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**COMMENT ON A MAJOR OMISSION IN THE STATEWIDE PLAN FOR HIGHER EDUCATION**

The overall thrust of the plan is valuable, however it does not encompass the role of the hundreds of licensed non-degree granting post-secondary institutions. On page 12 , the draft plan mentions that over 200,000 students are served annually by approximately 500 trade, business and ESL schools licensed by the State Education Department and overseen by the Bureau of Proprietary School Supervision. That number is about four times the annual numbers completing proprietary college programs. After that reference on page 12, the draft plan is silent as to the role of our non-degree granting licensed post-secondary schools. This is a major omission in the plan that should be rectified. The training available through non-degree granting career schools is an important part of the training initiatives needed for a competitive 21<sup>st</sup> century workforce in countless fields. These programs must be seen as an integral part of the K – 16 continuum and should be integrated into the Statewide Plan for Higher Education. Their omission from the plan will limit and restrict options and opportunities for millions of New Yorkers during the period of the plan's implementation.

The Coalition of New York State Career Schools is an association of licensed career schools that has been serving New York schools and students for over sixty-five years.

Respectfully submitted,  
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