



DAVID Y. IGE
GOVERNOR

JOSH GREEN
LT. GOVERNOR

**STATE OF HAWAII
OFFICE OF THE DIRECTOR
DEPARTMENT OF COMMERCE AND CONSUMER AFFAIRS**

335 MERCHANT STREET, ROOM 310
P.O. BOX 541
HONOLULU, HAWAII 96809
Phone Number: 586-2850
Fax Number: 586-2856
cca.hawaii.gov

CATHERINE P. AWAKUNI COLÓN
DIRECTOR

JO ANN M. UCHIDA TAKEUCHI
DEPUTY DIRECTOR

Testimony of the Department of Commerce and Consumer Affairs

**Before the
Senate Committee on Higher Education
Tuesday, March 23, 2021
3:00 p.m.**

**On the following measure:
H.B. 389, H.D. 1, RELATING TO POST-SECONDARY EDUCATION**

WRITTEN TESTIMONY ONLY

Chair Kim and Members of the Committee:

My name is Stephen H. Levins, and I am the Executive Director of the Department of Commerce and Consumer Affairs' (Department) Office of Consumer Protection (OCP). The Department supports this bill.

The purpose of this bill is to require accredited and non-accredited post-secondary educational institutions that are for-profit entities authorized by the Hawaii Post-Secondary Education Authorization Program to disclose, in print and electronic media and signage, that they are for-profit businesses.

The OCP supports H.D. 1 in the interest of consumer protection. The OCP enforces Hawaii Revised Statutes chapter 446E.

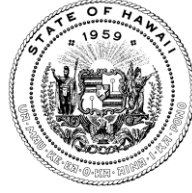
For-profit schools are significantly different from non-profit schools. For-profit schools are a business, and many of them are traded on major stock exchanges or owned by private equity firms. The owners and shareholders expect these schools to

turn a profit, and put simply, programs that don't justify their existence will be cut so that the schools can focus on courses that generate profitable tuition fees.

In recent years, numerous for-profit schools have engaged in unfair or deceptive trade practices, including misrepresentations involving accreditation, selectivity, graduation rates, placement rates, transferability of credit, financial aid, veterans' benefits, and licensure requirements. In response, many states, including Hawaii, have initiated enforcement actions to protect their students. Recent examples involve the alleged misconduct of Corinthian Colleges, Inc. and the Education Management Corporation.

Given the myriad problems associated with these schools, it is important to disclose to prospective students the schools' for-profit status. Requiring for-profit schools operating in Hawaii to provide the conspicuous disclosures proposed by this bill would protect consumers. At the very least, these disclosures would enable Hawaii students to be fully aware of a school's for-profit status when considering enrollment.

Thank you for the opportunity to testify on this bill.



DAVID Y. IGE
GOVERNOR

JOSH GREEN
LT. GOVERNOR

**STATE OF HAWAII
OFFICE OF THE DIRECTOR
DEPARTMENT OF COMMERCE AND CONSUMER AFFAIRS**

335 MERCHANT STREET, ROOM 310
P.O. BOX 541
HONOLULU, HAWAII 96809
Phone Number: 586-2850
Fax Number: 586-2856
cca.hawaii.gov

CATHERINE P. AWAKUNI COLÓN
DIRECTOR

JO ANN M. UCHIDA TAKEUCHI
DEPUTY DIRECTOR

Testimony of the Department of Commerce and Consumer Affairs

**Before the
Senate Committee on Higher Education
Tuesday, March 23, 2021
3:00 p.m.
Via Videoconference**

**On the following measure:
H.B. 389, H.D. 1, RELATING TO POST-SECONDARY EDUCATION**

Chair Kim and Members of the Committee:

My name is Bobbi Lum-Mew, and I am the Program Administrator of the Department of Commerce and Consumer Affairs' (Department) Hawaii Post-Secondary Education Authorization Program (HPEAP). The Department supports this bill.

The purpose of H.D. 1 is to require accredited and non-accredited post-secondary educational institutions that are for-profit entities authorized by the Hawaii Post-Secondary Education Authorization Program to disclose, in print and electronic media and signage, that they are for-profit businesses.

HPEAP supports H.D. 1 in the interest of consumer protection and appreciates how H.D. 1 ties the disclosure requirement to HPEAP authorization to ensure that the program has regulatory authority to enforce this provision.

