SUNYFAP Conference 2016
Gainful Employment

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Gainful Employment (GE) is here to stay for ALL schools. GE is an institutional commitment not just a "financial aid issue". This session will focus on the institutional responsibility of reporting, maintaining eligibility for current programs and establishing eligibility for new GE programs, ensuring compliance with the regulations.
Status of GE Regulations

- Final Rule published in the Federal Register on October 31, 2014
  - 34 CFR Parts 600 and 668 Program Integrity: Gainful Employment
- Effective date July 1, 2015
- Disclosures will be made under the current regulations until December 31, 2016
- Institutions must comply with new disclosure requirements beginning January 1, 2017
Quick Review: Which Programs are GE Programs?

- **Programs Offered by For-Profit Institutions** - All educational programs offered by for-profit (proprietary) institutions are GE Programs with the following three exceptions:
  - Preparatory coursework necessary for enrollment in a Title IV eligible program
  - Approved Comprehensive Transition and Postsecondary Programs for students with intellectual disabilities
  - A limited number of bachelor degree programs in liberal arts if the institution has been regionally accredited since October 2007 and the program has been offered by the institution since January 2009
Which Programs are GE Programs

- Programs Offered by Public and Private Non-Profit Institutions - All non-degree educational programs offered by public or private non-profit institutions are GE Programs with the following four exceptions:
  - Programs of at least two years in length designed to be fully transferable to a bachelor’s degree program where the institution does not confer a credential upon completion of the coursework
  - Approved Comprehensive Transition and Postsecondary Programs for students with intellectual disabilities
  - Preparatory coursework necessary for enrollment in an eligible program
  - Teacher certification programs where the institution does not award a credential
GE Tools for your Campus


- Gainful Employment Final Regulations were published October 31, 2014. The IFAP website provides the best resource for FSA programs required to lead to GE in a recognized occupation.
Financial Aid Professionals (IFAP)

The Information for Financial Aid Professionals (IFAP) Web site consolidates guidance, resources, and information related to the administration and processing of Title IV federal student aid into one online site for use by the entire financial aid community.

The most recent postings to the site are listed in section.

Hot Topics

- Program Integrity Information - Questions and Answers
- Federal Student Aid Data Center
- Disaster Assistance
- Security Reminder – SAIG Data Protection

Information Pages

- Early FAFSA
- Gainful Employment
- 150% Direct Subsidized Loan Limit
- Campus-Based Programs
- Default Prevention
The latest on GE since the FSA Conference

- GE Announcement #70 - Reminder of Upcoming Deadline for GE Program Transitional Certification – November 20, 2015
- GE Announcement #71 - Reviewing and Correcting GE Completers Lists – December 11, 2015
GE Announcement #70 – Transitional Certification

- Submission to the Department of the GE Program “Transitional Certification” no later than December 31, 2015.

- Regulation 34 CFR 668.414, an institution’s most senior executive officer must sign a certification that each of the institution’s currently eligible GE programs listed on its Eligibility and Certification Approval Report (ECAR) meets the requirements of 34 CFR 668.414(d).

If an institution has submitted an E-App that resulted, or will result, in a new Program Participation Agreement (PPA) issued to the institution after July 1, 2015 and before December 31, 2015, those PPAs will have the required GE program certification included; therefore no Transitional Certification will be required.
Draft GE Completers Lists will be sent to each institution that has one or more GE Programs.

Sending institutions their GE Completers List is the second step, following GE reporting by institutions to NSLDS, in the multi-step process of calculating a GE program’s Debt-to Earnings rates.
Reviewing and Correcting GE Completers Lists

- Institutions will have 45 days from the date NSLDS sends out Draft Completer Lists to provide evidence of incorrect information on the list.
- If there are errors on the Draft Completers List, an institution must use the Data Challenges and Appeals Solution system (DCAS) to request a correction or to submit a challenge.
- Upon confirmation that DoE agrees with the request for correction the institution should also correct their data in NSLDS GE reporting so that the correct information will be used in subsequent GE calculations and for GE disclosures.

Detailed information about the DCAS system GE Electronic Announcement #67 October 26, 2015
Detailed information about the GE Completers List.

- NSLDS will generate and send the Draft GE Completers Lists.
- The Draft GE Completers List will be pushed to a school's designated Student Aid Internet Gateway (SAIG) mailbox, if the school has one or more GE Programs.
- Schools will have 45 days to review and challenge the information in the file. NSLDS will then send each school its Final GE Completers List.

