

CAPPS 2017 Conference

“Finding & Staying True North to Student Expectations & Key Compliance Requirements ... In An Enrollment Challenged Environment”



Hyatt Mission Bay, San Diego

October 12, 2017

Ron Holt | Vickie Russ | Sally Samuels

Meeting Expectations & Requirements

Enrollment Goal:
Volume

Desired Outcome:
Grads



Meeting Expectations & Requirements

**Grads Who Get Jobs &
Earn \$\$**

**to pay College Debt &
Thrive**



TOUGH ENVIRONMENT OF COMPETITION: Less PSE Demand – Risk in School Response

ENVIRONMENT – DEMAND FOR PSE SEATS DOWN, AS HIGH SCHOOL GRADUATES DOWN SINCE 2014

PSE Enrollments - declining or flat for past 4 years

Why? *Chronicle* Jan 2014: 95 4yr olds for very 100 18yr olds

William T. Conley, VP Bucknell University. "If they weren't born, they're not going to go to college."

DOE reports FAFSA volume down last 3 years by 3% to 5%

Only 34% major colleges met class goals for this Fall

Pressure to fill seats? Thomas Kean, at Drew U, small

**liberal arts colleges: "pressures are worse
than they've ever been"**



TOUGH ENVIRONMENT OF COMPETITION: Less PSE Demand – Risk in School Response

Stagnation forecast HS grads to 2023 (NCES/WICHE)

Gallup Study of Community College Leaders

Inside Higher Education 4-21-17

*Surveyed over 200 community college leaders

*60% community colleges: enrollment declines last 3 yrs

***Their planned strategies to increase enrollment:**

- New campus programs
- Transfer students – easing transfer conditions/process
- Spending more on marketing Adding online programs
- Freezing or cutting tuition.

Career Focused Colleges: Pew Research 9-17 study:

50% of Americans believe college should focus on skills

2016 Was a Tough Regulatory Year

- ❑ Many school closings – ITT, Medtech, Heritage, Marinello, Regency, many others
- ❑ Hundreds of campuses, tens of thousands of students, hundreds of millions of T4 loans
- ❑ ACICS defrocked with hundreds of schools scrambling & some closing
- ❑ GE, borrower defense reg, new audit guide
- ❑ DOE opposing nonprofit conversions
- ❑ Aggressive use of HCM2/LOCs, resistance to new programs/locations and new T4 schools

But the Difficult Obama Years Are Over!!

**Obama & King Are
Out, Sun Has Set on
Them**



**Trump & DeVos Are
In, Smoother Sailing
Ahead?**



So There's a Trump Card in Your Hand, But...

**Don't Gamble With
Students' Futures
...Or**

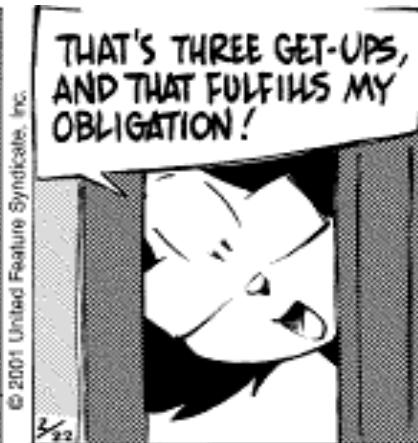
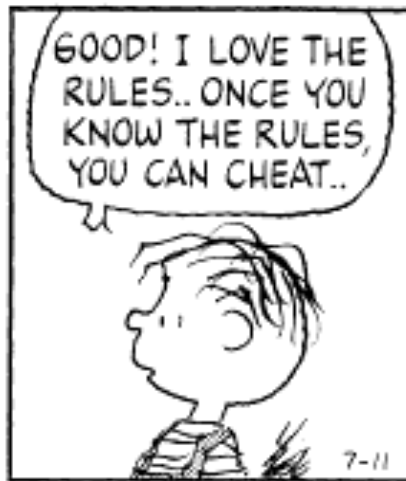
**Your Chips Will be Down
and The Herd Will Leave
You**



EXPECTATIONS & REQUIREMENTS

- **Rules being changed:** gainful employment and borrower defense. Pell yr-round. Maybe credit hours, distance education, Title IX,
- **Rules to remain till 2018 Reauthorization:** incentive comp, CDRs, 90-10, ATB, composite score past performance, misrepresentation
- **Possible new rules:** loan repayment options, revised loan limits, prof. judgment, **competency based education**, risk-sharing, outcomes
- **FUNDAMENTALS REMAIN: SERVE STUDENTS WELL AND SHOW GOOD OUTCOMES**

Meeting Expectations & Requirements Is NOT Just Getting By



Copyright © 2001 United Feature Syndicate, Inc.
Redistribution in whole or in part prohibited

