



The leader in online court reporting education!

June 30, 2017

The Honorable Betsy DeVos
Secretary
U.S. Department of Education
400 Maryland Ave, SW
Washington, D.C. 20202

Dear Secretary DeVos:

In accordance with the Gainful Employment (GE) regulations, the College of Court Reporting is submitting this Alternative Earnings Appeal to correct the reported final Debt-to-Earnings rates published earlier this year for the following:

Institution's name: College of Court Reporting
6-digit OPEID: 026158
Program name: Court Reporting
CIP Code: 22.0303
Credential Level: Associates Degree

The College of Court Reporting is basing this appeal on earnings information obtained directly from graduates in a survey of their annual earnings. The graduate earnings survey significantly improved the Court Reporting program's D/E rates from fail to either zone (annual income) or pass (discretionary income). The College of Court Reporting submitted a Notice of Intent to appeal on January 23, 2017, which was within 14 days after the publication of the final Debt-to-Earnings (D/E) rates. This appeal includes:

- Mean and median graduate earnings from the graduate earnings survey using the same graduate cohort that the Department used;
- Revised D/E Ratios based on annual and discretionary incomes; and
- Required supporting documentation.

The College of Court Reporting conducted an employment and earnings survey of its graduates by following the guidelines provided within the Department's *Best Practices Guide - Recent Graduates Employment and Earnings Survey*. Both the mean and median earnings reported by the graduates were significantly higher than the \$28,364 Debt-to-Earnings Annual Rate Denominator reported in the Gainful Employment Debt-to-Earnings (D/E) Rates. The graduate



earnings survey results in comparison to the reported in the Gainful Employment Debt-to-Earnings (D/E) Rates were as follows:

Median SSA Earnings Amount	Mean SSA Earnings Amount
\$24,678.00	\$28,364.00
Median CCR RGEES Earnings Amount	Mean CCR RGEES Earnings Amount
\$36,000.00	\$34,091.00

The graduate earnings provided from the survey significantly improved the graduate earnings rates. The median annual earnings reported by College of Court Reporting graduates was higher than the mean annual earnings reported; therefore, the median annual earnings was used to calculate The Annual Earnings Rates as instructed in the following IFAP document:

<https://ifap.ed.gov/GainfulEmploymentOperationsManual/attachments/05ExplanationOfDebtMeasures2015.pdf>.

The use of the Median CCR Graduate Earnings Amount as the Debt-to-Earnings Annual Rate Denominator yielded the following results:

- The Debt-to-Earnings Annual Rate was reduced from 12.47 percent (fail) to an actual Debt-to-Earnings Annual Rate of 9.83 percent (zone).

The Debt-to-Earnings Discretionary Income Rate Denominator was based on the formula: Debt-to-Earnings Annual Rate Denominator - \$17,655. This value was reported as \$10,709 by the Department. Using the Median CCR Graduate Earnings Amount, yielded the following:

- Change of the Debt-to-Earnings Discretionary Income Rate Denominator from \$10,709 to \$18,345.
- Correcting the calculation of the Debt-to-Earnings Discretionary Income Rate, improved this rate from 33.03 percent (fail) to 19.29 percent (pass).

Since the actual Debt-to-Earnings Annual Rate of 9.83 percent was in the zone and the The Debt-to-Earnings Discretionary Income Rate of 19.29 percent was a pass, the College of Court Reporting met the Gainful Employment requirements. As such, the College of Court Reporting respectfully requests that you approve its appeal.

The College of Court Reporting is including the following documentation to support its request for you to approve the appeal:

1. A certification signed by the institution's chief executive officer attesting that the survey was conducted in accordance with the Standards for Conducting the Recent Graduates Employment and Earnings Survey and that the mean or median earnings used to recalculate the debt-to-earnings ratios was accurately determined from the survey results;
2. An examination-level attestation engagement report prepared by an independent public accountant or independent governmental auditor, as appropriate, that the survey was conducted in accordance with the requirements set forth in the Standards for Conducting the Recent Graduates Employment and Earnings Survey. The attestation must be conducted in accordance with the attestation standards contained in the Government Accountability Office's Government Auditing Standards promulgated by the Comptroller General of the United States (available at www.gao.gov/yellowbook/overview or its successor site), and with procedures for attestations contained in guides developed by and available from the Department of Education's Office of Inspector General (See <http://www2.ed.gov/about/offices/list/oig/nonfed/sfgd2000.pdf> and <http://www2.ed.gov/about/offices/list/oig/nonfed/sfa.html>);
3. Supporting documentation requested by the Secretary:
 - a. Survey responses (password: GE2017Appeal)
 - b. Non-response Bias Analysis (provided but received 80.65 response rate)
 - c. Narrative of Survey Plan

Thank you in advance for your time and your immediate attention to the College of Court Reporting's Alternative Earnings Appeal to correct the reported final Debt-to-Earnings rates published earlier this year.

Please contact me at 219-531-6128 or jay.vettickal@ccr.edu if you have any questions or need additional information.

Respectfully,

Jay T. Vettickal
Executive Director