

APPENDICES

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APPENDIX A

COMPETITIVE PERFORMANCE AND CONTINUOUS SURVEILLANCE SCORE, RANK AND EVALUATION DATA

(Source: U.S. Department of Education)

Appendix A – Key KEY TO CPCS SPREADSHEETS

CODE	EXPLANATION	CODE	EXPLANATION
CIA	Current Inventory of Account (Number of Borrowers)	CIB	Current Inventory Balance (The dollar value of all loans assigned to the PCA at the end of the quarter)
AR	Administrative Resolution	AIB	Average Inventory Balance (The last 4 quarters of CIB / 4)
AR Rate	AR / CIA	DC	Dollars Collected
AR Total	Administrative Resolution Total	Rec Rate	Recovery Rate (DC / AIB)
TAS	Total Accounts Serviced	Rec Total	Recovery Rate Total
TAS Rate	TAS / CIA	SB	Small Business points
TAS Total	Total Accounts Serviced Total	CPCS Total	AR Total + TAS Total + Rec Total + SB

Appendix A(1) CPCS 8 Ranking — Small Business Pool October 1, 2011–December 31, 2011

OVERALL RANK	PCA NAME	CIA 8	AR 8	AR RATE	AR TOTAL	TAS 8	TAS RATE	TAS TOTAL	CIB 4	CIB 5	CIB 6	CIB 7	AIB 8	DC 8	REC RATE	REC TOTAL	CPCS TOTAL
1	COAST PROFESSIONAL	45,533	622	1.36%	10.00	9,243	20.30%	20.00	\$454,333,271	\$403,451,010	\$453,867,258	\$516,256,586	\$456,977,031	\$23,069,355	5.05%	70.00	100.00
2	COLLECTION TECHNOLOGY	51,377	650	1.26%	9.27	9,504	18.50%	18.23	\$522,190,968	\$509,780,539	\$523,457,321	\$585,069,644	\$535,124,618	\$18,493,730	3.46%	47.92	75.41
3	IMMEDIATE CREDIT RECOVERY	40,094	440	1.10%	8.04	6,428	16.03%	15.80	\$349,428,510	\$341,943,490	\$419,244,159	\$463,284,113	\$393,475,068	\$13,705,140	3.48%	48.30	72.13
4	NATIONAL RECOVERIES	40,642	464	1.14%	8.37	7,258	17.86%	17.60	\$382,690,054	\$413,148,990	\$413,755,595	\$462,387,606	\$417,995,561	\$13,808,937	3.30%	45.81	71.77
5	DELTA MANAGEMENT ASSOCIATES	47,566	507	1.07%	7.81	6,165	12.96%	12.77	\$310,016,462	\$320,369,397	\$406,472,391	\$539,781,036	\$394,159,822	\$12,283,092	3.12%	43.21	63.79

Appendix A(2)
CPCS 8 Ranking — Unrestricted Pool
October 1, 2011–December 31, 2011

OVERALL RANK	PCA NAME	CIA 8	AR 8	AR RATE	AR TOTAL	TAS 8	TAS RATE	TAS TOTAL	CIB 4	CIB 5	CIB 6	CIB 7	AIB 8	DC 8	REC RATE	REC TOTAL	CPCS TOTAL	SB	CPCS WSB TOTAL
1	FMS INVESTMENT CORP	89,901	1,213	1.35%	7.83	19,373	21.55%	18.70	\$834,605,630	\$848,609,134	\$921,419,737	\$1,007,977,526	\$903,153,007	\$43,095,074	4.77%	70.00	96.53	5.00	101.53
2	PIONEER CREDIT RECOVERY	99,221	1,448	1.46%	8.47	22,446	22.62%	19.63	\$1,092,273,743	\$1,005,453,117	\$1,056,333,077	\$1,136,107,464	\$1,072,541,850	\$49,658,611	4.63%	67.92	96.03	5.00	101.03
3	CONSERVE	94,641	1,230	1.30%	7.54	19,681	20.80%	18.05	\$880,866,382	\$879,760,233	\$1,010,197,754	\$1,085,096,003	\$963,980,093	\$45,299,520	4.70%	68.94	94.53	5.00	99.53
4	GC SERVICES LP	89,264	1,166	1.31%	7.58	19,398	21.73%	18.86	\$917,789,015	\$874,290,783	\$937,163,466	\$995,770,701	\$931,253,491	\$42,047,785	4.52%	66.24	92.68	5.00	97.68
5	PREMIERE CREDIT OF NORTH AMERICA	82,198	1,287	1.57%	9.08	14,682	17.86%	15.50	\$753,045,565	\$719,036,302	\$838,598,606	\$945,073,714	\$813,938,547	\$35,718,375	4.39%	64.38	88.96	5.00	93.96
6	NCO FINANCIAL SYSTEMS	87,891	1,435	1.63%	9.47	20,254	23.04%	20.00	\$1,162,078,467	\$1,077,367,907	\$941,401,659	\$959,812,759	\$1,035,165,198	\$41,607,440	4.02%	58.96	88.44	5.00	93.44
7	VAN RU CREDIT CORP	95,284	1,249	1.31%	7.61	19,555	20.52%	17.81	\$989,126,860	\$930,169,502	\$1,014,871,446	\$1,077,663,922	\$1,002,957,933	\$43,034,790	4.29%	62.95	88.36	5.00	93.36
8	PROGRESSIVE FINANCIAL SERVICES	76,167	1,313	1.72%	10.00	16,664	21.88%	18.99	\$824,573,657	\$756,164,761	\$816,147,008	\$869,286,912	\$816,543,085	\$32,117,021	3.93%	57.70	86.69	5.00	91.69
9	ERS	89,070	1,036	1.16%	6.75	17,266	19.38%	16.82	\$840,438,638	\$830,502,472	\$937,766,987	\$1,015,078,749	\$905,946,712	\$38,549,533	4.26%	62.42	86.00	5.00	91.00
10	PRI (FORMERLY DCS)	96,116	1,247	1.30%	7.53	18,467	19.21%	16.68	\$844,435,839	\$801,155,170	\$935,762,383	\$1,083,762,606	\$916,279,000	\$38,531,240	4.21%	61.69	85.90	5.00	90.90
11	EOS-CCA (COLLECTO INC)	76,998	1,189	1.54%	8.96	17,264	22.42%	19.46	\$810,960,850	\$713,079,683	\$855,762,564	\$883,815,730	\$815,904,707	\$31,198,563	3.82%	56.10	84.51	5.00	89.51
12	ACCOUNT CONTROL TECHNOLOGY	76,975	1,004	1.30%	7.57	15,020	19.51%	16.94	\$848,987,395	\$781,088,544	\$810,252,595	\$878,315,304	\$829,660,960	\$31,058,111	3.74%	54.92	79.42	5.00	84.42
13	WINDHAM PROFESSIONALS	83,224	998	1.20%	6.96	15,608	18.75%	16.28	\$736,780,490	\$715,492,446	\$858,414,271	\$931,256,797	\$810,486,001	\$29,756,176	3.67%	53.86	77.10	5.00	82.10
14	ALLIED INTERSTATE	80,637	962	1.19%	6.92	15,635	19.39%	16.83	\$888,045,548	\$826,984,520	\$894,980,370	\$930,633,159	\$885,160,899	\$31,881,171	3.60%	52.84	76.58	5.00	81.58
15	THE CBE GROUP	73,804	957	1.30%	7.52	13,603	18.43%	16.00	\$845,077,090	\$752,355,540	\$764,041,629	\$817,712,207	\$794,796,617	\$25,287,976	3.18%	46.68	70.19	5.00	75.19
16	WEST ASSET MANAGEMENT	74,390	883	1.19%	6.88	11,089	14.91%	12.94	\$463,844,902	\$452,844,346	\$744,778,022	\$851,373,353	\$628,210,156	\$20,821,929	3.31%	48.62	68.45	5.00	73.45
17	FINANCIAL ASSET MANAGEMENT	84,762	1,002	1.18%	6.86	13,861	16.35%	14.19	\$872,704,904	\$799,295,024	\$908,916,187	\$969,642,862	\$887,639,744	\$27,351,507	3.08%	45.20	66.25	5.00	71.25

Appendix A(3)
CPCS 9 Ranking — Small Business Pool
January 1, 2012–March 31, 2012

OVERALL RANK	PCA NAME	CIA 9	AR 9	AR RATE	AR TOTAL	TAS 9	TAS RATE	TAS TOTAL	CIB 5	CIB 6	CIB 7	CIB 8	AIB 9	DC 9	REC RATE	REC TOTAL	CPCS TOTAL
1	COAST PROFESSIONAL	57,237	622	1.09%	10.00	10,219	17.85%	20.00	\$403,451,010	\$453,867,258	\$516,256,586	\$737,042,841	\$527,654,424	\$23,069,355	4.37%	70.00	100.00
2	COLLECTION TECHNOLOGY	63,281	650	1.03%	9.46	9,313	14.72%	16.49	\$509,780,539	\$523,457,321	\$585,069,644	\$809,513,168	\$606,955,168	\$18,493,730	3.05%	48.78	74.73
3	IMMEDIATE CREDIT RECOVERY	49,813	440	0.88%	8.13	7,016	14.08%	15.78	\$341,943,490	\$419,244,159	\$463,284,113	\$645,645,861	\$467,529,406	\$13,705,140	2.93%	46.93	70.84
4	NATIONAL RECOVERIES	51,338	464	0.90%	8.33	7,478	14.57%	16.32	\$413,148,990	\$413,755,595	\$462,387,606	\$664,114,590	\$488,351,695	\$13,808,937	2.83%	45.27	69.92
5	DELTA MANAGEMENT ASSOCIATES	57,544	507	0.88%	8.12	6,624	11.51%	12.90	\$320,369,397	\$406,472,391	\$539,781,036	\$727,689,113	\$498,577,984	\$12,283,092	2.46%	39.44	60.46

