



Business, Consumer Services and Housing Agency– Governor Edmund G. Brown Jr.

Bureau for Private Postsecondary Education  
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**Advisory Committee Meeting Minutes  
Tuesday, November 10, 2015**

**Department of Consumer Affairs  
Hearing Room  
1625 North Market Blvd  
Sacramento, California 95834**

**Advisory Committee Members in Attendance:**

Shawn Crawford  
Margaret Reiter  
Tamika Butler  
Diana Amaya  
Katherine Lee-Carey  
Sylton Hurdle  
Laura Metune (for Assemblyman Medina)  
Marie Roberts De La Parra  
Ken McEldowney

**Committee Members Absent:**

David Wood  
Mitchell Fuerst  
Patrick Uetz  
Senator Jerry Hill (Appointed by the Senate Committee on Rules)

**Bureau for Private Postsecondary Education (Bureau) and DCA Staff in Attendance:**

Joanne Wenzel, Bureau Chief  
Alyson Cooney, Deputy Bureau Chief  
Norine Marks, Legal Counsel, Department of Consumer Affairs  
Mina Hamilton, Legal Counsel  
Leeza Rifredi, Licensing Chief  
Robert Bayles, Enforcement Chief  
Greg Pruden, Department of Consumer Affairs  
Victoria Morales, Staff Services Analyst  
April Oakley, Associate Governmental Program Analyst  
Benjamin Triffo, Associate Governmental Program Analyst  
Kent Gray, Associate Governmental Program Analyst

**Call to Order**

The meeting was called to order by Mr. Crawford at 9:33 am on November 10, 2015, at the Department of Consumer Affairs Hearing Room at 1625 North Market Boulevard Sacramento, CA 95834.

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### **Agenda Item # 1 - Welcome and Introductions**

Mr. Crawford welcomed the Advisory Committee, BPPE staff, DCA staff, and the public to the meeting. Staff counsel is noted as present.

### **Agenda Item #2 – Public Comments on Items not on the Agenda.**

Angela Perry, Public Advocates, wanted to thank Ms. Wenzel and the Bureau for providing all the materials in writing for the meeting. Secondly, Ms. Perry wants to encourage the Bureau to increase outreach to students of closed schools. Ms. Wenzel asked Ms. Perry's assistance with reaching these students, and requested that any ideas that she has be emailed to Ms. Wenzel.

Megumi Tsutsui, Housing and Economic Rights Advocates (HERA), noted that the group she works for has been actively conducting workshops for Corinthian students regarding their rights and options. Ms. Tsutsui noted that many former students do not know what their options are, and she would encourage the Bureau to conduct additional outreach to these students. Ms. Tsutsui also encourages the Bureau to increase their enforcement activities to prevent students from getting into similar situations such as those experienced by Corinthian students. She also noted that issuing a fine to a school is not a sufficient enforcement action, and she wonders why some schools have not had their licenses revoked or suspended.

No further public comment.

### **Agenda Item #3 – Approval of Minutes- August 19, 2015**

Ms. Reiter noted that she appreciates the added detail to the minutes, as it is very helpful. She also commented on agenda item three from the August 19, 2015 meeting, stating that her comments were to “move to approve minutes as corrected”. Mr. McEldowney motioned to approve the minutes, Ms. Butler seconded the motion. (Ms. Roberts De La Parra: Aye; Ms. Butler: Aye; Ms. Amaya: Aye; Ms. Reiter: Aye; Mr. Crawford: Aye; Ms. Lee-Carey: Aye; Mr. Hurdle: Aye; Mr. McEldowney: Aye). The motion passed.

### **Agenda Item #4 – Remarks by Awet Kidane, Director, Department of Consumer Affairs**

Mr. Kidane began by making note of the progress that the Bureau has made, but also of the work that still needs to be done. Additional resources have been beneficial, and have helped decrease the licensing and complaint backlog.

Mr. Kidane also noted that the Bureau has been going through sunset review, and that the report will be provided to the Legislature by December 1<sup>st</sup>. He stated that since the previous sunset review, the Bureau has made progress in areas such as: instituting quarterly Advisory Committee meetings; promulgating regulations for accreditation, compliance and complaint prioritization, and STRF; approving for profit Title 38 recipients; establishing the Task Force on Innovative Subject Matters; and posting denials on the Bureau website.

In regards to the Bureau's IT needs, there should be a new system in place by early 2016 that will help prioritize complaints and compliance inspections.

