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Joint Committee on Finance

Paper #723

Educational Approval Board (WTCS)

[LFB 2015-17 Budget Summary: Page 539, #10, 158, #1, and 62, #16]

CURRENT LAW

The Educational Approval Board (EAB) is an independent state agency that approves and supervises for-profit colleges, out-of-state non-profit colleges and universities, and some in-state non-profit institutions, as well as solicitors recruiting students on behalf of an institution. Schools and solicitors representing schools reapply annually for approval from the Board. Additionally, the Board investigates student complaints, maintains student records following the closure of a school, and maintains a student protection fund comprised of fees collected from schools.

GOVERNOR

Delete \$711,800 PR and 6.50 PR positions annually by eliminating EAB, effective January 1, 2016.

Transfer the following functions to the proposed Department of Financial Institutions and Professional Standards (DFIPS): (a) authorizing proprietary schools that do business in Wisconsin and seek authorization from the state, defined as private trade, correspondence, business, technical, and other private schools seeking federal funding; (b) maintaining student records if a school operating in Wisconsin discontinues or may discontinue its operations and DFIPS determines that the records are in danger of being made unavailable to students or their authorized representatives and will not be maintained by the Wisconsin Association of Independent Colleges and Universities; and (c) creating rules and establishing standards necessary to fulfill these duties, including criteria and standards for issuing or revoking authorization.

Repeal statutory language requiring the inspection, examination, and approval of

proprietary schools and the provision requiring approved schools to submit a quarterly report, including information on enrollment, number of teachers and their qualifications, course offerings, number of graduates, number of graduates successfully employed, and other information required by the Board. Delete the provision requiring schools to pay student protection fees to be used for the full or partial payment of losses in the event that a school closure resulted in losses to students, parents, or sponsors.

Transfer to the Department of Agriculture, Trade, and Consumer Protection (DATCP) functions relating to consumer protection, including the authority to investigate complaints and potential violations related to proprietary schools and to establish rules and standards necessary to carry out these functions.

Repeal the following functions of the Board: (a) investigating and establishing minimum standards for courses of instruction and schools' facilities, equipment, instructional materials, and instructional programs; (b) establishing rules, standards, and criteria to prevent fraud and misrepresentation in the sale and advertising of courses and courses of instruction; (c) establishing minimum standards for refund of the unused portion of tuition, fees, and other charges if a student does not enter a course or course of instruction, withdraws, or is discontinued from the course; (d) requiring schools offering courses and courses of instruction to Wisconsin residents to furnish information concerning their facilities, curricula, instructors, enrollment policies, tuition and other charges and fees, refund policies, and other policies; (e) approving schools and courses of instruction that meet the Board's standards and publishing a list of approved schools and courses of instruction and a list of schools authorized to use the terms "college," "university," "state," or "Wisconsin" in their names; and (f) issuing permits to individuals soliciting the enrollment of individuals in a school.

Delete the provisions requiring an individual selling any course or course of instruction or soliciting students for a course or course of instruction to obtain a solicitor's permit.

DISCUSSION POINTS

1. EAB originated with the passage of the G.I. Bill in 1944, which required states to approve programs of education in all institutions serving veterans before veterans could receive federal education benefits. Originally called the Governor's Educational Advisory Committee, the organization began investigating and overseeing for-profit schools in 1957 and issuing permits to school solicitors in 1961. The agency was renamed the Educational Approval Board in 1968, and its responsibilities expanded in 1971 to include approval of all proprietary schools operating in the state and in 1993 to include approval of out-of-state non-profit institutions and in-state non-profit institutions incorporated after January 1, 1992.

2. EAB consists of seven members appointed by the Governor and has an authorized staff of 6.50 PR positions. These include an executive secretary (1.0 FTE), who is responsible for the administrative functions of the Board, as required by law; school administration consultants (3.0 FTEs), who provide guidance to new schools, review and approve initial and renewal applications, and investigate complaints; a program and policy analyst (1.0 FTE), who analyzes data collected

from schools, including student outcome data, and prepares publications and presentations on findings; and operations program associates (1.5 FTEs), who provide program support, including maintaining EAB's website, processing payments, and fulfilling student transcript requests.

