

DEPARTMENT OF EDUCATION
OFFICE OF POSTSECONDARY EDUCATION
NEGOTIATED RULEMAKING PROGRAM INTEGRITY
AND INSTITUTIONAL QUALITY
SESSION 2, DAY 3, MORNING
FEBRUARY 7, 2024

On the 7th day of February, 2024, the following meeting was held virtually, from 10:00 a.m. to 12:00 p.m.

P R O C E E D I N G S

MS. K. SMITH: Good morning, everyone, and welcome back to session two, day three of the Department Program Integrity and Institutional Quality Committee Regulatory Negotiations. As usual, we will start off this morning with a roll call from our committee members. We will start with our nonFederal negotiators, beginning with our business officers from institutions of higher education, Joe Weglarz.

MR. WEGLARZ: Good morning.

MS. K. SMITH: Good morning. And alternate, Dom Chase.

MR. CHASE: Present.

MS. K. SMITH: Good morning. Our civil rights organizations and consumer advocates, we have Carolyn Fast as primary.

MS. FAST: Good morning.

MS. K. SMITH: Good morning. And Magin Sanchez. Oh. Alright. We didn't quite hear you, Magin, but I think we'll just work on your audio later to make sure that's working. For our financial aid administrators, JoEllen Price.

MS. PRICE: Good morning.

MS. K. SMITH: Good morning. And Zack Goodwin.

MR. GOODWIN: Good morning.

MS. K. SMITH: Good morning.

Representing historically Black colleges and universities, tribal colleges and universities, and minority serving institutions, institutions of higher education eligible to receive Federal assistance under Title III parts (a) and (f), and Title V of the HEA, we have Charles B.W. Prince. DC? Alright. DC is not in yet. D'Angelo Sands? Alright. I don't see D'Angelo yet, either. For our institutional accrediting agencies recognized by the Secretary, Jamie Studley.

MS. STUDLEY: Good morning. Hello.

MS. K. SMITH: Good morning. And Michale McComis.

MR. MCCOMIS: Good morning.

MS. K. SMITH: Good morning. Our legal assistance organizations, Robyn Smith.

MS. R. SMITH: Good morning.

MS. K. SMITH: Good morning, Robyn. And Sophie Laing.

MS. LAING: Good morning.

MS. K. SMITH: Good morning. For our private nonprofit institutions of higher education, we have Erika Linden.

MS. LINDEN: I'm here. Thank you.

MS. K. SMITH: Good morning. And Scott Dolan.

MR. DOLAN: Good morning.

MS. K. SMITH: Good morning. For our programmatic accrediting agencies recognized by the Secretary to include state agencies recognized for their approval of nurse education, Laura Rasar King.

DR. KING: Good morning.

MS. K. SMITH: Good morning. And Amy Akerson.

MS. ACKERSON: Good morning.

MS. K. SMITH: Good morning. For our proprietary institutions of higher education, we have Jillian Klein.

MS. KLEIN: Good morning.

MS. K. SMITH: Good morning. And Alyssa Dobson.

MR. COHEN: Should be David Cohen.

MS. DOBSON: I think.

MS. K. SMITH: I thought I saw her.

MS. DOBSON: Yeah, I'm here, but I'm from four-year public institutions.

MS. K. SMITH: Oh. I'm sorry. My apologies. Yes.

MS. DOBSON: Good morning.

MS. K. SMITH: For proprietary institutions of higher education, David Cohen, my apologies.

MR. COHEN: No problem. Good morning.

MS. K. SMITH: Good morning, David. Now, for public four-year institutions of higher education, Jason Lorgan.

MR. LORGAN: Good morning.

MS. K. SMITH: And again, Alyssa, good morning. For our public two-year institutions of higher education, Jo Alice Blondin.

MS. BLONDIN: Hello.

MS. K. SMITH: Good morning. And Michael Cioce.

MR. CIOCE: Happy Wednesday.

MS. K. SMITH: Happy Wednesday. For our state attorneys general, Diana Hooley.

MS. HOOLEY: Good morning.

MS. K. SMITH: And the alternate position is not filled. For state officials, including state higher education executive officers, state authorizing agencies, and state regulators of institutions of higher education, we have John Ware.

MR. WARE: Good morning.

MS. K. SMITH: Good morning. And Rob

Anderson.

MR. WARE: Rob's not here today. He had a family issue.

MS. K. SMITH: Okay, thank you. For students or borrowers, including currently enrolled borrowers or groups representing them, we have Jessica Morales. Jessi? Okay. I don't see her just yet. I think she will be joining us shortly. And Emmett Blaney.

MS. MORALES: Sorry, can you hear me?

MS. K. SMITH: Oh, yes. Okay. Jessi. Okay. Good morning.

MS. MORALES: I'm here. Emmett won't be here today.

MS. K. SMITH: Okay. Emmett won't be.

MS. MORALES: I just turned on the camera and I'm working on renaming. But I have internet today, so right now, we're at a win.

MS. K. SMITH: Alright. That is, we are winning. And finally, we have U.S. Military service members, veterans or groups representing them, Barmak Nassirian. Oh. Good morning, Barmak. And Ashlyn Haycock-Lohmann.

MS. HAYCOCK-LOHMANN: Good morning.

MS. K. SMITH: Good morning. Alright. For the Department today we have our Federal negotiator

is Greg Martin. Greg, if you just want to say good morning.

MR. MARTIN: Good morning, everyone.

MS. K. SMITH: Good morning. And we do know that leading our discussion today of R2T4, is Dave Musser from the Department. Good morning, Dave. And from the Department's office of general counsel, we'll have Denise Morelli.

MS. MORELLI: Hi, all.

MS. K. SMITH: Good morning, Denise. And Donna Mangold. Is Donna here?

MS. MANGOLD: Good morning.

MS. K. SMITH: Good morning, good morning. Okay. Before I turn it over to Dave for- to get us started with R2T4, we do have just two quick announcements. First, we are halfway through, so congratulations, everyone. We do want to just be mindful that we do have American Sign Language interpreters actively interpreting us. So if we can be mindful of that with our speaking pace. And also, since we are halfway through, time is of the essence. So remember a few things. To please keep your comments concise and germane to the issue at hand offering new ideas. And if we can try to refrain from piggybacking. And remember that there are multiple ways in which we can share information with

the rest of the committee members and the Department, including in the chat box, and through proposals and information sharing through Gmail. Alright, without further ado, I would like to turn it over to Dave Musser.

