

David Bartlett:

And welcome to the foreign skills question and answer period. We have staff here to be able to hopefully answer all of your questions. We have staff from our policy divisions, and we also have staff from our operations division, NSLDS, COD, and be able to help you with those systems type questions or operational style questions. I'm David Bartlett, training officer out of our Kansas City regional office, and I'll be moderating the session. That doesn't mean I can answer any questions, but I'll be giving the questions to the right person to be able to answer for you. So we have a couple folks that are going to help us out by carrying microphone around the room to be able to let you answer, ask your questions.

That way, we can be able to hear all the questions, and everyone in the room will get to hear the questions. As you can tell, our room is nice and spread out, and so if you're asking a question over here, it's very likely that people on the other side of the room will not be able to hear you, including our experts. So does someone want to kick us off by raising their hand and get us started? All right, our first question person.

Audience:

I just – I was talking to I think her name was Anita yesterday, and I just want to make sure that I do understand this before I go back and make the changes. And it's about the cost of attendance we use when we're determining financial need. In the past, we have always mimicked our own government student loan program and used a cost of living based on the family size. So my understanding after talking to her yesterday, we can't do that, and we can only use the student's cost of living alone, and not for spouse or children.

And I want to know if that's the same for the plus loans as well, and is there any chance of using any kind of professional judgment, I guess. Because when they're coming to Canada, their spouses, they can't work. So they won't have any income or anything to support their families. So they've been using this to cover their family's cost while they come to school.

David Bartlett:

Okay, the question is about structuring your cost of attendance and how that would be structured. Correct?

Audience:

Yes.

David Bartlett:

Which one of my panelists would like to have that? They're consulting.

Audience: Okay because this is going to be a really, really big change for a lot of our graduate students who are bringing their spouses and kids with them, and now we're going to tell them they can't get that money anymore, and what they're going to do.

David Bartlett: All right, and we – Barbara, do you have a mic we can give for Jeff? All right. Gotcha.

Jeff Baker: Yeah, I think we understand the question, but clarify it if we don't. So the cost of attendance is the student's cost of attendance, and obviously, tuition fees and institutional charges, they have books and supplies and participation. But meals and housing or the living is for the student. Many years ago, many, many years ago, the cost of attendance could include, for instance, if the student married or had two or three kids, higher costs for them. But that would, in effect, be providing student aide for to support the children or the spouse. That's not allowed. Now what tempers that a little bit, though, is to the extent that we're calculating an estimated family contribution, which would affect subsidized direct loans for you folks, there's a family sized offset, and we want to get into the whole theory of how EFC is calculated, but there's a family size offset.

That's why the FAFSA asked if the applicant is dependent or independent, and let's say they're independent if they're married. And if they are, whether they're married or not, do they have other dependents? Because that's built into the need analysis for EFC. But the cost of attendance is for the student, just the student, which means that for a student whose EFC makes them ineligible for subsidized aid, to be specific, there's not going to be extra money to provide a direct loan to support the spouse or the kids. That's not what this aid is for. It's for the student. So your understanding, if I understood the question, is exactly right.

It has to be changed. Now professional judgment. Professional judgment is a tricky thing. The law allows financial aid administrators, including those at foreign institutions to make adjustments on a case-by-case basis to anything affecting the calculation of EFC or to cost of attendance. That's a case-by-case basis. We're not allowed to regulate on that. But we have given guidance, and I think the guidance would play here. You cannot use professional judgment to undo something that's in the statute that you don't like. I don't mean to be rude, but that you prefer to be something else.

You can't just automatically say, "Okay, the law says it can't include the cost for these kids, but I'm going to do it and use professional judgment. Check the right boxes." You can't do that. They have to be a very special situation why for this family, you're going to treat that one different than generally all of the others. So your understanding was correct, and you do need to go back and make those changes. Okay? But they have no income. How are they living? That's the point. And as tough as it may sound, that's the point. These programs are not designed to provide, in this case, loan funds, or for the rest of the schools, even Pell Grant funds to support other family members. They're for the student.

David Bartlett: Thank you. And the speaker was Jeff Baker for our policy group. Yes, ma'am?

Audience: I have a question regarding –

David Bartlett: I'm very sorry about that.

Audience: Hi, everybody. How are you? I have a question regarding EFC. I have spoken with a number of people, and it appears, especially when we were in our introductory session yesterday, that there are a number of us that are new, including myself. What I would like to know is how we go about calculating the information that comes from the EFC. Now I know this is reported from their FAFSA when they file, and it then is automated into their SAR and ISIR. And then we use that EFC to calculate some need for staff and wellness. Beginning next year, that won't be an issue. However, for students that apply with me now, what I want to know is what should their financial contribution be to their education? Because EFC is used as a quote unquote guideline, which leaves room for professional judgment.

But the EFC has strictly stated that this is what they bring to the table, so how do we determine what they should pay as part of their educational cost, and then what we should certify in loans?

David Bartlett: Thank you very much.

Jeff Baker: Before I jump in on that, what did you mean when you said it won't be an issue next year?

Audience: [*Speaking away from microphone*]

Jeff Baker: Oh, I'm sorry. You're – okay, right. Right. So you're right. The Expected Family Contribution, the EFC, is calculated from data

that the family, the student, or the – in your case, they were all independent students, but in other cases, perhaps dependent students. And the families put it in the FAFSA. It's run through a statutory mandated formula to calculate expected family contribution. But I think part of your question may be something that frustrates all of us. It's the wrong name, and we've been actually looking to have it changed. It's an index. It doesn't mean that that family is supposed to come up with those dollars. It just is an index to determine what federal student aid they're eligible for in the case of foreign institutions subsidized or non-subsidized.

So how much of family or student – one of your students is expected to contribute is not anything covered, how much are they expected to pay towards their education? It's not anything that's really these programs are designed to evaluate. It sounds like we are when we have a concept like Expected Family Contribution, but it's just a number to – an index, as it were, to determine if the student is eligible for a Pell Grant program, or in the case of for foreign schools, a subsidized loan. Cost of attendance minus the EFC, minus other aid. If there's still something there, that's subsidized. Unsubsidized, it doesn't matter. So maybe I didn't get the question, but there really isn't an answer to the question of how much should a family contribute.

If they want to go to school – I mean say it kind of roughly. I don't mean to be rude. Whatever the evaluation comes out of how much loan they can get, whether it be subsidizing, unsubsidized, or just unsubsidized either because their EFC is higher or it's next year in your case, that's all the federal aid – US federal aid that's available. How they're going to finance the rest of their cost is something that we kind of stop there because all we can do is provide the US government federal aid. And I'll repeat the question.

