

# **Session #44**

## **Foreign Schools Final Regulations & Program Compliance**

**Geneva Leon  
Gail McLarnon  
Joe Smith**



**START HERE**  
**GO FURTHER**  
FEDERAL STUDENT AID®

# Session Description

- This session will discuss current FSA program requirements and common audit findings. Session provides a detailed overview of the recently published Final Regulations affecting foreign schools, and the requirements with which foreign schools must comply to continue participation in FSA's Direct Loan Program.

# Applying For/Maintaining Eligibility

- Initial Certification
- Recertification
- Mergers and Changes in Ownership
- Reinstatement
- Updates (People, Locations, Programs, etc.)
- Voluntary Withdrawal

Submit electronic application updates at  
[www.eligcert.ed.gov](http://www.eligcert.ed.gov)

# Eligibility & Certification Documents

- Approval Documents
  - Program Participation Agreement (PPA)
  - Approval Letter
  - Eligibility and Certification Approval Report (ECAR)
  - Direct Loan PPA Addendum
- Keep these documents together for audit and inspection purposes



# Maintaining Eligibility

- A participating institution's certification ends—
  - At the expiration of the PPA (unless timely recertification application is pending)
  - Institution voluntarily withdraws from participation
  - Change in Ownership or Merger
  - Change in Institution Type
  - Department revokes PPA or terminates participation



# Maintaining Eligibility

- A participating institution must apply for approval if it wishes to continue to participate
  - After expiration of current PPA;
    - Recertification or Reinstatement
  - If it has a change in ownership that results in a change in control; or
  - If it changes status as a for-profit, nonprofit, or public institution.



# Foreign Institution Audits - Current

- **Current** Requirements
  - Two types of audits required
    - Audited Financial Statements
    - Compliance Audits
- Type of compliance audits and financial statements based on institution type and annual Federal Student Aid funding

# Foreign Schools Audit Guide

FOREIGN SCHOOL AUDIT GUIDE

- *Guide* Published by Office of Inspector General
  - OIG is agency watchdog
- Foreign School Audit Guide:
  - Financial Statement Reporting Requirements
  - Compliance Audit Reporting Requirements



[http://www2.ed.gov/about/offices/  
list/oig/nonfed/sfa.html](http://www2.ed.gov/about/offices/list/oig/nonfed/sfa.html)

U.S. DEPARTMENT OF EDUCATION  
Office of Inspector General



START HERE  
GO FURTHER  
FEDERAL STUDENT AID®

# Student Listing for Audit

- *Foreign School Audit Guide* requires independent public accountant to receive student listing
  - Students with Loans Certified During Fiscal Year
  - Amount of Loan Certified
  - Total Amount of Loans Certified For All Students



# Financial Statements - Current

Less than \$500,000 during FY (Low Volume)

- Financial statements presented in accordance with auditing standards and generally accepted accounting principles of home country
- NEW: Foreign Private Non-Profit (PNP) & Public Schools exempt from submitting audited financial statements
  - DCL ID: GEN-09-06



# Financial Statements - Current

\$500,000 or more during FY (High Volume)

- For PNP or Public
  - Translated to provide statements which conform to U.S. Generally Accepted Accounting Principles (US GAAP), and audited in accordance with US Government Auditing Standards (US GAGAS)



# Compliance Audits - Current

- Low Volume
  - Less than \$500,000 USD in Title IV funds each fiscal year (FY)
- Choice:
  - Alternative Compliance Audit  
*or*
  - Standard Compliance Audit
- Required Annually, Fiscal Year Basis
- US GAGAS



# Compliance Audits - Current

- High Volume
  - \$500,000 USD or more in Title IV funds each fiscal year (FY)
- Standard Compliance Audit Required
- Required Annually, Fiscal Year Basis
- US GAGAS