HPEAP authorizes accredited, degree-granting post-secondary institutions under Hawaii Revised Statutes chapter 305J. Experience has shown that HPEAP may not receive complaints from students or otherwise be made aware of serious problems until

the institution is in the process of closing. These disclosures would provide for-profit status information to Hawaii students before they enroll.

Regarding unaccredited degree-granting institutions, HPEAP receives inquiries from past and prospective students regarding certain unaccredited degree-granting institutions. The Department appreciates the effort to make these students fully aware of the for-profit status of these schools.

Thank you for the opportunity to testify on this bill.



Hawaii Medical College

Written Testimony to the House Committee on Finance

To: Chair Luke, Vice-Chair Cullen, and Members of the Committee

RE: HB 389, HD1 RELATING TO POST SECONDARY EDUCATION

Date: March 20, 2021

My name is Jonathan Padua and I am a current instructor at Hawaii Medical College. I have been an employee of the institution since 2014, and prior to joining HMC I have nearly a decade of experience of teaching in post-secondary institutions across the country, both private as well as public. Currently I am also a third-year law student at the University of San Diego, with intentions of becoming a public interest advocate for consumer safety in the medical profession.

While the HB 389 has the noble goal of warning the public against predatory post-secondary institutions, the proposed legislation is overbroad in that it extends to both non-accredited institutions and accredited institutions like HMC. For many years, I have witnessed and participated in the constant due diligence HMC does to maintain their accreditation, from maintaining accurate financial records to accounting for education quality in every class offered. It is a rigorous and thorough process and HMC takes genuine pride in consistently maintaining that accreditation and providing quality education and training to our students.

HMC's record of successful job placement is a testament to that. Our students have been gainfully employed in individual practices, clinics and hospitals across the state and, furthermore, many have moved further up the management ladder in their respective workplaces. Personally, I have been treated by former students and it is astounding to see the profound change in confidence and professionalism an education can provide.

To subject an accredited for-profit institution to the same regulation as non-accredited institution would send the message to the public that there is no distinction of quality between the two. It would diminish the significance of being an accredited institution. And though HMC is a for-profit institution, unlike many for-profits, HMC is wholly locally owned and the vast majority of employees are permanent residents of Hawaii. It is a local institution providing essential training and jobs to the local community. And while HB 389 has good intentions, as it stands now, the legislation will do more harm than good to the population it seeks to protect. Thank you for your time.

Sincerely,

Jonathan Padua

Instructor, Hawaii Medical College



**Testimony to the Senate Committee on Higher Education
Tuesday, March 23, 2021 at 3:00 P.M.
Via Videoconference**

RE: HB 389, HD 1, RELATING TO POST-SECONDARY EDUCATION

Chair Kim, Vice-Chair Kidani, and Members of the Committee:

The Chamber of Commerce Hawaii ("The Chamber") **raises concerns** on HB 389, HD 1 which requires accredited and non-accredited for-profit post-secondary educational institutions that are authorized in the State to disclose in print and electronic media and signage that they are for-profit businesses.

The Chamber is Hawaii's leading statewide business advocacy organization, representing about 2,000+ businesses. Approximately 80% of our members are small businesses with less than 20 employees. As the "Voice of Business" in Hawaii, the organization works on behalf of members and the entire business community to improve the state's economic climate and to foster positive action on issues of common concern.

In this digital age of online reviews and complaints, many consumers already engage in due diligence and take into consideration educational facility, value, curriculum, and other factors that guide them into a post-secondary education. Classifying a Hawaii post-secondary educational institution solely on tax status would unfairly disassociate one group bases on that status and would add unnecessary compliance burdens placed only upon for-profit educational institutions while not-for-profit educational institutions would not.

Specifically, the disclosure requirement, imposed solely on for-profit educational institutions, that all catalogs, promotional materials, electronic media, and signage shall be changed will only increase the financial burden that does not necessarily augment greater protection for consumers. If consumer protection is truly the goal of this measure, the disclosure requirement should be centered as a collective for all educational institutions and not simply base on one tax status group.

While we understand the intent of this measure, this bill unfairly places educational institutions with a certain tax status at a perceived disadvantage even though two educational institutions could have almost identical value and curriculum.

Thank you for this opportunity to provide testimony.