Audience: They want the financial aid process to be a negotiation, and for us –

Jeff Baker: How many of you have law schools? Because they really want to negotiate.

[Laughter]

Yeah, it's not – federal student aid is non-negotiable. It's a formula.

Audience: That's what we're really faced with. I mean is there a _____ [*not speaking into microphone*].

Jeff Baker: Yeah, I don't know that. I mean maybe your colleagues over the next day or two can help you with that. If there's no other aid coming from other sources – scholarships, someone from your country's programs or whatever, and the cost through this and the institution isn't going to give something, and it is what the difference is. And if they need to pay out of their own pocket or borrow from some other place, that's unfortunate, but that's the way it is. But also, my same response about professional judgment. Be careful here as well.

Just as I said, you can use professional judgment to change cost of attendance, response to her question. Cost of attendance items. You can't do anything across the board. It has to be very special. So the same thing here. A student wants to negotiate their EFC so they can perhaps get more subsidized loans. In your case, one more year, but for other people who would have undergraduate – that's not negotiable. It's there's something special about that circumstance. The EFC was calculated, for example, like for next year, the 12, 13 year. There's going to be based on a 2011 income. Where we see professional judgment a lot is especially unfortunately with this economy where families come in and say that was based upon 2011 income, but there's been – I lost my job, or my father lost a job or a spouse lost her job.

Make a professional judgment. Negotiating – there's a whole lot of literature about how these consultants tell families, in the US at least, to when you get your financial aid offer from your school, particularly you get it from multiple schools, go in and negotiate a better package. That's about negotiating institutional aid, and those schools that have institutional aid decide if they want to negotiate or not. Do they really want that student? There's something special about that student or whatever, but there's no negotiating in federal student aid. The formulas are the formulas. You have a little bit of leeway with professional judgment. Yeah, what Danny is reminding me is generally because at least we think about it is the federal dollars – the US federal dollars are the first dollars into the program. So anything that somebody needs to finance the rest of their cost, they can negotiate with anybody they want, but not on the federal aid.

Yeah, this is **Pierre Miranda** and Dan Madzellan from our Office of Postsecondary Education, and they're shy. Yeah, right. No, _____ reminded me of unsubsidized loans is tricky. Not only can it be for

the amount above expected contribution. It can cover the expected contribution. So that's one of the things that unsub loans do, so that's why the formula for a subsidized loan is cost of attendance minus EFC minus other aid is eligibility for subsidized loans up to the annual maximum. For unsubsidized loans, you kind of throw away the EFC. It's cost of attendance minus any other aid, and that's unsubsidized loans.

David Bartlett: And however, I'm going to add a caveat onto this one. However, if you've already given them or awarded them the max-unsubsidized amount, there's no more unsub. We're up to the annual limit that they can take from.

Jeff Baker: Yeah, that's a good point. There are maximums for subsidized, and then there's a total maximum. So if the student already got the subsidized up to the max, and then where EFC counted, but they're still relative for the maximum, and then got the rest of it, the rest of the amount in unsub, there's nothing – you can't go and replace the EFC there because you're already at the annual maximum.

David Bartlett: Thank you.

Audience: Hi. My question is regarding the dear colleague letter that came out on the 23rd of November regarding students – regarding if we don't validate our own degrees, is that we may not be eligible to stay in the program. My question to you is is there anybody here that can explain to us how you came to this decision, and two, why there was no consultation, and also, the impact it's going to have on the students.

Jeff Baker: Maybe you can summarize the question.

David Bartlett: All right. The question is regarding the new dear colleague letter that just came out on the 23rd and related to schools that are not confirming the credential to the students. And the question is basically how did that come about, why did that come about, and the potential consequences and impacts upon the students as a result of that. Did I summarize all of –

Audience: You did.

Jeff Baker: Yeah, thank you. I'm sorry. I didn't hear. I believe the letter explains – tried to explain, at least, that this is the base – the basis of an institution, any institution awarding – being eligible to award federal student aide is that the institution awards a degree or credential. Any institution, domestic or otherwise. When we

wrote the foreign school regulations, we wrote some of them – we emphasized that point. What this letter does – it doesn't provide new policy. It attempted to explain something that was already there. At least we believed it was. Maybe not as clear as it should have been, and that's fine. We've had the question asked for us over the last months or so, and so the dear colleague letter, GEN-1120, I think – the last one, just clarified that like any institution, you can't – the institution is not eligible for US federal student aid if the institution doesn't offer a degree or credential.

In terms of consulting, the statute in the congress consulter doesn't consult, you know, is the basis for the. The regulations went through a negotiated rule making process, which included representatives from foreign institutions and foreign institution associations. So I guess – and I'm not trying to be defensive. The letter was not some new policy that we just developed without consultation and without a lot of thought. It just was a clarification that we felt was needed because of some of the questions about what the regulations and the law already provided.

Audience:

Can I ask then why is it – at the moment, it's we heard this yesterday, and the letter came out on Wednesday, but we heard yesterday when we arrived. This is the first that we're hearing about, and we have to go to back to London and tell our students they can't come next term.

Jeff Baker:

Well, I appreciate that, and it's part of your earlier question of what about the effect upon students and families, and we're not insensitive to that. What we are saying is that this clarification was required because we received enough questions about this issue and we came across enough cases where the school is not awarding the credential and so on. And that happens in our world that the law says something, we attempt to explain when laws change, we do regulations, attempt to explain it, but not everyone gets it, or we didn't explain it as well as we should, and that's on us.

But we just can't let it keep going. So we use the dear colleague letter process to remind people and provide a little more clarity about what these requirements are. But again, the letter does not make policy. The letter describes what already existing statute and regulations require.

Audience:

So for the last ten years that we've been in the program and we've got a zero default rate, we're a specialist school, along with a lot of other specialty colleges, I suppose. But you know, you could close the institution, for one, and two, we've got not that many students.

But you're talking about students who have taken on a program. They started in September. They've taken on a two year program, and we've given them one-term's disbursement, and then I have to go back to them now and say, "You can either carry on for the next year, or cut your losses and go now," and refund the money.

Jeff Baker: Well, I don't think I'm going to –

Audience: I mean we do it for two degrees that are validated by a university. You're saying the university is not a good university or not recognized?

Jeff Baker: I'm not sure I'm going to satisfy you with my responses, and I say that with all respect. The law says that an institution that stayed in our program has to offer these – has to offer the credentials. The regulations say that. The fact that for ten years or so, as you said, things have been different. Maybe that's shame on us that we didn't know that, but the fact is that you cannot award federal student aid to a student in a program unless that student is working on a credential that's going to be awarded by that institution.

