

Information Required to Be Disclosed Under the Higher Education Act of 1965: Suggestions for Dissemination – A Supplemental Report



INFORMATION REQUIRED TO BE DISCLOSED UNDER THE HIGHER EDUCATION ACT OF 1965: SUGGESTIONS FOR DISSEMINATION – A SUPPLEMENTAL REPORT

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Introduction

In 2009, the National Postsecondary Education Cooperative (NPEC) issued a report, *Information Required to Be Disclosed Under the Higher Education Act of 1965: Suggestions for Dissemination* (2009 NPEC report), that provided suggestions on how postsecondary institutions could meet disclosure requirements under the Higher Education Act of 1965 (HEA), as amended by the Higher Education Opportunity Act (HEOA) of 2008 (National Postsecondary Education Cooperative 2009). Disclosure requirements are information that a postsecondary education institution is required to distribute or make available to another party, such as students or employees. The purpose of the 2009 NPEC report was to help colleges and universities successfully identify and meet their obligation to disclose information as required under HEA, as amended by the HEOA. It included suggestions to help institutions make the required disclosures more accessible and understandable to consumers and more comparable across institutions.

There are about 40 consumer information disclosures with which postsecondary institutions must comply under federal law (see appendix A for a list of required disclosures as of November 2009). The disclosures range from providing information on campus crime to ensuring that students have received and understand their borrowing rights. Some of the required information must be “made available to students,” while others must be “provided to students.”

Given the prominent role that the Internet plays in providing students and families with information about colleges and universities, the 2009 NPEC report provided suggestions on how best to organize and present disclosure requirements on an institution’s web site. Specifically, the report included the following five suggestions:

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.

This paper was commissioned by NPEC to determine if institutions were implementing the suggestions in its 2009 report. This paper identifies how institutions have implemented the NPEC’s 2009 report suggestions on presenting disclosure requirements. Additionally, this report identifies other resources and tools that could be used by institutions to present disclosure requirements in a consumer-friendly manner. Specifically, the report addresses the following questions:

1. To what extent did institutions develop a single web page to present HEA disclosure requirements?
2. To what extent did institutions develop web pages that used a common set of content titles and presented HEA disclosure information in a consumer-friendly manner?

3. In what ways did institutions collaborate on their campus to develop consumer information websites?

Findings

1. To what extent did institutions develop a single web page to present HEA disclosure requirements?

Each of the 40 institutions reviewed for this study had a single “portal” web page that includes many of the HEA disclosure requirements. However, there were inconsistencies in how each institution’s web page was labeled. Institutions did not use the same terms to label or title the web page, a similar finding from the 2009 NPEC report. Several institutions labeled the web page “Consumer Information.” Some web pages were titled “Student Consumer Information”; “Disclosure of Consumer Information”; “HEOA Student Consumer Information”; and “Student Right to Know Information.”

