

*Julie Arthur:*

My name is Julie Arthur. I'm an institutional improvement specialist from the San Francisco Seattle school participation team and I work in Seattle. Presenting with me today is Fran **Sessman**. She's the institutional improvement specialist for the Chicago/Denver team and she's in the Denver office.

Since we both work for program compliance we will be talking about a lot of different issues related to program compliance. I would like to introduce someone to you before we start. Robin Miner, the chief compliance officer for our office is here today. Could you stand Robin? She may get back at me later for this. Thanks.

What we're gonna be covering today are several different topics. The first is regulatory requirements related to the topics, common consumer related findings from audits and program reviews. Then we're gonna talk about external and internal partnerships that we are using to assist in the oversight function. Then we'll wrap up with a number of different resources that you may find useful as you work to comply with the various few regulations that we have out there.

So why is compliance important? Now I think probably at every session you've been to today you've heard these numbers banning about and you may say well those aren't exactly the same numbers that somebody else said, but depends upon what day we pulled the data out of the database.

As of the day I pulled this data, we're looking at \$105 billion from the 2008-2009 year. For 2009-10, almost \$130 billion and that was before the FIS APP data was compiled. We have a lot of schools participating in the Title IV programs. As of last count, over 6,000 schools and that's individual schools with separate OPE ID numbers.

As you can see there's a lot at stake for these programs and so there are a lot of people who are interested in making sure that the funds go to the right students and that schools are properly administering the programs.

The next two graphics give you a little bit of visual on the proportion of schools based on the type of school and how the funding divides out by type of school. So the first one is from 2008-2009, but let's concentrate on the 2009-10 since it's more recent and you can see that approximately 35 percent of the schools participating were proprietary institutions, about 7 percent

foreign schools, public schools 30 percent and private non-profit schools about 28 percent of the total number.

In the funding you'll see that proprietary schools had about 24 percent of the funding. The foreign schools, almost one percent. The public schools 47 percent, which is 61 billion. Then the private non-profit about 28 percent of the total funding at 36 billion. I realize that these are probably a little bit hard to see 'cause we used some \_\_\_\_\_ print, but you can find these on the information that posted to the website.

So now I'm gonna turn the presentation over to Fran Sessman who's gonna talk about consumer information.

*Fran Sessman:*

Hello. Like Julie said, I'm Fran Sessman and I do work in the Denver office. First what I wanted to tell you is what this presentation is not about. It'd be great if we had time to go over all of the consumer information requirements because there are a lot.

There have been a lot of changes in the HEOA and there have been a lot of changes with the brand new regulations, but our focus on this presentation is really about partnerships and what we're doing in program compliance in order to get information about schools and about consumer information.

We are really in program compliance looking closely at what schools are doing with their consumer information. Before we get into the partnerships though we wanna just give a little bit of information about what consumer information is and where you can find it in the regulations.

But first I have a story for you. So this is a story about Julie and Fran. We were at a school and it was a pretty large school in a rural area. So the school said, "Okay, we'll give you a golf cart to get around." We thought great. Julie said, "Oh, I'll drive." I thought okay.

So we take off in the golf cart and pretty soon wham. We hit something. Going oh no. Said, "Julie, you hit a rabbit." She went, "Oh, no, I didn't hit a rabbit." I went, "No, you really hit a rabbit." I said, "You killed a rabbit."

So we turn the golf cart around, get out of the golf cart, look down at that rabbit. Sure enough that rabbit is dead. I said, "Oh Julie, what are we gonna do?" She said, "Oh, not a problem." Reaches in her briefcase, pulls out a little spray can, little silver spray can.

She shakes that spray can, leans over and sprays the rabbit. Shakes the spray can, sprays the rabbit. Pretty soon that little rabbit's nose starts twitching and his little eyes pop open and his ears perk up. Darned if that rabbit doesn't hop up. He hops and he turns around and he waves. You can tell this isn't true.

He hops and he waves. Hops and waves, hops and waves. I said, "Julie, what did you do? What did you do?" So she hands me that silver spray can and I look on the spray can and it says, "Hair spray. Brings dead hair to life." [Laughter] "Affixes permanent wave."