I was just double-checking with colleagues here – are you sure on that? We have a general rule that for any time a foreign institution loses eligibility, or in this case, a program, the students already in the program can get one more year's worth of the direct loan, so that mitigates it a bit. It's not enough, I'm sure, but it mitigates it a bit. But this isn't new. It's just maybe new to some people, and again, maybe we should have notified people years ago about this. I guess we assumed – not I guess. We assumed that these institutions are non-US institution colleagues. We're offering the degrees, and maybe that's an assumption we shouldn't have made. That's come up recently that they're not always doing that.

David Bartlett: So just to ask a follow up question on your behalf, if that's all right, the student would be able to complete this year. They've already started. And then have one more year after that.

Jeff Baker: I believe – and I have copies of the letters here. I can dig them out just to make sure – I want to get a little break. But I believe it's for this – we use the term academic year. Academic year is a term that doesn't have a firm definition in our rules, but we use it here because our foreign institutions use that term, and they're different around the world and in programs. For this academic year, we're going to now and one more after that. And it'll differ among the institutions as opposed to at a domestic school, we can talk about award years, but it doesn't work that way for foreign schools.

David Bartlett: Thank you for your clarifications there.

Audience: Hi, I would like to follow on through the questions. I just ask why a validation agreement is no longer suitable for you when for the last few years it has been. It was checked through your lawyers, I believe, when it was instigated whenever it was, ten years ago. Why suddenly now it's changed? In the UK, we have recognized bodies and listed bodies. They both and equally award degrees, and they're both recognized in the UK under the UK qualifications framework. Why am I now having to tell my students they can no longer continue their degree because of this change? I don't even – I understand what you're saying, but I don't see what – listed in the recognized bodies list is not valid anymore. What's changed since the 23rd of November?

I'm talking about the non-validated – or if it's a college doesn't validate its own degrees, doesn't award its own degrees. So again, I'm in a special institution that does not award its own degrees. It awards degrees – fire another institution.

Jeff Baker: Right. This is the same question that she asked.

Audience: It's an add-on question. So for the last ten years, I've been issuing loans under validation agreement that has allowed me to issue Title IV loans to students, and I've again have _____ default rate I've had about 10 to 15 students per year. Now suddenly, this specialist institution is no longer eligible to hand out loans. Why is the validation agreement not recognized, that's the question, when it has been for the last ten years.

Jeff Baker: With all due respect, it's the same question, and my same answer is that under the law in our regulations, domestic or foreign, the institution has to award the credential. The fact that we – I don't know. I don't know did we miss or were we not paying attention in the past. It's interesting and important, but really irrelevant. We cannot just ignore the fact that the law says the schools, foreign or otherwise, have to award the credentials. Not have it be validated by some other institution. And so the fact that for ten years – it's the same question she asked, and it's the same answer. That's what the statute provides for.

I did get a copy of the letter because I'm pretty sure this – in this last paragraph. Foreign institutions that have lost eligibility result are not permitted to award direct loans to new students. However, they may continue to award direct loans to students who obtain

such loans prior to the loss of institution eligibility and who maintain continuous enrollment. These students may receive direct loans for the academic year. That includes July 1st, 2011, two months ago, and the following year. So for those continuing students, at least one more, the current year, and one more year. But your question, and I respect it, but it's the same question and the same response that the law does not allow – offer aid to go to a school that doesn't offer –award the credentials.

Audience:

I just find it strange that in a section we had earlier, in re-certification, it asks for validation document is on a slide. So why are you asking for validation documents? You're not accepting them. Why was I told to do a validation document for my re-certification when you're now telling me it's not valid? It hasn't been for the last God knows how many years. I find it quite amazing that I came to a conference. On day one of the conference, I find I lose my eligibility, and I'm going to get a termination letter in the next few weeks. I'm told today or yesterday, and I've got students who I just recruited who have been recruited on the basis they're going to be able to come to my school with loans.

They're now no longer going to get – I've got to go back, tell them they can't come. I've got students already on programs who are on a three year program in year one. They're going to have loans for this year only. I cannot give them the second or third year. So they've started on a program they cannot finish because they need loans to complete. What am I going to tell them? You've go to withdraw. I don't understand this regulation. I'm sorry.

Jeff Baker:

I don't know what else to say. I appreciate the frustration. We will – Danny and Pierre and I and the rest of us, we will bring these concerns back to Washington, talk with some other folks. This, you know, you don't need to know all the gory details, but a dear colleague letter goes through extensive clearance process to the highest parts of the department. So there's no surprises here. But we will take these concerns back. I don't want to lead anybody on to think that something might get changed, but obviously, we have a responsibility to the secretary and to other folks in the department to bring back anything we learn at this conference, and we will bring this issue back as well.

Audience:

Sorry, again, it's a follow on from the previous questions. We've got one program that's validated by another institution. The institution that validates it actually participates in this program also. Could the students receive loans through that institution?

We would have an agreement internally that they would then transfer funds over to us. Would that breach any regulations?

Jeff Baker: Yeah, I think so. The reason I – there's another letter, number 19, I think, and that had to do with these consortium of contractual relationships between institutions. That one said that – and for the same reason. We have statutes written that a foreign institution cannot – let me back up just a second, just take a second. Under our regulations, a school, any school, can enter into an agreement with another eligible institution to offer part of the program. What GEN 11-19 said, though – I

David Bartlett: Eighteen. I just looked it up. It's 18.

Jeff Baker: Eighteen. Was for foreign institutions, you cannot enter into that agreement with a US domestic institution. With a US domestic institution. But there's nothing that would prevent you from – I don't believe there's anything that prevents you from entering into such an agreement with another foreign institution probably within your same country, but not necessarily. The thing is, though, that – and that's an eligible institution just being in our programs that we'll work under what we call a consortium, but there's limits to how much of the program can be offered by that school, and that school would have to be the home institution of the student.

So you have to kind of switch it around. That student would have to have been admitted to and enrolled for the purposes of getting a degree at that institution. Okay, I think we got it right. So it would have to be an eligible institution. And that student has to be enrolled to get a degree or certificate from that institution. They can be taking courses at yours.

Audience: So the internal process at the moment is the student is enrolled at the eligible institution. They actually receive the tuition at our institution, so we would receive payment for that tuition, but then the student would get a degree and be validated by the other institution. That's okay.

Jeff Baker: Yeah, the only thing is the financial aid, the direct loans would have to be administered by the other institution.

Audience: Yes, but they would then just internally pay us off _____

Jeff Baker: Right. That's how consortiums work all over. Right.

Audience: And that's fine.