Written Testimony to the Senate Committee on Higher Education

To: Chair Kim, Vice Chair Kidani, and Members of the Committee
RE: HB389, HD1 RELATING TO POST SECONDARY EDUCATION
Date: March 23, 2021

My name is Ashton Cudjoe, and I am the President & CEO of Hawaii Medical College. We were founded in 2007 and have graduated thousands of students whose lives were fundamentally changed for the better. We aim to improve the lives of our students, by showing them that they can succeed. I am troubled by the consideration of Bill HB389 as it does not take into consideration the contributions that locally owned colleges like ours make in the community.

This assumption is made obvious by the following statement within Section 1. "...for-profit institutions, first and foremost, are concerned with earning a profit, and not supporting education as a means of achieving a student's goal and gainful employment."

This statement leads me to believe that the intent of the bill is to harm for-profit institutions, regardless of outcomes, as opposed to protecting students. What matters are outcomes, and this is where energy must be focused. I am very comfortable when all institutions are held accountable using the same standards. Placing additional burdens on accredited institutions, especially requirements that have no direct effect on outcomes seems counterproductive and punitive in nature. This bill will only harm our institution, due to the increased costs required to adhere to the regulation as well as by inflating a narrative that our institutional outcomes contradict.

Hawaii Medical College grew stronger as federal rules focused on accountability were enforced, and our continued growth validates the educational advantages we provide our students. We offer quality education coupled with employment placement assistance. In the last three years alone, we've helped to place over 500 students into allied health careers in Hawaii as Medical Assistants, Billers and Coders and Pharmacy Technicians. On a side note, there's a strong likelihood that the medical assistant at your doctor's office is one of our graduates. We are proud of this and continually strive to improve and help as many students as we can.

Hawaii Medical College is a small local business intent on serving the community as best as we can. This bill is incredibly disheartening because we started the school to help ensure that students are never taken advantage of. All the owners live here in Hawaii and call these islands our home. I passionately oppose Bill HB389.

Respectfully,

A handwritten signature in black ink, appearing to read "Ashton Cudjoe".

Ashton Cudjoe
President & CEO



University of Phoenix®

To: Senate Committee on Higher Education
From: University of Phoenix
Re: HB 389 HD1 – Relating to Post-Secondary Education
Date: March 23, 2021; 3:00 p.m.

Chair Kim, Vice Chair Kidani and members of the committee,

For the record, my name is Annie Macapagal and I am here on behalf of University of Phoenix to express our concerns with HB 389 HD1. The University of Phoenix has been a member of the community in Hawaii for over 27 years. The University also offers quality online programs for those students who may choose not to attend an on-ground institution.

HB 389 HD1 discriminates against institutions based on tax status.

We are concerned that the bill treats similarly situated colleges and university differently based solely on tax status. We understand that this measure seeks to prevent potential students from being misled by requiring tax paying institutions to clearly disclose in all catalogs, promotional materials, electronic media, signage, and contracts for instruction that the institution is a for-profit business. However, we believe that such a disclosure would not lead to additional protections for students, but rather cause confusion. Private post-secondary institutions are held to the same standards for authorization by the Hawaii Post-Secondary Education Authorization Program. This bill would create a distinction between similarly situated institutions based solely on a fact that is meaningless for the purpose of authorizing institutions to offer education in Hawaii. The bill also contains overly broad language lumping all tax paying institutions negatively together based solely on tax status.

University of Phoenix has a long history of providing high quality career relevant higher education to working adults in Hawaii. Currently, there are over 640 Hawaii residents attending the University either at a local location or online; additionally, we have approximately 110 faculty members from Hawaii. It seems the intent of this legislation is to favor some institutions over others based simply on an institution's tax status, rather than concerning itself with real protections for students attending all colleges and universities in Hawaii. University of Phoenix, as a private institution whose tax status is for-profit, strives to provide high quality and accessible educational programs for all Hawaii residents who might not otherwise be able to access higher education.

In conclusion, University of Phoenix believes that HB 389 HD1 does little to create meaningful or value-added benefits for students in Hawaii, but attempts only to single out for differential treatment institutions solely based on their tax status.

For these reasons we are respectfully submitting testimony in opposition to this measure and ask that you hold the bill in committee. Mahalo for your consideration.



International Quantum University for Integrative Medicine
735 Bishop St., Suite 200
Honolulu, HI 96813
Tel : (877) 888-8970
Fax: (818) 864-3388

March 22, 2021

Letter In Opposition to HB389: Relating to Post-Secondary Education,

Chair Senator Donna Mercado Kim, Vice Chair Senator Michelle N. Kidani, and the rest of the honored committee, I appreciate this opportunity to speak with you. The following is our testimony, which we offer in order to show opposition to HB389 HD1.