Okay. So not a true story, but there is a moral to the story. The moral is when you're thinking about consumer information, whether you're putting it on the internet, whether you're handing information to your students, putting it in publications, make sure that that information is really good information, that it's something that your students would understand, that it wouldn't be misunderstood, whether you're putting it on a spray can or whether you're giving it to your students personally it's really important that the information you get out to your students is really good information.

So onto consumer information. As all of you are aware or most of you are aware the main consumer information requirements are in 34 CFR 668 Subpart D. If you've been around for awhile you're very aware of these regulations that require certain things that you have to provide to your students, whether it's reporting and disclosure, how you disclose that information, what information you give to the school, to the students about their financial assistance, information about your particular institution, availability of employees to give information to the students, information on completion or graduation rates.

Continuing with 668, again your security policies and crime statistics and a lot of that did change with the HEOA. There were also some new changes if you have student housing. So you'll wanna make sure that even if you've been in the programs for a long time and you're very comfortable with your consumer information that you read up on the Higher Education Opportunity Act changes.

At the end of the presentation, after Julie talks about partnerships I'm gonna give you some information about resources that whether you're a new school or whether you've been in the programs for quite some time how you may be able to go back to your school

and determine do I have everything that I need to update my policies and procedures.

So again, all of the 668 information about athletic programs, if you have those, completion of graduation rates and your fire safety policy, which was new, but it was required that you do this as of this October of 2010 if again you have student house. There were some new requirements on that.

Again, more consumer information. Your drug and alcohol abuse and you probably did that even if you weren't in Title IV because of all of the information that you're required to give students about drug and alcohol abuse prevention.

Of course, FERPA, Family Education Rights and Privacy. Again, like I said, we aren't going in detail because otherwise we'd keep you here for another couple of hours if we talked in detail about consumer information.

Of course, loan counseling. I know right before this session there was a session on entrance and exit counseling, if any of you went to that, but there is some really good information here at the counseling about entrance and exit counseling and some of the changes that might have been made or now that everyone has transitioned to direct loans, the information that's out on the direct loan website and some of the new innovations that they're doing with the counseling.

Then a big one; misrepresentation. There were some changes made to this in 34 CFR. This should say 668 Subpart F. The 668 was left out. The misrepresentation, there were changes to the regulations to strengthen the department's regulatory enforcement authority against institutions that engage in substantial misrepresentation and clarify what constitutes misrepresentation.

The new regulations are intended to make sure that institutions are on notice that the department believes that misrepresentation constitutes a serious violation of the institution's fiduciary duty and that department will carefully and fairly evaluate claims of misrepresentation before determining an appropriate course of action.

Those new regulations are at 668.71 through 75. So I'd highly encourage you to read those because there are some changes to that as far as what we classify as misrepresentation and also what we

can do to a school when we find substantial areas of misrepresentation.

Now what are we finding when we go out to schools and look at the consumer information? Some of the program review findings that we continually find deal with the crime awareness requirements not being met.

A lot of these simply are that your policies aren't in compliance with everything that they should be or that when you distributed the statistics to your students and the policies that either your distribution method was not adequate or that maybe your statistics were incorrect or that you failed to report the statistics on the department's website or maybe you reported those in the incorrect category.

This is really a big one and it is one that you wanna pay attention to because this is one that is fineable; \$27,500.00 per occurrence. So it isn't something that you wanna ignore if you have ignored in the past having to do with crime awareness reporting and all schools, large or small, are required to do crime statistic reporting.

Another thing that we find in program reviews are consumer information requirements are not met. Probably nine times out of ten when we go to schools for program reviews we find that either their policies are not developed or if they are developed they're incorrect. They don't meet the regulatory requirements or the other thing that we do find is they have policies, but what they're doing really isn't reflective of what their policies say or that you aren't providing all the policies necessary to the students.

For instance, satisfactory academic progress. If anyone went to Carnie's session this morning they talked about the changes to satisfactory progress. So even if you have a current policy you will need to be making some changes or possibly to that satisfactory academic progress policy. Return of Title IV is another policy.