Mr. Kidane also mentioned that he is pleased with the work the Bureau has done with students who have been affected by school closures (transcripts and other matters).

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Ms. Reiter confirmed with Mr. Kidane that the IT system that is on track is indeed the substitute system, and followed up by asking about the status of a permanent solution. Mr. Kidane stated that the timeline associated with a new system will be known once there has been a finalized cost benefit analysis. Ms. Reiter asked if there is currently a consultant in place to conduct this analysis. Mr. Kidane stated that currently the Department is in the contracting process, and he will report back to the Advisory Committee once he has additional information.

Ms. Reiter also asked Mr. Kidane what he thinks the Bureau can do to further assist Corinthian students who are facing much confusion. Mr. Kidane stated that he agrees with Ms. Wenzel's comments that the Bureau has conducted outreach (both at closing and after) and if there are any additional ideas, the Bureau is open to them. Ms. Reiter recommended reaching out to Ms. Tsutsui and her organization.

No public comment.

**Agenda Item #5 – Update on the Progress of the Task Force on High-Demand Technology Fields Established Pursuant to California Education Code Section 94880.1**

Mr. Crawford began by providing an update on the Task Force, stating that there is currently a draft version of the report, and that the final meeting on December 1, 2015 will include a page by page review of the report. The final report will be submitted to the Advisory Committee by January 1, 2016.

Ms. Lee-Carey asked if the Task Force has been keeping track of ideas that have been proposed at the U.S. Department of Education that pertain to High Technology Programs. Mr. Crawford stated that the Task Force is aware of the happenings; however, they approached the report under the current landscape. Ms. Roberts De La Parra added that the Task Force focused on ensuring that the recommendations that they make are beneficial for students.

Mr. McEldowney asked if the makeup of the Task Force was similar to that of the Advisory Committee (institution representatives, public advocates, etc.). Ms. Wenzel stated that there are two Advisory Committee members, two institutional members, and an industry expert. She also noted that the Bureau reviewed complaints that they had received on these types of schools, and provided summaries to the Task Force so they can be aware of the issues that students are facing. The Task Force also heard from students of the institutions to learn about the variety of experiences that they had. Ms. Butler said that she echoes the concerns that Mr. McEldowney stated.

Ms. Reiter noted that she had a few comments after reviewing the draft report. She observed that some coding schools are being purchased by accredited institutions, and wants to know if the Task Force has considered this and how it would affect the disclosures that are provided to students. She also added that there is mention of student complaints in the report; however, there are no specifics. It may be beneficial to reach out to legal aid organizations, or the U.S. Department of Education to see what complaints they have received. Ms. Reiter also recommended that the Task Force review the portion of the report that speaks on the history of the Bureau. She also recommended that there be more clarity around the Task Force recommended modified School Performance Fact Sheet. Finally, Ms. Reiter requested

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that there be information provided on program cost, as well as data on completion and placement rates.

Ms. Roberts De La Parra stated that even though there was no dedicated consumer advocate on the Task Force, this vantage point was reviewed at length. The Task Force wanted to ensure that the needs of all students were met, and that all issues were viewed from multiple perspectives. Ms. Reiter added that this is good information to know, however, having additional information regarding completion and placement rates would be very beneficial.

Mr. Crawford added that all Task Force meeting minutes are on the Bureau's website, and they will also be attached to the final report.

Robert Johnson, California Association of Private Postsecondary Schools, noted that he appreciates the efforts of the Task Force, and that it has been taking new thinking and has driven it in different ways. He added that he hopes that the Advisory Committee views the report as something new and from multiple perspectives, and to not come to conclusions based off of past experiences.

Angela Perry, Public Advocates, shares the concerns about the lack of students, consumer advocates, or employer representatives. She does appreciate the effort the Bureau put forward in regards to providing student complaints to the Task Force.

No further public comments.

#### **Agenda Item #6- Bureau Operations Update**

##### **(a). Strategic Plan – Joanne Wenzel**

Ms. Wenzel began by stating that she will defer to Robert Bayles, who has been actively working with SOLID to draft the Bureau's Strategic Plan.

Mr. Bayles noted that the Bureau and SOLID are currently developing a survey that will be provided to various stakeholders, and that there will be focus group meetings with executive staff and managers. Advisory Committee members should be receiving an email that will ask for comments, contain the survey that is being developed, and a request for a one-on-one interview. The goal is to have the Strategic Plan completed by February.