STUDENTS: FUNDAMENTAL EXPECTATIONS

QUALITY – SERVICE - RESULTS

- **Relevant program** for vocation in **demand**
 - **State of the art** curriculum (key vocational and soft skills), faculty, equipment, LRS, IT (LMS)
 - **Reasonable** academic/support services
 - **Reasonable cost** relative to career earnings in first 5 to 10 years/beyond (BLS-manageable)
 - **Appropriate career preparation/placement services** (exam prep, certification option, job hunting skills/leads): **good shot at job**
- *May think guaranty if messaging is unclear**

EXPECTATIONS & REQUIREMENTS

□ **Great Customer Service:**

- Great customer service: **culture of valuing customer/showing kindness** (Prov. 19:22 “What is desirable is man’s kindness.”)
- Ritz Carlton story: guest left car with ‘ailing’ tire; valet took it to repair shop/got it fixed ‘on the house’ by departure
- Guest’s expectations for Ritz Carlton stay were *far* exceeded.

□ **Reasonable Expectations:**

- Meet/exceed “reasonable expectations” of students
- Reasonable expectations” – from content/clarity in your story
- “Unreasonable expectations” due to (1) no commitment from student/in it ‘for the money;’ or (2) lack of attention to message

MEETING EXPECTATIONS & REQUIREMENTS

OUR AGENDA TODAY

- 1. Programs:** market relevance/value
- 2. Disclosures:** whole story, on record
- 3. Admissions:** criteria/counseling fit
- 4. Fin. Charges/Aid:** clarity fairness
- 5. Student Support** – engagement, attendance, SAP, tutoring
- 6. Career Support** – licensure exams, placement, default prevention

EXPECTATIONS & REQUIREMENTS

1. Program Offerings – Your Product

- ❑ **Context - GE Preamble:** insufficient skills, churn outcomes, unaffordable debt, aggressive spin
- ❑ **Bad PR:** worthless credentials, un/under employment, crushing debt, “rarely” any value
- ❑ **Risks:** bad outcomes, regulatory sanctions, suits
- ❑ **Good Product - Market Relevance:** occupational demands, employer needs, BLS salary - debt (GE)
- ❑ **PAC:** continuing assessment of marketplace needs and expectations - periodically revise programs: curriculum, practical training, length (150% rule)
- ❑ **Faculty:** some adjuncts/visiting lecturers with real world work – ongoing input (accrediting)

EXPECTATIONS & REQUIREMENTS

1. Program Offerings – Your Product

- **LRS/Equipment**: essential equipment and tools reasonably similar to marketplace (accrediting)
- **Government/Industry Requirements**: licensure or registration and certifications (GE, Audit Issue)
- **Metrics**: completion, licensure, placement, CDRs, repayment rates, longitudinal career surveys
- **Surveys**: incoming (expectations)/graduation(satisfaction)
- **Successful Alums**: connected by alumni organization: guest lecturers, value, CE
 - **Your Ideas or Questions??**

EXPECTATIONS & REQUIREMENTS

2. Disclosures – Your Story

- **Context:** eggshell prospect, limited attention
- **Good Process:** checklists, calendar review
- **Bad PR:** Missing/misleading statements
- **Risks:** Reps not giving accurate/required disclosures, PR findings, sanctions, lawsuits
- **Misrepresentation:** tendency to deceive on key point where reasonable student relies. 668.71
- **Mandated Disclosures:** checklist 668.41-.45
consumer: 1)**program** 2)**charges** 3)**outcomes**
 - FERPA, ASR, GE, Rt. to Know, Credit Transfers, TILA: **Lists DOE** 17-18 Hbk, Vol II, Chap 6

EXPECTATIONS & REQUIREMENTS

2. Disclosures – Your Story

- ❑ **Process:** file checklist, signed notices, student surveys on disclosures
- ❑ **Website:** review/update GE disclosures, NPC, textbooks, FERPA; agency contact info
- ❑ **Materials:** catalog, enrollment, orient (drop)
- ❑ **Fact Sheet:** program/career criteria (licensing)
- ❑ **Third Parties:** control content/GE
- ❑ **Approval/Certif.** scope, limits, sanctions
- ❑ **School Loans:** T4 options, other FA, TILA
- ❑ **Outcomes:** document your school/give BLS link

Your Ideas or Questions??

EXPECTATIONS & REQUIREMENTS

3. Admissions – Your Store Window

- **Context:** “Sincere” (Latin no filling/fluff)
- **Risks:** misrepresentation/coercion, incentive comp violations, poor outcomes, bad metrics
- **Bad PR:** inflated/false outcomes, hype, deceit
- **Good Culture:** students win - celebrate them: attendance, GPA, graduation, licensure, plcmt
- **DC Circuit:** counseling for **fit:** understanding program/vocation, readiness and commitment
- **Criteria/Deficiencies:** **if no fit** - decline admission or commit special resources
 - Not only FPs: AR State, Emory