New consumer information requirements pursuant to the Higher Education Opportunity Act not implemented. A lot of those are requirements that should have already been implemented and again, at the end of this presentation I'm gonna give you a really good resource that will highlight a way that you can check all of your policies to make sure that if you need to make changes, then you'll know which ones are okay and which ones you need to make changes for.

Another thing that we find in program reviews is misrepresentation, whether it's publication of false information and claims that you couldn't substantiate. For instance, completion or placement rates, incorrect information about your educational programs.

We had one school I remember that gave us a program and said, "All of the students that go to this program and get the certificate can then be licensed to practice in this area." When we did some further checking we found out that yes, they could be licensed, but they couldn't be state licensed and they couldn't actually practice. So that was a real problem for the students that graduated because they couldn't get a job. So you do wanna make sure that you're giving correct information to your students.

The other thing that we do find is information about transferability of credits. You wanna make sure that you're letting your students know whether or not those credits can be transferred and what that policy is.

Now as you're aware there are a lot of new requirements, new regulations. We're not gonna talk at all about these because there are some other sessions that are going through these, but just to briefly mention incentive comp. We took away those 12 safe harbors. So you wanna pay attention to those.

Everyone's favorite topic, gainful employment. State authorization is a component of institutional eligibility. That was a new one in the regulations.

What is the definition of a credit hour to determine program eligibility. Some new things there. Verification; again if you went to Carnie's session this morning she did talk about some of the changes to verification and they also talked about high school diploma definition.

Again, these are all things that the department looked at and said we need to really focus on these because see some abuse from either program reviews or audits or when we're looking at schools. So we wanna really focus in on some of these consumer requirements.

Now Julie's gonna take us through the partnerships.

*Julie Arthur:*

In the next section of the presentation we'll be talking about the various partnerships that FSA has forged with both external and internal partners and the first part of the presentation of this section I wanna talk about some of our external partnerships. These include partnerships with the Federal Trade Commission, or FTC, the Department of Labor, the FBI, the Securities & Exchange Commission with all the accrediting agencies that are approved to accredit schools for Title IV purposes and the guarantee agencies.

The first I wanna talk about is the Federal Trade Commission. The Federal Trade Commission has a number of resources that we found to be very useful in terms of our oversight of institutions participating in the Title IV programs.

They have something called the Consumer Sentinel Network. You may not have heard of this because it's really available only to law enforcement agencies, but we do have access within the program compliance component of FSA. This information records databases of millions of consumer complaints and we also are setting up a system whereby we will share information about complaints we received so that they can be entered into this database as well.

A number of different FSA staff within our offices have access and so they're using this information to research when we are conducting reviews of schools, when we're looking to check out complaints that have been made about schools to see if there are other complaints already in the database. So we're finding this to be a very useful sort of information for our oversight responsibilities.

We've also partnered with the FTC on a number of different consumer information materials. Within that we've put out a number of things and you can find them at our FSA publications website; either print them out or order copies of them.

One of them is one on scholarship scams and it's really talking about looking for financial aid without getting scammed. A lot of good resources there for students. So some of these are targeted specifically to different kinds of students, groups of students who might find it useful.

There are a number of different fact sheets that we've partnered with the FTC to write and these include things like being an informed consumer and also don't get scammed on your way to college. We've tried to make sure that the references are included

that would allow students to contact FTC resources, as well as our resources to make sure that they have the best possible consumer information as they're going through the college selection process and looking for external forms of financial aid.

We also have a couple of other guides and publications that we've co-authored with the FTC and you'll find those all on our FSA publications website.

Another partnership that we've been working on is one with the Department of Labor. The Department of Labor maintains the occupational titles dictionary, which is what we use to define what a recognized occupation is in terms of gainful employment.

The Department of Labor has a very interesting website. It's called Career One Stop and that website includes links to the references related to recognized occupations. It also has a lot of information about expected outcomes for education and careers, salaries and benefits based on national averages, required education and training for various careers, as well as references that will lead interested parties to regional economic development access.