MR. MUSSER: Alright. Thanks, Krystil. So this morning, I think we'll dive right on in to return on Title IV funds if everyone is prepared to do that. And I think to get started, we will throw the issue paper up for everyone to review it. And I'll go through each issue, including the ones, for which, no changes have been made, just to make sure that everyone remembers what the Department's intent was and what we were doing with each of the items. So we'll start out with the change to 34 CFR 668.21, in which we amended the requirements for cases where a school disbursed direct loan funds to a student in excess of the charges for the institution and the student did not attend for the period that the disbursement was made for. Previously, the requirement was that we would- the school would provide information to the servicer, and the servicer would issue a final demand letter to the student, essentially requiring the student to repay the entire amount. And this change would alter that to have the student repay the loan under the terms of the master promissory note that the student had signed. I'll pause there and see if anyone has first, any

comments on this? And we have not made any changes to this provision.

MS. K. SMITH: Okay seeing none. I think we're free to move on.

MR. MUSSER: Okay. Well, actually, I think I'd like to take temperature checks on each of these items as we go through, just to have a sense of where everyone stands on each item. So if we could take a temperature check on this one.

MS. K. SMITH: Absolutely. Alright. And just as a reminder of how our temperature checks work. Thumbs up if you are in favor of the language as proposed. If you maybe have a few reservations, but you can still live with it, we're going to be a sideways thumb. And if you disagree with it and, you know, would like to mark that, you would go thumbs down. So let's see a show of thumbs if we can. Okay. Alright. I think we see yours, Jessi. I am marking that there are no thumbs down, so thank you for that.

MR. MUSSER: Alright. Thanks, everybody. I think then we'll move on to the next item. Thank you, Vanessa. And this is beginning the section on exemptions to a student being treated as withdrawn and therefore subject to the return of Title IV funds requirements. If you can scroll down a little bit

Vanessa? So if everyone recalls, previously, the Department had proposed to strike the exemption for students that complete a module or a combination of modules that comprise at least 49% of the payment period for which the student received Title IV funds. We heard some feedback that there were cases where this could significantly disadvantage students who only take, you know, a few courses, especially in summer terms, where it's actually quite frequent that a student might take only one course in one module and another course in another module, in which case the other exemption for completing a module within a payment period would not apply. And that, of course, is the exemption for completing at least half-time coursework in a payment period. So hearing the concerns posed by institutions and others, the Department has replaced the original language in this section that would provide that an exemption exists if a student completes a module or a combination of modules that comprise at least 49% of the payment period or period of enrollment. And I will pause there for a comment from the committee.

MS. K. SMITH: While we're waiting on comments, I do just want to note that the alternate for the HBCUs, HSIs and TCUs D'Angelo Sands has stepped in for the primary. And Jillian.

MS. KLEIN: Thanks. I just wanted to thank the Department for hearing the comments from the committee in January and reverting back to this language. That's all. Thanks.

MR. MUSSER: Thanks, Jillian. And I guess I should make one more comment. We did receive a proposal, I think it was intended to help assuage the Department's concerns about the burden associated with this calculation. The proposal was for us to make this optional, and we determined that we don't have the legal authority to do that. It's essentially an all-or-nothing proposition. Either we consider the student to be withdrawn in these circumstances or we do not. And so we have gone and simply replaced the provision. Alright. In that case, we'll take a quick temperature check on this one.

MS. K. SMITH: Okay. For 668.228 (a) (2) romanette 2 (a) (2). Let's see thumbs on that. It looks like we have no thumbs down for. Jamie? I'm sorry. Okay. No thumbs down for that. Thank you.

MR. MUSSER: Alright. Thank you, everybody. And I think we can move on to the next item, which is the second exemption that the Department had proposed on altering. And if everyone recalls in this instance, the Department has proposed to exempt from

consideration as a withdrawal and therefore the return of Title IV requirements. A student who, although they may have been in attendance on campus, the institution treats the student as if they never attended, the institution returns all of the students Title IV funds. The student-the institution refunds all institutional charges to the student, if you can scroll down a little bit, and the institution writes off or cancels any current year balance owed by the student to the institution due to the institution's returning of Title IV funds to the Department. So this was an interesting topic of discussion last time. What we heard was general support for the provision with some concerns proposed by schools who acknowledged that there were services and goods and other items that a student might purchase from the institution, including room and board, that the student did make use of for a period while the student was in attendance. And some of those negotiators proposed that we allow schools to leave some of those charges on a student's account and still qualify for this exemption. However, the Department's position is that the exemption is intended to treat the student as if they truly never attended and never had any costs for the period. And for that reason, we believe that writing off or canceling any balance owed from those charges is important. And we

don't believe that we can make exceptions to that and still consider the student to not have withdrawn. In those circumstances, we believe it's more appropriate to treat the student as a withdrawal and simply have the student- the school complete the R2T4 calculation for the student, and which would result in at least a small amount of Title IV funds, typically, remaining- the student remaining eligible for. But now I will pause there and open it up to the committee for discussion on this point.

MS. K. SMITH: Jason?

MR. LORGAN: Thank you. So I just have a question or a clarification around this. So the revised text indicates when a student is not considered to have withdrawn, but if the text is passed, then would those institutional debts paid by loans now be refunded to the student? This seems like it could be an unintended consequence of the changes in both sections. Thank you.

MR. MUSSER: So this is a circumstance where the student is treated as a non-attender and the student received loan funds and because they're treated as a non-attender they would therefore simply repay the loan as part of the MPN. Is that the question? Got it.

MS. K. SMITH: He's nodding his head.

MR. MUSSER: So in these

circumstances, and I'll make sure and turn to my Department colleagues to make sure that they agree with me. But I believe our intent was that the Department—that the institution would return all of the student Title IV funds for the period, including amounts that the student received, in excess of institutional charges. Such that there would be no loan funds remaining that the student had incurred as debt for the period in question. So the provisions of 668.21 that we referred to earlier would not apply in these circumstances because there would be no loan funds that fell into the category of remaining debt that the student was then responsible for.

MS. K. SMITH: Any other comments on this section before we do a temperature check? Okay seeing none. Let's do a see thumbs for 668.22 (a)(2) romanette 2 (a)(6) and (7) with a strike-through.

MS. K. SMITH: Alright. I am. Jamie? Okay. Looks like there are no thumbs down for that one. Thank you.

