

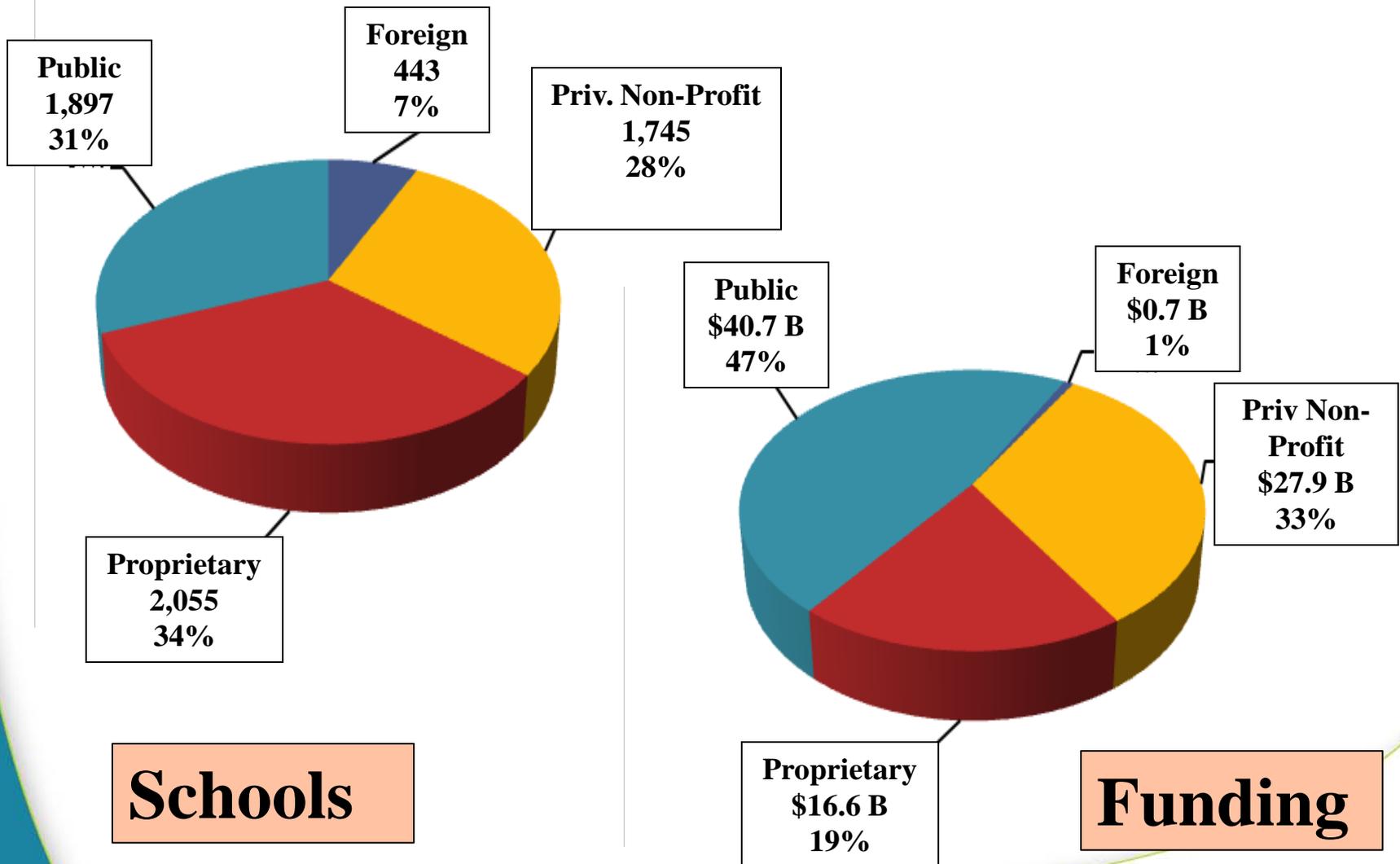


Session # 29

Partnering for Compliance
and Consumer Protection

Robin Minor & Geneva Leon

Participating Schools by Type 2007-2008 AY



Source: National Student Loan Data System (NSLDS) and Campus-Based System.



