

DEPARTMENT OF EDUCATION
OFFICE OF POSTSECONDARY EDUCATION
NEGOTIATED RULEMAKING
REIMAGINING AND IMPROVING STUDENT EDUCATION (RISE)
SESSION 2, DAY 3, AFTERNOON
November 5, 2025

On the 5th day of November, 2025, the following meeting was held in-person, from 1:00 p.m. to 4:00 p.m.

P R O C E E D I N G S

MS. WEISMAN: Good afternoon, everyone. Welcome to our afternoon session of the 2025 Reimagining and Improving Student Education, or RISE Committee, of Negotiated Rulemaking. We have no cards up, so I'm going to turn it back to the Department to give a report out from the earlier caucus.

MS. ABERNATHY: Thank you, Annmarie. Tamar and Ashley, we have reviewed your proposal, and we are looking at making some adjustments to the reg text that we will share with you once we finish the adjustments to the reg text. So we just wanted to say thank you for pointing that out to us. It's not the right provision, we'll talk about that in a minute, but we do plan to make some changes to share with the committee as soon as we are ready to share that. So thank you. The whole purpose of our discussion was about making sure that we address the Parent Loans and the Graduate PLUS, right? The Graduate PLUS Loans are eligible for the transition period, the grandfathering. We did have that provision in 685.200. What we're looking to do is conform that into the loan limit section, because Graduate PLUS didn't really necessarily have an annual loan limit like others do, but the cap is the cost of education. We thought it would be better for us to have it in both

sections, so that it would be in one place if somebody was looking for information on whether Grad PLUS were still eligible for that grandfathering. So, we are going to put it in 685.203.

MR. LALLO: Yeah, for clarity, 200 is eligibility. 203 is loan limits. So we took your point. We think it does make sense to explain the limit separately from the eligibility. So we're going to put something in there to that effect.

MS. ABERNATHY: Can I go on to other things now? Okay. All right. So we had a proposal at lunchtime from Alex Ricci in adding some language around the major and we have come up with a way that we think moving forward it will be better that too, we're waiting on that regulatory amendatory text to discuss with you. And so at this point we hear you and we're trying to mitigate that with some of the language changes that we'll be presenting to you guys once it's ready. Do we have any questions or comments at this point? Okay. So I'm going to turn it over to Jeff for a minute.

MR. ANDRADE: Sure.

MS. ABERNATHY: I'm like a bad waitress. Sorry, Jeff. Turn it over to Jeff, and we'll go from there. Thanks, everybody.

MR. ANDRADE: Okay, thanks. And once

again appreciate the good conversation that we had yesterday afternoon with regard to professional student. We took a lot of that input back and have some thoughts. And we would like, at this time, to have a caucus with the institutional representatives and Alex Holt. So that'd be Jenna, Andy, Timothy, their alternates, and Alex and an alternate.

MS. ABERNATHY: And right before we do that Ashley, when you requested that we remove from 685.203(m), the language that we added this morning about except for a subscription-based program as defined in 668.2 or a non-term program, we are keeping the non-term program, but we are removing the subscription-based program. So we have taken some of that provision and removed that language from 685.203(m). Now we're ready.

MS. WEISMAN: If I can just confirm the members of the caucus. So it's the Department, along with the three institutional representatives. So that's Jenna, Timothy, and Andy, as well as their alternates.

MR. ANDRADE: Plus Alex Holt and Andrew.

MS. WEISMAN: Plus Alex Holt and Andrew.

MR. ANDRADE: Right.

MS. WEISMAN: And about how long do

you think you'll need?

MR. ANDRADE: No, we didn't
(inaudible) at this point. Give us 25 minutes,

MS. WEISMAN: 25 minutes?

MR. ANDRADE: Which we know we'll go
to 30, but.

MS. WEISMAN: So we'll resume at
approximately 1:25.

MR. ANDRADE: Okay. Thank you.

MS. WEISMAN: (inaudible) five.

Welcome back. At this point, I'd like to turn it over to
Tamy Abernathy from the Department.

