Submitted by Marc Jerome

When the GE Rule was negotiated, very little data existed about debt to earnings. Both institutional and programmatic earnings data made available since the publication of the Rule should give the Department, consumer advocates, and policymakers reason to question the appropriateness of the 8% and 12% D/E thresholds. The issue comes into play when a student compares a degree program at a GE institution and a non-GE institution.  
  
Research from Mark Schneider  
  
An analysis of programmatic D/E data from the University of Texas is available and instructive. It indicates that for certain fields of study, such as drama and the fine arts, over half of the programs would fail if the GE D/E metrics applied to them.\*  
  
Our analysis of data derived from the College Scorecard concludes that certain proprietary degree programs that do not pass the GE D/E metrics have significantly better (lower) D/E rates than rates for similar (or identical) non-GE programs when calculated using debt and earning values from the College Scorecard.  
  
Data Request:  
  
To help the Committee better understand whether the current 8% and 12% thresholds are appropriate, we are requesting the Department compile comparable programmatic D/E data for a representative sample of non-GE degree programs in any or all of the following degree programs: acupuncture, criminal justice, drama, early childhood education, fine arts, graphic art design, and music.  
  
\*Nexus Research & Policy Center: Letter to the Department of Education dated July 7, 2017.  
  
  
  
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