

Comment: Several commenters praised the proposed new simplified format, while several pointed out that it would be easier to read and easier for prospective students to understand while also being less burdensome and time-consuming for schools to complete. Two commenters stated a belief that the new disclosure template would make it easier to compare data across institutions.

Response: The Department thanks these commenters for their support of the streamlined 2019 GE Disclosure template.

Comment: One commenter described general disapproval with the new streamlined approach to the GE Disclosure template. Several commenters had suggestions for items that should be added to the proposed 2019 GE Disclosure template, including percent of students who complete within estimated program length, the living expenses portion of cost of attendance, net price, withdrawal rates, placement rates, typical occupations of program completers, the percent of students who borrow, median debt, median monthly loan payments, earnings data, and the set of disclosure items used on the 2017 GE Disclosure Template.

Response: We believe that the proposed 2019 GE Disclosure template strikes the right balance between providing useful information to students, reducing unnecessary school burden, and minimizing information overload and confusion on the part of students. In response to comments we received, the Department is adding median debt to the 2019 GE Disclosure Template.

Comment: One commenter expressed concern that adding a link to the College Scorecard was meant to be a replacement for removed information.

Response: The addition of the link to the College Scorecard is not a replacement for removed items. The proposed 2019 GE Disclosure template was streamlined to reduce burden to schools and to reduce student confusion. The College Scorecard link is not intended to replace removed items, but rather to provide an additional resource for students who would like further information.

Comment: One commenter voiced frustration with the current template's lack of a function to save data and finish completing later, and expressed support for the new disclosure template's flexibility to allow schools to publish the required items in a format that works for them.

Response: The Department thanks the commenter for their support of the redesigned template. The 2019 GE Disclosure template addresses their concerns about the functionality of the 2018 template and burden on schools.

Comment: Two commenters expressed concern over the burden of disclosure templates and whether students understand them, with one suggesting that the information be placed in the school's catalog instead.

Response: We believe the 2019 GE Disclosure template addresses these concerns about burden and using data that students can understand. Under 34 CFR 668.412(c), institutions are required to include on their GE program webpages the GE disclosures or a link to that information.

Comment: Two commenters requested that ED keep the HTML-based template, but redesigned for the strictest state accessibility standards. They also suggested making its use by schools optional.

Response: The Department appreciates this suggestion, but it could create difficulty for schools if state standards change. Allowing institutions to format the information in a way that works for their website and their state will make the task of posting and updating easier for institutions without sophisticated IT departments, will clarify that schools are responsible for compliance with accessibility standards for their own state or states, and will allow schools the flexibility to respond to changes in data or feedback from their audience on what is effective.

Comment: A few commenters stated that they wished to see data from the consumer testing that was used to create the proposed 2019 GE Disclosure template.

Response: Consumer testing was not specifically done on the proposed 2019 GE Disclosure template. The regulation requires that selection of items for the disclosures be informed by consumer testing, not that the testing be repeated annually. Knowledge of what items were meaningful or confusing to students was acquired through prior testing conducted in 2016 and 2017, and reports are available under the Gainful Employment Focus Groups subheading at <https://www2.ed.gov/about/offices/list/ope/ge-template.html>.

Comment: One commenter stated that they believed that stating the full cost of the program was misleading and that it should be instead listed on a per-year basis.

Response: Since 2012, schools have been required to post the full cost of their GE program, not just by semester or credit hour. We do not think the full program cost is confusing to students.

Comment: One commenter expressed concern with the logistics of fitting a URL for disclosures into marketing materials and thought it redundant when schools would already be required to hand-distribute copies of disclosures to prospective students.

Response: As announced in a notice published in the *Federal Register* on June 18, 2018 (83 FR 28177, as corrected at 83 FR 28543), the Department is allowing additional time, until July 1, 2019, for institutions to comply with the requirement in 34 CFR 668.412(d) to include the GE disclosures, their URL, or a link to the disclosures in their program promotional materials.

Comment: One commenter suggested that institutions should be permitted to use a decimal in the program length field of the GE disclosures template to accurately describe programs that are 0.5 or 1.5 years in length. Another commenter suggested allowing schools to list program length in clock or credit hours instead of calendar time.

Response: Programs that are half a year should be displayed in months (6 months). Although the 2019 GE Disclosure template format would allow schools to display the time in partial years (.5 as in their example) the Department has also stated that the disclosures should be consistent with what is

reported to NSLDS, which does not take decimals. Institutions may provide additional information to students, such as program length in clock time or credit hours, but the Department believes that providing program length in calendar time is useful to students and not burdensome to schools since it is consistent with NSLDS reporting of program length.

Comment: One commenter stated that the template should use the most recent data available – data from the prior year for completer-based information, and information for the upcoming year for program costs. Another commenter voiced concern about the timeliness of data used on the current GE Disclosure template.

Response: The 2019 template is requesting that schools use the most current data available.

Comment: One commenter requested that we clarify when warning language is required.

Response: We believe the instructions are clear. Once the 2019 GE Disclosure template has been approved, the Department will issue an Electronic Announcement with the deadlines for posting GE disclosures using the 2019 GE Disclosure template. In that announcement, we will provide information as to when warning language is required.

Comment: Two commenters requested clarification on which states would be included in the licensure disclosures. Another commenter disliked the category options for the licensure question and the distinction being made between programs meeting or not meeting licensure requirements versus meeting or not meeting requirements to sit for a licensure exam. This commenter also voiced a preference to resume including an option to make a single indication that a program's target occupation would not require licensure in any state.

Response: Under the 2019 GE Disclosure template, in addition to disclosing whether a program meets licensure requirements for any states in the institution's Metropolitan Statistical Area, institutions may provide information "for any states for which the institution is aware of whether the program satisfies all educational prerequisites to qualify a student for licensure." In the 2017 focus group, students showed an appreciation for knowing whether they would have to sit for a licensure exam in addition to completing the program before working in their target occupation (and actually voiced a desire to see additional information about licensure exams and licensure requirements), so the Department feels that this distinction does have value. Under the proposed 2019 GE Disclosure template, a school would have the ability to respond "all 50 states" or even something such as "all states but Oregon and California" in the category for "The following states do not have licensure requirements for this profession."

Comment: One commenter suggested exempting public institutions from the disclosure requirements. Another commenter suggested expanding the disclosure requirements to all Title IV-eligible programs instead of just GE programs.

Response: The Department thanks the commenters for their feedback, but Gainful Employment disclosures are regulatory requirements and expanding or limiting their application is outside of the scope of this information collection.