

Greenhouse Gas Inventory Methodology Report

CY 2025 Inventory

Prepared for:

American Public Education, Inc.

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1. General Information

Sundowner Sustainability Consulting, LLC (Sundowner) was contracted by American Public Education, Inc. (APEI) to compile their greenhouse gas (GHG) inventory for the calendar year (CY) 2025, spanning January 1 to December 31, 2025. This inventory has been prepared in accordance with the World Resources Institute Greenhouse Gas Protocol Corporate Accounting and Reporting Standard¹ (WRI GHG Protocol) and Scope 2 Guidance, and follows the protocol and technical guidance of the WRI GHG Protocol Corporate Value Chain (Scope 3) Accounting and Reporting Standard for the Scope 3 categories reported. The WRI Protocol is built on five financial accounting and reporting principles: Relevance, Completeness, Consistency, Transparency, and Accuracy.

Scope 1 and Scope 2 emissions are reported, along with emissions from the following upstream Scope 3 categories: Employee Commuting, Business Travel, and Waste Generated in Operations. Where appropriate, energy use (in kWh) has also been included for transparency purposes. The following tables contain a summary of total greenhouse gas emissions (Table 1) and energy use (Table 2).

Table 1: CY 2025 Greenhouse Gas Emissions Summary

Emissions Source	CY 2025 Emissions (metric tons CO ₂ e)
Scope 1 Emissions	
Stationary combustion	1,113.68
Mobile emissions	1.57
Fugitive emissions	229.18
Subtotal	1,344.43
Scope 2 Emissions - Location-based	
Electricity	4,234.56
Scope 2 Emissions -Market-based	
Electricity	3,828.88
Total Scope 1 and 2: Location-Based Emissions	5,578.98
Total Scope 1 and 2: Market-Based Emissions	5,173.31
Scope 3 Emissions	
Employee Commuting	2,123.76
Business Travel	619.17
Air	385.64
Rail	2.81
Vehicle	230.71
Waste Disposal	268.51
Landfilled	262.09
Recycled	6.41

¹ <https://ghgprotocol.org/corporate-standard>

Table 2: CY 2025 Energy Use

Emissions Source	CY 2025 Energy Consumed (kWh)	Percent of energy consumed
Scope 1 Emissions		
Stationary combustion	6,144,965	36.89%
Mobile emissions	6,532	0.04%
Fugitive emissions	n/a	n/a
Subtotal	6,151,497	36.93
Scope 2 Emissions (Location-Based)		
Electricity – Non-Renewable	10,507,451	63.07%
Electricity – Renewable ¹	0	0%
Total Scope 1 and Location-Based Scope 2 Emissions	16,658,948	100%
Note 1: APEI is not eligible to claim renewable energy generated from their solar arrays because they sell the environmental attributes to this power.		

All Kyoto greenhouse gases are included in the reporting scope (CO₂, CH₄, N₂O, HFCs, PFCs, SF₆ and NF₃) though APEI does not emit PFC's, SF₆ or NF₃. Emissions data is reported in metric tons of carbon dioxide equivalent (tCO₂e), using GWPs from the IPCC Fifth Assessment Report (AR5), consistent with the latest release of the EPA Center for Corporate Climate Leadership Emission Factors for Greenhouse Gas Inventories, and the previous inventory. Many companies have transitioned to using the next assessment report, AR6. Sundowner evaluated the change in emissions and determined that the differences would be negligible and therefore chose to continue with AR5 for continuity and continued consistency with EPA's current publication.

All categories consist of a mix of actual and estimated data depending on site availability and the form of the data available. Estimation methods were only used when actual invoiced or metered data was not available, as described in further detail in each section of this report. This document summarizes the data sources and methods used to prepare APEI's GHG inventory.

1.1 Reporting Boundaries

APEI reports GHG emissions reports using the Operational Control reporting methodology, meaning APEI has the authority to implement policies and procedures that impact energy consumption. The inventory only includes sites that were operated by APEI during 2025. For sites that were occupied for part of the year, emissions were pro-rated to reflect the appropriate time period.

To meet the WRI Protocol's Completeness Principle, emissions were estimated for facilities for which known consumption data was not available. Electricity and natural gas intensity factors (in kWh/square foot and scf/square foot) are taken from the U.S Energy Information Administration (EIA) Commercial Building Energy Consumption Survey (CBECS), 2018 data, last updated December 2022. This continues to be the most recent CBECS building intensity data available.

A breakdown of emissions by division has been provided in the conclusion section at the end of this report. Sites active in calendar year (CY) 2025 are provided in Appendix A.

1.2 Base Year

The GHG Protocol requires that reporters select a base year in order to allow for consistent, meaningful comparisons of “like for like” data, over time. This allows the reporter to establish GHG targets and track progress.

On September 21, 2021, APEI completed the acquisition of Rasmussen University, adding 18,000 students across 24 campuses in six states to its overall network. To account for the significant changes resulting from this transformative acquisition, APEI shifted its base year for sustainability reporting to CY 2022, as it is now the earliest year with complete and reliable data for most of its campuses.