Appendix A – Key KEY TO CPCS SPREADSHEETS

CODE	EXPLANATION	CODE	EXPLANATION
CIA	Current Inventory of Account (Number of Borrowers)	CIB	Current Inventory Balance (The dollar value of all loans assigned to the PCA at the end of the quarter)
AR	Administrative Resolution	AIB	Average Inventory Balance (The last 4 quarters of CIB / 4)
AR Rate	AR / CIA	DC	Dollars Collected
AR Total	Administrative Resolution Total	Rec Rate	Recovery Rate (DC / AIB)
TAS	Total Accounts Served	Rec Total	Recovery Rate Total
TAS Rate	TAS / CIA	SB	Small Business points
TAS Total	Total Accounts Served Total	CPCS Total	AR Total + TAS Total + Rec Total + SB

Appendix A(4) CPCS 9 Ranking — Unrestricted Pool January 1, 2012–March 31, 2012

OVERALL RANK	PCA NAME	CIA 9	AR 9	AR RATE	AR TOTAL	TAS 9	TAS RATE	TAS TOTAL	CIB 5	CIB 6	CIB 7	CIB 8	AIB 9	DC 9	REC RATE	REC TOTAL	CPCS TOTAL	SB	CPCS W/SB TOTAL
1	PIONEER CREDIT RECOVERY	122,201	1,448	1.18%	8.76	23,292	19.06%	19.43	\$1,005,453,117	\$1,056,333,077	\$1,136,107,464	\$1,566,688,350	\$1,191,145,502	\$49,658,611	4.17%	70.00	98.19	5.00	103.19
2	GC SERVICES LP	110,403	1,166	1.06%	7.81	21,661	19.62%	20.00	\$874,290,783	\$937,163,466	\$995,770,701	\$1,391,993,855	\$1,049,804,701	\$42,047,785	4.01%	67.25	95.06	5.00	100.06
3	FMS INVESTMENT CORP	111,968	1,213	1.08%	8.01	19,638	17.54%	17.88	\$848,609,134	\$921,419,737	\$1,007,977,526	\$1,422,125,993	\$1,050,033,097	\$43,095,074	4.10%	68.91	94.80	5.00	99.80
4	CONSERVE	115,491	1,230	1.07%	7.88	21,055	18.23%	18.58	\$879,760,233	\$1,010,197,754	\$1,085,096,003	\$1,477,581,189	\$1,113,158,795	\$45,299,520	4.07%	68.33	94.79	5.00	99.79
5	NCO FINANCIAL SYSTEMS	111,143	1,435	1.29%	9.54	21,329	19.19%	19.56	\$1,077,367,907	\$941,401,659	\$959,812,759	\$1,396,953,905	\$1,093,884,058	\$41,607,440	3.80%	63.87	92.97	5.00	97.97
6	VAN RU CREDIT CORP	115,554	1,249	1.08%	7.99	19,978	17.29%	17.62	\$930,169,502	\$1,014,871,446	\$1,077,663,922	\$1,459,001,642	\$1,120,426,628	\$43,034,790	3.84%	64.49	90.11	5.00	95.11
7	PREMIERE CREDIT OF NORTH AMERICA	102,128	1,287	1.26%	9.32	15,096	14.78%	15.07	\$719,036,302	\$838,598,606	\$945,073,714	\$1,320,358,247	\$955,766,717	\$35,718,375	3.74%	62.75	87.13	5.00	92.13
8	PROGRESSIVE FINANCIAL SERVICES	97,061	1,313	1.35%	10.00	17,909	18.45%	18.81	\$756,164,761	\$816,147,008	\$869,286,912	\$1,261,186,628	\$925,696,327	\$32,117,021	3.47%	58.26	87.06	5.00	92.06
9	PRI (FORMERLY DCS)	116,912	1,247	1.07%	7.89	21,622	18.49%	18.85	\$801,155,170	\$935,762,383	\$1,083,762,606	\$1,473,898,497	\$1,073,644,664	\$38,531,240	3.59%	60.26	87.00	5.00	92.00
10	ERS	110,930	1,036	0.93%	6.91	17,951	16.18%	16.50	\$830,502,472	\$937,766,987	\$1,015,078,749	\$1,425,075,567	\$1,052,105,944	\$38,549,533	3.66%	61.52	84.92	5.00	89.92
11	EOS-CCA (COLLECTO INC)	97,908	1,189	1.21%	8.98	18,695	19.09%	19.46	\$713,079,683	\$855,762,564	\$883,815,730	\$1,275,840,865	\$932,124,711	\$31,198,563	3.35%	56.20	84.64	5.00	89.64
12	ACCOUNT CONTROL TECHNOLOGY	94,665	1,004	1.06%	7.85	17,071	18.03%	18.38	\$781,088,544	\$810,252,595	\$878,315,304	\$1,210,310,296	\$919,991,685	\$31,058,111	3.38%	56.68	82.91	5.00	87.91
13	WINDHAM PROFESSIONALS	102,250	998	0.98%	7.22	18,135	17.74%	18.08	\$715,492,446	\$858,414,271	\$931,256,797	\$1,289,054,596	\$948,554,527	\$29,756,176	3.14%	52.67	77.97	5.00	82.97
14	ALLIED INTERSTATE	99,583	962	0.97%	7.14	15,186	15.25%	15.54	\$826,984,520	\$894,980,370	\$930,633,159	\$1,284,268,448	\$984,216,624	\$31,881,171	3.24%	54.39	77.07	5.00	82.07
15	THE CBE GROUP	92,322	957	1.04%	7.66	14,934	16.18%	16.49	\$752,355,540	\$764,041,629	\$817,712,207	\$1,164,029,832	\$874,534,802	\$25,287,976	2.89%	48.55	72.70	5.00	77.70
16	FINANCIAL ASSET MANAGEMENT	104,680	1,002	0.96%	7.08	14,030	13.40%	13.66	\$799,295,024	\$908,916,187	\$969,642,862	\$1,343,332,660	\$1,005,296,683	\$27,351,507	2.72%	45.68	66.42	5.00	71.42
17	WEST ASSET MANAGEMENT	91,346	883	0.97%	7.14	13,311	14.57%	14.85	\$452,844,346	\$744,778,022	\$851,373,353	\$1,169,882,898	\$804,719,655	\$20,821,929	2.59%	43.45	65.44	5.00	70.44

Appendix A(5) CPCS 10 Ranking—Small Business Pool April 1, 2012 — June 30, 2012

OVERALL RANK	PCA NAME	CIA 10	AR 10	AR RATE	AR TOTAL	TAS 10	TAS RATE	TAS TOTAL	CIB 6	CIB 7	CIB 8	CIB 9	AIB 10	DC 10	REC RATE	REC TOTAL	CPCS TOTAL
1	COAST PROFESSIONAL	69,678	622	0.89%	10.00	11,176	16.04%	20.00	\$453,867,258	\$516,256,586	\$737,042,841	\$804,524,818	\$627,922,876	\$23,069,355	3.67%	70.00	100.00
2	COLLECTION TECHNOLOGY	76,154	650	0.85%	9.57	9,647	12.67%	15.80	\$523,457,321	\$585,069,644	\$809,513,168	\$879,319,019	\$699,339,788	\$18,493,730	2.64%	50.39	75.75
3	NATIONAL RECOVERIES	62,701	464	0.74%	8.30	7,633	12.17%	15.18	\$413,755,595	\$462,387,606	\$664,114,590	\$725,770,058	\$566,506,962	\$13,808,937	2.44%	46.44	69.93
4	IMMEDIATE CREDIT RECOVERY	60,144	440	0.73%	8.20	7,081	11.77%	14.68	\$419,244,159	\$463,284,113	\$645,645,861	\$701,659,071	\$557,458,301	\$13,705,140	2.46%	46.84	69.72
5	DELTA MANAGEMENT ASSOCIATES	68,143	507	0.74%	8.35	7,048	10.34%	12.90	\$406,472,391	\$539,781,036	\$727,689,113	\$785,207,683	\$614,787,556	\$12,283,092	2.00%	38.07	59.31