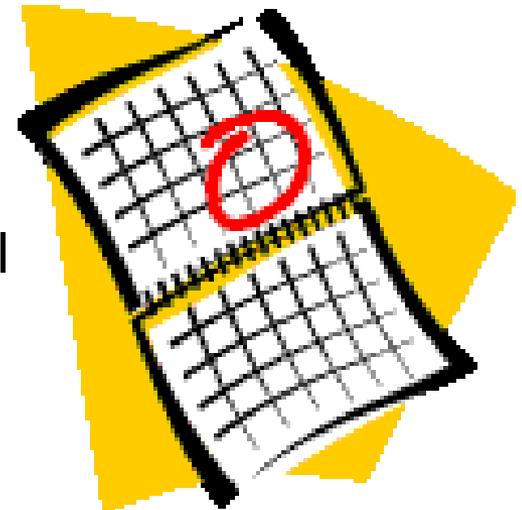
# Audit Due Dates

- Compliance Audit **and** Audited Financial Statements are due no later than six (6) months from the last day of the institution's fiscal year.

## Audit Submission Address

U.S. Department of Education  
Federal Student Aid, School Eligibility Channel  
Document Receipt and Control Center  
830 First Street, NE, Room 71I1  
Washington, D.C. 20202-5340

Phone for shipping label: 202-377-3168



# Current Audit Requirements

Title IV Funds Certified During Fiscal Year	Financial Statements	Compliance Audits
<b>\$500,000 +</b> (High Volume)	US GAAP and US GAGAS	Standard Compliance Engagement
Less than <b>\$500,000</b> (Low Volume)	Home Country GAAP and Auditing Standards  (GEN-09-06: Waiver for Foreign Public and Private Non-Profit Institutions)	Alternative Compliance Engagement**  May opt for Standard Audit
** Foreign For-Profit institutions must always undergo Standard Compliance Engagement Audit		



# Top 10 Audit Findings

- Student Confirmation Report Filed Late/Not Filed/Not Retained/Inaccurate
- Information in Student Files Missing/Inconsistent
- Lack of Administrative Capability
- Improper Certification of FFEL
- Attendance Records Missing/Policy Inadequate



# Top 10 Audit Findings (con't)

- Entrance/Exit Counseling Deficiencies
- Enrollment Status Not Verified Before Disbursement
- Maximum Annual or Cumulative FFEL Award Exceeded
- Return of Title IV (R2T4) Calculation Errors
- FFEL Cost of Attendance Not Documented/Incorrect



# Other Compliance Issues

- Late Submission of Audits and Financial Statements
- Remember:
  - No Use of Telecommunication or Correspondence Courses
  - No Study in the U.S.  
(except clinical)
  - Special Eligibility Criteria for Medical, Veterinary and Nursing Programs



# Foreign Schools Final Regulations

- Agenda
  - Legislative and Regulatory Background
  - General Applicability
  - Eligibility Standards
  - Compliance Audits & Financial Statements
  - Foreign Medical, Nursing and Veterinary School Requirements



# Legislative Background

- Higher Education Opportunity Act (HEOA) amended the Higher Education Act of 1965, as amended (the HEA) provisions related to the eligibility of foreign institutions to participate in the Federal student aid programs
- Public Law 110-315
- Enacted August 14, 2008

# Legislative Background

- HEOA foreign school amendments include:
  - Changes to foreign nursing school eligibility requirements
  - Elimination of campus crime reporting requirements
  - New financial and compliance audit requirements
  - Changes to foreign graduate medical school requirements



# Legislative Background

- Health Care and Education Reconciliation Act of 2010 (HCERA) amended the HEA:
  - Eliminated the Federal Family Education Loan Program
  - Require all new loans to be made under the William D. Ford Federal Direct (Direct) Loan Program as of July 1, 2010
- Public Law 111-152
- Enacted March 30, 2010

# Regulatory Background

- Notice of intent to regulate—May 2009
- Negotiations on Proposed Rules implementing HEOA changes and staff identified issues on Foreign Schools
  - November 16-18, 2009
  - January 11-13, 2010
  - February 22-24, 2010
- Foreign school negotiators reached consensus on proposed regulations