MR. MUSSER: Okay. Thank you, everyone. And then I think we can move down to the final exemption under discussion. So can we scroll up a little bit, Vanessa? For just first to talk through what we had previously proposed. The Department had originally proposed to not consider a confined or incarcerated

individual to have withdrawn in certain circumstances where the student was forced to cease attendance for reasons outside the student's control. What we heard from the committee was that there were some concerns with that proposal for several different reasons. One of which being that, some institutions have already have established generous refund policies that incorporate the concept of R2T4, meaning that they make students whole in these circumstances with the understanding that students are not likely to be able to repay amounts that get returned or work through institutional debts that result from the R2T4 process. We also evaluated this from a legal perspective, and ultimately, we determined that we don't believe that we have the ability to fully consider a student who have not withdrawn if they have begun attendance and none of the other exclusions apply. For that reason, we have struck the original proposed language here. But we have introduced another set of changes that we hope will at least- that will address some of our concerns about these situations. So, Vanessa, if you could scroll down just a little bit here. So we are proposing a new condition under the leave of absence regulations under 34 CFR 668.22 (d) that are targeted at confined or incarcerated individuals. And this is essentially intended to allow these individuals to return

to their coursework in a more flexible way. If they, especially if they experience one of these instances where they are unable to complete their coursework due to circumstances outside their control. So if you scroll down to the language that we've introduced here, this is under 668.22 (d). Approved leave of absences allow an institution to temporarily place essentially the student, the way I think of it is, in a holding pattern if they meet certain criteria. Generally, it requires that the student submit a request to be placed on the leave of absence in accordance with specific policies that the institution has established, although in certain circumstances if there is an emergency, the student can be placed on a leave of absence after the fact as long as the school has adequate documentation of the circumstance. However, in term-based programs, there are some very strict limitations on when this can be used. Typically, you don't see leaves of absence in term-based programs because they're of the requirement that you see here under (d) (1) romanette 7. Which is that, the only way that you can allow a student to go on a leave of absence currently in a term-based program that does not include a subscription-based program is if, upon the student's return, they are permitted to complete the coursework that they began prior to the leave of absence.

In the vast majority of cases students who are in term-based programs, if they withdraw, they withdraw from all their coursework and they simply return in a new term, generally starting new classes. There are exceptions. There are cases where schools are able to make that work. But it's our belief and understanding that it's quite rare. So we have in this iteration of our proposal, we have added another exclusion to this limitation, to say that if a student is in an eligible prison education program, the school has more flexibility, including, in term-based programs, to allow the student to return to coursework that starts later on without necessarily completing the coursework that they began prior to the leave of absence. This would allow the school to, for a period of time, allow the student to be out for whatever reason. Again, it could be because the facility in which they are incarcerated has locked down, there could be other medical reasons the student is out, but in any event, as long as the student is able to return to coursework within 180 days, which is the time limit for leaves of absence overall, the student could resume without being treated as a withdrawal in these circumstances. So let me pause there and see if there are questions or comments from the committee before we talk through it.

MS. K. SMITH: Looks like we're good on that one, Dave.

MR. MUSSER: Okay. Seeing no other comments or questions, we'll take a temperature check on this new language.

MS. K. SMITH: Okay. So let's see our temperature check for 668.22 (d). Can I see thumbs? Okay. Just one. Jamie? Jamie? I don't know.

MR. ROBERTS: Looks like our internet might be out. I'll reach out to her.

MS. K. SMITH: Okay. But outside of that, there are no thumbs down for that. And she looks like she's good too. Alright.

MR. MUSSER: Alright. In that case, I will move on to the next item. As a reminder, this was the proposal that the Department made last time. We did not make any changes to this one. In this one, we specified that in cases where a student has entered a second or subsequent payment period in a clock-hour program, the- sorry, let me go back, that's the wrong provision. In this one, we are codifying a long-standing policy that if a student withdraws from a program that is required to take attendance, they must, within 14 days of the last date of attendance, document the student's withdrawal date. And essentially that means that the

clock starts for the return deadlines for that student no later than 14 days after the student's last date of attendance. And I'll pause there again and ask if there's any discussion on this point.

MS. K. SMITH: Okay.

MR. MUSSER: Zack has questions.

MS. K. SMITH: Oh, okay.

MR. MUSSER: I see it in chat.

MS. K. SMITH: Alright, so Zack Goodwin is coming in?

MR. GOODWIN: It was actually about the next item. So I will go off camera for me.

MS. K. SMITH: Okay. Hearing no questions or comments, we will take a temperature check for 668.22 (b) (2). If we can see thumbs for that. And Joe Weglarz? Okay. We have accounted for all the thumbs. No thumbs down. Thank you.

MR. MUSSER: Thanks for that. In that case, Vanessa, I think we can move on to the next item. In this section, we are dealing with the withdrawal date for a student who withdraws from an institution that is required to take attendance. Originally, as you guys recall, the Department proposed here to require attendance taking for students who were enrolled in distance education coursework. However, the draft

language referred to a program offered through distance education. We heard from the committee that there were some concerns with that drafting and especially that it suggested that enrollment in even one course or even any distance education could cause an entire program to be treated as distance education. That was not the Department's intent. So we did revise the language here to refer to a distance education course. However, I want to remind the group of our discussion yesterday. We have- we were considering adding a definition of a distance education course. And if we do so, I think that would also be the term that we used here rather than a course offered entirely through distance education for consistency's sake we would use the term that is established elsewhere in the regulations that would apply more broadly for this purpose. We did receive some- a proposal that certain kinds of programs be exempt from this requirement. However, it is the Department's view that distance education, generally, should be subject to this provision for the reasons that we previously described. We believe that such programs generally have a better ability to record course assignments as well as interactions between students and instructors, which are part of the requirement for regular and substantive interaction in distance education programs. That's the

criteria that separates them from correspondence courses. And therefore, we have not made any changes to the types of programs that are subject to this. It would be, any course offered through distance education. And I'll pause there and ask for discussion from the negotiators.

MS. K. SMITH: Alright. Before I take Jillian, Zack Goodwin is coming in for the financial aid administrators. Jillian?

MS. KLEIN: Thanks. I'll get fighty separately on types of programs, but so I think we had this conversation in January and part of what I submitted in a proposal was trying to fix what I think is still clunky language. So I don't know if you want to bring the proposal back or the language back up or you don't have to, I guess. But the way this still reads to me is that if an institution offers one course via distance education, the entire institution is required to take attendance. And I thought we talked about this in January and I thought the Department said that wasn't the intention, but the language still says that. So I guess I'm struggling. Maybe I'm misunderstanding what the Department is intending here. But that feels different than the conversation we had in January.

