

DEPARTMENT OF EDUCATION
OFFICE OF POSTSECONDARY EDUCATION
PRISON EDUCATION PROGRAMS SUBCOMMITTEE
SESSION 1, DAY 3, AFTERNOON
October 20, 2021

On the 20th day of October, 2021, the following meeting was held virtually, from 1:00 p.m. to 3:00 p.m., before Jamie Young, Shorthand Reporter in the state of New Jersey.

P R O C E E D I N G S

MR. WASHINGTON: Welcome back to the final afternoon session of our first our first subcommittee meetings. The afternoon of day three. Before Kim, you had asked a question about what we're doing in FSA to kind of like ramp up and like for prison education programs and different things FSA is doing in terms of FAFSA completion. So what I wanted to do is turn it over to my colleague, David Musser in FSA to talk a little bit more about that.

MR. MUSSER: Sure, thanks, Aaron. Yeah, I thought it would be helpful just to give a series of things that the Department and FSA are doing to make the process for applying for Title IV aid and maintaining Title IV aid eligibility easier for incarcerated individuals. So I'll go through the things that we're working on. And if you guys have any questions or any other suggestions, we'd certainly be open to hearing those. So the first one I wanted to mention is that as many of you know, Congress eliminated the Selective Service and drug drug conviction limitations on Title IV eligibility. FSA has already implemented a change in eligibility requirements for the current award year. But we're also going to be removing that question from the FAFSA in the 2023-24 award year. So hopefully, that will

cut down on the number of individuals who decide not to complete the FAFSA, because because they think that that could affect their eligibility. We we hope that that makes a positive impact for them. We're also collaborating as, and we talked about this in an earlier session, we're collaborating with, with other Department staff to determine ways for to make it easier for incarcerated students to get out of default, or overpayment on Title IV grants in order to regain Title IV eligibility when that happens. And that could include a variety of things for all the way from, you know, just just how they get out of default in the first place to the specific require servicing requirements for for when they contact service for about something like this. We're also proposing as as part of this process to restore a student's lifetime eligibility, if they cease if if their school ceases offering programs in the students' facility. And FSA is working on the details for how that how that would work. We are also working to establish a process to identify incarcerated students as part of the application process so that we can account for their special circumstances. And that could potentially include different requirements for completion of verification, something that Department is working on right now. Then finally, I wanted to mention, we're also thinking about

some more minor changes. We've heard from, from various folks that there are occasions where student incarcerated students can't receive paper Student Aid reports, because it's on colored paper, it's easier for them to receive it on white paper. So we're working on trying to ensure that once we've identified someone as incarcerated, that we send them something that their report on white paper to help improve the chances of reaching them if they don't have internet access. There's also some little things in terms of how what we require for completion of paper FAFSAs. We traditionally have required the use of black ink, we plan to relax those requirements, because sometimes, facilities have specific requirements for the use of different kinds of ink in their facility that may not be black. So we want to be sure that that's not an impediment. And then lastly, longer term, we're considering other changes that might make it easier for incarcerated students. We have to acknowledge that for now, we think that paper FAFSAs are still the likeliest method for incarcerated students to use to apply for the FAFSA, we recognize that that can be a cumbersome process. And we also recognize that financial aid administrators often have to assist in that process pretty substantially. So we're considering ways that we could also streamline that process and make it easier for

students to to complete a version of the electronic process if they don't have internet access, or some other way for financial aid administrators to serve to help them and reduce the burden on the students. So that's that's the list of things that I have I will I want to open it up to the group if you guys have questions about any of those or anything else that I can help explain on that front.

MS. MCARDLE: Kim.

MS. CARY: Thank you David for addressing all those and letting us know I'm sure there's a lot of feedback the Second Chance Pell's financial aid administrators could provide. So I will let NASFA know that we are willing to provide feedback to them if they want to be our, our go between and I know we use that quite a bit. So, what about specifically with dependent students? I know you touched on the verification. and just the dependency requirements. I don't know the status of a student who is incarcerated, they are considered, you know, ward of the state or things like that. I don't know how, what that language looks like, and it can be extended to incarcerated individuals.

MR. MUSSER: And that's an area that, that we have not yet found a way to address. Currently, if an individual does not meet one of the dependency

requirements to be considered an independent student, they'd still be considered a dependent student, and may have to obtain their their family's financial information to complete the FAFSA. So we're still thinking about that one. And we know that one's challenging, but it's something I'll have to take back and talk over with my FSA colleagues and my Department colleagues to see if there's any way that we can overcome that particular hurdle. We know that that is challenging that, that getting that out documentation from outside sources is one of the biggest hurdles that incarcerated individuals face with their application. So it's something I'm happy to take back.

MS. CARY: Stan.

DR. ANDRISSE: I just wanted to thank you David, for that and for the information you provided and for what you know FSA is doing for incarcerated students and just understanding the situation so well, as you do. I would also want to know a little bit more about students who are in default, and how, you know, what your view, you know, what, what are you doing in that range, because a lot of I mean, there are a number of student incarcerated students who have defaulted and thus need that addressed.

MR. MUSSER: So I can't comment on

exactly what our approach is going to be, because I think the Department still has to make a final decision about how we're going to move forward with it. But I can tell you what we've heard from incarcerated individuals and other advocate groups that we'd like that we are trying to address. And it's mainly the fact that incarcerated individuals, simply it's really challenging for them to make the number of on time payments that do they need to make in order to get into a rehabilitated status. And so what we're looking at now are, there are a few other ways that that individuals can get back into an in an in repayment status. And what what we're thinking about are ways that we could adapt those for incarcerated students. So again, without going too much further down that road, I just want to say, that's kind of the direction that we've been considering. And we also are considering ways that we can help improve the process for sort of sort of seeking the the seeking assistance to get out of default. Recognizing that, you know, getting on the phone with a servicer is often the traditional way of doing that. And that's also very challenging for incarcerated individuals. So that's another thing that we're trying to figure out how, and amid some of the other things that we're working on and servicing, how we can help address that and make that process a little easier.

MS. MCARDLE: Stan and then Kim

DR. ANDRISSE: Thank you again, David.

I would also just so we work, my organization works closely with individuals that fall into that category, and we help them in that particular regard. I would love to have conversations. I mean, you mentioned that, you know, you're figuring these solutions out by talking to incarcerated students and advocacy groups for them, I would love to have a conversation and be involved in those conversations, you know, be involved in that thinking process of how to address that, as we as we work with a lot of students in that in that position.

MR. MUSSER: Sure, I'd be glad to hear your suggestions, and we could talk about that offline.

MS. MCARDLE: Kim.

MS. CARY: I would also share that I encourage financial administrators that are listening in to make that part of your onboarding process. Once we know what the Department is going to require of those individuals to be the go between to help them connect with those servicers or whatever that ends up being. That's just going to be part of making them successful. That's just part of something that they should be looking at helping with.

MR. MUSSER: And I also just want to

say thanks for for your suggestions on this Kim and if if your schools or NASFA have suggestions, we're also very interested in those on from the school perspective as well.

MS. CARY: Thank you, David.

MS. MCARDLE: Oh Sorry, Marisa.

MS. BRITTON-BOSTWICK: I think just to piggyback off Kim, I think would be so important in the correctional facilities too that we have all the appropriate information for individuals that are going to be in this program. So thank you for those ideas.

MR. MUSSER: Sure. Thanks, everyone.

MS. MCARDLE: I see no other hands.

MR. WASHINGTON: Thank you for that.

David. Let's launch into the last discussion on the regulations that will be about we're still in the best interest and interest determination. But we'll be talking about the remaining indicator. So Vanessa, would you mind posting or projecting the amendatory language, please? Thank you. Yep, right there's perfect. So we have three remaining indicators. And we suggest defining the inputs as serving the best interest of students, when they provide the same level of services to students who are incarcerated, as to those who are not. So I think we can kind of take all of them as one and while they're

distinctly different, our-- what we've added to the statutory language is essentially similar. And so for, for E, we see whether the experience, credentials, and rates of turnover or, or departure of instructors for a prison education program. That's kind of where the law cuts, that is where the law cuts off, we've added "is the same or similar to the experience credentials, and rates of turnover, departure of instructors for non prison education," non prison education, non prison education programs offered by the institution. And we've done we've added similar language, about the transferability of credits and also whether the institution offers relevant academic and career services to participating, confined or incarcerated individuals while they're incarcerated in advance of reentry, or upon release. And so you see, we've added some language to all of all three of those indicators. And Vanessa, if you could just scroll down, I wanted to just remind them remind folks, I'll tell you when to stop. Keep going. Let's see. Let's see, keep going. Let's stop right there. So I just want to remind folks that about the accreditation piece, if you see number ten, romanette, three, "reviewed and approved the methodology for how the Bureau of Prisons or State Department of Corrections or other entity made the determination under E-G," that's what we're talking

about, to ensure that the prison education program meets the same standards as the same or substantially similar programs that are not prison education programs at the institution. We do have Elizabeth Daggett from the accreditation group here with us again today until 2pm. And so she will also be able to provide insight on how their credit on the role of the accreditor in this as well. So Vanessa, if you wouldn't mind scrolling back up so folks could see the best interest piece again. And I will stop there and open it up for conversation.

MS. MCARDLE: Belinda.

MS. WHEELER: Thank you very much. I just wanted to say that I think that these three standards are really important. I think that they align very well with what we expect in the on the accreditation side of things with our traditional, you know, classrooms for students, and I feel that, you know, people who are incarcerated and undertaking you know, university or college programs deserve this the same or as close to the same, you know, standards, quality that they would expect if they were a traditional student. So I think that these three points are very good guardrails for everyone in this space and I think it helps protect students. So thank you for having this language there.

