

Marketing Best Practices to Meet Federal Disclosure Guidelines



Background

- July 1, 2011 compliance requirements meant Strike Marketing must support its clients:
 - NACCAS board member
 - AACCS Board Member
 - California Board of Cosmetology member
 - Paul Mitchell founder's son
 - 2nd generation, multiple school owner
 - New owners

Best Practices Information Source

- US Department of Education Gainful Employment Operations Manual
- Dear Colleague letter published April 20, 2011
- The National Post Secondary Education Cooperative

Consequences

- “Institutions should ensure that the information disclosed is accurate.
The Department of Education may initiate a fine, or a limitation, suspension, or termination of Title IV HEA eligibility
- for any substantial misrepresentation made by an institution regarding the nature of its educational program, its financial charges, or the employability of its graduates.
 - Source: Summary report by NPEC

Consequences

- *“because the reporting and disclosure requirements are linked to an institution’s participation in the Title IV federal student financial aid programs, the Secretary is authorized to take administrative action, including the imposition of fines against institutions that do not comply. **The most severe penalty the department could impose for failure to comply, however, is a limitation or termination of the institution’s participation in the Title IV financial aid programs.”***
 - Source: National Association of College and University Attorneys

Consequences

- **“Institutions should be aware that posting information on a website is sufficient** for meeting those HEA requirements that institutions make certain information
 - **available** to the public or others.
- A number of the HEA disclosure provisions require that institutions
 - **deliver information directly** to specified individuals, or that it be
 - **provided directly upon request.**
 - **In those cases, posting information on the institution’s website is not sufficient.**
 - An institution may choose to post all of the appropriate HEA disclosure information on its website for information management purposes, but it still must ensure that certain information is also provided directly to the specified individuals. “
 - Source: Summary report by NPEC

Requirements

- The Occupations (by name, NET-SOC code with Link to occupational profiles on O*NET*) that the program prepares students to enter.

Requirements

- The on-time graduation rate for students completing the program.

Requirements

- The tuition and fees the institution charges a student for completing the program within normal time.

Requirements

- The typical costs for books and supplies (unless included as part of tuition and fees), and the cost of room and board, if applicable.

Requirements

- The job placement rate for students completing the program.

Requirements

- The median loan debt incurred by students who completed the program separately by:
 - Title IV loans
 - other educational debt
 - private educational loans
 - institutional financing

Requirements

- “Other information the Secretary provided to the institution about the program”

Location of Disclosure Info

- The institution must provide that information to prospective students in **a simple and meaningful way.**
- The disclosure information about each GE Program **must be on the home page of the specific GE Program** and included in any promotional materials that are made available to those potential students.

Location of Disclosure Info

- The institution **cannot place all the disclosure information on one central Web page** rather than including the disclosures on the home page for each GE Program.
- The required disclosure information must also be included in promotional materials **for that GE Program.**

Location of Disclosure Info

- The institution must also provide a prominent and direct link on any other Web page containing general, academic, or admissions information about the program, to the **GE Program's home web page** that contains all the required information.

Types of Marketing Collateral

- This could include, but is not limited to:
- Postcards
- Invitations/solicitations
- Flyers
- Billboard and transit advertising

Types of Marketing Collateral

- This could include, but is not limited to:
- Radio advertising
- Television advertising
- Web and similar advertising
- Social networks and other new media

Info Location clarification

- If any of these invitations or advertisements mentions or refers to **a specific GE Program(s)**, the disclosure must be included if it is feasible to do so.

Info Location clarification

- If providing the disclosure information is not feasible because of the size or format of the invitation or advertisement, the institutions
- **may display the URL or provide a live link to the Web page** where the required information is located.
- The institution needs to provide a clear explanation about the information that is available at this Web page.