MR. MUSSER: That's understandable. So on this point, if you look at the language for the other

provisions, they all say the same thing, which probably is also confusing based on what kind of the way that it reads. But the Department's historical interpretation has been that this applies on a much more granular level and not to the institution as a whole. So, for example, if you look at (b) (3) romanette 1 (b), the institution has itself has a requirement that its instructors take attendance. That would apply only in cases where, for example, in a particular program the institution required its instructors to take attendance. But if it did not require instructors to take attendance in other programs, the Department would not apply the attendance-taking requirement to those other programs. So we mirrored the language that exists elsewhere in this provision for this. And we would apply the exact same approach, which is to say that, this only applies in cases where the student is taking a course through distance education. And I want to pause for a second and also return to a discussion that we had last time about how this would be done. In cases where a student is taking some courses through distance education and some that are not through distance education. In a payment period or a period of enrollment where the student is taking both distance education courses and courses that are not offered through distance education and do not otherwise have

attendance-taking requirements, that student is treated as a nonattendance- is not required to take attendance for that period. Because the presence of one course for which the school is required to take attendance does not give assurance that the attendance is accurate for the student for the entire period if there are other courses that the student is taking for which attendance is not required. So this really only applies in cases where the student is enrolled in all distance education courses for a particular payment period or period of enrollment, or in cases where the student is enrolled in a combination of classes for which that are distance education, or where one of these other attendance taking requirements apply.

MS. KLEIN: So I hear what you're saying, but with all due respect, I think current (a) (b) and (c) actually do speak at an institution level. And so this actually feels like an outlier to me in terms of the construction. But I guess, you know, putting that aside, I guess if you guys are already making changes to this language, why wouldn't you just change an institution is required to take attendance to actually reflect what the Department's intention is? As opposed to saying, we'll have this language and then give guidance that it actually doesn't mean what it says. I guess I would just

suggest clarity because I think it reads really clunky. And, Dave, I trust you and you're sitting here and telling us your expectation for institutions, but I don't know that the guy after Dave is going to feel the same way. So I guess, respectfully, I would just say I think it would make more sense if you would actually just edit the language to say what it is you're saying right now.

MR. MUSSER: We can consider that. And I acknowledge that the language has been interpreted over time in a way that does seem different from the drafting of it. And you can find those things in our preamble discussions of the other provisions throughout time. But I do acknowledge that it might be a good idea to amend the actual technical language here. We were frankly hoping not to introduce too many additional changes which where we could make other mistakes. But we will look at it from a legal perspective and decide whether it's worth doing that. And I appreciate the suggestion.

MS. KLEIN: Yeah. Thanks. I would just urge the Department to avoid regulating via preamble, if possible. Thanks.

MS. K. SMITH: Thank you. Zack?

MR. GOODWIN: I think in light of some of the discussion with Jillian. But now my question may have changed slightly. I think I have heard over the

course of the years because you have tended to- the Department has tended to be very flexible about how we interpret required to take attendance for students. A school could require it across the board. It could require it for certain programs, for certain courses, for certain parts of the payment period, even. And there has been, at least in my interpretation, some flexibility around, if a professor of their own volition, let's say, chooses to take attendance that were considering that course, perhaps as a required to take attendance type, of course, and we could then rely on those attendance records for determining a withdrawal date. Not that we were necessarily required to do that, but that was still something we could do. Is that, given that debate here between required to take attendance and cases where attendance may be taken but not required to be taken. Could we still for this online course, rely on those attendance records in the absence of other information?

MR. MUSSER: Yes. So, that's a great question, Zack. There's a separate provision that permits an institution to refer back to its records, its attendance records for the student. And even in cases where the student might be enrolled in some courses that are attendance taking in other courses that aren't, the school can use its best judgment to use the attendance

records that it can find for that student. And I'll give an example of how that would probably play out here. You would have, for your distance education course, you would have attendance records presumably that are accurate, since if the school is complying with this for this to become regulation. But you would also probably go back to the other nonattendance taking classes and ask the instructor for whatever records they could provide. And then you would use the record for the last date- the furthest into the payment period that you could determine that the student attended based on the combination of all those records. Now, that student for that period is not considered to be at an institution required to take attendance. So you're not required to use those records. But a lot of schools do. A lot of schools choose to give the most accurate representation of the student's attendance for the period out of a sense of fairness and accuracy. So that would still be fine here.

MR. GOODWIN: Okay. Thank you. I more wanted to be sure that that option was retained. Thank you.

MS. K. SMITH: Thank you. Just to note, that Scott Dolan is coming in for the private nonprofit institutions. Jason?

MR. LORGAN: Thank you. So I just

wanted to provide a little more context about what I think is unclear about the language. So financial aid is not my subject matter expertise. So I consulted with the ten financial aid directors in the UC system and also the UC system headquarters. And there was- and everyone agreed that they believed that the way the regulations are currently written, includes the entire institution versus an individual course. So I realized that you just said that it does not. But I wanted to, you know, reiterate that I really do think that it's perceived that it's the entire institution, the way it's written. Thank you.

MR. MUSSER: That's good to know, actually. I think that gives some additional support to Jillian's suggestion that the Department amend this language to be more specific about what we intend here. And I think we're willing to go back and take a look at that.

MS. K. SMITH: Scott?

MR. DOLAN: I guess just given that the context for the changes was around simplicity. I think some of the conversation we're having here maybe might beg the question about whether or not how it's written is making things simpler for institutions, especially if it's going to be left open to

interpretation. And I know some of the constituents within our group have raised some concerns around, you know, what this would look like in practice, where, an institution might use multiple learning management systems and have different components of this. Right? So having those speak to their financial aid systems and address it. And I hear the openness to flexibility of interpretation but I think, you know, I have some concerns about whether or not it's really as stated, helping the Department meet its intent, if the intent is really just about simplifying the process and not something else. Right. Because there were some conversations earlier in the first session about potential noncompliance, but there- and there were some at least brief discussions about where that might have occurred, but not a whole lot of data and evidence to support the noncompliance side of [inaudible]. So that would just be another suggestion. If it's more than simplicity to maybe provide a bit more of a rationale and justification for moving in this direction, given the fact that it will at some institutions become more complicated to implement.

