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Message from Milton

As another year comes to a close, I want to take this opportunity, on behalf of HEAG, to wish all of you an enjoyable and meaningful Holiday season and a Happy New Year. At this time of year, we are all mindful of the less fortunate. It is important to remember, as you all plow through the piles of paper on your desks, that education and financial aid are essential in creating opportunity for the less fortunate. As only one small piece of that effort, all of us at HEAG thank you for your efforts to make higher education affordable to all.

Best Regards,

- Milton Kerstein, President

LETTER TO COLLEGE PRESIDENTS

By James Runcie,
Chief Operation Officer, U.S. Department of Education

September 23, 2011

Dear College President:

As you may know, the U.S. Department of Education (Department) published final regulations on October 29, 2010, requiring institutions that participate in the student financial assistance programs authorized under Title IV of the Higher Education Act of 1965, as amended, to report certain information about students who enrolled in Title IV-eligible educational programs that lead to gainful employment in a recognized occupation. These final regulations became effective on July 1, 2011.

We appreciate that these requirements have generated additional workload for college officials, and we take that very seriously. At the same time, we need to balance those concerns against the need to ensure that students are well served by the federal financial aid programs. The end result of these reporting requirements will be the availability of valuable information to students, parents, and college officials. It will also provide stronger standards that will promote better student outcomes.

On September 26, 2011, institutions may begin reporting the required gainful employment



information to the Department's *National Student Loan Data System* (NSLDS). We will accept institutional data submissions through November 15, 2011.

The gainful employment reporting regulations require the submission of information that likely resides in several institutional offices, not just in the financial aid office. This includes information that may be from the registrar's office, the bursar's office, the technology office, and other institutional offices. We also recognize that these offices may not be familiar with some

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TechTalk Corner: Upcoming Webinar

Direct Loan Reconciliation in Banner will be held on January 13, 2012 at 3pm (EST). See page 4 for details.

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of the concepts, terminology, systems, and processes associated with the administration of the Title IV student financial assistance programs. Because of this, I encourage you to promote coordination among those offices at your institution responsible for complying with this reporting requirement.

To ensure that all institutions that participate in the Title IV student assistance programs have easy access to the most current information on the new gainful employment regulatory requirements and the Department's implementation plans, we established on our Information for Financial Aid Professionals (IFAP) website a special Gainful Employment Information Page: <http://www.ifap.ed.gov/GainfulEmploymentInfo/index.html> This webpage contains resources such as the final regulations, guidance, frequently asked questions, the *NSLDS Gainful Employment User Guide*, and training announcements.

The webpage also contains extensive information on the gainful employment reporting requirements, including data definitions, file layouts, and submission methods, options, and requirements. If your staff has questions about the gainful employment regulatory requirements, we encourage them to review

not only these materials but also webinars that we have presented and that are posted in the Training Section of the gainful employment webpage.

Finally, I would like to note that we recently announced we will be conducting a webinar October 13, 2011, on the gainful employment reporting requirements. Information about the webinar can be found on our IFAP website at <http://ifap.ed.gov/dpclatters/ANN1120.html>. Some of your staff may be interested in participating in this webinar to increase their understanding about these issues.

We appreciate the efforts of everyone at your institution and know that you share our commitment to maintaining the utmost integrity in the administration of the Title IV Programs. Thank you for your continued cooperation.

cc: Institutional Financial Aid Administrator

Sincerely,

James W. Runcie
Chief Operating Officer

GAINFUL EMPLOYMENT AND NSLDS REPORTING

September 26, 2011

Author: Pamela Eliadis, Service Director, System Operations & Aid Delivery Management, Federal Student Aid

Subject: Gainful Employment Electronic Announcement #23 - Gainful Employment Reporting Functionality Now Available on NSLDS

We are pleased to announce that online reporting functionality for gainful employment is now available on the National Student Loan Data System (NSLDS), including the NSLDS Professional Access Web site.

Detailed information about the use of NSLDS for reporting gainful employment data is provided in the NSLDS Gainful Employment User Guide, available on the NSLDS User Documentation page of the Information for Financial Aid Professionals (IFAP) Web site, as well as from the "Resources" section of the Gainful Employment Information Page. Institutions should use information in the guide, most recently updated on September 22, 2011, to submit required gainful employment information to the U.S. Department of Education (the Department).

In addition, institutions should refer to NSLDS Newsletter #34 for supplemental information about the NSLDS gainful employment reporting process. The newsletter discusses the new reporting functionalities on NSLDS and provides helpful tips on gainful employment reporting using the various reporting options, including the NSLDS GE Submittal Template.