# Regulatory Background

- Notice of Proposed Rulemaking published July 20, 2010
- <http://edocket.access.gpo.gov/2010/2010-17313.htm>
- 30 day comment period ended August 19, 2009
- Final Regulations published November 1, 2010
- <http://www.ifap.ed.gov/fregisters/FR110110ForeignInstitutionsFinal.html>



# Final Rules

## General Applicability

- §600.2—Definition of nonprofit foreign institution
  - Institutions that are owned and operated only by one or more nonprofit corporations or associations; and
    - Is designated a nonprofit educational institution by a tax authority of its country that is recognized by the Secretary; or
    - If the Secretary does not recognize a home country tax authority, demonstrates to the satisfaction of the Secretary that it is a nonprofit educational institution



# Final Rules

## General Applicability

- §668.13—Certification Procedures
  - Foreign institution certification to participate expires—
    - 6 years after the certification date for a public or private non-profit institution
    - 3 years or less after the certification date for a private for profit institution



# Final Rules

## General Applicability

- §600. 51—A foreign institution must comply with all requirements for eligible and participating institutions except:
  - When made inapplicable by the HEA or
  - When the Secretary identifies specific provisions as inapplicable to a foreign institution in a Federal Register notice



# General Applicability

## Definition of Foreign Institution

- §600.52—For the purposes of students who receive title IV aid, an institution that:
  - Is Not located in a State
  - Except for clinical training at graduate medical, veterinary & nursing schools:
    - Has no U.S. locations
    - Has no written arrangements, within meaning of §668.5, with institutions in the U.S. for students enrolled at foreign institutions to take courses from institutions in the U.S.



# Definition of Foreign Institution

- Does not permit students to enroll in any course offered by the foreign institution in the U.S., including research, work, internship, externship, or special studies within the U.S., except that independent research done by an individual student in the U.S. for not more than one academic year is permitted, if conducted during the dissertation phase of a doctoral program under guidance of faculty, and the research can only be performed in a facility in the U.S.



# Definition of Foreign Institution

- §600.52—For the purposes of students who receive title IV aid, an institution that:
  - Is legally authorized by the education ministry, council, or equivalent agency of the country in which the institution is located to provide an educational program beyond the secondary education level
  - Awards degrees, certificates, or other recognized educational credentials in accordance with §600.54(e) that are officially recognized by the country in which the institution is located; or



# Definition of Foreign Institution

- If the educational enterprise enrolls students both within a State and outside a State, and the number of students eligible to receive title IV, HEA funds attending locations outside a State is at least twice the number of students enrolled within a State, the locations outside a State must apply to participate as one or more foreign institutions and meet all the requirements of paragraph (1) of this definition and other requirements of this part.



# Definition of Foreign Institution

- For the purposes of the prior paragraph, an educational enterprise is an entity that consists of two or more locations offering all or part of an educational program that are directly or indirectly under common ownership.

# Eligibility Requirements for Direct Loan Program Participation

- §600.54—A foreign institution is comparable to a domestic institution and eligible to participate in the Direct Loan Program if:
  - Except for freestanding foreign graduate medical, veterinary, and nursing schools, the foreign institution is a public or private nonprofit institution
  - For a public or private nonprofit foreign institution, meets the definition of institution of higher education in §600.4, with certain exceptions



# Eligibility Requirements for Direct Loan Program Participation

- For a for-profit foreign medical, veterinary or nursing school, meets the definition of proprietary institution of higher education in §600.5, with certain exceptions
- The foreign institution admits as regular students only persons who—
  - Completed secondary school; or
  - Have a recognized equivalent of a secondary school completion credential



# Eligibility Requirements for Direct Loan Program Participation

- An eligible foreign institution may not enter into written arrangements whereby an ineligible institution provides any part of one or more of the eligible foreign institution's programs. For this purpose, written arrangements do not include affiliation agreements for the provision of clinical training at foreign medical, veterinary, and nursing schools.