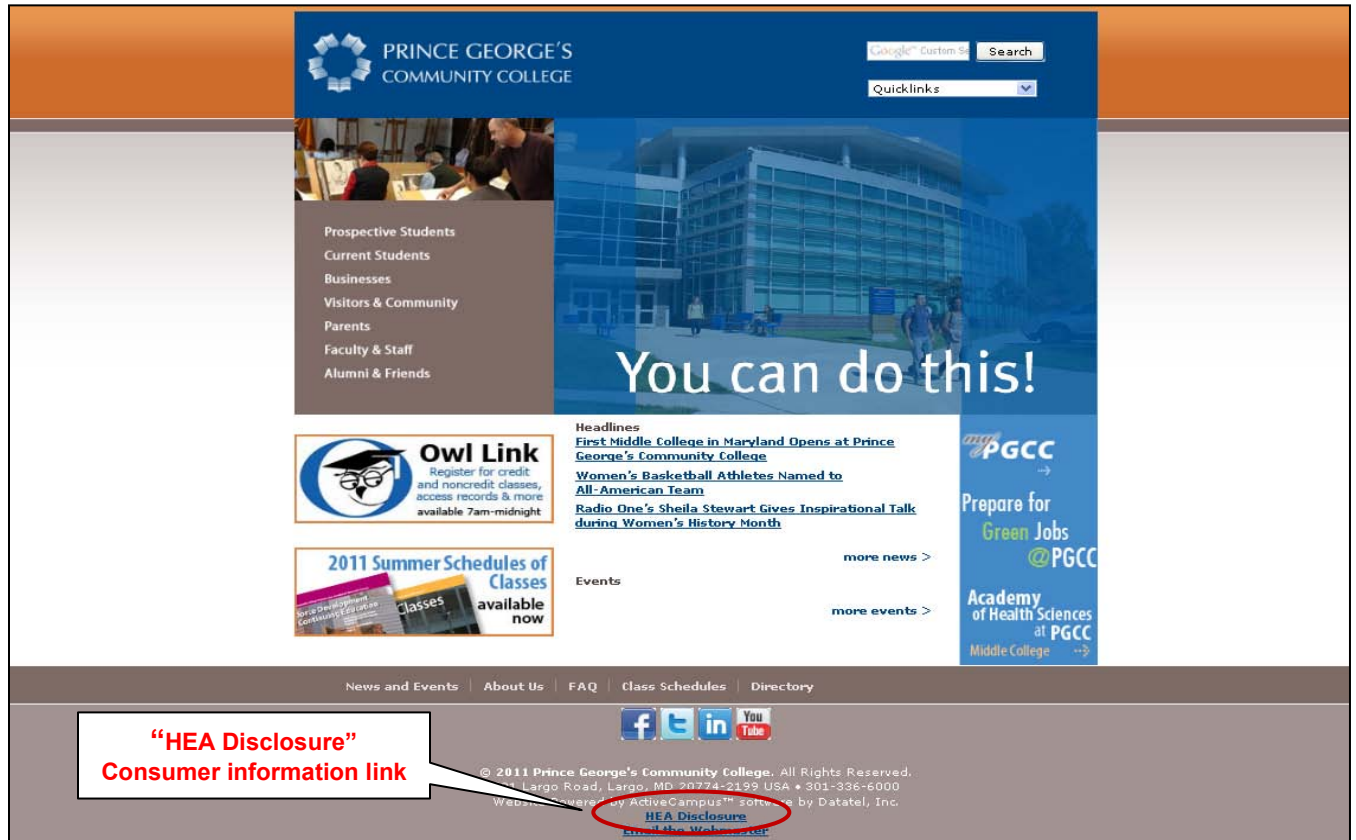
The University of Delaware developed another title for its web page—“Your Right to Know.” According to a university official, the university wanted to be sure that the link was accessible from the university’s home page and that the link would look appealing to a student. The institutional research office was leading the effort to design the University of Delaware’s web page and contacted the marketing and public relations office. Those offices created a logo and used the words “Your Right to Know” for the web page. The logo is located at the bottom of the University of Delaware’s main home page (www.udel.edu), as shown in exhibit 1.

Exhibit 1. University of Delaware’s website with “Your Right to Know” logo that links to consumer information

The screenshot displays the University of Delaware website layout. On the left is a blue navigation sidebar with sections: EXPLORE (About Us, UD Employment, Visit Us, Virtual Campus Tour), EXCEL (UDistinctions, Path to Prominence, A Diverse Campus), and MAKE A DIFFERENCE (Giving to UD, UD Serves the Community, Alumni Spotlight). The main content area features news highlights, a 'Subscribe to UDaily' button, and an 'IN THE SPOTLIGHT' section with articles on 'Yes U Can', 'UD Blogs', and 'Directions'. The footer contains various logos including 'Your right to know?' (circled in red), iTunes U, College Portrait, Delaware Health Sciences Alliance, Science & Technology Campus, and the University of Delaware logo. Contact information and copyright details are also present.

