

NEWSLETTER

SUMMER 2016

VOLUME 8, ISSUE 3

Inside this Issue

- 1 Consultant Spotlight
- 2 Using Behavioral Science to Increase FAFSA Completion

EACUBO Spring 2016 Workshop

3 For-Profits Set For Potentially More Regulations and a Bumpy Road Ahead

Community College Watch Summer Reading

- 4 Compliance Keep Calm and Let Your Stars Shine
- 6 Recap 2016 NASFAA CONFERENCE #NASFAATurns50

Achieve a Higher Standard... with HEAG!

Message from Milton

Summer is a time for relaxation and reinvigoration for many. For the financial aid professional, it is also a busy and stressful time as you prepare for the beginning of classes for the Fall semester. Students and families need to know the amount of financial aid available to them. College business offices need to know how much financial aid is available in order to prepare Fall semester billing. All of us at HEAG wish you a very happy Summer and invite you to call us if we might help make the Summer a little less stressful for you.

~ Milton Kerstein, President

CONSULTANT SPOTLIGHT

Name: **Dr. Erica Holmes**Current Position: **Financial Aid Consultant**

This quarter's employee spotlight is Dr. Erica

Holmes....

What do you enjoy most about your current position at HEAG?

I enjoy the diversity of working with different institutions. Working in culturally diverse colleges and communities has enriched my career over the years. We find in higher education many commonalities; however, there is no one size fits all when it comes to teaching and learning. I enjoy providing consultation and offering professional development to staff that enables them to implement best practices in a manner that is consistent with their mission and values.

What makes HEAG unique or special compared to your work experiences elsewhere?

HEAG creates unique opportunities to work on short-term and/or long-term assignments.

Before working for HEAG, what was the most unusual or interesting job you've ever had?

I worked as a Spanish Translator. While I do not consider myself a "language expert", I had fair command of the language with the ability to understand, read, and write Spanish. After successfully passing written and oral exams in Spanish, I was offered the job with duties of translating company

policies and Occupational Safety and Health Act (OSHA) laws and standards. I gave oral presentations in Spanish and was a translation liaison between management and employees working on agricultural farms.

When you're not consulting, what kind of other hobbies/interests do you have?

We are sports fans in my family. We regularly attend NBA, NFL, and college games as well as games at the local high schools. With that said, obviously, we love to travel. I have a passion for cooking and we host many family gatherings at our home.

You have held many senior positions in small and large colleges. How is your role different now as a consultant to schools?

The roles are similar in some aspects, although the scope may be more concentrated in one area or another. As a senior administrator, I held responsibility and accountability for maintaining compliance and accreditation. No one person does that alone so in some aspects I provided consultation to my teams. I had to lead my teams in the right direction, keep up with rapidly changing requirements, adjust policies, implement workflow strategies, etc. and ensure that my team accomplished the set goals. I have held many of the positions of those I supervised, so I had first hand knowledge of their roles and day-to-day operations. These experiences also are assets in consulting with other schools. I have built a network of professional resources and relationships with government and accreditation agencies.

USING BEHAVIORAL SCIENCE TO INCREASE FAFSA COMPLETION

It wasn't the numbers in the blog post, "FAFSA Non-Filers: What the Research Says," by Paula Acevedeo on the National College Access Network¹ that caught our attention, it was the experiments conducted by ideas42. With at least 2 million students failing to complete the FAFSA every year, ideas42 partnered with colleges to use behavioral science to increase FAFSA completion.

"Behavioral science is the study of how people make decisions and act within a complex and textured world where details matter. We make decisions with imperfect information and do not always choose what's best for us. Behavioral science has been used across a variety of fields to realign policies, programs, and products with how we really behave."²

ideas42 is a global nonprofit organization that uses behavioral science to drive social change.

Increasing FASFA Completion Rates with Emails and Apps

An experiment by ideas42 in partnership with Arizona State University showed that sending targeted emails to parents/guardians and to students about FAFSA deadlines increased the completion rate by priority deadline by 72% over a control group. The emails simplified language, broke the application into smaller steps, sent reminders and showed progress.