3. EAB is funded through program revenue derived from fees paid by regulated schools. Ninety percent of fees collected from schools, including fees from the issuance of solicitor's permits or schools applying for initial EAB approval or applying to renew their approval, are credited to an appropriation for the general operation of EAB. The remaining 10% of collected fees, equal to an estimated \$77,500 in 2014-15, is, by statute, transferred to the general fund. Additional revenue is collected from fees paid by individuals requesting a copy of a student record maintained by EAB. The fee is based on the administrative cost of taking possession of, preserving, and providing the copy of the record, and all revenue from these fees is maintained in an appropriation for the preservation of student records. In 2014-15, \$594,400 PR is budgeted in the appropriation for proprietary school programs and \$12,100 PR is budgeted in the appropriation for the preservation of student records.

4. Additionally, EAB maintains a continuing appropriation for a student protection fund. This fund was established by the Legislature in 2003 Act 33 and is intended to compensate students, parents, or sponsors who experience losses following the unexpected closure of a school, the refusal of a school to issue a refund to which a student is entitled, or fraud or false representation used to procure a student's enrollment. Institutions approved by EAB contribute a dedicated fee equal to \$0.50 per \$1,000 of the school's adjusted gross annual revenue to replenish the fund if the amount in the fund decreases to below \$1 million. EAB staff indicate that the current fund balance is approximately \$1.4 million, and the most recent student protection fee was collected from schools in 2010. Approximately \$383,900 has been paid out from the student protection fund since August, 2014, as a result of the closure of Anthem College in 2014. The proposal would eliminate the student protection fund and transfer the fund's unencumbered balance to the general program operations appropriation for professional licensure under DFIPS.

5. EAB approves and supervises post-secondary institutions that serve Wisconsin residents, including for-profit colleges, out-of-state non-profit colleges and universities, and in-state non-profit institutions incorporated after January 1, 1992. Each of these institutions is required to seek approval from EAB prior to operating in Wisconsin and to annually renew their approval. Certain schools are exempt from EAB regulatory authority, including the following: (a) public colleges and universities; (b) in-state non-profit colleges that were either incorporated in Wisconsin prior to January 1, 1992, or had their administrative headquarters and principal place of business in Wisconsin prior to 1970; (c) schools regulated by other state agencies, including cosmetology, barbering, real estate, and certified nursing assistant programs; (d) religious schools; and (e) avocational schools. State law establishes that EAB oversight does not apply to schools, courses of instruction, and training programs that are approved or licensed and supervised by other state agencies or boards.

6. EAB's initial approval process requires schools to submit information about the following: (a) institutional planning, including the school's mission, intended market, strengths and weaknesses, and goals; (b) management, ownership, and governance, including an organizational

chart, an explanation of how the school will function, and bylaws related to the school's governance; (c) fiscal soundness and stability, including financial statements; (d) a surety bond in the amount of the lesser of \$25,000 or 125% of unearned tuition, meaning tuition, fees, and other charges paid by Wisconsin residents to enroll in a program for which the student has not yet received instruction; (e) teaching personnel, including the qualifications instructors or faculty members must have to teach, and school recruiters; (f) the school's advertising and promotional material; and (g) any legally binding enrollment contract used by the school.

7. EAB also requires schools to submit a school catalog containing the school's policy on the following: (a) admissions or entrance requirements; (b) advanced standing; (c) academic requirements and standards of progress; (d) student, financial, and academic records; (e) code of student conduct; (f) attendance, tardiness, and leaves of absence; (g) probation, dismissal, and readmittance; (h) tuition, fees, and refunds; (i) program outline and subject descriptions; (j) the instructional calendar; and (k) employment placement services. In most cases, EAB does not have specific requirements for school policies, but rather requires that schools establish policies in each area and make them available to students in written form. However, the EAB is required under state law to establish minimum standards for refund of the unused portion of tuition, fees, and other charges. Administrative rules developed by EAB require a school to provide a full refund if the student cancels enrollment within three business days, the student was accepted but later determined by the school to be unqualified, or the school procured the student's enrollment through false representation. A school must provide a partial refund based on the amount of time that has passed in the current enrollment period if the student withdraws or is dismissed before the period is at least 60% complete. Under the bill, state law would no longer require the establishment of minimum standards related to refunds.