There were also inconsistencies in how easily consumer information web pages could be accessed or located. Among the 40 institutions reviewed, 14 had placed a link to their consumer information web page on the institution’s home page. Several institutions had the link at the bottom of the main home page in a small font. For example, Prince George’s Community College placed the link to its consumer information page at the bottom of its home page with the title of “HEA Disclosure,” shown in exhibit 2.

Exhibit 2. Prince George’s Community College home page with link to consumer information



Other institutions prominently displayed the link to the consumer information web page. As shown in exhibit 3, Brown Mackie College, a 2-year private for-profit institution, placed the words “Consumer Information” in a large font as well as a description of what that meant at the bottom of the college’s home page.

Exhibit 3. Brown Mackie College home page with link to consumer information

BROWN MACKIE COLLEGE™
Grow. Evolve. Become.

News & Events | Request Information | Student Log-In

Areas of Study | Find a School | Admissions | Military | Readmissions | Financial Aid | Why Brown Mackie College?

Let your creativity and imagination evolve into an exciting career.

ARE YOU A HIGH SCHOOL STUDENT? START HERE.

Get Started Today

Request Information
Chat Live Now
Have Us Call You

The next start date for all Brown Mackie College locations:
May 31st

27 LOCATIONS

1 COURSE A MONTH

Concentrate on one subject for one month, complete the course in 30 days, then move on to the next.

8 AREAS OF STUDY

- Business
- Early Childhood Education
- General Studies
- Healthcare and Wellness
- Legal Studies
- Nursing
- Technology Based
- Veterinary

Start building your future today!

NEWS & ANNOUNCEMENTS

- 5/12/2011 Brown Mackie College – Merrillville Announces 2011 Graduation Ceremony
- 5/9/2011 Brown Mackie College – Fort Wayne Announces 2011 Commencement Ceremony

STUDENT CONSUMER INFORMATION

Here you'll find the information you need to become an informed consumer as a student at one of our Brown Mackie College schools.

LEARN MORE >

Once a student clicks on the “Learn More” button, they are then asked to select a campus location and then directed to the consumer information web page for that campus.

BROWN MACKIE COLLEGE
MIAMI™

Student Consumer Information

- Overview
- Financial Aid Facts
- Academics
- Textbooks
- Student Services
- Career Services Stats
- Outside Resources
- Student Success
- Gainful Employment Data

Welcome to our student consumer information pages.

Here you'll find the information you need to become an informed consumer of a Brown Mackie College education.

From financial aid facts and forms and information from our Student Services and Career Services departments to academic information including course information, textbooks, and catalogs, it's all on these pages.

Explore our student consumer information pages, and if you are thinking about attending Brown Mackie College – Miami, go to [our school site](#) where you can learn even more about our school.

If you are a current student, you can log onto your [student portal](#).

Brown Mackie College
© 2011 Brown Mackie College

By placing a link to the consumer information web page directly on the institution’s home page, students can find the information in “three-clicks,” as suggested in the 2009 NPEC report. Other institutions placed a link to the consumer information web page under the “About Us” section or the “A-Z Index.” Thus, if a student knew to look for the words “consumer information” or “student consumer information,” they would be able to find the consumer information web page within three clicks. Two institutions, California State University-San Bernardino and National American University, placed a link to their consumer information page web on all of the main university web pages. Although a student could feasibly access the disclosure information from multiple sites on these two institutions’ web pages, the language used to identify the web page is “HEOA” or “disclosure of consumer information”—terms that may not be meaningful for a student.

Although most institutions reviewed implemented the three-click approach, others did not place links to the consumer information web page in an easily accessible or “shallow” location as suggested in the 2009 NPEC report. According to officials at two institutions, the consumer information web pages do not align with how their institution presents information to prospective or current students. The officials reported that they have created a web page that is compliant with the HEA disclosure requirements, but they did not necessarily want to draw attention to the page. These officials also raised concerns that students and parents would not actually use the information. One of these officials had conducted a web analysis of visitors to the consumer information web page and noted that all “hits” had come from internal campus offices.

2. To what extent did institutions develop web pages that used a common set of content titles and presented HEA disclosure information in a consumer-friendly manner?