National Student Loan Data System (NSLDS) Gainful Employment User Guide (Only 277 pages)!
Helpful Webinars by DoE

- "Interpreting the GE Completers List"
  - [http://ifap.ed.gov/ifap/ifapMedia.jsp#MOD4CompletersListWebinar11182015](http://ifap.ed.gov/ifap/ifapMedia.jsp#MOD4CompletersListWebinar11182015)

- "How to Submit a Challenge to the GE Completers List"
GE Announcement #73 - Spring 2016 Distribution of Draft GE Completers Lists

- DoE would like to inform the community that the distribution of the Draft GE Completers List will occur in Spring 2016, rather than winter as previously announced.
- GE Programs with program completers in award years 2010-2011 and 2011-2012.
- An Electronic Announcement to the IFAP website announcing the date that the Draft GE Completers Lists will be distributed to institutions.

Consistent with the GE regulations at 34 CFR 668.405, institutions will have 45 days from that announced date to submit any corrections or challenges to the information included in the Draft GE Completers Lists.
The disclosure requirements in the GE regulations that were published on October 31, 2014 do not take effect until January 1, 2017.

Institutions must continue to comply with the current disclosure requirements by updating their disclosures each year in accordance with 34 CFR 668.6(b), using the Department’s GE Disclosure Template. All other provisions of the GE regulations published on October 31, 2014 became effective on July 1, 2015.
Required Disclosures

- Occupations
- Normal time to complete program
- On-time graduation rate for completers
- Tuition & fees, books & supplies, room & board
- Placement rate for completers (as determined by State or Accreditor methodology)
- Median loan debt
- Other program information provided by the Secretary
Required Disclosures

- **Occupations**

- **Normal time to complete program**
  - This is listed on the schools E-App question 27
  - Number of Weeks, Credits & Type (i.e. Semester)
Required Disclosures

- On-Time Graduation Rate for Completers
  - Specify the percent of students who completed in the most recently completed award year within normal time
On-Time Graduation Rate for Completers includes:

- Leaves of absence
- Time if a student withdrew and then returned
- Enrollment in other programs if the student did not complete the other program
Educational Costs

- Provide tuition & fees charged for completing the program within normal time
- Provide typical costs for books & supplies (unless included in tuition and fees)
- Provide costs for room & board, if applicable
- Other expenses are optional, but provide a link/access to program cost information under Student Right-to-Know
Required Disclosures

- **Median Loan Debt**
  - Specify the median (not mean) loan debt incurred by students who completed the program

- **Three categories of debt → 3 medians!**
  - Title IV, HEA program loans
  - Private education loans
  - Institutional financing plans
Disclosure Availability

- Include the Template in all promotional materials about the GE program
  - Promotional materials include invitations, ads, course catalogs, social media, etc. that mention or otherwise refer to a specific GE program
  - If not feasible to include the Template, include a live link or URL to it and clearly explain what is available at that Web page
Disclosure Availability

• Post the Template on your institution’s Web page
• Prominently display direct links to the Template on:
  ▪ The GE program home page
  ▪ Other institutional Web pages about the GE program
Disclosure Template

- The template is an application that creates a standardized Web page with the GE disclosure information
- Web page must be hosted on your Institution’s site
GE Program Disclosure Template

- INSTITUTION OPE ID
- PROGRAM INFORMATION
- COST
  - DEBT AT PROGRAM COMPLETION
  - PROGRAM COMPLETION IN NORMAL TIME
  - JOB PLACEMENT
  - CONTEXT
Gainful Employment Program Disclosure Template

This input template is to be used to meet the gainful employment disclosure requirements as required by the regulations at 34 CFR 668.6(b)(2)(iv).

Enter the information requested for each program at your institution subject to the gainful employment regulations. Generally, gainful employment programs include:

» At public and private non-for-profit institutions:
  Title IV-eligible non-degree programs (e.g., certificate and diploma programs).

» At for-profit institutions:
  All Title IV-eligible instructional programs, degree and non-degree.

