

NASFAA TASK FORCE REPORT



CONSUMER INFORMATION



**The National Association
of Student Financial Aid
Administrators (NASFAA)
provides professional
development for financial
aid administrators; advocates
for public policies that increase
student access and success;
serves as a forum on student
financial aid issues, and is
committed to diversity
throughout all activities.**



NATIONAL ASSOCIATION OF STUDENT FINANCIAL AID ADMINISTRATORS

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Introduction

The NASFAA Consumer Information Task Force was convened to conduct a thorough review of the current student consumer information requirements and propose ways to streamline both the content and delivery of those requirements. The proposals in the following report were produced for incorporation into NASFAA's full set of recommendations for the reauthorization of the Higher Education Act and seek to:

- Eliminate duplicative disclosures;
- Differentiate appropriate disclosures for undergraduate vs. graduate students;
- Improve the form and format of disclosures and provide flexibility for schools to determine the most effective form and format for their students;
- Identify when disclosures are actually needed and most meaningful, particularly those disclosures not directly related to Title IV aid;
- Consider who should distribute different disclosures (e.g., the school itself or, using reports from schools, the federal government);
- Examine the effectiveness of current loan counseling and explore the need to counsel students about managing their debt and repayment;
- Identify improvements for the content and process (including the source and the division of responsibility) of disclosures surrounding private lender lists.

The Consumer Information Task Force was directed to incorporate the following guiding principles into their recommendations:

- Promote policies that address the needs of disadvantaged students;
- Recommend policies that accommodate the diversity of information delivery models;
- Promote fairness and equity for students across all sectors of postsecondary education;
- Promote accountability;
- Encourage simplicity;
- Provide schools with the flexibility to respond to the specific needs of their students;
- Promote the use of technology wherever possible;
- Eliminate statutory requirements that use financial aid to enforce unrelated social policies;
- Support recommendations with research and data analysis wherever possible; and
- Promote programs and efforts that encourage student financial and academic preparation at an early age.

The convened task force evaluated current consumer information requirements and has provided a series of recommendations for consideration by lawmakers and the policy community. Members of the task force were assigned to examine specific requirements, and the work of each individual was reviewed collaboratively and condensed into recommendations. In addition, recommendations from the full NASFAA Reauthorization Task Force related to consumer information were reviewed and incorporated into the work of this group.

The task force conducted its work between November 2013 and June 2014, and its recommendations were accepted and approved by the NASFAA Board of Directors in June 2014.

Executive Summary

The National Association of Student Financial Aid Administrators (NASFAA) Consumer Information Task Force was convened by the NASFAA Board of Directors to conduct a thorough review of the current student consumer information requirements and propose ways to streamline both the content and delivery of those requirements. The task force comprised a geographically diverse group of NASFAA members from all types of postsecondary institutions and sectors. They met several times, both in-person and via conference call, and engaged in healthy, challenging, and innovative discussions regarding consumer information.

Based on the research and discussions the task force developed, and the NASFAA Board accepted and endorsed, the full set of recommendations are detailed in this report. Highlights of some of those recommendations are summarized below:

1. Eliminate the annual notice and use the College Navigator as the primary way to disseminate information to students and parents.

Institutions already report the majority of the required consumer information in the annual Integrated Postsecondary Data System (IPEDS) Survey which is, in turn, displayed on the College Navigator website for use by students, their parents, and other members of the public. A review of current websites hosted by the Department of Education (ED) shows that the College Navigator is a viable platform that could be enhanced to serve as the central point of reference for participating institutions' student consumer information. Enhancements to the data provided by institutions would eliminate the need to send a separate Notice to students with the same information and would permit institutions to provide a link to the College Navigator as the single source standardized information for prospective and continuing students. This would reduce duplication of information, standardize the presentation and delivery of required information and facilitate cross-school comparisons by students and parents.

2. Repeal the ban on the federal-level student unit record and work to develop a limited student unit record that collects more accurate and comprehensive data on contemporary student behavior.

A federal student unit record would allow student-level data to be sent to ED, rather than the current system of aggregated institutional data captured in IPEDS. For purposes of postsecondary education, a student unit record would allow for the assessment of, among other things, student success (including transfer rates), completion rates, and salaries by major or program. It could also follow students as they move through and between postsecondary institutions and into the workforce. More importantly it would address current shortcomings with IPEDS.

3. Conduct a study to determine the usefulness and utility of the Campus Security Report, Fire Safety Report and the Fire Log, and Drug and Alcohol Prevention Information.

These disclosures, while well-intentioned, are not related to Title IV aid and it is unclear if an institutional disclosure is the most effective way to communicate the information referenced above, or if the preponderance of students and families, prospective and current, find this information useful for making safe and informed choices. Considering the not insignificant burden involved in gathering this information and issuing these disclosures, these are questions that must be studied, and answered.

