Gainful Employment In-Depth

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MCCDEC Data Workshop, 2016

Purpose

- ▶ 10/28/2010:
 - 1. Holding Programs Accountable for Preparing Students for Gainful Employment
 - 2. Protecting consumers from misleading or overly aggressive recruiting practices, and clarifying State oversight responsibilities
 - 3. Ensuring that only eligible students receive federal funds
 - 4. Clarifying the courses that are eligible for federal aid, and the amount of aid that is appropriate.

Reference:

http://www.ed.gov/news/press-releases/department-education-establishes-new-student-aid-rules-protect-borrowers-and-taxpayers

History

▶ 2010-

- > October- Department of Education requires Title IV accepting schools to:
 - 1. Report certain information on students enrolled in a Gainful Employment Program (Student-Level Reporting)
 - 2. Disclose certain information on Gainful Employment Programs to prospective students (Disclosure)
 - 3. Notify the U.S. Secretary of Education if adding additional GE Programs to its list of Title IV-eligible programs (Certification and ECAR)

> 2011-

- July- Regulations released effective
- October 1- Round 1 deadline
- November 15- Final reporting deadline
- > 2012-
 - > June- GE reporting regulations vacated and litigation began
 - November- U.S Secretary of Education new program notification still required
 - Institutions still required to publish Disclosures
- > 2015-
 - > July- 2008-09 through 2013-14 reporting deadline
 - October- 2014-15 reporting deadline
- ▶ 2016-
 - October- 2015-16 reporting deadline
- ▶ 2017-
 - January- Draft Debt-to-Earnings ratios
 - New Disclosure requirements

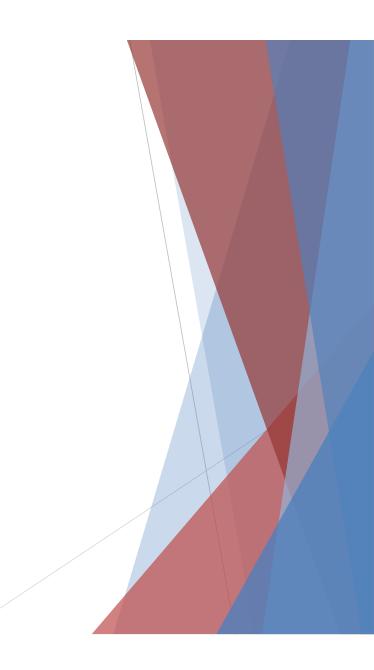
Current State

3 Main Components:

- 1. Reporting
- 2. Disclosures
- 3. Certifications

Timing:

- Completers list challenges/exclusions due: July 28, 2016
- Reporting: October 1, 2016
- Draft debt to earnings ratios to institutions: January, 2017
- Disclosure deadline: January, 2017
- Certifications: Ongoing



Resources

IFAP (Information for Financial Aid Professionals): http://www.ifap.ed.gov/ifap/



Federal Student Aid

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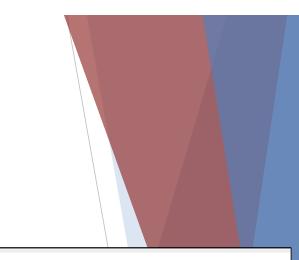
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IFAP

Gainful Employment Information 2014/2015/2016

Gainful Employment Final Regulations were published October 31, 2014. This page provides the most updated information pertaining to requirements for Title IV eligible educational programs that are required to lead to gainful employment in a recognized occupation (GE programs).

The disclosure requirements in the GE regulations that were published on October 31, 2014 do not take effect until January 1, 2017. Until then, institutions must continue to comply with the current disclosure requirements by updating their disclosures each year in accordance with 34 CFR 668.6(b), using the Department's GE Disclosure Template. All other provisions of the GE regulations published on October 31, 2014 became effective on July 1, 2015.



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Top

Frequently Asked Questions

The answers to these Frequently Asked Questions provide information and operational guidance on the requirements of the gainful employment regulations.

You may use the categories below to narrow your search for relevant FAQs. Note that these FAQs will be updated periodically and will indicate the date of an update. New or updated entries will be marked NEW and appear in red font. If your question is not addressed below, please submit it to the GE Questions mailbox at GE Questions mailbox at <u>GE-Questions@ed.gov</u> and include the name of the institution.