Appendix A(6)
CPCS 10 Ranking—Unrestricted Pool
April 1, 2012 — June 30, 2012

OVERALL RANK	PCA NAME	CIA 10	AR 10	AR RATE	AR TOTAL	TAS 10	TAS RATE	TAS TOTAL	CIB 6	CIB 7	CIB 8	CIB 9	AIB 10	DC 10	REC RATE	REC TOTAL	CPCS TOTAL	SB	CPCS W\SB TOTAL
1	PIONEER CREDIT RECOVERY	146,106	1,448	0.99%	9.17	22,395	15.33%	17.84	\$1,056,333,077	\$1,136,107,464	\$1,566,688,350	\$1,696,298,296	\$1,363,856,797	\$49,658,611	3.64%	70.00	97.01	5.00	102.01
2	GC SERVICES LP	132,376	1,166	0.88%	8.15	22,751	17.19%	20.00	\$937,163,466	\$995,770,701	\$1,391,993,855	\$1,511,109,520	\$1,209,009,386	\$42,047,785	3.48%	66.86	95.02	5.00	100.02
3	NCO FINANCIAL SYSTEMS	135,340	1,435	1.06%	9.81	21,020	15.53%	18.07	\$941,401,659	\$959,812,759	\$1,396,953,905	\$1,528,229,187	\$1,206,599,378	\$41,607,440	3.45%	66.29	94.18	5.00	99.18
4	CONSERVE	137,188	1,230	0.90%	8.30	21,635	15.77%	18.35	\$1,010,197,754	\$1,085,096,003	\$1,477,581,189	\$1,595,176,915	\$1,292,012,965	\$45,299,520	3.51%	67.41	94.06	5.00	99.06
5	FMS INVESTMENT CORP	134,926	1,213	0.90%	8.32	20,808	15.42%	17.95	\$921,419,737	\$1,007,977,526	\$1,422,125,993	\$1,546,607,322	\$1,224,532,644	\$43,095,074	3.52%	67.66	93.93	5.00	98.93
6	VAN RU CREDIT CORP	136,620	1,249	0.91%	8.46	19,459	14.24%	16.57	\$1,014,871,446	\$1,077,663,922	\$1,459,001,642	\$1,573,208,072	\$1,281,186,270	\$43,034,790	3.36%	64.58	89.61	5.00	94.61
7	PRI (FORMERLY DCS)	138,543	1,247	0.90%	8.33	23,620	17.05%	19.84	\$935,762,383	\$1,083,762,606	\$1,473,898,497	\$1,591,146,761	\$1,271,142,562	\$38,531,240	3.03%	58.28	86.45	5.00	91.45
8	PREMIERE CREDIT OF NORTH AMERICA	122,860	1,287	1.05%	9.69	16,444	13.38%	15.58	\$838,598,606	\$945,073,714	\$1,320,358,247	\$1,432,728,676	\$1,134,189,811	\$35,718,375	3.15%	60.54	85.81	5.00	90.81
9	PROGRESSIVE FINANCIAL SERVICES	121,488	1,313	1.08%	10.00	19,268	15.86%	18.46	\$816,147,008	\$869,286,912	\$1,261,186,628	\$1,398,481,401	\$1,086,275,487	\$32,117,021	2.96%	56.84	85.30	5.00	90.30
10	ERS	133,665	1,036	0.78%	7.17	19,060	14.26%	16.59	\$937,766,987	\$1,015,078,749	\$1,425,075,567	\$1,548,306,787	\$1,231,557,023	\$38,549,533	3.13%	60.18	83.95	5.00	88.95
11	ACCOUNT CONTROL TECHNOLOGY	113,120	1,004	0.89%	8.22	18,315	16.19%	18.84	\$810,252,595	\$878,315,304	\$1,210,310,296	\$1,310,343,258	\$1,052,305,363	\$31,058,111	2.95%	56.74	83.80	5.00	88.80
12	EOS-CCA (COLLECTO INC)	119,640	1,189	0.99%	9.20	19,272	16.11%	18.74	\$855,762,564	\$883,815,730	\$1,275,840,865	\$1,393,648,769	\$1,102,266,982	\$31,198,563	2.83%	54.42	82.35	5.00	87.35
13	WINDHAM PROFESSIONALS	122,026	998	0.82%	7.57	19,820	16.24%	18.90	\$858,414,271	\$931,256,797	\$1,289,054,596	\$1,396,240,830	\$1,118,741,624	\$29,756,176	2.66%	51.14	77.61	5.00	82.61
14	ALLIED INTERSTATE	119,287	962	0.81%	7.46	15,663	13.13%	15.28	\$894,980,370	\$930,633,159	\$1,284,268,448	\$1,391,127,051	\$1,125,252,257	\$31,881,171	2.83%	54.47	77.21	5.00	82.21
15	THE CBE GROUP	111,567	957	0.86%	7.94	15,672	14.05%	16.35	\$764,041,629	\$817,712,207	\$1,164,029,832	\$1,268,317,101	\$1,003,525,192	\$25,287,976	2.52%	48.45	72.73	5.00	77.73
16	FINANCIAL ASSET MANAGEMENT	125,401	1,002	0.80%	7.39	13,037	10.40%	12.10	\$908,916,187	\$969,642,862	\$1,343,332,660	\$1,455,648,965	\$1,169,385,168	\$27,351,507	2.34%	44.97	64.46	5.00	69.46
17	WEST ASSET MANAGEMENT	108,967	883	0.81%	7.50	14,364	13.18%	15.34	\$744,778,022	\$851,373,353	\$1,169,882,898	\$1,265,378,814	\$1,007,853,272	\$20,821,929	2.07%	39.72	62.55	5.00	67.55

Appendix A(7)
CPCS 11 Ranking—Small Business Pool
July 1, 2012 — September 30, 2012

OVERALL RANK	PCA NAME	CIA 11	AR 11	AR RATE	AR TOTAL	TAS 11	TAS RATE	TAS TOTAL	CIB 7	CIB 8	CIB 9	CIB 10	AIB 11	DC 11	REC RATE	REC TOTAL	CPCS TOTAL
1	COAST PROFESSIONAL	91,750	622	0.68%	10.00	11,518	12.55%	20.00	\$516,256,586	\$737,042,841	\$804,524,818	\$1,050,782,556	\$777,151,700	\$23,069,355	2.97%	70.00	100.00
2	COLLECTION TECHNOLOGY	98,610	650	0.66%	9.73	10,649	10.80%	17.21	\$585,069,644	\$809,513,168	\$879,319,019	\$1,129,869,273	\$850,942,776	\$18,493,730	2.17%	51.25	78.18
3	NATIONAL RECOVERIES	82,873	464	0.56%	8.27	9,205	11.11%	17.70	\$462,387,606	\$664,114,590	\$725,770,058	\$950,793,825	\$700,766,520	\$13,808,937	1.97%	46.47	72.44
4	IMMEDIATE CREDIT RECOVERY	78,467	440	0.56%	8.27	7,875	10.04%	15.99	\$463,284,113	\$645,645,861	\$701,659,071	\$905,843,506	\$679,108,138	\$13,705,140	2.02%	47.59	71.85
5	DELTA MANAGEMENT ASSOCIATES	86,975	507	0.58%	8.61	7,648	8.79%	14.01	\$539,781,036	\$727,689,113	\$785,207,683	\$995,190,329	\$761,967,040	\$12,283,092	1.61%	38.01	60.63

Appendix A – Key KEY TO CPCS SPREADSHEETS

CODE	EXPLANATION	CODE	EXPLANATION
CIA	Current Inventory of Account (Number of Borrowers)	CIB	Current Inventory Balance (The dollar value of all loans assigned to the PCA at the end of the quarter)
AR	Administrative Resolution	AIB	Average Inventory Balance (The last 4 quarters of CIB / 4)
AR Rate	AR / CIA	DC	Dollars Collected
AR Total	Administrative Resolution Total	Rec Rate	Recovery Rate (DC / AIB)
TAS	Total Accounts Serviced	Rec Total	Recovery Rate Total
TAS Rate	TAS / CIA	SB	Small Business points
TAS Total	Total Accounts Serviced Total	CPCS Total	AR Total + TAS Total + Rec Total + SB

Appendix A(8) CPCS 11 Ranking–Unrestricted Pool July 1, 2012 — September 30, 2012

