

## Gainful Employment

vhacademy.edu

Date: July 15, 2019

The Department of Education (ED) rescinded all gainful employment (GE) regulations in final rules and authorized early implementation, at schools' discretion.

Accordingly, VH Academy policy is to implement the rescission early. This decision was made collectively by the school officials listed below.

VH Academy CEO

VH Academy CFO

VH Academy Financial Aid Director

Documentation: Neither the July 1, 2019 Federal Register Notice nor the June 28, 2019 GE Electronic Announcement #122 specify how a school must document its decision to implement early the rescission of the GE rules. How you document the decision is up to the institution. NASFAA would suggest documenting in your school's policies and procedures manual its decision whether to proceed with early implementation.

If that decision is made by a campus committee or an individual office, the committee or office could document its deliberations and its decision using meeting minutes or notes. NASFAA has learned that some schools are maintaining as documentation the internal memos or notifications that are sent to other campus offices, notifying them of the institution's decision to implement the GE rescission earlier than July 1, 2020.