As a reminder, while the regulations provide that the deadline for institutions to report GE Program information is October 1, 2011, the Department will continue to accept information through November 15, 2011. This means that institutions have until November 15, 2011 to meet the GE Program reporting requirements without any adverse action taken by the Department.

Contact Information

If you have questions about using NSLDS to report gainful employment information, contact the NSLDS Customer Support Center at 800/999-8219. You can also contact Customer Support by e-mail at nslds@ed.gov.

The Gainful Employment Information Page on the IFAP Web site contains publications and resources on gainful employment as well as Frequently Asked Questions (FAQs). Policy questions that have not already been addressed in the FAQ section of the Gainful Employment Information Page may be submitted to ge-questions@ed.gov.

FREQUENTLY ASKED QUESTIONS ABOUT NET PRICE CALCULATOR REQUIREMENT

In accordance with the Higher Education Opportunity Act of 2008 (HEOA), by October 29, 2011, each postsecondary institution that participates in Title IV federal student aid programs must post a net price calculator on its website that uses institutional data to provide estimated net price information to current and prospective students and their families based on a student's individual circumstances. The net price calculator is required for all Title IV institutions that enroll full-time, first-time degree- or certificate-seeking undergraduate students.

Q: Can colleges ask users to submit information that is not included in the Department's template (e.g., GPA, more detailed financial information, etc.)? Further, can they require users to answer those questions?

A: Institutions can require additional info such as GPA (and other fields that will provide prospective students better estimates of net price) beyond the minimum elements that the ED template does. However, while an institution can ask for contact info, such as name, email address, etc., that is not related to the estimate, it cannot require it.

Q: Can colleges limit access to their net price calculators to students who have applied to the college and have received a special log-in/user number?

A: No. It would not be appropriate to limit access, as the HEA requires this to be available "to help current and prospective students, families, and other consumers estimate a student's individual net price." The statutory language provides that prospective students (students who have contacted an eligible institution requesting information concerning admission to that institution) should be able to have access to the calculator to inform decisions whether or not to apply, and requiring students to apply first subverts this intent.

Q: When and how often do colleges have to update their net price calculators?

A: Institutions should update their calculator on an annual basis when new data become available to do so. Please note that cost of attendance data and grant aid data should align and be from the same year. Institutions using the Department template will need to update their NPC after the Department posts updated versions for each award year. The Department plans to release updated versions in December annually. For example, the Department template for 2010-11 data is planned to be released in December 2011.

Q: Will institutions be considered compliant with the HEOA if they include a link to an outside party's (e.g., a State, a college system, a 3rd party servicer) NPC on their website? Further, if an institution has multiple OPE ID numbers, may it purchase one NPC and provide a drop-down list for students to select a specific campus?

A: The statutory phrase "on an institution's website" provides that students and parents must have access to the net price calculator via the institution's ".edu" URL. An institution may host the NPC on its own website, or it may provide a link to a calculator hosted by another entity, such as the State, as long as that net price calculator includes the data elements required by the federal statute, uses institution-specific data, and clearly indicates that the tool is a net price

calculator. Nothing precludes an institution from using a drop-down list of all of its campuses; however, the estimated cost of attendance that the student receives must be based on data specific to the campus location identified by the student (i.e., it may not provide an average cost of attendance for multiple campuses).

Q: Will the Department "approve" an institution's NPC?

A: The Department does not have an approval process for institutional and State net price calculators. Institutions are responsible for determining that they are in compliance with the requirements of the statute.

Q: Can colleges provide a numerical range for net price instead of a single number?

A: Institutions can output a range of estimates in their net price calculators but must also provide a single point estimate as the Department template does. For example, the institutions could output the 25th and 7th percentile net prices in addition to the median net price. Institutions using the Department template can include a range in the context/caveat section if they so choose.

Q: Are all the inputs in the Department's template required, or can colleges include any inputs to estimate EFC?

A: The Department's template asks for a minimal set of input elements to determine EFC, but since institutions can use their own institutional methodology to determine EFC, they can ask for more information in order to be precise. The language in the statute provides "income, number in family, and dependency status or factors that estimate dependency status" as examples of data elements to be used to estimate an EFC, and we believe that this provides flexibility in allowing institutions to ask users to provide whatever information is necessary for the institution to be able to approximate an EFC.

Q: If an institution has no institutional website, would the school be required to construct one for the NPC, or could it just send notification to students and parents about the availability of the NPC template on the Department's website?

