

Submitted By: Clare McCann

Deputy Director for Federal Policy

New America, Higher Education Initiative-

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**1. 6.1: General Questions Section**

*Recommendation: Require institutions to submit both OPE IDs and Unit IDs through the IPM, as well as require VA facility codes.*

- The IPM system is designed to facilitate the determination of, and to track, institutional eligibility for the programs authorized by the Higher Education Act of 1965, as amended. The collection of Unit IDs and VA facility codes are not required to determine institutional eligibility for Title IV Program Participation.

**2. 6.3: Officials Section**

*Recommendation: Require each institution to submit the name and contact information of its Registrar or Registration Officer, and to update all contact information in a timely manner.*

- 34 CFR 600.21 (a)(6) and (7) indicate that schools are required to report changes of information about the school, including the Chief Executive Officer (President), Chief Financial Officer, and Financial Aid Director. We may consider including that information in a future enhancement.

**3. 6.5: State Authorization and Accreditation Section**

*Recommendation: Collect clearer information on programmatic accreditors of an institution's program(s).*

- 34 CFR 600.4, 600.5, and 600.6 require that eligible schools be accredited or, for some types of schools, pre-accredited. To meet this requirement a school must have institution-wide accreditation.
- Schools are permitted to report programmatic accreditation, but there is no basis to require such reporting.

*Recommendation: Require reporting on state authorization reciprocity agreements, and maintain/repurpose a list of all reported reciprocity agreements.*

- This will be considered for a future enhancement when the regulations regarding reciprocity agreements become effective July 1, 2018.

*Recommendation: For each program leading to an occupation for which there are licensing requirements in any state, collect the name of the state agenc(ies) that oversee those requirements.*

- The regulatory requirement in 34 CFR 600 is for schools to be authorized to provide an educational program in a state. Therefore, the state agency information collected is that of the agency that licenses/approves the school, not the occupational licensing agencies.

#### 4. 6.6: Control and Structure Section

*Recommendation: Require publicly traded institutions to complete information about filings with the SEC, including providing a link to SEC Form 8-K filings and providing timely updates about sanctions from the SEC such as a warning that the SEC may suspend trading; notice that the institution is not in compliance with SEC rules; or notification that the SEC has delisted the stock.*

- 34 CFR 668.23 (d) requires that schools provide Audited Financial Statements to enable the Secretary to make a determination regarding the school's financial responsibility under 34 CFR 668.15.
- This information is received and monitored through a separate process.

#### 5. 6.8: Educational Programs Section

*Recommendation: Require institutions to identify all programs that are offered entirely through distance education.*

- This will be considered for a future enhancement.

*Recommendation: Require data entry of withdrawal rate for all institutions and require such reporting annually, rather than only for initial applications.*

- 34 CFR 668.16 indicates that the withdrawal rate requirement applies only to schools seeking approval for initial participation.

*Recommendation: Require data entry of graduation and placement rates for short-term programs from the audit system.*

- If an institution is cited in an audit for failure to meet the minimum completion and placement rates for a short term program, the audit would be flagged for review and resolution.
- This will be considered for future enhancement to ensure that the rates are included in the audit for all eligible short term programs.

#### 6. 6.12: Complete More Details Section

*Recommendation: Incorporate a new category for "sanctions" on a particular institution from oversight or law enforcement bodies. Require institutions to report any sanctions placed on them by an institutional or programmatic accrediting agency; a state authorizer; a state licensure body; or any state or federal law enforcement agency.*

- 34 CFR 602.26 and 602.27 require accrediting agencies to provide certain notification to the Secretary about their decisions regarding schools.

- The Program Participation Agreement signed by schools participating in the Title IV, HEA, programs, requires that they submit a teach-out plan if they lose accreditation or state authorization.
- This information is received and monitored through a separate process.
- This will be considered for a future enhancement.

## 7. 6.16: Third Party Servicer Section

*Recommendation: For each third-party servicer with which an institution has a contract, report the percentage of that servicer's work spent on recruitment activities.*

- There is no regulatory limit on the amount of time that can be spent on recruitment activities, so we would have no regulatory basis for asking this question.

*Recommendation: Collect information on sub-contractors included in third-party servicer contracts.*

- We would need to consider the costs/benefits of collecting this information, and whether we have the authority to require that it be reported.

Submitted By: Christopher Tellis Owner California College of Barbering and Cosmetology
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*I am the owner of a private postsecondary school in Stockton California, preparing students for employment in the beauty services sector. I am writing to request reform on the regulation that requires that 60% of our graduates gain employment in a field directly related to our course of instruction.*

- Placement requirements established by statute/regulation can only be changed through a change to the statute/regulation. We cannot use the Eligibility Application, or any other reporting mechanism, to affect a change to the regulations.