# Eligibility Requirements for Direct Loan Program Participation

- Additional location of a foreign institution must separately meet the definition of foreign institution in §600.52 if
  - It is located outside the country in which the main campus is located, with certain exceptions
  - It is located within the same country as the main campus, but is not covered by the legal authorization of the main campus.



# Eligibility Requirements for Direct Loan Program Participation

- The foreign institution must provide an eligible education program
  - For which it is legally authorized to award degrees that are equivalent to a U.S. associate, baccalaureate, graduate, or professional degree
  - That are at least a 2-academic year programs acceptable for full credit toward the equivalent of a baccalaureate degree awarded in the U.S. or



# Eligibility Requirements for Direct Loan Program Participation

- That are equivalent to at least a *one-academic-year* training program in the U.S. that leads to a certificate, degree, or other recognized educational credential and prepares students for gainful employment in a recognized occupation within the meaning of the gainful employment provisions. The amount of academic work required by a one-year program must equal the definition of academic year in §668.3.



# Eligibility Requirements for Direct Loan Program Participation

- For for-profit foreign medical, veterinary, or nursing schools—
  - No portion of an eligible medical or vet program may be offered at the U.S. undergraduate level and
  - Title IV, HEA program eligibility does not extend to any joint degree program unless allowed under the statute



# Eligibility Requirements for Direct Loan Program Participation

- Proof that a foreign institution is legally authorized to offer educational programs beyond the secondary level may be provided to the Secretary by the appropriate education ministry or equivalent
  - For all eligible institutions in the country;
  - For all eligible institutions in a jurisdiction
  - For each separate eligible institution in the country



# Eligibility Requirements for Direct Loan Program Participation

- §668.171—Foreign institutions are financially responsible if the institution:
  - Notifies the Secretary of its designation as a public institution by the country/government entity with legal authority to make the designation; and
  - Provides appropriate documentation confirming the designation; and



# Eligibility Requirements for Direct Loan Program Participation

- §668.171—Foreign institutions are financially responsible if the institution:
  - Is not in violation of any past performance requirement
- If a foreign public institution does not meet these requirements, financial responsibility is determined under the general financial responsibility standards



# Eligibility Requirements for Direct Loan Program Participation

- Changes to Financial Statement and Compliance Audit Requirements:
  - Section 487(c)(1)(A)(i) of the HEA was amended by the HEOA to give the Secretary the authority to modify the financial and compliance audit requirements for foreign institutions, and the authority to waive the audit requirements for foreign institutions that receive less than \$500,000 in Title IV, HEA program funds in the preceding year.



# Compliance Audits

- Compliance audits performed in accordance with ED OIG's audit guide
- Standard Compliance Engagement is an examination level engagement
- Alternative Compliance Engagement is an agreed upon procedures attestation (AUP) engagement
- Covers Fiscal Year
- Must cover all Title IV, HEA program transactions since last audit
- Due 6 months after Fiscal Year ends



# Compliance Audits

Title IV Funds received during Most Recent Fiscal Year	Public & Private Non-Profit	For-Profit
<b>\$500,000 +</b>	Standard Compliance Audit Submit Annually	
Less than <b>\$500,000</b>	Alternative Compliance Audit Submit Annually	Standard Compliance Audit  Submit Annually
	Alternative Compliance Audit May cover up to 3 fiscal years <b>IF</b> <ul style="list-style-type: none"> <li>• Receive &lt; \$500,000 in most recent FY period</li> <li>• Fully Certified</li> <li>• Two most recent audits were timely submitted and no subsequent late audit submissions</li> <li>• Notified by ED</li> </ul>	

**NOTE:** If a foreign institution has an administrative capability or compliance reporting problem, Secretary may require the compliance audit to be performed at a higher level of engagement, and may require a compliance audit to be submitted annually.