8. In addition to reviewing the institution as a whole, EAB reviews curriculum and other information related to each program that will be offered to Wisconsin students, including a detailed program outline, learning objectives, course syllabi, a list of textbooks, instructor manuals, sample lesson plans, and a description of program testing and assessment. The detailed program review may be omitted if documentation is submitted showing the program and its curriculum has been reviewed or authorized by other approving or licensing organizations, including an organization in another state with substantially similar requirements as EAB for a distance learning institution based in another state, or if the school submits a written evaluation of the program conducted by a credible expert.

9. Minimum standards required for EAB approval include the following: (a) the program, curriculum, and instruction are of sufficient quality, content, and length as to reasonably achieve the program's stated learning objectives; (b) the school has a sufficient number of qualified instructors; (c) the school has adequate facilities, equipment, and instructional materials; (d) the school has a policy for the refund of the unused portions of tuition, fees, and other charges that meets minimum requirements established by EAB; (e) the school is in sound fiscal condition; and (f) the school has procedures in place to evaluate its educational programs, improve instruction, and review overall operations, including consideration of feedback from students, alumni, and instructors.

10. EAB requires schools that have completed the initial approval process to renew their

school and program approval annually. The renewal process requires schools to verify and update general information about the school, submit financial statements, report the amount of revenue generated from Wisconsin students, and provide student outcome data. Additionally, current law requires schools approved by EAB to submit quarterly reports with information on enrollment, number of teachers and their qualifications, course offerings, number of graduates, number of graduates successfully employed, and other information considered necessary by EAB. EAB provides student outcome information on its website for each approved program, as well as information about program costs, the availability of federal loans, and the student loan default rate.

11. The fees for initial school approval vary depending on the number and type of programs the school offers. Fees range from \$2,000 for one non-degree program to \$5,100 for one doctoral program, with a lower fee to approve each additional program offered by the same school. Initial application fees are reduced for a distance learning institution that offers only a bachelor's degree or higher and presents evidence of its accreditation and its authorization from its home state or another state in which the institution offers the same program, if the institution's home state gives similar Wisconsin institutions an equivalent reduction in oversight and licensing fees. The annual renewal fee includes an initial payment of \$500 plus a second payment based on the school's adjusted gross annual revenue, set at \$1.31 for each \$1,000 of revenue in 2014-15. Adjusted gross annual revenue is defined as the total revenue from the sale of goods and services to Wisconsin students in the previous fiscal year, including tuition, fees, books, supplies, and equipment, less any refunds made to Wisconsin students. EAB staff indicate that the renewal fee is intended to equal a predictable amount for small schools with relatively little revenue and to increase proportionately for schools with a larger amount of revenue.

12. EAB also conducts periodic site visits of approved schools, during which EAB staff complete the following: (a) interview administration, staff, and students; (b) look at student records and the record keeping system, including records of student outcomes; and (c) check compliance issues. Site visits are conducted approximately every three years for non-accredited schools and at the halfway point of the accreditation period for accredited schools, in addition to initial visits for new schools during the first six months of operations and again during the second year of operations. Most site visits are scheduled in advance, but EAB may conduct unannounced site visits in response to concerns about a school's operations.

13. EAB currently approves 252 post-secondary institutions, of which 243 are active and nine are inactive. Inactive schools do not complete the annual renewal process, and cannot currently enroll students or advertise, but can become active again without repeating the EAB's initial application process. Approximately 21,200 new students enrolled in an EAB-approved institution during the 2013 cohort period, consisting of all students who first enrolled in a program in a specified 12-month period beginning in 2013. It is estimated that approximately 40,000 Wisconsin residents are currently enrolled in these institutions. Schools approved by EAB collected \$351.6 million in tuition revenue from Wisconsin students over a 12-month period beginning in 2013.

14. Under the bill, DFIPS would authorize schools previously inspected and approved by EAB, if those schools chose to that seek authorization from the state. DFIPS authorization would satisfy federal law that institutions participating in the federal Title IV financial aid program must

first receive state authorization. However, schools would not be required to obtain approval before operating in Wisconsin as they are under current law. DFIPS would have authority to establish rules and standards for the authorization of schools, but under the bill would be required to include rules establishing that authorized schools must be accredited by an organization recognized by the U.S. Secretary of Education or the Council for Higher Education Accreditation and that schools are reauthorized at least once every four years. All rules promulgated by EAB would remain in effect unless amended or repealed by DFIPS. Under the proposal, DFIPS could assess fees sufficient to cover all costs incurred in the authorization of proprietary schools, to be established through administrative rule. Ninety percent of collected fees would be credited to an appropriation for the general program operations of DFIPS related to professional licensure, and the remaining 10% would be transferred to the general fund.