Reporters are also required to document the situations that will trigger a base-year recalculation.

There are certain situations which require a base year recalculation per the WRI Protocol, pg. 35. These situations include the following:

- Structural changes in the organization, (e.g., the transfer of ownership of emissions generating activities to another organization). This includes mergers, acquisitions, divestitures, and outsourcing or insourcing of emitting activities.
- Changes in calculation methodology or improvement in accuracy of emission factors or activity data.
- Discovery of significant errors, or a number of errors that cumulatively have a significant impact.

The base year is to be recalculated if any of the above situations, either individually or combined, result in a significant difference, with significance determined by the reporter. APEI has set the significance threshold as causing an impact of more than 10% when compared to total combined Scope 1 and 2 emissions. Organic growth or decline does not trigger baseline recalculation.

APEI sold two of their APUS Charlestown buildings in CY2025. These two sites contribute 11% of emissions in the base year, which does trigger recalculation.

Removing these sites from the base year next year will improve comparisons of emissions reductions between the CY 2026 inventory and the CY 2022 base year, since the CY 2026 inventory will not include emissions from these two locations.

The other closed sites were considered organic growth/decline rather than divestitures. This assumption may need to be re-evaluated to ensure proper baseline recalculation.

2. Direct Emissions: Scope 1

Scope 1 emissions are emissions that occur as a direct result of the reporter's operations. For APEI, this is from combustion of petroleum-based fuels, and fugitive emissions from air conditioning. Emissions were calculated using emission factors obtained from the United States EPA Center for Corporate Climate Leadership² Emission Factor Hub, January 2025 release. There have not been any updates to the published Scope 1 emission factors, but no changes were expected for emission factors for fuel combustion. Fuel energy content in published emission factors does not usually change from year to year.

2.1 Stationary Combustion

APEI's stationary combustion emissions come from natural gas and diesel fuel (distillate fuel #2) used in emergency generators. Prior year inventories also included propane, but this space was reported as vacant in 2024. No diesel fuel was purchased by APUS in 2025, so emissions are reported as zero. HCN, Rasmussen and GSUSA do not have operational control of emergency generators, so diesel is not reported for these divisions.

Natural gas was the only contributor to stationary combustion in CY2025. This data is obtained from monthly invoices or estimated based on square footage when data is not available. For the 2025 inventory, Sundowner was provided metered consumption data for 12 sites, and estimated consumption for the rest. Currently 17 sites have natural gas emissions, either from actual data or estimated. The rest (including all APUS and GSUSA sites) are considered to be all electric based on landlord survey data provided for the 2022 inventory.

Table 3: Stationary Combustion

Fuel Type	Energy (kWh equivalent)	Emissions (mt CO₂e)
Natural Gas	6,144,965	1,114
Diesel (#2)	0	0
Total	6,144,965	1,114

Natural gas consumption was provided for the White Pond Drive site in Akron but is estimated for all other HCN sites. HCN did not have any partial year estimates. Rasmussen locations provide utility data for 12 sites. The Twin Cities site that closed in September was estimated (the landlord pays gas at this site) and then pro-rated as active through September 2025.

Table 4: Natural gas consumption by division

Totals:	Consumed energy MMBtus of Natural Gas	Consumed energy kWh equivalent	GHG Emissions Metric Tons CO₂e
APUS	0	0	0
HCN	6,972	2,043,332	370
RAS	13,995	4,101,633	743
GSUSA	0	0	0
Total	20,967	6,144,965	1,114

² <https://www.epa.gov/climateleadership/center-corporate-climate-leadership-ghg-emission-factors-hub>

2.2 Mobile Combustion

APEI operates a small fleet of gasoline-powered vehicles, all of which are housed at the APUS campus in Charles Town, WV.

Fuel spend data was used to calculate gallons of fuel consumed using a published value for average dollars per gallon of gasoline purchased for the Lower Atlantic (PADD IC) in 2025, published by the EIA³. Emission factors were then applied to the fuel quantity. Emissions from CH₄ and N₂O were estimated based CO₂ emitted from known gallons combusted using an emissions ratio published by The Climate Registry⁴.

A little over \$500 in fuel purchases were provided, which, assuming around \$3 dollars per gallon for the region, came to less than 200 gallons, about 1.5 mt CO₂e. We will continue to include mobile emissions for completeness despite their minimis contribution.

2.3 Fugitive Emissions

Refrigerants have a large impact on climate change due to their high GWPs. Tracking this source (such as at the Charles Town Campus) provides the most accurate data. APUS Charles Town has a licensed HVAC technician on staff to handle all equipment charging and refrigerant recovery and provides actual data regarding refrigerant leaks and HVAC equipment recharge quantities. APEI reports emissions from fugitive refrigerants when the system is recharged. Four APUS sites, and four RAS sites had equipment recharged in 2025. The refrigerant types added were R-410A for all RAS sites and 3 APUS sites, and R-407C at the IT center, Building 303. The site leased to CDU also had refrigerant charge but this is not included in APEI's inventory.