- General
- Debt to Earnings Rates
- Disclosure
- <u>Reporting</u>

Webinars and Presentations

Provides upcoming training opportunities and links to previously held webinars and other training.

Resources

Provides links to resources with valuable information on gainful employment.

Federal Register Notices including Regulations

Provides published regulations and Federal Register Notices pertaining to Gainful Employment Programs.

Dear Colleague Letters and Electronic Announcements

Provides the Department's guidance on Gainful Employment in Dear Colleague Letters and Electronic Announcements.

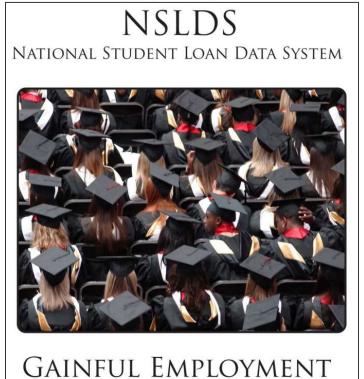
To Receive IFAP Email Announcements:

- Electronic Announcements
- Gainful Employment Information

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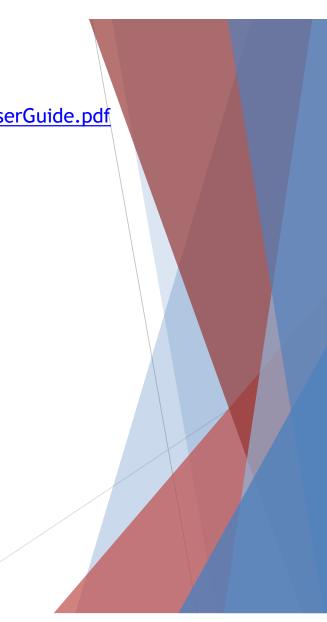
NSLDS User Guide

http://ifap.ed.gov/nsldsmaterials/attachments/NSLDSGainfulEmploymentUserGuide.pdf



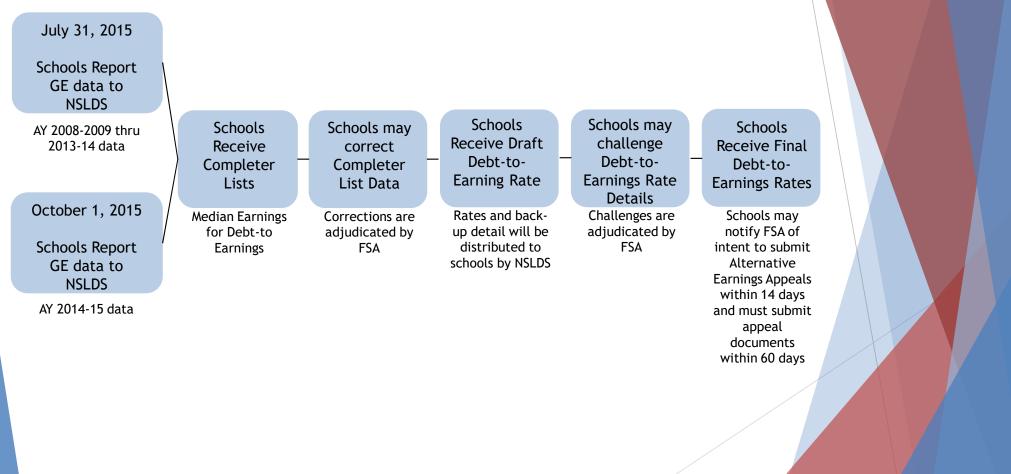
GAINFUL EMPLOYMENT User Guide

June 2016



Reporting

Debt-to-Income Process Overview



Reference: July, 2016 NASFAA Conference- E.D. G.E. Presentation

Reporting In-Depth

- Who to report:
 - Students who received Title IV aid within the reporting year
 - > Students enrolled in an active certificate program within the reporting year
- What to report:
 - Award Year
 - Student Detail: SSN; First, Middle, Last Name; DOB
 - Institution Detail: OPEID; Institution Name
 - Program Detail: Name; CIP Code; Credential Level; Indication of Internship or Residency; Length of program
 - Student Program Detail: Attendance Begin Date; Attendance Begin Date for Award Year; Status; Status Date; Status as of 1st program enrollment date
 - Student Financial Aid Detail: Private Loan Amount; Institutional Debt; Tuition and Fees; Allowance for Books, Supplies, and Equipment
- When to report: 10/1/16 (2015-16 students)