MS. ABERNATHY: Thank you, everybody.
We had a very wonderful conversation. I am going to yield
my seat at the moment to our Undersecretary,
Undersecretary Kent. He will give out the report on the
caucus, and we will be passing out some materials for the
individuals that were not in the room with us during the
caucus. Undersecretary Kent?

UNDERSECRETARY KENT: Good afternoon,
everybody. I held out as long as I could from sitting
here, but you guys just looked like you were having way
too much fun without me. It is not lost on me or the
administration that this is one of the most interesting
parts of this rulemaking. Some may say contentious. But

I'm very excited to sit here and review with you a proposal that we put a lot of thought into, and we put a lot of thought into it because, A, we know it is important for students and families. We realize it is important, and the stakes are high for institutions of higher education. And it is something that we've spent a great deal of time thinking about. Just ask my staff how many hours they've spent in my office the last few weeks. We are going to put up on the screen and don't worry about reading it. We're going to go through it together. And then I'll yield the floor back to Tamy and Jeff in terms of the discussion. So what you have in front of you and on the screen on page one is where we started at the beginning of this week. And we spent a great deal of time looking through the proposals that you all submitted over the last few weeks, as well as the general public, and spent even more time going over what I'll call affectionately Alex's proposal. Although I know you all were involved in the development of that. And so what we did yesterday was try to unpack elements that made sense to us in the administration, and that was a logical outgrowth of where we may be going, so that we can defend this definition in the notice of proposed rulemaking and moving forward. So what you have here on the first page is where we started the week, so nothing new here. No

surprises. If you turn to page two, which is the blue text in front of you. I'm going to walk through with you the language, and then I'm going to walk through the rationale for each of the elements. I'm going to walk through the language so that you can take it in, and then I'm going to walk through the rationale for each of the elements. Okay? If we could just zoom out just a little bit, that would be helpful, I think, maybe, for the general public. So, a professional student is defined as a student enrolled in a program of study that awards a professional degree upon completion of the program. One, a professional degree is a degree that romanette one, signifies both completion of the academic requirements for beginning practice in a given profession, and a level of professional skill beyond that normally required for a bachelor's degree. Romanette two is generally at the doctoral level, and that requires at least six years of academic years of postsecondary education coursework for completion, including at least two years of post-baccalaureate level coursework. Romanette three generally requires professional licensure to begin practice, and romanette four includes a four-digit CIP code as assigned by the institution or determined by the Secretary and the same intermediate group as the fields listed in paragraph two, romanette one of this definition. Two. A

professional degree may be awarded in the following fields. One, pharmacy, dentistry, veterinary medicine, chiropractic, law, medicine, optometry, Osteopathic medicine, podiatry, theology, and clinical psychology. Three. A professional student under this definition may not receive Title IV aid as an undergraduate student for the same period of enrollment and must be enrolled in a program leading to a professional degree under paragraph two of this definition. So going back to page two at the top, I'm going to walk through generally the Department's rationale for each of these elements. A professional degree is a degree that in romanette one, signifies both the completion of the academic requirements, etc. This subparagraph is derived from 668.2(b), which is a professional degree. So this language is lifted verbatim from the language already existing in 668.2(b), so this should be the least controversial part of the definition. Two is generally at the doctoral level, and that requires at least six academic years of postsecondary education coursework, including at least two years of post-baccalaureate level. So of the ten programs listed under 668.2(b) as professional degree, nine first professional degrees are at the doctoral level. Theology is the only exception. And the Department's position is that we cannot remove the theology program because it is already

