Simplifying HEOA: Using a Self-Audit Checklist to Determine Compliance

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Session Goals

- Provide background on HEOA
- Discuss impact on institutions
- Direct participants to resources

The presenters are not stating how HEOA must be done, rather, we are sharing our experiences.
HEOA Background
About HEOA

- The Higher Education Act of 1965 (HEA), as amended by the Higher Education Opportunity Act of 2008 (HEOA), includes many disclosure and reporting requirements.

- “A disclosure requirement is information that a postsecondary education institution is required to distribute or make available to another party, such as students or employees.”

Source: National Postsecondary Education Cooperative’s Information Required to be Disclosed under the Higher Education Act of 1965: Suggestions for Dissemination.
HEOA compliance is not optional.
Guiding Resource

- National Postsecondary Education Cooperative’s *Information Required to be Disclosed under the Higher Education Act of 1965: Suggestions for Dissemination*
  - Provides guidance to make information more accessible and understandable to consumers and more comparable across institutions.

Issues with Consumer Information

Prior to HEOA guidance from NPEC:

- Institutional information was difficult to locate on websites.
- Definitions, collection processes, and distribution of information varied.
- Information was difficult to compare across institutions.

Source: National Postsecondary Education Cooperative’s Information Required to be Disclosed under the Higher Education Act of 1965: Suggestions for Dissemination.
Purpose

- The purpose of this presentation is to provide institutions with a tool to *simplify the process of meeting HEOA disclosure standards.*
NPEC Disclosure Suggestions

- Focus both on compliance and communication.
- Develop a single web page on the institution’s website that provides hyperlinks to the HEOA disclosure information.

Source: National Postsecondary Education Cooperative’s Information Required to be Disclosed under the Higher Education Act of 1965: Suggestions for Dissemination.
NPEC Disclosure Suggestions

- Adopt a “3-click” approach.
- Use consumer-friendly labels and language whenever possible, and avoid institutional/technical jargon.
- Use a common set of content titles.

Source: National Postsecondary Education Cooperative’s Information Required to be Disclosed under the Higher Education Act of 1965: Suggestions for Dissemination.
NPEC Suggested Web Site Organization

1. Notice of Availability of Institutional and Financial Aid Information
2. Contact Information for Assistance in Obtaining Institutional or Financial Aid Information
3. General Institutional Information
4. Teacher Preparation Program Report
5. Student Financial Assistance
6. Health and Safety
7. Student Outcomes
8. Intercollegiate Athletic Program Participation Rates and Financial Support Data
9. Voter Registration

Source: National Postsecondary Education Cooperative’s Information Required to be Disclosed under the Higher Education Act of 1965: Suggestions for Dissemination.
Examples of Specific Disclosure Requirements

1. Privacy of Student Records—Family Educational Rights and Privacy Act (FERPA)
2. Facilities and Services for Students with Disabilities
3. Student Diversity
4. Price of Attendance
5. Net Price Calculator
6. Refund Policy and Requirements for Withdrawal and Return of Federal Financial Aid
7. Textbook Information
8. Educational Program
9. Instructional Facilities
10. Faculty
11. Transfer of Credit Policies and Articulation Agreements
12. Accreditation, Approval, and Licensure of Institution and Programs
13. Copyright Infringement—Policies and Sanctions
14. Computer Use and File Sharing
15. Student Activities
16. Career and Job Placement Services
17. Teacher Preparation Program Report
18. Student Financial Assistance
19. Alcohol Abuse Prevention Program
21. Policies, Fire Statistics and Fire Log (On-Campus Housing Facilities)
22. Retention Rate
23. Graduation Rates (Student Right-to-Know Act)
24. Rates (Student Right-to-Know Act)
25. Graduation Rates for Students Receiving Athletically Related Student Aid (Student Right-to-Know Act)
26. Transfer-out Rates for Students Receiving Athletically Related Student Aid (Student Right-to-Know Act)
27. Transfer-out Rates for Graduates
28. Job Placement for Graduates
29. Job Placement Rates for Graduates
30. Graduate and Professional Education Placement for Graduates

There are a total of 51 items that require institutional responses.
Disclosure Methods

- Information is distributed in a variety of methods, including:
  - Distributed to relevant parties
  - Made available through appropriate publications, mailings, or electronic media
  - Provided upon request
  - Open for public inspection
  - Provided to general public
  - Published on website
Implementation of HEOA Web Site
Implementation Issues

- Issues experienced:
  - Similar to those indicated by NPEC:
    - Unable to locate information on institutional websites
    - Pieces of information belong to different departments
    - Information not gathered or disseminated
    - Variance in terms and definitions
    - Lack of ownership
Development of a HEOA Process

- Review of consumer websites for reference
- Locate relevant institutional resources to meet HEOA needs
- Determine items that are not available and need to be collected
- Create checklist of all HEOA items for tracking
Development of HEOA Checklist

• To resolve the issues encountered:
  • Created a checklist which:
    • Categorizes information
    • Provides links to definitions
    • Indicates distribution method
    • Indicates responsibility
    • Provides links to online information
    • Provides links to archived files
    • Indicates confirmation of completion
# Development of HEOA Checklist