EXPECTATIONS & REQUIREMENTS

3. Admissions – Your Store Window

- ❑ **2010 FP Charges:** students mislead about costs, grad rate, credits, accreditation, jobs, earnings
- ❑ **Process Rules:** NO off-script, hype (last seat); getting signed Fact Sheet and other disclosures; no rush or shortcuts; no bogus HS/criteria
- ❑ **Periodic Training:** culture, process rules, fit, ethics code, regular training, discipline
- ❑ **Annual Memo:** limitations of Incentive Comp
- ❑ **Separate Comp Review:** **process review** & standard evaluative (soft) skills.
- ❑ Keep success management and metrics separate

EXPECTATIONS & REQUIREMENTS

3. Admissions – Your Store Window

- **Process Review:** student surveys (right after admissions), shopping, recording interviews
- **Graduation:** if grad bonus/factor, written policy, no advance pay, maintain academic integrity
- **Marketing Companies:** contract, oversight
- Control/review of content
- All required disclosures (GE)
- Compliance (incentive Comp), indemnity, E&O
- **Audit Guide:** staff turnover, rapid T4 growth, use of success metrics for management
 - **Your Ideas or Questions??**

EXPECTATIONS & REQUIREMENTS

4. Financial Charges/Aid – Your Pay Options

- **Context:** will this fit in my budget/is it worth it?
- **Good Options/Process:** students clearly understand total charges and options to pay
- **Goal:** find a way for student to afford your school
- **All Costs:** outlined in catalog/enrollment K, clear refund policy meeting state law, R2T4 on drop, penalties (hourly charge/lost or broken equipment)
- **Special Prices:** appropriate factor (e.g., vets), written disclosure, fair/consistent application
- **Title IV Qualifications:** clear written policies on POE (HS diplomas, GED), NSLDS check re prior FA, verification process (background/credit)

EXPECTATIONS & REQUIREMENTS

4. Financial Charges/Aid – Your Pay Options

- ❑ **Full FA Range:** cash, T4, state aid, scholarships
- ❑ **SAP Understanding:** not meeting GPA/pace, eventual loss of T4, dismissal (orientation)
- ❑ **Status Change Understanding:** drop course, go to PT or go on LOA and not return: T4 consequences (orientation)
- ❑ **Financial Literacy/Comprehension:** obligation video/course; budget analysis; post graduation budget picture: CFPB's Financial Shopping Sheet
- ❑ **Use of Loan:** confirm if not needed for education
- ❑ **School/Gap Loans:** T4 rmdr, TILA, fair terms
 - **Your Ideas or Questions??**

EXPECTATIONS & REQUIREMENTS

5. Student Support – Your Commitment/Guaranty

- **Context:** service warranty on new iPhone: help!
- **Good Contact:** need service rep who listens, gets answers, points students in right direction
- **Goal:** retention and student success
- **Outline Services in Writing:** what you do, don't do, when there is cost (e.g., transportation, insurance, etc.); goal is to avoid false expectations
- **Referrals on What You Don't Do:** information on and relationships with community agencies and resources (childcare, money, food bank, etc.)

EXPECTATIONS & REQUIREMENTS

5. Student Support – Your Commitment/Guaranty

- ❑ **Academic Support:** mentors, tutors, library, Help Desk (IT), online resources, schedules (PT, LOA)
- ❑ **Drop Aversion:** instructors, mentors, deans, campus director, admissions rep
- ❑ **Complaint Resolution:** should have written complaint process; optional use of 1-800 line or online portal
- ❑ **Ombudsman:** trusted 'neutral' advisor student feels free to bring complaints about instructors or students: academic difficulties, harassment, etc.
Goal: early resolution, avoid legal claims
 - **Your Ideas or Questions??**

EXPECTATIONS & REQUIREMENTS

6. Career Support – Your Partnership for Success

- ❑ **Context:** not a YouTube video - career launcher
- ❑ **Good Partnership:** graduates to career success
- ❑ **Licensure Exam** – prep/support, scheduling, results
- ❑ **Job Process:** interview prep, leads, employer ties
- ❑ **Placement Verif.:** grad follow-up, employer verif.
- ❑ **Post-Grad Help:** early career struggles (instructors), monitor loan performance
- ❑ **Alumni Contact:** online directory, newsletter, association, CEU benefits, guest lectures, job prospects
 - **Your Ideas or Questions??**

EXPECTATIONS & REQUIREMENTS ARE ALL YOURS – IN YOUR HANDS

- **Your Product: Good Stuff**
 - **Your Story: Good Process**
 - **Your Looks Good Culture**
 - **Your Good Pay Options**
 - **Your Good Contact**
 - **Your Good Partnership**
- All add up to **Your Future!**
 - *Doc to Marty in BTFF3: "Your Future is Whatever You Make It. So, Make Sure It's a Good One!"*

EXPECTATIONS & REQUIREMENTS

QUESTIONS???

Ron Holt

rholt@rousefrets.com

Vickie Russ

vruss@bellusacademy.edu

Sally Samuels

compliance@fameinc.com