HCN does not have operational control over the HVAC in the building where they rent office or classroom space and therefore fugitive emissions from air conditioning were not reported for Hondros facilities.

With only two vehicles remaining after selling 3 vehicles in 2023, estimated emissions are calculated as less than 1 mt CO₂e with an assumed 20% leakage rate per year, therefore it was determined that this emissions source is no longer relevant to the inventory.

Refrigerant charge in buildings is provided in the table below. Routine maintenance and leak detection are recommended for minimizing emissions from building air conditioning systems. Tracking charge by site year over year can aid in identifying leaks.

Table 5: Refrigerant Charge History for APUS Charles Town and Rasmussen (lbs. added)

Facility	Address	Square Footage	Refrigerant HFC	CY2020 Lbs. added	CY2022 Lbs. added	CY 2023 Lbs. added	CY 2024 Lbs. added	CY 2025 Lbs. added
Finance Center	393 N. Lawrence Street	105,000	R 410A	64.45	0	140	34	32
Academics	330 North George Street	45,000	R 410A	51.25	0	0	0	72

³ https://www.eia.gov/dnav/pet/pet_pri_gnd_a_epm0_pte_dpgal_a.htm

⁴ <https://theclimateregistry.org/wp-content/uploads/2023/06/2023-Default-Emission-Factors-Final.pdf>



Facility	Address	Square Footage	Refrigerant HFC	CY2020 Lbs. added	CY2022 Lbs. added	CY 2023 Lbs. added	CY 2024 Lbs. added	CY 2025 Lbs. added
IT Center	303 West Third Avenue	38,200	R-407C	0	0	36	0	19
Etter Hall (HR)	111 West Congress Street	10,432	R 410A R-407C	0	0	0	10	0
Security Office	216 South George Street	5,400	R 410A	0	0	0	0	22
Facilities Storage	406 South Buchanan Ranson	6,300	R 410A	0	0	0	0	0
RAS-CPO RAS005	16418 State Road 54, Odessa, FL 33556	26,600	R 410A	n/a	n/a	5	105	17
RAS-North Orlando RAS021	385 Douglas Avenue, Suite 1000, Altamonte Springs, FL 32714	21,612	R 410A	n/a	n/a	12	0	14
RAS Ocala Nursing RAS023	1227 SW 17th Avenue, Ocala, FL 34471	28,673	R 410A	n/a	n/a	n/a	n/a	28
RAS-STC RAS028	226 Park Avenue South, St Cloud, MN 56301	22,488	R 410A	n/a	n/a	42	0	0
FGO RAS010	4012 19th Avenue South, Fargo, ND 58103	18,000	R 410A	0	0	0	9	0
MKO RAS017	1400 Madison Avenue, Mankato, MN 56001	16,321	R 410A	0	0	0	15	48

3. Indirect Emissions: Scope 2

Indirect emissions constitute emissions that are a consequence of the activities of the reporting entity but occur at sources owned or controlled by another entity (i.e., utility). Indirect, or Scope 2 emissions include purchased electricity, purchased steam, and purchased heating and cooling (i.e., district heating and district cooling). APEI does not purchase steam, heating or cooling.

Electricity use at APUS's IT center (303) and Facilities storage (406) both increased significantly. Electricity consumption at 406 has more than doubled since 2020. RAS has 5 sites with significant (approx. 10% or higher) increases in kWh from the previous year.

A comparison of kWh usage (metered electricity obtained from the grid) over the past 5 years is provided in the table below. Note that solar energy generated and consumed on site is not included in this table, and is discussed in the following section.

Table 6: Year to Year Change in Electricity Consumption for APUS, HCN and Rasmussen sites with full year of known data

Facility	Address	Square Footage	CY2020 kWh Consumption	CY2022 kWh Consumption	CY2023 kWh Consumption	CY2024 kWh Consumption	CY2025 kWh Consumption	% change from previous year
Finance Center (Grid Electricity)	393 N. Lawrence Street	105,000	825,148	804,743	750,560	784,716	425,707	n/a sold 6/2025
Academics (Grid Electricity)	330 North George Street	45,000	354,604	332,700	323,700	307,800	153,600	n/a sold 6/2025
IT Center	303 West Third Avenue	38,200	823,441	801,457	769,306	792,385	868,583	9.6%
Etter Hall (HR)	111 West Congress Street	10,432	152,800	164,960	129,920	141,440	114,000	-19.4%
Security Office	216 South George Street	5,400	93,090	83,812	79,812	74,278	76,019	2.3%
Facilities Storage	406 South Buchanan Ranson	6,300	23,717	32,413	32,606	35,850	49,019	36.7%
HCN Akron	755 White Pond Drive, Akron, OH 44320	17,510	n/a	218,593	202,773	217,203	176,474	-18.8%
HCN Cleveland	5005 Rockside Rd. Suite 130, Independence	22,120	n/a	233,715	234,878	Actual data not provided	Actual data not provided	n/a
HCN Indianapolis	3500 Depauw Boulevard, Suite 1070, Indianapolis	20,270	n/a	21,927	18,673	Actual data not provided	Actual data not provided	n/a
RAS- AUR	2363 Sequoia Dr, Aurora, IL 60506	20,910	n/a	114,025	127,508	124,409	131,264	5.5%
RAS- BMT	4400 W 78th St, Suite 600, Bloomington, MN 55435	30,384	n/a	221,657	188,717	169,882	193,205	13.7%
RAS- CPO	16418 State Road 54, Odessa, FL 33556	45,555	n/a	366,854	382,977	413,645	408,806	=1.2%