Jeff Baker: Right. But there's a limit. Remember, while this is perhaps a creative way to deal with the issue that we've been talking about, the student has to be admitted and enrolled and go on a gifted credential for the other institution. They can take part of their coursework from your school, let's say, but only a portion of it. It can't be the entire program. Just the one that's on that.

Audience: What's the percentage?

Jeff Baker: I think it's 25. Yeah, I think it's 25 percent. The other letter kind of speaks to it, I think. Yeah, I'm sorry for this. We're just kind of surprised by these questions. What Joe is reminding me of and tried to before, but I blew him off was that your institution would become an ineligible institution because you don't award the degree.

Audience: Just for that one program.

Jeff Baker: It's program-by-program.

Audience: Uh-huh.

Jeff Baker: You know, we need to look at this. Let me make this promise to you. Assuming for a moment, and I think it's a good assumption, that we're not going to reverse ourselves on the 11-20 letter, we'll explore a little bit about some options like this and make sure we get it out through the [Fundgal](#)'s site, website, about how you might be able to make these things work, and we'll be careful. I don't want to – I already might have made a mistake just now, but he interrupted me, quite properly so. We'll get it out to see if there's some ways to make this work.

Audience: _____ time sensitivity because we're already recruiting in the program currently.

Jeff Baker: Right. We will do it very quickly, and probably even have some discussions while we're here this week. Not that it matter – I mean not that it's unimportant, but is this just a UK issue as far as we know, this validated thing? Okay. That doesn't diminish the problem at all, but I just wanted to understand.

Audience: My question has to do with something that was raised earlier today at one of the sessions about institutional eligibility, and I think this is related, although I'm not talking about the same problem, but I

just want some clarification on this statement that an institution has no written arrangements with ineligible institutions to provide any part of one or more eligible programs. And I don't – I still don't understand whether or not that includes all arrangements with all kinds of institutions, or is it just for programs that US students might be attending?

Jeff Baker:

If the program does not provide federal student aid, US federal student aid, to students, either because there are no US students in the program or US students don't get the aid, then it's not covered by us. Our rules cover schools that participate in our programs, and then when you get down to programs that participate in our programs, and ultimately, to the student. So if you have some programs that don't participate in our programs – I want to _____. Have some educational programs that don't participate in the direct loan program for whatever reason, have chosen not to, there are only US students in there or whatever. Then whatever arrangements you make with anybody else is not our business. Is that –

Audience:

Yeah, I think probably – are you familiar with the **Rasmus** programs?

Jeff Baker:

No, I'm not.

Audience:

Most European – how many people here are engaged in Rasmus? Have students in a Rasmus programs? This is programs whereby students spend time in another country. So we do exchanges on a whole range of programs. We offer those as three year, direct degree programs, or maybe a four-year program where they spend their third year abroad. Then they come back and finish their degree with us. So we have arranged with 120 institutions across the _____, and we send out hundreds and hundreds of students. Many of those institutions will not have heard of the US Department of Education or were wise enough not to get engaged with any of this.

So what I'm saying is we can continue with those arrangements, but we just can't send any American students to take advantage of these wonderful programs.

Jeff Baker:

Don't load the question on me. I think that's where you actually end up, right.

Audience: So all I'm saying is we can have arrangements at other institutions. It's just we're just excluding American students from taking part in those.

Jeff Baker: But I think we're also –

Audience: Unless it's another eligible institution.

Jeff Baker: Let me try to put more guidance out about sharing programs with other institutions, either within your country or in other countries with some of these things. We'll try to cover these topics and get something out very quickly because we understand the time constraints.

Audience: Because I thought the 25 percent rule had somewhat changed.

Jeff Baker: There have been some changes in that in terms of eligible programs – eligible institutions and ineligible institutions. So we need to sort all that out. Doesn't anybody have an operational question for these guys? Like what does COD stand for or something?

David Bartlett: The gentleman in the green shirt has been very patient on the next row behind you.

Audience: Sorry, but I have a similar but slightly different question, which was relating to, again, the eligibility requirements that were spoken about this morning. And in particular, about foreign schools not having written arrangements with the institutions in the US for students enrolled at foreign institutions to take courses at institutions in the US, and how is that interpreted and applied? Is that at an institution level, or a program level, or is it particular to the student? Because foreign schools may have a relationship with a US institution to teach part of a program.

David Bartlett: Right. In many cases, it's a bilateral agreement. Some US students will do some of their work at your school, and some students – sometimes it's a US student. It's student by student, so a student – a US student who is – you'd like to fund with federal student aid, cannot have part of their program offered by a domestic – a US domestic institution. There's a restriction. Part of the reason for that is if they were gonna get their education from a US school, why aren't they at the US school and doing it in the reverse way? Now there's lots of reasons why. It might be better the other way where they get the credential ultimately from your

school and so on, but that's – thank you, Tony, but that's where we ended up.

But a student _____ - the fact that you have it – it's similar to the response to her question. The fact that you have agreements for other programs or other students, your own domestic students that do some work in the US, that's fine. Just the US students cannot meet their enrollment requirement for direct loan by studying even for a portion at a US school. Is it going to be a nice question?

David Bartlett: She'll ask it politely, I'm sure.

Audience: So if a student comes to study in London and decides that they want to do a study abroad program at NYU, are they then not eligible for funding?

Jeff Baker: That's correct. They are not eligible for funding.

Audience: I asked the question nicely.

Jeff Baker: Yeah, you did. I'm not sure I answered it as nicely.

Audience: I just have a question about the annual loan limits. It's my understanding from the literature the last time they were revised was 2008. Are they going to be addressed to address tuition hikes and other fee increases? I'm in school in British Columbia, Canada, and not only are their tuition fees triple, but their living costs are quite high, and the loan limits for annual are just really, really low.

Jeff Baker: _____ is loan limits are set under the statute. We don't regulate them. It's not anything under the purview of the secretary or any of us. And you're right. In 2008, for the first time in like 10 or 12 years, the loan limits went up. Then there was a little subsequent little tweak, so they went up for subsidized from 26, 25 to 3,500 and those things. And then there was the last time around was the – an extra \$2,000.00 in unsubsidized. It's a congressional issue. I have not heard anything. I don't know if Danny has, that anybody is looking at increasing. Yeah, there's a re-authorization of the higher education act scheduled for 2014. But remember, the last one was scheduled for 2004, and we never really got it until 2010 or something.

Long story – I'm making more of this than there is. There's nothing in the offing that we're aware of about increasing loan limits. And yeah, the Obama administration in our budget

proposals that we put out each year, and I'll give you a hint, including things we're looking at in the future, has not been a topic. It's an important issue. On the one hand, there's increasing costs domestically in the US as well as – maybe more dramatically, in Canada or some other places. Balanced against there's a cost to the federal government of the loan programs, and there's a continuing concern about too much borrowing. Then you have private borrowing and all that kind of stuff.

