

Congress of the United States
Washington, DC 20515

March 22, 2010

The Honorable Arne Duncan
Secretary
U.S. Department of Education
400 Maryland Ave, SW
Washington, DC 20202

Dear Secretary Duncan:

We are writing to raise serious concerns with the U.S. Department of Education's suggested approach for defining "gainful employment" in a recognized occupation in the recently concluded negotiated rulemaking on the integrity of federal financial aid programs.

In its current form, the Department's suggested approach singles out students attending proprietary institutions of higher education and non-degree programs at non-profit institutions of higher education, including community colleges, despite the fact that workers with degrees from career, technical, and vocational colleges have highly marketable skills that are critical as our nation struggles to cope with the current economic crisis and the looming shortage of workers in key fields.

Today, 2.8 million students attend career colleges. Seventy-six percent of these students live independently, without parental support. Sixty-three percent are 24 years old or older. Fifty-four percent delayed postsecondary education after high school. Forty-seven percent have dependent children, and almost one-third of these students are single parents. The Department's suggested approach will disproportionately harm these nontraditional and lower-income students who have no choice but to rely on student loans to pursue a postsecondary education and need the flexibility career colleges provide.

Higher education needs more competition and more capacity to expand access, improve quality, and prepare the 21st century workforce, not less. The Department's suggested approach detracts from the ability of deserving Americans to compete in the global economy.

Additionally, the Department's approach will lead to educational capacity cutbacks in critically important fields such as nursing and education. Nine percent of nurses and fifty-four percent of allied health workers who graduated last year were educated at schools that will be impacted by the Department's proposal. It makes no sense to cut nursing program educational capacity at a time when the country faces a dramatic nursing shortage and tens of thousands of applicants are turned away every year from nursing programs.

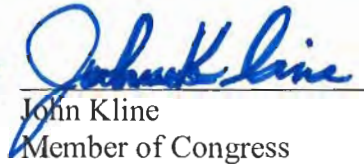
Taking all of this into account, we urge you not to move forward with your suggested approach on gainful employment. As you consider our request, we would greatly appreciate an analysis about why your goals for this proposal cannot be met simply through expanding student disclosures, which would arm students with the tools necessary to make an informed decision about the best institution for their needs. Further, please provide information on how your suggested approach will address the concern of high debt burden incurred by students without limiting access to educational opportunities for students in need of the skills provided by the affected programs. Finally, we urge you to consider if there are other means to address over-borrowing that would not create additional barriers to services for at-risk students.

Thank you for your attention to this matter. We look forward to continuing our work with the Department of Education on responsible measures that preserve access to postsecondary education and expand career choices for all Americans.

Sincerely,



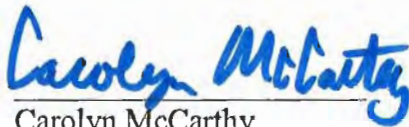
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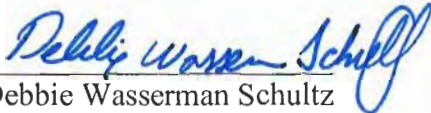
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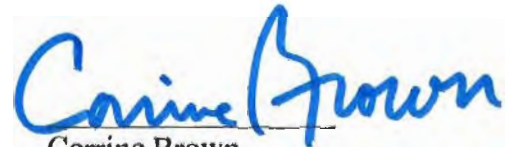
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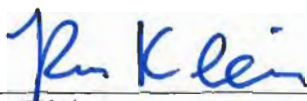
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