contained in the definition of 668.2(b) when the One Big Beautiful Bill act was passed. The Department would clarify in the preamble to the final rule that only doctoral programs are included in this definition, and that the term generally is used solely to account for the theology program, which must remain. The ten programs listed in current 668.2(b) have traditionally been referenced as first professional degrees. And even today NCEES classifies the nine programs as doctor's degree professional practice. In terms of the latter element, including at least two years of post-baccalaureate level coursework. Again, we lifted this concept from the NCEES definition of doctor's degree professional practice. Generally requires professional licensure to begin practice. Again, the concept here of generally requires professional licensure is lifted directly from 668.2(b). In four, it includes a four-digit CIP code as assigned by the institution or determined by the Secretary in the same intermediate group. So we took back your proposal over the course of the last several weeks, and agree that there is some desire to include additional programs here. We looked at what made sense in terms of using six-digit CIP codes, four-digit CIP codes, and two-digit CIP codes. And the administration's position is that including two-digit CIP codes would be too broad. It would sweep in too

many programs to the tune of almost over 70% of all doctoral programs would be included sweeping in the two-digit CIP code. So we believe that using the four-digit CIP code, which is between 2 and 6, makes sense. There was more rationale in terms of how we developed that, but by bringing in the four-digit CIP code, you're getting at 45 new programs that would be eligible. Again, not all of those would necessarily be at the doctoral level, but you would be sweeping in additional programs. Two. A professional degree may be awarded in the following fields. You've all seen the list of ten before, so I'm not going to bore you with that. Obviously, those have to remain because they are in existing 668.2(b). However, we did use clinical psychology. And the rationale the Department has for including clinical psychology here, which would obviously include clinical psychology and all the mental health programs under that four-digit CIP, is that in the previous administration's Gainful Employment rule, they included clinical psychology in parallel with programs like medical doctors and dental programs, in order to give those programs similar amortization periods. So we believe there is a rational basis for including clinical psychology, because there is precedent and the Department's current regulations for treating clinical psychology, similar to medical doctor programs

and dental programs. So one of the things I hope that you all take away here is that what we are trying to do, again, is make a good faith effort to reach consensus on a very hard issue. It is the administration's position that we are concerned with (inaudible) graduate debt, especially for programs that are not providing a good return on investment for students and their families. We believe that this is a rational compromise of where we started on Monday with ten programs, and provides a rational basis for each of the elements that we have included in the definition. I don't want to speak for the institutions in the room, but we have gone through this with them, given the impact that it will have on them, and I will let them speak for themselves. But I think that we are in a good place with the institutions on understanding that this may not meet the needs of every institution and every program, but it's certainly going to get us a little bit closer to where we are today versus where we are on Monday. So I think with that, I'm going to turn it back over to Tamy and Jeff and Jacob, and we'll let the conversation get started. Thank you.

MR. ANDRADE: You can start the comment cards.

MS. ABERNATHY: Thank you, Undersecretary Kent. Do we have any questions or

comments?

MS. WEISMAN: Alex Holt.

MR. HOLT: So I want to thank the Department for obviously doing a ton of work and going back to the drawing board to reconsider this. I think this is a very thoughtful proposal from the taxpayer and public interest constituency. Our biggest concern was about the durability of the rule. We believe that the Department's legal justifications are very solid, and thus this, we believe, is a very durable rule, and so we're fully supportive of it.

MS. WEISMAN: Timothy?

MR. KING: I just want to reiterate that I appreciate the Undersecretary and his staff for addressing this. It is a difficult issue for my constituency group, and we're going to go back and talk about it and come back with some answers then. But I really do appreciate it. And I know it's difficult. So we'll go from there.

MS. ABERNATHY: Hearing or seeing no other additional questions, I just want to go over just a couple things before we do a pulse check on 685.102. In 685.102, there was an additional definition of graduate student that we introduced. This is where previously we had grad professional student, and we had to separate it

out. So graduate student is a student enrolled in a program of study that is above the baccalaureate level and awards a graduate credential. In parentheses, other than a professional degree, end parentheses, upon completion of the program. And then we have a definition of program length in addition to what we just heard the Undersecretary describe for 685.102, the definition of professional student. Program length is the minimum amount of time in weeks, months, or years that is specified in the catalog, marketing materials, or other official publications of an institution for a full-time student to complete the requirements for a specific program of study. At this time, Linnea, if you could find 685.102, not necessarily with the definition of professional student, because I know we haven't had a chance to put that in there, but just the other two provisions of graduate student and program length, so that we could do a pulse check, please.