MS. MCARDLE: Marisa.

MS. BRITTON-BOSTWICK: I would agree with Belinda I think these are so important and very much needed in here. So thank you.

MS. MCARDLE: Stan.

DR. ANDRISSE: I would also agree that these are very, very needed to gauge quality. I do have, you know, concern or question as to what is in mind with turnover? As you know, a lot of times, prison education programs are hiring, you know, professors or instructors that don't hold tenure track positions or regular positions at the institution, and they're brought in to teach a special course, as you know, they're seeking, for instance, to make the curriculum a little more culturally sensitive and responsive to the, to the population it's being delivered to. So in that regard, sometimes the turnover is slightly different than the on campus program. And, you know, you know, just just to have that in mind, and for us to think about here, that difference between, you know, the prison education program, and the non prison education programs at an institution.

MS. MCARDLE: Aaron.

MR. WASHINGTON: Stan, is there any language or if you can think of any language, you know, before the second session that we could add to account for circumstances like that? That would be really helpful

for the Department.

DR. ANDRISSE: Yeah, I can, I can certainly do that. And bring get that back. I mean, to something without without thinking of the exact language, but to what the metric of same or similar is the similar part gives room for, you know, interpretation. So I think this may be the place for the Dear Colleague type letters, where that is explained there, for instance, and it's really the interpretation that needs that understanding of what I what I've mentioned.

MR. WASHINGTON: Yeah, and that's exactly what I was gonna follow up with, you know, we say, "same or substantially similar." And I would, you know, for any, for any of the subcommittee members that are either based at a postsecondary institution, or have experience at a postsecondary institution, if you have any thoughts on the same, or substantially substantially similar language in there, I think that what Stan just said is, you know, a, an idea could be to, you know, we anticipate probably getting questions on that. So maybe we can further expand on that, and a Dear Colleague letter, sub regulatory guidance, preamble language, or do you all think that more regulatory language needs to be added here to further describe "same or substantially similar?"

MS. MCARDLE: Kim.

MS. CARY: Thank you. I think one of the things we need to take into consideration and I'm not sure how we would write the language for it, but one of the hurdles that we ran into when we were trying to establish our educational program with in our first program in the Second Chance Pell was the the institution we were working with, had very large restrictions as far as types of ways that incarcerated individuals could communicate with us. Whether it be if it was seated, or online, we had to follow certain protocols with the online connections that we had, it wasn't normal internet connections, certain tablets had to be used, I can see that being varied from correctional facility to correctional facility. One of the barriers was when we talk about similar instruction, when you have an online class or a seated class, you have the ability to talk amongst yourselves as students in discussion boards or in class settings. Some some correctional facilities forbid that discussion board type of environment. So how do we write that in there that institutions may seek to make it as similar as possible to the ones that they have on their campus, but or online that may have restrictions pushed back down from the correctional facility?

MS. MCARDLE: I see no other hands.

Oh, wait, sorry Stan just went up.

DR. ANDRISSE: I just wanted to add to what Kim and say that you know, that's certainly something to consider and as an example, a science course, you know, may a lab component of a science course may, you know, have things that cause, you know, issues to get into the correctional facility. Thus, you know, the "same or similar" becomes a little more challenging. To the turnover point that I had mentioned earlier, is it possible to think about, instead of turnover faculty to be thinking of that the credentials of the faculty are same or similar, even if there are, you know, different faculty in it. So, maybe something to consider in the language.

MS. MCARDLE: Aaron.

MR. WASHINGTON: Yeah, these are all great ideas and things that the Department can take back and discuss further and think through ways to either amend the language that we've presented here or, you know, think of ways in the future, that we can provide clarity. Again, whether that's in regulation or through subregulatory guidance. I want to make sure we have enough. I want to make sure everybody has been able to provide their thoughts on on each on each of them. I know we talked about Stan talked specifically about the

teacher experience credential and turnover. Any thoughts on the "transferability of credit for courses available to confined or incarcerated students?" Vanessa if you can scroll down just a bit. I think they one of the paragraphs. If anybody sees it stop me, , keep scrolling. Vanessa, please. One of there it goes, you can stop there. Number five, we say "offers transferability of credit to at least one institution of higher education in the state in which the correctional facility is located or in the case of a Federal Correctional Facility in the state in which most of the individuals confined are incarcerated in such facility will reside." And that was taken directly from the statute. And so while the Bureau of Prisons takes this into consideration in their determination, that this is the actual statutory framework for what is at least required, and then we're saying for the Bureau of Prisons determination, we want to have at least similar or the same or substantially similar offering so any any more any more ideas on that the I was just trying to point out the statute kind of talks about and the regs talk about transfer transferability of credit in two places. So any more ideas on transferability of credit, you can scroll back up Vanessa, I'm sorry, to the "best interest" piece. Thank you.

MS. MCARDLE: Belinda.

MS. WHEELER: Thank you, I'll just reiterate, but make it more specific to this particular one. This is a really important, you know, this is a really important guardrail. I think it will protect students against you know, potentially bad actors coming in with kind of junk credits or, you know, things like that. So I think it it kind of puts everyone on notice that, you know, these really need that educational institutions cannot work in a vacuum, and that they must have these transferability. So I think, again, this is just a really good guardrail that protects students because, you know, oftentimes they move, you know, both while incarcerated, and then just the general public on the outside. So this is, I think this is really valuable that this protection, this guardrail is put in for students so that they do have that because oftentimes, we've seen, you know, with other situations where students have had to come en masse to the government to help them out because their, their credits weren't able to be transferred. So I appreciate ED putting this putting this in. Thank you.

MS. MCARDLE: I don't see any other hands.

MR. WASHINGTON: And then for the last

one, you know, "offering relevant academic career services." Are there any ideas on language here? Or even if you have ideas about what should be in, you know, in subregulatory subregulatory guidance, if we release that to explain this further, any any of your thoughts or ideas will be welcomed.

MS. MCARDLE: I'm not seeing any hands.

MR. WASHINGTON: Okay, well, I with that, I think what we can do in the time remaining is move into temperature checks. I will say I'm not an expert at temperature checks. And we have okay, we have-

MS. MCARDLE: We have two comments, Belinda and then Stan.

MS. WHEELER: Quick question. Thank you very much. We had discussed recidivism and ED's desire to get a definition on that. You know, during the break, a lot of us had had a chance to, you know, talk and look at stuff and I was curious, do we have space now before we do the temperature checks to to visit that I don't want to derail us if we're going in this direction, but I just wanted to check on that, because, and then also, there was another issue about some concerns about the two year part of things. And, you know, I've talked with constituents and colleagues on the subcommittee, and

I just wanted to check whether or not there might be an opportunity to say something briefly about that. Thank you.

MR. WASHINGTON: Yeah, let's do it.

MS. MCARDLE: Stan.

MR. WASHINGTON: Oh, sorry, sorry
Sophia.

DR. ANDRISSE: I was gonna actually mention the same thing, and propose some ideas around recidivism. And in the two-year piece, as well. And so what a lot of there's a lot of different, as Dr. McTier was mentioning, there's a lot of different ways to look at it. And I think that's where his questioning came. One of the, you know, more commonly used ways of the definition is it's reincarceration within three years, as a result of a new conviction, or a technical violation. But what is, you know, what is being more commonly used amongst groups, like myself, that I represent, is removing that technical violation piece, and just saying, reincarceration, within three years, due to a new felony conviction, the technical violation piece is very problematic in that, you know, there are individuals that, you know, being a formerly incarcerated person myself, I can, you know, I had good POs, had good, had some parole officers that were very excited about me

being back in school, for instance, and working on my doctorate degree. And then I had some parole officers that were not very excited about that particular aspect of who I was, and that, you know, made things a little bit more challenging for me. So, you know, if we were to go off of technical violations alone, sometimes people just get the, you know, luck of the draw and get a parole officer, that is, you know, not working in their best interest per se. And, and they get it, you know, technical violation. So I would propose not to use technical , you know, re incarcerations due to technical violations, and simply added as reincarceration due to a new felony conviction. And I also just wanted to add, I don't think my question about the requiring recidivism as being used as the quality of the program was really addressed. And I know, you know, we intended I intend to send some language suggestions. But you know, it wasn't really responded to the, you know, what, what's your alls thoughts were on not using recidivism as a metric for quality. But since I mean, but tracking it, but not using it as a metric of quality of the program.

MS. MCARDLE: Aaron.

MR. WASHINGTON: Stan, I don't think a decision has been made there that we wanted to get the thoughts of the subcommittee. You, I think almost

everyone that has spoken has said it should not be considered in the quality of the program of the subcommittee members, and we will certainly take that back and discuss it. But we, but it was clear that the subcommittee in general, did not think that that would be a good indicator of quality of a program.

MS. MCARDLE: Belinda.

MS. WHEELER: Thank you. If we are able to chime in about the definition. I just wanted to say that I agree with Stanley, I think that the language should read that it is only for a new conviction, a new felony conviction rather, so that that whole idea of the technical is removed. Stanley did make a comment about like a three year thing. I was unaware of that. I just want to reiterate what I'd said earlier about that timeframe of actually tracking recidivism, I think that the maybe going like that five to seven might be more beneficial. So that might be an opportunity, perhaps that would not cause harm against the the people that we're trying to help here. So if that is technically something on the table, too, if a timeframe does need to be, you know, looked at, I wonder if you know that five to seven, again to give people the space to, you know, fully integrate and things of that nature but definitely taking, removing that that technical violation, I think

it must be a new felony conviction. Thank you.