# Compliance Audits

- If funding increases after receiving notification of eligibility for 3-year alternative compliance audit, submit alternative compliance audit together with your standard compliance audit.



# Audited Financial Statements

Title IV Funds received during Fiscal Year	Public & Private Non-Profit		For-Profit
	Home Country GAAP	U.S. GAAP & GAGAS	Home Country GAAP & U.S. GAAP & GAGAS
<b>\$10,000,000 +</b>	Required annually, in English	Required annually, in English	Required annually, in English
\$3,000,000 - <b>\$9,999,999</b>	Required annually, in English	Required annually, in English, may omit for 2 consecutive years after U.S. GAAP & GAGAS audit	
\$500,000 - <b>\$2,999,999</b>	Required annually, in English	Not Required	
Less than <b>\$500,000</b>	Not required, <i>except during Initial Certification</i>	Not Required	
<p><b>NOTE:</b> If a foreign institution has a financial condition or financial reporting problem, the Secretary may require the foreign institution to submit audited financial statements in a manner specified by the Secretary.</p>			



# Foreign Graduate Medical School Requirements

- §600.55—USMLE Pass Rate Percentages
  - Effective July 1, 2010, 75% pass rate required (raised from 60%)
    - Exemption for schools with a State-approved clinical training program as of January 1, 1992 continues, if the school operates a clinical training program in at least one State that approves the program.
    - Exemption for Canadian Medical Schools



# Foreign Graduate Medical School Requirements

- §600.55(f)(1)(B)—Citizen Percentage
  - Foreign medical school exempt from 60% citizenship percentage if institution had State-approved clinical training program as of 1/1/2008 and continues to operate such a program in at least one State that approves the program
- §600.55(c)—MCAT Requirement



# Foreign Graduate Medical School Requirements

- USMLE Pass Rate Percentage (cont.)
  - School must have a pass rate of 75% on each test step, i.e., Step 1, Step 2-Clinical Skills and Step 2-Clinical Knowledge
  - Limited to Step 1, Step 2-CS, Step 2-CK
  - Requirement includes first time test takers



# Foreign Graduate Medical School Requirements

- USMLE Pass Rate Percentages (cont.)
  - Example of 2011 pass rate calculation

Those from the denominator who passed Step 1  
All students and graduates\* who took Step 1 for the first time during calendar year 2011

\*Graduate—a student who graduated from the school during the three years preceding the year for which the calculation is performed



# Foreign Graduate Medical School Requirements

- USMLE Pass Rate Percentages (cont.)
- Small number of USMLE test takers
  - Calculation would result in any step/test pass rate based on fewer than 8 students/graduates=single pass rate based on all steps/tests combined
  - Combining results on all step/tests would result in pass rate based on <8 step/tests results=no pass rate for that year; results for the year combined with each subsequent year until pass rate based on at least 8 step/tests results derived



# Foreign Graduate Medical School Requirements

- §600.55(c)—MCAT Requirement
  - A foreign graduate medical school with a post-baccalaureate/equivalent medical program must require students accepted for admission who are U.S. citizens, nationals, or permanent residents to have taken the MCAT and to have reported their scores to the school



# Foreign Graduate Medical School Requirements

- §600.55(d)—Date Collection & Submission
  - School must determine consent requirements and require all students accepted for admission to provide consent to enable school to collect & submit data



# Foreign Graduate Medical School Requirements

- Data Collection & Submission (cont.)
  - A school must obtain, at own expense, and submit by 4/30 each year:
    - All student and graduate scores on USMLE for each step/test and attempt for preceding calendar year together with dates student took each test, including failed tests
    - School must submit this data to ED unless school allows ECFMG to provide the information directly to ED
      - Medical schools exempt from 75% Pass Rate also report USMLE Pass Rates