MS. WEISMAN: Jenna?

MS. COLVIN: Could I ask that we wait on the pulse check until we have time to talk with our constituents about this?

MS. ABERNATHY: Can we do a preliminary pulse check? The reason I ask is today is Wednesday, I know you need to check with your

constituents, but I'd like to see if we're thumbs down or thumbs up from, from everyone, if that's possible.

MS. WEISMAN: Jenna?

MS. COLVIN: Could I ask for a caucus with the colleges then?

MS. ABERNATHY: You certainly may.

MS. COLVIN: And the state officials.

MS. WEISMAN: Jenna, would you like the Department at your caucus?

MS. COLVIN: Not right now.

MS. WEISMAN: Okay, so you're looking for the institutional representatives and the state primary and alternate. And about how long do you need?

MS. COLVIN: 15 minutes.

MS. WEISMAN: Okay. Welcome back, everyone. The group is back from their caucus. Just to reiterate, in the caucus called by the private nonprofit institutions. We had private nonprofit institutions, public institutions, proprietary institutions, and states. Primary and alternate for each, with the exception of public where the alternate is not able to be here this week. Jenna, would you like to give a report out on the status of your caucus?

MS. COLVIN: Thank you. We just used the time to discuss the operational impacts of the

proposal from the Department.

MS. WEISMAN: Would you like to continue, Jenna?

MS. COLVIN: Well, So my question is, can you tell us how many programs under the proposal meet the full set of requirements in the proposal?

MS. ABERNATHY: We can. We are going to defer that question to our economic expert. And if he wants to either come up here or go up to the podium. Cody? So just for the record, OPE has a Batman, too. Just kidding. Or OUS, excuse me. I can't take credit for it there. Mr. Batman, would you yield your microphone to Mr. Cody? He says no. Eric says no.

MS. WEISMAN: If you could introduce yourself. Your name and your title, please.

MR. CHRISTENSEN: Yes. My name is Cody Christensen. I'm a senior advisor in the Office of the Chief Economist. The question is about reading the list of the universe of eligible programs that could be included in our definition.

MS. ABERNATHY: Jenna, please clarify your question.

MS. COLVIN: My question was not to read the 44. My question was, which of the 44 meet all of the criteria in the proposed rule?

MR. CHRISTENSEN: Yes. Our data at the Department we do not have information on which of these programs specifically lead to licensure. So, sometimes we cannot determine if these programs generally lead to licensure. So we won't be able to determine if they meet that criteria. What we can determine is that these programs are in the correct four-digit CIP codes that correspond to the programs that are listed in the regulation, and so they could theoretically be eligible if a licensure test, if those programs did have a licensure test.

MR. ANDRADE: And Jenna, to sort of help Cody out on that. So there is some variability among states on some of these licensure requirements as well. So again, I think it is generally program specific, so we might not have that -- have all that data.

MR. LALLO: Also, just to tag in on that too, I think sometimes they could be coded with slightly different names, but they could lead ultimately to the same degree, that's why there's the parentheses with the degrees listed in there as well.

MS. COLVIN: Okay. So I'm trying to check my understanding because I think under the new proposed rule from the Department, it has to generally meet licensure. But we're saying yes on licensure in the

preamble language, and be for beginning practice, and be at the doctoral level. And so of those 44, I think it's 11. Am I correct in that?

MS. ABERNATHY: So, I would like to clarify one thing. I believe that the word generally in both romanette two and romanette three are because of the theology degree that is in 668.2 that we have to keep in there. That is the whole purpose of the word generally.

MR. ANDRADE: But I think to your point, you're talking about doctoral programs. Generally, these are Cody, correct me if I'm wrong, it's doctoral programs professional practice. And then we're looking at the CIP codes below them. So this is at the intermediate level. What programs are adjacent to the enumerated programs that are listed in the last paragraph. And so Cody's saying these are the doctoral classifications for those. So, the names of individual programs are going to be as I spoke yesterday are going to be a little bit different because, the CIP codes are designed as a place to report your completion data in IPEDS. And it's also again used to look at completions in other contexts. So the names are going to be somewhat different by institution. So I think this is going to be an institution by institution analysis. The programs that Cody has identified or the CIP codes that Cody has

identified, my recommendation would be for an institution to look at that. How many of them are at the doctoral level and in the fields that you're preparing students for, are there licensing requirements associated with the occupations that you're educating people for?