Facility	Address	Square Footage	CY2020 kWh Consumption	CY2022 kWh Consumption	CY2023 kWh Consumption	CY2024 kWh Consumption	CY2025 kWh Consumption	% change from previous year
RAS- OBK	1415 West 22nd Street, Suite 400, Oak Brook, IL 60523	17,301	n/a	76,147	63,510	42,401	Site closed	n/a
RAS- FGO	4012 19th Avenue South, Fargo, ND 58103	18,000	n/a	176,600	162,880	229,160	216,000	-5.7%
RAS- GRB	904 South Taylor Street, Suite 100, Green Bay, WI 54303	20,000	n/a	221,440	159,339	180,573	159,863	-11.5%
RAS – HNA	5555 96th Avenue North, Brooklyn Park, MN 55443	39,895	N/a	186,600	604,200	625,500	714,515	14.2%
RAS- LEW	8565 Eagle Point Circle, Lake Elmo, MN 55042	20,462	n/a	250,000	237,520	119,477	Site closed	n/a
RAS- MKO	1400 Madison Avenue, Mankato, MN 56001	16,321	n/a	423,760	430,799	338,632	340,707	0.6%
RAS- MTP	8650 Springlake Drive, Mokena, IL 60448	25,000	n/a	242,880	226,200	234,720	240,840	2.6%
RAS- MHD	1250 29th Avenue South, Moorhead, MN 56560	12,600	n/a	168,120	177,160	142,840	125,600	-12.1%
RAS- OCL-200	4755 SW 46th Court, Ocala, FL 34474	23,500	n/a	262,800	287,600	68,300 (partial year)	Site closed	n/a
RAS- OCL-N	1227 SW 17th Avenue, Ocala, FL 34471	28,673	n/a	373,200	406,200	484,000	504,800	4.3%
RAS- RMV	1400 Normantown Romeoville, IL 60446	25,000	n/a	471,696	453,863	444,340	488,267	9.9%
RAS- STC	226 Park Avenue South, St Cloud, MN 56301	22,488	n/a	235,520	228,880	210,126	251,326	19.6%
RAS- TRU	330 Brandon Town Center Drive, Brandon, FL 33511	44,900	n/a	543,290	458,800	477,920	483,440	1.2%
RAS- WAU	1101 Westwood Drive, Wausau, WI 54401	20,650	n/a	289,768	251,249	229,671	217,584	-5.3%
GSU DC	600 Maryland Avenue SW, Suite 180, Washington, DC 20024	59,541	n/a	1,281,881	1,162,927	1,070,557	761,398	n/a closed 7/2025
*All kWh values provided by APEI								

APEI's two solar arrays are located on buildings that were sold in June, and therefore, the generation values were for Jan-May only. Solar energy is consumed on site but because the attributes are sold (through SREC) APEI must take ownership of the carbon associated with the equivalent amount of grid electricity and may not claim it as renewable. Solar generation and SREC data provided was for building 393, the largest array. Data provided for building 330 was not consistent with generation in previous years so CY24 data was used as proxy and pro-rated for the first half of the year (through May).

Solar Generation:

Solar Array Location	Address	System Size	CY 2025 Generation (kWh)
Finance Building	393 North Lawrence Street	375 kW	179,523
Academics Building	330 N. George Street	22 kW	10,415
IT Center	303 West Third Avenue	TBD	n/a
Total Solar Generation			189,938

CY 2025 Electricity Use Summary	Amount	Unit
Total electricity consumption	10,507,541	kWh
Solar Generation (RECs sold to SREC)	189,938	kWh
% consumed electricity from solar generation (RECs sold to SREC)	1.8%	Percent
% electricity reported as retrieved from grid	100%	Percent
% electricity retrieved from grid	98.2%	Percent

Table 7: RECS generated by Solar Arrays and sold to SREC (for informational purposes only)

	CY 2018	CY2019	CY2020	CY2022	CY2023	CY2024	CY2025 (approximate)
Building 393	429	389	398	457	469	472	180
Building 330	24	26	25	21	38	25	10
Total	453	415	423	478	507	497	190

Though actual reductions in consumption is always recommended the quickest way to minimize APEI's carbon footprint is to purchase RECs or enter into Power Purchase Agreements in which APEI owns the environmental attributes of the electricity generated. This could be done for any of APEI's sites but prioritizing high consumption sites in regions with the most carbon intensive electricity could be a more effective first step. Some utilities also provide clean power programs, and it would be worth investigating to see if any of APEI's electricity providers offer this option. RAS sites with known consumption located in Florida could be good candidates for REC purchases.