OVERALL RANK	PCA NAME	CIA 11	AR 11	AR RATE	AR TOTAL	TAS 11	TAS RATE	TAS TOTAL	CIB 7	CIB 8	CIB 9	CIB 10	AIB 11	DC 11	REC RATE	REC TOTAL	CPCS TOTAL	CPCS SB	CPCS W/SB TOTAL
1	PIONEER CREDIT RECOVERY	174,099	1,448	0.83%	9.31	24,148	13.87%	17.94	\$1,136,107,464	\$1,566,688,350	\$1,696,298,296	\$2,039,942,672	\$1,609,759,196	\$49,658,611	3.08%	70.00	97.25	5.00	102.25
2	FMS INVESTMENT CORP	161,809	1,213	0.75%	8.39	24,888	15.38%	19.89	\$1,007,977,526	\$1,422,125,993	\$1,546,607,322	\$1,876,367,784	\$1,463,269,656	\$43,095,074	2.95%	66.83	95.11	5.00	100.11
3	GC SERVICES LP	155,943	1,166	0.75%	8.37	23,251	14.91%	19.28	\$995,770,701	\$1,391,993,855	\$1,511,109,520	\$1,803,956,569	\$1,425,707,661	\$42,047,785	2.95%	66.92	94.58	5.00	99.58
4	CONSERVE	162,585	1,230	0.76%	8.47	22,055	13.57%	17.55	\$1,085,096,003	\$1,477,581,189	\$1,595,176,915	\$1,906,777,426	\$1,516,157,883	\$45,299,520	2.99%	67.80	93.81	5.00	98.81
5	NCO FINANCIAL SYSTEMS	163,679	1,435	0.88%	9.81	21,591	13.19%	17.06	\$959,812,759	\$1,396,953,905	\$1,528,229,187	\$1,875,697,698	\$1,440,173,387	\$41,607,440	2.89%	65.56	92.43	5.00	97.43
6	VAN RU CREDIT CORP	161,287	1,249	0.77%	8.67	20,229	12.54%	16.22	\$1,077,663,922	\$1,459,001,642	\$1,573,208,072	\$1,875,570,310	\$1,496,360,987	\$43,034,790	2.88%	65.26	90.15	5.00	95.15
7	PRI (FORMERLY DCS)	163,874	1,247	0.76%	8.52	24,831	15.15%	19.60	\$1,083,762,606	\$1,473,898,497	\$1,591,146,761	\$1,901,862,121	\$1,512,667,496	\$38,531,240	2.55%	57.80	85.92	5.00	90.92
8	PREMIERE CREDIT OF NORTH AMERICA	147,139	1,287	0.87%	9.79	18,560	12.61%	16.31	\$945,073,714	\$1,320,358,247	\$1,432,728,676	\$1,730,888,637	\$1,357,262,319	\$35,718,375	2.63%	59.72	85.82	5.00	90.82
9	ERS	158,036	1,036	0.66%	7.34	21,199	13.41%	17.35	\$1,015,078,749	\$1,425,075,567	\$1,548,306,787	\$1,851,247,347	\$1,459,927,113	\$38,549,533	2.64%	59.92	84.61	5.00	89.61
10	PROGRESSIVE FINANCIAL SERVICES	146,938	1,313	0.89%	10.00	21,268	14.47%	18.72	\$869,286,912	\$1,261,186,628	\$1,398,481,401	\$1,710,947,933	\$1,309,975,718	\$32,117,021	2.45%	55.63	84.35	5.00	89.35
11	ACCOUNT CONTROL TECHNOLOGY	145,126	1,004	0.69%	7.75	20,758	14.30%	18.50	\$878,315,304	\$1,210,310,296	\$1,310,343,258	\$1,667,167,804	\$1,266,534,166	\$31,058,111	2.45%	55.64	81.89	5.00	86.89
12	EOS-CCA (COLLECTO INC)	145,122	1,189	0.82%	9.17	19,646	13.54%	17.51	\$883,815,730	\$1,275,840,865	\$1,393,648,769	\$1,706,432,015	\$1,314,934,345	\$31,198,563	2.37%	53.84	80.52	5.00	85.52
13	ALLIED INTERSTATE	142,365	962	0.68%	7.56	18,282	12.84%	16.61	\$930,633,159	\$1,284,268,448	\$1,391,127,051	\$1,674,227,926	\$1,320,064,146	\$31,881,171	2.42%	54.80	78.97	5.00	83.97
14	WINDHAM PROFESSIONALS	145,209	998	0.69%	7.70	22,454	15.46%	20.00	\$931,256,797	\$1,289,054,596	\$1,396,240,830	\$1,680,573,922	\$1,324,281,536	\$29,756,176	2.25%	50.99	78.68	5.00	83.68
15	THE CBE GROUP	145,028	957	0.66%	7.39	16,117	11.11%	14.37	\$817,712,207	\$1,164,029,832	\$1,268,317,101	\$1,641,631,374	\$1,222,922,629	\$25,287,976	2.07%	46.92	68.68	5.00	73.68
16	FINANCIAL ASSET MANAGEMENT	149,670	1,002	0.67%	7.49	13,242	8.85%	11.44	\$969,642,862	\$1,343,332,660	\$1,455,648,965	\$1,753,309,175	\$1,380,483,416	\$27,351,507	1.98%	44.96	63.89	5.00	68.89
17	WEST ASSET MANAGEMENT	139,609	883	0.63%	7.08	15,533	11.13%	14.39	\$851,373,353	\$1,169,882,898	\$1,265,378,814	\$1,607,033,443	\$1,223,417,127	\$20,821,929	1.70%	38.62	60.09	5.00	65.09

Appendix A(9) U.S. Department of Education Bonuses to Debt Collection Agencies (FY 2012)

AGENCY	EARNED BONUS	AGENCY	EARNED BONUS
AG581 ConServe	\$2,409,673.16	AG592 Van Ru	\$552,027.25
AG585 FMS	\$3,570,584.10	AG595 Coast	\$3,017,121.46
AG586 GC Services	\$1,970,744.85	AG596 CTI	\$1,386,412.63
AG587 NCO	\$1,369,628.38	AG578 ACT	\$1,194,173.78
AG588 Pioneer	\$5,999,757.53	AG596 Performant	\$693,206.32
AG589 Premiere	\$185,955.26		

APPENDIX B

LOCAL BETTER BUSINESS BUREAU (BBB) & FEDERAL TRADE COMMISSION (FTC) COMPLAINTS AGAINST DEPARTMENT OF EDUCATION CONTRACTORS

PRIVATE COLLECTION AGENCY	NUMBER OF COMPLAINTS TO THE BBB FROM MARCH 2011 TO MARCH 2012	FTC COMPLAINTS IN 2012
Account Control Technology	4	15
Allied Interstate	296	62
CBE Group	72	467
Coast Professional	15	1
Collection Technology, Inc.	10	20
ConServe	35	2
Delta Management Associates	0	17
Diversified Collection Services	119	207
Enterprise Recovery Systems	13	73
EOS-CCA (formerly Collecto)	179	18
Financial Asset Management Systems	18	103
FMS Investment Corp. ¹	N/A	6
GC Services LP	86	452
Immediate Credit Recovery ²	N/A	17
National Recoveries	4	11
NCO Group	314	1619
Pioneer Credit Recovery	46	210
Premiere Credit of North America	18	39
Progressive Financial Services	69	242
Van Ru Credit Corporation	34	132
West Asset Management	50	440
Windham Professionals	47	222

¹ The local Better Business Bureau (BBB) located where FMS Investment Corp. operates does not have an online profile for the company.

² Immediate Credit Recovery also does not have a BBB profile.

APPENDIX C

THE NATIONAL CONSUMER LAW
CENTER'S FREEDOM OF INFORMATION
ACT REQUEST TO THE U.S. DEPARTMENT
OF EDUCATION

(March 29, 2013)



March 29, 2013

SENT VIA EMAIL

U.S. Department of Education
Office of Management
Regulatory Information Management Services
400 Maryland Avenue, SW, LBJ 2W220
Washington, DC 20202-4536
EDFOIAManager@ed.gov

Re: Freedom of Information Act Request

Dear Chief Information Officer:

On behalf of the National Consumer Law Center, pursuant to the Freedom of Information Act (FOIA), 5 U.S.C. § 552, I hereby request the following records:

Information about Private Collection Agency Contractor Performance Evaluation

- (1) All documents (including memorandum, letters, communications, forms, reports, and other data) used to calculate the Competitive Performance and Continuous Surveillance (CPCS) scores for each Private Collection Agency Contractor for Fiscal Year 2012, including documents and data submitted by each Private Collection Agency to the Department of Education.
- (2) All documents, results, and calculations relating to the ranking of Private Collection Agency Contractors based upon CPCS standing and scores for Fiscal Year 2012, including but not limited to:
 - a. The overall score awarded to each Private Collection Agency Contractor for every Performance Evaluation done in FY 2012;
 - b. The number of points awarded to each Private Collection Agency Contractor in all categories for every Performance Evaluation done in FY 2012; and
 - c. Each Private Collection Agency Contractor's ranking for every Performance Evaluation done in FY 2012.

www.NCLC.org

Boston Headquarters:

7 Winthrop Square
Boston, MA 02110-1245
Phone: 617/542-8010
Fax: 617/542-8028

Washington Office:

1001 Connecticut Ave. NW
Ste. 510
Washington, DC 20036-5528
Phone: 202/452-6252
Fax: 202/463-9462

- (3) All memorandum, reports, and other documents indicating the amount of any bonuses and/or incentive fees paid to each Private Collection Agency Contractors based upon CPCS standing and scores, or for any other reason in Fiscal Year 2012.

In your response to this request, please specify whether: (1) you are providing all documents responsive to the request; (2) no documents exist that are responsive to the request; or (3) documents exist that are responsive to the request, but you are claiming that some or all of those documents are exempt from disclosure.

If it is your position that some of the requested documents or some portion of any of the requested documents are exempt from disclosure, please provide the nonexempt portions of those records. In addition, if it is your position that records exist that are responsive to this request, but that those records (or portions of those records) are exempt from disclosure, please identify the records that are being withheld and state the basis for the denial for each document being withheld. Also, please identify the person making the decision to deny the request.

The National Consumer Law Center requests that all fees in connection with this FOIA request be waived in accordance with 5 U.S.C. § 552(a)(4)(A)(iii), because it does not seek the records for a commercial purpose and disclosure is in the public interest because it is likely to contribute significantly to public understanding of the operations and activities of the government. The National Consumer Law Center, a nonprofit corporation founded in 1969, assists consumers, advocates, and public policy makers nationwide who use the powerful and complex tools of consumer law to ensure justice and fair treatment for all, particularly those whose poverty renders them powerless to demand accountability.

The National Consumer Law Center regularly issues reports, books, and newsletters on consumer issues, including student loan law, which are distributed to consumers, lawyers, academics, and other interested parties. These publications, which are listed on our website, www.nclc.org and www.studentloanborrowerassistance.org, often include information obtained through FOIA. We expect to publish information we receive pursuant to this FOIA request because to do so would contribute significantly to the public's understanding of student loan programs. Please note that your office has previously granted fee waivers for our organization and should have basic information about us on file.

Accordingly, we request that you waive all fees for locating and duplicating the requested records. If, however, a waiver is not granted, then please advise us of the amount of any proposed search and reproduction charges before those activities are carried out.

We will expect a response within 20 working days as provided by law. If you have any questions regarding this request, please contact me at (617) 542-8010.

