

March 27, 2023

Emily A. A. Dow, Ph.D.  
Assistant Secretary for Academic Affairs  
Maryland Higher Education Commission (MHEC)  
6 N. Liberty St., 10th Fl.  
Baltimore, MD 21201

By Email

Dear Dr. Dow,

The undersigned organizations, representing a coalition of non-profit consumer, veterans, and student groups, write in strong support of proposed regulation 13B.01.01 “Minimum Requirements for Private Career Schools” to implement Chapter 546, Acts of 2020, Veterans’ Education Protection Act, codified at Md. Code Ann., Education §11-210 (2020). The proposed regulatory amendments and new regulation create a process for MHEC to monitor and enforce applicable institutions’ compliance with the aforementioned law by requiring them to submit specific information regarding their revenues to the Commission on an annual basis.

We commend the proposed regulation for its faithful implementation of the statute while minimizing compliance burdens for schools by tracking the analogous federal regulation in 34 CFR § 668.28. The implementation of this rule will further strengthen protections for student veterans in Maryland in particular by tracking schools that fail in two of the immediately preceding three years.

Sincerely,

New America, Higher Education Program

Veterans Education Success

Veterans for Common Sense

David Halperin, Esq.

Robert Shireman, The Century Foundation

The Institute for College Access & Success