3.1 Electricity Emissions: Location-based

Location based emissions are calculated from kWh consumption provided on utility bills, or estimated based on square footage by applying emission factors based on facility location (eGRID factors published by EPA).

Solar power generated and consumed on-site is usually not included in the location-based value as this power has not been retrieved from the grid, however, APEI uses the electricity but sells RECs for the power generated and therefore must include emissions from that power as if it were grid electricity consumed. This will not be relevant going forward due to the sale of the site with solar arrays.

3.2 Electricity Emissions: Market-based

Market based emissions are calculated for each site according to the GHG Protocol Scope 2 guidance hierarchy. Utility-specific emission factors for delivered electricity were used to calculate emissions for sites where the utility is known, and an emission factor for that utility is available through the Edison Electric Institute. Supplier specific factors have been applied for the majority of APEI's sites.

GreenE residual mix^[5] emission factors were used where utility factors were not available^[6]. The GreenE residual mix adjusts eGRID factors to remove all GreenE-certified sales. As a result, these factors are slightly higher because they more accurately reflect the carbon intensity of electricity after renewable energy attributes sold and retired through GreenE have been excluded.

4. Scope 3: Upstream Indirect Emissions: Scope 3

Scope 3 emissions are currently calculated for employee commuting, business travel and waste. These categories were chosen based on availability of data and the ability for APEI to make significant measurable improvements through action. Scope 3 emissions values for each category are calculated according to the appropriate chapter of the *Technical Guidance for Calculating Scope 3 Emissions*.

4.1 Employee Commuting

The calculation methodology used for Employee Commuting follows the distance method outlined by the GHG Protocol Technical Guidance, Chapter 7 and emission factors from EPA. Emissions reported are calculated based on distance, according to vehicle type.

Miles estimates were calculated based on staff counts for each business unit, number of days in the office (from badge scans when available), and an average daily commute distance of 37 miles in United States retrieved from the Kelly Blue Book website and referenced as Federal Highway administration data for 2021. This average commute distance estimate remains appropriate as of 2026.

All vehicles used for commuting were assumed to be passenger cars, which includes passenger cars, minivans, SUVs, and small pickup trucks (vehicles with wheelbase less than 121 inches) per EPA's emission factor reference notes.

Table 8: Scope 3 Employee Commute miles and emissions by division

Organization	Estimated Miles traveled for commuting in CY 2025	CO2e (metric tons)
APEI	89,910	26.84
APUS	64,084	19.13
HCN	2,193,360	654.87
RAS ¹	4,577,196	1,366.61
GSU ²	188,552	56.30
Total	7,113,102	2,123.76
Note 1: Starting in CY 2023, Rasmussen University management changed their policy for on-site workers from requiring employees to be in the office five days per week to three days per week.		
Note 2: Due to GSUSA's July closure date, number of days used in annual mileage calculations were reduced by half for onsite and flexible workers.		

The number of miles driven to the office dropped significantly in CY25 from about 11 million down to 7 million. This was due to staff reductions of just over 40% of combined site based and flexible workers for both HCN and Rasmussen. APEI reduced onsite workers by 12, but APEI added 12 on-site workers so those divisions did not contribute to the change from the previous year, and GSU reduced by 2 workers which did not have a significant impact, though the July closure did reduce the number of commute days by half for both on site and flexible GSUSA staff.

4.2 Business Travel

APEI reports business travel emissions from Air, Rail and Vehicle travel. Data is obtained from multiple sources and forms (distance and spend). Data has been allocated to the appropriate division whenever possible, and the granularity of this data has improved significantly over time. Though there are still likely some cases where travel was allocated at the company level rather than the specific division, the data provided contained more of this information than in previous years.

Air Travel

Air travel remains the largest source of business travel emissions, and the most accurate estimates are based on known trip distances. When distance data was unavailable, trip lengths were estimated from spend using Direct Travel's cost-per-mile values. A medium-haul segment length was assumed, as it best represents most U.S. flights.

In some cases, mileage was reported by trip, but Direct Travel provided distance data only at the domestic and international levels. As a result, the 1,119,207 domestic air miles reported by Direct Travel were assigned medium-haul emission factors, which is why medium-haul travel is higher than in prior years. The lump-sum international air miles were assigned long-haul emission factors.

The APUS travel card included many travel expenses of \$250 or more that lacked sufficient detail. To maintain completeness, Sundowner included this spend in the estimate and calculated mileage from the reported amounts, although some charges may reflect bundled costs such as airfare, hotel, mileage, and meals. This assumption added about 140,000 miles to the medium-haul air travel category. If APEI confirms that these reimbursements do not include airfare, Sundowner can remove them from the estimate, though the overall impact would be small (18.6 mt CO₂e). Sundowner recommends requiring travel reimbursements to be itemized by category rather than submitted as lump sums with minimal detail.