A smartphone app used in another experiment flagged FAFSA deadlines. The app helped to increase FAFSA submission for high school's seniors in the San Jose Unified School District by 22%.

Maintaining Financial Aid for Students by Emailing Course Selections

In another experiment, ideas42 partnered with Valencia Community College. Two behaviorally designed emails were sent to students about the impact of their course selections on financial aid. The result was student' aid awards increase by \$150 per student over the control group with minority students seeing an even larger increase.

Improving Efficiency and Student Satisfaction

HEAG's VERIFY uses many of the techniques used in the behavior science studies to improve the verification process. VERIFY is a completely electronic, customized and streamlined remote verification service built to support the needs of students and financial aid administrators. Through a school branded, secure online



Schedule Your VERIFY[™] Demo Today.
Call 617.928.1975 or Click to request a demo.

portal, students can use their smart phones to upload documents to be reviewed by a designated Verification Specialist. HEAG's Verification Specialists send students email reminders and confirmations. Watch our video for more information on VERIFY.

Sources:

1. http://www.collegeaccess.org/BlogItem?dg=8c217bc3fd7f4cbdbae56313ab687967
2. ideas42 Nudging for Success http://www.ideas42.org/wp-content/uploads/2015/12/Nudging-for-Success-ideas42-FINAL.pdf

EACUBO SPRING 2016 WORKSHOP

HEAG was proud to be a part of the Eastern Association of College and University Business Officers (EACUBO) recent Spring 2016 Workshop held at the New School in New York City on June



15th, 2016. The workshop topics included fund accounting, tax update, risk assessment for small and medium size colleges and new rating agency rating methodologies.

Karyn Wright-Moore, HEAG's Vice President for Compliance and Quality Assurance, presented alongside another HEAG Consultant, Jennifer Tonneson Sherman. Together, they offered insight and important information regarding Title IV compliance, focusing on areas considered to be the Top 10 Compliance Findings affecting Business Offices.

So, what are the Top 10 Compliance Findings? We share with you our results below:

- 1. Repeat Findings
- 2. Student Authorizations
- 3. FERPA Violations
- 4. Prior Year Tuition Charges
- 5. Consumer Information Requirements
- 6. Allowable Fees
- 7. Cash Management
- 8. Managing Perkins Loans
- 9. Return of Title IV (R2T4) Calculation Errors /Late Return
- 10. G5 Expenditures Untimely/Incorrectly Reported



FOR-PROFITS SET FOR POTENTIALLY MORE REGULATIONS AND A BUMPY ROAD AHEAD

In mid-June, the Department of Education (ED) announced a new round of proposed regulations aimed at the proprietary sector of higher education. "We won't sit idly by while dodgy schools leave students with piles of debt and taxpayers holding the bag," Secretary of Education John King said in a statement. "All students who are defrauded deserve an efficient, transparent, and fair path to the relief they are owed, and the schools should be held responsible for their actions."

Streamlining Student Loan Debt

Some of the proposals on the table include streamlining student loan debt, similar to a program that the Federal Housing Administration offers for mortgages, and removing so-called "mandatory arbitration clauses" seen in many for-profit school's Enrollment Agreements. Undersecretary of Education Ted Mitchell said in a statement, "By allowing students to bring lawsuits against a school for alleged wrongdoing, the regulations remove the veil of secrecy, create increased transparency, and give borrowers full access to legal redress." The other proposals would also help create group-wide loan discharges when pools of students have been impacted by schools guilty of misconduct. Finally, it would establish baseline

triggers for schools that have violated federal regulations or are proven to be at risk of potentially closing. The school in question would have to increase its typical "letter of credit" from the usual 10% to 20% or possibly higher and notify current and prospective enrollees regarding statistics on students struggling to repay debt at their locations.