MS. MCARDLE: I see no other hands.

MR. WASHINGTON: Belinda, I think you said you wanted to talk about one more thing outside of recidivism.

MS. WHEELER: Yeah, I was actually just gonna raise my hand and ask if that's okay. Yes, sir. Thank you. So there was a there was some concerns about I forget what number it was, it was number, it's about that two year for a program and it being kind of evaluated, I wanted to put an idea forward for ED's consideration. And it parallels what goes on in a lot of different spaces now. If an educational institution is told by their, their accreditation agency, that they are in violation, so I just use that as, as a kind of base point there, that there's usually an appeal process that is available to an institution, you know, to try to, you know, show cause and, you know, show look that we're actually really, really doing things incorrectly. And we're asking for a second glance, I wonder whether or not it would be important for ED to consider to have a process in place for colleges to appeal a decision that DOC might make about their program not offer operating in the best interest of students, it seems good, good for the appeal to be made to the Department of Education to

kind of be a status check on on to whether or not that college program meets that quality standard. So I wonder whether or not that kind of, you know, since we do seem to have a little bit of latitude on on how this language is written, that, you know, if there is indeed a case where it looks like an educational institution may not be serving the best interests as based by, you know, corrections or that other entity that's listed in the statutory language, whether or not there could be a possible appeal process there. I just put that for the Department's consideration. Thank you.

MS. MCARDLE: Aaron.

MR. WASHINGTON: Thank you. And I think that I had mentioned earlier that we will be talking about you know, standards, consequences, and appeals in the next session and I think that will probably end up, you know, devote a lot of times those those areas.

MS. MCARDLE: I see no other hands.

MR. WASHINGTON: Okay, so I think I think it's time to move on to temperature checks. I I'm gonna need Amy's help with this. Amy, is everybody on? I can only see and I don't so I can't see everybody to do the thumbs up thumbs down, sideways thumbs. So maybe Sophia, can you see everybody or?

MS. WILSON: Could everyone turn on their video?

MR. WASHINGTON: Just the subcommittee members?

MS. WILSON: Yes, just the subcommittee. Sorry.

MR. WASHINGTON: It might take us a few a few times to get this right. But if thumbs don't work then we can do we can just people can just raise their hands if they have issues with the language as proposed because I I can't see everybody on the screen from my view. But I know we do have Dr. Paccione on the line. I believe Dr. McTier was able, we resolved his technical issues, Amy?

MS. WILSON: Yes, we have everyone who should be here.

MR. WASHINGTON: Okay. Okay. I think the only person we don't have today for today is Terrell who told us he wouldn't be here. So Vanessa, would you mind scrolling all the way up to the top of the document? Thank you. So yeah, I can't see everybody so if so we'll do it this way. You can Sophia?

MS. MCARDLE: I can see 123456.

MR. WASHINGTON: Subcommittee.

MS. MCARDLE: And I think this is Ron

also on here. Yeah. So yes, I see six subcommittee members.

MR. WASHINGTON: Okay, great. So I'll rely on you to help us if we if there's any thumbs down and then if there's a thumbs down then we can manage it and Sophia can you call on an individual?

MS. MCARDLE: Absolutely.

MR. WASHINGTON: What the, and before we start I, I want to say it would be helpful for the Department if you if your thumbs down to provide either actual language that we can consider or if you don't have language, just the general concept, you know, if you if you don't like a regulation, and if we get like I don't like it, it will be, it will be difficult for us to, I guess go back and in our proposed regulation, it'll be difficult for us to go back and draft language around that or try and come to some compromise. So if you could provide like a framework on what you would like to see going forward in session two, that would be really, really helpful.

MS. MCARDLE: Belinda.

MS. WHEELER: Sorry, just a clarifying question. Because this is the first time I've gone through this process. If, for example, I was to do a thumbs up or a sideways, I just want to be clear, do I

still have the opportunity to potentially provide some additional or a different language after this temperature check has you know, because a lot of my stuff might be this [holds up sideways thumb] right now. But I am planning, you know, with the committee and the constituents to provide some other language so just want to make sure that if I'm doing this [thumbs up] or this [sideways thumb], that I'm not, I'm not locking myself out from offering ED more language with regards to this. I just wanted to clarify that please.

MR. WASHINGTON: That's absolutely correct. And, and Belinda, keep in mind that this is this is the subcommittee as well. So you know, this is the recommendation to the main committee. So it's, we're really not locking anything-- the main committee was raised of is the real is the entity that kind of locks it in for consensus, or no consensus, hopefully, consensus, but, but so yeah, so if you're saying that you that you like the lang that you'd like the language, you can still say, hey, I thought about it a little more. And I want to I do want to add something, if you're not really sure right now, and you can do the sideways if you're, if you're okay with the language, and then if you just if you just totally disagree, or then you can do the thumbs down and then and hopefully, with all anybody who does a

thumbs down, you can just briefly tell us why. Okay, okay, so for-

MS. MCARDLE: And just a reminder to put the thumbs close to the face so that we can actually see them.

MR. WASHINGTON: Alright, you ready? This is my first time doing a consensus check, so. I'm getting a message. I'm sorry. One second everybody, I just want to make sure that I'm doing this correct. Yeah, so this is just a status check of where we are. We don't want to diminish the role the subcommittee's role, and we do want your feedback. We have another full session next month, and we will continue all these conversations. So I hope that I hope that was clear. And what I said and in that reiterated in, in the guidance that I just received. So for 600.2, the definition of an additional location. What is this subcommittee feeling and this was adding the adding that you have to an additional location would be any of these facilities, even if the instruction was through, even if the instruction was through correspondence, correspondence or distance education. Do we have a thumb, do you want to do your thumbs or? Okay, Sophia has got it.

MS. MCARDLE: Okay, I can't see Marisa's. Okay, gotcha. Marisa. Yeah, there's no thumbs

down.

MR. WASHINGTON: Okay, alright. Okay, so let's move on to the confined or incarcerated individual. This was about mirroring the definition in regulation to the statute.

MS. MCARDLE: I'm sorry Aaron, Dr. McTier had a hand raised.

DR. MCTIER: Just for clarity purposes. We're also including the side notes that you've placed in the document, am I correct? As a part of what we're gauging temperature checks for? Or is it just the regular text?

MR. WASHINGTON: For now let's just do the regular text because if you are not and if you do a thumbs down because we haven't you know this, your Dr. McTier, your thumbs down can be because right now that language is not including there, we haven't had a chance to go back to talk to our colleagues and leaders about adding this or adding these pieces. So that would be a point where you could just do thumbs down and then state why.

DR. MCTIER: Gotcha. But then on my other one, I will put my my finger as sideways, the first one.

MR. WASHINGTON: Okay, thank you. So

I've got a temperature check on a confined or incarcerated individual. The definition mirroring that's the statute and also including juvenile justice justice facility in the definition.

MS. MCARDLE: Okay. There are two thumbs down. And I guess we'll start with, who should we start with?

MR. WASHINGTON: It's up to you, Sophia.

MS. MCARDLE: Let's go with Stan first and then go to Belinda.

DR. ANDRISSE: So I'm just acknowledging the comments, the additions by Terrell and Dr. McTier that are in the sidebar there.

MS. WHEELER: That's the same for me. I just want the acknowledgement of those bubbles. Thank you.

MR. WASHINGTON: Thank you. Okay, we can move down to 600.7. This is, Vanessa, if you can scroll down to like, I guess the first there's a lot of red in there, but just scroll down to the first piece of red. Yep. Okay, so we'll just take a temperature check on the whole 600.7. as a whole. This is codifying the process by which the Department will not grant the waiver to exceed 25% of students. If 25, if an institution has

more than 25% of their regular roles, because they're incarcerated, they can apply to the Department for a waiver and these are the conditions for which the Department will not approve a waiver or grant a waiver. And it also discusses it also, if you scroll down a little bit Vanessa, it also discusses if the waiver is approved, then the the circumstances under which we can withdraw the waiver and the wind and then how the institution would go about winding down if the waiver has been drawn. So can I see thumbs?

MS. MCARDLE: I'm still waiting, okay, there are no thumbs down at this point.

MR. WASHINGTON: Okay. Can we go to 600.10, Vanessa? Okay, so we didn't specifically talk about 600.10 like, just on this paper, but we did talk about it when we talked about the application that the school would make to the Department of Education under 668.8. So essentially, here we're just codifying a regulation that the Department's proposal that the first eligible prisoners, that the that the, the Department must, the Secretary must approve the first prison education program at the first two additional locations. So that's, that's what we're going to that's what we're adding. And we talked about that under the definition of 668.8 but we're proposing that the Secretary approve the

first prison education program at the first two additional locations. Sophia, do we have a hand up or?

MS. MCARDLE: I don't see any thumbs yet.

MR. WASHINGTON: I didn't know if we had a hand up.

MS. MCARDLE: But Dave has his hand up. So are we doing let's, let's do the thumbs first, and then we can get to go to Dave.

MR. MUSSER: I'm sorry, Sophia. Real quick, this was an explanation for why there's some text in here that people probably won't understand. Because we haven't really talked about it and it's unrelated. If you see C one, romanette three there, that's actually a technical change from a completely different part of the regulations that is going to happen regardless of what we do here. So you can ignore that. I think what you're giving a thumbs what you're giving thumbs for is the are the provisions elsewhere. And especially specifically in C one, romanette two. Sorry about that. Sorry for jumping in.