MR. MUSSER: Understood. Thanks, Scott. I do want to make a note from our original discussion that the Department's intent here is both to

improve the clarity of the regulations and the simplicity of the requirement, but also to improve the accuracy of return of Title IV calculations. Part of the simplicity piece of this is that the guidance that the Department has previously published on whether an institution is required to take attendance for distance education coursework is actually focused on 668.22 (b) (3) romanette 1 (b). And actually, maybe Vanessa, if you could quickly bring up the language just so everyone can see that item. I want to make sure to make sure I explain the context here so that everyone understands. I don't know if Vanessa is able to, oh, there she is. So (b) is the requirement that if the institution itself has a requirement that its instructors take attendance, they are considered in attendance taking institution. So as I mentioned, the Department has interpreted that in a much more granular level than it seems to be to read here. And in guidance, we specified that there were cases where if an institution was recording a student's activities in a particular course, and those activities rose to the level of academic engagement, meaning that they were not merely log-ins, but they were more substantive activities such as submitting assignments, that kind of thing, then they would be considered attendance taking. But if they weren't, if they were merely log-ins, then they would not

be attendance-taking. We revised that language, more recently to focus on synchronous sessions where attendance might be taken or cases where the institution was using the attendance data for purposes of maintaining enrollment and potentially removing a student who was a non-attender. But in any event, this has been a very confusing set of- area for institutions. And many institutions have told us over time that they didn't understand whether they were or were not subject to attendance-taking requirements for this provision. So that's the broad argument for making this change for simplicity. But I do hear you, Scott, on your request for more data on specifics. As I mentioned with the asynchronous clock hour issue, it is sometimes difficult for the Department to dig down to the level of very specifically which part of the R2T4 requirements were violated. We do have findings codes that allow us to get at broadly which ones are which and we will try to dig down and see if we can get you some more examples of how this has gone awry in the past as well. But that is the- what I just described is the broad reason that we are trying to make this clearer. And we also believe, as I mentioned, that this will make calculations much more accurate in cases where schools were already obtaining much of this data through their distance education LMS.

Especially since in many cases, the assignments, etc. are being submitted directly to the institution and have to be submitted through that format in order for them to track the student's progress in a class. So I'll pause there and go back to other committee members.

MS. K. SMITH: Okay. Thank you.

Barmak?

MR. NASSIRIAN: Yes. I guess I'm a little concerned about the formalism of attendance-taking. Mainly because to the extent that there are audit trails that satisfy the Department's requirements. Those audit trails are presumably more reliable. You know, the recording of a data withdrawal is entirely and unilaterally within the power of the institution. And it would be nice if the idea is to create a reliable evidentiary basis for the determination of the exact date of nonattendance in a course to the extent that alternative, more reliable, real-time audit trails that satisfy the academic engagement requirement are available. I think those should be deemed very explicitly as the superseding evidence of the date of attendance. I'm just worried that institutions may have reasons to record dates of nonattendance that may be different than what the student believes, and I don't know what the remedy would be for the student to go back to the

Department to request greater investigation.

MR. MUSSER: Thanks, Barmak. I guess I'm- I think I'm- first, I want to be sure I understand your point and the issue that you're focused on. Are you concerned primarily about what we were just discussing with Zack, where the school can use other records from courses that it's not taking attendance in or required its instructors to take attendance in to determine the student's withdrawal date?

MR. NASSIRIAN: I'm just concerned that the idea of creating a proxy in the form of a notational mandate on the schools gives the school unilateral power in some ways to put a date down when there are- and that may be the only remedy we have when there is nothing else there, right, in a face to face setting where the faculty actually takes formal attendance, that's all you got. But in cases where you have systems with audit trails that retain information about student participation, engagement with the faculty, with the course material, etc., etc., I think those should be- those should trump some notational entry by unilaterally by the school that claim a particular date of nonattendance. For what it's worth, I don't know what you can do with it, but it's sort of, I'm just suggesting that there are more reliable evidentiary bases for

determining these dates than just what the school records and reports to the Department.

MS. K. SMITH: Denise's hand is also up. I don't know if she wants to weigh in.

MR. MUSSER: I'll let Denise go first.

MS. MORELLI: So Barmak, in situations where our program reviewers, at least that's what I deal with, are going in and looking to determine whether the last date of attendance is accurate for the return calculations. They are looking in the LMS system, if that's what you're talking about, rather than, in fact, I've had cases where there might be a different- the Alma System might be set up here, and then it gets transferred, and we haven't accepted the transfer over where an individual is now putting in some kind of master attendance. So from the program view perspective, I don't know about the auditors, the Department is looking back at what you're talking about, I think is more reliable and right in the system to see where we can see academic engagement. So we are looking behind that as policy in FSA.

MR. MUSSER: Yeah. And thank you, Denise. And I think, I mean, I think Barmak, you're speaking to an issue that frankly, has always been part of the return of Title IV process and a concern of the

Department's from the very beginning. Back when before there was really distance ed used broadly, we were forced to rely on attendance records that instructors kept that may or may not have been accurate. And still to this day, if they're not required by the school to take attendance, we don't have a whole lot of ability to really dig in any further to see if the attendance- the instructor was taking good attendance, if he was really monitoring who was there when. And the Department's position for many years has been that we rely on the institution, ultimately to make this call. That said, if we received a complaint from a student that asserted that the school had essentially established a date that was too early or too late, I guess it could be either way, for the student and the student argued that they didn't submit something, or that they did and the school didn't record it. We would still pursue that with the school. And as part of the complaint resolution process, we would take that all the way to the school to ask them to go into their records and evaluate it. But there is, I think, a certain- there's a certain level of accuracy the Department just cannot get down to without the support of the institution. But we frankly believe that this will help us because it will turn institutions toward use of their LMS systems in cases where it's clear that they had

to use that to track a student's attendance. But I'm not sure how much further we could go to resolve the broader issue of cases where there is no particular requirements. We would certainly ask them to look at the best available data and that's been our position. But there are cases where that may not be possible.

MS. K. SMITH: Thank you. Just to note that Erika Linden will step back in as primary. Robyn?

MS. R. SMITH: Hi. Thank you. I just want to thank the Department for proposing this provision and say that we strongly support it because as the legal aid folks we've seen a lot of abuses in this area. And I'll just give one example. We had a client who enrolled online at the University of Phoenix and she couldn't attend a single day. She couldn't even log on because she lacked the equipment necessary to do so. But the University of Phoenix never returned any Title IV funds and she eventually, even though she thought she had withdrawn and told them that, she was disabled and eventually was having her Social Security disability income garnished to repay defaulted loans. And when we tried to get through a FERPA request, tried to get student records of login attempts, sort of to substantiate an unpaid refund discharge we had a very difficult time getting those. So I say this is very, very

helpful to students. And I would ask the Department to consider a guidance or something clarifying that students should be able to access their login records when they do FERPA requests, that those kinds of records are included in student records available to students. But, again, really appreciate this provision. Things.

MS. K. SMITH: Alright. Erika?