Table 9: Air miles traveled

Airline Trip Length	CY 2022 Miles Traveled	CY 2023 Miles Traveled	CY 2024 Miles Traveled	CY 2025 Miles Traveled
Short Haul (< 300 miles)	1,719	7,091	2,595	1,504
Medium Haul (>= 300 miles, < 2300 miles)	867,262	1,912,736	632,764	2,641,499
Long Haul (>= 2300 miles)	969,668	803,012	1,096,521	253,395
Calculated from spend (trip length unknown)			1,582,094	n/a
Total Miles Traveled	1,838,649	2,722,839	3,313,974	2,896,398

Rail Travel

Rail travel is down from CY24 but there is evidence of both Amtrak and Metro use from the travel credit card export, which is encouraged.

	CY 2023 Miles Traveled	CY 2024 Miles Traveled	CY 2025 Miles Traveled
Rail	~3,400	38,347	18,712

Vehicle Miles Traveled

Quantity of miles driven in personal vehicles for business travel was provided as this information is needed for reimbursement. In cases where only the reimbursed value was provided, the mileage value could be calculated because the reimbursement amount is known. Though HCN travel was down slightly, the other divisions remain relatively consistent. GSUSA closed halfway through the year and the data supports this as recruitment efforts would have ceased.

RAS data was not provided and therefore the CY2023 year's value was again used as proxy. Sundowner will update the inventory if this data becomes available or remove if it is confirmed that RAS does not allow travel in personal vehicles.

Table 10: Miles traveled in personal vehicles

Personal Vehicle Miles Traveled	CY 2022 Miles Traveled	CY 2023 Miles Traveled	CY 2024 Miles Traveled	CY 2025 Miles Traveled
APEI	23,585	21,344	23,303	24,200
APUS	139,404	67,143	118,056	116,517
HCN	162,628	40,813	154,103	103,530
RAS	379,232	288,789	288,789 (not provided)	288,789 (not provided)
GSUSA	1,792	25,819	23,878	6,147
Total	706,641	443,908	608,129	539,183

Distances traveled in rideshare vehicles such as taxis, Ubers/Lyfts, etc., and rental cars is only available in spend format and is therefore estimated from dollar amounts as has been done in previous years.

Rental car agencies track mileage and fuel consumption and are often able to provide this data to their customers. To improve accuracy in this category, consider contracting with a preferred rental car agency who will provide this information, and use this agency for rentals whenever possible.

Table 11: Vehicle use (miles and taxi/rideshare)

Miles traveled in:	Data Quality:	Miles	Emissions Mt CO2e	% of VMT emissions
Personal Vehicles	Actual	539,183	161	70%
Taxi's, Ubers, Lyfts, Rental cars including fuel, other mileage reimbursements where miles not provided.	Estimated miles calculated from spend data	233,549	70	30%
Totals for vehicles			231	100%

4.3 Waste

Emissions from waste are dependent on a variety of factors including materials, and disposal methods. EPA publishes waste and recycling emissions factors by material in their *Emission Factors for Greenhouse Gas Inventories*, which also includes emission factors for recycling.

Emissions from recycling were calculated using the factor for mixed recyclables unless the material was known (such as paper). Emissions associated with recycling include transport to recycling facility and sorting of recycled materials at a material recovery facility. Waste sent to recycling has a lower emission factor than waste sent to landfill since recycled waste does not generate fugitive methane emissions from anaerobic digestion.

CY 2025's waste and recycling results showed significant improvement over last year. There was about a 7% decrease in waste sent to landfill (mostly due to site closures) but there was about a 50% increase in waste recycled, likely due to document purging prior to the sale of the two Charlestown buildings.

APUS's Iron Mountain report contained about three times the amount of paper shredded and recycled than was done in CY2024. Rasmussens' Shred It shredded paper report showed about 20,000 lbs. less than CY24 which netted out some of the total recycling gains, but overall recycled paper was still higher than the previous year. The quantity of emissions associated with the recycling of this paper is significantly less than it would be if sent to landfill. For example, the paper sent to Iron Mountain for recycling from APUS resulted in less than one metric ton of emissions, but sent to landfill, the amount of emissions generated would be almost 24 metric tons of CO₂e.

It is always recommended that APEI continue to allocate more paper and other recyclable waste to recycling and monitor waste levels in bins to determine if reduced frequency of waste pickups is possible. Rasmussen may also want to investigate the reason for the reduction in the Shred It report value.

Waste quantities from Republic Services were provided for APUS Charles Town and 8 Rasmussen sites. Two Rasmussen sites were assigned previous year values with the assumption that no change has been made to their service schedule. For all other sites, the weight for the year was estimated based on square footage and an average value calculated from known data. Sites that opened or closed during the year were pro-rated for the months that were operational.

Aside from the reduction in service at sites that were closed or sold, waste values remained relatively constant. All waste sent for disposal was assigned the emission factor for Mixed MSW sent to landfill. Consistent with previous years, hazardous waste, which is generally incinerated, was not included in the inventory.

