

LAUNCH ACADEMY HOLDINGS, INC.

INDEPENDENT ACCOUNTANTS' REPORT ON APPLYING AGREED-UPON PROCEDURES

**For the Reporting Period
January 1, 2017 through June 30, 2017
And
July 1, 2017 through December 31, 2017**

LAUNCH ACADEMY HOLDINGS, INC.

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AGL CPA Group, Inc.
Service + Expertise = Value
3525 Piedmont Road, Building 7, Suite 203
Atlanta, GA 30305
<http://aglcpa.com>

INDEPENDENT ACCOUNTANTS' REPORT ON APPLYING AGREED-UPON PROCEDURES

To Management:

We have performed the procedures agreed upon by Launch Academy Holdings, Inc. and management solely to assist Launch Academy Holdings, Inc. with its analysis of their Student Data, Employment Outcome Rate and Graduation Rate for the periods of **January 1, 2017 through June 30, 2017 and July 1, 2017 through December 31, 2017**. Management is responsible for Launch Academy Holdings, Inc.'s Student Data, Employment Outcome Rate and Graduation Rate. This agreed-upon procedures engagement was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants. The sufficiency of these procedures is solely the responsibility of those parties specified in this report. Consequently, we make no representation regarding the sufficiency of the procedures described in our report either for the purpose for which this report has been requested or for any other purpose.

Launch Academy Holdings, Inc. is responsible for the agreed-upon procedures to be performed outlined in Exhibit A and that it is in accordance with applicable standards; and for selecting the criteria and procedures and determining that such criteria and procedures are appropriate for their purposes. Launch Academy Holdings, Inc. is also responsible for, and has provided us in writing regarding the Company's assertions about accuracy and existence of Student Data, Employment Outcome, and Graduation Rates which is presented in accordance with the Council on Integrity in Results Reporting "CIRR" Standards & Implementation Requirements rev. 2018-03-19 "CIRR Standards", which governs outcome reporting for graduates of 2017.

Agreed-upon procedures on Launch Academy Holdings, Inc.'s Student Data, Employment Outcome Rate, and Graduation Rate for Enrolled Students who graduated during the period of January 1, 2017 through June 30, 2017 and July 1, 2017 through December 31, 2017.

Definitions:

- A. Published Course Length:** For fixed-length programs, the Published Course Length must be in calendar days such that the following statement is true: If a student needs to repeat a module/section prior to meeting the graduation criteria, he or she should not count as graduated in 100% of the program length.
- B. Employment Outcome Rate** – Calculated based on dividing (i) the number of graduates available for employment who accepted an offer of gainful employment within 90 and 180 days of graduation by (ii) the number of graduates available for employment. The Employment Outcome Rate is calculated as an aggregate number for all graduates of the Fundamentals of Web Development program.
- C. Graduates**– Calculated based on the number of students who have successfully completed the requirements for graduation notated in Exhibits B and C. Students who successfully completed the requirements are eligible for graduation.

Definitions (continued):

- D. Employed** – Calculated based on the number of students who accepted offer of employment within 90 and 180 days of graduation. The following graduates are considered Employed:
- i. Graduates employed by Launch Academy Holdings, Inc. as an instructor or other technical position.
 - ii. Graduates who return to their previous employer if the position is a role relevant to the Launch Academy Holdings, Inc. curriculum.
 - iii. Graduates who accept a full-time, part-time, or contract position in a role relevant to the Launch Academy Holdings, Inc. curriculum.
 - iv. Graduates who start their own business in a founder role (entrepreneurs).
- E. Non-Reporting** – Calculated based on the number of graduates who did not respond to a minimum of four attempts through two different means of communication.
- F. Enrolled Students** – Enrolled students are all students in a course as of (i) the final date under applicable state regulations on which the school is required to provide the student with a full tuition refund, or (ii) if applicable state regulations do not contain such a requirement, the final date as specified in the school’s published policies on which a student may receive a full tuition refund. The full tuition refund may exclude nominal non-refundable registration fees. Enrolled Students do not include students who became deceased or incarcerated, or were called into active military duty during the course.

