regarding misrepresentations by third-party service providers engaged by an institution of higher education*. (Jan. 14, 2025), <https://www.ed.gov/media/document/notice-of-interpretation-misrepresentation-109330.pdf>; U.S. Dep’t. Of Educ., *Program Integrity Questions and Answers - Incentive Compensation*, <https://www.ed.gov/laws-and-policy/higher-education-laws-and-policy/program-integrity-information-questions-and-4> (last visited Sept. 9, 2025); Federal Student Aid, (GEN-23-08) Update to Third-Party Servicer Guidance in GEN-23-03, U.S. Dep’t of Educ., <https://fsapartners.ed.gov/knowledge-center/library/dear-colleague-letters/2023-05-16/update-third-party-servicer-guidance-gen-23-03>.

interest, and provides transparency to students, the public, and advocates about the scope and extent of these partnerships.

Sincerely,

Protect Borrowers (formerly Student Borrower Protection Center)
UIC United Faculty
University Professionals of Illinois Local 4100