Thank you very much for your attention to this matter.

Sincerely,
/s/
Persis S. Yu

APPENDIX D

THE U.S. DEPARTMENT OF EDUCATION'S
DENIAL OF THE NATIONAL CONSUMER
LAW CENTER'S FREEDOM OF
INFORMATION ACT REQUEST

(including sample documents)



UNITED STATES DEPARTMENT OF EDUCATION

OFFICE OF MANAGEMENT

Privacy, Information, and Records Management Services

August 2, 2013

Ms. Persis Yu
Staff Attorney
National Consumer Law Center
7 Winthrop Square, 4th Floor
Boston, MA 02110

RE: FOIA Request No. 13-01138-F

Dear Ms. Yu:

This is the Department's final response to your e-mail dated March 29, 2013, requesting information pursuant to the Freedom of Information Act (FOIA), 5 U.S.C. § 552. You requested that a copy of the following documents or documents containing the following information be provided to you:

- Information about Private Collection Agency Contractor Performance Evaluation:
 1. All documents (including memorandum, letters, communications, forms, reports, and other data) used to calculate the Competitive Performance and Continuous Surveillance (CPCS) scores for each Private Collection Agency Contractor for Fiscal Year 2012, including documents and data submitted by each Private Collection Agency to the Department of Education.
 2. All documents, results, and calculations relating to the ranking of Private Collection Agency Contractors based on CPCS standing and scores for Fiscal Year 2012, including but not limited to:
 - a. The overall score awarded to each Private Collection Agency Contractor for every Performance Evaluation done in FY 2012;
 - b. The number of points awarded to each Private Collection Agency Contractor in all categories for every Performance Evaluation done in FY 2012; and
 - c. Each Private Collection Agency Contractor's ranking for every Performance Evaluation done in FY 2012.
 3. All memoranda, reports, and other documents indicating the amount of any bonuses and/or incentive fees paid to each Private Collection Agency Contractors based upon CPCS standing and scores, or for any other reason in Fiscal Year 2012.

400 MARYLAND AVE., S.W., WASHINGTON, DC 20202-4500
www.ed.gov

Our mission is to ensure equal access to education and to promote educational excellence throughout the Nation.

Page 2 -- Ms. Persis Yu
FOIA Request No. 13-01138-F

Your request was forwarded to Federal Student Aid (FSA) within the Department to search for documents that may be responsive to your request.

Enclosed is a CD containing 25 pages of documents responsive to Items 1 and 2 of your request. FSA advises that it has no documents responsive to Item 3. However, certain information has been withheld (including 17 pages in their entirety) according to the FOIA exemption specified below:

- Records or portions of records relating to trade secrets and commercial or financial information is exempt pursuant to 5 U.S.C. § 552 (b)(4) of the FOIA. This provision exempts from disclosure "trade secrets and commercial or financial information obtained from a person [that is] privileged or confidential."

You have the right to appeal this decision by writing to the address below, within 35 days from the date of this letter. Your appeal should be accompanied by a copy of your initial letter of request, this denial letter, and any evidence or argument you wish the Department to consider in making an administrative determination on your appeal.

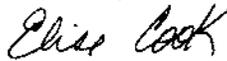
Appeal Address:

U.S. Department of Education
Assistant Secretary for Management
Office of Management
400 Maryland Avenue, SW, LBJ, 2W311
ATTN: FOIA Appeals Office
Washington, DC 20202-4500

Or, you may complete the online FOIA appeal form, located at:
http://www.ed.gov/policy/gen/leg/foia/foia_appeal_form_1.html.

If you have any questions, please contact the FOIA Service Center (FSC) at (202) 401-8365 or EDFOIAManager@ed.gov.

Sincerely,



Elise Cook
FOIA Public Liaison
FOIA Service Center
U.S. Department of Education

Enclosure

400 MARYLAND AVE., S.W., WASHINGTON, DC 20202-4500
www.ed.gov

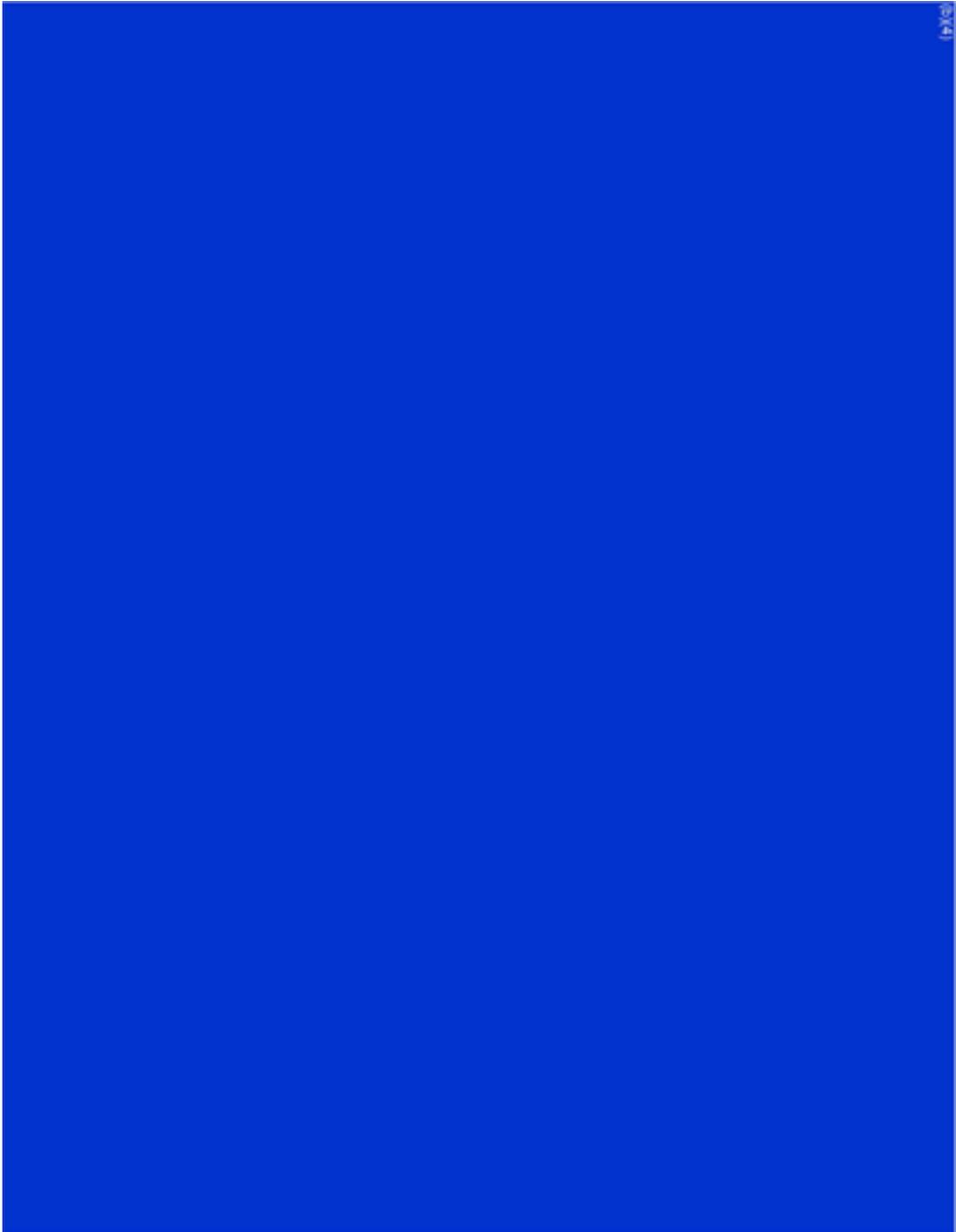
Our mission is to ensure equal access to education and to promote educational excellence throughout the Nation.