MS. WEISMAN: Jenna, do you have a further question or comment?

MS. COLVIN: Yes. So from my chicken scratch notes, I'm not going to make Cody read all 44 for everyone. I tried to capture what they were. My sense was, it was the original list of ten with some variation in pharmacy and clinical psychology.

MR. ANDRADE: Yes. So there are several adjacent programs around in the new vertical that's created by adding clinical psychology. It brings in a number of counseling degrees, many of which are licensed and are part of the GE qualified graduate exception, giving them longer period of time for amortization. So many of them are going to be adjacent to that. Plus as Cody had mentioned, a number of them are adjacent with regard to pharmaceutical, but not all of them are necessarily going to require licensure.

MS. COLVIN: And finally, just because I know some folks from the professional association are tracking on this and watching, and they're not here to be

in the room. It does not include some of the programs in CIP code 51 that would have been included in the tax payer plan like MPH, PA, DPT, DNP, or audiology?

MR. CHRISTENSEN: That is correct. They are not included in the proposal that the Department has put forward.

MR. ANDRADE: And they're not included because they're not, they're not adjacent at the intermediate level.

MS. WEISMAN: Next, we have Timothy, followed by Bob, and then Deborah.

MR. KING: You may have already done this, I'm just wondering if we're going to get a list of those programs in this SIP code so we can look, look through them. If that's right.

MR. ANDRADE: We're working on that. We were one step ahead of you, Mr. Tim.

MR. KING: Thank you.

MS. WEISMAN: Bob?

MR. CAREY: On the revised version of (b) (1) romanette two. From my high school English teacher, she would say that at the doctoral level, the generally does not apply after that first comma, that becomes and that requires at least six academic years of postsecondary education. Is there something else in the

regulations elsewhere that says if someone comes in with enough high school or AP credits, or in the case of veterans with credit for the schools they went through in the military, that they can graduate, -- or two or three years that they're basically given the extra two years from, from the however they got the credits?

MR. LALLO: I think I can answer that. I came into college with postsecondary credit. It only counts somewhere if it counts towards your degree, right? An AP class only counts if it's counted towards a degree. So I don't think you could just say I have two years' worth of AP credit.

MR. CAREY: No, I'm not saying that. I'm not --

MR. LALLO: No.

MR. CAREY: If a school has given me credit for APs or the school has given me credit for my prior military service education, how is that calculated in the --

MR. LALLO: It would be credit at the postsecondary level, right? So it still counts towards a degree, so then it would be brought in. But you couldn't just generally say I have two years' worth of AP credit, if those things are not counting towards, say, a bachelor's degree. Yeah.

MR. CAREY: Okay. So if the school gives you the equivalent credit of a year of education, you don't actually have to have gone through that, at that college to meet the six-year requirement?

MR. LALLO: Well, no, you still have to, but if your degree is at the degree -- like if it's included with your degree, the credit counts towards that, it's still at that college technically, right? Because the credit is counting towards it. I understand that you're splicing this, but this is a degree-by-degree analysis, not a student-by-student analysis. So I think that we're getting a little bit more granular than we probably need to with this part.

MR. CAREY: Yeah, okay, I see what you're saying. Okay.

MR. ANDRADE: That's where I was going. It's describing the degree, it's not a student.

MR. CAREY: Yeah. No, I got that now. Okay. How about for a 4+1 degree? I mean, law schools are starting to talk about that.

MR. ANDRADE: What's a credential that you're talking about, Bob?

MR. CAREY: Well, so again, going back to six years of academics, if someone's on a 4+1, that leads to a professional degree, and maybe the only thing

that I can think of that might possibly be that would be a JD.

