

Consumer Information

What, Why, Where, How, Who, When?

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What is Consumer Information?

- As a matter of federal law and in order to offer Title IV federal student aid, colleges must disclose to the public and report to the U.S. Department of Education information about:
 - Institutional and Financial Assistance information
 - Drug and alcohol abuse prevention and programs
 - Student Athletics
 - Student Right-to-Know Act
 - Clery/Campus Security Act
 - FERPA
 - Safeguarding Customer Information
 - Fire Safety Reports and Student Housing
 - Misrepresentation
 - Loan Disclosures

Why is it important?

- Consumer Information and disclosure requirements remain in the Top Ten Program Review Findings

Top Ten Domestic School Program Review Findings by Number of Findings for Fiscal Year 2017		
Finding Code Description	Number of Findings	Percent
STUDENT STATUS - INACCURATE/UNTIMELY REPORTING	154	7.3%
CRIME AWARENESS REQUIREMENTS NOT MET	113	5.4%
RETURN TO TITLE IV (R2T4) CALCULATION ERRORS	98	4.7%
DRUG ABUSE PREVENTION PROGRAM REQUIREMENTS NOT MET	96	4.6%
STUDENT CREDIT BALANCE DEFICIENCIES	88	4.2%
CONSUMER INFORMATION REQUIREMENTS NOT MET	86	4.1%
VERIFICATION VIOLATIONS	82	3.9%
ENTRANCE/EXIT COUNSELING DEFICIENCIES	80	3.8%
INACCURATE RECORDKEEPING	72	3.4%
SATISFACTORY ACADEMIC PROGRESS POLICY NOT ADEQUATELY DEVELOPED/MONITORED	66	3.1%
Total Top Ten Deficiencies	935	44.6%
Total 2017 Deficiencies	2,097	100.0%

Civil Penalty

- In addition to limit, suspending, or terminating the participation of any school that fails to comply with the consumer information requirement, the Department may impose civil fines of up to \$27,500 for **each** violation.
 - Sec. 487 (c)(3)(B) of the HEA

Annual Notice to enrolled students

- Notice of availability of all the consumer information
- **Must list and briefly explain certain consumer information items and how to obtain it**
- Individual one-to-one direct mailing of publication via U.S. Postal Service
- Individual one-to-one email
- Individual one-to-one mailing via campus mail
- CANNOT be a general posting via an internet/intranet website

Disclosure Requirements

- **Student FA programs and eligibility**
- Student loan code of conduct & PLA's
- Educational Costs
- **Withdrawals and refunds**
- **Student/Parent privacy rights FERPA**
- **Program Accreditation and Licensures**
- **Academic programs**
- **Transfer Credit Policy**
- **Grad/Completion/transfer out/retention rates**
- Gainful Employment Programs
- **Written arrangements with other institutions**
- **Refunds of Institutional Charges**
- **Athletic program participation and financial support**
- Campus security and fire safety
- Emergency Response and evacuation
- Drug and alcohol abuse
- **Copyright infringement**
- **Special Services/facilities for individuals with disabilities**
- **Study Abroad Policies**
- Vaccinations
- Voter Registration
- Constitution and Citizenship Day

How do you ensure compliance?

- Establish a Consumer Information Committee
 - While compliance is required to participate in Title IV aid, this does NOT have to be an FA responsibility.
 - Multiple offices contribute information that does not come out of the FA Office
- Use tools such as FSA Assessments or NASFAA Self-Evaluation tool
- **Re-evaluate annually**
- Designate one employee or group of employees to be available to students

Where to find information?

- FSA Handbook Vol. 2, Chapter 6
- IFAP FSA Assessment on Consumer Information

Consumer Information

This assessment describes the requirements for the consumer information that a school must provide to students, the Department, and others.

Review the [Consumer Information Disclosures at a Glance](#) document that provides a summary of school disclosure requirements.

If you identify areas requiring a corrective action, we recommend that you complete an [Action Plan](#).