Ms. Reiter asked for details about what the Strategic Plan will include. Mr. Bayles stated that the plan will be a document that helps guide the Bureau in meeting their mission over the next several years.

##### **(b). Enforcement Report – Robert Bayles**

Mr. McEldowney began by asking Mr. Bayles if he could provide a background on the 1000 outstanding complaints (i.e. the oldest complaint, prioritization of complaints, etc.). Ms. Wenzel stated that she does not have this data with her, but it is available. However, these numbers are down from previous numbers, and are currently below 1000 pending complaints. Of those complaints, over a third are internally generated. An estimate for the average time to close a complaint is around 555 days. Mr. McEldowney requested a breakdown of this data for the next meeting.

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Ms. Reiter asked if the Bureau can provide the length of time it takes from receipt of complaint to assignment for investigation. Ms. Wenzel stated that currently it is less than ten days. Ms. Reiter followed up by asking if the Bureau has a goal for when they can say that all of the complaints being worked are from a certain point (six months, three months, etc.). Ms. Wenzel said that the goal is to have the turnaround time be 180 days, and that the Bureau should be able to get there within 2-3 years. Even though there have been additional complaint investigators hired, it takes a while for new hires to get up to speed (up to six months). Ms. Butler asked if the 2-3 year window will decrease once these new employees get up to speed. Ms. Wenzel stated that that is already built into the 2-3 year window.

Mr. McEldowney was concerned that 180 days is still too long, and asked what the goals of other boards and bureaus are. Ms. Wenzel stated that 180 days is a DCA expectation.

Mr. McEldowney also asked if students have the ability to go to small claims court. Some Advisory Committee members suggested that it would depend on arbitration clauses that are provided to students, as well as the dollar threshold of the small claims court.

Ms. Wenzel also provided an update on the statistics that were provided to the Advisory Committee for both complaints and citations.

Mr. Bayles shared that in Fiscal Year (FY) 14/15, the Bureau conducted 220 compliance inspections (17% increase from previous FY), issued 109 notice to complies (18% increase from previous FY), and 96 enforcement referrals (266% increase from previous FY). Mr. Bayles attributes these increases to increased staffing, and process improvements.

Ms. Metune asked if schools that are going to be approved by means of accreditation are required to have a compliance inspection before becoming Title IV eligible. Ms. Wenzel stated that the Bureau has not heard back from the Department of Education on this item yet.

Ms. Reiter asked if the Bureau has been using the PUC process to shut off unapproved schools phones. Ms. Wenzel stated that she does not have those numbers with her at this time.

Ms. Metune asked if the Bureau would be open to doing outreach to students to discuss common complaint issues (information a student would need when filing a complaint, similar to how the licensing unit puts on workshops). Ms. Wenzel stated that she would be open to this idea, but reaching the students may be difficult. Mr. Crawford recommended having this information present in a FAQ section on the Bureau's website.

The Advisory Committee also discussed proactive actions the Bureau can take to reach out to students at struggling institutions. Ms. Lee-Carey made note that the Bureau is not the only active participant in regulating schools, as there is also the US

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Department of Education, and the school's accreditor. She believes that the Bureau should be mindful of staying within its statutory charge.

Mr. Bayles stated that the Bureau receives a list of schools on the US Department of Education's Heightened Cash Monitoring list. Along with this list the Bureau also receives a copy of the letter that school is sent, in order to provide details as to why the school is on the list. Mr. Bayles noted that being on a Heightened Cash Monitoring list is not always an indicator that a school needs to have a compliance inspection; however, if the school is having accrediting issues, an abundance of student complaints, or meets other criteria, the school will become a priority for the Bureau to inspect.

**(c). Licensing Report – Leeza Rifredi**

Mr. Crawford began by stating that having a breakdown of the licensing unit's numbers in a similar fashion as discussed with Mr. Bayles would be extremely beneficial. He also stated that it would be helpful to have information on the number of denials that the Bureau issues.

Ms. Rifredi reviewed the numbers that were provided to the Advisory Committee, and also reviewed updated numbers as of November 1<sup>st</sup>. Ms. Rifredi noted there are 39 pending and 134 under review initial applications, 101 pending and 128 under review for renewal applications, 140 in process and 13 pending substantive change applications, and 19 in process and 2 pending for verification of exemption. She added that the application backlog has been decreasing. Ms. Rifredi believes this is due to staff training, process improvements, and the workshops that the Bureau is conducting.

