Subject: RE: Proposals from Marc Jerome

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From: Chip Cameron [fxcameo@█████████]
Sent: Tuesday, October 01, 2013 7:41 PM
To: Kolotos, John; Rory O'sullivan; Angela Peoples; Eileen Connor; Whitney Barkley; Margaret Reiter; Tom Tarantino; Kevin Jensen; Mohr, Rhonda (rmohr@█████████); Warner, Jack; Sandra Kinney; Justice, Della (KYOAG); Libby DeBlasio; Ted Daywalt; Tom Kriger; Helga Greenfield; rhiggs@█████████; Richard Heath; Glen Gabert; Nassirian, Barmak; Barbara Hoblitzell; Jenny Rickard; tdalton@█████████; Brian Jones; Raymond Testa; JBerkowitz@█████████████; Belle Wheelan Private; nharvison@█████
Cc: Marc Jerome; Mahaffie, Lynn; Wilson, Amy; charlie pou
Subject: Proposals from Marc Jerome

Negotiators:

Attached are proposals from Marc Jerome on a number of subjects. As I informed you yesterday, Marc had a family medical issue which prevented him from submitting these yesterday. Here they are. I have included his entire message below to aid in understanding what he is proposing.

The Department is closed, so we'll need to wait and see how much time they will have to evaluate all the proposals that you have submitted before the next meeting. At some point they will inform us if the next session has to be re-scheduled. However, there's nothing to prevent you from discussing any of these proposals on your own, if you think that would help when we eventually get back together. I am also off the clock but wanted to make sure that Marc's proposals got to you.

Chip

"To the Department and My Fellow Negotiators:

Thank you for the opportunity to present a few comments and suggestions regarding the proposed gainful employment rule. It has been a pleasure working with you on this challenging topic. I have enclosed proposals relating to three topics:

•   Opportunity to Improve Program Performance

•   The Debt to Earnings Calculations

•   Practical Alternatives to Reduce Student Debt

All of the proposals are meant to be constructive and help the Department meet its goals of assuring that gainful employment programs prepare students appropriately and without too much debt.

After spending the last three years immersed in the details of two complex proposed GE rules, I have concluded trying to fully understand their impact is a nearly impossible task —the more one reads the regulation, the more questions that arise.

While debt-to-earnings information is relevant, I believe the ratio is too narrow a measure to determine which programs prepare students for gainful employment. As a result, I am unsure that the rule achieves its intended purpose. I do not

see how the rule can identify programs do not lead to gainful employment if it does not measure whether students complete the program in the first place. In fact, the rule seems to reward programs where almost all students drop out.

As a result, I would like to see the rule incorporate graduation rates and default rates in some manner.

Thank you for working together on this."