MS. MCARDLE: That's okay. So let's go ahead and do the thumbs now. We can look at them now then. Okay, and no thumbs down.

MR. WASHINGTON: Thank you, Sophia.

Vanessa, can you go to 600.21? This is in regard to reporting additional locations to the Department. So this is just updating application information. So updating your Participation Agreement with the Department to inform us within 10 days of the change that, that you've added another that you've added to eligible prison education program. We're not voting on Belinda's edit, Belinda's edit was the establishment of an eligible career, sorry, an eligible prison education program at an additional location as defined in 600.2. We are not voting on that, we are voting on the language as is there. So if your thumbs down, you can explain why. So, so show us your thumbs.

MS. MCARDLE: Okay, we have one thumb down. I can't see Angie and I cannot see Dr. McTier. Okay, I have one thumbs down. And that is from Kim.

MS. CARY: Just clarifying that Belinda's, Belinda's thing there? Otherwise, it'd be good.

MR. WASHINGTON: Thank you. I'm just writing as fast as I can. Alright? Vanessa, can we go to 668.8? We're going to, you know what, let's take this as a whole, let's take it as a whole, I know that there's a lot in there. But if you're a thumbs down, then you can just point out the section that you're that you will let

us know what section you're a thumbs down for. This is the definition of a prison education program. And then we can ask Vanessa to scroll to the area that you want to discuss. So you're, so Sophia will let us know who what order we should go in. And then-

MS. MCARDLE: We do have Stan Stanley asking a question, I believe.

MR. WASHINGTON: Okay.

DR. ANDRISSE: I think it's a lot to I mean, I'm a thumbs down. And I think it's a lot to go through. And I think we should try at least, you know, couple sections at a time, but not all as a whole.

MR. WASHINGTON: Okay, let's do that. Okay, Vanessa if you can scroll back up to the top. So in paragraph N, we've just provided that we've just added to the regulation, that the Department considers a prison education program as an eligible program.

DR. ANDRISSE: I mean, even if we just do what can be captured on the screen, that way, we could at least be refreshed of what we're discussing. And we can do couple at a time in that way.

MR. WASHINGTON: I guess what's captured on the screen is like some of them, you know, some sometimes we'll jump from like, or it might not the whole entire thought in the regulation might not be

captured on the screen. Like let's say you just see half of like what we're proposing for our accreditation or half of what we're proposing for the Department's approval? I think Stan, you had offered let's go section by section. So I think maybe we should, hopefully just do that. Okay. Alright. So how about N? Just this is a technical change, what I would consider a technical change. We're essentially saying that, you know, it is an eligible, a prison education program is an eligible program.

MS. MCARDLE: I have no thumbs down.

MR. WASHINGTON: Okay. Alright. Let's start with (o)1, (o)1 is a statutory change. That is saying that. That's only only I'm sorry, only public non profit or vocational institutions are eligible to provide a prison education program that is in the law. So we see that as technical. Thumbs?

MS. MCARDLE: I have no thumbs down.

MR. WASHINGTON: Okay. Vanessa, could you scroll down a little bit? Thank you. That so (o)2 is also directly from statute. The institution has to be approved by the BOP, DOC, or other entity to to operate in the correctional facility. The postsecondary institution has to be approved to operate in the correctional facility. This is a statutory this is

directly from the statute, no changes were made.

MS. MCARDLE: I have no thumbs down.

MR. WASHINGTON: Okay. (o)3. This was essentially out of the statute. But this is where this is essentially where we're saying that after two years of approval by the BOP or DOC, the postsecondary the the Bureau of Prisons would then have to begin evaluating programs or determining programs are in the best interest of student based on the definition that we're going to create here.

MS. MCARDLE: Stan had a hand up I'm not sure if you had a question, Stan.

DR. ANDRISSE: Yes, I I actually am a thumbs down for the one before actually.

MR. WASHINGTON: Stan, can you explain why?

DR. ANDRISSE: I think this is where I would like to propose the idea that there is a collective of stakeholders involved, if I if I'm recalling correctly.

MR. WASHINGTON: I believe that was the next one. I put Dr. McTier and Stan's comments. If you see the next paragraph 3(i), I put your comment there.

DR. ANDRISSE: Okay.

MR. WASHINGTON: Vanessa's highlighting it. I'm getting feedback. Give me one second, I'm sorry. Let's just vote on let's just vote on 3 altogether. As opposed to voting on 3 (i), 3 (ii) So essentially, we're saying after-- So let's vote on all 3. So after two years of approval under the so that essentially we're saying we will give them two years of approval initially. And then after that, the Department after that the Department Bureau of Prisons and Department of Corrections would have to apply our definition as we define it through the subcommittee to the program's continued approval to this institution continued continued approval to operate a program at a operated prison education program at a correctional facility.

MS. MCARDLE: I have two thumbs down so far, two thumbs down.

MR. WASHINGTON: Okay.

MS. MCARDLE: Let's start with Stan and then go to Dr. McTier. Stan, Stan. Yeah, I think you're on mute. Sorry.

DR. ANDRISSE: Sorry, I'm trying to read through what's on the screen, as well as looking at the document in another view. So I'm in the thumbs down, because what Dr. McTier and I mentioned in the sidebar

there. And I mean, looking back through it, I'm, you know, I'm also a thumbs down for for the for number two, because for the similar reason, it is number two is saying that it is the correction, I'm against the Department of Corrections being the gatekeeper to these programs. And that is what number 2 is saying. Correct? And am I reading that correctly?

MR. WASHINGTON: Yes, Stan, you're reading it correctly, that is-

DR. ANDRISSE: So I'm a thumbs down for that, I think. You know, I think that the collective of stakeholders should be involved at that approval stage, that gatekeeping stage.

MR. WASHINGTON: To reiterate, I just want to reiterate that the there is a weigh-in from the Department of Education, there's a weigh-in from the accreditor. There's also a weigh-in from the State. The Bureau of Prisons is is not the only entity that will that will have a say in whether a program can operate or whether a prison education program can be established at a correctional facility.

DR. ANDRISSE: So, yes, so the Department, the Secretary has the ability to say it won't happen. The accreditor has the ability to say it won't happen. And the Department of Corrections has an ability

to say that it won't happen. So I and what I'm suggesting is that the Department of, particularly for the Department of Correction piece, that there be a collection of stakeholders that advises the Department of Correction. So, you know, the way I'm looking at it as the Secretary of Education has a pretty good handle on education. The accrediting institutions and agencies that accredit education programs have a pretty good handle on Education. Department of Corrections do not have a handle, it is not their job to have a handle on education. So for that reason, I think that there should be a collective of stakeholders that is helping to advise the Department of Corrections in that decision process.

MS. MCARDLE: And should we go Dr. McTier, or do you want to respond Aaron?

MR. WASHINGTON: No, let's go to Dr. McTier, please.

MS. MCARDLE: Dr. McTier.

DR. MCTIER: I echo all the sentiments of Stanley Andrisse. I'm not a fan of the lack of students, formerly incarcerated students at the table. Surprised that, you know, the individual applying to establish this program is not at the table, I do think that they should also have a voice to explain or further articulate as to why they want to establish the program

beyond just the application phase. Right. So I just think there needs to be key stakeholders, and a representative from each constituency group at the table, as it relates to 2, I am not a fan of the recidivism rates being added on I just think some of these metrics are not-- our I think some of these metrics are problematic. I've stated that through throughout this subcommittee, I'm not going to go into too much detail. I understand that they're statutory. But just because they're statutory doesn't mean that I agree with them. I think there's just too many nuances that exist. I don't think the Department of Education understands what it's like to be incarcerated and then released from a prison facility. And I don't think that there's a lot of expertise from the Department of Education side, on what actually needs to be looked at. I just feel like we they completely missed the mark, in this particular area, so my thumb is down. I don't support it.

MS. MCARDLE: Stan?

DR. ANDRISSE: Yeah. So, you know, just to mention, again, that my thumb is down for both 2 and 3. And, you know, to touch on 2 again, and then also the comment on why it's down for 3 is, you know, I think we can still leave it as is and add in that stakeholder piece, where it's still the Department of Correction,

they're just being advised. I mean, when, you know, I had brought up, I had asked Aaron, like, what was the envision of how these new programs will be started? And you know, who is it-- the education institution that approaches the DOC? Or is it a DOC that approaches the education institution? I think, thinking about that is important. In most cases, I mean, I don't know, but I know for for the most part of my experiences, and knowing a lot about the different programs that are already in place. It wasn't the DOC that approached an education institution, it's it's an education institution, that ended up approaching a DOC for a partnership. And the DOC generally is like, you know, I don't know too much about this, like, please, you know, so there's there's multiple, multiple, multiple relationship building meetings around just getting the DOC to understand what you know how prison education program runs. If we if it is included in there, that there's already a body, an entity, an advising group of stakeholders present for the DOC to rely on, then the DOC can lean on that since the DOC is not, you know, it is not their responsibility to know all there is to know about education, but they could rely on this advisory committee of individual stakeholders and such to help them in making that decision.

MR. WASHINGTON: Thank you, Stan. I wanted to circle back to Dr. McTier. Are you are you now a thumbs down for paragraph two? I just wanted to make sure I get the tally. You said that you agree with Stan.

DR. MCTIER: I am sorry I was, Roman numeral two.

MR. WASHINGTON: The number 2, Vanessa, can you highlight that? Yeah.

DR. MCTIER: It's under 3. Are we talking about 3?

