

# Professional Assist Corporation



Professional Assist Corporation

25188 Genesee Trail Road, Suite 200

Golden, Colorado 80401

800-458-2267 · 303-674-8478

June 19, 2023

Dr. Miguel Cardona, U.S. Secretary of Education  
U.S. Department of Education  
400 Maryland Ave SW  
Washington, DC 20202

Dear Dr. Miguel Cardona and Department Staff,

Professional Assist Corporation (PAC) is a 27-year-old organization that runs professional membership organizations serving individuals practicing massage therapy, skin care, and hairstyling. Altogether, we have 118,000 members across the United States, of which slightly more than 100,000 are practicing professionals; the remainder are vocational school administrators and students.

Consumer demand for services in each of these three sectors we serve is burgeoning. We support training institutions in developing new practitioners to help meet this demand. We also provide extensive continuing education, free to our members, to help them refresh core responsibilities and add new skills.

### **A Commitment to Well-Trained Providers**

While PAC wants to encourage more individuals to pursue work in these professions, sheer numbers is not our goal. Ensuring clients receive quality services is our ultimate objective. We support psychometrically sound entry-level examinations for individuals to obtain state licenses for their professional work. We support schools that commit to continuous program improvement. We do not condone aggressive and deceptive marketing and recruitment practices, deceptive financial aid counseling, or institutional financial irresponsibility. To the extent your Department's proposed new Gainful Employment (GE) rules aim to curb malfeasance in those areas, we are aligned with you.

### **Realities of These Professions**

For many professions, a clear path from high school diploma to subsequent professional education followed by full-time work in that profession fits well with the Department's aim to promote gainful employment outcomes—including healthy alignment between scholarship and loan education financing and subsequent earnings potential. Those relationships and standards also fit for a proportion of individuals pursuing professional work in massage therapy, skin care, and hairstyling—but not all.

Some individuals seeking skill development in one of these fields aim to perform such work on a part-time basis. Especially in massage therapy, 15–20 hours per week of work on clients' bodies can be taxing. Some practitioners elect to combine half-time massage work with another less physically demanding job. In all three professions of massage therapy, skin care, and hairstyling, a meaningful proportion of those seeking training have the benefit of a spouse providing primary income, and so plan to work part time to reserve more time for family. Upon graduation from a vocational program,

they are able to devote a high proportion of early career earnings to loan repayment.

### **Measuring Earnings—Areas of Agreement**

Noting the realities of these specific careers, our comments below are along the lines of support for the Department of Education's general objectives but making sure "the shoe fits" in acknowledging the realities of the massage therapy, skin care, and hairstyling professions.

- We support your recommendation to add a year—measuring three years after program completion—to recognize that it takes time for independent massage therapy, skin care, and hairstylist professionals to build a practice. The reality is that most individuals in all three of these professions are attracted by performing the work, not necessarily excited by the business and marketing skills involved in acquiring clients. Likewise, many training institutions for these professions give only modest attention to building business skills. To that end, one of the priority resources provided by PAC associations to our members is an array of instructional materials to supplement the business curriculum training they received in school.
- We support looking at *median earnings* rather than *mean earnings* as the more appropriate choice in comparing earnings generated by graduates of these professional programs to earnings generated by the cohort of high school graduates who didn't have the benefit of vocational continuing education.
- We support making these earning comparisons by state rather than using a single national measure. Economic environments differ considerably by region and state.
- We support the Department's recommendation to use Internal Revenue Service income information rather than alternative data from other sources.

Overall, we like the Department's decision to measure training program effectiveness by graduates' actual earnings over time rather than initial job placement ratios. The job placement approach devolved into too much gamesmanship.

### **Measuring Earnings—Areas of Disagreement**

While supportive of many of the Department's GE rules, we have areas of disagreement. The proposed new regulations do not adequately consider the choice many individuals elect to work part time in these professions. For example, the median weekly hours PAC's massage therapy members devote to that work is 17. That's centrally a product of the challenging physical nature of the work and/or a preference to limit massage weekly hours to 20 or fewer. That result may give rise to a relatively large proportion of earnings going to loan repayment in the initial years of practice. The proposed stretching of measurement points to three years after graduation helps but may not solve the problem completely.

As to under-reporting of earnings—something prevalent in a variety of professions in which tipping is customary—we are sympathetic to the Department's position that the law requires accurate reporting of all income. **The challenge is that training institutions have no control over the income reporting practices of their graduates.** It has been made clear over the years that the Bureau of Labor Statistics (BLS) data—because it covers only employees earning a wage, not individuals who are self-employed—portrays an incomplete and misleading picture for the three professions discussed above. A beauty [industry project](#) has shown a significant difference in compensation, which, if considered, would dramatically change the GE calculus. There needs to be consideration for this data, as well as for schools whose graduates do take in enough income from massage therapy, skin care, or hairstyling to justify investments in their schooling yet choose not to report all their gratuities. The GE rules feel like the proverbial killing of an ant with a sledgehammer.

**In Conclusion**

What often goes unspoken is that a major proportion of the upper half of high school graduates move on to universities, four-year bachelor's degree programs, or two-year programs. Vocational schools are more often drawing from students whose high school performance fell in the bottom half of their classes. While there are bad actors among vocational training institutions, the clear majority are providing an important societal function of imparting needed skills for honorable jobs that enhance the health and well-being of their clients across the spectrum of American society. The Department needs to keep sight of this larger purpose in supporting vocational training while weeding out those who are failing in that mission.

Sincerely,

Les Sweeney  
President/CEO  
Professional Assist Corporation