# Foreign Graduate Medical School Requirements

- A school must obtain, at own expense, and submit by 4/30 each year:
  - Citizenship rate for preceding calendar year, unless statutorily exempt, to ED
  - MCAT scores of all US citizens, nationals & permanent residents admitted in preceding year, and number of times each took the test, to the accrediting authority and, on request, to ED



# Foreign Graduate Medical School Requirements

- A school must obtain, at own expense, and submit by 4/30 each year:
  - Percentage of students graduating in preceding calendar year (including at least all U.S. citizens, nationals & residents) who are placed in an accredited U.S. medical residency program, to the accrediting authority and, on request, to ED



# Foreign Graduate Medical School Requirements

- §600.55(g)(1)—Satisfactory Academic Progress
  - School must include as a quantitative component a maximum timeframe for student to complete program that is:
    - No longer than 150 percent of published length of program
    - Divided into increments, not to exceed lesser of one academic year or ½ published length of program



# Foreign Graduate Medical School Requirements

- School must include as a quantitative component of satisfactory academic progress a maximum timeframe for student to complete program that:
  - Include schedule established by school designating minimum percentage or work that student must complete at end of each increment to complete program with maximum timeframe
  - Include specific policies defining effect of course incompletes, withdrawals, repetitions, noncredit remedial courses on satisfactory progress



# Foreign Graduate Medical School Requirements

- §600.55(g)(2)—Remediation and Language of Instruction
  - School must document educational remediation provided to assist students in making satisfactory academic progress
  - School must publish all the languages in which instruction is offered



# Foreign Graduate Medical School Requirements

- §600.55(h)—Location of a Program
  - No portion of program offered to U.S. students, other than the clinical training portion, may be outside of the country in which the main campus of the foreign medical school is located.



# Foreign Graduate Medical School Requirements

- §600.55(h)—Location of a Program
  - All portions of program offered to U.S. students must be in a country whose medical school accrediting standards are comparable to U.S. standards as determined by the NCFMEA except for:
    - Clinical training sites located in the U.S.
    - Clinical training sites at locations that have U.S. medical accreditation/no more than 2 electives in 8 weeks criteria



# Foreign Graduate Medical School Requirements

- Location of a Program (cont.)
  - Clinical training portion of programs located in foreign country other than country where main campus located or in the U.S.—
    - Site must be located in an NCFMEA approved comparable foreign country
    - School's medical accrediting agency must have conducted on-site evaluation and approved the clinical training site



# Foreign Graduate Medical School Requirements

- Clinical training portion of programs located in foreign country other than country where main campus located or in the U.S. (cont)—
  - Clinical instruction must be offered in conjunction with programs offered to students enrolled in accredited medical schools located in that approved foreign country
- Clinical training at location that meets U.S. accredited/no more than 2 electives in 8 weeks criteria is exempt from requirements



# Foreign Graduate Medical School Requirements

- Location of a Program (cont.)
  - Clinical training program located in foreign country other than country of main campus or in U.S. not required to meet previous requirements if:
    - Location is LCME or AOA accredited; or
    - No individual student takes more than 2 electives at the location and the combined length of the electives does not exceed 8 weeks



# Foreign Graduate Medical School Requirements

- Location of a Program (cont.)
  - As part of its clinical training, school may not offer more than 2 electives consisting of no more than 8 weeks per student at a site located in foreign country other than home country of main campus or in the U.S., unless location is included in accreditation of medical program accredited by LCME or AOA



# Foreign Graduate Medical School Requirements

- §600.55(e)—Clinical Training Requirements
- Formal affiliation agreement with hospital/clinic at which all or portion of clinical training or required clinical rotations are provided; and
- Formal affiliation agreement or written arrangements with any hospital/clinic where all or portion of clinical rotations not required are provided, except locations not used regularly, but instead chosen by individual students who take no more than 2 electives at the location for no more than 8 weeks total



# Foreign Graduate Medical School Requirements

- Agreements must state how following factors will be addressed:
  - Maintenance of school's standards
  - Appointment of faculty to staff
  - Design of curriculum
  - Supervision of students
  - Evaluation of student performance
  - Provision of liability insurance