15. It appears that DFIPS authorization would be similar to procedures currently used to authorize schools licensed and regulated by the Department of Safety and Professional Services (DPS). Under current law, DPS is responsible for licensing aesthetic, barbering, cosmetology, electrology, and manicuring schools. These schools are required to obtain an initial credential, and to renew this credential every two years, based on a schedule specified in statute. (Under a separate provision in the bill, the length of a credentialing period would be extended from two years to four years.) An application for licensure by a school of barbering, cosmetology, aesthetics, electrology, or manicuring must include: (a) proof of an admissions policy that complies with DPS's standards, and copies of the relevant school catalogues, contracts used to enroll students, curriculum, and a detailed floor plan; (b) the articles of incorporation and the most recent annual financial report; and (c) a credentialing fee established through a biennial fee setting process, with passive review by the Joint Committee on Finance. Requirements for school and specialty school catalogues and contracts are also specified in statute, and certain deceptive trade, sales, and admission practices are prohibited.

16. DPS is also responsible for providing administrative support to various boards and councils, including the Board of Nursing, which is responsible for regulating schools of nursing. The Board of Nursing's responsibilities related to these institutions include the following: (a) establishing minimum standards for schools, including related clinical units and facilities; (b) making and providing periodic surveys and consultations to such schools; (c) placing qualified schools on a list of schools approved by the Board of Nursing; and (d) studying nursing education and initiating rules and policies for its improvement. Additionally, the Board of Nursing has the authority to require a site survey as part of the approval process, although DPS staff indicate that no visits have occurred recently.

17. DPS currently authorizes 90 schools, and 0.85 FTE have responsibilities related to licensing these schools. Of these, 0.75 FTE, shared among four employees, provide administrative support to the Board of Nursing, while 0.10 FTE supervises barbering, cosmetology, and other schools. DPS has indicated that the employees currently responsible for the licensure of schools would also fulfill the additional authorizing responsibilities under the bill, and additional position authority would not be needed to meet the bill's requirements.

18. DPS is required to determine fees for most initial and renewal credentials every two

years, as provided for under s. 440.03(9) of the statutes. In establishing these fees, DSPS is required to do the following: (a) recalculate the agency's administrative and enforcement costs attributable to the regulation of each occupation or institution; (b) by January 31 of each odd-numbered year, adjust each fee for the succeeding biennium to reflect the approximate administrative and enforcement costs of DSPS that are attributable to the regulation of the particular occupation or institution during the period in which the credential is in effect; and (c) within 14 days of completing the proposed fee adjustments, send a report detailing the proposed fee adjustments to the Joint Committee on Finance for the Committee's review and approval under a 14-day passive review process. While the Department has conducted the fee setting process in accordance with the statutes for each biennium since the change to the passive review-based fee setting process in the 2009-11 biennium, the Department has consistently recommended, and the Committee approved, maintaining most fees at the levels set in the 2009-11 biennium, rather than basing fees on the agency's costs of regulating each profession or institution. Consequently, although the fee study reflects costs ranging from \$659 to \$5,805 to regulate different types of schools, the 2015-17 initial fees for schools regulated by DSPS all equal \$75, and the renewal fees range from \$82 to \$170. There is no initial fee or renewal fee related to nursing school approval.

19. Under the bill, DFIPS would also take possession of and preserve the student records of a school that discontinues its operations if DFIPS determines that the records are in danger of being destroyed or otherwise made unavailable to students. Under current law, in addition to preserving student records, EAB provides other services to students in the event of a school closure that would not be provided by DFIPS, including authorizing the full or partial payment of any losses from the appropriation for student protection and providing assistance to students with transferring to a similar program at another institution and discharging private and federal student loans. Under the proposal, DFIPS could assess fees for providing a student record based on the administrative cost of taking possession of, preserving, and providing the copy of the student record. Collected fees would be credited to an appropriation for the general program operations of DFIPS related to professional licensure.