Program Integrity



Consumer Information

(34 CFR 668 Part D)

- Basic Financial Aid Info - General School Info.
- Misc. Institutional Info.
- Constitution & Citizenship Day
- Drug & Alcohol Abuse Prevention Info.
- Completion/Graduation Rates for Student Athletes



Consumer Information

- Equity in Athletics Disclosure
- Student Right-To-Know
- Clery (Campus Security) Act - *Annual Security Report*
- Family Educational Rights and Privacy (FERPA)
- Safeguarding Customer Information



Common Consumer Related Program Review Findings

- Crime Awareness
Requirements Not Met
- Consumer Information
Requirements Not Met



Misrepresentation Findings

- The institution published false information and made claims - could not substantiate
- Information from student interviews-indicating misrepresentation made
- Misrepresentation - educational program
- Misrepresentation - consumer information or Title IV eligibility



Neg Reg Includes Consumer Protection

- Incentive compensation paid by institutions to persons or entities engaged in student recruiting or admission activities

- **Gainful employment in a recognized occupation**

- State authorization as a component of institutional eligibility
- Definition of credit hour - to determine program eligibility status, particularly in the context of awarding Pell Grants
- Verification of information included on student aid applications
- High school diploma definition as a condition of receiving Federal Student Aid





External Partnerships

- Federal Trade Commission
- Department of Labor
- Federal Bureau of Investigation
- Security and Exchange Commission

- States
- Accreditors
- GAs





External Partnerships

- **Federal Trade Commission**
 - Consumer Sentinel
 - ✓ *What is it?*
 - ✓ *How is it used?*
 - Consumer Information
 - ✓ *Scholarship Scams* www.studentaid.ed.gov/lisa
 - ✓ *Fact Sheets* www.studentaid.ed.gov/pubs
 - Other Partnering Initiatives
 - ✓ *Guides and Publications*



External Partnerships

- **Department of Labor**

- Dictionary of Occupational Titles

- Defines a Recognized Occupation

- www.careeronestop.org

- Careers
 - Salaries and Benefits
 - Education and Training
 - Regional Economic Development

External Partnerships

- **Federal Bureau of Investigation**

- Campus Security Reviews
- Data Analysis



- **Why Partner with the FBI?**

- To provide additional oversight & make our campuses safe for our children & employees today & tomorrow



Clery Requirements 34 CFR 668.46



Jeanne Clery

- Publish an annual report (by Oct 1) disclosing campus security policies & 3 years of crime statistics to students & employees
- Report annually to ED - 3 year crime statistics
- Make timely warnings to campus community about crimes that pose an ongoing threat
- Have a public crime log if you have a police or security department

What Happens on FSA/FBI Review?

- FSA accompanies the FBI on the Quality Assessment Review, (12+ Each Year)
- FBI selects a School within the State Review
- FSA schedules a Clery Review-same week
- FBI reviews most recent reporting of Part I Crimes at the School
- FSA reviews policies & most recent reported year to ED. Includes:
 - Part I & II Crimes & Disciplinary Actions



FSA Assessments

- Self-Assessment Tool Designed to Assist Schools in Evaluating Financial Aid Policies, Processes, & Procedures
- Includes Assessment Modules on Students, Schools, Managing Funds, & Policies and Procedures

<http://www.ifap.ed.gov/qahome/fsaassessment.html>



External Partnerships

- **Security & Exchange Commission (Publicly Traded Schools)**
 - Share data & information w/ SEC
 - Make complaint referrals to & from the SEC Enforcement Division
 - Review SEC actions taken & reported to Lexis Nexis
 - Review SEC Quarterly Statements



External Partnerships

- **State Governmental Offices**
 - Attorney General
 - Assistant US Attorneys
 - Licensing
 - Higher Education



External Partnerships

- **Accreditors – (Regional or National)**
 - Share final outcomes
 - Communicate & coordinate school closures
 - Receive regular accrediting updates



