



To: United States Department of Education (Scott.Filter@ed.gov, Jessica.Freeman@ed.gov)

From: Jessica Ranucci, New York Legal Assistance Group, Negotiator on Behalf of Legal Assistance Organizations

Date: January 31, 2019

Re: Requests for Briefing and Data in Distance Education and Educational Innovation Subcommittee

I am submitting the following request for briefing and data requests in order to better understand the Department's proposed regulations.

A. Briefing Request

I am requesting that, at the Subcommittee's next meeting, the Department provide a staff member who can report on lessons learned from the EQUIP program and who will be able to answer questions from the Subcommittee related to the EQUIP program.

B. Data Requests

I am requesting that the Department provide answers to the following eleven data requests for most recent available academic year:

1. Total student enrollment in all Title IV programs.
2. Of this number, total student enrollment by type of institution (less than 2-year proprietary school; 2-year proprietary school; 2-year public school; 2-year private non-profit school; 4-year proprietary school; 4-year public school; and 4-year private non-profit school).
3. Of total student enrollment in all Title IV programs:
 - Number of students with no distance education component to their programs;
 - Number of students with some distance education component to their programs; and
 - Number of students in exclusive distance education programs.
4. Of the total number of students who enrolled in exclusive distance education programs, break down by:
 - In-state enrollment (students enrolled in a school with a physical presence in their own state);

- Out-of-state enrollment (number of students enrolled in a school lacking a physical presence in their own state); and
 - Foreign enrollment (students enrolled in a school without any physical presence in the U.S.).
5. Of the total number of students who enrolled in out-of-state exclusive distance education programs, break down by:
 - Type of institution (less than 2-year proprietary school; 2-year proprietary school; 2-year public school; 2-year private non-profit school; 4-year proprietary school; 4-year public school; and 4-year private non-profit school); and
 - Largest 3 institutions in enrollment numbers in each category with numbers of enrollees.
 6. For the top three institutions that offer exclusive distance education programs outside of the state where their physical headquarters is located and that can trace ownership to an entity that owns one or more institutions that offer the same programs in a format that is not exclusively distance education:
 - A list of the current programs being offered in both formats;
 - For each program, the cohort default rate for the exclusive distance education program and for the other programs, to the extent it exists;
 - The total tuition for the exclusive distance education program and for the other programs;
 - Completion rates, calculated under state law (if available) and under accreditation standards, if available, and calculated using Education Department data and/or as reported to the Education Department pursuant to 34 CFR 668.8(e)(1)(i);
 - Placement rates, calculated under state law (if available) and under accreditation standards, if available, including as reported to the Education Department pursuant to 34 CFR 668.8(e)(1)(ii);
 - Gainful employment metrics; and
 - For programs leading to occupations that require licensure, graduates' licensure rates.
 7. For 3 to 5 institutions at the median in terms of total exclusive distance education enrollments that offer exclusive distance education programs outside of the state where their physical headquarters is located and that can trace ownership to an entity that owns one or more institutions that offer the same programs in a format that is not exclusively distance education, the same data as requested in #6, above.
 8. Of the total number of students in California, New York, Massachusetts, Illinois and Florida who enrolled in exclusive distance education programs, all of the metrics from #6, above, disaggregated for students located in the state where their schools' headquarters is located and students located outside the state where the schools' headquarters is located.