Many of the web pages created by institutions were consumer-friendly and often used the common set of content titles suggested in the 2009 NPEC report. The consumer information web pages used a variety of formats to organize and present the HEA disclosure information. Some institutions had an overview page that included several categories that a consumer could select in order to find more information. For example, Black Hawk Technical College grouped disclosure information under the following five headings:¹

- College Life, includes health and campus safety information;
- Financial Aid, includes refund policy and counseling information;
- Academic Policies, transfer policies and graduation data;
- College Navigator Website; and
- Textbook Cost Information.

Although Black Hawk Technical College had organized consumer information in a visually appealing format, not all HEA disclosure information was located on this web page.

Ball State University also used a table of contents format for its web page and used the following seven categories for organizing disclosure requirements:²

¹ For more information, see <http://www.blackhawk.edu/StudentConsumerInformation.aspx>.

² For more information, see <http://cms.bsu.edu/about/administrativeoffices/assessment/officialstatistics/studentconsumer.aspx>.

- General Information, includes price of attendance, privacy policies, and transfer policies
- Teacher Preparation Program Report
- Student Financial Assistance/Availability/Contact Information
- Health and Safety
- Student Outcomes, includes retention and graduation rates
- Intercollegiate Athletic Program
- Voter Registration

According to the Ball State University official responsible for developing the consumer information web page, she used the 2009 NPEC report to create an outline for all the disclosures required and organized her web page based on the suggestions from the NPEC report.

All eight officials who were interviewed reported that the 2009 NPEC report was extremely helpful in organizing the information that needed to be presented. Other web pages reviewed also reflected the influence of the 2009 NPEC report. As shown in exhibit 4, Bloomsburg University also used the suggested titles and outline presented in the NPEC report to organize its student consumer information web page.

Exhibit 4. Partial view of Bloomsburg University’s consumer information web page

Bloomsburg University
OF PENNSYLVANIA

Search

About Us | Academics | Admissions | Alumni | Support BU | Athletics | News & Events | Student Life | A-Z Index

BU Home

Prospective Students
Current Students
Parents & Visitors
Faculty & Staff
Strategic Plan
PA Budget Impact
Today's News
Celebrity Artist Series
Make a Gift

HEA Student Consumer Information

General Institutional Information

- [Privacy of Student Records – Family Educational Rights and Privacy Act \(FERPA\)](#)
- [Facilities and Services for Students with Disabilities](#)
- [Student Diversity](#)
- [Price of Attendance](#)
- [Net Price Calculator](#)
- [Refund Policy and Requirements for Withdrawal and Return of Federal Financial Aid](#)
- [Textbook Information](#)
- [Educational Programs](#)
- [Instructional Facilities](#)
- [Faculty](#)
- [Transfer of Credit Policies and Articulation Agreements](#)
- [Copyright Infringement – Policies and Sanctions](#)
- [Computer Use and File Sharing](#)
- [Student Activities](#)
- [Career and Job Placement Services](#)

[Teacher Preparation Program Report](#)

Student Financial Assistance

- [Assistance Available from Federal, State, Local and Institutional Programs](#)
- [Federal Student Financial Aid Penalties for Drug Law Violations](#)
- [Student Loan Information](#)
- [Financial Aid Disbursement](#)

[Initial Loan Counseling for Student Borrowers](#)

Accreditations

- [Middle States Association of Colleges and Schools](#)
- [Association to Advance Collegiate Schools of Business \(AACSB\)](#)
- [American Speech-Language-Hearing Association \(ASHA\)](#)
- [National Council for Accreditation of Teacher Education \(NCATE\)](#)
- [Accreditation Board for Engineering and Technology \(ABET\)](#)
- [American Society of Exercise Physiologists \(ASEP\)](#)
- [National Association of Schools of Music \(NASM\)](#)
- [Commission on Collegiate Nursing Education \(CCNE\)](#)
- [Council on Social Work Education \(CSWE\)](#)
- [Commission on Accreditation of Allied Health \(ABET\)](#)
- [Allied Health Education Programs \(CAAHEP\)](#)
- [Council on Education of the Deaf \(CED\)](#)
- [National Association of Schools of Theatre \(NAST\)](#)
- [National Association of Schools of Art and Design \(NASAD\)](#)
- [Commission on Accreditation of Athletic Training Education \(CAATE\)](#)
- [Council on Accreditation of Nurse Anesthesia Educational Programs \(COA\)](#)
- [Computing Accreditation Commission \(ABET\)](#)
- [Technology Accreditation Commission \(ABET\)](#)