4. Eliminate non- Title IV related requirements concerning Constitution Day, Voter Registration, and Athletic Disclosures from Title IV administration.

These provisions specifically have no bearing on Title IV student financial aid and further confuse students who are generally overwhelmed by the already considerable volume of consumer information they receive. This lessens the impact and visibility of meaningful and necessary disclosures.

5. Make the Department of Education and loan servicers responsible for developing and distributing loan-related consumer information, including debt management.

ED has traditionally crafted these materials, media, and processes with a one-size-fits-all approach, which rarely fits most. This process needs a better quality assurance process and a better alignment of the timing of information with the need for it.

6. Reconsider the exclusive use of first-time/full-time degree- or certificate-seeking students in the calculation of graduation and retention rates.

Many schools have larger transfer populations than first-time/full-time students, so identifying the appropriate metric to capture that student population would be beneficial to those students in their college search process. Additionally, the review should include part-time students so as to achieve a more realistic picture at community colleges and for-profit institutions.

7. Designate a loan entrance counseling "safe harbor."

Allowing that institutional use of entrance loan counseling provided by ED meets statutory requirements reduces the risk of misinterpretation by the institutions making good faith efforts to employ entrance loan counseling and ensures that students receive the counseling intended under law. ED has already taken the step to provide for an exit counseling "safe harbor" in regulation; it would seem reasonable in that case to create the same standard for entrance counseling.

8. Exempt graduate programs from requirements that are generally inapplicable to them.

Requirements to provide consumer information should distinguish between undergraduate and graduate students. Required provision of information that is not relevant to, or does not use data pertaining to, graduate students should be restricted to undergraduates.

9. Eliminate from exit counseling the requirement to explain the use of the Master Promissory Note.

This requirement is irrelevant because student borrowers who are graduating are not likely to use the Master Promissory Note (MPN) again. Explaining the MPN lengthens exit counseling while distracting students from more important and pertinent information.

10. Develop and consistently use a consumer testing model when implementing any new consumer information requirements.

In the future, no new requirement should be imposed without prior consumer testing. Moreover, testing should be conducted at the federal level on as many existing consumer information requirements as is feasible, with the goal of improving their effectiveness. Congress should direct ED to conduct such testing of current requirements by a date certain and report on its findings.

The NASFAA Consumer Information Task Force

Task Force Members:

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About NASFAA

The National Association of Student Financial Aid Administrators (NASFAA) is a nonprofit membership organization that represents more than 20,000 financial aid professionals at nearly 3,000 colleges, universities, and career schools across the country. NASFAA member institutions serve nine out of every ten undergraduates in the United States. Based in Washington, DC, NASFAA is the only national association with a primary focus on student aid legislation, regulatory analysis, and training for financial aid administrators. For more information, visit www.nasfaa.org.

Recommendations

1. College Navigator vs. Annual Notice

Recommendation:

- Eliminate the annual notice and use College Navigator as the primary way to disseminate information to students and parents.

Rationale:

Schools must annually distribute on a one-on-one basis to all enrolled students a Notice that describes the availability of required consumer information. Each disclosure must be described in the Notice and must include contact information for the applicable campus official should the student have questions, wish to obtain the full disclosures, or obtain a paper copy of an electronic Notice. At a minimum the Notice must describe the following information and include instructions on how to obtain it; much of which is already found on various websites for that institution and on the Department of Education's College Navigator website:

- Basic financial aid information
 - Description of all need-based and non-need-based federal, state, local, private and institutional student financial aid programs at the school, including terms and conditions of Federal Direct and Perkins Loans, and for each of these programs:
 - Procedures and forms to apply for financial aid
 - Student eligibility requirements
 - Criteria to select recipients from the pool of applicants
 - Criteria to determine award amounts
 - Rights and responsibilities of federal student aid recipients, including:
 - Criteria for continued eligibility for each student aid program
 - Satisfactory academic progress standards (SAP) and reinstatement criteria
 - Method and frequency of student aid disbursement
 - Terms of any loan received by the student and a sample repayment schedule for sample loans and necessity to repay them
 - General terms and conditions of employment offered as student aid
 - Exit counseling information for Federal Direct and Perkins Loan Programs
- Contact information for individuals assigned responsibility for consumer information-related assistance
- Family Educational Rights and Privacy Act (FERPA) requirements
 - The notice must inform parents or eligible students that they have the right to:
 - Inspect and review the student's education records;
 - Seek amendment of the student's education records that the parent or eligible student believes to be inaccurate, misleading, or otherwise in violation of the student's privacy rights;
 - Consent to disclosures of personally identifiable information contained in the student's education records, except to the extent that the Act and §99.31 authorize disclosure without consent; and
 - File with the Department a complaint under §§99.63 and 99.64 concerning alleged failures by the educational agency or institution to comply with the requirements of the Act and this part.
- Security and fire safety reports
- Facilities and services for students with disabilities
- Student body diversity
- Cost of attendance, broken down into components
- Refund policy, requirements for withdrawal, and requirements for the return of Title IV financial aid for students who withdraw
- Academic program (degree and other educational or training programs, institutional facilities, faculty and other instructional personnel, and any plans for improving the academic program)
- Eligibility of study abroad for federal student aid