**(d). Student Tuition Recovery Fund (STRF) and Outreach– Alyson Cooney and Victoria Morales**

Ms. Cooney began by noting that she and Ms. Morales will be updating the Advisory Committee on both STRF and Bureau Outreach efforts. Ms. Cooney started by noting that the Bureau receives hundreds of emails and phone calls on a weekly basis, with a goal of responding to students during the same day to provide one-on-one consultation. She also noted that the University of San Diego (USD) has reached out to the Bureau to inquire about jointly putting on workshops for students who have been affected by a closed school. Ms. Cooney said that the Bureau has reached out to USD, but has not heard anything back.

In regards to outreach, Ms. Cooney added that since February the Bureau has attended ten outreach events, with two additional events planned in 2015. The Bureau is also working with DCA to create five, one minute videos. Topics include how to research a career, how to research a college, performing a college cost benefit analysis, what schools provide upon enrollment, and what to expect after graduation. The videos will go live in January 2016. This overall campaign will also include a social media component, as well as a revamping of the student page on the Bureau's website. In addition, the Bureau has recently partnered with several organizations that specialize in financial aid and counselling.

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Ms. Butler and Ms. Lee-Carey noted that it may be beneficial for the videos to have subtitles in alternate languages, as well as closed captioning. Ms. Reiter added that a potential video topic should be, “What do you do when things go wrong”.

After finishing with Bureau’s outreach efforts, Ms. Cooney and Ms. Morales began to speak on STRF. Currently there are 266 in-house STRF applications, of which 45 are awaiting loan discharge, 101 are waiting on additional information from students, leaving 120 that are actively are being worked. Currently there are 44 claims at the State Controller’s Office waiting for a check to be issued. In regards to Corinthian, there have been 275 claims since the school has closed, 36 have been paid for a total of \$145,273.

Mr. McEldowney inquired on the number of claims that have been rejected, as well as additional information on the backlog of STRF claims. Ms. Cooney stated that she did not have that information with her, but it can be provided at future meetings. Ms. Morales stated that there is no backlog, and each claim has begun to be worked. Approximately 95% of claims are waiting for loan discharge.

Ms. Reiter mentioned the transfer of credit issue that was addressed at previous Advisory Committee meetings, and how the Bureau handles a situation where only some student credits transfer. Ms. Morales stated that the Bureau issues a pro-ratio refund to the student loan lender for a loan pay down (for any credits that did not transfer for the student’s major). Ms. Reiter recommended reviewing the regulations to see if this is the proper way to handle these situations.

Ms. Lee-Carey inquired on the balance of the STRF fund. Ms. Wenzel stated that it is approximately \$28 million dollars.

Ms. Morales next provided the Advisory Committee an overview of the STRF process. Ms. Morales stated that she first verifies if the school that the student attended was an approved school, she then verifies if the student lived in California during the time of enrollment, there is then a check to see if the student has any private or federal student loans or if any cash payments have been made, she will verify the student ledger, ask for proof of attendance, then determine if there is an economic loss. There is then a summary created with the recommendation, which is then sent to Ms. Cooney for approval.

Ms. Metune asked Ms. Morales to discuss the loan discharge process. Ms. Morales noted that the loan discharge comes from the loan lender. The lender provides the student with a letter stating whether the loan has been discharged, and Ms. Morales asks for a copy of this letter to determine the student’s economic loss. Ms. Metune followed up by asking approximately how many students who attended a Corinthian school have successfully had their loans discharged. Ms. Morales estimated that that number is around 95%.

Ms. Metune also recommended working with various legal aid organizations to ensure that students are being provided all the support and options possible.

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Angela Perry, Public Advocates, requests a more thorough breakdown of enforcement backlog data, information on the procedures that the Bureau is using to reduce backlog, a more thorough breakdown of licensing backlog data, and information on the number of Bureau staff who are assigned to work on complaints and applications. Ms. Perry also recommends that the Bureau offer workshops that focus on student complaints or school closures, and she would also like to thank the STRF analyst who spoke with to the Advisory Committee, and finally recommends reviewing the closed school materials to make them easier to understand and potentially in alternate languages.

No further public comments.

Adjourned for lunch at 12:11p.m.

Reconvened at 1:09 p.m.