Students requesting a copy of an accreditation certificate click on the respective accreditation to print. If you do not have access to a printer, please contact the [Office of the Provost](#) at (570) 309-4308 to receive a copy.

Although all 40 institutions had created web pages with consumer-friendly language, several of the web pages did not include all the required disclosure information. In many cases, a disclosure requirement was listed, however the link to the information was not working, or there was no link to click on to access the information. According to some officials, they were still working on collecting information on their campus. At one university, during the process of developing the web page, they learned that the alumni office had not conducted its annual survey of graduates in 5 years. As a result, the university did not have job placement data on its web page. Another official stated that her office had not collected transfer-out data, and she had recently begun working with the National Student Clearinghouse so that her university could report a transfer-out rate.

Across the 40 consumer information web pages, there was a wide range of formats for presenting disclosure information related to price of attendance, job placement, graduation and transfer-out rates, and retention rates. Several institutions presented the data in a visually appealing and easily understood format by using tables, charts, and graphs. Exhibit 5 shows how Dickinson College created a simple table to present retention and graduation information on its consumer information web page.

Exhibit 5. Dickinson College consumer information web page disclosure of retention and graduation rates

The screenshot shows the Dickinson College website's navigation menu on the left and a main content area on the right. The navigation menu includes links for ABOUT DICKINSON, ACADEMICS, ADMISSIONS, STUDENT LIFE, ATHLETICS, NEWS AND EVENTS, a search bar, and links to Library & Information Services, Giving To Dickinson, Gateway Portal, Alumni, Parents, and Contact Us. The main content area features a breadcrumb trail: HOME > ABOUT DICKINSON > ADMINISTRATIVE OFFICES > INSTITUTIONAL RESEARCH > RETENTION. Below this is a grid of menu items: Consumer Information, Survey & Data Request, Links, Staff, Reports, Admissions Data, Enrollment, Retention (highlighted in red), Graduates, Faculty, Finances, and Peers. The main heading is "Retention" with a "Print Page" icon. The "Retention Rates" table shows data for the Entering Fall Cohort from 2005 to 2009, with a 1-Year Retention Rate ranging from 91% to 92%. The "Graduation Rates" table shows data for the Entering Fall Cohort from 2002 to 2006, with 4-Year, 5-Year, and 6-Year Graduation Rates ranging from 80% to 84%.

Retention Rates					
Entering Fall Cohort	2005	2006	2007	2008	2009
1-Year Retention Rate	91%	91%	92%	92%	90%

Graduation Rates					
Entering Fall Cohort	2002	2003	2004	2005	2006
4-Year Graduation Rate	80%	81%	80%	81%	81%
5-Year Graduation Rate	83%	84%	83%	83%	
6-Year Graduation Rate	84%	84%	83%		

Other institutions did not use such formats, making it challenging for a consumer to digest a large amount of information. Some institutions linked to the form they used to report data to the Integrated Postsecondary Education Data System (IPEDS) to show retention or graduation data.³

³ For more information, see http://www.redlandsc.edu/files/usermedia11/documents/IPEDS_Graduation_Rates.pdf.

Another institution showed job placement rate data by linking directly to a 37-page alumni survey report.⁴ The report included the responses for each question in the survey, and it was challenging to locate the actual job placement for graduates of the college. For student body diversity, graduation rates, and retention rates, several institutions linked to the College Navigator website, and then the consumer needed to search for the institution to find the information.