MS. LINDEN: Thank you. This may just be because I have a lot of gray hair and I don't remember from our January meeting. But it did occur to me in my notes that we referenced students, for example, in Ph.D. programs who may- how was attendance to apply to a student in a Ph.D. program who is away from the academic environment, but working diligently on dissertation and things like that, where there might not be those touch points. And I just don't recall where we landed last time and I don't see any notes here about that. So if that's something Dave, you can clarify. I'd appreciate it. Thank you.

MR. MUSSER: This is a very good question. So doctoral dissertations are an area that the Department traditionally has handled a little bit differently than other kinds of coursework. I think there's an acknowledgment that although there typically is interaction and there is an expectation of regular

interaction between students and their advisors which we would interpret as instructors during these periods. Coursework is not carried out in exactly the same way during dissertations. We did hear the concern from the group that the concept of distance education, you know, may not apply in these cases. I think that right now, the Department's view is there's one of two things happening in an institution's dissertation coursework. Either the student is not actually interacting with their advisor instructor on a frequent basis and or the institution is not recording that interaction. In which case the course might be a correspondence course rather than a distance education course and this would not apply, but other requirements would apply. Or the institution is recording the interactions that the student has with their instructor or advisor and the dates of those interactions in an effort to ensure that they're meeting the regular interaction requirements for a distance education course. In that case, we would still apply this requirement here because there is an expectation that the school is recording those interactions.

MS. K. SMITH: Thank you. Jillian?

MS. KLEIN: Yeah, I can put my hand down. My question was a similar statement to Erika's. I mean, I think just to reiterate the proposal I sent you

guys that you didn't like. I think there are concerns functionally in terms of how doctoral programs especially in sort of late-stage dissertations are handled here. And I should say and I think, I mean, the Department knows this, we, I mean, at Capella, we've been taking attendance since before it was a requirement for sure because we have those LMS records that have tracked every action that a student is taking in a course. So I think in theory, functionally, I don't have concerns with the Department sort of codifying what I have understood to be long-standing guidance from the Department that if the institution has this data, they should be using it for R2T4 purposes anyway. So in general, I totally agree with this approach, but I do think it's challenging when we talk about some of these specific program, either types or elements within a program like doctoral programs. And I have not completed one, but I think some of these negotiators have, I'm guessing probably Jamie has. I know I'm sure Laura has. I think, Scott's off-camera, but I know he has a doctoral degree. I think they can all speak to how the dissertation phase is different. In terms of what that interaction is between the student and the institution. And, you know, just to be frank, like, certainly institutions can build in low-value academic attendance requirements in those programs to meet this

requirement. But I think it disadvantages students ultimately because they're not going to feel like- or they're not going to readily know, like, oh, I need to go in every 14 days and do this thing because of this Department requirement. And so I guess I would just push back again and ask the Department to consider the proposal that I sent. Which is not asking for the Department to not take this approach, but to really consider in the doctoral space. And I know I'm the only person, I know I'm the only person in this whole group that cares about direct assessment programs, but it's very similar there. Especially because the Department is really scrutinizing the programs that get approved for direct assessment. You guys signed off on every element of the way that we get aid to students in those programs, including how we handle attendance. And so I would just ask the Department to think again carefully about those aspects with respect to this proposal.

MS. K. SMITH: Thank you. JoEllen.

MS. PRICE: So I just want to say I'm at a school that also takes attendance and I agree with everything Jillian just said. I don't have concerns. But I'm trying to think logistically how this is going to work for schools that do not, that they don't take attendance. So my question is, Dave, for schools that

don't take attendance, but they have online programs that have that online interaction with the student and record that information. If the student were to withdraw officially on one date, are you saying this financial administrator has to go back to look at those online recorded records? Can they use that official withdrawal date or now they have to go back and find those records of when the student last interacted online with their whatever process they're using at the school?

MR. MUSSER: That's a great question.

MS. PRICE: Can you clarify that for me?

MR. MUSSER: Yeah. Yeah. The answer is that if the student is enrolled entirely in distance education courses, again, under this provision, under this proposal, if they were enrolled entirely in distance education courses or a combination of distance education courses and other attendance-taking courses, the institution would be required to go back to actual records to determine the student's withdrawal date. You couldn't simply use the official withdrawal date. Because, as you know, students often attend, you know, days after the official withdrawal date, days prior to the official withdrawal date. For attendance-taking programs, the school always has to use the last date of

attendance as they define in there- as they determine from their records.

MS. K. SMITH: Okay. Is there any more discussion on this section before we go to a temperature check? Okay, hearing none. I think we are ready for a temperature check on 668.22 (b)(3) romanette (i)(d). If we can see thumbs on that. Looks like we do have one thumb down. Jillian, did you want to add anything that you haven't already talked about? Okay. Thank you. We have marked that. And we are ready, Dave, today to go on to our next section.

MR. MUSSER: Yeah. Thank you everybody for the very interesting discussion. I think the Department does have a few things to think about on that provision. Vanessa, I think we can go on to the next one. And that takes us down to 668.22 (f). This is the provision that I thought I was talking about earlier, relating to clock-hour programs and students who have reached the second or subsequent payment period in those programs before withdrawing. So if you can scroll down, just for a moment here. In the case of a program that is measured in clock hours by dividing the total number of clock hours in the payment period or period of enrollment into the clock hours scheduled to be completed. And we have added, since the student began attendance in the

payment period or period of enrollment as of the student's withdrawal date. And again, I'll go back to, hopefully people will remember this rather complicated explanation for why we're doing this. There are currently two different ways, legitimate ways, for schools to interpret the existing regulatory language, and that is to simply add up the scheduled hours without consideration for when the student actually reached the next payment period. We are specifying here that scheduled hours in a payment period don't begin counting until the payment period actually begins. Which is to say, the day that the student successfully completes all of the hours in the prior payment period. I'll pause there for any discussion on this one.

MS. K. SMITH: Any comments or discussion? Okay. Seeing none. I feel that we are ready for a temperature check on section 668.22 (f) (1) romanette 2 (a). Can we see thumbs on this section? It looks like we have everything marked. No thumbs down. Thank you all.

MR. MUSSER: Thanks, everybody.

MS. K. SMITH: Let's go on to our next section.

