



## Session 1 Top Issues:

- Appropriateness of debt-to-earnings metrics and if they should be an accountability metric.
- If the rule should be applied to all institutions of higher education. Public sector schools also scoffed at a disclosure requirement for all schools, citing cost burdens on schools.
- If debt-to-income metrics should be used at all in a new GE rule, or if a new set of metrics/standards should be considered. Some negotiators pushed for BLS data rather than SSA data;
- If current sanctions should be held in place. Most for-profit negotiators argued that the flaws in current metrics mean that high-quality programs will be shut down.
- Disclosures, and what those should be, dominated the last day of negotiations. The first session wrapped up with the Department promising to take the feedback from negotiators and issue a draft regulation prior to the 2nd session.
- ED officials are prepared to issue a draft proposal that they know public schools and consumer advocates will not like. That likely means removing accountability requirements and converting GE into a full disclosure rule that applies to all institutions.