Audience:

If I could just add, there was an add-on. Many of our students who come forward, first time borrowers, and they say, "Oh, I'm eligible for a Pell Grant. I'm eligible for this because they're FAFSA," or, you know, the _____ kicking that out. And then what happened is we have to explain to them, "No, you're coming to a foreign school. You're not eligible." So they've already made all these plans, and I'm wondering if there's anything from your side that you could put in literature, you know, upfront to students who – so that they know when they're getting back that initial approval on an application that half of that might be null and void if they end up choosing a particular school. I mean I can only speak for Canada, but that's an issue, too.

Because they think they're going to be getting more funding than what they can actually –

Jeff Baker:

That's a good point. Even when they ultimately – you have to explain to them that they can't get a Pell Grant, and after they get over that, they might assume, "Well, okay, I'll get just that much more loan," and they might not be able to because of the loan limit. I'm not sure what we can do because we don't know - _____ list the schools that they're attending. Now there's a link on the application on the FAFSA on the web, and when they list the schools, and also a link when they get there. The student aid report back electronically to the schools that they listed to click on that, and it will go to our college navigator website.

And there, it provides information about the schools including what programs they participate in. That's like a three-step process, and our students don't always do all of that. I'm not sure how much more we can do.

Audience:

What's a good – do you have a rationale or a blanket statement that we can tell our students. Their question is, "Why not?" And I don't really have a great answer for them.

Jeff Baker: Yeah, no, I have an easy answer if it's like the other one. The statute has been clear from the beginning. It's now switched to a direct loan, but when it was FFEL, that's the only program that foreign schools can participate in, the loan program. It's statutory
–

Audience: The direct loan.

Jeff Baker: Yeah. So the answer is – and maybe we can find a way to – I'm sure it's in our literature and some of the funding your education things or so on, but we can check. But the answer is the law that authorizes these programs and authorizes foreign institutions to participate for US students only is for the direct loan program and not for Pell or anything else. I understand the issue, and I get this thing saying, "It appears you're eligible for a Pell Grant or \$5,550.00, and perhaps some loans up to these amount. Check with your school," and you check your school, and then say, "Sorry." The 5,500 get thrown out. Maybe we can do something more with technology.

Audience: Because they find out too late. That's the problem. By the time they actually reach the financial aid office or advisor because they're thinking, "Hey, this came from the US Department of Ed. I'm approved." And so it's too late. Now all of a sudden, they get this shock of news, and it's a problem.

Jeff Baker: Maybe the technology can help us if they list a foreign institution or you can flash something on the screen or something.

Audience: Or just to give them a heads up. Make sure you contact your financial aid advisor at your school to see what you're really eligible – or entitled to. Okay, thanks.

Audience: My question goes back to the consortium agreement between foreign schools and US schools.

Jeff Baker: I'm sorry. Which agreement?

Audience: The consortium agreements between foreign schools and US schools.

Jeff Baker: The ones you can't have.

Audience: Right. So last year, I had a student who wanted to study abroad in the US. So I told her she couldn't. So she withdrew from our

institution, did a semester at their institution, received direct loans through them, and then came back to us.

Jeff Baker:

Well, we give her an A for creativity, I guess. In order to get aid at any school, the student has to be there, in a program, designed to lead to a credential offered by that institution. Now we can't hold students hostage and say, "Once you start at a school, you're going to stay there forever. You can't go any place else," because students obviously have the right to move around. But if when she went back to the school she wanted to kind of do a study – a reverse study abroad I'll call it, and assuming that they – in order for that school to give her loan money, and if she was an undergraduate and eligible, even Pell Grant, she should have been admitted as a regular student with a degree objective. Now what she whispered to the counselor about what her real plans were, we can't control.

So she looks like any other student that was admitted to, applied to, and was admitted to whatever domestic school was. She even looks like a student even if they knew that did some studying at your school outside the United States and has decided that she wants to finish up there. The fact that in her mind, she's kind of figured it out. You know, the law says she was eligible at one place and not so eligible back at your place.

Audience:

It's too bad because we do offer a business – like in our business degree program. We offer an exchange with Emory, and we award students that have a GPA of a 3.6 or higher that are in the business study program to spend a semester. And I've had to tell US students, "I'm sorry."

Jeff Baker:

Well, with a 3.6, that probably explains why she figured it out.

Audience:

This wasn't her. She was a separate case, but we do have this ongoing program with this other university, Emory, where they send us students, and then we send them students, and the students that we send them, it's kind of like an award to them for doing so well in the business studies program.

Jeff Baker:

But is it – and I'm just curious. Some of the students that you send to them are your domestic students.

Audience:

Right. That's the only ones that now can go are the –

Jeff Baker: Right, but just – well, I don't want to get – but the US student going there and then coming back, it's kind of like, "Why didn't you study in the United States in the first place?"

Audience: _____ [*not speaking into microphone*]. That's the whole point of international _____. To be able to cross borders and have –

Jeff Baker: Right. So go to another – unfortunately, it's only for loans, but go to another country, benefit from that experience, which is a wonderful experience. But maybe our rules – maybe the law hasn't caught up with the internationalism and moving back and forth and taking most of the program were some place and then coming back on a relationship that's been established. But that's where we are right now. I can't say much more than that.

Audience: Jeff, I'm going to give you a little break and ask an operational question. Really quick one. I discovered this year, and surprisingly, a lot of staff in America did as well that COD can't take a six-value figure. With increasing inflation and poor economic climates, it's more likely that we're going to have to put more through of that size. Is it something that can be easily corrected?

Jeff Baker: Is this the EFC?

Audience: No, COD. Can't take a six-value figure for loans. No, for the loan amount I want to take to disburse to a student.

Jeff Baker: Oh, this is for plus loans.

Audience: Yeah.

David Bartlett: Maybe invest.

Jeff Baker: COD only takes –

Audience: They'll only take five figures.

Jeff Baker: Are we fixing it? We have – I don't know if you were at the federal update this morning, but one of the – shame on you. Because anyone who was there could award anything they want, and these rules don't apply to anybody who was at our update this morning. What I would mention there, we have a lot of coming out about – we have the same issue having to do with – especially _____ contributions. We only report them up to 99,999. We never thought we'd have EFCs of 100,000. We never thought

people who make more than \$1 million would apply for financial aid, but they do. So we have to fix that in our system so we get some guidance coming out.

I wasn't aware of this one, but we'll put this on our list of – so you have a cost of attendance that's over 100,000.

Audience: Oh, yeah.

Jeff Baker: Oh, yeah. There's no other resources. And it's a grad student.

