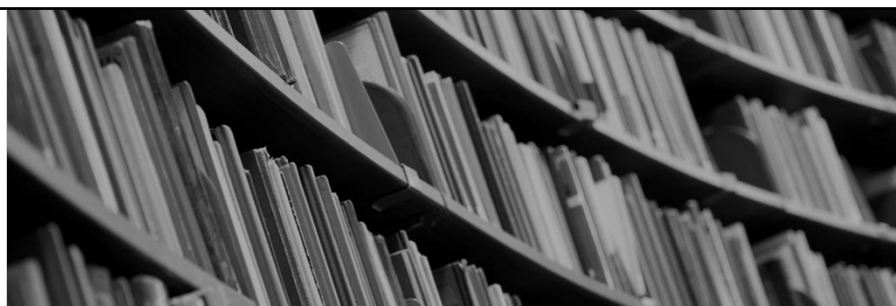


Presented to Academic Senate on December 4, 2018



Meeting Financial Aid Consumer Information Disclosure Requirements

A Review of Coastline College's Compliance

November 2018

Many, Many Rules and Regulations

- There are many rules and regulations relating to U.S. federal student aid
 - 2,583 pages of regulations (34 CFR)
 - 846 pages of the Higher Education Act of 1965
 - Title IV is 374 pages
 - 1,424 pages of the Federal Student Aid Handbook (2017-2018)
 - 1,544 Dear Colleague Letters from 1994 to 2017
 - 6,825 Electronic Announcements from 1994 to 2017

Federal Disclosure Requirements

- A college or university participating in the Federal Title IV programs must annually disclose to the public and report to the U.S. Department of Education the following:
- Financial assistance available to students
 - Information about the school's academic programs, costs, facilities, and policies
 - Withdrawal procedures, refunds and returns of financial aid
 - Accreditation and licensure
 - Services and facilities for disabled students
 - Transfer of credit policies
 - Contact information
 - Penalties and institutional policies on copyright infringement
 - Student activities

3

Federal Disclosure Requirements (continued)

- Student body diversity
- Net Price Calculator
- Financial Aid Shopping Sheet
- Retention and Placement
- Completion, Graduation, Transfer, Retention, and Placement Rates
- Disclosures and Gainful Employment (GE) Programs
 - Disseminating information about gainful employment programs
 - Updating GE disclosure requirements
 - Program webpages
 - Promotional materials
- Campus Crime and Safety Information
 - Crime log
 - Crimes to be reported

4

Federal Disclosure Requirements (continued)

- Annual submission of campus security statistics
 - Distributing security to enrolled students and current employees as well prospective students and employees
- Emergency response and evacuation procedures
- Timely warning and emergency notification
- Drug and Alcohol Abuse Prevention
 - Information to be included in drug prevention materials for students and employees
 - Distribution of materials to all students and employees
 - Drug and alcohol abuse and prevention programs
 - Drug-Free Workplace requirements for Campus-Based schools

5

Federal Disclosure Requirements (continued)

- Textbook Information
- Loan Counseling
 - Entrance counseling
 - Exit counseling
 - Providing borrower information at separation
 - Counseling methods
 - Financial literacy
 - At-risk students
- Family Education Rights and Privacy Act of 1974 (FERPA)
- Misrepresentation
- Voter Registration

6

Review Process

- Locate appropriate disclosure on campus or district website or in written format
- Review disclosure requirement(s) with key campus/district officials responsible for each disclosure
- Note any areas in and not in compliance on spreadsheet
- Monitored corrective action needed, date completed, and responsible individual(s) and offices
 - Provided advice and counsel to meet federal regulatory compliance
- Worked with Communications to post disclosure requirement(s) and list URLs to locate disclosure on Coastline website
- Review of Consumer Information Disclosure document