Some of you probably have one stop shops on your campuses that are part of the Department of Labor's outreach for the unemployed. A lot of what we've done is try to work with the Department of Labor to make sure that we have information about what their resources are and that the people who work in their one stop shops have information related to federal financial aid resources that would be of use to people who are trying to get back in school, retrain for a new career or to enhance their employability options.

We also have a partnership with the FBI. The FBI partnership relates to our campus security reviews. Part of what we've done is to partner with them so that we can provide additional oversight and that they can provide us with information about the requirements.

So the whole goal in all of this is to make sure that our campuses are safe for students, that the employees who work there are also safe and that information is provided to the consumers of the education so that they know what kinds of issues may be there and what they need to be careful about. All of this relates back to the Clery Act.

We have a number of different kinds of initiatives that we have undertaken and one of them has to do with focused campus security reviews. The FBI each year selects certain states for what they call a quality assessment review. There's usually about 12 each year. Then they select a school that has a sworn police department because they're looking specifically at records relating to uniform police officers at schools.

We then will also do a program review from our side of the house looking at campus security at either the same school that the FBI is visiting or another school in that same state so that we're looking at the state that the FBI has selected for assessment review.

What FBI is looking at is a little bit different than what we're looking at. The FBI is looking at the most recent reporting of what we call Part 1 crimes or actually what they call Part 1 crimes. This has to do with the uniform reporting of crimes.

So the Part 1 crimes are aggravated assault, forcible rape, murder, robbery, burglary, arson, motor vehicle theft and then larceny theft. Larceny theft isn't one of the ones that's reported for the Cleary Act.

Federal student aid when we do a program review that's a focused campus security review, we're looking at the policies that the institution has in place, such as what Fran was describing for campus security, as well as the most recent statistics have been reported to add on the website.

Our review is looking at Part 1 and Part 2 crimes, as well as disciplinary actions. So for Cleary reporting the Part 2 crimes that are included are non-forcible sex offenses, weapons violations, drug law violations and alcohol law violations. So you can see there's a little bit different focus on each of these, but we have found this to be a useful partnership.

We do share information with the FBI as well as they share information with us. The FBI quality assessment review report is attached to FSA's program review report in the cases where we both have selected the review of the same institution and our program review report is going to reference any findings that were in the FBI review.

This next partnership is with the Securities & Exchange Commission, or SEC, and this relates specifically to institutions that are publicly traded. So obviously this isn't all of our schools

by any means and we do share data and information with the SEC. We have been working with them and talking with them about ways that we can make this a more seamless operation.

We do make complaint referrals and receive complaint referrals from the SEC Enforcement Division related to the publicly traded institutions.

We also review the SEC actions that have been taken against publicly traded institutions that have been reported through the Lexus Nexus database. We review the SEC quarterly statements to make sure that we are taking into consideration any actions or activities that have taken place that could affect the administration of Title IV aid.

We have a lot of different contacts that we've developed with the various state governmental offices and this is anything from the Attorney General's offices, the Assistant U.S. Attorneys through the entities within the various states that are required to license institutions of higher education and post-secondary institutions and we work with all of these different entities and agencies in order to make sure that we're sharing information and coordinating our oversight activities.

Because there is so much information out there related to institutions, we really have found these partnerships to be invaluable. So when we're working with like the Attorney General's office, that's usually in cases where there's some kind of problem that leads to some kind of prosecution.

The Assistant U.S. Attorneys, those kinds of cases come about after there's been an investigation by our Office of Inspector General.

The licensing is key to making sure that the schools are properly licensed and therefore eligible for Title IV because part of our, as you know anytime that you're applying for recertification or you're adding new programs or locations, we require the approval of your state agency responsible for such actions and we do work with the higher education entities within the states for the same kinds of purposes.

Many times we have received referrals from states related to schools either because of student complaints or other kinds of issues that have taken place and there have been times when we have done joint reviews with some of their oversight bodies as

well. So it's a very important relationship that we've maintained over the years and we continue to develop.

The accrediting agencies, and this would include both the regional and national accreditors that are approved for accreditation of Title IV institutions. We share final outcomes on any of our actions with them, as well as they are required to share the same with us.