Audience: It's a grad student. Yeah.

Jeff Baker: Yeah. You have to do it in two loans.

Audience: You do it in two, but sometimes, it doesn't always take the second one. It kind of says, "I've got one."

Jeff Baker: Yeah, there's probably some rules about making sure it's not replacing one, and so on loan periods –

Audience: And also, you can only put one loan on the MPN. So they need two to get one loan.

Jeff Baker: Yeah. We'll take a loan. I'll be honest with you, there's limited amounts we can do in our systems both because of how it disrupts the systems, and also, the cost of fixing it, and we have to weigh all of that. And if there's a workaround – if there are not lots of these cases, and you're right. There are more and more every year. And if there's a workaround at least for a while until we reconfigure a system, we may just be stuck with that. I'm going to add just parenthetical, personal, and so on. Students borrowing \$100,000.00 a year for a couple year program, and then we just come back at our next meeting and talk about default rates, and all these people having – and you heard the secretary this morning and so on. It's a very big concern. \$100,000.00 for one year of education.

Audience: Yeah, I've got a ____ **default** rate is zero, and he's internationally recognized for his research and been published several times. It's not every student, but it's legitimate. You can't deny them money he needs.

Jeff Baker: These students understand they have to pay back these loans, and bad things happen to them if they don't.

Audience: I do exit counseling. They know.

Jeff Baker: Okay.

Audience: The second question is where are we with a new foreign school audit guide as many UK auditors are waiting for the guide, and obviously, we still need to remain compliant by producing our audits.

David Bartlett: Foreign schools audit guide.

Jeff Baker: Yeah, I saw that question. The inspector general's office, the org puts out the order guide. If we have any guidance on –

David Bartlett: Yeah, I was going to say, that's probably a Tony question.

Tony: We've recently had conversations _____. [*Not speaking into microphone*]

David Bartlett: Tony is having – he's explaining that they have recently had conversations with the inspector generals' office.

Tony: The document is a draft. They're going to be sharing it internally for correct, and they're hoping to get it out, quote unquote, soon as possible, and I think that it was alluded in a session earlier today that in the interim, they're going to be sending a dear auditor letter, which hopefully is going to be coming out before January.

David Bartlett: And do we know will that dear auditor letter please be published to the foreign schools website? I'm getting vigorous head nods. Yes. Thank you.

Jeff Baker: Thanks, Tony. You've got to give me a couple softballs because I feel like we didn't do very well with you so far.

David Bartlett: The gentleman in the first row, and then the young lady in the second row.

Audience: Thank you. This is a question about converting financial statements into US gap. At the moment, a number of UK universities are visibly and very expensively converting their accounts to US gap. In 2016, UK university will need to convert – will need to prepare their accounts under international financial reporting standards. So the question is can the US Department of Education give a firmer commitment than is in that CFR 668 that

they will accept international financial reporting standards from 2016 onwards and not have to convert those accounts to US gap?

Jeff Baker: Tony?

Tony: Yeah. As I understand it, one of reasons why we've asked for both home country and gap **gaggis**, is to see where the similarities might be so that perhaps we can change our requirement and make it easier for non-domestic institutions to supply us with that financial document. At this point, there has been no additional discussion of what steps are going to be taken and how soon they would be taken. So until something – new guidance come out or that there is some change by our own **gaggis** in how they're going to accept international accounting standard, I would think that they're going to have to continue with the current regulation until otherwise notified.

Jeff Baker: Yeah, I think that's right, and I know when this came up in the regulations and it was controversial, what we want to see is the US **gaggis**, whatever, as all countries are looking at what international gaps is going to be, and whether that country – each country is willing to adopt – to have its programs come under that. And that's the whole purpose of the international gaps. We're hopeful that it'll turn around, become a non-issue, everything will be done under this signal of international gaps. But we're not there yet. We think what's going to drive this, as important as all of this is to us as institutions, what's going to drive whether US accepts international gaps is the commercial world where all of US companies are going to – we're all international and so on.

That's probably what's going to drive this is some comfort level and all of that. But we just have to wait a little bit longer to see. So any more firm commitment, we can't make at this point. And our statute says US gaps.

Audience: My question is about all these systems that we have to deal with in order to be able to originate a loan, and then again, report, you know, the **SSURs**, the for the auditors, et cetera. Is there a way where we can get, I don't know, a document specially for the new – or even those who have been working for a while on this, and that we're still figuring out what to do and where. A document that will show how these systems are related. What is the most important ones to deal with that we cannot escape, or what replaces what, et cetera? Because I feel like there are some overlaps somewhere, and I still to now from last year to now, I cannot figure out really what are the systems, how they are all of them

related. I can see relationships between them, but I don't have the whole picture yet.

Jeff Baker:

I think it's a good suggestion, and our team can look at seeing what materials we already have or should we develop some materials, Barbara, and do a document or webinar or something on taking you through the whole process. As we work to bring all our schools and foreign schools from FFEL into direct loans, we put a lot of effort into that. I grin just a little bit because your question of which are the most important, they're all important, and they all have equal importance. Which of your children do you love the most? All of them, you know. But yeah, I mean where schools that had been in FFEL, you never had to deal with something called COD. You had some other process. You also had in some cases, not all of you, but somebody else handling the FAFSAs and the ISIRs and the eligibility, guarantee agencies or others.

So now, you have to be aware of what the central processing system does and gives you ISIRs so you can get this EFC and determine eligibility. You occasionally have to check NSLDS if there's a flag on the ISIR that says there might be a problem, the student is in default or has exceeded a loan limit or something. You have to originate and get your money through the COD process. And enrollment reporting, SSUR is backed through NSLDS is critically important because when students are enrolled, they don't have to pay back their loans, and when they're not enrolled, they have to. So they're all very important, but I think you make a good point that we probably – it's time after – it's been a year now, a year and a half since we've gone 100 percent direct lending to go back in for our foreign schools to kind of take you through a primer on all of these systems, how they relate, and how we can provide some assistance.

Audience:

Thank you. Just clarification. I said important. I meant, for example, I had an answer that can we use Banner instead of **ED Express?**

Jeff Baker:

Yeah, you can use it – you can have a third party – you can use third party software if – you have to pay for it. And I'll give you just a suggestion. Make sure if you think about doing that, when you look at the different companies that offer it, and I would suggest looking at several of them like you would normally do. Make sure they understand that you're a foreign institution. And number one, you should be paying for a full package that calculates Pell Grant eligibility, for example, and other things that are special of foreign institutions. So you can have that. You can

also hire a third party servicer to actually do the work for you. Not just the software, but a third party. They have third party services that will do this. You can use your own tools that you develop. Probably not the most efficient with the – most of you have relatively small numbers of US students. The ED Express software suite is pretty valuable. It'll get you through most of it, and online, we have more and more online processes, so if you don't have a lot of students, I guess a CR reporting. If you don't have a lot of students, you can just go online and do a few things. Right?