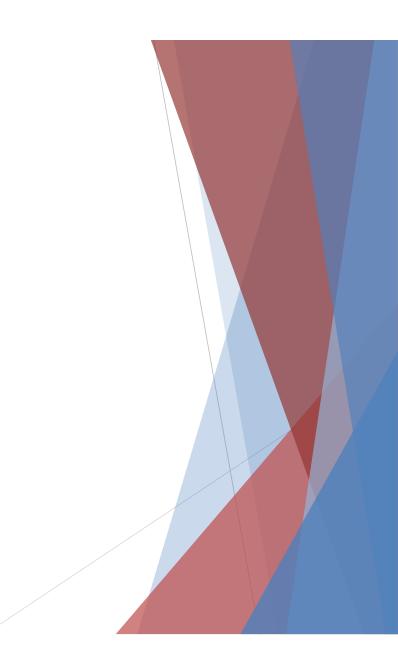
Reporting Tools

Reporting Manuals/Tools: <u>https://www.fsadownload.ed.gov/NSLDSGainEmp.htm</u>

<u>ip navigation link</u>	Search:	Go		
Site Navigation			NSLDS Gainful Emplo	yment Submitta
<u>Site Map</u> Software			Click here to download a free Ad	lobe or Word viewer.
	cumentation			
Privacy Act Help		Document Title	Document Format	Date Posted
Related Services		Cover Letter	PDF Format	02/13/2015
<u>FSA Enrollment</u> (SAIG Mailbox)		Download Guide	PDF Format	02/13/2015
Subscribe to the <u>FSATECH</u> Listsery to join our on-line discussion of systems		Instruction Guide	PDF Format	02/13/2015
issues.		Submittal Template	XLS Format	02/27/2015

Instruction Guide

- Spreadsheet Submission
 - Process
 - Spreadsheet creation
 - NSLDS file upload
 - Working errors
 - NSLDS access
 - Layout specifications

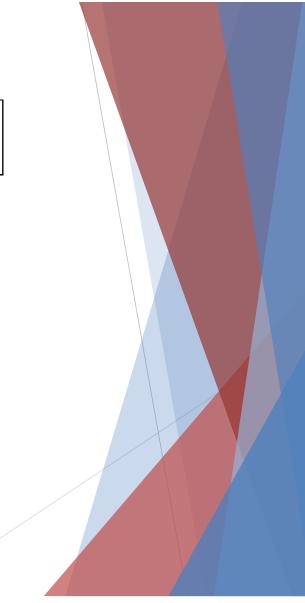


Excel Submission Template

	Student								
	Social	Student	Student	Student	Student				
Award	Security	First	Middle	Last	Date of	Institution	Institution	Program	CIP
Year	Number	Name	Name	Name	Birth	Code	Name	Name	Code

	Medical or Dental		Attendance	Program Attendance Status	Program Attendance	Private
Credential	Internship or	Attendance	for This	During	Status	Loans
Level	Residency	Begin Date	Award Year	Award Year	Date	Amount