MR. LALLO: There's no 4+1 law school. There are three and three law degrees. So you still have six years, but there are no 4+1 law schools.

MR. CAREY: So then, and I'm on yellow, so I know in the United Kingdom, they have direct entry into law school and med school. Would those no longer be eligible for these loans?

MR. ANDRADE: Well, you're right, and the concept of first professional degree is very similar to what you have. And so if you look at pharmacy, at chiropractic, and a lot of those situations, the student doesn't get a bachelor's degree and then go into those programs. But what this requires in the professional degree is that at least two years of those first professional degrees have to be at the post-baccalaureate program, because as you point out, some of these programs historically have had a program where you do not need to have a bachelor's degree to enter the program. And so that's what this is driving at. And again, it's I think as the Undersecretary pointed out, this is a historical, long standing definition of first professional degree that the Department through office of postsecondary education and National Center for Education statistics

has used and again these first professional degrees they were more in the past it's less common now that you can have a student entering these programs without having a bachelor's degree.

MR. LALLO: I think also we have limits for bachelor's degrees separately, right? So if it's at the bachelor's level, it would fall under that. We're not mixing and matching at that level.

MR. CAREY: No, my concern is for schools that have combined programs and where they give the bachelor and master's simultaneously. Last question then, under revised (b) (2) romanette one, is there any occupational, physical, or speech therapy degree that would qualify with the four SIP program, with the four-digit SIP? I ask this because this is the biggest issue for the VA is getting therapists.

MR. ANDRADE: I don't, yeah again, I think as the Undersecretary pointed out, we did not look at need demand as a factor. We looked at what are the common requirements in terms of a professional degree. And so, I don't believe in the adjacent, let me get this right, the adjacent SIP codes at the intermediate level that those degrees are adjacent to any of the main degrees that we included here on the list. So that they may be in code 51. I'm not even sure if all of them are

code 51, but they're not close enough under the four-digit SIP code.

MR. CAREY: Thank you.

MS. WEISMAN: Deborah?

MS. LILLY: Thank you, Annmarie. Since Jake brought up credentialing under (b)(2) romanette one with the addition of clinical psychology, the parenthetical that includes credentials only includes PsyDs and omits PhDs. Is there a justification for that, or why would that not be included?

MR. LALLO: We talked about that a little bit in the caucus. As I understand, we're going to take that back and look at it a little bit more carefully. I believe Andy said he was going to provide us some data on that, and how states approach that, and the number of programs that involve PhDs and PsyDs. So we will take it back and consider it.

MS. LILLY: Perfect. Thank you.

MS. WEISMAN: Scott?

MR. KEMP: Thank you. Yeah, and until we can look at the four-digit list and SIP code list and really kind of get into the weeds to see how much this really adds to it. Just add a question about was under (b)(1) one romanette four, and in the process or what is your thought process on the degree to which -- I think

some of us are concerned that if this is the static list come July 1, how quickly can the Department move in the future to add in different ones? Because in looking back at week one, the original proposal was or degrees determined by the Secretary through rulemaking. This one just says determined by the Secretary. So if between now and then, there's a groundswell of support for a particular degree of path that's not included, is this a decision that the Secretary can make on their own, or is this a rulemaking thing? Because again, until we know how many additional degrees this adds to the original proposal, we're not going to know who's left out. And how quickly is the Department ready to take action to add in ones that were left off because they weren't one of the four-digit SIP code programs?

MR. ANDRADE: Yeah. So if you remember at the beginning of my presentation yesterday, I started with the statute, and the statute said the definition of professional degree and referred to the one in the general provisions as of the date of enactment. So that is not a dynamic definition. It's fixed in time. So it was the programs that were viewed as professional degrees at that time. And so what we've tried to do is through this process, come up with a justification that clarifies what those degrees are. As you have noted, I think, on a

number of occasions the, the list is broader. There's because of the language is broader than the ten that were identified in the regulation. And so what we have attempted to do here is to make the list broader than what's identified in identification, but keep true to the statutory requirement that it's as of the date of enactment.

