GAINFUL EMPLOYMENT

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PURPOSE

Provides a framework for <u>accountability</u> that defines what it means to prepare students for gainful employment.

These measures are intended to assess whether such provides provide quality education and training to their students, leading to earnings that will allow students to repay student loan debt upon program completion.

Establishes a framework for transparency.

What programs are considered GE?

- Any program which leads to a certificate, or other nondegree recognized credential, and which prepares students for gainful employment in a recognized occupation.
- Any eligible educational program offered by a for-profit proprietary institution of higher education or postsecondary vocational institution.
- ▶ Virtually all non-degree educational programs awarded by public or private, nonprofit institutions are GE programs.

Exceptions

- ► Teacher Certification Coursework if the coursework is necessary for the student to receive a professional teaching certification or credential from an entity other than the institution itself, such as the state.
- Preparatory Coursework not considered a GE if it is coursework necessary to be accepted into an eligible program.
- Approved Comprehensive Transition and Postsecondary Programs for Students with Intellectual Disabilities.

Question 1: Does the institution wish to have the educational program be (or remain) eligible for Title IV aid?

Yes - Continue to the next question.

No - The program is NOT eligible for aid and is therefore not a GE program.

Question 2: Does the coursework lead to a degree, certificate, or other credential awarded by the institution?

Yes - Continue to the next question.

No - The program is NOT eligible for Title IV and therefore not a GE progam.

Question 3: Is the institution a for-profit (proprietary) institution?

Yes - The program is a GE program

No - Continue to the next question.

Question 4: Is the credential awarded by the public or private nonprofit institution an associate, bachelor's, graduate, or professional degree?

Yes - The program is not a GE program.

No - The program is a GE program.

General Reporting and Approval Requirements

- Changes to existing GE programs
 - School must report no later than 10 days after the change occurs:
 - ► Establishing or reestablishing program eligibility
 - ▶ Changing name, CIP code, or credential level
 - Discontinuing program eligibility when it fails to meet the required D/E rate thresholds
 - ► Ceasing to provide program for at least 12 months
 - ► Losing program eligibility
 - Certifying the eligibility of each GE program listed on the school's ECAR

Certification of GE Progams

Must satisfy these requirements:

- Approval by a recognized accrediting agency;
- Approval by a state agency for public vocational institutions;
- Programmatic accreditation if required by a federal or state governmental entity;
- Educational prerequisites for employment licensure or certification; and
- Similarity to ineligible educational programs.

Data Reporting

- Students to include
 - Title IV aid recipients
- Programs to include
 - All Title IV-eligible GE programs
- Cohorts to include
 - Cohort period length determined by number of completers in the cohort

Reporting Methods

- Data provided to the NSLDS by October 1 annually.
- Can be reported in batch or online processes.
- Online process allows schools to:
 - Directly add students;
 - Upload GE program information directly to NSLDS;
 - ► Enables schools to update, correct, and/o deactivate GE records that previously were reported to NSLDS.

Data Required to be Reported to ED

- Program Information
- Enrollment Information
- Cost and Debt Information
- Placement rates, if required by the school's accrediting agency or state.

Program Disclosures - Allows students to make informed decisions

- New template of requirements beginning January 1, 2017.
- Refer to Gainful Employment Electronic Announcement #103
- By July 1, 2017, schools must update disclosures for each GE program using the new Disclosure Template.
- ► Templates must be updated annually (usually required by the end of January).
- Schools with GE programs in which fewer than 10 students complete the program during the award year do not have to disclose on-time completion rate and median loan debt (includes Title IV debt and private debt).

Negotiated Rulemaking

- Ended without consensus from the negotiators.
- ▶ Leaves the Department to write rules as they see fit.
- Key objections surround:
 - Expansion of regulations to all undergraduate programs;
 - Removal of automatic loss of Title IV eligibility as a sanction;
 - > Lack of ability to identify realistic metrics given the lack data available to negotiators.

DISCUSSION...