<table>
<thead>
<tr>
<th>#</th>
<th>Subject Category</th>
<th>Link to Official Guidance</th>
<th>Official Guidance on Distribution</th>
<th>Distribution Method</th>
<th>Office Responsible</th>
<th>Link to Online Documentation (if available online)</th>
<th>Archive Documentation</th>
<th>Notes</th>
<th>Confirmation By</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Financial Aid</td>
<td>Notice of Availability of Institutional and Financial Aid Information</td>
<td>Notice is distributed to each enrolled student</td>
<td>Email/Mail</td>
<td>Student Affairs</td>
<td>N/A</td>
<td>N/A</td>
<td>Required input from Director of Financial Aid.</td>
<td>VPSA</td>
</tr>
<tr>
<td>2</td>
<td>Financial Aid</td>
<td>Contact Information for Assistance in Obtaining Institutional or Financial Aid Information</td>
<td>Made available through appropriate publications, mailings, or electronic media</td>
<td>Online</td>
<td>Student Affairs</td>
<td><a href="http://www.valdosta.edu/financialaid/">http://www.valdosta.edu/financialaid/</a></td>
<td>Archive copy</td>
<td>Easy - was already on Financial Aid website</td>
<td>VPSA</td>
</tr>
<tr>
<td>3</td>
<td>Financial Aid</td>
<td>Student Financial Aid Information</td>
<td>Made available through appropriate publications, mailings, or electronic media</td>
<td>Online</td>
<td>Student Affairs</td>
<td><a href="http://www.valdosta.edu/financialaid/1011_PDF_files/Financial_Aid_Booklet_2010-2011.pdf">http://www.valdosta.edu/financialaid/1011_PDF_files/Financial_Aid_Booklet_2010-2011.pdf</a></td>
<td>Archive copy</td>
<td>Required input from Director of Financial Aid.</td>
<td>VPSA</td>
</tr>
</tbody>
</table>
Implementation of Checklist

- Checklist template implemented by three institutions:
  - Macon State College
  - Valdosta State University
  - Wake Forest University
Macon State College

- Founded in 1968
- Located in Macon, GA (1 hour south of Atlanta)
- Schools:
  - Arts and Sciences, Business, Education, Information Technology, and Nursing & Health Sciences
- Fall 2010 enrollment – 6,232
- Student/faculty ratio – 22/1
HEOA - Macon State College

- No one assumed responsibility initially
- Institutional Research & Planning took the lead on organization – NOT COMPLIANCE, itself
- Visited with the appropriate offices to determine current compliance or what was needed
HEOA - Macon State College

- Working through the challenges of the process
  - Time
  - Definitions
  - Process for ensuring accurate information
- Created a HEOA Compliance web site to display all components in one location
Valdosta State University

- Founded in 1906
- Located in South Georgia
- Schools:
  - Arts, Arts and Sciences, Business, Education, Nursing, and Graduate
- Fall 2010 enrollment – 12,898
  - Undergraduate – 10,794
  - Graduate – 2,104
- Student/faculty ratio – 22/1
HEOA - Valdosta State University

- One office organizes the process
  - Strategic Research & Analysis took first pass on assignment of information
- Similar to assessment – content experts need to verify information
  - Meet with respective VPs to review each item
If we don’t understand the information, others won’t either.

- Link to live pages to make updates easy.
  - Be sure to check links occasionally.
- Archive all active data and links at least once a year.
• Founded in 1834
• Schools
  • Arts and Sciences, Business, Divinity, Graduate, Law, and Medicine
• Total FTE enrollment – 7,071
  • Undergraduate – 4,621
• 6 year graduation rate – 90%
• Student/faculty ratio – 11/1
• SAT/ACT optional in 2009
HEOA - Wake Forest University

- Financial Aid Office took lead initially
  - Largest stake holder
- Office of Compliance now coordinates all
  - Located at medical school campus
  - Meetings with responsible offices
    - Spreadsheet of activities by responsible offices and dates
HEOA - Wake Forest University

- Consumer information web site developed
  - [http://www.wfu.edu/administration/consumer-info/](http://www.wfu.edu/administration/consumer-info/)
- Challenges for updating site
- Broken links
- Meeting to change ownership from University Web Master to Compliance Office
- Goal to display prominently completed web site at university home page
Wake Forest - Example of Responsibility

### Drugs and Alcohol

- **Gather data to be added to the next biennial drug and alcohol review**
  - Number of drug and alcohol-related violations and fatalities on campus or as part of institutional activities
  - Number of sanctions imposed by institution as a result
- **Assure that campus officials responsible for required disclosures to students are aware of new requirements including a written notice advising students of the penalties for drug violations**

<table>
<thead>
<tr>
<th>Date</th>
<th>HEA Sec. 120 HEOA Sec. 107</th>
<th>Responsibilities</th>
</tr>
</thead>
<tbody>
<tr>
<td>August 14, 2008</td>
<td></td>
<td>Student Health Services, Campus Police, Human Resources, Judicial Affairs</td>
</tr>
</tbody>
</table>
HEOA Web Sites
MSC Consumer Information Website

Web site: www.maconstate.edu/ir/heoa.aspx
VSU Consumer Information Website

Web site: www.valdosta.edu/sra/Consumer/
WFU Consumer Information Website

Web site: [www.wfu.edu/administration/consumer-info/](http://www.wfu.edu/administration/consumer-info/)
Thank You

Questions and Comments

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