I did have an interesting case. I work a lot with schools that are applying to first participate in the federal student aid programs. I had one school that had sent me their letter of accreditation, which is required as part of the application, but they hadn't sent me any of the attachments.

I called and I said, "I need everything. I need to know what all the conditions are that are listed in the attachment." They said, "Well that's none of your business." I said, "Well actually it is and if you don't tell me, your accreditor would be happy to tell me."

So we really do share information and there aren't really a lot of secrets between us and the accreditors. I'm sure there's probably some out there, but we do coordinate with the information gathering activities.

If we have a concern frequently we'll call the accreditor and just talk to the accreditor about any information they may have about the school that's more recent than our information and they provide us with updates on all the actions that they take related to school eligibility, approving new locations, putting schools on show-cause or putting schools on probationary status. All that information is information that we take into consideration on the program compliance side of the house.

A lot of what we do within program compliance has to do with institutional participation and eligibility because we're the same people who are approving that additional location that you want to add or that new program that you want to add. So making sure that we're coordinating with the accreditation side of the house is what makes it possible for us to have enough information to make some of these decisions.

Guarantee agencies; we have had a long partnership with guarantee agencies. Currently guarantee agencies are still conducting program reviews of schools. They make referrals to the Office of the Inspector General for add as well as to our program compliance regional offices.

There is a lot of discussion going on now as to the continued role of guarantee agencies, but this is a partnership that we will continue to work with the guarantee agencies in any way that we can.

In addition to having established all these external partnerships, we have a lot of internal partnerships. We have a number of different functions within the Department of Education and within federal student aid. We look to the resources internally to get the information we need to be able to determine when more specific oversight or review is required.

The business operations reporting concerns offices; this includes COD, CPS, NSLDS, all those systems. This was invaluable. We had to work very closely with the program compliance side as well as with business operations in the direct loan transition.

We get a lot of data out of these systems in terms of reviewing to see whether or not a school may be subject to a review. That information comes from a number of different databases. As you know we don't have one single integrated database although we dream of that.

We have a lot of information that goes through the Office of Post and Secondary Education in Ed. They handle everything related to **iPeds**, which all of you enjoy completing those reports I'm sure immensely or if you're lucky your registrar does it.

They also handle the reporting for the campus security systems.

The Office of the Inspector General is kind of like our internal law enforcement. They receive referrals from us as well as referring cases to us for resolution. We have the Office of the Inspector General has two main areas; the auditing branch and the investigations branch. We receive referrals from both sides of the house.

We also on occasion will make referrals to them for what we call quality control reviews of auditors. It sometimes comes to our attention that audits may not have found everything that they should have and as a result we may have some concerns about the abilities of the auditor to fully comprehend the Title IV regulations. So we may refer the auditor to the Office of the Inspector General for a more detailed analysis.

The program compliance teams are responsible for resolving any OIG audits. So if a school has the OIG audit team on campus and sometimes they're there for a very long time. They usually stay longer than we do. Then that would be referred for final resolution and working out the final details to the program compliance group.

We also work with the OIG's office on extensive data analysis. They frequently will ask us to extract data from our database for them to analyze. Then we work with them on interpretation of that data.

Another office within the Department of Ed is the Office of General Counsel. The General Counsel's office, they're basically the lawyers for the Department of Education. They handle anything related to a **key tem**, which is basically a secret allegation that's resolved without any public announcement until the very end.

There are a number of different cases where we'll contact the Office of the Inspector General so that we get advice on a best course of action and on the legal grounds for actions that we may be taking to make sure that we have all of our ducks in a row.

At this point that's summing up our different internal and external partnerships. I'll hand it back over to Fran who will give you some really cool resources that you can use to stay in compliance.

*Fran Sessman:*

I promised some information about resources that you can use when you get back to your school, but first I have another story for you. However, this one is true so it's not quite as funny.

I work a lot with new schools. Julie and I both work with new schools a lot and the very first question they usually ask us is, "So is there a checklist somewhere that we can just have that tells us everything we need to do?" I say, "No." Then their next question after that is, "So what exactly do I do for Constitution Day?"