MR. WASHINGTON: Oh, I'm sorry, I thought you were just I thought you were saying because Stan had went back and said he's now a thumbs down for number 2, originally, he was not. And so I know you said you agree with everything Stan said about the Bureau of Prisons and not--in wanting to work collaborative, collaboratively or in partnership with other key stakeholders. I want to also say guests, guests have that ability to raise their hands, but they will not have the ability to speak. And so, if you're watching from the public, while you do have the ability to raise your hand, consequently, you don't have the ability to speak, I think I just saw hand raised from the public. But but so I just wanted to ensure Dr. McTier that you were-

DR. MCTIER: Well my thumb is down for

definitely for 2 because I do want that that partnership, piece added into that. And then for 3 Roman numeral 1 and 2, and then all those A,B,C,D I'm definitely down.

MR. WASHINGTON: Okay. A,B,C,D. So you're talking about the out, you're referring to, you're down, down down the outcomes?

DR. MCTIER: Well, that's what I thought we were on. Are we on? You? Are we on number 3 Roman numeral 1 and 2?

MR. WASHINGTON: We're on number 3 right now. And I apologize for being for being so confusing. But I just want to first I want to circle back to see what your if any of you were still sideways, thumbs for number 2, which you said, your thumbs down. And then for number 3, you said that you were thumbs down because of the recidivism at first. And then you said I'm also thumbs down because of A,B,C,D and so-

DR. MCTIER: Etc cetera. I'm not a fan, my thumb is down because for 3 specifically for 3. I've already explained why I'm thumbs down for the recidivism rates and all of those things. For 2 my my thumb was to the side, because you did say that it was statutory. But if I could put it down, I would with the caveat that you know, I do want to see that stakeholder piece added into both of these areas. But because it's a

statutory requirement, my my, my thumb is to the side with the I really want to put down.

MR. WASHINGTON: Oh, okay. I'd like to move to paragraph four. Sophie, well, let me know. Let me know when whenever we're ready.

MS. MCARDLE: Okay, so let's get everybody's thumbs then.

MR. WASHINGTON: Oh, do we have a four? Now let me see, did we skip four? There could be some technical, like issues with like the numbering in the document. Oh, if you could, let's see. Scroll down, Vanessa. Yeah, I think we skipped number four, you know what it was, if you can scroll back up Vanessa, to the Roman numeral four, I think you will that was originally the number four and we made it Roman numeral four. So this was let's this was that the going forward, the Bureau of Prisons will be required, we're proposing to require the Bureau of Prisons to make the determination going forward into the future 90 days before the expiration of the institution's program Participation Agreement. So that would essentially be about every six years, the Bureau of Prisons, State Department of Corrections, based on the definition that we create here will make that decision that the programs are operating in the best interest of students. Each each each, each

institution would have different expiration dates for their program Participation Agreement, but but essentially, a program participation agreement could last up to six years depending on if the institution is on provisional certification. That could that would be whatever the agreement was between the Department and that institution. But if but generally for many institutions, it would be every, every every six years the determination would need to be remade that the programs continue to operate in the best interest of students.

MS. MCARDLE: So are we ready to get a thumb?

MR. WASHINGTON: Oh, yeah, please, Sophia.

MS. MCARDLE: Let's see the thumbs then. Okay, I got-- see I can't see Angie's thumb. I'm sorry, doctor. Oh, thank you. I have no thumbs down.

MR. WASHINGTON: Okay. Alright. Vanessa, can we go to (o)5. This is transferability of credit. This was this mirrors the statute, one minor technical change, to update the CFR, the Code of Federal Regulation references. So we can do the temperature check, Sophia.

MS. MCARDLE: Okay. And I don't see

any thumbs down.

MR. WASHINGTON: (o)6, this was this was (o)6 was essentially from statute however, we we did add clarifying language, that it has to be a final accrediting action, that is an adverse action. So the institution would have to have exhausted all their appeals processes. And then the final action by their creditor was to revoke accreditation. So if any of these things happen, so if any of these things happen under six, you know it from the Department's perspective, from the creditors perspective, or the state's perspective, the postsecondary institution cannot offer a prison education program. We're not voting, we're not taking a temperature check on Belinda's proposed addition to cross reference to 6 (o)2. So if you are a thumbs down, Belinda, if even if your thumbs down, because that's not in there, you can just you know, let us know.

MS. MCARDLE: And I just want to check if Kim had a question or if this was in respect to the actual check.

MS. CARY: Question. I have a question really quick. Aaron, I believe it was yesterday I asked about the ability for school, an institution, to continue or start in a program if they were under program review. Would that be language that we would need to put here?

MR. WASHINGTON: You know, what, I, Vanessa, can you put that can you put that?

MS. CARY: Thank you, Aaron.

MR. WASHINGTON: Program Review underneath the underneath Belinda's comments. We'll have to take that back and talk about it. But that would be Dr. Paccione. Vanessa, you can write Dr. P, Dr. Paccione

MS. MCARDLE: I think this was Kim, right?

MR. WASHINGTON: Was that? Was that Kim? Or was that Dr. Paccione speaking?

MS. CARY: It was Kim. Thank you.

MR. WASHINGTON: Oh, sorry, Kim. I apologize.

MS. CARY: That's alright.

MS. MCARDLE: Sorry. I have another question from Stan.

DR. ANDRISSE: Yeah, I just wanted to it was not added in the document. My comment earlier on number 2 and the DOC being the gatekeeper, I would, if you wouldn't mind going back, I can give you the suggested language that I would like you to put there. So you know, even in regard to this being statutory that the DOC needs to be in that decision making capacity. I would like the language added, "with guidance from a

stakeholder advisory group."

MS. GOMEZ: So you want me to type exactly where you're saying right now? Okay.

DR. ANDRISSE: Yeah. So with with guidance from a stakeholder group, with guidance from a stakeholder advisory group, to include and essentially the same stakeholder groups that we've mentioned in the, that Dr. McTier mentioned in the bottom. You know, just two comments below.

MS. MCARDLE: Okay, so let's go back down then and do the thumb check. Please remember to put the thumbs close to your face so I can see them. Okay, I have at least two thumbs down. I can't see Dr. McTier and I cannot see Marisa. Dr. McTier has a question.

DR. MCTIER: Okay, we're back to what section again, I'm sorry. Okay, 6. Alright.

MS. MCARDLE: Shall we try again? Let's try again. Let's do that thumbs again. So again, I have thumbs down from Belinda, thumbs down from Stan. And I cannot see Marisa for some reason. Oh, there you are. And I cannot see Dr. McTier. Okay, it looks like okay, there's things blocking them. So we have two thumbs down. Let's start with Belinda this time.

MS. WHEELER: Yep, thank you. The only reason my finger my thumb is down is because of those two

bubbles. I want to make sure that those are acknowledged. I think it's really important to for potentially that program review that's so important with making sure that students are protected. And then just for clarity, that cross reference so just want to acknowledge those bubbles. Thank you.

MS. MCARDLE: Okay, and I'm not sure. Dr. McTier, did you have a question or? No, thumbs down. And the other thumb was I lost track myself. There was another thumb down that was, was that Kim or Stan?

MS. CARY: It was not Kim, but I would agree with my own comment there that I would want that included.

MS. MCARDLE: Okay.

DR. ANDRISSE: And that's why I had it down as well.

MS. MCARDLE: Okay.

MR. WASHINGTON: I heard that Dr. McTier had his thumb down.

MS. MCARDLE: No, no. Yeah
(inaudible).

MR. WASHINGTON: Yeah. Alright, Vanessa, we can move up. (o)7. This was about the initiated adverse action, so-

MS. MCARDLE: Can we just there's a

question from Dr. Paccione.

DR. PACCIONE: Yeah, I don't know if you can hear me. But can we is it safe is it safe to assume that all the comments that were made that are going to be included? Or should we be voting no, just to say we want to make sure that those comments are acknowledged? Can we just-- is it safe to assume that all of the comments that were made during the sessions are going to be addressed and it's not safe to okay, I thought alright, thank you guys.

MR. WASHINGTON: All of the comments that were made will be addressed whether the whether we adopt them or propose to adopt them or not and if we propose not to adopt them first of all this again, I this is a subcommittee recommendation, right? But we have to keep in mind the Department of Education does have a vote at the main table as well. Like Jennifer Hong can vote is on this package as well. But if I if we come back the next session, and then after discussions with leadership and colleagues, if there's rationale for why we really don't believe something should be included that will be provided to the subcommittee the subcommittee chooses to push forward with the recommendation like we want this included and this is what we want to present to the main committee then that's that's up to the subcommittee but

what I can do is provide the rationale behind why the Department doesn't think something maybe something should be included for example well I won't give example but but but I'm but we will provide rationale at least for why we don't think it should be included. Is that okay? And so that's why I want to vote on the language on the screen because we haven't had it and not the comment bubbles because we haven't had a chance to fully discuss everything in the comment bubbles just yet.

MS. MCARDLE: And also we have a hand up from Stan.

DR. ANDRISSE: Yeah I was I was just going to clarify what you just said so we're we are temperature checking our feeling on every-- what's not in the comment bubbles. But and then I also wanted to just clarify and add to my subcommittee members that you know what we finally decide is upon us and you know, for instance Dr. McTier's, strong suggestion against recidivism, we make that decision you know, not not Aaron for instance and the other Department of ED colleagues, am I correct on that? It is the subcommittee members that make the final piece that is that is brought to the sub that is brought to the full committee.