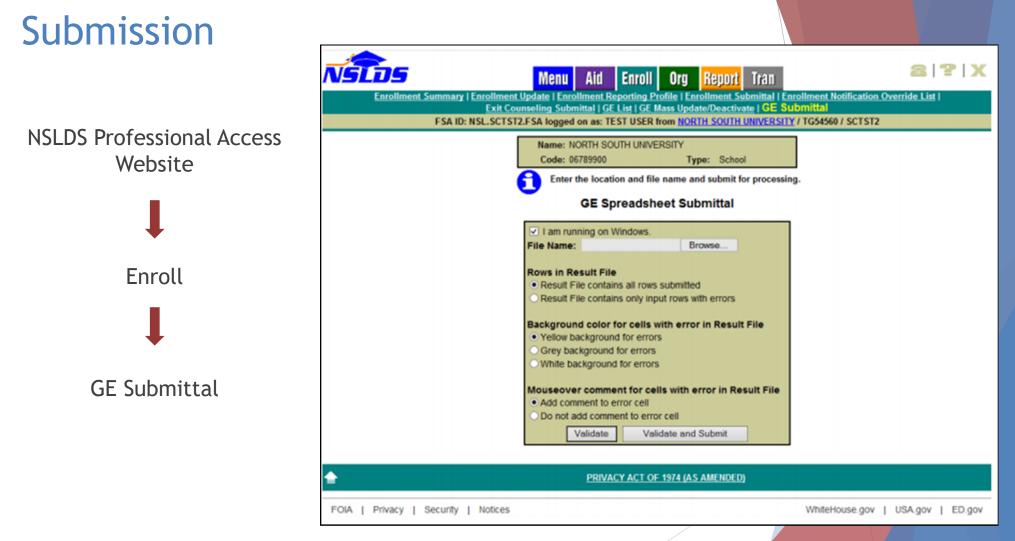
		Allowance for Books,			Enrollment Status as of the
	Tuition	Supplies,	Length	Length of GE	1st Day of
Institutional	and Fees	and	of GE	Program	Enrollment in
Debt	Amount	Equipment	Program	Measurement	Program



Data Definitions

Field Name	Description	Comments
Award Year	Award Year the student was enrolled in the program.	 Award year is identified as the four digits of the first calendar year and the four digits of the second calendar year of the award year range. (Example: the award year of July 1, 2008 - June 30, 2009 would be identified as 20082009. Cannot be less than 20072008 or greater than current award year. If the information provided in this field is found to be incorrect, the entire record must be deactivated online and re-added.
Student Social Security Number	a student enrolled in a ĠE Program.	 Must provide SSN along with the identifiers First Name, Last Name, and DOB. SSN must be a valid SSN as provided by the Social Security Administration. The first node of the SSN must not contain any of the following: 9xx-xx-xxxx, 000-xx-xxxx or 666-xx-xxxx The second node of the SSN must not contain xxx-00-xxxx. The third node of the SSN must not contain xxx-v000. If an institution believes the NSLDS data are incorrect, contact the data provider and provide them with verifying documents. If the information provided in this field is found to be incorrect, the entire record must be deactivated online and re-added. If SSN is not available, do not report this student.
Student First Name	Student's first name	 Must provide First Name along with the identifiers SSN, Last Name, and DOB. If the student has no first name, this field contains NFN (no first name). Must provide the students first name (exactly as it appears on the Social Security card). Must provide First Name if NLN (no last name) is used. If an institution believes the NSLDS data are incorrect, contact the data provider and provide them with verifying documents.
Student Middle	Middle name or middle initial	If student has no middle name, populate with spaces.

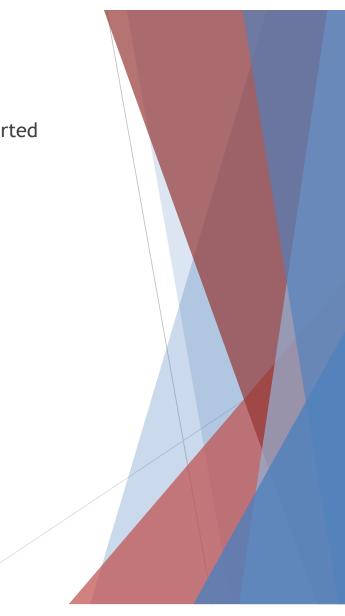
Source: June 2016 Gainful Employment User Guide



Need access? SAIG Enrollment Site https://fsawebenroll.ed.gov/PMEnroll/index.jsp

Completers List

- Purpose:
 - Institutions verify that completers accurately reflects 2015 GE reported completers
 - Completers list used to calculate debt-to-earnings ratio
- Timing:
 - Completers list to institutions for verification: June 13, 2016
 - Completers list challenges/exclusions due: July 28, 2016
- Who is included (for 2014-15 Debt to Earnings Ratio):
 - ► Two-year cohort if ≥ 30 students completed program
 - Students who completed 2010-11 and 2011-12
 - Four-year cohort if ≤ 30 students completed program
 - Students who completed 2008-09 to 2011-12
 - If a program has <30 completers</p>
 - Debt-to-earnings ratio can't be calculated
 - Program not included in completers list