- Transfer of credit policies, articulation agreements, and details of written agreements with other institutions to provide instruction
- Institutional and program accreditation, approval and licensure, and contact information for filing complaints
- Copyright infringement policies, sanctions, and penalties (including computer use and file sharing)
- Vaccination policies
- Retention rate
- Completion/Graduation and transfer-out rates (including disaggregated completion/graduation rates)
- Placement in employment, including types of employment and any placement rates the institution calculates
- Types of graduate and professional education in which the institution's graduates enroll
- Intercollegiate athletic program participation rates and financial support data

In July 2013 the NASFAA Reauthorization Task Force recommended a process where higher education institutions would link to information already reported and available on the Department of Education (ED) website. The process would be totally web driven. This would reduce duplication of information, standardize the presentation and delivery of required information and facilitate cross-school comparisons by students and parents. NASFAA's Reauthorization Task Force indicated that this approach would require institutions to report required details of consumer information requirements and a federal governmental entity would serve as the distributor of the required consumer information disclosures. For example, for each school listed by a student on his/her FAFSA, this governmental entity could provide a side-by-side comparison of consumer information for each of the listed institutions. By driving the information to the student and centralizing it to one agency, the consumer would benefit from a standardized approach. The IPEDS Survey could serve as the vehicle to gather the required data elements that institutions report to ED. In this approach the delivery of nearly all Title IV disclosure requirements to students and the public would shift from the institution's responsibility to the federal government's responsibility using a standardized format. Continuing students would benefit as well. Through this student-centric approach, ED could complement institutional disclosure information with student-specific data already associated with the student within National Student Loan Data System (NSLDS) and the Common Origination and Disbursement (COD) System.

Institutions already report the majority of the required consumer information in the annual IPEDS Survey which is, in turn, displayed on the College Navigator website for use by students, their parents, and other members of the public. A review of current websites hosted by ED shows that the College Navigator is a viable platform that could be enhanced to serve as the central point of reference for participating institutions' student consumer information. Enhancements to the data provided by institutions would eliminate the need to send a separate Notice to students with the same information and would permit institutions to provide a link to the College Navigator as the single source standardized information for prospective and continuing students.

The following recommendations for changes and/or additions to the College Navigator will further enhance its use by prospective and continuing students alike:

- Eliminate from IPEDS the Net Price Calculator and replace this with a link on the College Navigator website to the school's website and their Net Price Calculator.
- Categorize information on the College Navigator to better serve students throughout the life cycle of their college career (i.e., planning for, attending, and completing college). Suggested categories:
 - o Before You Attend
 - o While You're Attending
 - o After You Attend
- Provide links on the College Navigator to additional institutional information. Areas such as FERPA, refund policies, transfer and articulation agreements and information on disability services could be linked to the institution's website.

2. Student Unit Record

Recommendation:

- **Repeal the ban on a federal-level student unit record and work to develop a limited student unit record that collects more accurate and comprehensive data on contemporary student behavior.**

Rationale:

A federal student unit record would allow student-level data to be sent to ED, rather than the current system of aggregated institutional data captured in IPEDS. For purposes of postsecondary education, a student unit record would allow for the assessment of, among other things, student success (including transfer rates), completion rates, and salaries by major or program. It could also follow students as they move through and between postsecondary institutions and into the workforce. More importantly it would address current shortcomings with IPEDS.

IPEDS currently collects graduation rate information based on a cohort of first-time, full-time students, excluding less-than-full-time students or transfer students. This presents an inaccurate picture of performance at two-year institutions and for-profit schools in particular, ignoring the fact that schools in these sectors are largely serving students likely to be excluded from the current graduate rate calculation.

Additionally, a move to a student unit record would address another important shortcoming currently found with IPEDS—the fact that information cannot be updated or supplemented, creating a “snapshot in time” effect; thus the important data elements that a school is judged by are dependent on such a simple thing as when a school submits their information. As higher education policy is increasingly focused on student success, completion, and outcomes, including the recent negotiations over gainful employment regulations, it becomes increasingly critical to have robust data that gives an accurate picture.

3. Consumer Disclosures Not Related to Title IV

Recommendation:

- **Conduct a study to determine the usefulness and utility of the Campus Security Report, Fire Safety Report and the Fire Log, and Drug and Alcohol Prevention Information; as well as studying the most effective, and least burdensome, method of disclosure.**

Rationale:

It is unclear if an institutional disclosure is the most effective way to communicate the information referenced above, or if the preponderance of students and families, prospective and current, find this information useful for making safe and informed choices. Considering the not insignificant burden involved in gathering this information and issuing these disclosures, these are questions that must be studied, and answered.