7

Sample Page from Consumer Information Disclosure Document

Topic/Related Activity	Recipient of the Requirement	Sources	Required Information/Regulatory, Law Resource Links	Method of Disclosure	Assigned To /Date Completed
Notice of Availability of Institutional and Financial Aid Information	All Participating Title IV Schools	HEA 485 (a)(1)(A)-(C) 608-41 (e) (1) 608-42 (a) (8) 2016-17 FSA Handbook, pp 2-110 to 2-111	34 CFR 668.41 (a)-56 ; 34 CFR 668.42 ; 34 CFR 668.43 Each school must annually distribute to all enrolled students a notice of the availability of the information that is required to be made available to students under the Family Educational Rights and Privacy Act of 1974 (FERPA) and under Section 485(a)(1), Section 485(d), Section 485(e), Section 485(f) and Section 485(g). The notice must list and briefly describe the information and include a statement of the procedures required to obtain the information. For information listed in the notice that is disclosed on a school's website, the notice must include the exact electronic address and a statement that the school will provide a paper copy upon request.	http://www.coastline.edu/education/information-disclosure Pages 29-30.	D. Levy, Interim Dir. of FA Completed 7/2018
Contact Information for Assistance in Obtaining Institutional or Financial Aid Information	All Participating Title IV Schools	HEA 485 (a)(1)(A)-(C) 608-41 (e) (1) 608-42 (a) (8) 2016-17 FSA Handbook, pp 2-110 to 2-111 HEA 485 (a)(1)(D), (e) 608-43 (a) (8) 608-44	34 CFR 668.43 ; 34 CFR 668.44 Each school must make available to prospective and enrolled students information regarding how and where to contact individuals designated to assist enrolled or prospective students in obtaining the institutional or financial aid information required to be disclosed under HEA Section 485(a)(1), Section 485(d), Section 485(e), and Section 485(g).	http://www.coastline.edu/education/information-disclosure Pages 29-30.	D. Levy, Interim Dir. of FA Completed 7/2018
Student Financial Aid Information	All Participating Title IV Schools	HEA 485 (a)(1)(A)-(C) 608-41 (e) (1) 608-42 (a) (8) 2016-17 FSA Handbook, pp 2-110 to 2-111	34 CFR 668.41 (a)-56 ; 34 CFR 668.42 ; 34 CFR 668.43 Each school must make available to prospective and enrolled students in the manner above: <ul style="list-style-type: none"> • All the need-based and non-need-based federal, state, local, private and institutional student financial assistance programs available to students who enroll at the school • Terms and conditions of the Title IV, HEA loans • Criteria for selecting recipients and for determining award amount • Eligibility requirements and procedures for applying for aid • Methods and frequency of disbursements of aid • Rights and responsibilities of students receiving Title IV, HEA student Financial Aid, including criteria for continued student eligibility and standards for Satisfactory Academic Progress • Terms of any loans received as part of financial aid package, sample loan repayment schedule, and the necessity for repaying loans 	https://www.coastline.edu/information-disclosure/Consumer-Information.aspx Terms of any loan, etc.: http://www.ccc.edu/information-disclosure/Federal-Direct-Loan-Program.aspx	Completed FAO 8/26/2018
Student Financial Aid Information (continued)	All Participating Title IV Schools	HEA 485 (1)(G), (N) 608-41 (e) (1) 608-43 (a) (9) 2017-17 FSA Handbook, p. 2-112	34 CFR 668.41 (a)-56 ; 34 CFR 668.42 ; 34 CFR 668.43 <ul style="list-style-type: none"> • Procedures and criteria by which students apply for assistance • A statement that enrollment in a program of study approved for credits by the home school may be considered enrollment in the home school for purposes of applying for federal student financial aid • General conditions and terms applicable to employment provided as part of financial aid package • The exit counseling information the school provides and collects 	http://www.coastline.edu/information-disclosure	K. Dusham, Distance Learning C. Jakonen, Webmaster Completed 7/27/2018

8

Headings from Consumer Information Disclosure Document

- Topic/Related Activity
- Recipient of the Requirement
- Sources
- Requirement Information / Regulatory, Law Resource Links
- Method of Disclosure
- Assigned To / Date

9

Findings and Recommendations

- Openness and collaborative attitude of administration, faculty and staff
- Outdated info on Coastline website - now in compliance
- Several areas on district website needing updates - in progress
- Dynamic nature of disclosure document requires annual update(s)
- Importance of updating disclosure or placing Coastline's receipt of Federal Title IV funding in jeopardy
 - College could be subject to limitation, suspension, and termination (LS&T) of federal student financial aid funds

10