


STATE DIRECTORS
National Association of State Directors
of Career Technical Education Consortium

Program Integrity: Gainful Employment
Docket ID ED-2010-OPE-0012

September 2, 2010

Jessica Finkel
U.S. Department of Education
1990 K St. NW, Room 8031
Washington, DC 20006-8052

Dear Ms. Finkel:

The National Association of State Directors of Career Technical Education Consortium, representing the state and territory agency heads responsible for secondary, postsecondary and adult career technical education, submit the following comments in response to the notice of proposed rulemaking in the *Federal Register* published on July 26, 2010 regarding the Higher Education Act.

NASDCTEc is supportive of the Department's efforts to strengthen federal student aid programs and to protect students from incurring unmanageable amounts of educational debt. We understand that the proposed definition of gainful employment is aimed mainly at for-profit institutions where students in gainful employment programs acquire large amounts of student loan debt compared with students at community colleges: 88 percent of for-profit students take on student loan debt, compared with just 10 percent of community college students.

Our sense is that these proposed regulations will not hurt career technical education programs at public community colleges. If anything, they could lead to increased enrollment at community colleges as for-profit programs become ineligible for federal student aid dollars.

If you have any questions or need additional information, please contact Nancy Conneely, NASDCTEc's public policy manager, at 301-588-9630 or nconneely@careertech.org.

Sincerely,

Kimberly A. Green

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NASDCTEc Executive Director