

Cooper, Kathy

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From: ccdq@aol.com
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INDEPENDENT REGULATORY
REVIEW COMMISSION

The Pennsylvania Higher Education Assistance Agency has proposed updates to its financial aid regulations. Based on input from the higher education community, our association appreciates the positive changes and clarification proposals.

We do have one comment to help clarify the regulations:

121.32(b) 1 and 3 "...approved accrediting agencies recognized by the US Department of Education (USDE) or the Council for Higher Education Accreditation (CHEA)."

The previous language appears to place USDE and CHEA on an equal footing by use of the word "or." Yet, USDE actually approves accrediting agencies, while CHEA is a membership association that does not approve accrediting agencies.

PHEAA correctly added USDE to the proposed regulation but retained in the current proposed regs the 20 year-old language that included CHEA as an accreditation approval group. Twenty years ago that was appropriate language when CHEA actually provided an approval process for accrediting agencies under a previous name.

If CHEA is retained as an approval agency in the regulations, it could continue to cause some confusion for other approval entities like the Department of State's professional boards and the Department of Welfare Keystone Starts Program to name a few. In the past, they have used the CHEA membership list to restrict program participation for institutions and students.

Finally, it should be mentioned that the current standard for accreditation agency approvals is the US Department of Education. That Department provides approval and on-going oversight and monitoring of accrediting agencies for both basic and higher education.

I would suggest the removal of the phrases "or the Council for Higher Education Accreditation" in 121.32(b) 1 and 3.

Thank you for your consideration.

Richard Dumaresq