A: Section 132(h) of the HEA states that an institution shall make a net price calculator "publicly available on the institution's website." Because the statute does not make any exceptions for an institution that does not have a website, the institution would need to construct one for its net price calculator. An institution may post the NPC on its own website or link to an external site, such as a State or college system website, as long as that NPC includes all of the elements required by the statute and provides information specific to that institution. An institution may not direct students and parents to the Department's website because the Department's net price calculator template is not functional on its own. It requires a website to host it.

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Q: Are foreign schools that participate in the Title IV programs required to provide a NPC?

A: Foreign schools do not need to develop a net price calculator. (Updated July 2011)

Q: Is there a minimum number of first-time, full-time students for which a Net Price Calculator is required?

A: An institution that has any first-time, full-time students, no matter how few, must have a NPC. If necessary, the institution should consider using data for multiple years of first-time, full-time students in order to make the calculator more robust. If an institution is a graduate/professional school that does not enroll any first-time, full-time students, then it is not required to have a net price calculator on its website.

Q: Where on my institution's website should the net price calculator reside?

A: The HEOA states that an institution must make a net price calculator available on its website, but it does not specify where on the website it must be located. It might be helpful for institutions to refer to a recent report of the National Postsecondary Education Cooperative (NPEC), which includes suggestions on how to make required disclosures more accessible and understandable to consumers. The report is available at <http://nces.ed.gov/pubsearch/pubsinfo.asp?pubid=2010831rev>.

Q: Where will the URL for my institution's net price calculator appear?

A: Institutions provide the URL for their net price calculators in the Institution Identification screen in the IPEDS data collection system (<https://surveys.nces.ed.gov/ipeds>). Net price calculator URLs will appear on the U.S. Department of Education's College Navigator website (<http://nces.ed.gov/collegenavigator>) and Net Price Calculator Information Center (http://nces.ed.gov/ipeds/resource/net_price_calculator.asp).

Q: Is the Department planning to provide formal guidance on issues regarding the net price calculator requirement?

A: We have developed this list of Frequently Asked Questions. We will update this list as needed, and we will consider developing formal guidance beyond that if determined necessary.

Net Price Calculator Help Desk

For additional help related to the Net Price Calculator template and/or requirement, please contact:

The Net Price Calculator Help Desk
(877) 299-3593 (toll-free)
npc@inovas.net.



TECH TALK CORNER

HEAG Webinar:**Direct Loan Reconciliation in Banner**
January 13, 2012 at 3pm(EST)

The Higher Education Assistance Group, Inc. (HEAG) is pleased to announce a webinar scheduled for January 13, 2012 at 3pm (EST). The webinar is free and designed to offer you valuable consulting expertise in a virtual format.

The **Direct Loan Reconciliation in Banner** webinar will focus on the Direct Loan reconciliation function in Banner and the use of Direct Loans tools. Reconciliation can be a long process with many obstacles and this webinar will help make the process easier and more efficient. The webinar will be presented by Ray Nault, Vice President of Information Technology and Compliance at HEAG.

Mark your calendar and join us for this helpful webinar. To sign up, visit the HEAG website at www.heag.us.

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ARE YOU TAKING FULL ADVANTAGE OF YOUR SCHOOL BASED SOFTWARE?

By Ray Nault

*Vice President of Compliance and Information Technology
The Higher Education Assistance Group, Inc.*

We all have these big, shiny software suites that are supposed to make life easier by streamlining day-to-day operations. In reality, most institutions are only taking advantage of the minor features that the software provides, leaving many crucial time-saving components to figuratively gather dust. Whether you are a Banner, PowerFAIDS, Datatel or EDEExpress School, an evaluation of how your team is using your software could uncover some significant ways to save time and money and lessen frustration.

Typically, the best time of the year to start the review process is after all the fall financial aid has been disbursed. This is usually the one time out of the year where you aren't working 90 hours a week to keep up with the ever growing demands and expectations of the parent(s).

The first question is how to start such an evaluative process. We recommend you begin by posting large white papers or whiteboards where your team can track items that either are not working or need improvement. It helps to make sure to have a spot reserved for their "Wish List", no matter how extravagant and to keep these lists going throughout the year so your team can modify it and add to it as your workload evolves. Once you've got a good list going, you can then identify trends and "hot spots" that can be tackled at once. Many

times your software already has the solution. The right module just needs to be engaged to fix things up.