DISCLOSURE:

1. ***Per the published CIRR standards “If a student transfers to a later cohort, they are only counted in the graduation rate for their first cohort, and not for the later one”.*** However, this student is included in the Employment Outcomes of their graduating cohort. Accordingly, these student are included in the graduation rate and excluded from the employment outcomes during the period of January 1, 2017 through June 30, 2017 and July 1, 2017 through December 31, 2017.

Procedures Performed and Results:

1. Verify the number of students who were enrolled in the program and if the student graduated within 100% and 150% of the published course length of 130 and 142 days during the period of January 1, 2017 through June 30, 2017 and July 1, 2017 through December 31, 2017, respectively.
 - a. Obtain the list of students who are designated as enrolled, per Launch Academy Holdings, Inc.'s records for the period from January 1, 2017 through June 30, 2017 and July 1, 2017 through December 31, 2017.
 - b. Verified independently directly with the student, or alternatively through the procedures listed below, that students designated as "graduated" completed the program within 100% or 150% of the published course length of 130 and 142 days. The listed alternative procedures are as follows:
 - i. Examination of graduation attestation or written record.
 - ii. Examination of school records representing the student graduated such as email communication, offer letters or other student data.
 - iii. Examination of professional or company web-sites.

Results: AGL CPA Group, LLC obtained an enrollment list of 189 students, 189 of which are eligible to be included in the Graduation Rate calculation. (See Disclosure 1 and Exhibits B and C)

AGL CPA Group, LLC verified that 98 of 189 or 52% of enrolled students graduated within 100% of the published course length of 130 or 142 days. The remaining 91 of 189 or 48% of enrolled students did not graduate. No exceptions were noted. (See Disclosure 1 and Exhibits B and C)

AGL CPA Group, LLC verified 69 of 98 or 70% of graduates through independent email verification with the graduate. The remaining 29 of 98 or 30% of graduates were verified through one or more alternative procedures described in section 1.B above (See Disclosure 1 and Exhibits B and C)

2. Verify the number of graduates who were employed as defined by Definition C and D.
 - a. Using the list obtained in procedure 1.A, verify independently directly with the student, or alternatively verify through the procedures listed below, the Employment Outcome provided by Launch Academy Holdings, Inc. for each student who was designated as a graduate as defined by Definitions B, C, and D. The listed alternative procedures are as follows:
 - i. Examination of signed offer letter from employer.
 - ii. Examination of school records representing the student graduated such as email communication, offer letters or third party professional web-sites, graduate attestation, or documented detail communication with the student/employer.
 - b. Using the verified number obtained from procedure 2.a above, recalculate the January 1, 2017 through June 30, 2017 and July 1, 2017 through December 31, 2017 Employment Outcome Rate as defined by Definition B.

Results: AGL CPA Group, LLC verified that 88 of 98 or 90% of graduates which are eligible to be included in the Employment Outcomes Rate calculation were employed within 180 days of graduation. The remaining 10 of 98 or 10% of graduates which are eligible to be included in the Employment Outcomes Rate calculation were not employed or non-reporting within 180 days of graduation. No exceptions were noted. (See Disclosure 1 and Exhibits B and C)

Procedures Performed and Results (continued):

Results (continued): AGL CPA Group, LLC verified Employment Outcome for 61 of 88 or 69% of graduates who received and reported an offer of employment by independent email verification with the graduate, 27 of 88 or 31% were verified through one or more alternative procedures defined in section 2.A above. (See Disclosure 1 and Exhibits B and C)

See Exhibits B and C for the recalculated verified Employment Outcome Rate for the periods of January 1, 2017 through June 30, 2017 and July 1, 2017 through December 31, 2017. (See Disclosure 1 and Exhibits B and C)

3. Verify the number of graduates who accepted an offer of employment and reported salary information to the school.
 - a. Using the list obtained in procedure 1.A and the verified information in section 2 verify independently directly with the student, or alternatively verified through the procedures listed below, the salary information for graduates who were designated as employed as defined by Definition C and D, provided by Launch Academy Holdings, Inc., for each graduate. The listed alternative procedure is as follows:
 - i. Examination of signed offer letter from employer.
 - ii. Examination of school records representing the students salary such as email communication, offer letters or documented detail communication with the student/employer.
 - b. For the graduates who provided salary information through applicable documentation, calculate the median annual base salary for graduates for the 90 and 180 day window.

