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February 18, 2013

Director, Information Collection Clearance Division
U.S. Department of Education
400 Maryland Avenue SW
LBJ, Room 2E117
Washington, DC 20202-4537

RE: Notice of Proposed Information Collection
Federal Register, December 19, 2012
ED-2012-ICCD-0069

Dear Director:

Thank you for the opportunity to comment on the proposed information collection request, Foreign Graduate Medical School Consumer Information Reporting Form. This response is being made on behalf of the following DeVry institutions: Ross University School of Medicine and American University of the Caribbean School of Medicine, which together serve approximately 5,000 U.S. students.

We applaud the efforts of the Department to ensure that students enrolling in medical programs offered at foreign institutions have access to appropriate consumer information to assist them in selecting the institution that best meets their educational and career objectives.

Our commentary will include a discussion of:

- Instructions
- Similarity to Gainful Employment reporting requirements
- Burden

Instructions

There are two areas within the Consumer Information Reporting Form instructions for which we would like to request clarification: definition of U.S. student and reporting period.



Definition of U.S. student

To assist foreign graduate medical schools in identifying the appropriate population to include in the calculations required for this information disclosure, it would be helpful if “U.S. student” were clearly defined in the instructions. In most areas, the form references “U.S. students”, but on the first page of the instructions under “Information to Disclose to Prospective U.S. Students”, the instructions refer to “the cohort of American students”, implying that only U.S. citizens should be included in the population for the report.

As an example, 34 CFR 600.55(d)(1)(i) specifies the MCAT score reporting requirement applies to “U.S. citizens, nationals, or eligible permanent residents”. This makes it very clear which students should be accounted for in the report. We recommend updating the instructions for the disclosure form to include a definition of “U.S. student” similar to the one found in this regulation.

Reporting period

Throughout the instructions, three distinct reporting periods are mentioned, including: calendar year, academic year, and award year. The use of all three timeframes for the report could cause confusion for the typical consumer. We believe award year should be used as the reporting period for all of the calculations required for completion of this form.

Similarity to Gainful Employment reporting requirements

For-profit institutions are already required by Gainful Employment regulations to calculate and disclose (§668.6(b)) nearly identical student debt and on-time completion information. However, the regulation requires reporting by award year (§668.6(c)(1)), not by calendar year as in the proposed collection. As a result, for-profit institutions would have to calculate and disclose the same basic metrics for two different timeframes. We believe this is an undue burden, but more importantly it will likely cause confusion among consumers, the media, regulatory agencies, and other interested parties. We either recommend that the reporting years for institutions subject to this reporting requirement and the Gainful Employment disclosure requirements be either aligned or that institutions subject to the Gainful Employment disclosure requirements be exempted from the disclosure requirement within this rule.



Burden

We believe the burden hours calculated by the Department of Education underestimate the time institutions will devote to performing the calculations and completing the associated form. We estimate that it will take approximately 11 hours per institution to prepare the data and complete the disclosure form.

Task	Total Time (in hours)
Development and running of database queries	4
Initial review of query results and perform calculations	6
Compliance review of proposed submission	6
Development/update of marketing and disclosure materials	16
Total	32

Thank you again for the opportunity to comment on this proposed information collection. Please feel free to contact me with any questions regarding these comments.

Sincerely,

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