While we strongly support that this information be available to prospective and current students, the scope of these disclosures go beyond financial aid recipients, and have no direct correlation to receiving financial aid. This consumer information must currently be received by all students; as such, they should be relocated to an area of compliance that more holistically assesses an institution’s general fitness for serving a student population. Additionally, the office(s) on campus responsible for sending out these types of non-Title IV disclosures should have a mission more directly correlated with the safety and well-being of all students at an institution.

4. Decouple Constitution Day, Voters Registration, Athletic Disclosures

Recommendation:

- **Eliminate non- Title IV related requirements concerning Constitution Day, Voters Registration, and Athletic Disclosures from Title IV administration.**

Rationale:

Consumer information needs to be usable, easy to understand, and make an impact on student choice. Currently it is too complex and includes provisions for consumer information disclosures that have no relationship to Title IV eligibility. These provisions specifically have no bearing on Title IV student financial aid but instead contribute to the confusion.

5. Loan Consumer Information

Recommendation:

- Make ED and loan servicers responsible for developing and distributing loan-related consumer information, including debt management.
- Better align the timing of information with the need for it.
- Retain the requirement that schools have counselors available to answer questions.
- Require ED to appoint an advisory panel for the purpose of assessing and making recommendations on the quality, sufficiency and processes for providing debt counseling. Panel membership should include representatives from financial services organizations, institutions of higher education and consumer advocacy organizations.

Rationale:

ED has traditionally crafted these materials, media, and processes with a one-size-fits-all approach, which rarely fits most. This process needs a better quality assurance process. Better timing would provide “just-in-time” counseling on options available at the time they are meaningful to the borrower, something schools generally have no control over.

6. Student Right to Know Act: Completion-Graduation Rates and Retention Rates

Recommendation:

- Allow schools to satisfy this disclosure requirement with a prominent link from the school's website to the College Navigator.
- Reconsider the exclusive use of first-time/full-time degree- or certificate-seeking students in the calculation of graduation and retention rates.

Rationale:

The majority of the data required by the Student Right to Know Act is currently reported on the College Navigator and is sourced from IPEDS. With the addition of the graduation rates for the disaggregated categories to IPEDS, the College Navigator could be the central repository for such information. The regulatory requirement for schools would then be a prominent link from the school's website to the College Navigator.

There should also be a review of the value of exclusively using first-time/full-time degree or certificate seeking students in the calculation of graduation and retention rates. Many schools have larger transfer populations than first-time/full-time students, so identifying the appropriate metric to capture that student population would be beneficial to those students in their college search process. Additionally, the review should include part-time students so as to achieve a more realistic picture at community colleges and for-profit institutions.

Multiple reporting of identical data can lead to conflicting information, especially due to timing issues. Centralizing the IPEDS data at ED and disseminating via the College Navigator reduces that risk and allows students and families to compare schools.

7. Student Right to Know Act: Placement Rates and Graduate/Professional Enrollment of Four-year Degree Graduates

Recommendation:

- Eliminate the vague disclosure requirement to report the placement of, and types of employment obtained by, graduates of the institution's degree or certificate programs.
- Eliminate reporting of post-graduation enrollment in graduate/professional programs.

Rationale:

Non-profit schools are not required to calculate a placement rate. The regulation referenced above requires that all schools disclose the placement of, and types of employment obtained by, graduates of the institution's degree or certificate programs; this is vague, and as such, difficult to accurately comply with. Owing to the limited school population that advertises placement rates and the requirements already established by the surviving portion of the previous gainful employment regulations, the disclosure requirement should apply to only those types of programs.

A student's choice to pursue higher education beyond the bachelor's level is not a metric of their undergraduate program but a function of student choice. It is also difficult to capture such information when a student may decide to pursue a graduate or professional program many years after completing their bachelor's degree. It is a metric without value.

8. Loan Counseling “Safe Harbor”

Recommendation:

- **Direct the Department of Education to provide and maintain entrance and exit loan counseling that satisfies all requirements. Additionally, direct the Department of Education designate that institutions using the provided entrance counseling are automatically in compliance, similar to the provision that already exists for exit counseling.**

Rationale:

If entrance counseling is currently conducted online or through interactive electronic means, the school must take reasonable steps to ensure that each student borrower receives the counseling materials, and participates in and completes the entrance counseling, which may include completion of any interactive program that tests the borrower’s understanding of the terms and conditions of the borrower’s loans. This requirement provides certain components that must be included in entrance counseling.

