

May 8th, 2025

Respected House and Senate Committee Members,

I want to bring forth several concerns with HF2431 as it pertains to the Private Career School Act:

- If 136A:82 CITATION is approved and updated by both House and Senate today:
 - “At the minimum, the definition of vocational should emphasize “**skills for employment**” within it to truly justify its meaning and limit its criteria.”
- With the current changes proposed, if any entity does not choose to be on ETPL, does that entity automatically fall outside the “Private Career School Act” thus **subject to no paperwork for even an exemption?**
 - With the current definitions as well as the changes proposed, an entity that offers post-secondary training will still have to file an exemption paperwork with the regulatory body
- There are too many additional terms listed under this act that do not have definitions thus leading to **significant differences in interpretation** from an entity versus the regulatory body. Hence, I recommend that following minimum changes
 - Subd. 9. **Program.** "Program" means any course or grouping of courses that is advertised or listed in a private career school's person's catalog, brochures, electronic display, or other publications, or for which the private career school person grants a formal recognition. A certificate of completion is not a formal recognition.
 - Subd. 25. **“Formal Recognition”** means a credential or award that is issued upon completion of a course, or courses, of instruction below an associate degree level, which represents measurable academic or vocational achievement and is intended to have standalone labor-market value. Formal recognition does not include certificates of completion, certificates of participation, or other forms of recognition that signify completion of a course, or courses, of instruction.

I am confident that this committee will address the above-mentioned matters to its fullest extent during this session.

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