External Partnerships

- **Guaranty Agencies**
 - Program Reviews of Schools
 - Outreach, Technical Assistance
 - Referrals to OIG & Program Compliance



Internal Partnerships

- **Business Operations Reporting Concerns**
 - COD, CPS, NSLDS Systems
 - 100% Direct Loan Transition
- **Office of Postsecondary Education Reporting Concerns**
 - IPEDS
 - Campus Security System



Internal Partnerships

- **Office of Inspector General**
 - Referrals to and from (Investigations & Auditor QCR)
 - Resolution of OIG Audits
 - Data analysis
- **Office of the General Counsel**
 - Qui Tams
 - Advice & Agreements

Contact Info – School Teams

Program Compliance

Victoria Edwards, Chief Compliance Officer – (202) 377-4275

School Eligibility

Robin Minor, General Manager – (202) 377-3173

Call the appropriate School Participation Team for information and guidance on audit resolution, financial analysis, program reviews, school and program eligibility/recertification and school closure information.

School Participation Teams – Northeast

Geneva Leon, Director – Wash DC
(202) 377-3173 geneva.leon@ed.gov

New York/Boston (Connecticut, Maine, Massachusetts, New Hampshire, Rhode Island, Vermont, New Jersey, New York, Puerto Rico, Virgin Islands)

William Swift – New York (646) 428-3750
Rosemary Torpey - Boston (617) 289-0133
Elizabeth Coughlin-New York (646) 428-3737
Patrice Fleming - Wash DC (202) 377-4209

Philadelphia (DC, Delaware, Maryland, Pennsylvania, Virginia, West Virginia)

Nancy Gifford - Philadelphia (215) 656-6442
John Loreng – Philadelphia (215) 656-6437
Michael Frola - Wash DC (202) 377-3364

Foreign Schools

Barbara Hemelt - Wash DC (202) 377-3168

Campus Security

Clifton Knight – Wash DC (202) 377-4244

School Participation Teams-South Central

Carolyn White, Director – Wash DC
(202) 377-3173 carolyn.white@ed.gov

Atlanta (Alabama, Florida, Georgia, Mississippi, North Carolina, South Carolina)

Charles Engstrom - Atlanta (404) 974-9290
Christopher Miller – Atlanta (404) 974-9297
Patricia Dickerson-Wash DC (202) 377-4218

Dallas (Arkansas, Louisiana, New Mexico, Oklahoma, Texas)

Patrick Kennedy - Dallas (214) 661-9490
Janet Dragoo - Dallas (214) 661-9481
Clifton Knight - Wash DC (202) 377-4244

Kansas City (Iowa, Kansas, Kentucky, Missouri, Nebraska, Tennessee)

Ralph LoBosco-Kansas City (816) 268-0410
Dvak Corwin – Kansas City (816) 268-0420
Phillip Brumback-Wash DC (202) 377-3464

School Participation Teams - Northwest

Robin Minor, Acting Director – Wash DC
(202) 377-3173

Chicago (Illinois, Indiana, Minnesota, Ohio, Wisconsin)

Douglas Parrott - Chicago (312) 730-1532
David Heath – Chicago (312) 730-1522
Earl Flurkey – Chicago (312) 730-1521

Denver (Colorado, Michigan, Montana, North Dakota, South Dakota, Utah, Wyoming)

Harry Shriver - Denver (303) 844-4128

San Francisco/Seattle (American Samoa, Arizona, California, Guam, Hawaii, Nevada, Palau, Marshall Islands, N. Marianas State of Micronesia, Alaska, Idaho, Oregon, Wash.)

Linda Henderson- San Fran (415)-486-5609
Martina Fernandez-Rosario (415)-486-5605
Gayle Palumbo (415) 486-5614
Dyon Toney - Wash DC (202) 377-3639



Happy Holidays!!



We Appreciate Your Feedback & Comments

- **Robin Minor (202) 377-3717**
robin.minor@ed.gov
- **Geneva Leon (202) 377-3169**
geneva.leon@ed.gov