

## **AACS GRC Continues to Implement State Authorization Plan**

AACS continues to work directly with senior Department of Education officials to protect the student financial aid eligibility of your students and schools as States and the U.S. Department of Education work to implement the Program Integrity State Authorization regulations. While we respect and appreciate the growing concern and confusion surrounding this issue, we ask that you enable us to remain your voice on this very important issue, and that you direct your concerns and inquiries to us and not to your state entities and/or U.S. Department of Education officials. AACS has received assurances from the Department that they are willing to work with us on a systematic review of each State's process and we have a plan in place to act upon the guidance we receive as quickly as possible. ([Read More](#))

At the heart of AACS' fully implemented and on-going plan is the coordinated efforts of both the AACS State Relations and Government Relations Committees to establish a singular point of contact and narrow line of communication between our membership, the state authorizing entity, and the U.S. Department of Education which promotes needed discussions and definitive information on whether or not – under the Department of Education's interpretation of the regulations - the state authorizing entity meets the regulatory requirements and, if not, what action the State must take to bring itself into compliance.

These lines of communication are proving to be very effective and are enabling us to gain the greatest amount of information as timely as possible and take the appropriate next steps to work back through the narrowly focused points of contact.

As previously noted, AACS has received assurances that the Department is committed to working through the review of all of the state policies and are systematically doing so. They recognize that this will take a considerable amount of time given the individual review necessary for each state authorizing entities' guiding documents. To date, the Department has already provided us with their analysis of a number of states, and there are more in process at this time.

Initially AACS was the only organization who had established the line of communication and this review process with the Department, but in light of the growing awareness of changes in Departmental interpretation – and the potential risks associated with States' failure to comply with the regulations – Department staff have acknowledged that the reviews the Department is undertaking includes our submissions, but that the Department is also reviewing state authorizing guidelines for many other forms of approving agencies as well.

It is very apparent that the Department is overwhelmed at this point, but they are now committed to methodically going through the reviews and evaluations on a case-by-case, state-by-state authorizing entity basis. This will most certainly take time and is only the first step in a process to then share that information with the State, determine what course of action is necessary, and devise a plan to address the concerns once they are known.

We collectively have a long road ahead, but your AACS State Relations and Government Relations Committees will continue to take the lead on this issue for your students and schools and share the information we receive with you through directed state-specific communiques and/or a soon to be

published state-by-state tracking system we hope to have on the aacsaction website ([www.aacsaction.org](http://www.aacsaction.org)) by next Monday.