



January 4, 2016

The Honorable John King
Acting Secretary
Department of Education
400 Maryland Ave., SW
Washington, DC 20202

Dear Mr. Secretary:

On behalf of the millions of students enrolled in postsecondary career education, and the schools who serve them, I am writing to extend our very best wishes to you upon your new leadership responsibilities leading the U.S. Department of Education.

A New Year, and new leadership at the Department, brings opportunities for new beginnings. My hope is that together we can begin an era of constructive collaboration that never forgets our common mission in serving the students enrolled in our sector's schools. Unfortunately, the past six years have been marked by an era of ideological confrontation where nobody wins – especially the students.

We are at a unique moment in time. The legislative, regulatory and legal battles of the past six years have defined both the Department and the sector. Unfortunately, the net result of these confrontations has been less access for students most in need; fewer occupational skills; and as a result, fewer jobs with real wages and a real chance for a place in America's middle class.

We are also at a very different time. The sector that existed when President Obama took office is very different today. At that time, enrollment was growing disproportionately because of the economic dislocation coupled with open enrollment at most schools. Looking back, many of those students were neither academically nor personally prepared to complete their studies resulting in drop-out rates and default rates unacceptable to anyone.

Today, we are dramatically smaller serving 562,000 fewer students in 2013/14 than 2009/10. Yet, we have heard the call for a focus on outcomes being more important than access. Despite our dramatic drop in student enrollment, we produced 20,000 more academic awards in 2013/14 than we did at the height of the recession!

We are providing a very different product. Today, this sector is focused upon providing career skills in areas of growing demand, often projected skill shortages. Unless the sector is supported in this effort, students will miss access and opportunities for real careers while employers will be unable to meet their need for skilled workers.

We are no longer of one corporate structure. Many of the larger private sector schools are engaged in online delivery of liberal arts education. Many community colleges are increasingly focused on articulation agreements with four-year liberal arts programs. Those providing career education today include schools from all sectors in ways that no single corporate structure can continue to define the sector.

As we begin 2016, our mutual focus will be working with the House and Senate Education Committees to reauthorize the Higher Education Act. While we must engage in constructive deliberations, my hope is that we can also build a new era of constructive collaboration in advancing postsecondary career education in the broader sense. Accordingly we request that under your leadership we might jointly commit to 2016 as a year when:

1. We begin open, honest and constructive conversations about how we might work together for the common good. We seek an opportunity to sit down with you as soon as possible to begin such conversations. We invite you to engage in conversations with our schools at our Annual Hill Day, March 15 and 16 here in Washington; or our Annual Convention, June 5 -7 in Orlando, Florida.
2. We ask for your leadership in changing the Department's communications related to our schools. Unfortunately, there is a growing history of the Department attacking the entire sector rather than individual schools. There are good and bad performers in every sector of higher education. Do not accuse any group of schools when addressing the Department's concerns regarding a specific school.
3. We ask that you ensure a fair enforcement of the Department's policies across all sectors of higher education rather than continuing an ideological attack on our entire sector. As you know, the academic fraud in some Division One Athletic programs far exceeds any allegation against our sector schools. Other sectors of higher education have performance outcomes that are often below those of schools in our sector. All we seek is the implementation of one set of standards for all schools.
4. We ask that you take appropriate steps to protect the independence and integrity of the accreditation process. There are real concerns that the Department is pressuring accreditors to pursue an ideological agenda of selective investigation and enforcement actions against schools in our sector that are not similarly directed towards other sectors. As you know, the accreditors in our sector are being attacked for insufficient action while the same Department has protected a community college from actions by their accrediting agency.
5. We ask you to lift up the importance of postsecondary career education. This is increasingly the forgotten element of postsecondary education today. Yet it is the bridge to opportunity for so many of today's citizens; and the key component for our nation's ability to compete in a global economy. The government's own research is now projecting shortages of trained professionals in many of the careers we teach.

6. We ask you to recognize that even if one believes in the premise of Gainful Employment regulations, the implementation of this regulation by the Department is inadequate. The National Association of Student Financial Aid Administrators – a highly-respected and independent voice – has eloquently articulated these problems. Too many Department memorandums have been published after the due dates for schools to submit data. Schools should have full access to all the metrics used in assessing their programs so that they can be assured the determinations are accurate, and fair.

As a veteran of many years in our federal government, I can say that “When it comes to the work of government, perception is reality. There is a real perception that the current government is embarked upon a war on our sector and our schools unlike anything ever before directed at any sector of higher education.” As much as I am a fan of all sectors of higher education, I believe that no sector could survive the level of investigations and attacks that have been directed to our schools in recent years.

Unless we find ways for the Department and our sector to work together, new traditional students will be the real losers. They will find less access, less opportunity, less academic awards -- and most important, fewer chances at pursuing their bridge to their version of the American Dream.

We need a new era of mutual, respectful, collaborative and constructive conversations between our government and this sector. Today, there are 3.2 million students enrolled in our schools seeking the career education and skills that enable them to pursue a place in America’s Middle Class. Our students deserve no more, no less than any other sector’s students. They deserve to attend schools treated with the same operational, transparency, and outcome metrics of every other school.

My 22 years in elective office and all my years of indirect service in or with government are reflected by a deep commitment to work across political and ideological lines to build compromise and partnerships that advance the common good. I personally, and on behalf of our sector, stand ready to advance a similar level of constructive cooperation with you and the Department. Our hope is that you will begin this journey with us as you assume the leadership of the Department of Education.

Sincerely,

A handwritten signature in black ink, appearing to read "Steve Gunderson". The signature is fluid and cursive, with a long horizontal stroke at the end.

Steve Gunderson
President & CEO