MR. MUSSER: Alright. And then the last item here. This was a change to the way that the

Department determines when the days in a module are included in the denominator of the return of Title IV funds calculation. We previously discussed that the current process, we have heard from institutions is somewhat complicated. It involves additional administrative steps to determine whether, first, there is an R2T4 freeze date that the school uses to determine when to freeze the days that they would include in the denominator. As well as if the school is not using that, a determination of at the end of the period what the student was scheduled to attend throughout the period. We believe this proposal will substantially simplify that process by simply saying that the days in a module are included in the denominator of the calculation only when the student begins attendance in the module. And because schools generally do identify attendance in a module at least once, for Pell Grant purposes, and/or general purposes, at least once during the payment period, most institutions are already collecting this information and would be able to do this without a substantial amount of additional burden. I'll pause there and ask if there's any additional discussion on this one.

MS. K. SMITH: Okay. If there is no additional discussion, we'll do our final temperature check for R2T4. That's 668.22 (i) (9). Let's see a show of

thumbs. Okay. Alright. Thank you all so much. And thank you all so much for your discussion today. An excellent use of the chat box as well. Our next topic is going to be accreditation, which we can roll right into. I- okay. Denise?

MS. MORELLI: I just wanted to let everybody know I'm going to be stepping back and my colleague, Donna Mangold will be now at the table, as we call it. And in case there's anybody wondering, Dave and I have been getting off camera when there's votes so that the facilitators can see only the voting members. So if anybody out there was wondering why we keep getting off, that's why.

MS. K. SMITH: Thank you. And thank you so much. Oh, David?

MR. MUSSER: I was just going to say the same thing. I will be stepping back and letting my colleagues from the accreditation group come to the table. Thanks, everybody, for the great discussion today.

MS. K. SMITH: Thank you. Coming to the table on behalf of the Department to lead us is Herman Bounds. Good morning, Herman. And at this point, I will also turn it over to our FMCS facilitator, Cindy Jeffries. I will take a step back and Cindy will take over as facilitator. I thought I saw another hand. Did I

not? No. Okay.

MS. JEFFRIES: Thanks, Krystil.

MS. K. SMITH: Thank you. Take it
over, Cindy.

MS. JEFFRIES: I just want to mention
that, Greg Martin, as the Department negotiator and
Herman Bounds will be both at the table for the
accreditation portion that we're about to embark on.
Seeing no hands before we get started. Jamie? You're on
mute, Jamie.

MS. STUDLEY: Thanks, everyone for
pointing out my signal problems. I have switched to three
new forms of technology. Let us hope. Second, I would
like to ask for a caucus at this point before we launch
into this topic. And I would like to invite the state
negotiators and all of the institutional representatives.
To my eye, but I don't have that list open in front of
me, that includes the representatives from the HBCUs, MSI
and tribal colleges, two and four-year institutions,
proprietary institutions, business officers and financial
aid administrators. If there's anyone representing
institutions and I have forgotten that category. Our
purpose in doing this is we would like to understand the
effects of some of the provisions that we're going to be
discussing so we can facilitate the conversation and

anticipate where there are some things that might impinge on institutional considerations so that we can be aware of them and well prepared for the conversation that we will all have together. I don't want it to seem like- I think it's important that we all hear all perspectives, but we would like to be informed by talking to these particular entities if they are willing to join a caucus. I'm thinking- we wondered 25 minutes? 30, if you want to round it?

MS. JEFFRIES: Yeah. That'd work fine. Let's do this. I do know that you asked if you had missed anyone from institutions. I think private nonprofit was inadvertently not mentioned. Was there anyone else you wanted to add, Erika? Okay.

MS. STUDLEY: Sorry, I meant I just- when I was thinking.

MS. JEFFRIES: Yeah, well we're going to ask everybody to raise their hand here that's willing to participate in a minute. Laura?

DR. KING: Jamie, you didn't mention all of the accreditors either, so I just wanted to make sure you mean all of the accreditors.

MS. STUDLEY: Of course. When I did that, I actually was speaking on behalf of Laura and Michale as well in calling the caucus.

MS. JEFFRIES: Okay.

MS. STUDLEY: I haven't done that step before.

MS. JEFFRIES: So, Brady, if you want to assist here, and I think we'll have to have everyone turn on their camera so that we can see hands. Alright, so show us your hands if you are participating in this caucus so that we can do a call-out for the record. I'll give it a minute here because it keeps jumping around. So I'm showing at this moment Scott Dolan, David Cohen, Jillian Klein, Alyssa Dobson, Laura Rasar King, JoEllen Price, Amy Ackerson, Jason Lorgan, Erika Linden, Dom Chase, let me know if I'm going too fast, Brady, Jo Blondin, Zack Goodman, Jamie Studley, Michale McComas, the D'Angelo Sands, DC, Joe Weglarz, Michael Cioce, let me switch pages here. Alright, did I miss anyone?

MS. HOOLEY: Can I just quickly ask for clarity? I wasn't sure if at the top you mentioned states as well or if I just misheard you. But I just wanted to clarify.

MS. STUDLEY: I was inviting the state regulators.

MS. HOOLEY: Got it. Okay, it cut out on my end, so I just wanted to make sure I wasn't- yeah, okay. Thank you.

MR. ROBERTS: I think we did miss John Ware as well, but John, I'll send you an invite.

MS. JEFFRIES: Thank you. Okay. So that is who will be caucusing. I showed as 11:06. Let's do a check-in. Jamie will check in with you at about 11:35 and see how you're progressing. David, do you have your hand up with a question or just still from. Okay, great. Thanks.

MR. ROBERTS: I think we should be good. Let me know if anyone whose name did not get an invite there's a bunch of folks so I might have missed someone, but I think we are okay.

MS. JEFFRIES: Okay. So with that, we can pause the live stream. And welcome back, everyone the caucus parties have returned. At this time I'm going to ask Jamie who called the caucus if they have anything they would like to report out on.

MS. STUDLEY: You know, thank you very much, Cindy. And thank you, everybody, for the indulgence of the time. I think that the comments that we had were helpful in us reviewing some of the specific provisions and that the interchange in the caucus would be most helpful if people just discussed their viewpoints as we go through provisions that have some interactive effect between accreditors and institutions. So, nothing to

report except a friendly conversation that we think might be helpful in exploring some of the topics that we'll be coming to.

MS. JEFFRIES: Well, good. Thank you for that, Jamie. I'm glad you were able to make good use of the caucus time. With that being said, are there any additional comments before we start? Barmak?

MR. NASSIRIAN: Yes. Given the time, I would like to request a caucus with all of the committee members that were excluded from the previous caucus. They can just raise their hands, maybe to self-identify for your convenience. And hopefully, we can get it done before lunch so that the proceedings can start immediately after lunch.

MS. JEFFRIES: Okay. So, Brady, I'm calling on your assistance. That would be, Barmak, Carolyn, Robyn, Jessi Morales, Diana Hooley, Magin Sanchez, Sophie Laing. Am I missing anyone?