CPCS 8 Ranking - Unrestricted Pool

October 1, 2011 - December 31, 2011

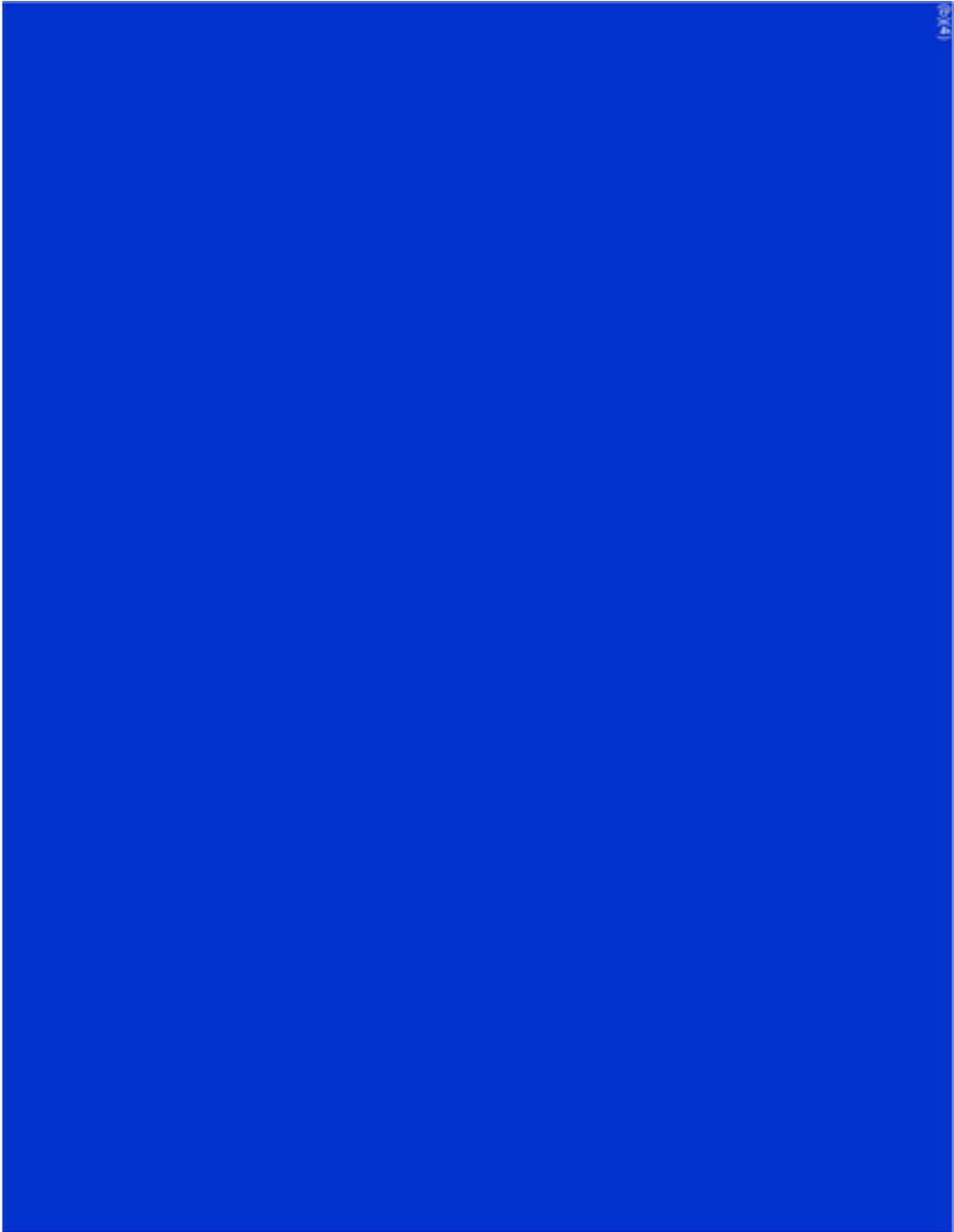
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	(b)(4)
1	PNB INVESTMENT COOP
2	PROBEN CREDIT RECOVERY
3	CONSERVE
4	OC SERVICES LP
5	PREMIER CREDIT OF NORTH AMERICA
6	NCO FINANCIAL SYSTEMS
7	VAN RUI CREDIT COOP
8	PROGRESSIVE FINANCIAL SERVICES
9	SMS
10	PHI (PROBENLY DCSS)
11	BOB-CCA (COLLECTO INC)
12	ACCOUNT CONTROL TECHNOLOGY
13	WINCHAM PROFESSIONALS
14	ALLED INTERSTATE
15	THE CARE GROUP
16	WEST ASSET MANAGEMENT
17	FINANCIAL ASSET MANAGEMENT

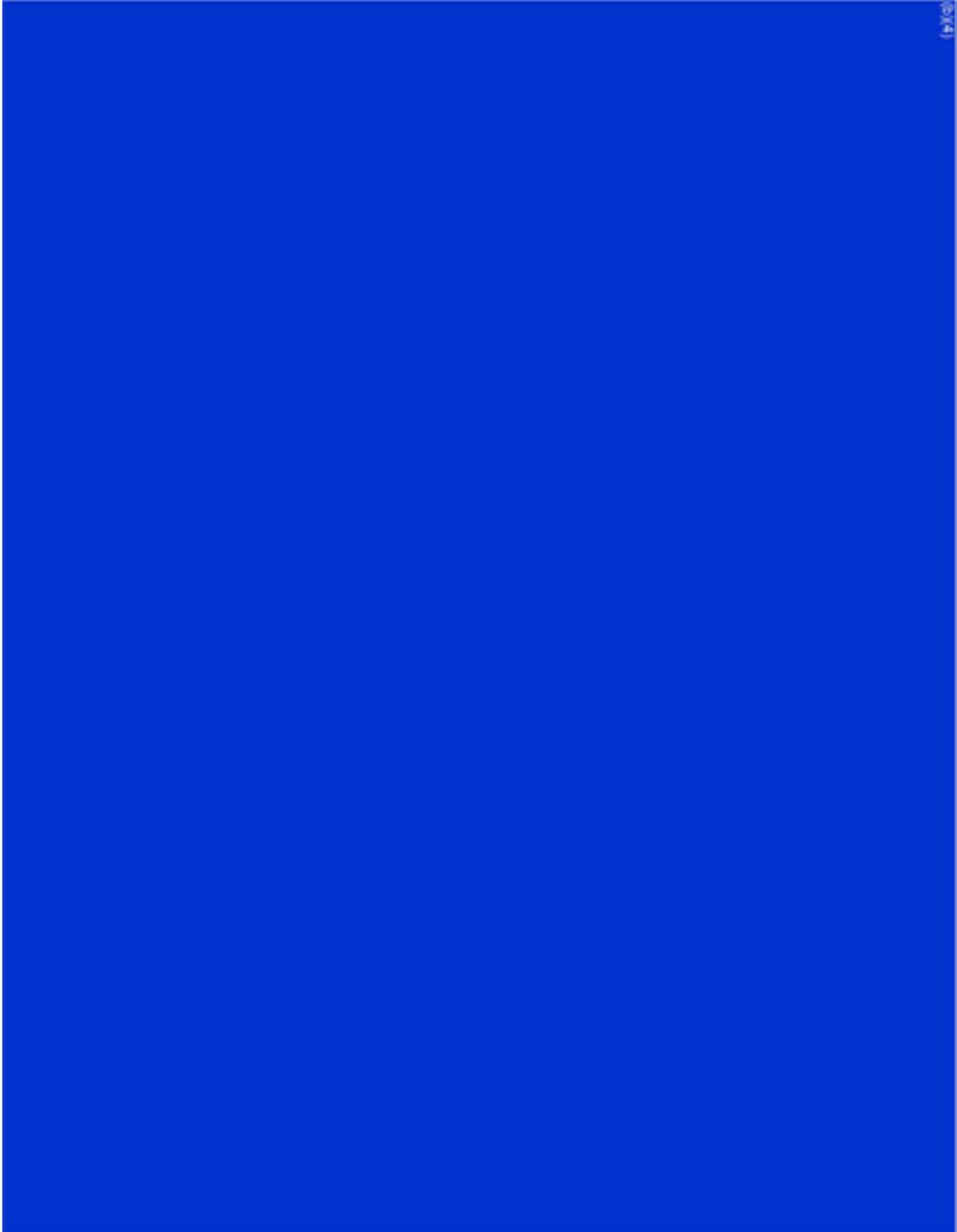


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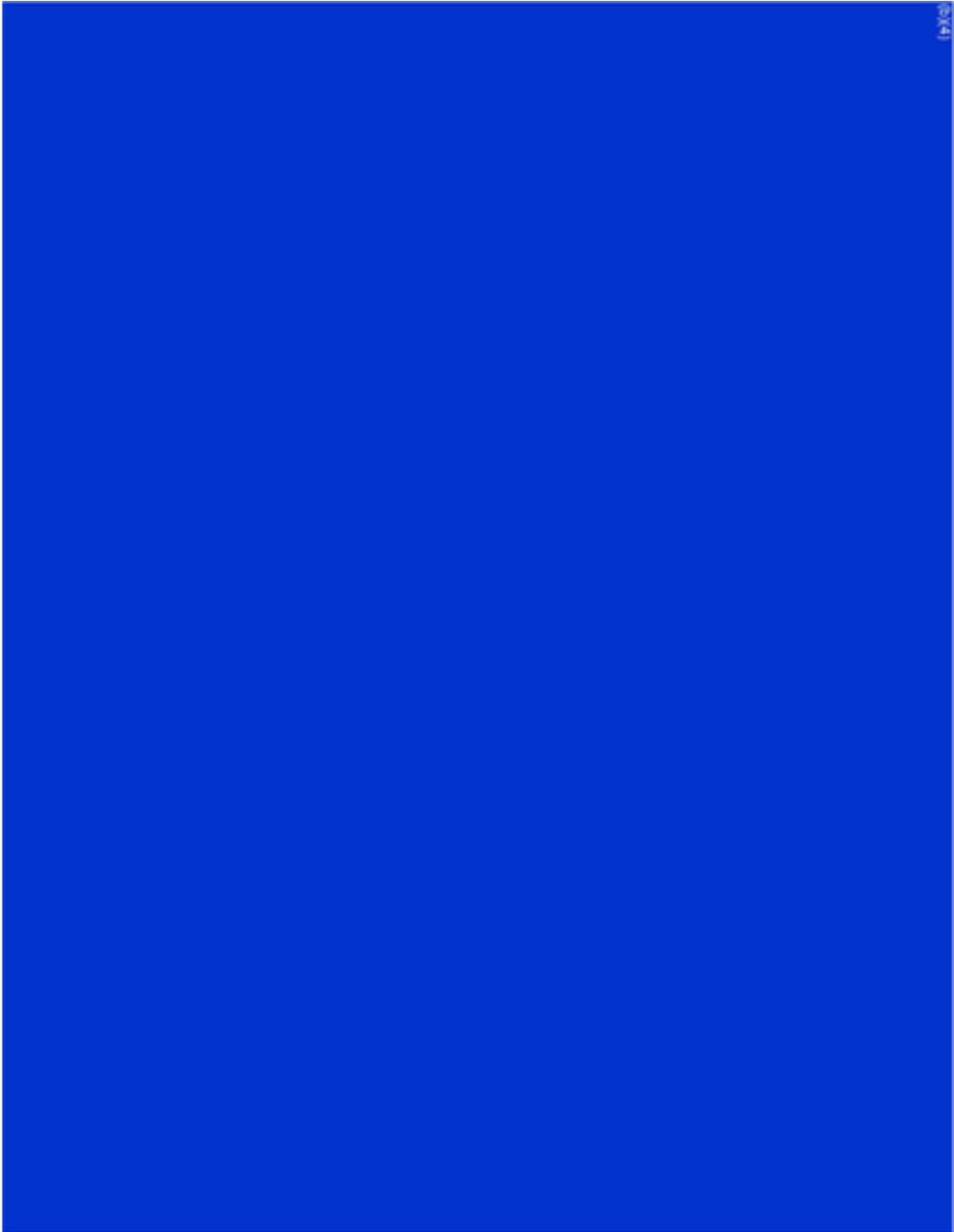