If systems analysis is not your strong suit, then we recommend you consider hiring a third party to help evaluate how you are using your school-based software. You can contact your software developers and contract with them to come out to do the evaluation. This can be very costly and in many cases the developer's consultants focus so much on the product that they don't understand the individual needs of the client. On the other hand, the Higher Education Assistance Group (HEAG) specializes in managing the operational side of financial aid, while blending all the perks of working with the major software providers. Our consultants are former financial aid administrators who have the expertise to help you evaluate your process and maximize the utilization of your financial aid management software.

Further, HEAG's functional consulting role is not complicated with promoting add-on software. Our only loyalty is to our clients. Our services compliment a wide range of products by demonstrating the power and utility of the existing baseline product whether it's SunGard, College Board, Datatel or Department of Education. Our assumption is that colleges will already have chosen the best product that meets their needs. Instead of promoting a product, our sole priority is to help financial aid administrator focus on student and Title IV management.

There is no time more fitting to say "Thank You" and to wish you a Happy Holiday Season and a New Year of health, happiness and prosperity. May the peace and joy of the holiday season be with you throughout the coming year.

The HEAG team

DISCUSSION ON SINGLE SEX MARRIAGE AND ADOPTION

Below was a discussion from Jennifer Fuhrmann (fuhrmann@hartford.edu) that was posted to the CAPFAA list serv. Jennifer asked a question regarding verification for a student that has two moms, one is the biological parent and the other adopted the student. How should this be handled? This has been reprinted with permission from Jennifer.

Date - Oct. 2011

Hey folks. I need some assistance with verification. One of our students has two moms married in MA. Because same sex marriage is not recognized by the feds, we were going to use just the income information from the biological mom. What we've now discovered is that the other mom legally adopted the student (I looked at the laws just to confirm this was possible and it is).

Does the adoption change things? Would you now include the income from both the mothers? If so, how would you record this on the FAFSA?

Thanks!!

Jennifer C. Fuhrmann
Director of Student Financial Assistance
University of Hartford
Bates House
200 Bloomfield Avenue
West Hartford, CT 06117

Here is a summary of the responses:

Use biological mom's information only because regardless of adoption, the feds do not recognize a family with 2 moms.

Use biological mom's income and treat it as if it were a divorce/separated situation.

Use biological mom's information only. Having two legal parents in the same household is no different from having divorced parents that live together. Any money paid on the student's behalf by the other parent could go under untaxed income on the student.

The information for foster care and unaccompanied homeless youth says to include the income information for the adoptive parent. Maybe use professional judgment to combine the income as you would if it were a mom and dad.



Use the mother's income that is the greatest. Referred to this article: <http://bucks.blogs.nytimes.com/2011/10/14/how-to-file-for-financial-aid-if-your-parents-are-gay/?scp=1&csq=fafsa&st=cse>

We are all on the same page in the event it were a straight forward same sex marriage. The adoption is what seems to be causing the confusion. So I did some further research. There is an adoption called Second Parent Adoption. From what I can find, this is the only adoption available to same sex couples. This adoption gives the adopting mom the same legal rights as the biological mom. However, this is only recognized in 10 states and in certain jurisdictions in 16 other states. It is not nationwide.

So this is the decision we have come to. The adoption is not recognized nationwide just as same sex marriages are not recognized nationwide. It is a state by state choice. We are going to utilize the tax information for the biological mother only. The non-biological mother will not be included in the household size as she does not receive 50% of her support from the biological mother.

Here are the links to the information on the Second Parent Adoption if you are interested.

<http://www.hrc.org/resources/entry/second-parent-adoption>
http://www.familyequality.org/pdf/secondparent_withcitations.pdf

Thank you all very much for your assistance!

Jennifer C. Fuhrmann
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About The Higher Education Assistance Group

The Higher Education Assistance Group, Inc. is a comprehensive higher education consulting and financial aid consulting group located in Wellesley, Massachusetts. In operation since 1989 initially as a financial aid consulting firm, we have since grown and expanded to represent all areas of student services management. We continue to advance and evolve to meet the needs of our school clients. The Group provides exceptional administrative and professional management services to all student service fields, including Admissions, Financial Aid, Continuing Education, Bursar and Registrar offices at two and four year institutions, both public and proprietary. The Group's highly qualified team of consultants has spent decades in the field providing administrators with the tools, knowledge and support necessary to complete institutional objectives. We pride ourselves on assisting post secondary institutions to meet challenges such as program regulatory compliance, organizational structure, staffing needs, and technological support.