Amending this requirement to state that institutional use of entrance loan counseling provided by ED (currently at Studentloans.gov) meets all statutory requirements for entrance loan counseling reduces the risk of misinterpretation by the institutions making good faith efforts to employ entrance loan counseling and ensures that students receive the counseling intended under law. The exchange of an electronic indicator that the student completed exit counseling through the ED website is more effective and reliable than assuming students read information sent to them in the mail. This provision, however, would not prevent institutions from developing additional information to share with students regarding their loan obligation.

ED has already taken the step to provide for an exit counseling “safe harbor” in regulation 685.304(b)(8)(ii), effective 7/1/2014; it would seem reasonable in that case to create the same standard for entrance counseling.

9. Intended Audience

Recommendation:

- **Restrict the required provision of consumer information regarding metrics and other information generally inapplicable to graduate students, to undergraduate students.**

Rationale:

Requirements to provide consumer information should distinguish between undergraduate and graduate students. Required provision of information that is not relevant to, or does not use data pertaining to, graduate students should be restricted to undergraduates.

10. Debt Metrics

Recommendation:

- **Use consistent metrics when presenting borrowing levels.**

Rationale:

The consumer information requirement referenced in the statutory citation states that entrance loan counseling must inform the student borrower of sample monthly repayment amounts based on student levels of indebtedness of Direct Subsidized Loan, Direct Unsubsidized Loan borrowers, or student borrowers with Direct Subsidized, Direct Unsubsidized, and Direct PLUS Loans depending on the types of loans the borrower obtained or the average indebtedness of other borrowers in the same program at the same school as the borrower.

While this information is useful, the metric used here (average) is inconsistent with other ED resources. For example, the Shopping Sheet presents prospective borrowers with the median level of indebtedness at any given institution. Inconsistent presentation of data can confuse prospective borrowers and may result in institutional misrepresentation of data, regardless of the school’s good faith efforts to provide accurate information.

ED should choose either median or average debt and use this measure consistently across all consumer information platforms and publications.

11. Individual Contact Information in Entrance Loan Counseling

Recommendation:

- Questions about the borrower's rights and responsibilities or the terms and conditions of the loan should be directed to general contact information for the institution's financial aid office or other office that has responsibility for providing this assistance.

Rationale:

Currently, institutions are required to provide the name of and contact information for the individual the borrower may contact should the borrower have any questions about the borrower's rights and responsibilities or the terms and conditions of the loan. Providing general, rather than individual, contact information increases the likelihood that the borrower will be assisted within a reasonable timeframe. Furthermore, it can be difficult to maintain specific contact information when considering personnel changes.

12. Explanation of Master Promissory Note in Exit Loan Counseling

Recommendation:

- Eliminate from Exit Counseling, the requirement stating that Federal Direct Loan and Federal Perkins Loan Exit Counseling must explain the use of the Master Promissory Note.

Rationale:

These requirements are redundant (they are also required for entrance counseling). In many cases they are irrelevant because student borrowers who are graduating are not likely to use the MPN again. Either way, they lengthen exit counseling and constitute "white noise" that distracts students from more important information they need to assimilate from exit counseling.

13. FFELP Benefits

Recommendation:

- Add a requirement that Direct Loan exit counseling must explain if the Direct Loan Program will honor borrower benefit programs offered to FFELP borrowers when FFELP loans were made, if the borrower consolidates FFELP loans into a Direct Loan. Require the Secretary to disclose the Department of Education's position on this annually.

Rationale:

Federal Direct Loan and Federal Perkins Loan exit counseling must provide information on the effects of loan consolidation including, at minimum: (1) effects of consolidation on total interest to be paid, fees to be paid, and length of repayment; (2) effects of consolidation on a borrower's underlying loan benefits, including grace periods, loan forgiveness, cancellation, and deferment opportunities; (3) options available to the borrower for prepaying the loan and changing repayment plans; and (4) that borrower benefit programs may vary among different lenders. Most of the nation's still-outstanding FFELP loans that are consolidated will be consolidated by the Direct Loan Program. ED can set a single, national standard for the disposition of benefits promised borrowers when their loans were originated and should do so in the interest of transparency.

14. Eliminate Requirement To Provide Information About State Grant Assistance

Recommendation:

- Eliminate the Program Participation Agreement (PPA) requirement that schools provide information about state grant assistance to all eligible Direct Loan borrowers in favor of information maintained by ED on a Website that is also linked to the FAFSA.

Rationale:

This information should be available on the ED website, and current technology also allows ED to display this information when a student completes the FAFSA.

15. Consumer Testing

Recommendation:

- **Develop and consistently use a consumer testing model when implementing any new consumer information requirements.**

Rationale:

In the future, no new requirement should be imposed without prior consumer testing. Moreover, testing should be conducted at the federal level on as many existing consumer information requirements as is feasible, with the goal of improving their effectiveness. Congress should direct ED to conduct such testing of current requirements by a date certain and report on its findings by a subsequent date certain. The law should also provide a timeframe for testing of new statutory requirements that may be imposed in future, with a report due to Congress within a given timeframe; final implementation of any new requirement should take place only after Congress has had an opportunity to review the report.