20. Current law requires school representatives who solicit Wisconsin students for any course or course of instruction to obtain a solicitor's permit from EAB. A permit is not required for recruitment activities that take place on the premises of the school. EAB staff indicate that the permits are intended to regulate recruitment practices in which students may sign binding enrollment contracts during a recruiter's visit to their homes or to other sites away from school premises. EAB indicates that 86 individuals representing 17 institutions currently hold solicitor's permits. In addition to an application fee of \$200 for initial approval and annual renewal, applicants must provide a \$2,000 surety bond, and the permit may be revoked if the individual provides false or misleading information to students or to the EAB. Under the bill, school recruiters would not be required to obtain a permit before operating in Wisconsin.

21. EAB is also responsible for investigating student complaints if an attempt to resolve a dispute through a school's established process is unsuccessful. If EAB determines that a violation of a statutory or administrative rule or an established school policy has occurred, EAB attempts to reach a settlement through mediation or conducts a hearing and imposes sanctions. EAB staff indicate that the agency receives about 50 student complaints each year, with approximately half

resulting in a formal investigation, and that the number of consumer complaints is limited by EAB approval and renewal process, which prevents schools from operating if they do not meet certain standards.

22. Under the bill, DATCP would be responsible for consumer protection functions, including investigating complaints and potential violations related to schools authorized by DFIPS. DATCP staff indicate that immediate costs would be associated with transferring and storing paper records and transferring electronic records, which would need to be converted into DATCP's electronic complaint database system. DATCP staff anticipate that it would be necessary to hire a project position or limited-term employee (LTE) to assist with the transfer of records, create informational materials and factsheets, train staff, and develop rules. Following the initial transfer, DATCP staff anticipate that the agency would be able to absorb the increased workload associated with student complaints without additional funding, and do not anticipate difficulties in acquiring sufficient knowledge of the industry to process and investigate complaints. Following the transfer of the EAB's unencumbered appropriation balances to DFIPS, the bill would allow for the one-time transfer of funds related to consumer protection, as determined by the Secretary of Administration, from the DFIPS appropriation to DATCP's appropriation for central administrative services related to state services. No ongoing funding or authority to collect fees is provided to DATCP.

23. Under current law, EAB is responsible for both investigating student complaints and approving and supervising schools. Therefore, if a number of complaints are received from students attending the same school, EAB is aware of these concerns when considering the school's annual renewal and may be able to address potential problems in the school's operations through the renewal process or through a site visit. Additionally, the EAB has the authority to impose sanctions on a school, including requiring the school to submit and implement an improvement plan or suspending the ability of a school to enroll students in a particular program. Under the bill, it could be the case that DFIPS would have limited information about student complaints filed with DATCP. Therefore, it may be preferable to keep both functions under the same agency.

24. EAB is the primary state agency responsible for overseeing for-profit colleges and universities operating in Wisconsin. In recent years, there have been concerns raised about for-profit institutions at the state and national levels because of the varied quality of their educational programming and because many of their students graduate with large amounts of debt. A U.S. Senate Committee on Health, Education, Labor, and Pensions investigation conducted between June, 2010, and July, 2012, concluded that although for-profit institutions can offer flexibility for non-traditional students and additional capacity to satisfy demand for higher education, many for-profit institutions engage in aggressive recruiting practices and charge higher tuition than comparable programs at public institutions, resulting in larger amounts of student debt. Additionally, a February, 2015, report published by EAB indicated that 43% of Wisconsin students attending a for-profit institution dropped out within the first two years of their program without obtaining a degree or diploma, compared with 18% of students attending a non-profit institution. Twenty-seven EAB-approved institutions, including 25 for-profit institutions, had a drop-out rate of greater than 40% in the first year of students' enrollment. Students who do not complete their degrees may be left with significant student debt and limited ability to repay their loans.

25. Some have expressed concern that under the proposal, some of the schools currently approved by the EAB would no longer be subject to any state oversight of educational institutions. Because DFIPS authorization would be optional for schools, it is not known how many schools currently approved by EAB would choose to seek authorization from DFIPS. However, one benefit of DFIPS authorization to schools would be that it would meet federal requirements for state authorization of schools receiving federal financial aid under Title IV of the Higher Education Act of 1965. Therefore, it is likely that the 145 schools approved by EAB that offer federal financial aid would seek authorization. The remaining 107 schools would not be required to seek authorization under state or federal law, but could choose to do so. Additionally, the bill would require that any school authorized by DFIPS have accreditation recognized by the U.S. Secretary of Education or the Council for Higher Education Accreditation. Schools currently approved by EAB that are not accredited would not be eligible for DFIPS authorization and therefore, would not be subject to their oversight. EAB staff estimate that approximately 100 schools currently approved by EAB are not accredited.