MR. NASSIRIAN: Yes. The Department.

MS. JEFFRIES: Oh, you want the Department? Okay. Greg?

MR. NASSIRIAN: They are negotiators.

MR. MARTIN: Sure. Absolutely.

MS. JEFFRIES: Okay. So you would like Greg and Herman. And would you like Donna in there as

well?

MR. NASSIRIAN: Absolutely. Of course.

MS. JEFFRIES: Okay. Anyone else in the Department besides those three?

MR. NASSIRIAN: Anybody that the Department chooses to bring is obviously the Department is.

MS. JEFFRIES: Greg, did you want anyone else from the Department besides the three of you?

MR. MARTIN: I will leave that up to our supervisor, Antoinette Flores, as to whether she wants to have anybody else. I don't know yet because I haven't communicated with her just yet but she'll be with me about anybody else she wanted to include from the Department. Right now, it would be Donna, Herman, and me. And then if Antoinette chooses to add somebody, I'll let you know.

MS. JEFFRIES: Okay. Sounds good. So, it is 11:45. Let's plan on all doing this caucus. We will incorporate the lunch break during that and we will resume back here at 1:00 to start in with the accreditation discussion. Okay? So with that, if we pause the livestream and move people into the caucus room, I'd appreciate it.

MR. ROBERTS: Yep. You all should be

getting invites to room six right now.

Zoom Chat Transcript

Program Integrity and Institutional Quality- Session 2, Day 3, Morning, February 7, 2024

***Chat was copied as presented, as a result minor typos or grammatical errors may be present.**

From P, DC, HBCUs, MSIs, TCUs to Everyone:

HBCU Alternate will be stepping in for this discussion

From P. JoEllen Price, Financial Aid Administrators to Everyone:

Thank you!

From A, Scott Dolan, Private Nonprofit IHEs to Everyone:

Reacted to "Thank you!" with 👍

From P. Jo Blondin, Community Colleges to Everyone:

Reacted to "Thank you!" with 👍

From (A) Zack Goodwin (he/him), Financial Aid Administrators to Everyone:

Reacted to "Thank you!" with 🙏

From P, Jamie Studley, Institutional Accreditors to Everyone:

im here and was thumbs up

From P. JoEllen Price, Financial Aid Administrators to Everyone:

Zack has questions

From P. JoEllen Price, Financial Aid Administrators to Everyone:

Sorry

From P. JoEllen Price, Financial Aid Administrators to Everyone:

Zack will come to the table for FA Administrators for this section with Questions/Comments.

From A, Scott Dolan, Private Nonprofit IHEs to Everyone:

Agreed with this sentiment about need for more clear language and intent. This seems to make institutions attendance taking if they offer one course

From A-Alyssa Dobson, 4Yr. Public Institutions to Everyone:

Reacted to "Agreed with this sen..." with 👍

From P. Jo Blondin, Community Colleges to Everyone:

Reacted to "Agreed with this s..." with 👍

From P - Erika Linden, Private Nonprofit Institutions to Everyone:

Reacted to "Agreed with this sen..." with 👍

From A, Scott Dolan, Private Nonprofit IHEs to Everyone:

agreed with Jillian here. why leave it up to interpretation

From P. JoEllen Price, Financial Aid Administrators to Everyone:

Reacted to "agreed with Jillian ..." with 

From P. JoEllen Price, Financial Aid Administrators to Everyone:

Reacted to "Agreed with this sen..." with 

From A-Alyssa Dobson, 4Yr. Public Institutions to Everyone:

Reacted to "agreed with Jillian ..." with 

From P, Jillian Klein, Proprietary Instit to Everyone:

I would recommend: "An institution is required to take attendance in a course if--"

From P - Erika Linden, Private Nonprofit Institutions to Everyone:

Reacted to "I would recommend: "... " with 

From A, Scott Dolan, Private Nonprofit IHEs to Everyone:

plus 1 to that sentiment as well

From P - Erika Linden, Private Nonprofit Institutions to Everyone:

Scott Dolan entering for Private Nonprofit Institutions.

From P. Jo Blondin, Community Colleges to Everyone:

Jason--Same with community colleges.


From P. JoEllen Price, Financial Aid Administrators to Everyone:

I agree. It should be written in a way that is clear and doesn't leave room for misinterpretation.


From A, Scott Dolan, Private Nonprofit IHEs to Everyone:

Erika will step back to the table for private nonprofits.

From (A) Zack Goodwin (he/him), Financial Aid Administrators to Everyone:

Reacted to "I agree. It should b..." with 

From P - Erika Linden, Private Nonprofit Institutions to Everyone:

Reacted to "I agree. It should b..." with 

From A, Scott Dolan, Private Nonprofit IHEs to Everyone:

i think it is important to note that late stage dissertation work tends to operate simiarly this way regardless of modality.

From Jamienne Studley to Everyone:

sorry, Jillian: I only have a law degree, no dissertation, not a Dr.

From A, Scott Dolan, Private Nonprofit IHEs to Everyone:

plus 1 for being careful about outcomes-based (direct-assessment) programs

From P, Jillian Klein, Proprietary Instit to Everyone:
Replying to "sorry, Jillian: I on..."

You're still a star! :)

From P, Jillian Klein, Proprietary Instit to Everyone:
Reacted to "i think it is import..." with 👍

From A, Scott Dolan, Private Nonprofit IHEs to Everyone:
Replying to "sorry, Jillian: I on..."

I will say, the whole design of late stage dissertation work is to support the learner moving in a more self-directed fashion. This was certainly true of my experience at an R1 flagship state university

(A) Zack Goodwin (he/him), Financial Aid Administrators to Everyone:
Reacted to "I will say, the whol..." with 👍

From P - Laura Rasar King, Specialized Accreditation to Everyone:
Reacted to "I will say, the whol..." with 👍

From P, Jillian Klein, Proprietary Instit to Everyone:
Reacted to "I will say, the whol..." with 👍

From P, DC, HBCUs, MSIs, TCUs to Everyone:
Hello, P, DC will be returning

From A - D'Angelo Sands HBCUs, HSIs, TCUs to Everyone:
DC P for HBCUs, HSIs. TCUs will be joining.

From (A) Dom Chase - Business Officers to Everyone:
Could that have happened concurrently?

From Jamiene Studley to Everyone:
let us be clear that what we discussed will be brought to the discussion of particular provisions

From P. Jo Blondin, Community Colleges to Everyone:
Reacted to "Could that have ha..." with 👍