The need for such testing was clearly demonstrated by a study conducted by NASFAA in 2013 in which consumer testing was performed on three different types of financial aid award letters and all three letters received less than satisfactory scores from the study participants. The feedback from this study conclusively demonstrated the need for required consumer testing; had any of these three letters been mandated, it likely would have been met with confusion, dissatisfaction, and otherwise unnecessary customer service contacts at institutions. Required testing of consumer information disclosures would provide an opportunity to improve the final product based on the input of the very consumers the disclosures are meant to assist.

In performing such testing, the law should require ED to develop and implement a standard model for consumer testing, incorporating the following guidelines:

- Focus groups of 10-20 individuals should be used to test a disclosure
- Focus groups should be held in geographically diverse areas, and of sufficient number to ensure results that are significant and meaningful
- Focus groups should be comprised to ensure diversity of:
 - School sector
 - Student and parent income levels
 - Traditional and non-traditional students
- Multiple stakeholders at different stages in the financial aid process should be represented in the focus groups:
 - Prospective students
 - Current students
 - Parents
 - Students who have already graduated (where applicable)
- An effort should be made to emphasize the inclusion of low-income families (identified through Pell-eligibility). These families are less likely to have access to peer support networks with knowledge of the financial aid process, making their use and understanding of consumer disclosures a more critical concern
- Testing should seek to assess comprehension and pertinence
- Behavioral economists should be included in the design and implementation of the focus groups

Additionally, the focus group testing should, at a minimum, address the following questions:

- Is this disclosure clear and easy for parents or students to understand?
- Which component(s) of the disclosure do students or parents value?
- Which component(s) are unclear or confusing?
- What information are students or parents seeking in the disclosure?
- Do students or parents understand basic concepts after reviewing the disclosure?
- Is this your preferred delivery method to receive this information?
- What would be the most useful time of year to receive this disclosure?
- What would be the most useful stage in the educational lifecycle to receive this disclosure?

Appendix: List of Currently Required Student Consumer Information Disclosures

I) Notice to Enrolled Students

Notice of the availability of the following disclosures the institution must make concerning:

- Available financial assistance;
- Terms and conditions of Title IV loans;
- Financial aid eligibility requirements and application procedures;
- Rights and responsibilities of Title IV aid recipients;
- Standards for maintaining satisfactory academic progress (SAP) and regaining eligibility;
- Methods by which financial aid is disbursed;
- Method for providing Pell-eligible students a way to obtain or purchase required books and supplies;
- Terms and general conditions of any employment provided as part of financial aid package;
- Title IV loan exit counseling information institution provides and collects;
- Costs of attending the institution;
- Requirements of any applicable refund policy;
- Requirements for officially withdrawing from the institution;
- Requirements for the return of Title IV funds if a student withdraws from school;
- Certain information about institution's academic programs;
- Information about entities that accredit, approve, or license the institution and its programs, including contact information for filing a complaint;
- Facilities and services available to students with disabilities, including students with intellectual disabilities;
- Information about institutional personnel designated as available for disseminating consumer information;
- Availability of Title IV funds for study abroad, if approved for credit by home institution;
- Institutional policies and sanctions related to copyright infringement;
- Description of institution's transfer credit policies;
- Certain information about institution's consortium and contractual agreements, if applicable;
- Annual security report;
- Annual fire safety report, if required;
- Institution's report on athletic program participation rates and financial support data, if applicable;
- Institution's retention rate as reported to IPEDS;
- Graduation or completion rate, and, if applicable, transfer-out rates of school's undergraduates;
- Placement of, and types of employment obtained by, graduates of the institution's degree or certificate programs;
- Types of graduate and professional education in which graduates of institution's 4-year degree programs enroll, if applicable; and
- Rights under the Family Educational Rights and Privacy Act (FERPA)

II) Completion or Graduation Rates

- Completion or graduation rate, and, if applicable, transfer-out rate for a specific cohort of certificate- or degree-seeking first-time, full-time undergraduates
 - Transfer-out rate required if school's mission includes providing substantial preparation for students to enroll in another eligible institution
 - Disaggregate by gender, each major racial and ethnic subgroup (as defined in IPEDS), recipients of a Federal Pell Grant, or Direct Subsidized Loan who did not receive a Federal Pell Grant, and Title IV recipients who did not receive a Federal Pell Grant or Direct Subsidized Loan
- Data should be disaggregated only if the number of students in a grouping is sufficient to yield statistically reliable information and reporting will not reveal personally identifiable information about an individual student
- If the number of students in a grouping is too small to be meaningful, the institution should note it enrolled too few of such students to so disclose or report with confidence and confidentiality
- Students are considered to have received Title IV aid if they received funds during the period in which the cohort was established
- Documentation of how data were compiled and calculated

