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1) The regulations stipulate that GE programs will need to amend the length of their programs (by clock or credit hours) to the equivalent required for training as established by the state:

- a) Is this only applicable to programs preparing students for jobs that require a license?
 - i) If yes, is this further only applicable to programs preparing students for jobs where that license requires the successful completion of an exam?
 - ii) If this is not limited to licensed fields of work, what sources of state authority are applicable to determine what the minimum state requirements are? Is the state or regional accrediting body the determining authority?
- b) What if there are differing and competing state requirements? How do we determine which to follow? Or are we free to make that determination and implement based on a state authority of our choosing?

2) The regulations state that this requirement to amend the length of GE programs does not apply for "occupations where the state entry-level requirements include the completion of an associate or higher-level degree":

- a) What state authority determines those entry-level requirements? Does this mean the entry-level requirements to receive a license? Does this mean the entry-level requirements to be competitive in the job market to secure a job? Does this mean the entry-level requirements per our accrediting body?
- b) If programs currently require an associate degree, do those programs fall under this exception? Or is this exception only specifically if some state authority has determined an associate or higher-level degree is required?

3) We request the Department be mindful that current GE program requirements are not simply about the minimum requirements for a license, but also about what is required for a student to be competitively trained for the job market. Licensure requirements often set the floor or the base of what a student should know and be able to do. Being properly prepared to effectively perform a job typically requires more than the base training. We are concerned that these changes will leave students unprepared and less competitive in the job market. We request the Department conduct an evaluation of how these changes will impact students' program completion and job outcomes.

4) We request the Department extend the deadline by which program lengths need to be amended. Changing the length of a program requires changing the entire curriculum of the program, as well as securing accreditation and state regulatory agency approval for those program changes. We need a minimum of two years to complete the internal institutional curriculum revisions and then an additional third year to secure accreditation and state regulatory agency approval. We request the deadline to have new, shorter length programs designed, approved and fully operational to enroll students be extended to July 1, 2027 to allow for a sufficient planning and implementation period.