Mr. Crawford reconvened the meeting by noting that there has been a request from Ms. Reiter to review the closed school guide that has been provided by the Bureau. Ms. Wenzel began by reviewing the Bureau's processes when it comes to school closures (both when an institution is cooperative and when it is not); the common theme being that the Bureau has staff within a close proximity of the school, reviewing future options with effected students.

Ms. Wenzel invited Robert Bayles, Enforcement Chief, to speak on the student survey that was provided to the Advisory Committee. Mr. Bayles stated that the Bureau has had a working group that has discussed the effectiveness and content of the student survey, and they are currently working on a draft of a new survey with the hopes of having it ready by the next Advisory Committee meeting. Mr. Crawford made the recommendation that the Bureau focus on using structured data when it comes to the next version of the student survey.

Ms. Reiter noted that the closed school guide is not up-to-date with current statute, and she is concerned that students aren't being provided all the information that they need. She also noted that it may be beneficial to have a paragraph near the beginning that discusses student rights under various scenarios (federal loan discharge, STRF, etc.) to help ease student confusion.

Mr. McEldowney asked what happens when a student can't get their records when the school closes. Ms. Wenzel stated that the Bureau exhausts all options in order to secure transcripts when a school closes before saying they have been unable to acquire the documents.

Mr. McEldowney also asked if the forms being discussed are in languages other than English and Spanish. Ms. Wenzel stated that the Bureau is going to be reviewing all forms and the languages that they are provided in.

Ms. Wenzel noted that she has been advised by legal counsel that review of these documents are not an agenda item, and that further discussion will need to take place when it is included on the agenda.

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**Agenda Item #7 – Review and discuss the fee schedule in Ed. Code section 94930.5, pursuant to Ed. Code sections 94880(c) and 94931.5**

Matt Nishimine, DCA Budget Office, is present to discuss revenues that the Bureau derives from various fees. Mr. Nishimine began by stating that for the first quarter of FY 15/16 revenues have stabilized; however, the Bureau is operating with a structural deficit. This is a structural imbalance that is driving the fund to insolvency, and now is a good time to review the Bureau's fee structure.

Ms. Nishimine stated that while there is no formal recommendation from the Budget Office, there have been observations made as it pertains to fees. Currently the annual fee paid by institutions represents 85% of the Bureau's revenue. If adjusted, this will have the greatest impact on the Bureau's revenue. This fee is calculated by multiplying an institution's revenue by three-quarters of one percent, with a maximum cap of \$25,000. Some options that could be considered would be raising the cap, raise the percentage paid, or establish a fee minimum. Raising the percentage paid will affect all schools (though smaller schools may feel a greater impact), and adjusting the cap will affect the highest revenue schools. Other options may include removing the cap (though some larger school will end up paying over one million dollars each), or doubling the cap (which would produce approximately an additional three million dollars). Ms. Nishimine also noted that there currently is no minimum fee, and that there are 150 fifty schools that pay less than one thousand dollars in fees.

Mr. Nishimine stated that a second area for consideration would be the annual fee for institution branches (currently one thousand dollars). It was noted that Bureau shows that the workload for branches are similar to those of mains. Mr. Nishimine noted that some solutions may be raising the fee; creating a tiered system; tie the fee to revenues like the annual fee; or tie the fee to student populations. Currently there are approximately 400 branches with revenues of \$400,000.

An additional area reviewed by the Budget Office was the change in educational objective fees. Currently the fee is \$500 per application, and each application may include multiple changes (there is no limit for the amount of course changes on each application).

Mr. Nishimine stressed that fee levels should be commensurate with the workload of the Bureau, and opened the floor for questions.

Mr. Crawford asked if there is a reason that the Bureau has not requested a formal review of their fees (fee audit). Ms. Wenzel stated that the CPS report went into depth on the time/resources that it takes to perform tasks associated with each fee, and the Bureau uses this data for the budgeting process.

Ms. Reiter asked how soon a fee audit should be conducted, and when the Advisory Committee could expect to have data.

Mr. Nishimine stated that a formal fee audit typically takes a couple of months to complete, but perhaps it would be less with the Bureau given that there are only fifteen fees to review.

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Ms. Wenzel added that it is not entirely clear if the Bureau can raise fees through regulations, and if it was done through regulations, it can take up to 18-24 months. Ms. Lee-Carey added that it may be better to address this issue during sunset review.