So, I didn't know. As you're probably aware the Department does not have regulations or even anything in the handbook that says what you must do. Only that you need to do something every year on or about Constitution Day.

So I thought okay, well let me check this out for new schools. So I went to my BFF, Google and I typed in Constitution Day. It's amazing how much information is out on the web. I looked at a

number of school's websites and I really congratulate a lot of you for doing some really creative things for Constitution Day.

There's a lot of good information out there and one website I found it had quizzes. So I thought okay, I've been out of school for awhile, quite awhile. So I'm gonna take the quiz and see how much I know about Constitution Day.

So I go through the quiz, I'm taking the quiz. I'm thinking okay, I'm doing pretty good. Getting a good many of the questions right; missing some, but I thought okay, not a problem. So I go through the quiz, complete the quiz and I'm feeling pretty good about my answers because it tells you what the answers are as you go through. I thought okay, I did really good.

Then I get to the bottom of the quiz and it says "This quiz is rated for fifth graders." [Laughter] So, okay, I am not smarter than a fifth grader as it has to do with Constitution Day.

But getting back to the resources, there really are a number of really good resources out there for you to use when you get back. The one that everybody's familiar with is of course of FSA handbook. Every year when we publish it it's usually in Volume II Chapter 6. It will describe the requirements for consumer information a school has to provide to students, the department and others and it contains a summary of the effects of misrepresentation of school information on the school's participation and federal student aid.

Now the '09-'10 consumer information in the handbook was really pretty good because it told you what changed with the HEOA. So if you go through that handbook and I know you can't see this as I'm holding it up, but when you go through that handbook it will have little new icons. So if you're a school that's been in Title IV for quite some time and you're feeling really comfortable with your consumer information and you just wanna know so what do I need to update because of the HEOA.

Well you can go to the handbook and it will have that new icon that says okay, this is new. You might wanna pay attention because this is some new consumer information that you need to give to your students or this change. So it is one good place and that again was the '09-'10 handbook.

Now one thing that I really, really like and I don't know how many of you are aware of this, but it's called the Information Required to

be Disclosed under the Higher Education Act of 1965. This is the website where you can go and get a copy. It's about 60 pages and if you print it front and back it's really not that thick.

It's an excellent publication and the Department of Education was part of the process in developing this document. There are a number of things that I like about this document. First of all it starts off and it gives you all of the citations for the law, for the regulations, for various places that you can go if you wanna read more about it.

The second thing it does is if you're a new school or even if you're a school that's looking to change some of the way that you're giving out your consumer information, it tells you okay, these are some of the categories that you might wanna put either on your website. These are some categories if you were doing it in print form. So it gives you a template to get started.

Then finally what I think is one of the best things about this document is there's a chart. So again, whether you're a new school starting out or an existing school that you just wanna find out am I doing what I need to do, you can go to the chart and first of all, it will tell you the subject area and this is just one that I put up on a slide.

This happens to do with the refund policy. It says okay, the subject area is the refund policy. Well does this requirement apply to me. Well, it says if you participate in Title IV, yes, you have to have a refund policy.

Now what is the requirement? Now it's gonna list is it in the law, what are the regulations. The thing that I really like about it, again, if you're an institution that thinks that you have your consumer information, but did I make all the changes I needed to. It will tell you if it was changed by the HEOA.

So if you're really comfortable with what you already have, but you're not quite sure. Well I know there were some changes to the HEOA, but did it change this particular policy and do I need to change this particular policy. You can look at this chart and it will tell you. Yes, it did change or if there's nothing, then it will just say it wasn't changed or it won't have any information. It will also give you the regulatory site. So in your spare time you can go and read all of this information if you so choose.

Then it says, "How do I have to disclose it to my students or my staff or however?" This particular one says you need to make it available through appropriate publications mailings or electronic media.

Then it will give you a little bit more information down below. This one says, "You must make it available to perspective and enrolled students. What information is it." But it takes you through all of the consumer requirements and it gives you this information.