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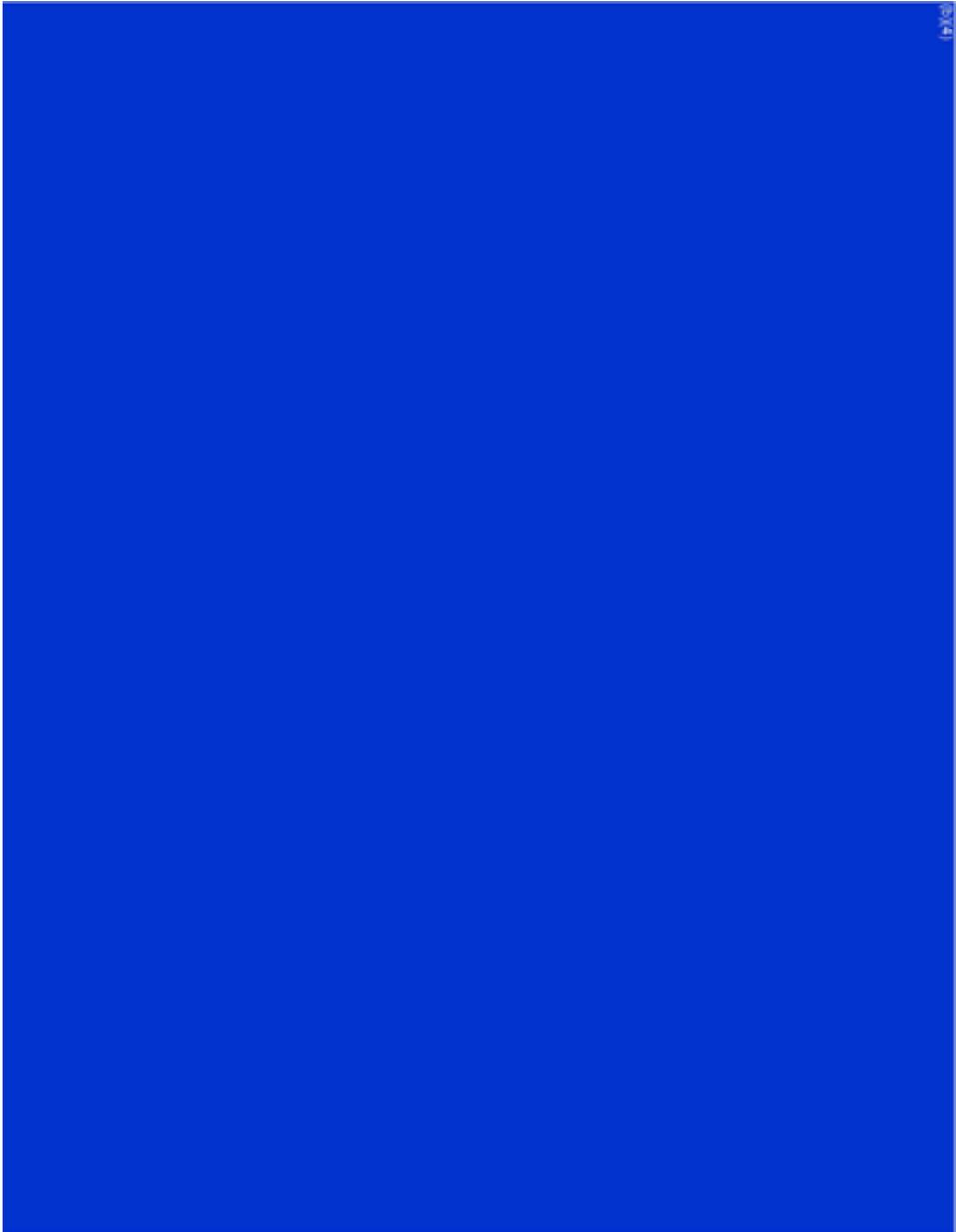


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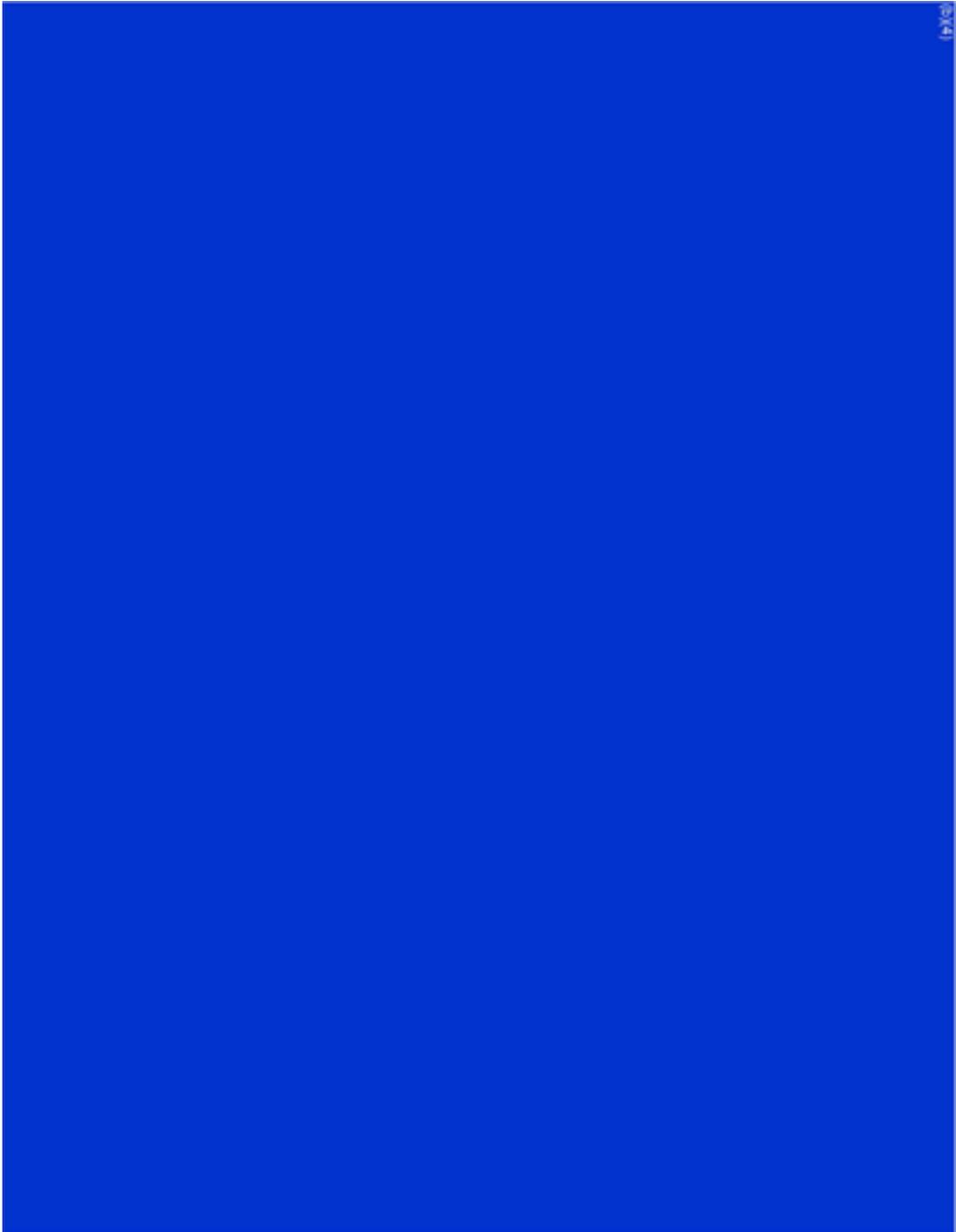