Completers List

- ► File Review Process:
 - Available on the Reports Tab of the National Student Loan Data
 - System Professional Access (NSLDSFAP) Web site
 - Sent to the TG mailbox associated with the user that made the report request
- Submitting Corrections:
 - Add a completer
 - Update student identification
 - Completer exclusion removal/addition
 - ► GE Electronic Announcement #78- applicable exclusions
 - Update or add GE program data
 - Delete GE program data
- Resources:
 - Reading Your Draft GE Completers List Files <u>http://ifap.ed.gov/dpcletters/ANN1610.html</u>
 - Submitting GE Completers List Corrections <u>http://ifap.ed.gov/dpcletters/ANN1611.html</u>

Debt-to-Income Ratio

- Purpose:
 - Requires institutions to meet minimum thresholds in terms of debt-to-income rates by program
- Repercussions:
 - Loss of federal financial aid
- Timing:
 - Draft debt to earnings ratios to institutions: January, 2017 (?)
 - ► 45-day challenge period in terms of loan debt information only
 - Final published date: TBD
- Electronic Announcement #85: Recent Graduates Employment and Earnings Survey (RGEES)
 - May be used to appeal the average earnings of GE program graduates
 - <u>http://ifap.ed.gov/eannouncements/072616GEEA85AlternativeEarningsSurveyResourcesAvailable.html</u>

Disclosure

Disclosure

- What to disclose:
 - All currently active Pell eligible certificate programs (credit and non-credit clock hour/short term experimental)
 - > Program Details: CIP; Institution program name; Credential level; Occupations
 - Cost: Tuition and fees; Books and supplies; On-campus room & board (if applicable); Other costs (additional software, attire, utensils, etc.)
 - Completions: # of completers; # on time completions (if more than 10 completers); Normal time to complete
 - Completer Debt (if more than 10 completers): Title IV student loan debt; Private loan debt; Institutional financing plan debt
 - ► Job placement rates (NOT required in MI)
- Disclosures must be accessible on your public website and program promotional materials
- Disclosures must be posted on website prior to ECAR (Eligibility and certification approval report) submission of new programs
- When:
 - January of each year (New Disclosures and elements- 1/31/17)
 - Addition of a new certificate program

Current Disclosure Template

HELP Gainful Employment Program Disclosure Template For Help Call 855-359-3697 gedt@inovas.ne **•** INSTITUTION OPE ID This input template is to be used to meet the gainful employment disclosure requirements as required by the regulations at 34 CFR 668.6(b)(2)(iv). O PROGRAM INFORMATION Enter the information requested for each program at your institution subject to the gainful employment Q COST regulations. Generally, gainful employment programs include: O DEBT AT PROGRAM COMPLETION At public and private not-for-profit institutions: O PROGRAM COMPLETION IN NORMAL TIME Title IV-eligible non-degree programs (e.g., certificate and diploma programs). Q JOB PLACEMENT ➔ At for-profit institutions: All Title IV-eligible instructional programs, degree and non-degree. O CONTEXT Enter the institution's 6-digit Department of Education assigned OPE ID:

Quick Start Guide: <u>http://ope.ed.gov/GainfulEmployment/GEDT_Quick_Start_Guide_Internet_Explorer.pdf</u> Disclosure template: <u>http://ope.ed.gov/GainfulEmployment/</u> Bulk Upload: http://ope.ed.gov/GainfulEmployment/Upload.aspx

