Committee Members Attending: Daniel Reed (Chair); Ja’Nelle Simpson; Callie Woods; Louise Jones; Angelina Arzate; Malina Chang; Natasha Kobrinsky; Thomas Le; Special Guest: Rhonda Mohr (by report)

Committee Members not in attendance: Peggy Wellisch; Daniel Wait, Nicole Lee, Vicki Shipley; Dr. Scott Cline; Dr. Pat Hurley; Brad Soriano; Jennifer Kelly; Anafe Robinson; Melissa Moser; Daniel Roddick; Ena Hull

Committee Update

- Gainful Employment Hearings, Part 1 – Guest: Rhonda Mohr
  - First official NegReg meeting in September, next in October (2 meetings, though usually there are 3)
  - Shared Rhonda’s report (attached)
    - Many Proprietary schools may already be good with these requirements, for the most part
  - Unintended Consequences:
    - Doesn’t fit the student who takes a program out of interest/self-fulfillment rather than career change
    - Arbitrary 180 day job placement metric does not fit all industries, market/economic conditions (i.e. unemployment rates)
    - Different segments with different missions will go about this differently; CCs do not advertise job placement
    - Community Colleges do not currently have the infrastructure to support gathering this data...Is data based on student responses? Chancellor’s office is looking to prepare this structure
    - What about the self-employed student after completing a program?
    - Other factors of finding a job: past employment history, prior convictions, family commitments – penalizing underserved student populations!
    - May end up restricting access to programs or restricting aid from programs
    - It is not uncommon for Veterans who accept Federal loans to enroll in multiple programs (i.e. Plumbing, Massage Therapy, Criminal Justice, etc.) in order to use their military benefits – which program would be used for placement? The first? The last?
    - How do we assess that a student is using the skills acquired in the program, even if in a different field?
  - CDR includes all students at an institution, therefor not an accurate measurement for GE Programs

Membership Update

- None at this time
- For the future:
**Any new issues we should be aware of?**

- New ED Call in number
- Who are our current regional Trainers?
  - Virginia Hagins, Virginia.W.Hagins@ed.gov
  - Robert Vallas, 415.486.5617, Robert.vallas@ed.gov
  - Have not had great experience recently getting consistent answers...
- No other issues at this time

**Other Questions?**

None

**Next Meeting**

October 10th, 2:00-3:00

**ACTION ITEMS**

- Daniel will send this GE feedback to Rhonda Mohr

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**GE Hearings report from Rhonda Mohr**

There are a couple of controversial issues being discussed by the Gainful Employment negotiated rulemaking committee. They are:

1. There is a proposal on the table to have a placement rate metric for Gainful Employment programs. This data would have to be reported to the Department (not just disclosed to students) and programs not meeting the standard could be sanctioned. Here is the proposal:

   Job Placement means within 180 days of completion/graduation the student has been employed for at least 13 weeks with the employer in a full-time paid position in the field or related field of study. In field of study/related field of study means employment is:
   - (1) Included in the list of job titles for the program published by the institution and included in the list of Classification of Instructional Program (CIP) job titles on O*NET crosswalk for which the programs were approved by the Department;
   - or
   - (2) In a position where the routine work predominantly requires using the core skills and knowledge expected to have been taught in the program and the position requires education beyond high school level;
   - or
   - (3) In instances where completers/graduates are continuing in prior employment, the prior employment must be reasonably related to the program training and the completer/graduate attests in his/her own handwriting at the time of enrolling in the program and upon completion of the program, with reference to a specific written policy of the employer, to the benefit of the training as a catalyst for maintaining or advancing in a position.

2. There is also a proposal by the Department that they use CDR as a metric for Gainful Employment programs. We haven’t seen detail on that yet.

If you have any comments from your committee on either of these issues please share them with me. Have a good meeting and thanks for the invite. Keeping tabs on CSAC is a fairly high priority here!

Rhonda Mohr

Specialist, Student Financial Aid

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