Trouble for the Accrediting Council for Independent Colleges and Schools

The issues with for-profit education are now two-fold as their accrediting body has also come under fire. The Accrediting Council for Independent Colleges and Schools (ACICS), with 363,000 undergraduate students under its governance, had a federal panel that oversees college accreditors, de-recognize the council. ED will have 90 days to decide what will happen next to ACICS, followed by potential rounds of appeals and lawsuits. If the courts don't block a shutdown, the 245 schools currently accredited by ACICS would have 18 months to find a new governing body. This process would likely prove to be fairly easy for some institutions, but a struggle for others who may have metrics that are not at the required levels of the new accreditor.

CONTINUED ON PAGE 5

COMMUNITY COLLEGE WATCH SUMMER READING

What's on your summer reading list? Here are some of the things on our list this summer:

State of Denial: Where Community College Students Lack Access to Federal Student Loans

http://ticas.org/sites/default/files/pub_files/states_of_denial.pdf

The Institute for College Access & Success, June 2016

This 20+ page assessment of federal student loan participation at community colleges across the country is a state by state look at student access to federal student loans. It also looks at students' race and whether or not they live in an urban/non-urban area. Default rates were cited as a primary reason for some community colleges to opt out of federal loan programs.

TICAS' Recommendations for Community Colleges:

- All community colleges should offer federal student loans.
- \bullet Community colleges that choose not to offer loans must clearly alert students.
- Community colleges should counsel students before certifying private loans.

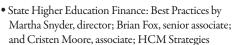
The National Commission on Financing 21st Century Higher Education http://millercenter.org/policy/commissions/higher-ed

A Project of the University of Virginia's Miller Center

The National Commission on Financing 21st Century Higher Education released the first four of ten white papers on different dimensions of the higher education problem.

- Crowded Out: The Outlook for State Higher Education Spending by Dan White, senior economist, and Sarah Crane, economist, Moody's Analytics
- Transformations Affecting Postsecondary Education by Jeffrey Selingo, author and columnist

 Financing American Higher Education in the 21st Century: What Can the United States Learn from Other Countries? by D. Bruce Johnstone, professor emeritus, Higher and Comparative Education, The University at Buffalo





Did Oregon get 'free' community college right? Ask Tennessee http://www.oregonlive.com/education/index.ssf/2016/06/did_oregon_get_free_community.html

Author: Andrew Theen, The Oregonian/OregonLive

Speak Your Piece: As Economy Recovers, College Finances Worsen http://www.dailyyonder.com/speak-your-piece-as-economy-recovers-college-finances-worsen/2016/03/09/11759/

Author: Stephen G. Katsinas, The Daily Yonder

The 2009 federal stimulus package temporarily helped hold down the cost of higher education for America's young people. Now, rising tuition and flat funding for programs like Pell grants put rural students and community colleges at risk, according to a new report.

The Washington Post – Beach reads – summer reading list 2016 https://www.washingtonpost.com/graphics/entertainment/summer-reading-list-2016/

Happy Summer!



COMPLIANCE - KEEP CALM AND LET YOUR STARS SHINE

By: Dr. Erica C. Holmes, HEAG Consultant

At the forefront of education is the notion of accountability. Whether post-secondary or secondary, at times we all wonder why so much oversight and what really is the role of regulatory bodies, accreditation agencies, and the Department of Education? What does it really mean to hold schools accountable for educational processes and achievement?

Just the thought of these questions causes stress and anxiety for many. Instead, you need to keep calm and let your stars shine. Your organizational stars, (outcomes, assessment, success, and accountability), are basically all you need to demonstrate compliance. Sure, this may be a simplistic view of looking at compliance, yet it is a comprehensive view and when presented in an organized fashion, gives any external agency evidence of organizational effectiveness.

The main components in which a school is audited to demonstration organizational effectiveness are: 1) mission, 2) integrity, 3) quality of education, 4) assessment of education and services, 5) fiscal responsibility, and 6) statutory law. Regional and national accrediting agencies have variations of standards, criteria, and assumed practices that can be summarized under these six overarching areas of compliance. With that said, accreditation and compliance are not events where the school's emphasis is put on mass productions of work in a short time period. Meeting accreditation and compliance standards occur ongoing through the day-to-day operation of the school.