We use this a lot now with new schools that are coming into the programs because when they ask for a checklist we don't actually have a checklist, but this as close pretty much as we can come to all of the consumer information requirements.

Now it does not have the new information as far as what's come out in the new regulations, but again a lot of that isn't required yet. So hopefully either this document or another document will be updated, but again, I really highly encourage this document because it is something that we use a lot and think highly of it.

Let's see. Another document and there is an entire session on this and this is the FSA assessments. Have any of you – I don't know if you wanna raise your hand or not or if you care, but are any of you here using the FSA assessments to help you with your policies and procedures? So we do have a few people raising their hands. So you're familiar with it.

There is a session just on the FSA assessments and again, this is something that's on the Department's website and it was developed by our quality assurance group. It's an excellent tool again, whether you currently have policies, you're rewriting policies or whatever, but it's a self-assessment tool that you can go on the website, download a module and it will help you in evaluating your policies, processes and procedures. There are a number of different areas. One of those areas is consumer information.

Again, this is the actual website where you can go, but you can also always access it from the IFAP website, the Information for Financial Aid Professional website.

If you go to the FSA assessment website this is what you'll see. This is the main screen. You'll notice, if you can see it, that is pretty big, but I know some of you over here may not be able to

see the whole screen, but there are different areas. There's an area on students, schools, managing funds and innovations.

If you go under schools you'll notice that there is a link to consumer information. So again, just another really good resource if you wanna evaluate your particular policies to say are they in compliance.

Again, this website has been updated so that everything about the Higher Education Opportunity Act, all the changes that were made by that and there were many, are on this FSA assessment.

So again, if you go to the consumer information, this is the screen that you will get and it will give you an activity bar. It will list all of the information, general information, drug and alcohol, consumer information, student right to know. So you can go down the list.

The one thing I will caution you on FSA assessments is they can get a little overwhelming if you try to do everything at once because when you click on one of the links and it takes you to another link and pretty soon you're at another link and then you forgot where you started. So if you wanna use these I'd say go to the FSA assessment session that's here or start out small and just do one.

For instance, consumer information and get comfortable with how you actually go around the various links because you can go to everything here. You can go to the regulations that will link you to the handbook. Pretty soon you'll be reading in the handbook and then you'll forget now where was I in the assessment, but it's really an excellent link because it has worksheets on well who should be involved in this.

If you have trouble at your school getting other people other than the financial aid office involved in helping you write policies and procedures, it's a really good worksheet that says now wait a minute, how many other people really need to look at these policies and procedures and who else can I get involved to help me with this because as we know, financial aid is not just a financial aid director's responsibility. It's the entire institutions. So it's a good way to let the president, to let everybody else at the school know hey, you're involved in this, too, and here's how the policy affects your particular place in the institution.

A change on this slide. There is no longer Session Number 27. So you can forget that one. But again there's the FSA assessment. Student loan consumerism is Session Number 32. If you wanna find out more about program reviews and the findings and they'll talk about yes, consumer information is one of the top ten findings, whether it's in an auditor program review. That's Session Number 38.

There are a lot of other sessions. The session that Carnie did this morning. I think Sessions 25 and 26 had to do with the new regulations. So they'll be talking about a lot of the new consumer information things that you need to take care of. There are definitely some more sessions that are really good on consumer information.

The other thing we wanna leave you with is contact information. I know this is really pretty tiny, although that's an awfully large screen out there. This is the information about all the school participation teams. If you have questions about developing your policies and procedures, need assistance you can certainly contact any of these people.

I'm not gonna go through all of them, but now you have that on the slide and again, you can always download these slides.

That's pretty much everything we have on consumer information. If you have any questions about this particular presentation we have Julie and I's information on the slide. If you have any questions for us about the presentation Julie will be glad to answer your questions. *[Laughter]*

If you don't have any questions, have a great afternoon. I know we still have time out there. You can go out and get warm. I thought about auctioning off my fleece jacket that I brought from Denver because it was snowing when I left Denver. So I had to dress warm. So have a good afternoon. We'll stay up here for awhile if you have any questions for us. Thank you. *[Applause]*

*[End of Audio]*