III) Completion or Graduation Rates of Undergraduate Student Athletes

(Schools offering athletically-related financial aid)

- Data, by race and gender, on number of students enrolled and number who received athletically-related financial aid during the prior year
- Certain completion or graduation rate data and, if applicable, transfer-out rates for a specific cohort of certificate- or degree-seeking first-time, full-time undergraduates
- Transfer-out rate data required only if school's mission includes providing substantial preparation for students to enroll in another eligible institution
- Certain completion or graduation rate data and, if applicable, transfer-out rate data for students who received athletically-related student aid broken down by race and gender within basketball, baseball, football, cross-country and track, and all other sports combined
- Documentation of data and how data were calculated and compiled

IV) Report on Athletic Program Participation Rates and Financial Support Data

(Coeducational institutions having an intercollegiate athletic program)

- Participation rates and financing of men's and women's sports in intercollegiate athletic programs at coeducational schools
- Data on revenues, total expenses, and operating expenses of athletic programs
- Data on athletically-related aid
- Certain information regarding athletic coaching staff

V) Campus Security Report

(Does not apply to foreign schools)

- Required crime statistics for 3 most recent calendar years
- Procedures for reporting on-campus crimes and other emergencies and policies concerning the institution's response
- Policies concerning security of and access to campus facilities, as well as security considerations in the maintenance of campus facilities
- Policies concerning campus law enforcement that address enforcement authority of security personnel, encourage accurate and timely reporting of all crimes to appropriate police agencies, and encourage pastoral/professional counselors to inform counselees to report crimes on a voluntary, confidential basis for inclusion in the institution's crime statistics
- Programs (type and frequency) to inform students and employees about campus security procedures and to encourage responsibility for their own security and the security of others
- Programs to inform students and employees about the prevention of crimes
- Policy concerning the monitoring and recording, through local police agencies, of criminal activity at off-campus locations of officially recognized student organizations
- Policy regarding the possession, use, and sale of alcoholic beverages and enforcement of state underage drinking laws
- Policy regarding the possession, use, and sale of illegal drugs and enforcement of federal and state drug laws
- Drug or alcohol abuse education programs or cross-reference to materials used to comply with drug-free campus requirements
- Programs to prevent sexual offenses and procedures to follow when a sexual offense occurs
- Direction on where campus community may find law enforcement agency information on registered sex offenders who may be on campus
- Campus policies regarding emergency response and evacuation procedures
- Campus missing student notification policies and procedures for students who reside in on-campus student housing
- Documentation of data, calculations, and how report is compiled

VI) Fire Safety Report

(Required if institution provides on-campus student housing)

- Fire statistics for each on-campus student housing facility for 3 most recent calendar years
- Description of each on-campus student housing facility fire safety system
- Number of fire drills during previous calendar year
- Policies or rules on portable electrical appliances, smoking, and open flames in on-campus student housing facilities
- Procedures for evacuation from student housing facilities in case of a fire
- Policies regarding fire safety education and training programs provided to students and staff
- Titles of each person or organization to which students and employees should report a fire occurred
- Any plans for future improvements in fire safety
- Documentation of data calculations and procedures on how report is compiled

VII) Fire Log

(Required if institution provides on-campus student housing)

- Fire log of all fires in on-campus student housing facilities, including the nature, date, time, and general location of each fire

VIII) Financial Assistance Information

- Information about available federal, state, local, private, and institutional need-based and non-need-based aid programs
- For each aid program:
 - Procedures and forms necessary to apply; and
 - Student eligibility criteria
- Criteria school uses to select aid recipients and determine award amounts
- Rights and responsibilities of aid recipients including:
 - Criteria for continued eligibility under each aid program;
 - Standards of SAP and criteria for re-establishing eligibility if student has failed to maintain SAP;
 - Method and frequency of financial aid disbursements;
 - Terms and sample repayment schedule(s) for loan(s) awarded, and the necessity for repaying loans;
 - Terms and general conditions of any employment provided as financial aid;
 - Verification deadlines and consequences of failing to comply with documentation requests (for students selected for verification);
 - Terms and conditions for Title IV loans students receive;
 - Exit counseling information the institution provides and collects; and
 - Way school provides for Federal Pell Grant eligible students to obtain or purchase required books and supplies by the seventh day of a payment period, and how the student may opt out