MS. WEISMAN: Tamy, did you want to add something?

MS. ABERNATHY: I certainly do. We're going to put the list up on the screen. We're going to share the list with you so that you can see.

MS. WEISMAN: I know some people are still reading, but we've got three cards up, so I'm going to go first to Deborah. Nope. We'll go then to Jenna, and then Bob.

MS. COLVIN: When was the last time the CIP code list was updated by NCEES?

MR. ANDRADE: 2020 is the taxonomy that we're using. 2020. It's updated every ten years.

MS. COLVIN: Okay, thanks.

MR. LALLO: On the zero year.

MR. ANDRADE: On the zero year, yes.

MS. WEISMAN: Bob.

MR. CAREY: So I'm probably not

reading this correctly. I see CIP two and I see CIP six and we're talking CIP four. So how should I be reading this?

MR. ANDRADE: Right. So on the left-hand side is the two-digit CIP, which is what you drill down from on the degrees that are delineated in the regulation. And then on the right, you have -- if you screen it on the four-digit CIP code, you have the six-digit CIP codes, which would be adjacent to those degrees, under the, under the taxonomy.

MR. CHRISTENSEN: And Jeff, just to clarify, the four-digit CIP codes were using, these are all of the six-digit CIP codes that fall under the following umbrella for these four-digit CIPs. It's 51.20, 51.04, 1.80, 51.01, 22.01, 51.12, 51.17, 39.06, and 42.28.

MS. ABERNATHY: Cody, would you repeat those?

MR. CHRISTENSEN: Absolutely. These are the four-digit CIPs. Absolutely. 51.20, 51.04, 1.80, 51.01, 22.01, 51.12, 51.17, 39.06, and 42.28. Those are the four-digit CIP codes that align with the programs that are listed in the regulation, as well as clinical psychology.

MS. ABERNATHY: I'm going to ask that

Linnea goes to the second page, please. Thank you.

MS. WEISMAN: Bob, your card is still up. Did you have a new question? Your microphone is still open.

MR. CAREY: You sound like all the guys in my squadron that said get off your hot mic.

MS. ABERNATHY: I believe Cody wants us to mention that for veterinary medicine, it is truly five digits. There's a hidden zero. So the leading zero is not shown on veterinary medicine, but that one is

MR. ANDRADE: Zero one.

MS. ABERNATHY: If we don't have any more questions, I would like to go to a pulse check, please.

MS. WEISMAN: And what would you like to pulse check?

MS. ABERNATHY: 685.102. That would be the definition of professional student, the definition of program length, and the definition of graduate student. The text that I read out earlier.

MS. WEISMAN: Okay, so pulse check on 685.102, if I can see thumbs, please. Okay, I see thumbs up from Andy, Ashley, Scott, Alex Ricci, and Alex Holt. Oh, Scott, I'm sorry, you're to the side. I see Jenna, Deborah, Bob, Scott to the side, and I see Timothy with a

thumbs down. And Jenna is a thumbs down. Okay, let's go over that again. So thumbs up, I have Andy, Ashley, Alex Ricci, and Alex Holt. Thumb to the middle, I see Deborah, Bob, and Scott. And thumbs down, we have Jenna and Timothy, so I'd like to start with those who have their thumbs down if you could explain your rationale for the thumbs down.

MR. KING: Sure.

MS. WEISMAN: Timothy first.

MR. KING: (inaudible) Is that all right? Go ahead? No. Repeat. I appreciate the effort and time it took to come up with the options. I need to talk to my constituents to get a better understanding of the impact. I know from where I come from and regional universities, it does nothing for regional universities and doctoral programs. So, I just need to have that conversation. I'm not closed. I think I can get there. I just need to make sure I understand a little bit better feedback from my constituency group. So I'm not going to tell you that I'm going to vote no right now.

MS. WEISMAN: Jenna, do you have anything to add?

MS. COLVIN: Same.

MS. WEISMAN: And then for anyone who had a sideways thumb, do you want to comment on what

would make you feel more positive toward the proposal?