MR. WASHINGTON: That's correct. Okay, and I think with the thumbs down you-- people are

expressing why the thumb is down so I mean, you know, you're saying I'm gonna put my thumb down because you're gonna address my comment bubble. We we kind of the Department knows why your thumb is down. So number number 7 is the initiated adverse action piece. And that was about if there's an initiated adverse action, if the if the accreditor takes steps to initiate an adverse action, suspension, revocation, and Beth wants to jump in there with other items that the accreditor can do, if they take steps to initiate an adverse action, then the institution cannot begin a prison education program. And if there are already prisoner education programs active at a correctional facility/additional location, then there, they would have to submit a teach out plan to the to their to their accreditor. So your thumbs please?

MS. MCARDLE: And I cannot see Stan's or Dr.McTier's, if you can put them by your face. Okay.

DR. MCTIER: Can you repeat it? I'm sorry, I did get sidetracked.

MR. WASHINGTON: So this this paragraph was about initiated adverse actions. So if the if the if the accreditor takes steps to initiate some sort of adverse or negative action against the institution, such as terminating, suspending or revoking the accreditation or pre accreditation of the

institution, that institution would not be able to offer a prison education program. So if they apply to the Department got all our stuff together, we want to we want to provide a prison education program at X correctional facility, that will be it'll be denied they couldn't do it, because they had an initiated adverse action. And there's a process an appeal process that the institution can go to go through in order to resolve that initiated adverse action. And only at that point, could the could the institution offer a prison education program, and if the institution already offers prison education programs, they would have to create a teach out plan for that prison education program in order to have a plan for, for for in the unfortunate event, that the final accrediting action was adverse. And accreditation was revoked from institution and therefore, the students in that program can no longer receive Title IV aid.

MS. MCARDLE: Okay, no thumbs down then.

MR. WASHINGTON: Okay, let's go to paragraph 8. This paragraph is directly from the statute. And this is just saying if the program leads to licensure, or certification, that it would have to satisfy the applicable licensure requirement, like the applicable the applicable educational requirements in the

state, if it's a correctional facility other than a Federal Correctional Facility, and if it's a Federal Correctional Facility, in the state that most students will reside upon release. And we're not voting on the comment bubble. Kim had made the recommendation that the postsecondary institution would make that decision, but we're not voting on that comment bubble. We're just voting on language. This was this was directly from the statute.

MS. MCARDLE: Okay, I have one thumbs down. That's from Kim.

MS. CARY: Just to add the language for clarification.

MR. WASHINGTON: Okay. Paragraph 9. Paragraph received a lot of discussion yesterday. This was about not offering education to a student if their-

MS. MCARDLE: Just one moment, I Dr. McTier are you voting for the thumbs down in the prior or the now?

MS. MCARDLE: Now, okay. Go ahead, AaronAaron, I think you're on mute.

MR. WASHINGTON: It does not offer education that is designed to lead to licensure employment for a specific job or occupation. And the state of such job occupations typically involves

prohibition on licensure or employment to a formerly incarcerated student. And then to kind of have that nuance about if it's anything other than a state, Federal Correctional Facility in that state or if it's a Federal Correctional Facility in the state that that most of us will reside upon release. And Vanessa if you can scroll down a little bit, the Department has added go back up, just maybe we can try and get Roman romanette one. Yep. And the Department has added a little more clarifying language to say that, essentially, the school, the institution cannot enroll a student in a program, if there's any state law that bans, bars, or prohibits licensure or employment based on criminal conviction or a specific type of conviction. Then again, we had that nuance again, where if it's a State Correctional Facility in the state that the correctional facility is located in or if it's a Federal Correctional Facility, the state that most students would reside upon release, or individuals reside upon release. So can we get a thumb temperature check on that?

MS. MCARDLE: Okay, I have three thumbs down. Let's start with Dr. McTier.

DR. MCTIER: I just want to echo or acknowledge Terrell's comment in the bubble. But just really want to make sure that students have the agency to

decide on what type of education that they want to choose with the expectation and with the expectation that the institution makes them aware of, you know, potential barriers that may exist. But just to say that we can't offer degrees because of licensure. I don't agree with that.

MS. MCARDLE: Let's go to Stan. And then Belinda.

DR. ANDRISSE: Mine was the exact same.

MS. MCARDLE: Belinda.

MS. WHEELER: Thank you. This acknowledges I just wanted to acknowledge the bubble and how important that is. And I'm already working with constituents and colleagues on the subcommittee and we'll share with the subcommittee via email, some new language, which put some advocacy in there for both students that want to pursue a degree that currently is limited because of a statute and requiring, you know, educational partners to really kind of, you know, let's see if we can provide some opportunities for students with community partners and education to actually remove some of these statutory licensure restrictions right now. So there will be some new language coming in but also acknowledging the excellent beginnings that Stan and Dr. McTier have said

in this space. Thank you.

MS. MCARDLE: Kim.

MS. CARY: Just to clarify for Belinda a note, you and I have not talked off off camera but make sure you add in here about the how that connects back to placement rates. Thank you.

MR. WASHINGTON: Kim, were you a thumbs down or?

MS. CARY: No, I was not. I was sideways.

MS. MCARDLE: She had a question or a comment.

MR. WASHINGTON: I'm sorry, Sophia, I didn't-- somebody had a question?

MS. MCARDLE: No, no, that was Kim. Kim had a question. That was her. She was thumbs sideways. But then she had a comment.

MR. WASHINGTON: Alright. Okay, thank you, Sophia. Paragraph 10 is regarding accreditor accreditor requirements. So they'll evaluate the first prison education program at the first two additional locations. They will perform a site visit at those locations no later than one year after initiating the program. And they'll also review and approve the methodology behind the input indicators. We're not voting

on Belinda's comment bubble, and if there's a downvote then folks can explain.

MS. MCARDLE: I have 3. 1, 2, 3 down. Let's start with Belinda, then go to Kim, and then go to Stan.

MS. WHEELER: Thank you. Yes, this is just the acknowledgement of the on the bubble off to the side. And then I'm continuing to work with, you know, constituents, colleagues, as we kind of look to clarify this further and provide language to the subcommittee. Thank you.

MS. MCARDLE: Kim.

MS. CARY: Just acknowledgement of Belinda's comment.

MS. MCARDLE: And Stan.

DR. ANDRISSE: The same.

MR. WASHINGTON: Thank you all.

Paragraph 11 Vanessa. Paragraph 11 is is similar to the preceding paragraph. This is the Department's approval. We are also proposing to approve the first prison education program at the first two additional locations. After that, the prison education programs no longer have to be approved, but they do have to comply with various parts of the Code of Federal Regulations and 25% waiver. In some reporting things they are adding if certain types

of institutions are adding additional locations, they would have to get approval first if they're under a heightened cash monitoring, or other or provisional certification. And then also under paragraph 11 is the application process to the Secretary for the first program of the first two additional locations. I think there's a little more, Vanessa, can you scroll down? I think there's a little more. Yeah, this is okay. And so if the first two is the first prison education program at the first two additional locations is approved, romanette three is the process by which institutions would apply to have subsequent would report to the Department subsequent programs? By just letting us know that there's no the accreditor will let us know that there's no initiated the school will let us know that there's no initiated adverse action, there's no final adverse action within the last five years. And also that there's, the state has not moved to revoke its licensure, its state authorization in the last five years. So I'll pause there for temperature check or question.

MS. MCARDLE: On this, I believe a question from Kim, or a comment.

MS. CARY: A comment. Dr. McTier is this where on (E) reentry counseling was brought up earlier, and I don't see a bubble, or any comment out

there is is that needed? Or am I in the wrong section?

MR. WASHINGTON: If I can, but Vanessa, can you scroll out to B really quickly? Oh, yeah.

MS. CARY: E, sorry, E as in entry.

DR. MCTIER: Yes, I think this is what we were talking well. Yeah. Well, the conversation we had early this morning.

MS. CARY: Okay, does there need to be a bubble there to discuss? If I remember correctly, this was where we want to have more of a collaboration and not just put this on the institution or the DOC, we wanted to have third party entities involved, much like what you and Stan work with every day. Is that correct?

DR. ANDRISSE: (interposing) I'm sorry, go ahead Dr. McTier.

DR. MCTIER: Yeah, my stance was that for the academic institution, or the academic program, that is applying for applying to establish a program, not making this a like a requirement, but an option, just in case, you know, they don't have the necessary band manpower, or the bandwidth to carry out the reentry component. This seems like more of an expectation that they do that. And then I know a lot of educational programs, establish or want to provide educational

services and degrees, not the reentry component, because it's outside of their wheelhouse. So I just want to make sure that that is clear. I do think it's, I really want to go on record and say I think it's very important that reentry services are provided by those who know what they're doing. I just don't think that educational institutions and programs have the tools to do that part.

MS. CARY: Thank you. I was thinking this was where it was at. And sometimes you'd said also that maybe on the DOC side, they don't allow that that connection to happen sometimes. So I guess I just want to make sure that point was brought up since I didn't see a bullet there.

MS. MCARDLE: And also we have a comment from Stan.

DR. ANDRISSE: Yes, I would. You know, we plan, as Belinda has mentioned and as I have mentioned, to provide some language, but I also think that if you can add the bulleted or excuse me, the bubbled comment for Dr. McTier as well as my comment to this. You know, I also said that, similar to what he's what Dr. McTier just mentioned that reentry counseling is I think that it should be included. And it should be, you know, community based organizations that have expertise in providing those services.

MS. MCARDLE: Aaron, did you have a comment or are we ready for the temperature check?

MR. WASHINGTON: Yes, please, Sophia.