Table 12: Non-Hazardous Waste Quantities

Non-Hazardous Waste	Quantity (lbs.)	% of weight	Emissions (mt CO ₂ e)	Percentage of emissions
Waste to Landfill	903,765	72%	262	97.6%
Waste to Incineration	0	0%	0	0%
Waste Recycled	352,989	28%	6	2.4%
Total Waste Generated	1,260,575	100%	270	100%

5. Quality Control Procedures

The inventory was submitted to APEI for review and comment, in addition to Sundowner Internal Review.

Internal Sundowner quality control procedure follows the WRI Protocol, Table 4: Generic Quality Management Measures, and includes a second party review of:

- Data gathering, input and handling activities
- Data documentation
- Calculating emissions and checking calculations

Data samples were reviewed for transcription errors, version control, data references, clear explanation of methodology, and logical and clear presentation of calculations.



6. Conclusion

APEI's total emissions by division are provided in the table below.

CY 2025	APUS Charles Town	Hondros School of Nursing	APEI Offices	Rasmussen	GSUSA	Total
Emissions Source	Emissions (metric tons CO2e)	Emissions (metric tons CO2e)	Emissions (metric tons CO2e)	Emissions (metric tons CO2e)	Emissions (metric tons CO2e)	Emissions (metric tons CO2e)
Scope 1 Emissions						
Stationary combustion	-	370.32	-	743.36	-	1,113.68
Mobile emissions	1.57	-	-	-	-	1.57
Fugitive emissions	123.96	-	-	93.38	11.84	229.18
Subtotal	125.52	370.32	-	836.74	11.84	1,344.43
Scope 2 Emissions - Location-based						
Electricity	779.90	529.83	17.88	2,692.10	214.84	4,234.56
District Heating or Purchases Steam	-	-	-	-	-	-
District Cooling or Purchased Chilled Water	-	-	-	-	-	-
Subtotal	779.90	529.83	17.88	2,692.10	214.84	4,234.56
Scope 2 Emissions -Market-based						
Electricity	633.50	555.50	18.73	2,427.46	193.69	3,828.88
District Heating or Purchases Steam	-	-	-	-	-	-
District Cooling or Purchased Chilled Water	-	-	-	-	-	-
Subtotal	633.50	555.50	18.73	2,427.46	193.69	3,828.88
Total Scope 1 and Location-Based Scope 2 Emissions	905.43	900.15	17.88	3,528.84	226.68	5,578.98
Total Scope 1 and Market-Based Scope 2 Emissions	759.03	925.83	18.73	3,264.19	205.54	5,173.31
Scope 3 Emissions						
Employee Commuting	19.13	654.87	26.84	1,366.61	56.30	2,123.76
Business Travel*	275.57	38.11	118.75	152.44	34.30	619.17
Air	204.42	6.35	96.77	52.09	26.00	385.64
Rail	1.58	-	1.14	-	0.10	2.81
Vehicle	69.57	31.76	20.84	100.35	8.20	230.71
Non-Hazardous Waste Disposal**	73.76	47.45	0.71	138.92	7.67	268.51
Emissions from Waste Disposed in Landfill	69.60	47.45	0.71	136.66	7.67	262.09
Emissions from Recycling	4.16	-	-	2.26	-	6.41
**Waste emissions are estimated based on square footage for locations without invoices (All HCN and GSUSA and some Rasmussen sites). *Note that some Business Travel for APUS may have been reported under APEI *Note that some Business Travel for HCN may have been reported under APEI *Note that some Business Travel for GSUSA may have been reported under APEI						

Energy use (kWh)	APUS Charles Town	Hondros School of Nursing	APEI Offices	Rasmussen	GSUSA	Total
CY 2025						
Direct Energy Use						
Stationary combustion	0	2,043,332	0	4,101,633	0	6,144,965
Mobile emissions	6,532	0	0	0	0	6,532
Subtotal	6,532	2,043,332	0	4,101,633	0	6,151,497
Indirect energy use						
Electricity	1,877,195	1,262,574	49,004	6,544,567	774,111	10,507,451
Total energy use	1,883,727	3,305,906	49,004	10,646,200	774,111	16,658,948