MS. LILLY: I'm just going to ditto or concur --

MS. WEISMAN: (inaudible) Deborah.

MS. LILLY: Sorry about that. I'm just going to ditto or concur with what Tim said. So I think we'll get there. I just need time to review with the constituency.

MR. KEMP: Yeah.

MS. WEISMAN: Scott?

MR. KEMP: Yeah. Similarly, and also just want to look at how many additional programs does this really bring in, bring into the mix.

MR. ANDRADE: So we did do the analysis. And so I think it makes about 44%.

MS. ABERNATHY: 44 at 47%.

MR. ANDRADE: Excuse me. Yeah, excuse me, 47% of the programs, currently class -- of the doctoral programs.

MS. ABERNATHY: So the two digits, right? He wanted the four-digit, right? 44 programs at 47%.

MR. CHRISTENSEN: Absolutely. Just to clarify -- my name is Cody Christensen. To clarify the question that was raised under this proposal, the four-

digit CIP, it includes 47% of doctoral professional students, 47% of the students, it is 4% of the unique number of programs. That's because there's a thousand plus programs. So the 44 represents 4% of 1,000.

MS. WEISMAN: Deborah, and then Jenna and Timothy.

MS. LILLY: So just to clarify those numbers, though, it's 47% of doctoral program students or 4% of the unique number of programs, but that doesn't mean they meet the rest of the definition surrounding licensure?

MR. ANDRADE: I misspoke, and Cody clarified, it's not of the programs. It's, it's 47% of the students enrolled in doctoral professional programs identified in -- currently identified in our database.

MS. LILLY: Okay, but even then, that doesn't mean those are the individuals who would be impacted by the rest of the definition. They're not necessarily in licensure programs because we know that, correct?

MR. ANDRADE: Correct. Because we don't have the data on all of the criteria in the definition. That's a school-by-school. But that gives you a universe of the programs themselves. And then you would still have to do the test on licensure depending on, on

state and, and I think that's probably the biggest screen would be the, would be the licensure requirement.

MR. LALLO: And the program length as well.

MS. LILLY: Correct. Thank you.

MS. WEISMAN: Timothy?

MR. KING: Yes. As soon as we get the list of these programs so I can double-check, that will help me a lot, because I looked at a couple of them when the list was up there, and you can get licensure with a master's degree in some of those. So I just want to make sure if I can go through those, I would appreciate that when -- whenever y'all have time.

MS. ABERNATHY: I believe that as long as we have this information already that we can send that out. Yeah, we'll send that out to you. I'm getting the all clear that they'll be sending it out to you as soon as we can.

MS. WEISMAN: Alex Holt?

MR. HOLT: Yep. Just a clarifying technical question. In terms of licensure, I understand the Department doesn't have the data. So I have a question then. Is it ultimately the school's determination which programs would qualify under the licensure requirement? And should the school be looking

at licensure specific to their state to make that determination? And what if the school has campuses in multiple states?

MR. ANDRADE: We'll take that one that one back, but appreciate that question.

MS. ABERNATHY: Can you send that to us in writing, though? Thank you. It doesn't have to be a proposal. Just --

MR. HOLT: No more proposals from me, Tamy. There's no more proposals.

MS. ABERNATHY: And I am so (inaudible). Annmarie, unless I missed something, I don't know that we got the reason why Bob had a sideways thumb.

MR. CAREY: Ditto to Tim and everyone else. I need to talk about this with constituents and --

MS. ABERNATHY: Thank you.

MR. CAREY: -- (inaudible) getting feedback.

MS. WEISMAN: We have no other cards, and it is 5 till 4:00.

MS. ABERNATHY: As we are unable to dive into any of the other proposals that we received that we haven't been able to address yet, or any of the reg texts that we have within the five minutes that we have, I would suggest that we go ahead and adjourn for

the day, because there's nothing that we can do that's going to take just five minutes.

MS. WEISMAN: With that, we will, we will finish for today and resume tomorrow morning at 9:00 a.m. Have a pleasant evening.