Some myths are compliance adds tremendously to the workload, compliance takes too much time, and compliance is very expensive. The reality is, compliance done right, provides opportunities for everyone on campus to showcase their stars, (outcomes, assessment, success, and accountability). Everyone on campus, on a daily basis, works towards some stars (outcomes, assessment, success, and accountability) whether formal or informal. What often falls through the cracks is the acknowledgement of the work and even the awareness of how the work is related to accreditation and compliance. As a result, when the time comes to prepare a report or site visit, "the myths" defined as a widely held but false beliefs or ideas, quickly becomes reality.

Another myth is accreditation and compliance is the responsibility of management. The reality is everyone on campus has a role in meeting accreditation and compliance standards. As aforementioned, defining and acknowledging these roles are often left to chance. Absent an clear plan, the development of events required to document the stars and create a solid body of evidence are likely not going to happen. Demonstrating everyone's role in processes is not as difficult as one may think and can be done using existing tools. As examples, everyone has a job description that list duties and responsibilities. However, very few job descriptions correlate the duties and responsibilities at all levels to mission, accreditation, and compliance. Imagine if they did and if the information was covered in employee orientations and in-service trainings. These would be high impact practices to ensure that everyone in the organization understands how their job helps in supporting the mission and meeting compliance. If any job does not support the mission and compliance, why is it there?

Excerpts from Job Descriptions	Correlation to Accreditation/Compliance Standards
Responsible for collecting, recording, maintaining and reporting of student records within FERPA guidelines	Federal compliance
Clean building floors by sweeping, mopping, scrubbing, or vacuuming them; Monitor building security and safety by performing such tasks as locking doors after operating hours and checking electrical appliance use to ensure that hazards are not created.	Maintains physical infrastructure sufficient to support operations Shared responsibility; maintains physical infrastructure sufficient to support operations
Identify and report possible repairs	Federal compliance
Coordinates the institution's Clery Act Compliance program; develops the institution's Clery Compliance policies and procedures	Shared responsibility; meeting the mission
Assist with the setup of facilities for meetings, classrooms, conferences, events, etc	Provides appropriate academic support services; federal compliance
Compiles and files student grade and attendance reports and other school records Develops and directs a technology infrastructure that supports the academic, administrative and operational functions of the district	Institution's use of technology enhances student learning and is appropriate for meeting the objectives of its programs; institutional planning anticipates emerging factors, such as technology
In collaboration with the dean and department chairs, oversees the development, implementation, and maintenance of cost-effective approaches to budget management.	Institution has a well-developed process in place for budgeting and for monitoring expense
Assists in the development and regular revision of a University-wide educational assessment plan to ensure effective assessment at the course, program, and institutional levels	Institution uses the information gained from assessment to improve student learning
Determines applicant requirements by studying job description and job qualifications.	Staff members and faculty are appropriately qualified



Compliance – Keep Calm and Let Your Stars Shine FROM PAGE $4\,$

As everyone in the organization becomes keenly aware of their role, the myth that compliance is only management responsibility dispels and a more cohesive team emerges. Everyone should be able to articulate and document their goals and outcomes. They should be able to articulate the assessment methods in their areas of responsibility; if in the classroom, assessment of student learning outcomes and academic programs; if in a support or administrative unit, assessment will show how they know they performed well and produced stated outcomes. How well did the services meet the needs of the students and customers? How are departments meeting



accountability? Often, through verbal interviews, faculty and staff boisterously describe the work they do in/out of the classroom and how it prepares students for the future. Capturing this information in a written systematic manner is more of a challenge, but it is being done successfully all over the nation. There are far more success stories than are failures. Keeping in mind the premise for compliance is measuring student achievement and holding schools accountable, every audit and/or site visit yields opportunities for promoting excellence and success holding steadfast to the intuitional commitment to students. With organization and planning, teams can turn the perceived distress and torment of compliance into delight and joy of demonstrating jobs done well. Document your outcomes, assessment, success, and accountability and let these stars shine.