So there's different tools available. But I would – I suggest as you explore some of those, if you have some specific questions, send them into the foreign schools team, and they'll either be able to answer them right away, or they'll get to any of us or operations people to help you out.

Audience: Thank you.

Audience: Just a question. Has the US Department of Education ever thought of taking a look at other country's student aid programs to determine whether there be a way to make it a little more seamless for schools and students to apply for student aid?

Jeff Baker: Do you mean to – just by best practices or for US students studying in another country to –

Audience: For your entire program. Whether it's students in the US studying abroad, studying anywhere. I mean it just seems like a very – just listening to some of the disclosure requirements, all of those types of things. I guess I sit here and go, "I don't understand why anybody would have to put a list of textbooks in the costs up on a website and that be part of an agreement that I have to have or anybody has to have with – in order to participate. Just to look at other countries, i.e. Canada, i.e. Ontario. And I know other schools from other countries have mentioned the Ontario student loan program as well being quite easy to manage and very seamless for everybody concerned.

Jeff Baker: I don't know if these guys want to join in. I think it's a good suggestion. I think – how do I say this? The doors are closed. You don't have to tell anybody I said this. The US has a tendency in a number of areas to think we know how to do everything and no one can tell us what to do, but we know better. We have – just to prove a point, we have looked at the student loan collections in the UK and Australia and New Zealand, I think, to their revenue

systems and so on. Now that we at least initially have determined that it won't work because of the way taxes are collected in the US, but we do need to look more broadly. I think that's a good suggestion.

Dan Madzelan: Your question actually was has anyone in the US Department of Education done any of this sort of work, and I think the short answer is no, but the research community, certainly those interested in higher education, financing, and those kinds of issues, have been looking at this for a number of years. You know, a number of papers written, number of papers shared with us, a number of papers shared with our congressional authorizing committees. But I think one of the issues, you know, to be blunt with the doors closed, is that our authorizing committees basically oversee domestic agencies. You're not seeing the sort of the foreign affairs committees in the congress looking at these kinds of issues. So it is very much sort of a domestic focus. And again, aside from some research and doctoral dissertations and masters thesis that have been written on the subject, really not a whole lot more discussion than that.

David Bartlett: Dan, would you also please introduce yourself? Because many of these people may not know who you are.

Dan Madzelan: That's me right there. I'm Dan Madzelan with the Office of Postsecondary Education.

David Bartlett: Thank you, Dan.

Jeff Baker: Just take a second, a little anecdote to your question. When – before direct loans were in just FFEL, we get international visitors on occasion to come in and talk with us about our systems and so on. And we had delegation from China a few years ago, and our manager there who is no longer, he started off the conversation by saying something along – he said, “I want you to pay very close attention to the way we describe our student loan program because you absolutely, positively don't want to do it this way.”

[Laughter]

And what he was getting at was how – and I'm not picking on Phil. I mean that's over with. But that it was built 40 years ago in a different environment, politically motivated then and ever since, and lenders and guarantee agencies and subsidies, and you know, all these kinds of loans and so on. I think he said, “I'm gonna tell you how we did it and what we did, but please don't do that

because it's not the right way to do it. And now I'll put a little plug. We think that direct loan gets rid of a lot of that stuff, and it's much more like how some of our neighboring countries and other countries run their programs. You run it provincially, I think. Both provincially, and yeah. And there are some state – in the US, there are some state loan programs and plenty of state grant programs.

David Bartlett: Our next question.

Audience: We went into the direct loan program a year plus ago here basically with the same staff that we had had for FFEL. But the workload is different. The responsibilities are different. What I'm looking for, is there a statistic, probably not on foreign schools, but even domestic schools of how many known recipients to a financial aid person or some – we need to re-work budgets, internal budgets, institutional budgets to – if we're going to participate or accommodate, to stay in compliance, to list the disclosures, to – and the list goes on. What kind of help do you have statistically?

Jeff Baker: I'm not – a couple things. Foreign institutions have a much more challenging situation to face going to _____ directly, and that's because – well, for two reasons. We're all being very frank. A lot of the work – let me try this. Domestic institutions, after some moaning and groaning about it, turned out – and we had a hearing before a republican committee, and our chief operating officer, Jim _____ who spoke, and we had other school representative. The direct loan transition of FFEL domestic tools to direct loan was a lot easier than those schools thought it was going to be, and actually saved them staffing. That's because they had to do all of the activities, and they just do them differently, and we pick up some of them.

Foreign institutions I think for the most part – not all of you, but for the most part, a lot of these responsibilities were done for you by the FFEL community. And they're not being done there now. This is why I say with the pretend the doors are closed. Some of the things we require now because we can _____, you should have been doing but weren't. Just be out there with that. Checking loan limits in NSLDS and all that kind of stuff, but now, rightfully so, you're supposed to do that. So you're exactly right. I think it would not be fair for us to say direct loan, 100 percent direct lending, FFEL schools went for direct lending. In general, it was easier than they thought and ultimately resulted in less workload. You have to say that's for domestic. For the foreign institutions, it's a lot more work.

In terms of workload, I don't know that we have anything. I don't know whether we could take a look. Doing surveys is tricky. We really can't do them. Yeah, I was going to say NASPA, and there is an association that represent foreign institutions and so on can look at those things. But one of the challenges, and just – I mean it can be done, is that institutions are organized differently. Things that – some of your schools because your numbers of students are so small you really don't have – technically have a financial aid officer, but you don't necessarily have financial aid office, but somebody – in some schools, the bursar's office or the cashiers or business office picks up more than the other registrar's in terms of reporting SSUR, so it's hard to tell. But there have been some surveys, and maybe we can take a look at the NASPA surveys and maybe suggest that foreign institutions can either use that survey, understanding it's going to be a little bit different or something so you can get a framework as to how much work is involved.

And obviously, it depends upon – some of our foreign institutions, some of you are here, have if not dozens, it's hundreds of US students. So you built a different kind of infrastructure than a school that has a few dozen and maybe even fewer. And some years, not at all because it's just the nature of your program. But we'll have the team try to share with you what the professional associations have done.

David Bartlett:

And for those of you who may not know, NASPA is the National Association of Student Financial Aid Administrators here in the United States. I know they do have international people that have joined, international schools that have joined NASPA. And it is a school membership, not an individual membership.

Jeff Baker:

She said is it a cost?