APPENDIX A: LIST OF ACTIVE SITES IN CALENDAR YEAR 2025

Organization	Unique ID (Assigned by Sundowner)	Facility Name	Facility Address	State	Zip	Square Footage
APEI	APE002	Executive Offices	200 SW 1st Avenue, Suite 920, Fort Lauderdale	FL	33301	3,082
APUS	APU111	HR	111 West Congress Street	WV	25414	10,432
APUS	APU216	Security/Overnight guests	216 South George Street	WV	25414	5,400
APUS	APU303	IT	303 West third Avenue Ranson	WV	25414	38,200
APUS	APU330 (Sold 7/2025)	Academics	330 North George Street	WV	25414	45,000
APUS	APU393 (Sold 7/2025)	Finance/Admissions/Facilities	393 N. Lawrence Street	WV	25414	105,000
APUS	APU406	Facilities Storage	406 South Buchanan Ranson	WV	25414	6,300
HCN	HCN002	Akron	755 White Pond Drive, Akron, OH 44320	OH	44320	17,510
HCN	HCN003	Bingham Farms	30700 Telegraph Road, 4th Floor, Bingham Farms	MI	48025	29,410
HCN	HCN004b (Open 2024)	Colombus	1105 Schrock Rd.	HO	43229	45,716
HCN	HCN005	Cincinnati	7600 Tylers Pl. Blvd, West Chester	OH	45069	20,062
HCN	HCN006	Cleveland	5005 Rockside Rd. Suite 130, Independence	OH	44131	22,120
HCN	HCN008	Dayton	6520 Poe Avenue, Suite 110/200/300, Dayton	OH	45414	27,747
HCN	HCN009	Indianapolis	3500 Depauw Boulevard, Suite 1070, Indianapolis	IN	46268	20,270
HCN	HCN010 (open 2024)	Toledo (Maumee)	1695 Indian Wood Circle, Suite 200, Maumee	OH	43537	26,586
RAS	RAS001	Aurora, IL	2363 Sequoia Dr, Aurora, IL 60506	IL	60506	20,910



Organization	Unique ID (Assigned by Sundowner)	Facility Name	Facility Address	State	Zip	Square Footage
RAS	RAS003	Bloomington, MN	4400 W 78th St, Suite 600, Bloomington, MN 55435	MN	55435	30,384
RAS	RAS005	Central Pasco, FL	16418 State Road 54, Odessa, FL 33556	FL	33556	45,555
RAS	RAS009	Eagan, MN (eff 12/1/21)	1305 Corporate Center Drive, Suite 200, Eagan, MN 55121	MN	55121	31,795
RAS	RAS010	Fargo, ND	4012 19th Avenue South, Fargo, ND 58103	ND	58103	18,000
RAS	RAS011	Ft Myers, FL	9160 Forum Corporate Parkway, Suite 100, Ft Myers, FL 33905	FL	33905	27,343
RAS	RAS012	Green Bay, WI	904 South Taylor Street, Suite 100, Green Bay, WI 54303	WI	54303	20,000
RAS	RAS013	Hennepin Anoka - MN (eff 7/1/22)	5555 96th Avenue North, Brooklyn Park, MN 55443	MN	55443	39,895
RAS	RAS017	Mankato, MN	1400 Madison Avenue, Mankato, MN 56001	MN	56001	16,321
RAS	RAS018	Mokena-Tinley Park, IL	8650 Springlake Drive, Mokena, IL 60448	IL	60448	25,000
RAS	RAS019	Moorhead, MN	1250 29th Avenue South, Moorhead, MN 56560	MN	56560	12,600
RAS	RAS021	North Orlando, FL	385 Douglas Avenue, Suite 1000, Altamonte Springs, FL 32714	FL	32714	21,612
RAS	RAS023 (Open 2024)	Ocala Nursing, FL	1227 SW 17th Avenue, Ocala, FL 34471	FL	34471	28,673





Organization	Unique ID (Assigned by Sundowner)	Facility Name	Facility Address	State	Zip	Square Footage
RAS	RAS024	Orlando, FL	8541 Southpark Circle, Orlando, FL 32819	FL	32819	18,329
RAS	RAS025	Overland Park, KS	11600 College Boulevard, Overland Park, KS 66210	KS	66210	15,385
RAS	RAS026	Rockford, IL	6000 East State Street, Suite 400, Rockford, IL 61108	IL	61108	26,563
RAS	RAS027	Romeoville/Joliet, IL	1400 Normantown Road, Romeoville, IL 60446	IL	60446	25,000
RAS	RAS028	St Cloud, MN	226 Park Avenue South, St Cloud, MN 56301	MN	56301	22,488
RAS	RAS029	Tampa-Brandon, FL (eff 6/30/21)	330 Brandon Town Center Drive, Brandon, FL 33511	FL	33511	44,900
RAS	RAS030	Topeka, KS (effective 4/3/23)	3722 SW Burlingame Road, Topeka, KS 66611	KS	66611	16,096
RAS	RAS032 (Closed 9/2025)	Twin Cities Office, MN	8300 Norman Center Drive, Suites 300 & 650, Bloomington, MN 55437	MN	55437	31,214
RAS	RAS033	Wausau, WI	1101 Westwood Drive, Wausau, WI 54401	WI	54401	20,650
GSU	GSU001 (Closed 7/2025)	Washington DC	600 Maryland Avenue SW, Suite 180, Washington, DC 20024	DC	20024	59,541
GSU	GSU002 (Closed 7/2025)	Honolulu	900 Fort Street Mall, Pioneer Plaza, Suite 1540, Honolulu, HI 96813	HI	96813	2,002





APPENDIX B: DOCUMENT REVISIONS

Version Number:			
<i>Version</i>	<i>Prepared By:</i>	<i>Date</i>	<i>Presented to:</i>
1.0	Brooke Farrell, Sundowner Sustainability Consulting Initial Report	2025-05-22	Chris Lowe Chris Symanoskie Allison Knight

