Submitted by Sandy Sarge

FOR CAVT (our specific situation):

* + veterinary technician programs are capital intensive programs.  The American Veterinary Medical Association provides programmatic accreditation for all federally accredited veterinary technician programs.  We have no choice but to spend approximately 500,000$ on equipment and inventory to provide a proper education for our students.  This is the basis for our tuition; I term this rational tuition.  Programs that provide annual tuition under 10,000 receive state funding supplements.
	+ Most veterinary technician students are women.  Many women choose to have children after school, or are already mothers and take on roles as home caretakers in addition to working outside the home.  Many of these students take on part time work.  This is out of the control of veterinary technician programs.
	+ Many veterinary clinics pay hourly and seek to limit the time that technicians work so as to avoid overtime charges.  This is out of the control of veterinary technician programs.
	+ the CAVT has met all compliance requirements for the last three years--no findings.  How is it that we should be at risk for defunding?  NOTE: our default rate is 6%!!!!  How does the D:E ratio additionally add to the efficacy of the program (from the student's perspective)?!?
	+ If the average repayment for our students is 300$/month, then the first year salary of a veterinary technician would have to be 45,000$/year to meet the 8% D:E requirement.  This is out of step with reality in the veterinary industry.  45K/year is a salary appropriate for a technician in practice somewhere between 4-7 years.   This is yet another instance of the rule laying waste to good programs.
	+ If the intention of the rules is to move associate degree programs to community colleges, it will fail in the case of veterinary technology.   The learning curve and capital requirements are too high.  The veterinary community requires accredited veterinary technician programs to provide trained veterinary nurses to the veterinary clinical community in order to serve the public health system--including family pets.  Should private programs go away, this mission, as defined by the AVMA, will have been thwarted.
* In general:
	+ GE is predatory rule making.  Predatory rule making cannot withstand rational scrutiny.  It is meant to target one sector of the industry.  Unfortunately, it casts a wide net that includes good schools, as well as so-called bad schools.  It has been stated that good schools will not be defunded, because their students will earn enough money to meet the D:E ratio.  This is not always true.  Many good schools will suffer.  This includes almost every private veterinary technician program, as well as other lower wage programs such as cosmetology or hair styling.   There is simply no accommodation made for programs such as these.  There should be.
	+ The idea of setting a D:E ratio is not rational.  As stated above, it does not accurately address every situation, and allows for MANY instances of an inappropriate result--good schools being defunded.
	+ Loan repayment rates are the more rational measure of a program's success.  It should be up to the student, NOT THE FEDERAL GOVERNMENT, to decide if the loan amount is appropriate for potential monthly earnings.  I suggest that the counseling requirements increase to make students aware of this issue.
	+ INSTEAD OF D:E RATIOS AND PENALTIES: require schools to disclose the average percentage of first year income used to repay loans.  LET THE STUDENT DECIDE.
	+ It is more rational to require schools to look after students over metrics that are reasonably within the control of schools, while students are in residence.  For example: default prevention.   And... potentially, deciding how much money to take out in loans.  As of now we do not have control over (under current GE rules): how much a student can take out; how much a student makes at her first job; and whether or not she takes a full time or part time job.   Nor does GE take into account household income.  If a second earner takes in at least as much as the student, shouldn't that be taken into account as far as the D:E ratio?

I sure hope that helps.

Cheers,

Steve