My name is Dr. Paul Drouin, and I am the president of the International Quantum University for Integrative Medicine, also known as Quantum University. We are an unaccredited degree-granting institution (UGDI) based here in Honolulu, Hawaii, since 2007. We offer degrees to professionals who want to add Natural and Integrative Medicine to their current practices.

We are registered as a for-profit corporation in the State of Hawaii, have a transparent enrollment process, disclose our non-accreditation status in compliance with HRS 446E, and by statute are barred from accepting any Title IV federal and state funding.

Quantum University also employs ten staff members in the State of Hawaii. We are a small business that pays our taxes and contributes to the State of Hawaii. In addition, we host on-site events, including our annual Graduation Ceremony, which employ many local vendors and bring students and their families to the tourism industry of Hawaii.



Quantum University's Congress & Graduation Event 2017 at Aloha Tower in Honolulu, HI

We are a 'for-profit' organization, but that does not in any way diminish the high standards we represent, the quality of the education we provide, or the level of satisfaction that our students consistently report. The degree programs we offer prepare students for a fulfilling career in the field of health and wellness upon graduation. We offer unique programs that benefit students in Hawaii and throughout the world who otherwise would not have access to this education.

We are very concerned about HB389 since it makes broad assumptions about tax-paying institutions and contains overly-broad language that negatively groups together all "for-profit" institutions based solely on their tax status. These assumptions are simply not true in our case.

For example, this legislation states that "some for-profit post-secondary educational institutions have engaged in serious improprieties, causing the federal government to take action to mitigate the impact of their behavior." We do not deny this to be true for some for-profit institutions in the past. However, Quantum University has been in operation in Hawaii since 2007, and we have never received a complaint through the DCCA or the Hawaii Post-Secondary Education Authorization Program (HPEAP).

Contrary to the testimonies given in support of this bill, we are not a large company from the mainland. Quantum University is a small family-owned business located at 735 Bishop Street in Downtown Honolulu. We are not listed on the stock exchange, nor are we responsible to any stockholders or owned by any private equity firms. We are accountable only to our staff, students, and graduates. We are a mission-based company whose sole purpose is to educate, not to make a profit. We are proof that many of the assumptions made in this bill cannot be applied to all tax-paying educational institutions.

HB389 also states that "Ninety per cent of all students in these types of institutions take out loans to pay for their education." This is also inaccurate since Unaccredited Degree Granting Institutions (UGDIs) such as Quantum University do not qualify for student loans or student aid because we are "unaccredited."

HB389 discriminates against all UGDIs simply by looking at our tax status without understanding all the facts about our industry. Simply put, this bill says that all "for-profit" institutions are guilty by association, based solely on the fact that we have the same tax status, regardless of whether we have engaged in any wrongdoing. We simply ask that you preserve an open mind and respect the long-standing pillar of the American legal system that we should be considered innocent until proven guilty. Right now, this bill does the opposite, considering us guilty without any evidence of wrongdoing.

More importantly, previous state investigations of UGDIs in the State of Hawaii concluded that new regulation was not warranted as existing laws provide sufficient consumer protection. An extensive report in 2014 from the Office of the Auditor for the State of Hawaii, established that Chapter 446E of the Hawaii Revised Statutes provides sufficient consumer protection.

In January of 2014, upon request by the State Legislature, the **Office of the Auditor published an extensive report titled "[Sunrise Analysis: Regulation of Unaccredited Degree-Granting Institutions](#)" (Link)** which was presented to the Governor and the Legislature of the State of Hawaii. Their findings were as follows:

"We found that existing laws provide sufficient consumer protection against potential abuses by unaccredited degree-granting institutions in Hawai'i. Specifically, the purpose of Chapter 446E, HRS, is indeed consumer welfare; and the Office of Consumer Protection is already charged with, and has been rigorous in, enforcing the existing law. We also found that all states, including Hawai'i, have laws addressing unaccredited institutions and that online entities are already covered by existing law."

The State of Hawaii currently has effective legislation which regulates UGDIs. Chapter 446E, HRS, was enacted in 1979 to protect consumers, serve the public interest, and regulate unaccredited degree-granting institutions. It was amended in 1999, increasing consumer safeguards. Supporters of the amendments, which included the Department of Commerce and Consumer Affairs (DCCA), the Chamber of Commerce of Hawai'i, and accredited and unaccredited institutions, urged their passage as a way to increase consumer protections.