3. In what ways did institutions collaborate on their campus to develop consumer information web pages?

Across the eight institutions interviewed, there was extensive collaboration across campus offices in order to develop the consumer information web pages. One of the first steps was determining who was responsible for leading the development of the web page and ultimately monitoring its accuracy over time. For the most part, the institutional research office was in charge of developing and monitoring the web page. Institutional research staff were often the lead because they were the most aware of the requirements through their attendance at institutional research conferences and their responsibilities for IPEDS data reporting. However, at one institution the process was led by the public relations office, and at a for-profit institution it was led by a project manager from the communications department.

The primary responsibility of the lead staff person was to identify the required disclosures, the office responsible for the information, and a contact person. Several officials reported that they took a systematic approach to collecting the necessary information, creating spreadsheets with the disclosure requirements listed in the 2009 NPEC report and then adding information about the responsible campus office and whether there was already a web page that included the information. According to several officials, almost all of the information was available either on a campus web page or in the institution's fact book. If the information was not already available, the lead staff person would create a web page or a PDF document for the information. At one institution, an official reported creating PDF documents for most of the disclosure requirements, thus making the process more time consuming.

The consumer information web pages that were created encompassed information from an array of campus offices, such as Campus Safety, Student Services, Athletics, Public Relations, Academic Affairs, Alumni Services, Financial Aid, Webmaster, Facilities, and Registrar, among others. At each of the eight institutions, the officials who led the development of the consumer information web page reported that other campus offices were generally agreeable and readily provided the information that was needed to create the web page. At two institutions, the development of the web page occurred at the same time as an accreditation site visit, which heightened awareness of the disclosure requirements because the accreditors were asking for the same information. At another institution, the consumer information web page was developed during a university-wide web redesign, thus making the process more seamless.

According to campus officials, there were some disagreements that occurred between campus offices. Most of the disagreements involved interpreting the disclosure requirements and determining what information was exactly required to be disclosed. According to a few officials,

⁴ For more information, see <http://www.covenant.edu/pdf/IR/AlumniSurvey2006-2007.pdf>.

the disagreements often occurred with the financial aid and campus safety offices. Both of these campus offices had professional associations that were actively providing guidance and interpretations of HEA disclosure requirements. Sometimes the advice provided by professional associations conflicted with the information that was in the 2009 NPEC report, and the person responsible for developing the web page had to resolve those differences.

In addition to the on-campus collaboration, many institutions collaborated with other colleges and universities. Several reported that they had learned how other institutions were implementing the suggestions in the 2009 NPEC report at conferences and IPEDS training sessions. Sharing web page templates and organizational tools was common among colleges and universities. For example, one official often used other university and college web pages as a guide when creating his own consumer information web page. Despite the widespread dissemination of information about disclosure requirements, several officials reported that there are institutions that are still not aware of the 2009 NPEC report and suggestions for developing a single web page. Based on the Internet search conducted for this study, there are institutions that do not have a single consumer information web page for presenting HEA consumer information.

Conclusions

Almost 3 years after the HEA was amended by the HEOA, institutions are still working to meet the disclosure requirements included in the law. Many institutions from across all sectors have developed single consumer information web pages to present federal disclosure requirements that are easily accessible, use consumer-friendly terms, and use common titles to allow for comparisons across institutions. The guidance provided in the 2009 NPEC report has been instrumental in helping many institutions create a single consumer information web page to present federal disclosure requirements. Moreover, sharing of the report and information about disclosure requirements at conferences and trainings also provided institutions and their staff with resources they needed to create their consumer information web page.

Despite such progress, there is more work that needs to be done to present HEA disclosure information in a clear and consistent manner that can be compared across institutions. The 2009 NPEC report provided a summary of the disclosure information that should be included on institutions' consumer information web pages; however more guidance could be provided on how to organize the disclosure requirements and to present data in a visually appealing way. For example, many institutions' consumer information web pages simply list all the disclosure requirements rather than grouping them in similar categories. The web pages that utilized overview pages with a table of contents or with headings that grouped disclosure requirements were much simpler to navigate. In addition, institutions that used graphs or tables to present data on graduation or retention rates, job placement, or student diversity were easy to comprehend. Other institutions presented the raw data they submitted to IPEDS or all the data collected in a survey, making it difficult for a consumer to interpret the information. For disclosure requirements that include data, such as graduation rates, job placement, student body diversity, or retention rates, NCES could assist institutions by creating tables or graph templates that an institution could use in order to present data in a clearer manner. The templates could be based on those currently in use at some institutions.