26. Some also question whether the level of oversight that would be provided by DFIPS would be equivalent to that currently provided by EAB. Under current law, EAB requires more information from the schools it approves than does DSPS, and provides a greater amount of information on its website. For example, EAB requires schools to report student outcomes, provides student outcome data on its website, and publishes an annual report analyzing the data. However, under the proposal, DFIPS would have authority to determine the information that would be required from schools for authorization, and it is not known if the information required by DFIPS would be equivalent to that currently required by DSPS or EAB. Additionally, it could be argued that requiring schools to seek reauthorization once every four years, as proposed under the bill, rather than the annual renewal required under current law, would decrease oversight and could result in concerns about a school's operations developing over a number of years before being addressed during the renewal process.

27. On the other hand, some argue that the EAB approval process creates a regulatory and fiscal burden for post-secondary institutions. Eliminating the requirements under current law would ease the process by which for-profit institutions and other institutions currently regulated by EAB could begin operating in Wisconsin. In addition to the initial application, schools would be freed from the requirements to submit annual renewal applications, report student outcome data, and participate in half- or full-day site visits by EAB staff. These requirements may be particularly burdensome for institutions that are based in another state and offer distance learning programs in many states, including Wisconsin, and which must fulfill approval requirements and pay related fees for each state in which they operate.

28. Under the bill, the statutory authority to authorize schools would become part of Chapter 440, which currently describes the responsibilities of DSPS, including the licensure of schools related to certain professions. DFIPS would be formed by merging DSPS with the Department of Financial Institutions (DFI). If the Committee chooses to approve the elimination of EAB but not the merger between DSPS and DFI that would form DFIPS, the authority to authorize schools that would be transferred to DFIPS under the bill would instead remain with DSPS.

29. Under the bill, the provisions related to the creation of DFIPS, including the elimination of EAB, would go into effect on January 1, 2016. However, the bill does not provide expenditure authority for EAB in 2015-16. A correction is needed to provide funding to allow EAB to operate between July 1, 2015 and January 1, 2016. The bill specifies that all of EAB's unencumbered appropriation account balances would be transferred to DFIPS immediately prior to January 1, 2016.

ALTERNATIVES

1. Approve the Governor's recommendation to eliminate EAB. Transfer authority to authorize proprietary schools and maintain student records following the closure of a school to DFIPS and responsibilities related to consumer protection to DATCP. Delete the remaining functions of EAB. Provide funding for EAB's operations until the effective date of the proposal.

ALT 1	Change to Bill
PR	\$297,200

2. Modify the Governor's proposal to retain one or more of the following functions of EAB relating to schools currently subject to EAB oversight. If DFIPS required additional position authority and funding to fulfill its expanded responsibilities, it could request this from the Committee through a s. 16.505/16.515 request.

a. Require that DFIPS maintain a fund for student protection. Provide that DFIPS would specify a student protection fee to be paid by authorized schools by rule, and that DFIPS must discontinue collecting annual student protection fees if the balance in the fund exceeds \$1,000,000. Specify that DFIPS would be authorized to make payments from the fund in the event that a school closure resulted in losses to students, parents, or sponsors. Create a new continuing appropriation under DFIPS for the fund, and provide that the unencumbered balance in EAB's student protection fund would be transferred to the new appropriation on January 1, 2016.

b. Require a solicitor representing any school authorized by DFIPS to obtain a solicitor's permit from DFIPS prior to engaging in recruitment activities in Wisconsin. Provide that DFIPS would have the authority to develop standards and establish fees for solicitor's permits by rule.

c. Require that DFIPS establish, by rule, minimum standards for the refund of the unused portion of tuition, fees, and other charges if a student does not enter, withdraws, or is discontinued from a course.

d. Require that DFIPS, rather than DATCP, investigate student complaints and potential violations of statutes and rules related to the authorization of schools. This alternative would maintain both the authorization of schools and the investigation of student complaints under one agency.

e. Require that schools authorized by DFIPS renew their authorization at least every two years.

3. Delete provision.

ALT 3	Change to Bill	
	Funding	Positions
PR	\$1,423,600	6.50

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