Face-to-face

- Admissions
- Financial Aid

Info Location clarification

- For promotional materials that advertise **more than one GE Program**, the institution has the option of:
 - **providing one link** on the promotional material where prospective students can be redirected to a list of the Web links to all the GE Programs' home Web pages, OR
 - **providing a direct link for each program.**
- This single Web page is in addition to the disclosure information placed on each program's Web page

Consistency

- Presentation of information
 - Bullets point
 - Tables
 - Text
- Website
 - Links: iconic vs. text
 - Content: layout and font consistent with hard copy materials

“go to” source

- Website
 - Prospects
 - Parents
 - Currently enrolled

“go to” source

- Student Handbook
- Disclosure in print is not addressed!
 - Parents
 - Prospects
 - Currently enrolled
 - “Regulators”
 - Department of Education
 - State Licensing agencies
 - Accreditation organizations

Your anchor

- Catalog/Student Handbook
 - Why should it be? –
Because it is in print and able to be proofed.
 - The information in it can be copied verbatim to the website.

Best Practices*

1. Focus both on compliance and communication.
2. Develop a single web page on the institution's website that provides hyperlinks to the HEA disclosure information.
3. Adopt a "three-click" approach.
4. Use consumer-friendly labels and language whenever possible, and avoid institutional/technical jargon.
5. Use a common set of content titles.

— *Source: NPEC

1. Focus both on compliance and communication.

- **Align** web consumer information with how your school presents information to prospective or current students.
- Group disclosure information under the same heading style.
- **Make sure links are working!**

1. Focus both on compliance and communication.

- Present data in a **visually appealing and easily understood** format
 - tables
 - charts

1. Focus both on compliance and communication.

- Determine **who is responsible** for
 - Gathering the information
 - leading the development of the web page
 - monitoring its accuracy over time.

1. Focus both on compliance and communication.

– Accountability

- Have a lead staff person to:
 - Identify the required disclosures
 - The office responsible for the information
 - Designate the contact person.

- Have a **systematic approach** to collecting the necessary information.

2. Develop a single web page on the institution's website that provides hyperlinks to the HEA disclosure information

- **by Program**

- Be certain labeling of web pages is consistent.

3. Adopt a “three-click” approach.

- Place a link on the Home page that can reach the consumer information web page in “three-clicks.”
- In an easily accessible or “shallow” location
- Use an icon/graphic

3. Adopt a “three-click” approach.

- Most common is a link to consumer information web page on the home page.
- **Rethink** your access if it is a the link at the bottom of the main home page in a small font.
- Net Calculator – preferred position Home page **above the fold**


4. Use consumer-friendly labels and language whenever possible, and avoid institutional/technical jargon.


– Adopt “Your Right to Know”


– Strike Marketing has developed a set of graphic files around “Your Right to Know”.


It's
your
right
to
know


It's
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know

It's your 
right to know

It's your 
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It's your
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Poster sets will arrive in early November

5. Use a common set of content titles.

- Schools do not use the same terms to label or title the web page.
- Initiative suggested to AACCS Board to consider providing “labeling” guidelines/terminology.

Did You Know?

- There was a reporting template that was posted for 30 day review on January 20, 2012.
- Template development continues.
- No release date has been set

Example #1

- Course specific
 - <http://www.sfiec.edu/sfiec/cosmetology/index.cfm>
- <http://www.northwesthairacademy.edu/html/policies/index.cfm>
- <http://www.paulmitchelltheschoolportland.com/html/policies/index.cfm>

Examples #2

- <http://www.empire.edu/consumer-info/pennsylvania>
 - PDF download of info by state by school location
 - Acrobat is ubiquitous
- <http://www.ogleschool.com/programs/student-consumer-information.html>
 - No Home page link
 - Very detailed by school location by course

Examples #3

- www.tiffinacademy.com
- <http://www.regencybeauty.com/>
- <http://www.bellusacademy.edu/>

Resources/References

copy & paste into a browser

- <http://www.ifap.ed.gov/GainfulEmploymentOperationsManual/attachments/GainfulEmploymentOperationsManualMasterFile.pdf>
- <http://nces.ed.gov/pubs2010/2010831rev.pdf>
- <http://nces.ed.gov/pubs2012/2012831.pdf>
- <http://www.ifap.ed.gov/dpcletters/GEN1110.html>
- 2012 reporting template - Google - OMB No. 1845-0107

Discussion

- Your best practices
- Your “audit” experiences
- Finally – **follow your GRT and Tom Netting updates**

Thank You

Text session feedback to 37607
code Disclosure