The report concluded that **“The current law regulating unaccredited degree granting institutions, Chapter 446E, HRS, does what it is designed to do; that is, it addresses potential problems stemming from solicitations that fail to adequately disclose a school’s unaccredited status. [...] In that regard, the current statute fulfills the traditional consumer protection framework.”**

The Sunrise report also found the cost of regulation would be prohibitive, at nearly twice the fees for accredited institutions. **Therefore, including UGDIs in HB389 would be going against the recommendation of the Office of the Auditor of the State of Hawaii. There is already effective legislation in place, and there is no evidence of wrongdoing by these institutions.** The testimonies submitted by the DCCA state that "HPEAP receives inquiries from past and prospective students regarding certain unaccredited degree-granting institutions. Therefore, UGDI only receives "inquiries," meaning that from data set forth in this report and the other testimonies, there have been no complaints against any UGDIs since 2011, only inquiries about the schools. Therefore the proposed legislation does not reflect a true picture of this problem in Hawaii. **If no complaints exist and the auditor’s office concluded that additional legislation was not required, UGDIs should not be included in HB389 bill at all.**

According to our understanding, there are four (4) for-profit accredited schools and, to our knowledge, no more than six (6) unaccredited institutions still in operation in Hawaii. According to another testimony, seven (7) for-profit schools had to close or leave the state. **Since UGDIs have not received any complaints during the last ten (10) years, our opinion is that the scale of this problem is not as large as is depicted in the assumptions made by the legislature in HB389.** In addition, we are not aware of any active or pending problems that would qualify as evidence of such wrongdoing by any for-profit schools in Hawaii.

The auditor’s report also demonstrates that, in fact, very few complaints are received from unaccredited degree-granting institutions (UDGIs) in Hawaii and that the existing laws have been very successful at preventing improprieties, providing safeguards, and protecting the public welfare.

In our case, many of these assumptions are not factual, nor are we aware of any claims or evidence that prove such assumptions to be valid. This bill simply labels us as guilty without any due process. Since we have been a contributing member of the State of Hawaii for over fourteen (14) years without any problems, we at least deserve the benefit of the doubt that we are indeed a good actor. **However, HB389 discriminates against for-profit degree-granting institutions in Hawaii and creates and propagates biases not found in any other profit-based businesses in any other industry. This is legally unprecedented.**

In general, it’s hard enough as it is to continue to operate a business. We are not tax-exempt like non-profit schools, nor do we receive millions in federal aid, unlike the University of Hawaii, who receives \$526.5 million from state taxpayers every year to operate in Hawaii. We already have a large handicap compared to non-profit schools, and we don’t believe that we need additional legislation to make operating an education-providing business in Hawaii any harder.

Laws like HB389 are anti-business and do not create a fair competitive environment, and they reward institutions that receive state funding and restrict companies that pay taxes and generate revenue and good non-tourism jobs for the state. The current business environment is unfair and makes it difficult for companies to thrive in Hawaii, which is why many institutions have already had to leave the state. Even the DCCA testimony says that this bill would create a disincentive for these companies to operate and register in Hawaii. **If COVID has proved anything, it is that the Hawaiian Economy needs to diversify itself from its dependence on the tourism industry. Attracting innovative education businesses to Hawaii and inviting good-paying tech jobs to remain in the state of Hawaii would help secure a more stable economic future.**

According to the Chamber of Commerce of Hawaii's testimony, "This bill unfairly places educational institutions with a certain tax status at a perceived disadvantage even though two educational institutions could have almost identical value and curriculum. [...] It seems the intent of this legislation is to favor some institutions over others based simply on an institution's tax status, rather than concerning itself with real protections for students attending all colleges and universities in Hawaii."

We already need to fight off the negative bias that's developed in recent years as a result of the bad actors in our industry. We were and are fully in support of the enforcement actions taken by the state and federal government to protect students by shutting down bad schools that took advantage of their students. The regulations enacted in the past were successful in getting rid of the bad actors. However, these new regulations penalize the good actors who remain, which in turn only hurts the students who can't afford to take out large student loans to attend a non-profit school.