Results: AGL CPA Group, LLC verified independently directly with the student, or alternatively verified through the procedures described in section 3.A, the reported and median salary for 67 of 67 or 100% and cumulative 88 of 88 or 100% of graduates who accepted an offer of employment and reported salary for the 90 and 180 day window, respectively. (See Disclosure 1 and Exhibits B and C)

See Exhibits B and C for the recalculated verified median salary for the period of January 1, 2017 through June 30, 2017 and July 1, 2017 through December 31, 2017 (See Disclosure 1 and Exhibits B and C)

We were not engaged to, and did not, conduct an examination, the objective of which would be the expression of an opinion on the effectiveness of Launch Academy Holdings, Inc. internal control over compliance.

Accordingly, we do not express such an opinion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

This report is intended solely for the information and use of the Launch Academy Holdings, Inc. and Management and is not intended to be and should not be used by anyone other than these specified parties.

Atlanta, GA
April 1, 2019

SUPPLEMENTAL EXHIBITS

EXHIBIT A

AGREED UPON PROCEDURES

Management asserts the Outcome Report provided for presentation is accurate and in compliance with CIRR standards and the following reported results:

Management Objective	Assertion	Procedure Description
All enrolled students who were included in the CIRR Outcomes Report. Including, students that were enrolled during the reporting period and included in the underlying data used for reporting results of the CIRR Outcomes Report.	Existence and Accuracy	AGL CPA Group, LLC ("AGL") will obtain from management a list of students who are designated as enrolled, per the published CIRR Standards, in the program for the periods January 1, 2017 through June 30, 2017 and July 1, 2017 through December 31, 2017, and perform the following procedures to test existence and accuracy.
		AGL will verify enrollment with the student through confirmation. For those students who don't respond, one of the following alternative methods of verification will be preformed or obtained: a) graduation attestation or written record; b) school records representing the student graduated such as email communication, offer letters or other student data; c) professional or company web-sites.
The number of students who were enrolled in the program and presented in the CIRR Outcomes Report that graduated are used in calculating the percentage of students who graduated within 100% and 150% of the published course length is accurate and proper documentation, as defined by the CIRR Standards, has been retained for verification purposes.	Existence, Classification and Accuracy	AGL will verify graduation date with the student through confirmation. For those students who don't respond, one of the following alternative methods of verification will be preformed or obtained: a) graduation attestation or written record; b) school records representing the student graduated such as email communication, offer letters or other student data; c) professional or company web-sites.
The number of students employed within 90 days and cumulatively within 180 days after graduation are reported in the CIRR Outcome Report accurately and proper documentation, as defined by the CIRR Standards, has been retained for verification.	Existence, Classification and Accuracy	AGL will verify the student was employed as stated in the employment calculation with the student through confirmation. For those students who don't respond, one of the following alternative methods of verification will be preformed or obtained: a) signed offer letter from employer; b) school records representing the student graduated such as email communication, offer letters or third party professional web-sites, graduate attestation, or documented detail communication with the student/employer.
The graduates that report salary's after employment are accurate and relate to the proper reporting period, as defined by the CIRR Standards.	Existence, Classification and Accuracy	AGL will verify the student's salary as stated in the Outcome Report through confirmation. For those students who don't respond, one of the following alternative methods of verification will be preformed or obtained: a) examine singed offer letter from employer, b) school records representing the students salary such as email communication, offer letters or documented detail communication with the student/employer.