Activity Bar:

[Consumer Information Activity 1: Institutional and Financial Assistance Information for Students](#)

[Consumer Information Activity 2: Drug & Alcohol Prevention](#)

[Consumer Information Activity 3: Consumer Information for Student Athletes](#)

[Consumer Information Activity 4: Student Right-to-Know Act](#)

[Consumer Information Activity 5: Clergy/Campus Security Act](#)

[Consumer Information Activity 6: FERPA](#)

[Consumer Information Activity 7: Safeguarding Customer Information](#)

[Consumer Information Activity 8: Fire Safety Reports and Student Housing](#)

[Consumer Information Activity 9: Misrepresentation](#)

[Consumer Information Activity 10: Loan Disclosures](#)

CONSUMER INFORMATION DISCLOSURES AT-A-GLANCE

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These charts provide a summary of School Disclosure Requirements (Non Loan Related and Loan Related), Related Activities from the FSA Assessments are also linked in the first column, if applicable.

Topic-Related Activity	Recipient of the Requirement	Non Loan Related Disclosure Requirements	
		Required Information/Regulatory, Law Resource Links	Method of Disclosure
Notice of Availability of Institutional and Financial Aid Information Activity 1	All Participating Title IV Schools	34 CFR 668.41 (a)-(d) , 34 CFR 668.42 , 34 CFR 668.43 Each school must annually distribute to all enrolled students a notice of the availability of the information that is required to be made available to students under the Family Educational Rights and Privacy Act of 1974 (FERPA) and under Section 485(a)(1), Section 485(f), Section 485(g), Section 485(h) and Section 485(j). The notice must list and briefly describe the information and include a statement of the procedures required to obtain the information. For information listed in the notice that is disclosed on a school's website, the notice must include the exact electronic address and a statement that the school will provide a paper copy upon request.	Notice distributed to each enrolled student
Contact Information for Assistance in Obtaining	All Participating Title IV Schools	34 CFR 668.42 ; 34 CFR 668.44 Each school must make available to prospective and enrolled students information regarding how and where to contact individuals designated to assist enrolled or prospective students in obtaining the information.	Made available through appropriate publications, mailing, or electronic media
			Made available through appropriate publications, mailing, or electronic media

CONSUMER INFORMATION

Activity 1: Institutional and Financial Assistance Information for Students

This Activity covers the following topics:

- ❑ Method of Disclosure [668.41\(b\)\(c\)](#)
- ❑ Financial Assistance Information [668.42](#)
- ❑ Institutional Information [668.43](#)
- ❑ Availability of Employees for information dissemination purposes [668.44](#)
- ❑ Constitution and Citizenship Day [Federal Register 5/24/2005](#)

Review and record what office is responsible for reviewing and updating the information listed below. Also indicate where this information is located and when it was last updated.

Topic – Method of Disclosure [668.41\(b\)\(c\)](#)

Office Responsible:	
Area Information is located:	
Date Document was last updated:	
Date Policy and Procedure was last updated:	

Who should participate?

- Financial Aid
- Business Office/Fees and Deposits
- Admissions
- Advising
- Records
- Academic Compliance
- Safety and Security
- Information Technology
- Campus Life
- Career Services
- Campus Bookstore
- Library
- Marketing and Public Relations
- Institutional Research

Availability for employees for information Dissemination purposes

- A school must designate an employee or group of employees to be available on a FT basis to assist enrolled/perspective students in obtaining consumer information.
- Person(s) must be available upon reasonable notice throughout the normal administrative working hours of the school.
- This may be waived by the Department if school's total enrollment is too small. The school must request this waiver from the Department.

When to disclose and report?

- There is no one common date/timeline
- Some disclosures have specific dates like Oct. 1
- Some disclosures to certain populations prior to an event such as enrollment
- A number of HEA disclosure provisions require that institutions deliver information directly to individuals. Posting information on the institution's website is **NOT** sufficient.
- Separate reporting requirements to submit to the U.S. Department of Education or other agencies

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