David Bartlett:

She said is it a cost that they can be reimbursed for by the Department of Education. And I wasn't – thank you for asking me to clarify, Jeff, but I didn't want to repeat it. Thank you. I have a question over in the front.

Audience:

Following the _____ back in February 2010, and through August, we were asked to provide submissions on the consultation process, particular relation to US gap. Yet to the publication that came out on the first of November, most of us have raised submissions along the lines of having ordered it for ratios, which today in the audit session we've learned is probably not much more than very basic first year accounting. This was in fact totally ignored in the actual

bulletin that was published on the first of November, and instead, there's a treaty by the administer of time burden or what you perceive to be the lack of it. Why was the original point raised, totally ignored, and the question answered that hadn't been raised, and is this the style of consultation?

Jeff Baker:

When you say the November 1st, was that the letter? Oh, the final rule. Well, I don't know exactly on the topic, but the way the rules work, we have a negotiated rule making. And did we reach consensus with the foreign institutions? I believe we did, and so we published the NPRM. So that negotiated rule making committee included representatives from foreign institutions, and had some spirited debates, I think, about all of the accounting and the auditing and stuff. But they reached consensus, and so we published the NPRM that way. We received comments from the public, and then based upon those comments and other considerations, the department, the secretary technically, but the department's policy folks made some decisions and issued the final rules.

And what we should have done if we didn't do it well enough, I don't know what to say, but in the final rule, in the preamble, we discussed the comments we receive, and then we have a discussion about what we think about those comments and whether they're something we're going to change or not going to change, and then tell you whether we changed anything, and if so, what. So that's the process that on the statute how we do our regulations. So the consultative process is negotiated rulemaking, and then looking at public comment.

But ultimately, under our system, its' the secretary of education who within the framework of the statute decides what is going ultimately to be in the final ruling.

David Bartlett:

Time for one last question.

Audience:

I called at last year's conference, and we said that we were very grateful for you coming out to Europe and the rest of the foreign school arena and trainers on direct loans, and we asked because we'd lost all the stuff we were provided from those in the FFEL program if there would be a continued commitment to training. It's been 18 months. We haven't seen anything. We don't know if anything is going to be planned. Obviously, I don't know if you've noticed this year, but there's certainly far fewer numbers from some of the foreign schools because of the cost and economic plan. It's _____ training. So my question really is, again, as it

was last year is what commitment are we going to get for future training?

Jeff Baker: Well, I want to be careful because I don't want to make a commitment.

Audience: I'm going to hold you to it as well.

Jeff Baker: Right. I think we will – I know we will go back and look at the kind of training we can put together on an ongoing basis. Webinars, using technology, and as well as paper publications and so on. I think the team will do – what we can and all of that in to cover both the policy issues, even the ones that you don't necessarily like. But we need to get the clarification out and operational issues and so on. I doubt very much whether you're going to see us visiting you like we did then. That was a very special situation. We received some special funding for that.

It's possible, but I think the pressure is going to be to use the technology, which with live webinars, it's almost the same as being there. It's not the same. We understand that, which is why we have our conference here, the 7,000 people are here. But we'll do our best.

Audience: The only problem is a lot of the webinars are out of work hours.

Jeff Baker: A lot of the webinars are –

Audience: Outside of most peoples' work hours.

David Bartlett: We actually did offer a series of webinars, and we did adapt the time zones, but perhaps not enough. We will definitely revisit that.

Audience: A little bit more flexibility.

David Bartlett: We will definitely revisit that.

Jeff Baker: You're absolutely right.

[Crosstalk]

Audience: _____ one day if you get up early the next one.

David Bartlett: Right. We will definitely revisit that.

Jeff Baker:

It's hard to pay attention at 3:00 in the morning your time zone. Yeah. We definitely should do that as best we can. I mean there's 24 time zones, but where there's a predominant number of schools – and in addition, and this isn't instead of, but in addition, we put our webinars, including the audio part of it on the web. It's not the same as listening live. It may be asking a question live. I understand that. So we need to get it in your time zone, and then it's there all the time to look up after that.

David Bartlett:

We have our last question.

Audience:

Last question, wow. Well, I do want to say thank you for the opportunity to have foreign schools come and provide sessions for us. I'm from Canada, and I know we've had the US Department of Education do some webinars and some live conference call kinds of things at some of our Canadian association meetings. And there's good material on your websites. You have your foreign school on the IFAP, and I've learned that I can do my IFAP and get more specific information, but I think what I still find challenging is when a dear colleague letter comes out, and the weekly IFAP, there's a lot of material to wade through for very few US students that I may have.

So whether I may have one student, zero students, or 100 students, the amount of information that I need to know is extensive. And is there a way to, for one thing, interpret the regulations for me because that's my challenge. I may read your regulations, but interpreting and understanding them is a little bit more challenging. And can you somehow when you're directing those IFAPs to us or the information that pertains to foreign schools that we get it more concise or in a way that this is what's important for foreign schools because there's a lot of stuff for domestics that comes out to everybody, and it's hard reading through that and determining what's important for me as a foreign school.

Jeff Baker:

It's a good point, and it's something that's a challenge. I think as part of our – what we'll take back from here is this whole issue of ongoing and timely training, and if we do that right, we can hit those things. Part of the training I can envision just off the top of my head here that in the last few months, these dear colleague letters have come out. Let me spend a couple minutes on each one so you can decide whether – and then if you have some questions, you can – there's ways to do that.

Unless a – but virtually everything that's in a dear colleague letter or other publications we put out apply to foreign institutions as

well as domestic. There are some differences. We just – we talked about things about consortium agreements. And of course, anything that's about the Pell Grant program or the campus space programs, you know, you have no interest in. Those letters usually are designated as such. If they're not, we gotta pay a little more attention to them. But if we put out a letter on using professional judgment – and those are the letters I listed this morning on professional judgment, on avoiding fraud, on a whole series of things. Then they're important for every school, whether they have 10,000 Title IV recipients or two this year.

So I don't know how to wean it out a little bit except maybe in our training to just remind people of those kinds of things. Now our handbook, which is this big on paper, we do electronically, does do a very good job, I think – you can be the judge of that, of taking all the regulations and along the guidance and putting it in a little more readable form and so on and searchable on the database. But we can look at – we shouldn't dismiss the concept and try to find a way to provide more concise and directed training or resources or ways for you to ask questions that specifically have to do with your status as a non-US institution. See what we can do there.

Audience: Thank you.

Jeff Baker: I think the team will take that.

David Bartlett: Well, thank you very much, and we want to thank you for our speaker, Mr. Baker. It seems like you got most of the questions, so a big round of applause for Jeff.

[End of Audio]