# Foreign Graduate Medical School Requirements

- School must notify its accrediting body within one year of material changes in—
  - Educational programs, including changes in clinical training programs; and
  - Overseeing bodies and in the formal affiliation agreements with hospitals and clinics



# Foreign Graduate Medical School Requirements

- §600.20(a)—Application and Notification Procedure Requirements
- Initial participation application/reapplication
  - List location of all school sites, except clinical training sites not regularly used but chosen by individual students taking no more than 2 electives at the site for no more than 8 weeks total



# Foreign Graduate Medical School Requirements

- Initial participation application/reapplication
  - Type of clinical training offered at each site listed
  - Whether school offers (1) only post-baccalaureate/equivalent programs; (2) other types of programs leading to employment as doctor of osteopathic medicine or doctor of medicine; (3) both
  - Copies of affiliation agreements with hospitals/clinics providing clinical training



# Foreign Graduate Medical School Requirements

- §600.21—Updating Application Information
  - School must apply to ED and await approval to add locations that offer all or portion of school's core clinical training or required clinical rotations except locations LCME or AOA accredited
  - School must notify ED within 10 days of adding location offering all or portion of clinical rotations not required, except LCME or AOA accredited, or not used regularly but chose by individual students taking no more than 2 electives at location for not more than 8 weeks total



# Foreign Nursing School Requirements

- §§600.52 & .57—Eligibility of Foreign Nursing Schools to Participate
  - Must be an associate degree, collegiate, or diploma school of nursing
  - Must require students to complete clinical training in U.S. hospital or nursing school
  - Must have agreement providing for students to receive degrees from both foreign nursing school and U.S. nursing school



# Foreign Nursing School Requirements

- Eligibility of Foreign Nursing Schools to Participate
  - Must reimburse ED for cost of loan defaults that occur the cohort default rate period
  - Cost of a loan default is the estimated future cost of collections



# Foreign Nursing School Requirements

- At least 75% of U.S. students and grads must pass the NCLEX-RN
- Foreign Nursing School must obtain and provide to ED either—
  - NCLEX-RN exam results for U.S. students and graduates or
  - NCSB reports showing percentage of U.S. students and grads who passed the NCLEX-RN in the preceding year



# Foreign Nursing School Requirements

- Effective dates of new requirements:
  - July 2012 for foreign nursing schools that were participating in the title IV, HEA programs on August 13, 2008
  - July 1, 2011 for all other foreign nursing schools



# Foreign Veterinary School Requirements

- §600.56—Eligibility to participate
  - Students at for-profit foreign vet school must complete clinical training in U.S.
  - Students at public or private non-profit vet school must complete clinical training
    - In U.S.
    - In home country
    - Outside U.S./home country if site accredited by AVMA or individual student takes no more than 2 electives at the location and the combined length of the electives do not exceed 8 weeks at site



# Foreign Veterinary School Requirements

- Effective July 1, 2015, a foreign veterinary school must be accredited or provisionally accredited by an organization acceptable to ED



# Contact Information

We appreciate your feedback and comments. We can be reached at:

Gail McLarnon

Phone: 202-219-7048

Email: [Gail.McLarnon@ed.gov](mailto:Gail.McLarnon@ed.gov)

Fax: 202-502-7874

Joe Smith

Phone: 202-377-4321

Email: [Joseph.Smith@ed.gov](mailto:Joseph.Smith@ed.gov)

Fax: 202-275-3486

# "GREEN" EVALUATIONS

Online evaluations are new this year!

Three easy ways to participate:

1. Onsite at the Cyber Café (Atlantic C, 1<sup>st</sup> level)
2. The link e-mailed by FSA Conferences Staff
3. Access FSA Conferences Web site at [www.fsaconferences.ed.gov](http://www.fsaconferences.ed.gov)