MS. MCARDLE: Okay, everybody thumbs to faces so we can see what you probably don't see is that your mute your mute num symbol, sometimes block your thumbs and I see 1,2,3,4. I can't see Marisa's. Five thumbs down. So let's just go from Belinda and then Kim, Dr. McTier, Stan, and Dr. Paccione.

MS. WHEELER: Thank you. It's just the acknowledgement of the bubble. Thank you very much.

MS. MCARDLE: Kim.

MS. CARY: Same, thank you.

MS. MCARDLE: Dr. McTier.

DR. MCTIER: Same.

MS. MCARDLE: Stan.

DR. ANDRISSE: And I also the same as well.

MS. MCARDLE: Dr. Paccione.

DR. PACCIONE: Same.

MR. WASHINGTON: Okay. Let's go to 12. Thank you, Vanessa.

DR. ANDRISSE: So I did have a question on that part. Is this the-- could you remind me what part that is in? Is that the metrics part? Or what

section is that in that would the reentry counseling.

MR. WASHINGTON: So this, that would be under 668.8 (o)11. And that would be the application that the postsecondary institution submits to the Department of Education for the first program at the first two additional location. So after you get your approval from the Bureau of Prisons, Department of Corrections, after you get your approval from the accreditor, then well, the postsecondary institution, and the postsecondary institution would then submit this information to the Department of Education.

DR. ANDRISSE: And are you running a program already at this phase?

MR. WASHINGTON: At this phase? You are not. You're submitting your application to start your first prison education program at your first additional location or your second additional location.

DR. ANDRISSE: So that that I mean, I that's what keeps throwing me off with the additional location piece. I I'm thinking of it as an additional prison education location, but it's an additional location just to the educational institution, the additional location of the prison.

MR. WASHINGTON: Additional location to the yeah, it's a postsecondary institution.

DR. ANDRISSE: But it is a first prison education program for the institution.

MR. WASHINGTON: Correct.

DR. ANDRISSE : Thank you for the clarification.

MR. WASHINGTON: Yeah, maybe we can clarify that more in the regulations as well, but I we did note five, five thumbs down. Okay, the (o)12 is the report. Instead of instead of codifying every every data element in regulation, we thought it would be best to codify it in the Federal Register annual Federal Register. It's published by the Secretary. And that would provide that data items that we want to collect and an explanation of the process of how institutions would submit those to us.

MS. MCARDLE: And let's see the thumbs. The only one I don't see is Stan's. Okay, no thumbs down. Thank you.

MR. WASHINGTON: Okay. (o)13. This is this paragraph is the circumstances under which the Secretary can withdraw approval of a postsecondary institution to offer a prison education program. We're not voting on comment bubble. We're only voting on the language on the screen. I mean, sorry, the red line language.

MS. MCARDLE: And let's see our thumbs. Okay, I have three thumbs down. Let's start with Dr. Paccione this time then, Kim, then Belinda.

DR. PACCIONE: Yeah, I'll go with the comment bubble. This needs to be a teach out process.

MS. MCARDLE: Kim.

MS. CARY: Absolutely with the bubble, we can't have it without that.

MS. MCARDLE: Belinda.

MS. WHEELER: Yes, thank you, the bubble. We must have students protected and a teach out plan will protect them. Thank you so much.

MS. MCARDLE: Thank you.

MR. WASHINGTON: Okay, we have completed the definition of a prison education program. Vanessa, can you scroll back up a little bit? To (p) right there. That's perfect. Thank you. This paragraph is about winding down of eligible programs that are not prison education programs at institutions that are not federal or state penal institutions that are currently offering programming to to students that are incarcerated in anything other than a federal or state penal institution, or Correctional Facility, the statute says penal institution but Correctional Facility, so we're proposing to allow for either six years after July 1,

2023, until the individual student reaches the maximum timeframe for their program completion, or the individual student reaches has exhausted their Pell eligibility under the Pell eligibility rules. And then we're also proposing Vanessa, if you can scroll down a little bit. I believe we're also proposing that for programs that do not transition there, for institutions that do not transition their programs, they're eligible programs to prison education programs, they cannot enroll new students after July 1, 2023, because they would no longer be in compliance with the with the statute.

MS. MCARDLE: We do have a hand up from Dr. McTier? I'm not sure if it's a question or a comment.

DR. MCTIER: Well, both for clarity purposes. So you just mentioned six years that a student is eligible for Pell. I'm just thinking about students who are taking one credit or one course that might exceed that six years. So are you saying that the student has, their Pell Grant will end after six years? Is that how I'm understanding this?

MR. WASHINGTON: Well, we're saying that the the institution can continue offering the the eligible program for an eligible program for six years after July 1, 2023. I think, I think I saw David's hand.

I think David Musser will weigh in, if that's okay Sophia.

MS. MCARDLE: Of course. Yes, David.

MR. MUSSER: Sure. I just wanted to clarify a little bit about how that Pell Grant lifetime eligibility works in practice. Each student when they file a FAFSA, and they're determined to be eligible for a Pell Grant is awarded what we call a scheduled award, which is essentially 100% of the student's eligibility for the year. But there are a lot of things that can reduce that eligibility. One of those is if the student is enrolled less than full time, so if they're enrolled in just one class, for example, they'll typically receive only one quarter of the Pell grant that they would otherwise have received. And so then they'll only have used 25% of their lifetime eligibility for that period as opposed to one or 100%. So when you get to that, we do it on a percentage basis such that when a student reaches 600%, essentially six full years of full awards, that's when they're cut off. So if they were less than half time only taking one course then they would only accumulate 25% every single year, which means they could go 10, 15, 20 years and before they reach that limit. So that's how that would play out in this context as well.

DR. MCTIER: Thank you for that

clarification.

MS. MCARDLE: Okay, so should we take our or do you have anything else to add Aaron or should we go ahead and with our temperature check? Let us do our thumbs. Okay. Stan, which is it?

DR. ANDRISSE: I guess I'm this way [sideways thumb] I have questions about this one, but yeah, I guess I'm-

MS. MCARDLE: Okay. So no thumbs down then.

MR. WASHINGTON: Okay, let's go to 668.32. This got a lot of discussion. This is amending the student eligibility portion of the regulations to say that says a student is for eligibility purposes for Pell Grant, the student is not incarcerated and if the student is incarcerated is enrolled in a eligible prison education program as we propose to define it with the Department would see this as a technical change.

MS. MCARDLE: Shall we get our thumbs ready to go? I can see. I cannot see, Stan. Alright, I have three thumbs down. Let's start with Kim. And then we'll move to Dr. McTier and Stan.

MS. CARY: Just acknowledging Aaron's update on the comment to match the description or definition of a question, the definition of the student.

MS. MCARDLE: Dr. McTier.

DR. MCTIER: Same, but just also acknowledging that the confined and incarcerated there's some level of nuance and a level of ambiguity that exists with those as it relates to the population as a whole.

MS. MCARDLE: And Stan.

DR. ANDRISSE: Same as Dr. McTier.

MS. MCARDLE: Okay. Thank you.

MR. WASHINGTON: Let's go to 43.

Vanessa, these are the disclosures. I forgot to mention the Department is open to hearing ideas. We only have 20 minutes left. But if there's proposals for more disclosures, adding more disclosures for students, we're also open to that as well. But the two, the two disclosures we have here are relating back to the statutory language on ensuring if a program leads to licensure, that it meets all educational requirements. And also if it's if there's any prohibitions on employment or licensure, that that students are aware so. So these are the these are the disclosures that we propose.

MS. MCARDLE: I have a hand up from Dr. McTier.

DR. MCTIER: So this proposal is that the institute the higher education institution, or the

specific higher education program provide this information to whomever?

MR. WASHINGTON: Belinda, do you mind if I answer Belinda? Okay, it looks like we're saying an institution that offers a eligible prison education program, the institution will provide this information to this student.

MS. MCARDLE: We have Belinda. And then we also have Kim.

MS. WHEELER: Thank you. My challenge with this is the first two words after the Roman numeral, one that I, "upon request", I believe that the whole idea of you know this, the population that we're trying to serve them having to with technical challenges, all sorts of challenges, needing to reach out to an institution to ask these questions is is very difficult. So I would like to advocate if it's possible, the removal of "on request" that this material is just made available to all students and they shouldn't have to request it. Thanks.

MR. WASHINGTON: Sofia. How many? I'm sorry, I didn't hear how many thumbs down do we have?

MS. MCARDLE: We didn't we didn't have a vote yet. Okay, so we had people who were questioning or commenting before the vote, so not yet. And we have still Kim, who was in the queue to comment.

MS. CARY: Thank you. I was thinking about this one a lot yesterday and for conversations, and I agree with Belinda, that the "upon request" is a little daunting. Not only from the students perspective, but also from the institutional perspective. If you know, someone says, Well, I want to know how every state you know, reads their professional license or what's required in every state. We don't necessarily have readily available information to us, we can certainly find it. But maybe we add a bubble in here that it's in collaboration with accreditation agencies, that you're allowed to gather that information, or they make that readily available to, you know, some source where we can go to gather that information, easily. Thank you.

MS. MCARDLE: So there are three additional hands up. We have Dr. Paccione, we have Dr. McTier and we have Stan.

DR. PACCIONE: Thank you. I agree with what Belinda and Kim said the removing the "upon request" and adding a bubble to this section I think is really critical.

MS. MCARDLE: Dr. McTier.

