

HOUSE BILL 49 TESTIMONY

Presented by: Christopher Eckels, President
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Mr. Chairman, members of the Higher Education Subcommittee, my name is Chris Eckels, Founder and Managing Partner of Cyanna Education Services and I thank you for this opportunity to present testimony concerning House Bill 49.

Cyanna Education Services is an Ohio based information technology and consulting company that provides services to private and public schools, associations, and government entities across the country. For the past 16 years we have assisted organizations develop IT solutions in an effort to increase the efficiency of their operations. For the past 10 years Cyanna has been working with multiple state education oversight agencies including Ohio, Georgia, Kansas, Missouri, North Dakota, Minnesota, along with national accrediting agencies, to transform their paper review and approval process into fully online web based solutions that provide increased efficiency for both the state agencies and the schools that the agencies oversee. Cyanna has been working the State Board of Career Colleges and Schools since 2009, assisting the Board in its efforts to move its paper review and reporting requirements into an online interactive format.

I am testifying today to express concern about statutory language in House Bill 49 that was inserted in the House of Representatives that would prevent the State Board of Career College and Schools' from implementing the Board's student disclosure requirements that provide important information and disclosures to students prior to their enrollment in a career college or school. In particular, I am referencing lines 43827-43830 of HB 49 as well as the temporary language in lines 128303-128309.

This statutory change will effectively eliminate a process that has been in development and implementation for over two years. During this two year time period, Cyanna has worked with the State Board of Career College and Schools' and the Ohio Association of Career Colleges and Schools to create a solution that would provide a more effective means to disseminate important student enrollment information and disclosures that had previously been provided to students via a paper form that had been required by administrative rule since 2006. The new solution was technologically driven, provided over the web and was a short 5 minute graphic display of all the information required to be given to students, availing them of their rights and obligations.

Another key feature of the new enhanced online disclosures also allowed for the collection of student contact information so that the Board would have the ability to solicit and survey students directly about school quality. In addition, access to the student contact information would give the Board the ability to quickly assist students in the event of a school closure or other significant event.

Cyanna has worked with the Board and the Association to implement new requirements over the past year wherein the short disclosure video was tested and shared with schools and students. A \$25 fee per student was also discussed and approved, with schools allowed to pass on the fee to students through their enrollment agreement, though the majority of schools are simply paying the modest fee. All of the requirements including the fee changes were incorporated into administrative rules and reviewed and discussed during the administrative rule review process. I've attached to my testimony a summary provided by the State Board of Career Colleges and Schools of the lengthy process that resulted in the implementation of this new requirement.

The statutory language inserted by the House would prevent the State Board of Career Colleges and Schools from implementing the student disclosure requirement that is beneficial to students and provides the Board with valuable tools to assess school quality and assist students. For these reasons I ask that the higher education subcommittee consider the removal of the statutory language in lines 43827-43830 of HB 49 as well as the temporary language in lines 128303-128309.

Thank you for your consideration. I would be happy to answer any questions that you might have.



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Summary of Implementation Process for Student Disclosure Course Requirements

The online student disclosure course and possible changes to the way the State Board of Career Colleges and Schools (SBCCS) collects fee revenue were initially discussed by SBCCS in July 2014 as part of a number of proposed changes to the Board's administrative rules. Further discussions on the disclosure course requirement and the proposed rule changes took place with the Ohio Association of Career Colleges and Schools (OACCS) and their board of directors in the fall of 2014 and several suggestions submitted by OACCS member schools were incorporated into the proposed rule changes including the suggestion that the schools be permitted to assess any cost associated with student disclosure course fee directly to students through the school's enrollment agreement. The initial proposed changes to the administrative rules were approved by SBCCS in December 2014.

Subsequent discussions between SBCCS and OACCS about the proposed rule changes and implementation of the disclosure course requirement and changes to SBCCS' fee structure took place between January 2015 through May 2015. In June 2015, in accordance with the procedures outlined in Governor's Common Sense Initiative, notice was provided to all schools in regards to the proposed rule changes that were posted on the SBCCS web site and schools were requested to submit any comments on the rules by July 31, 2015. No comments were received on the proposed rule changes. The proposed rule changes were then filed with the Joint Committee on Agency Rule Review (JCARR) in August 2015 and a public hearing notice was sent to schools informing them that there would be a public hearing on the rules on September 30, 2015. The public hearing was held on September 30, 2015 and no adverse comments or testimony was presented on the rules changes. JCARR jurisdiction ended on October 30, 2015. On November 23, 2015 the final rule changes were approved by SBCCS and an effective date was set of January 4, 2016.

Beginning in January 2016, SBCCS informed schools about the new rule changes and that SBCCS would be developing the online student disclosure course video and anticipated that schools could begin incorporating the requirement into their admissions process in July, 2016. In March, 2016 SBCCS adopted a resolution setting the fee for the disclosure course requirement at \$25 and further stating that voluntary administration of the online disclosure course would take place between July-December, 2016 and that the requirement to administer the course during the admissions process would go into effect in January, 2017. Beginning in April, 2016, testing of the course took place with schools. In May, 2016 the online disclosure course video was posted on the SBCCS web site. In June, 2016 the disclosure course video was shown to schools at the OACCS spring workshop and the new rule requirements were discussed. In November, 2016 the disclosure course video and the registration process for students and schools was again presented to schools at the OACCS Annual Meeting and Workshop. In January, 2017 notice was again sent to schools about the new requirement and that schools needed to incorporate the new requirement into their admissions process and that it was SBCCS' expectation that all schools would be administering the student disclosure course video to incoming students by March 31, 2017.