

**U.S. Department of Education
Program Integrity and Institutional Quality
Negotiated Rulemaking**

**Meeting Summary – Session 3
March 4-7, 2024**

Welcome

Federal Mediation and Conciliation Service Facilitator welcomed the Non-federal, Federal, and public to Session 3 of the Department of Education negotiated rulemaking for developing proposed regulations regarding Program Integrity and Institutional Quality.

Introductions

Roll Call of Record was conducted.

Membership

The following individuals are the Members of the Program Integrity and Institutional Quality Negotiated Rulemaking Committee:

Community of Interest	Primary Negotiator	Alternate Negotiator
Business Officers from Institutions of Higher Education	Joe Weglarz, Marist College	Dom Chase, Ivy Tech Community College of Indiana
Civil Rights Organizations and Consumer Advocates	Carolyn Fast, The Century Foundation	Magin Misael Sanchez, UnidosUS
Financial Aid Administrators	JoEllen Price, San Jacinto College	Zack Goodwin, University of Nevada, Las Vegas
Historically Black Colleges and Universities, Tribal Colleges and Universities and Minority-Serving Institutions (institutions of higher education eligible to receive Federal Assistance under title III, parts A and F, and title V of the HEA)	Dr. Charles B. W. Prince, Dillard University	D’Angelo Sands, Texas A&M Corpus Christi

Institutional Accrediting Agencies Recognized by the Secretary	Jamienne S. Studley, WASC College and University Commission	Michale McComis, Accrediting Commission of Career Schools, and Colleges
Legal Assistance Organization	Robyn Smith, Legal Aid Foundation of Los Angeles, and National Consumer Law Center	Sophie Laing, Pine Tree Legal Assistance
Private Nonprofit Institutions of Higher Education	Erika Linden, Des Moines University	Scott Dolan, Excelsior University
Programmatic accrediting agencies recognized by the Secretary, to include State Agencies recognized for approval of nurse education	Dr. Laura Raser King, Council on Education for Public Health	Amy Ackerson, Missouri State Board of Nursing
Proprietary Institutions of Higher Education	Jillian Klein, Strategic Education, Inc. (SEI)	David Cohen, Five Towns College – APC Board of Directors
Public Four-Year Institutions of Higher Education	Jason Lorgan, University of California, Davis	Alyssa Dobson, Slippery Rock University
Public Two-Year Institutions of Higher Education	Jo Alice Blondin, Clark State College	Michael Cioce, Rowan College at Burlington County
State Attorneys General	Diana Hooley, Massachusetts Attorneys General Office	Vacant
State Officials, including State higher education executive officers, State authorizing agencies, and State regulators of institutions of higher education.	John Ware, Ohio State Board of Career Colleges, and Schools	Robert Anderson, State Higher Education Executive Officers Association
Student or borrowers, including currently enrolled borrowers, or groups representing them	Jessica Morales, American University Washington School of Law	Emmett Blaney, Young Invincibles
U.S Military Service Members, Veterans, or groups representing them	Barmak Nassirian, Veterans Education Success	Ashlynn Haycock-Lohmann, Tragedy Assistance Program for Survivors
Federal Negotiator	Gregory Martin	David Musser Herman Bounds

Agenda

The committee reviewed and discussed the issues one at a time throughout the Session. The non-federal negotiators had submitted their counter proposals and rationales to the Department between Session 2 and 3 for consideration. The Department reviewed the proposals and then provided updated proposed regulatory text in advance of Session 3 on the following but did not reach consensus on the following topics:

- Withdraws and Return of Title IV Funds (R2T4)
- Distance Education
- State Authorization
- Cash Management
- Accreditation

The TRIO subcommittee presented a unanimous recommendation for the full committee to accept and reach consensus on the Departments regulatory text proposal for changes to three (3) TRIO programs as follows:

- Talent Search program
- Upward Bound program
- Educational Opportunity Centers program

The full committee reached consensus on the Departments proposed regulatory text related to TRIO.

Public Comment

The Committee provided opportunity for public comment at the end of each day except for the final day.

Next Steps

FMCS will distribute this final summary document. This concluded the negotiations piece the of the rulemaking on Program Integrity and Institution. The Department will proceed with the next phase of the rulemaking process.