

From Informal Group Working on Prior Approval Proposal

We are sending some suggestions on prior approval out to all the negotiators to ask for your thoughts in a few specific areas. Although we provided these during negotiations, and got some feedback then, we are sending these out again so that we can gather any additional feedback that may have occurred to you since, or that there was no time to offer during the negotiations. We anticipate developing detailed language on prior approval provisions, but believe your input on the concepts, before we develop specific language would be very helpful. The purpose behind the list below is to have a few, clear, specific criteria that would be clearer, more specific, and more useful in weeding out the worst GE programs before students become indebted for them, than the current requirement to attest that there is a need for the GE program proposed.

Here are the questions we have for you about the concept/list below:

1. What, if any, technical issues do you see that might impact how or whether these criteria could work?
2. What, if any practical issues do you see in gathering the necessary information?
3. Do you have any suggestions for any other specific, clear criteria that would distinguish the worst GE programs, that you think should be added or substituted for any in the list?
4. If you are aware of any accrediting associations or states that require any of the criteria included in the list below for approval of GE or other programs, do they have any specific requirements for how the information is to be collected or documented?
5. If not all GE programs would have to be approved in advance, do you have any suggestions for how to determine which ones should be?
6. Some negotiators discussed rigorous approval processes they used. Given that poor-performing programs exist, do you have any suggestions about aspects of your approval process that others are not using that you believe would weed out those weak programs?

Here is the concept on which we want your feedback (the more specific the better):

All the data must demonstrate that the program will prepare students for gainful employment in a recognized occupation:

- projected ratio of debt to earnings shows earnings sufficient to repay debt
- projected earnings greater than 150% of poverty level
- has programmatic approval generally needed to sit for state licensure exam or private certification exams generally expected by employers
- training at that level is generally required to obtain employment in the SOC codes identified

Data supporting these items to be obtained in reliable and valid survey conducted in same manner DE proposed for salary surveys for earnings alternative data or other reliable and verifiable documentation to be discussed.

Thank you for your help.