Program Information

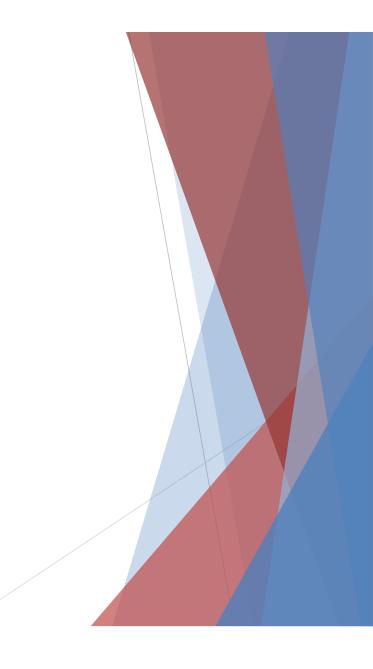
	Program Disclosure Template For Help Call 855-359-3697 gedt©inovas		
	Charles Stewart Mott Community College (002261)	Select the credential level for this program:	
PROGRAM INFORMATION	Enter the U.S. Department of Education 6-digit Classification of Instructional Program (CIP) code for the gainful employment program (e.g., 11.0101); or enter a partial CIP code (two or more digits) and	Undergraduate certificate	
O DEBT AT PROGRAM COMPLETION	click "Search CIP" to browse a list of potential 6-digit matches:	Undergraduate certificate	
♥ ♀ program completion in normal time	12.0401 Search CIP	Associate's degree Bachelor's degree Post baccalaureate certificate	
O JOB PLACEMENT V O CONTEXT	CIP Program Name: Cosmetology/Cosmetologist, General	Graduate certificate Master's degree	
	Enter the institution's name for this program (if different from the CIBH rogram Name shown above):	Doctoral degree First professional degree	
	Cosmetology	Select related occupations	
	Select the credential level for this program		-
	Undergraduate certificate	Check all Uncheck all	
		Hairdressers, Hairstylists, and Cosmetologists	
	Occupations for which this program prepares students	Makeup Artists, Theatrical and Performance	
	Click on the link above to choose from a list of Standard Occupation Classification (SOC) codes	Manicurists and Pedicurists	
	commonly associated with this program's CIP code. If this program prepares students for an occupation not listed, click here to enter the name and SOC code of the occupation for which this	Skincare Specialists	
	commonly associated with this program's CIP code. If this program prepares students for an occupation not listed, <u>click here</u> to enter the name and SOC code of the occupation for which this program prepares students.	Skincare Specialists	
	occupation not listed, click here to enter the name and SOC code of the occupation for which this	Occupations for which this program prepares students	

SOC Code:

Occupation:

Cost

L	INSTITUTION OPE ID	Charles Stewart Mott Community College (002261)
P	PROGRAM INFORMATION	CIP Program Name: Cosmetology/Cosmetologist, General
*	COST DEBT AT PROGRAM COMPLETION	Include costs for completion of the entire program, assuming normal time to completion. Enter amounts in whole dollars.
40	PROGRAM COMPLETION IN NORMAL TIME #	Enter the total tuition and required fees for the entire program, assuming normal time to completion:
4	D JOB PLACEMENT 7 D CONTEXT	16351
		Enter the total estimated costs for books and supplies for the entire program:
		3600
		Enter the total costs to the student for on-campus room and board for the entire program, assuming normal time to completion:
		Check here if your institution does not provide on-campus housing for students enrolled in this program.
		Enter any fees or expenses that students have in addition to those already entered for tuition and required fees, books and supplies, and room and board (for example: optional equipment parking permits, etc.):
		\$935- two kits, textbook, Strengths book, uniforms and shoes, and scantrons
		Enter the URL for other program cost information available on your institution's website pursuant to Sec. 668.43(a):
		http://www.mcc.edu/financial_aid/fa_cost.shtml



Debt at Program Completion

Q INSTITUTION OPE ID ∀ Q PROGRAM INFORMATION	Charles Stewart Mott Communit CIP Program Name: Cosmetology/Cos	
COST DEBT AT PROGRAM COMPLETION PROGRAM COMPLETION IN NORMAL TIME JOB PLACEMENT CONTEXT	19 Of the 19 completers reported above, eresult of attendance in this program (op For all students (both borrowers and not students)	enter the number completing with any student loan debt as a obtional):
	Title IV student loan debt: Private loan debt: Institutional financing plan debt:	7675 6391 0