The committees reference a report about **"U.S. Student Loans and Debt Levels Set Record: What's a Legislature to Do?" from May 2019 by the National Conference of State Legislatures** as evidence of for-profit institutions' wrongdoings. **However, nowhere in this paper do they even reference "Unaccredited" Degree Granting Institutions (UDGIs).**

In addition, this report is referenced in order to support the arguments against for-profit institutions, however the bill does not follow any of the recommendations made by the report. **The report referenced focuses on the negative implication of collective U.S. student debt. However, by definition, UDGIs cannot accept any student loans. Therefore, Unaccredited Institutions are neither mentioned in this report nor are part of the problems highlighted by the report, yet, the proposed bill indirectly targets UDGIs.** Both Nonprofit and For-Profit institutions offer student loans, yet this bill targets UDGIs who do not put students into debt and does not include Non-Profit institutions that also greatly contribute to the student debt problem in the US.

The latest U.S. Student loan debt statistics for 2021 show that students collectively owe nearly \$1.7 trillion in student loan debt. The national average student loan is \$37,693 and the Hawaii State average student loan is \$35,803. **According to the government's own data, the average debt of a student who attended a non-profit institution is higher at \$37,971 compared to a for-profit institution at \$21,244. (Source: Educationdata.org)** Therefore, students from for-profit institutions actually owe less than their counterparts at non-profit institutions.

This report also lists many "state-level policy recommendations" solutions to this problem such as Student Loan Forgiveness or Student Loan Bill of Rights to help prevent borrowers from making poorly-advised decisions. HB389 did not set in motion any of the solutions recommended by this report; instead, it recycled an older bill (HB1320) that did not pass in 2017. We should also note that last week, the Department of Education announced that they are planning to forgive the loans of students defrauded by the bad actors of 2016. Therefore, there is already federal legislation addressing this problem. Consequently, we also agree with the other accredited for-profit institutions that this bill does not create any added value or benefits for students in Hawaii but attempts only to single out for-profit institutions.

Mainly, we are arguing that unaccredited schools should not even be part of this discussion, let alone this bill, since students at UDGIs are not eligible to receive any kind of student loans or student aid and therefore do not fall under the purview of Department of Education and Title IV Funding. The problem is not for-profit degree-granting institutions. The problem is Student Loan Debt, and unaccredited institutions are the only ones that do not contribute to this problem. **UDGIs led to \$0 in student loan and federal aid. UDGIs are not even part of this problem, which is why we respectfully ask that all modifications proposed to Chapter 446e be removed from HB389.**

Based on the arguments above, we implore the legislature to table this bill based on the fact that the merits of this bill are not based on evidence from for-profit schools located in Hawaii. **More importantly, the Office of the Auditor's report states that the current laws are sufficient and that new regulations would not be cost efficient.**

HB389 is not based on actual evidence of wrongdoing by for-profit institutions in the State of Hawaii but results from the sweeping negative assumptions about for-profit institutions promoted in this bill. **Quantum University has never received any formal complaints to the DCCA and is a good example of a for-profit Institution of Higher Education that contributes to the State of Hawaii, takes great pride in a transparent admission process, provides excellent student support, and offers guidance toward gainful employment upon graduation.** Therefore, we would be happy to have a meeting with HPEAP to engage in a meaningful conversation about how we can better safeguard students in Hawaii.

Finally, if this bill is to be enacted in 2060, then this conversation should be postponed until 2060 when all parties can make educated decisions about the landscape of higher education at that time, rather than guessing now. It's impossible to predict 40 years ahead whether this legislation will adequately protect customers at that time. We also cannot predict the consequences of such regulations in 40 years, the increased expense this bill would incur, the potential loss of revenue, the need to let go of employees, or how challenging this would be for our industry as a whole. **In conclusion, our recommendation is to table this bill for the current legislative session and continue this conversation in 2060.**



Dr. Paul Drouin, M.D.
President of Quantum University
drpaul@quantumuniversity.com

Suggested Questions for Committee Hearings:

1. Based on the “Sunrise Analysis: Regulation of Unaccredited Degree-Granting Institutions”, can the committee please explain why this bill is going against the evidence and recommendations from the Office of the Auditor for the State of Hawaii?
2. If this bill goes against the recommendations of the Office of the Auditor, what current evidence of wrongdoing by for-profit institutions justify such additional regulations on for-profit institutions in Hawaii?
3. Have the "state-level policy recommendations" listed in the May 2019 report quoted in support of this bill been investigated first as a solution to the student debt problem in Hawaii?
4. Since no other states have ever passed such a bill such as HB389, in which the legal implication on for-profit business would be unprecedented, what evidence can be provided to proof that such regulations would help students?