Enter the institution’s 6-digit Department of Education assigned OPE ID:

[Input field]

Next ➔
Excelsior College  (002834)

Enter the U.S. Department of Education 6-digit Classification of Instructional Program (CIP) code for the gainful employment program (e.g., 11.0101), or enter a partial CIP code (two or more digits) and click “Search CIP” to browse a list of potential 6-digit matches:

51.0701  Search CIP

CIP Program Name: Health/Health Care Administration/Management

Enter the institution’s name for this program (if different from the CIP Program Name shown above):

Health Care Management

Select the credential level for this program:

Graduate certificate

Occupations for which this program prepares students  (1 occupation(s) selected)
Click on the link above to choose from a list of Standard Occupation Classification (SOC) codes commonly associated with this program’s CIP code. If this program prepares students for an occupation not listed, click here to enter the name and SOC code of the occupation for which this program prepares students.
Excelsior College (002834)
CIP Program Name: Health/Health Care Administration/Management

Include costs for completion of the entire program, assuming normal time to completion. Enter amounts in whole dollars.

Enter the total tuition and required fees for the entire program, assuming normal time to completion:

8000

Enter the total estimated costs for books and supplies for the entire program:

875

Enter the total costs to the student for on-campus room and board for the entire program, assuming normal time to completion:

Check here if your institution does not provide on-campus housing for students enrolled in this program.

Enter any fees or expenses that students have in addition to those already entered for tuition and required fees, books and supplies, and room and board (for example: optional equipment, parking permits, etc.):

Enter the URL for other program cost information available on your institution's website pursuant to Sec. 689.43(a):

http://www.excelsior.edu/costs-and-financing
Excelsior College  (002634)
CIP Program Name: Health/Health Care Administration/Management

Enter the number of students who completed the program between July 1, 2014 and June 30, 2015:

28

Of the 28 completers reported above, enter the number completing with any student loan debt as a result of attendance in this program (optional):

22

For all students (both borrowers and non-borrowers) completing the program between July 1, 2014 and June 30, 2015, enter the median cumulative amount of debt for each of the following, in whole dollars:

Title IV student loan debt:  

Private loan debt:  

Institutional financing plan debt:  

If you offer multiple programs with the same CIP Code and Credential Level, consider separate disclosure templates if there is a significant difference in the:

- Published length of the program
- Tuition, fees, or other costs
- Placement rate calculations (e.g., offered in different States)
Transitional Certification Detail

- Required of currently participating institutions offering GE programs
  - New or returning institutions that have an E-App in process will have the required certifications included in the resulting Program Participation Agreement (PPA)
- Must be submitted to the Department no later than December 31, 2015, unless:
  - Institution has submitted an E-App that resulted or will result in a new PPA executed between July 1, 2015 and December 31, 2015
    - Must be signed by institution’s President/Chancellor/CEO
- Certifications renewed when institution recertifies PPA
Institution must update information about its GE programs using the application to participate in Federal Student Aid Programs (E-App) so that its Eligibility and Certification Approval Report (ECAR) is current.

Institution must certify that each GE program it offers:

- Is approved by a recognized accrediting agency or otherwise included in the institution’s accreditation by its recognized accreditation agency
- If a public vocational institution, is approved by a State agency recognized to approve such programs in lieu of accreditation
- Is programmatically accredited if required by a Federal governmental entity or by a governmental entity in the state where the institution is located or in which it is otherwise required to obtain State approval
Certifications

- Satisfies applicable educational prerequisites (in the State in which the institution is located or in which it is otherwise required to obtain state approval for professional licensure or certification requirements in that State) so that a student completing that program and seeking employment in that State qualifies to take any licensure or certification examination needed to practice or find employment in in an occupation that the program prepares students to enter.

- Is not substantially similar to a program offered by the institution that, in the prior three years, became ineligible under the D/E rates measure or was failing, or in the zone, and was voluntarily discontinued by the institution.
  - Programs that share the same four-digit classification of CIP code are considered to be substantially similar.
Certifications

- Changes after transitional cert requirement have been met:
  - Institution adding or revising GE information on E-App that does not result in a new PPA must provide a new certification each time the E-App is updated
  - Includes:
    - Establishing or reestablishing the eligibility of a program
    - Discontinuing a program’s eligibility
    - Ceasing to provide a program for 12 consecutive months
    - Losing program eligibility
    - Changing a program’s CIP code, or credential level

- ED will monitor (on an ongoing basis) certifications for accuracy and completeness

GE Electronic Announcement #54 – Certification Requirements for Gainful Employment Programs
Questions