Mr. McEldowney asked if the budget is based on expected fee income. Mr. Nishimine stated that that is not entirely true, since FY 13/14 the Bureau has added positions, going from roughly 60 positions, to 101. One of the main issues is that revenue that was supposed to come in from SB 1247 never materialized; the budget was based on those revenue projections.

Ms. Lee-Carey stated that non-accredited schools, though smaller, require a larger workload from the Bureau. These schools cannot afford a large fee, so having fees commensurate with workload may not be true in all scenarios.

Mr. McEldowney noted that he would be interested in seeing what the revenue increase would be if fees were raised by \$10,000.

Ms. Lee-Carey stated that there is an inequity in how fees are currently structured. She believes that there needs to be a review of how fees would impact schools that have various organizational structures (schools with multiple main locations, schools with main locations and multiple branches, etc.).

Ms. Reiter asked what the legal concern is for raising fees through regulations. Ms. Wenzel stated that the law allows for an adjustment to fees (which can be subject to interpretation) and that the Bureau needs to consider if this is an adjustment or a restructuring of fees.

Ms. Reiter asked if the Bureau should consider doing a complete fee audit, or pulling data from the CPS report. Mr. Crawford agrees, and believes that the Bureau should start by looking into the expense of conducting a fee audit.

Ms. Wenzel believes that there is now a direction of where this needs to go, and that this conversation will be continued at the next meeting.

No public comment.

**Agenda Item #8 – Review of BPPE’s Responses to Issues Raised by the March 2014 California State Auditor Report**

Ms. Wenzel began by providing an overview of the Bureau’s audit, along with the audit recommendations, and responses. There were 33 recommendations, of which, currently seven remain open. Ms. Wenzel went on to review the open recommendations, and the Bureau’s responses to each one.

Mr. Crawford asked Ms. Wenzel if there are any recommendation responses that the Bureau feels unsure about. Ms. Wenzel stated the recommendation around complaint prioritization still has work to do, due to the fact that there are outstanding regulations, and the IT system is not live yet.

Ms. Wenzel continued by reviewing each open recommendation, and explained the steps the Bureau has taken to fulfill the recommendation.

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Angela Perry, Public Advocates, would like to thank the Bureau for reviewing this information, and providing clarity to the audit process.

Ms. Wenzel added that once the Bureau receives feedback from their submissions to the auditor, the information will be on the next Advisory Committee agenda.

**Agenda Item #9- Regulatory Update**

**(a). Accreditation Regulations (Title 5, California Code of Regulations Sections 70000, 71400, 71650, 75150 (proposed changes), 71105, 71105.5, 71410, 71471, 71775, 71775.5, 74240, 74250, 75140 (new))**

Ms. Wenzel stated that the Accreditation Regulations are currently at the Office of Administrative Law, and the Bureau expects to hear back on them by November 23, 2015.

**(b). Reports (Title 5, California Code of Regulations Sections 74110, 74112)**

Ms. Wenzel noted that the 15 day notice of modified text has just been completed, and that the Bureau is currently reviewing comments that were received. The Bureau will be sending out an additional 15 day notice of modified text in the near future.

Mr. McEdlowney asked if the modified text was available for public comment for forty-five days. Ms. Wenzel stated that they were not.

**(c). Student Tuition Recovery Fund (Title 5, California Code of Regulations Sections 76000, 76020, 76120, 76130, 76200, 76210, 76212, and 76215)**

Ms. Wenzel stated that the STRF regulations are going through internal review, and currently there is no estimate on when a public notice will occur.

**(d). Compliance Inspection and Complaint Prioritization (Title 5, California Code of Regulations Sections 75200 (proposed changes), 75210 and 75300 (new))**

Ms. Wenzel noted that this regulation package is also going through internal review, and there is no estimate on when a public notice will occur.

Angela Perry, Public Advocates, wanted to thank the Bureau for considering Public Advocates' comments, in-particular around gainful employment and the reports regulations. Ms. Perry added that the 21 day requirement for gainful employment is too short, and recommends a 45 day window.

No further public comment.

**Agenda Item # 10 – Potential Dates and Agenda Items for 2016 Meetings**

The Advisory Committee reviewed the proposed 2016 meeting dates, with individual members making note of any known schedule conflicts. Ms. Wenzel also reviewed the expectations surrounding agenda meeting topics, as well as the process the Bureau takes to create the agenda and meeting materials.

No public comment.

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**Agenda Item #11- Adjournment**

Meeting adjourned at 2:40 pm