Again, everyone has a role, including students. Students need to be aware of important facts that they control and influence. For example, the college's loan default rate directly correlates with the students' repayment of student loans. If the loan default rate, due to students not repaying, reaches a certain percentage, then the college is at risk of losing program privileges which means future students may not have a student loan program. Students should also be accountable for providing feedback to the college regarding their student experience. Many students do this through participation in surveys and participation in academic program reviews. Students are also responsible for following federal and state statutes and being ethical in all dealings with the college.

Why is it so important to do these things? Perhaps before reading this article your response may have been because "they" said we had to do this to meet compliance standards. However, in gaining new perspectives about compliance and accreditation, a better response would be, "We do this for the success of our students". In your own role, "I do this because I add value to my college, acting with integrity, and producing outcomes that meet compliance and reduce risk". As institutions continuously prepare for future challenges, it is imperative to accept the realization that this is not just the president's job. Everyone has a role and must continue to accept these challenges.

Obviously, the rising academic and administrative standards are fluid with new key indicators and metrics being introduced each year. It is also obvious that in the future, more levels of accountability will be directly correlated with the distribution of state and federal dollars. The fact is, participation in the accreditation process is voluntary and some programs such as participation in Title IV are voluntary. Institutions apply and ask to be a part of these programs and as such agree to follow the terms and conditions of participation.

Please contact us if you would like to discuss how HEAG can help your school meet compliance or accreditation challenges.

For-Profits Set For Potentially More Regulations and a Bumpy Road Ahead FROM PAGE 3 $\,$

ACICS has been under intense political pressure to change their processes after a handful of high profile schools closed while under their governance. They have made reforms, including a freeze on new member institutions, protection on conflicts of interest from the agency's board and creation of a new advisory committee to review its processes and staffing. ACICS leadership continues to fight and believes they will be in compliance with all new regulations within 12 months and are pushing for a second chance. In its staff report and during a recent meeting, the department said it did not believe ACICS would be able to clean up its act in 12 months. "To not terminate their agency would be to sanction egregious behavior," said Gail McLarnon, the department's student aid program manager.

"I don't want anyone to think that this is an evil agency," said Steve Porcelli, a longtime department staffer who wrote the report recommending termination for ACICS. Yet Porcelli and other department staff said recently that ACICS had been too lax and inconsistent in many cases. According to a Government Accountability Office (GAO) report, accreditors revoked the accreditation of just 0.8%

of schools from 2009 to 2014. A combination of the new regulations along with ACICS's current woes could lead to the closure of yet more schools and the taxpayers on the hook for the federal aid that was granted to students who attended these institutions. It will be interesting to see how the entire for-profit education sector shakes out over the next few years and deals with the issues and new proposed regulations at hand.

Sources:

http://www.usnews.com/news/articles/2016-06-13/education-department-proposes-new-regulations-on-for-profit-colleges?src=usn_tw

https://www.inside bighered.com/news/2016/06/24/federal-panel-votes-terminate-acics-and-tightens-screws-other-accreditors

 $\label{lem:http://www.forbes.com/sites/prestoncooper2/2016/06/15/college-accreditors-get-an-f/\#1d2857216f85$



RECAP - 2016 NASFAA CONFERENCE #NASFAATURNS50

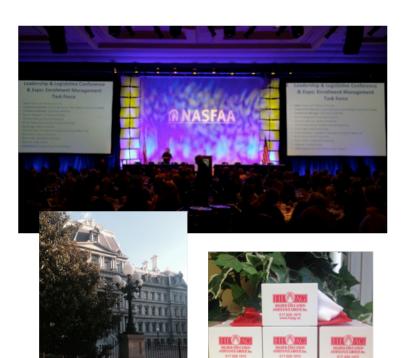
"A Half Century Opening Doors to Educational Opportunity"

July 10-13th, Washington D.C.

The Higher Education Assistance Group was proud to be part of this year's annual NASFAA conference in Washington D.C. from July 10th – 13th, 2016. HEAG joined the



estimated crowd of nearly 3,000 student aid professionals from across the nation to learn, teach and share best practices when it comes to financial aid.







forward to seeing you at NASFAA 2017 in San

We want to thank everyone



Diego, CA!

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.

Telephone: 617-928-1975 Web site: www.HEAG.us Email: Info@HEAG.us