DR. MCTIER: Maybe we should say, the request is for those who are offering licensure programs, because I don't want to get into the point of where, say,

like a program like mine, we offer liberal arts degrees and, we don't offer the licensure component, will we be required to provide that information? If a student requested, I think we should put that caveat in there that if the program is offering licensure, then that request can be made, but if not, then yeah.

MS. MCARDLE: Stan.

DR. ANDRISSE: I think this was a part that I had mentioned, again, the adding of language around a advisory group of stakeholders being created. And there being language added here. So I mean, if we can add a bubble that says, and really what I'm referring to, you know, I will go back to my constituency with this and see where appropriately, it can have its own bubble or you know, its own language. And then that way, you know, in parts like this, it can say, refer back to this particular section, where, you know, there needs, you know, best practices show that having this third party group or entity of stakeholder that represent, you know, several different groups within, you know, you know, stakeholder groups, advising on things such as this would be the helpful then it takes, you know, as Dr. McTier mentioned, it's it would be difficult for the higher education institution to to make this request. But if there is this kind of advisory group that is putting out

best practices, they could assist and something of this nature.

MS. MCARDLE: Aaron.

MR. WASHINGTON: I hear I, Stan I got, I hear I heard a request for comment bubble, I heard a few requests for comment bubbles, because we have 12 minutes left, I have written down all of the requests. And I know we have note takers at the Department. And it sounds too if we could take a temperature check because I think 1,2,3,4 or 5, we have at least five thumbs down. And we'll you know, we'll definitely take all those ideas back with just for time sake, maybe asking Vanessa to add all those comment bubbles now maybe we still have to vote on one more thing, I think. Okay, is that okay with you Sophia?

MS. MCARDLE: Sure.

MR. WASHINGTON: Let's move to 690.92 This one was about the credit balance issue this week, we consider this a technical change. If the if the Pell award exceeds cost of attendance, it is required by statute to reduce it.

MS. MCARDLE: And shall we have our vote? I cannot see Dr. McTier. Okay, no thumbs down.

MR. WASHINGTON: Okay, we've gotten through it, I, I want to just you know, thank first of

all, I just want to thank everybody for all of the feedback. We will use all this information that you provided us to come back when you language and we encourage you all to submit any language suggestions, as soon as you can so we can incorporate them. The Department is going to start immediately back you know going back at the you know the drawing, trying to craft new amendatory language for you to discussing your changes so the fact the faster you can get it to us, the better. I think we meet again on November 8th through the 10th so if you could get it to us before then that would be so helpful so we can incorporate it or if we think that it wouldn't be beneficial to incorporate language we can provide you with a rationale. Stan has mentioned that this is the subcommittee's recommendation if you choose to continue to go for what that's the the main committee that is your that is your decision. But but I think we have some hands up we definitely have 10 more minutes so we can keep discussing.

MS. MCARDLE: We have Stan is next.

DR. ANDRISSE: Yeah, I just wanted to bring up to the subcommittee the the report out that will be at the November full committee meeting. So maybe take some time to talk about that before we close here.

MR. WASHINGTON: Stan, you're taking

my job. I forgot all about that. Yeah, you're making me look bad. But the yeah, so I had mentioned that the report out will be in December, there, there, there will need to be a report out in November as well. But the main committee, we have to wait to see when that will be. So it might be, you know, pretty quick turnaround for you all were, but I will make sure to keep in contact with the subcommittee to let them let you all know, when that will be, it's will be like a higher level workbook report out if the main committee does have if we if I go back later. And you know, my colleagues or leaders determine that we need something in writing to the to the main committee for the November meeting. I'm here to assist in helping to write things I know a lot of everybody has jobs. So, you know, this is one of my main tasks. So here at the Department so I will I can assist. If, you know, two days before we find out we need a 10-page report in writing, you know, but generally for the November session, we would like somebody to volunteer to provide an overview of what we discussed here during the subcommittee, and, and that that date is to be determined, the length of time is to be determined, but I will absolutely keep you apprised of, when we get more concrete information.

MS. MCARDLE: Kim.

MS. CARY: Thank you. I just wanted to let you all know that as a financial aid administrator, I did my best to bring issues to the table that were in the issue paper. And I appreciate ED's opportunity to allow my constituencies to come together and work with NASFA to present feedback that can be thought out, I know, it's been a huge concern of financial aid administrators that the same student eligibility requirements are in place for all students. And this particular group has its own challenges that we need to address and try to remove as many barriers as possible. So I don't know if David's still on here not, but return of funds, all the changes, we've seen that that I forgot to mention that one as a, an issue that I hope ED looks at, and will certainly be bringing that through NASFA to their attention. I don't think NASFA's minding me talk to talking on their behalf in that way. That you know, it's sometimes it's not in the students. They don't have the choice of being transferred to another institution. And we don't want that to be a negative aspect for them and stop their education. So I'll do my best. If you have any questions, please feel free to reach out and ask them. Thank you all.

MS. MCARDLE: And we have Stan, and then Dr. McTier with comments, Stan.

DR. ANDRISSE: So I just wanted to point out that I know so you know, being on the full committee, several of the negotiators had mentioned wanting to bring to the full committee changing the order of the topics. So prison education came last. I know there's a number of negotiators that were interested in bringing it closer to the front for this round, so it doesn't so it receives more attention or time potentially than it did this past time. So I know that that's something that the negotiators several had thought about proposing to changing the time and adding more time to it. So in that regard, it may come first or may come near the beginning of the week, instead of at the end of the week, like it did last time. Additionally, I was going to suggest that, you know, maybe we provide the amended language as whatever it is that we come up with by that time. And then the report out be really, for us to speak to the nuanced parts that there wasn't quite agreement on. And that can be a way that it is presented to the full committee.

MS. MCARDLE: Dr. McTier.

DR. MCTIER: I agree with Stanley wholeheartedly, I do think that, you know, this is a new program that's being established. And so I think it needs the level of attention, as do student loans and whatnot,

because, listen, I have my student loans, and I definitely want that addressed too. But I do think, you know, I'm here for my students and the students that I serve and I want them to receive as much attention. So if we can get it pushed to the forefront instead of at the end of the week, because it did feel completely rushed to where we couldn't really dive deep into the necessary issues. And it seemed as if the main committee was really interested in hammering out some of these details. That's point one. Point two is a request if we can get all the document with all of the bubbles, and all of the texts sent out to the committee members so that way, we can have it fresh on our minds. I know we've been, some of us are traveling and doing things, I'm sitting in front of my prison getting ready to go speak to my students, so I don't have my computer and I wasn't able to take notes, so it'll just be helpful to have that information. Thank you.

MS. MCARDLE: Aaron.

MR. WASHINGTON: I'll send out a document with the bubbles right after this. Right after we conclude.

MS. MCARDLE: Belinda.

MS. WHEELER: Thank you. So just wanted to double check with the subcommittee and then

Aaron with regards to the reporting out and getting documents in that ready for the main committee members just want to check with the subcommittee. Is everyone comfortable with you know, Stan and myself working on those documents to to bring them back to the main committee? I know, it was kind of addressed super quickly, you know, on Monday, Monday afternoon, and I just wanted to make sure that, you know, we hear from the subcommittee members, and you know, I don't think it needs to be a thumb check. But I just want to make sure that, you know, that was what we'd kind of left the, the conversation with, and I know it was mentioned earlier this morning, when we started, you know, Stanley's name and my own being offered up, but I just wanted to double check that that is, you know, full transparency, and everyone is okay with that, or if there are other considerations that need to be made. Thank you.

MS. MCARDLE: Dr. McTier.

DR. MCTIER: I'm okay with that, speaking for myself, but I will ask that if you know, I'm sure we're all working together. But just to keep that transparency, the document and the talking points be submitted to the group, and to Aaron, and the Department of ED. So that way, we are all kept abreast of what's going on, that'd be greatly appreciated.

MS. MCARDLE: Aaron.

MR. WASHINGTON: Oh, yeah, we will. We've heard your comments. And I don't know, Sophia, if you had any statements that you'd like to make? Or?

MS. MCARDLE: I would just like to thank everybody for their participation and all the wonderful information that we've been provided with. Thank you.

MR. WASHINGTON: Yeah. And we can look at the we can look at the order of the, of the order of topics at the main committee, and we didn't intend to rush, but we knew we knew that the subcommittee, would be discussing the details. So yeah. I think that's I think we're I think that's it. Again, thank you all like I thank you all for providing your time to the Department. And I'm definitely working on behalf of, you know, students and affected students. And I think we've had really a really great discussion this week, and so much feedback and information to take back in process and we're ready for round. Get ready for round two. We have two minutes left. I don't want to rush anybody out the door.

MS. MCARDLE: We do have one comment from Stan.

DR. ANDRISSE: Oh, I just wanted to

say it's been a pleasure being here with you all. And I've really enjoyed the conversation and an honor to have been, you know, accepted to be at this table. Very important stuff that we're discussing here. And it's just been a pleasure being here with you all.

MR. WASHINGTON: Agreed. No, I don't want, we have 20 seconds left. We're like we're like running down the clock. I don't want to end before 3:00. I don't I don't want to get an email saying you didn't-- you had to go till 3:00. That's what we said in our in our, you know, guidance. So we got five seconds left. So thank you all again, and have a wonderful. Oh, we have one more comment.

MS. MCARDLE: Kim. Kim will do it.

MR. WASHINGTON: Kim will take us out.

MS. CARY: Aaron, I just wanted to say thank you for leading us down this path. Thank you very much.

MR. WASHINGTON: Thank you. Alright, well, you all have a wonderful rest of your day.

DR. ANDRISSE: Bye everyone. Take care. Get some rest.