Program Completion in Normal Time

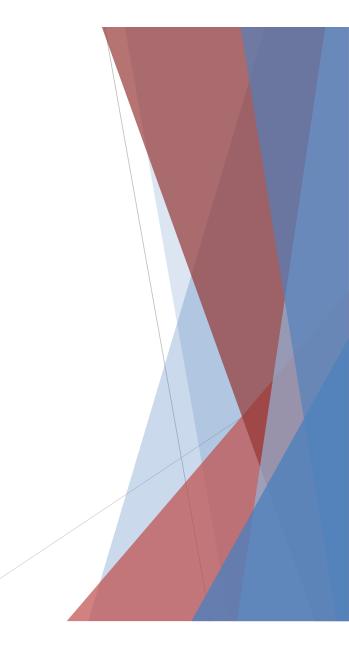
O INSTITUTION OPE ID	Charles Stewart Mott Community College (002261)					
PROGRAM INFORMATION	CIP Program Name: Cosmetology/Cosmetologist, General					
Q COST ∀	Enter the normal time to complete the program as published in your institutional catalog or other publications. Please enter the amount in whole numbers (e.g., no fractions):					
C DEBT AT PROGRAM COMPLETION	publications. Flease enter the amount in whole numbers (e.g., no fractions).					
PROGRAM COMPLETION IN NORMAL TIME	36 weeks months years					
O JOB PLACEMENT	Of the 19 students who completed the program between July 1, 2014 and June 30, 2015, enter the number who completed the program within the normal time, as reported above:					
	19					

Job Placement

9	INSTITUTION OPE ID	Charles Stewart Mott Community College (002261)
FOA	PROGRAM INFORMATION	CIP Program Name: Cosmetology/Cosmetologist, General
10 V	COST	Select the option that applies. Are you required to calculate a job placement rate for the program
è	DEBT AT PROGRAM COMPLETION	completers by:
Q Q	PROGRAM COMPLETION IN NORMAL TIME	Your accrediting agency.
4	JOB PLACEMENT	Your state.
1	JUB PLACEMENT	Both (accrediting agency and state).
0	CONTEXT	We are not currently required to calculate a job placement rate for program completers.

Create





Published Disclosure

Charles Stewart Mott Community College

Cosmetology Certificate

COST

FINANCING

Program Level - Undergraduate certificate Program Length - 24 months

- Q. How much will this program cost me?*
- A. Tuition and fees: \$4,937 Books and supplies: \$1,497 On-campus room & board: not offered

What other costs are there for this program?

For further program cost information click here.

* The amounts shown above include costs for the entire program, assuming normal time to completion. Note that this information is subject to change.

- O. What financing options are available to help me pay for this program?
- A. Financing for this program may be available through grants, scholarships, loans (federal and private) and institutional financing plans. The median amount of debt for program graduates is shown below:

Federal loans: \$7,675 Private education loans: \$6,391 Institutional financing plan: \$0 Q. How long will it take me to complete this program?

E)

PRIN

A. The program is designed to take 24 months to complete. Of those that completed the program in 2014-2015, 100% finished in 24 months.

SUCCESS

- O. What are my chances of getting a job when I graduate?
- A. The job placement rate for students who completed this program is *%.

* This institution is not currently required to calculate a job placement rate for program completers.





Certifications

Certifications

Certifications:

- Required of all Title IV institutions offering GE programs:
 - ► GE program certifications:
 - 1. Is approved by a recognized accrediting agency or is otherwise included in the institution's accreditation by its recognized accrediting agency or, if the institution is a public postsecondary vocational institution, is approved by a State agency recognized to approve such programs in lieu of accreditation;
 - 2. 2.1s programmatically accredited if such accreditation is required by a Federal governmental entity or by a governmental entity in the State in which the institution is located or in which the institution is otherwise required to obtain State approval under 34 CFR 600.9; and
 - 3. 3.In the State in which the institution is located or in which the institution is otherwise required to obtain State approval under 34 CFR 600.9, satisfies the applicable educational prerequisites for professional licensure or certification requirements in that State so that a student who completes the program and seeks employment in that State qualifies to take any licensure or certification examination that is needed for the student to practice or find employment in an occupation that the program prepares students to enter.

Source: Gainful Employment Electronic Announcement #54 - Certification Requirements for Gainful Employment Programs (6/11/15) http://ifap.ed.gov/eannouncements/061115GECertificationsFinalJune9.html

- ECAR (Eligibility and Certification Approval Report):
 - Required of all Title IV institutions offering GE programs
 - GE Disclosure(s) must be posted prior to ECAR approval

Questions?

Discussion...