EXHIBIT B
CIRR SCHEDULE OF OUTCOME DATA FOR
FUNDAMENTALS OF WEB DEVELOPMENT, BOSTON
CAMPUS
JANUARY 1, 2017 THROUGH JUNE 30, 2017

I. Report Information		
School Name	Launch Academy	
Campus Location	77 Summer Street, Boston, MA	
Program Name	Fundamentals of Web Development	
Reporting Period	1/1/2017	6/30/2017
Published Course Length (in days, including weekends and holidays)	142	
Graduates Included in Report	56	
II. Graduation Requirements		
- Student must achieve a minimum of 12 technical points		
- Student must achieve a minimum of 10 career service points		
III. Graduation Data		
How many students graduate within 100% of published program length (on-time)?	57.73%	
How many students graduate within 150% of published program length	57.73%	
IV. What were the employment results for graduates?		
	90 days	180 days
1. Employed full-time in paid, in-field positions	60.7%	82.1%
A. Full-time employee	42.9%	53.6%
B. Full-time apprenticeship, internship, or contract position	16.1%	26.8%
C. Hired by school in-field	1.8%	1.8%
2. Employed in other positions	0.0%	3.6%
A. Started a new company or venture after graduation	0.0%	0.0%
B. Short-term contract or part-time position	0.0%	3.6%
C. Hired by school out of field	0.0%	0.0%
D. Out of field	0.0%	0.0%
3. Not employed	39.3%	14.3%
A. Still seeking a job	39.3%	14.3%
B. Not seeking a job	0.0%	0.0%
4. Non-reporting	0.0%	0.0%
What is the median annual base salary of graduates?	\$65,000	\$61,950
Under \$40,000	14.7%	16.7%
\$40,000-49,999	2.9%	10.4%
\$50,000-59,999	14.7%	16.7%
\$60,000-69,999	38.2%	33.3%
\$70,000-\$79,999	20.6%	16.7%
\$80,000+	20.6%	6.3%
Percentage of job obtainers who reported salaries	100.0%	100.0%
V. What were the most frequent job titles for graduates?		
Junior Software Engineer	5.3%	
Software Engineer	5.3%	
Junior Software Developer	5.3%	
Junior Developer	3.5%	
Web Developer Apprentice	3.5%	
VI. What percent of incoming students held a prior computer science degree?	Did not report on	

EXHIBIT C
CIRR SCHEDULE OF OUTCOME DATA FOR
FUNDAMENTALS OF WEB DEVELOPMENT, BOSTON
CAMPUS
JULY 1, 2017 THROUGH DECEMBER 31, 2017

I. Report Information		
School Name	Launch Academy	
Campus Location	77 Summer Street, Boston, MA	
Program Name	Fundamentals of Web Development	
Reporting Period	7/1/2017	12/31/2017
Published Course Length (in days, including weekends and holidays)	130	
Graduates Included in Report	42	
II. Graduation Requirements		
<ul style="list-style-type: none"> - Student must achieve a minimum of 12 technical points - Student must achieve a minimum of 10 career service points - Student must achieve a minimum of 50 post-Career Kickoff points 		
III. Graduation Data		
How many students graduate within 100% of published program length (on-time)?	43.30%	
How many students graduate within 150% of published program length	43.30%	
IV. What were the employment results for graduates?		
	90 days	180 days
1. Employed full-time in paid, in-field positions	78.6%	92.9%
A. Full-time employee	59.5%	69.0%
B. Full-time apprenticeship, internship, or contract position	16.7%	21.4%
C. Hired by school in-field	2.4%	2.4%
2. Employed in other positions	0.0%	2.4%
A. Started a new company or venture after graduation	0.0%	0.0%
B. Short-term contract or part-time position	0.0%	0.0%
C. Hired by school out of field	0.0%	0.0%
D. Out of field	0.0%	2.4%
3. Not employed	21.4%	4.8%
A. Still seeking a job	21.4%	4.8%
B. Not seeking a job	0.0%	0.0%
4. Non-reporting	0.0%	0.0%
What is the median annual base salary of graduates?	\$65,000	\$65,000
Under \$60,000	24.2%	25.0%
\$60,000-69,999	30.3%	27.5%
\$70,000-79,999	30.3%	35.0%
\$80,000-89,999	6.1%	5.0%
\$90,000-\$99,999	9.1%	7.5%
\$100,000+	9.1%	0.0%
Percentage of job obtainers who reported salaries	100.0%	100.0%
V. What were the most frequent job titles for graduates?		
Junior Software Engineer	19.0%	
Software Engineer	11.9%	
Cloud Solutions Engineer	0.0%	
Data Engineer	2.4%	
Junior Engineer	2.4%	
VI. What percent of incoming students held a prior computer science degree?		
	Did not report on	