IX) Institutional Information

- Costs of attending institution, including:
 - Tuition and fees charged to full-time and part-time students;
 - Estimates of costs for necessary books and supplies;
 - Estimates of typical room and board charges;
 - Estimates of transportation costs; and
 - Any additional costs for program in which student enrolls or expresses specific interest
- Any refund policy with which school must comply for returning unearned tuition, fees, or other refundable costs paid to school
- Requirements and procedures for officially withdrawing from school
- Summary of requirements for the return of Title IV grant or loan funds when students withdraw before completing payment period or enrollment period
- Information about academic programs, academically related facilities, faculty and other instructional personnel, and any plans for improving the academic program
- Names of associations, agencies, or governmental bodies that accredit, approve, or license the institution and its programs, as well as procedures for reviewing school's accreditation, licensing, or approval documents
- Facilities and services available to students with disabilities, including students with intellectual disabilities
- Information about institutional personnel designated as available for disseminating consumer information
- Availability of Title IV funds for study abroad, if approved for credit by home institution
- Institutional policies and sanctions related to copyright infringement
- Description of institution's transfer credit policies
- Information about institution's consortium and contractual agreements, if applicable
- Contact information for filing a complaint with the institution's accrediting agency and appropriate state agency or entity
 - Must provide contact information not only for state(s) in which institution is physically located, but also for each state in which the institution provides distance education courses to students
- Diversity of student body, including percentage of fulltime students who are male, female, received a Federal Pell Grant, and are a self-identified member of a major racial or ethnic group
- Institution's retention rate as reported to IPEDS
- Placement of, and types of employment obtained by, graduates of degree or certificate programs, including:
 - Any placement rate the institution calculates (voluntarily or involuntarily) for any program;
 - Sources of data; and
 - Time frame and methodology associated with the data
- Types of graduate and professional education in which graduates of the institution's 4-year degree programs enrolled, if applicable, including:
 - Sources of data; and
 - Time frame and methodology associated with the data
- Institutional policies regarding vaccinations

X) Job Placement Rate Information

(Required if institution advertises rates as a means of attracting students)

- Most recent available data concerning employment statistics, graduation statistics, and any other information necessary to substantiate truthfulness of advertisements
- Relevant state licensing requirements of the state in which school is located, for any job for which an educational program offered by the school is designed to prepare prospective students

XI) Gainful Employment Disclosures

- For each of its program that prepare a student for gainful employment in a recognized occupation, institution must disclose:
 - Occupations [by name and Standard Occupation Classification (SOC) code] and links to occupational profiles on Occupation Network (O*Net), or successor website];
 - On-time graduation rate for students completing the program;
 - Program length (normal time to complete the program);
 - Tuition and fees charged for completing the program within normal time;
 - Typical costs for books and supplies (unless included in tuition and fees), and room and board, if applicable;
 - Placement rate for students completing the program, using the methodology specified in 668.6(b)(1)(iv); and
 - Median loan debt from Title IV loans, private education loans, and the institution's financing plans incurred by students who completed the program

XII) FERPA

- Notification that eligible student (or parent) has right to:
 - Inspect and review student's education records;
 - Request amendment of student's education records believed to be inaccurate, misleading, or otherwise in violation of student's privacy rights;
 - Request hearing (if request for amendment is denied) to challenge contents of education records;
 - Consent to disclosures of personally identifiable information contained in student's education records;
 - Copy of information disclosed to other parties, including the identification of parties to which information was disclosed; and
 - File complaint with ED concerning alleged failures by school to comply with FERPA requirements
- The notice also should:
 - Outline procedures for reviewing and seeking amendment to education records;
 - Indicate information school designates as directory information and inform student of right to refuse its disclosure; and
 - Specify criteria for determining who constitutes school official and what constitutes legitimate educational interest, if school has policy of disclosing education records to such officials without student's consent

XIII) Campus Security Crime Log

(Required if institution maintains campus police or security department)

- Daily crime log of any crime reported to campus police or campus security department that occurred on campus, in or on non-campus buildings or property, on public property, or within patrol jurisdiction of campus police or campus security department

XIV) Campus Security Timely Warnings

- Warnings to campus community of certain crimes (list of crimes found in FSA Handbook):
 - Reported to campus security authorities or local police agencies;
 - Occurring on campus, in or on non-campus buildings or property, and on public property;
 - Are considered to represent a threat to students and/or employees

XV) Penalties for Drug Violations

- For all students, notice of the penalties for drug-related offenses
- For students who have lost eligibility, the ways the student can regain eligibility

XVI) Drug-Free Workplace

- Notification of unlawful activities and school's actions against employees who violate these prohibitions

XVII) Drug and Alcohol Abuse Prevention

- Disclosure of the following information:
 - Prevention of drug and alcohol abuse;
 - Standards of conduct that prohibit, at minimum, unlawful possession, use, or distribution of drugs and alcohol by students and employees on school's property, or as part of school's activities;
 - Clear statement that institution will impose sanctions for standards of conduct violations involving drugs and alcohol, and description of sanctions;
 - Description of legal sanctions under local, state, and federal law for unlawful possession, use, or distribution of illicit drugs and alcohol;
 - Description of drug and alcohol counseling, treatment, or rehabilitation programs available to students and employees; and
 - Description of health risks associated with use of illicit drugs and alcohol



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