

U.S. Department of Education Negotiated Rulemaking – Program Integrity and Improvement
Issue 2: State Authorization
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I respectfully propose revisions to section 600.9(d) of the Department of Education’s proposed state authorization regulations, as follows:

(d) Notwithstanding paragraphs (a), (b), (c), and (e) of this section, an institution is not considered to be legally authorized for purposes of institutional eligibility for funding under the HEA with respect to programs offered in a State if those programs do not meet the educational, and as applicable, programmatic or institutional accreditation requirements for graduates of those programs to receive certification or sit for the licensure or certification examinations required in the State in the occupation for which the program is intended, unless the institution - ~~obtains written acknowledgement from each student in that State before enrollment that graduation from the program~~

(i) Clearly and conspicuously discloses in a stand-alone disclosure to prospective students in that State:

- (A) **That the program** will not fulfill educational, or as applicable, programmatic or institutional accreditation requirements for licensure, or to obtain licensure or certification in that State **upon graduation**; and
- (B) If applicable, ~~that~~ **the** additional coursework, field experience, or other academic requirements **that** must be completed to fulfill requirements to obtain licensure or certification in that State; **and**

(ii) Obtains a written statement of understanding from each student in that State before enrollment that graduation from the program will not fulfill educational or, as applicable, programmatic or institutional accreditation requirements for licensure, or to obtain licensure or certification in that State upon graduation.