



RIN: 1840-AD31

Title: Program Integrity; Gainful Employment

Agency/Subagency: Department of Education (ED) / Office of Postsecondary Education (OPE)

Thank you for the opportunity to submit comments on the changes to the gainful employment rule. Unfortunately, the Department of Education is proposing a rule that is deeply flawed. The proposed rule caters to the interests of predatory colleges offering programs with poor outcomes and will result in hundreds of thousands more students falling victim to programs that leave them underemployed and buried in debt.

The proposed rule fails to serve the students whom the Department of Education is meant to protect and allows low-value programs to continue to evade responsibility while receiving billions taxpayer money as their graduates suffer. Under this rule, students and taxpayers will continue to pay the price for institutions' bad behavior.

The gainful employment rule works.

First, the current rule effectively protects borrowers and taxpayers from career-training programs that do not provide a meaningful return. The proposed rule eliminates the gainful employment regulations entirely. These regulations protected students by terminating student aid eligibility for career training programs that would leave their graduates with too much debt relative to their earnings. It does not offer any alternative to hold colleges accountable when they fail to serve students well. In effect, more students will face financial hardship while colleges offering low-value programs continue to pad their pockets with taxpayer money.

Rescinding rule will be harmful to students.

Second, among the students I regularly work with, there is broad opposition to beginning a new rulemaking process and to scrapping the current gainful employment rule. Generation Progress has heard from several thousands of students who attended for-profit and predatory colleges over the years, many of whom have dealt with bad actors the Department could not hold accountable with newly proposed rule.

Generation Progress and the thousands of borrowers we work with and come here on behalf of, strongly oppose the proposed rule. This would allow students to fall prey to unscrupulous colleges that have profits, not students, in mind in their operations.

At Generation Progress we have heard from more than 9,000 students who attended for-profit and predatory colleges. We know that with a strong gainful employment rule in place, these stories will continue to tick downward. Gainful employment discourages the low-quality programs that have closed from returning, while ones with good results have

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Gainful Employment 12866 Meeting
June 11, 2019



nothing to fear. Simply disclosing information late in the application process is insufficient to protect students and taxpayers.

The Gainful Employment rule was needed.

Students, veterans, and taxpayers need protections from unmanageable student debt, sudden school closures, and waste, fraud and abuse in higher education. Students and taxpayers cannot afford a pared down GE rule.

Thank you again for your time and we ask that you keep students' lives in mind as you make your decisions.