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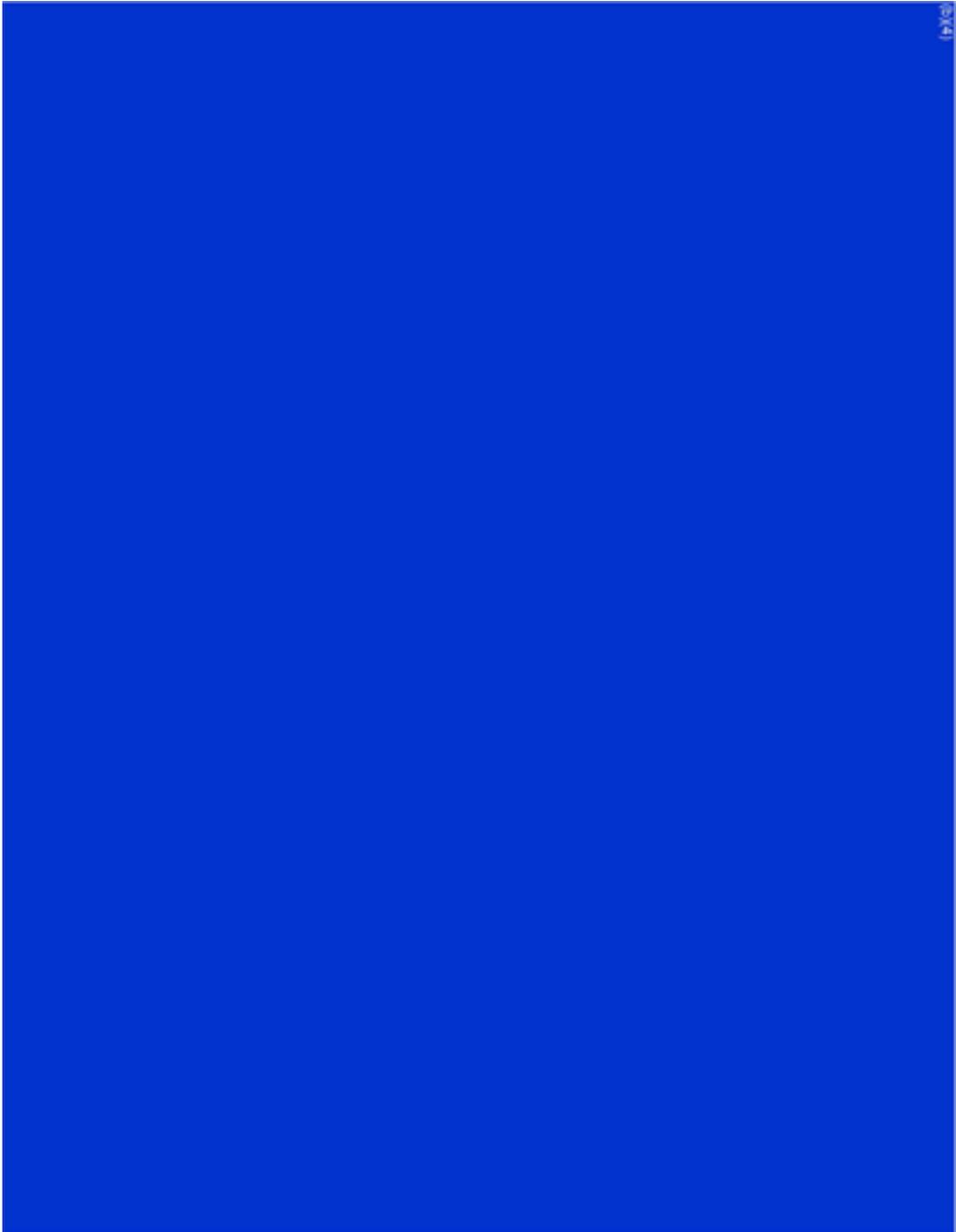


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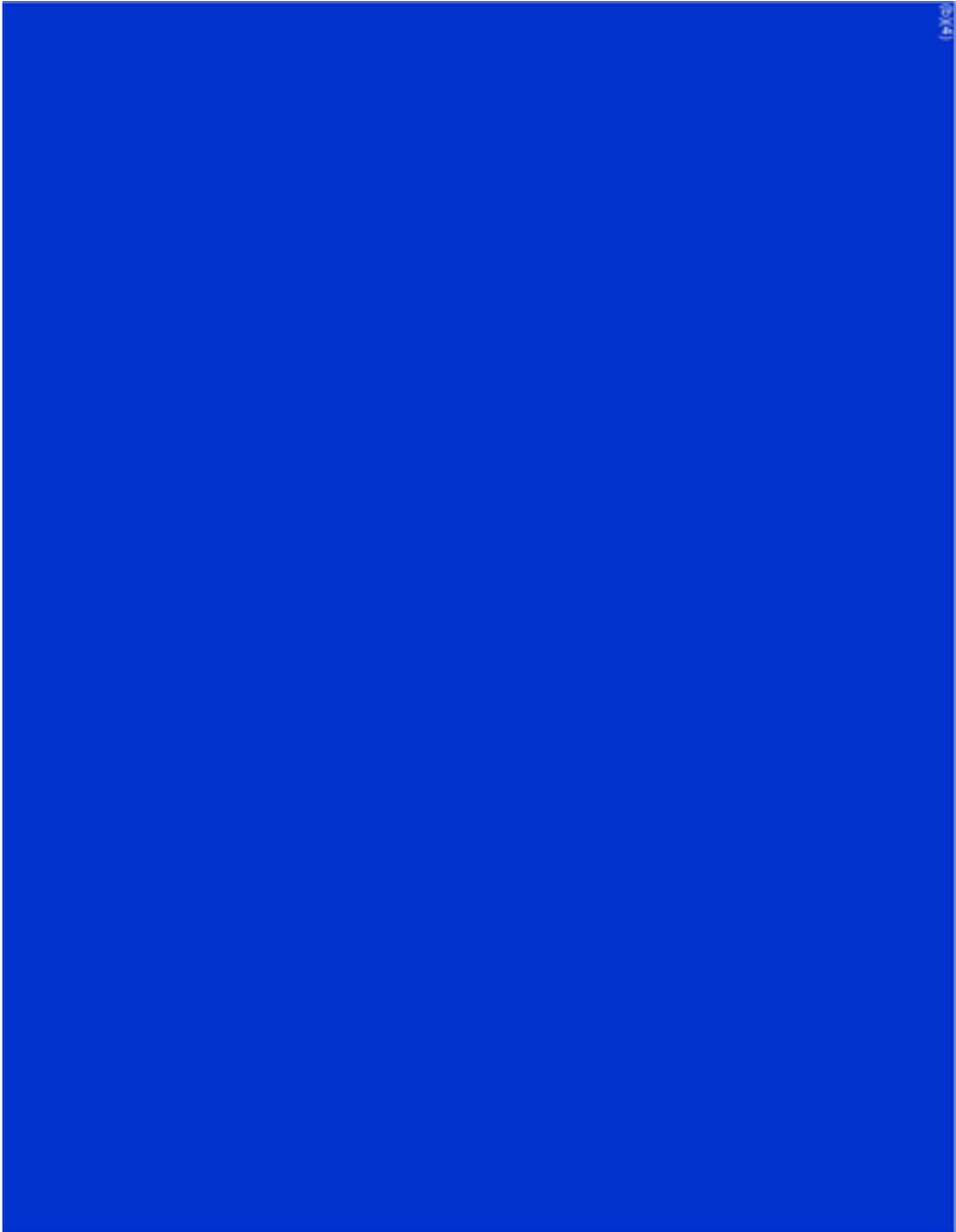
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APPENDIX E

PERFORMANCE SCORES FOR FISCAL FOURTH QUARTER 2012 (JULY–SEPT. 2012)

Released January 2013

The U.S. Competitive Performance and Continuous Surveillance (CPCS) Score is an evaluation by Department of Education that determines how the share of new default accounts will be awarded, with the highest proportion awarded to the contractor with the highest CPCS score. The following table shows the CPCS Score and Dollar Amount Collected for each of the Department of Education's private collection agencies in the fourth quarter of fiscal year 2012 as the information was released in January 2013. In July 2014, following NCLC's Freedom of Information Act request and subsequent lawsuit, the Department of Education disclosed the CPCS Score and Dollar Amount Collected for all of FY 2012 (see Appendix A). Notably, the scores and amount collected for Q4 in that disclosure are different from those released in January 2013.

LARGE UNRESTRICTED CONTRACTORS		
PRIVATE COLLECTION AGENCY	CPCS SCORE	\$\$ COLLECTED
Pioneer Credit Recovery (Sallie Mae)	97.25	\$48,290,070
FMS Investment Corp.	94.63	\$41,605,960
ConServe	93.77	\$44,024,062
NCO Group	92.34	\$40,408,186
Van Ru Credit Corporation	90.85	\$42,299,205
GC Services LP	90.20	\$40,228,861
Premiere Credit of North America	86.99	\$35,413,534
Diversified Collection Services (Performant)	85.38	\$37,117,412
ERS	85.03	\$37,750,077
Progressive Financial Services	83.43	\$30,713,099
Account Control Technology	82.35	\$30,450,572
EOS-CCA(Collecto Inc.)	80.75	\$30,467,792
Allied Interstate (IQor)	79.89	\$31,518,780
Windham Professionals	78.89	\$29,055,468
CBE Group	68.84	\$24,676,897
Financial Asset Management	63.65	\$26,455,895
West Asset Management	60.27	\$20,344,094

SMALL BUSINESS CONTRACTORS

PRIVATE COLLECTION AGENCY	CPCS SCORE	\$\$ COLLECTED
Coast Professional	100.00	\$21,970,309
Collection Technology, Inc.	78.83	\$17,835,486
National Recoveries	73.58	\$13,475,688
Immediate Credit Recovery	73.40	\$13,477,385
Delta Management Associates	61.08	\$11,834,522

Source: Patrick Lunsford, Full Results for ED Debt Collection Contract Q4 2012, *InsideARM* (Jan. 23, 2013).