

**Aspen Group, Inc.**  
**720 South Colorado Boulevard**  
**Suite 1150N**  
**Denver, Colorado 80246**

May 19, 2015

**VIA EDGAR**

Mr. Larry Spigel  
Assistant Director  
Division of Corporation Finance  
U.S. Securities and Exchange Commission  
Washington, DC 20546

Dear Mr. Spigel:

Please find our responses to the comments received from you in your letter dated April 30, 2015 related to the filings of Aspen Group, Inc. (the "Company"). Our response to each comment follows your comment which has been reproduced.

Business, page 1

Regulation of Federal Student Financial Aid Programs, page 9

1. We note that an institution must satisfy DOE regulations regarding its "administrative capability" to participate in Title IV programs. In your future filings, please revise to clarify whether your current operations satisfy these standards.

Response to Comment 1: We have evaluated our operations under the criteria set forth by the Department of Education ("DOE") and believe that our current operations satisfy the DOE's "administrative capability requirements." The Company will expand its disclosure to include this in future filings.

2. We note that an institution must also satisfy DOE's "financial responsibility" requirements to access Title IV program funding. DOE evaluates institutions on an annual basis to assess their compliance with financial reporting standards. In your future filings, please disclose your compliance with DOE's financial responsibility standards, including your composite score. Please also disclose whether you fail to satisfy any other financial responsibility standards, including whether you received an unqualified opinion from your independent auditor or remained current on your debt payments.

Response to Comment 2: Our composite score for the year ending April 30, 2014 was approximately -1.0. Subject to any changes in connectucD,a ~ Lct Lct r

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