References

National Postsecondary Education Cooperative. (2009). *Information Required to Be Disclosed Under the Higher Education Act of 1965: Suggestions for Dissemination (Updated)* (NPEC 2010-831v2), prepared by Carol Fuller and Carlo Salerno, Coffey Consulting. Washington, DC.

Appendix A: Suggested Titles for HEA Student Consumer Information on Institutional Web Portal Page

- Notice of Availability of Institutional and Financial Aid Information
- Contact Information for Assistance in Obtaining Institutional or Financial Aid Information
- General Institutional Information
 - Privacy of Student Records–Family Educational Rights and Privacy Act (FERPA)
 - Facilities and Services for Students with Disabilities
 - Student Diversity
 - Price of Attendance
 - Net Price Calculator
 - Refund Policy and Requirements for Withdrawal and Return of Federal Financial Aid
 - Textbook Information
 - Educational Programs
 - Instructional Facilities
 - Faculty
 - Transfer of Credit Policies and Articulation Agreements
 - Accreditation, Approval, and Licensure of Institution and Programs
 - Copyright Infringement–Policies and Sanctions
 - Computer Use and File Sharing
 - Student Activities
 - Career and Job Placement Services
- Teacher Preparation Program Report
- Student Financial Assistance
 - Assistance Available From Federal, State, Local, and Institutional Programs
 - Federal Student Financial Aid Penalties for Drug Law Violations
 - Student Loan Information
 - Initial Loan Counseling for Student Borrowers
 - Exit Counseling for Student Borrowers
 - Institutional Code of Conduct for Education Loans
 - Preferred Lender Lists
 - Preferred Lender Arrangements
- Health and Safety
 - Drug and Alcohol Abuse Prevention Program
 - Vaccination Policies
 - Campus Security Policies, Crime Statistics and Crime Log
 - Fire Safety Policies, Fire Statistics and Fire Log (On-Campus Housing Facilities)
- Student Outcomes
 - Retention Rate
 - Graduation Rates (Student Right-to-Know Act)
 - Transfer-out Rates (Student Right-to-Know Act)
 - Graduation Rates for Students Receiving Athletically Related Student Aid (Student Right-to-Know Act)

- Transfer-out Rates for Students Receiving Athletically Related Student Aid (Student Right-to-Know Act)
- Job Placement for Graduates
- Job Placement Rates for Graduates
- Graduate and Professional Education Placement for Graduates
- Intercollegiate Athletic Program Participation Rates and Financial Support Data (Equity in Athletics Disclosure Act)
- Voter Registration

This list was used in the 2009 NPEC Report, *Information Required to Be Disclosed Under the Higher Education Act of 1965: Suggestions for Dissemination*, which was prepared by Carol Fuller and Carlo Salerno of Coffey Consulting for the National Postsecondary Education Cooperative.

Appendix B: Methodology

Forty postsecondary institutions in five sectors were identified for this study using nonstatistical sampling. The number of institutions reviewed by sector is as follows:

- Eleven 4-year public institutions
- Ten 4-year private, not-for-profit institutions
- Four 4-year private, for-profit institutions
- Twelve 2-year public institutions
- Three 2-year private, for-profit institutions

The consultant identified institutions' consumer information web pages by using an Internet search engine and entering terms such as "consumer information, college"; "student information, university"; and "HEOA disclosure, college." It was challenging to identify 2-year for-profit institutions through these search terms, so the consultant used IPEDS data to identify institutions in this sector and went directly to their websites to locate their consumer information web pages.

To identify the extent to which institutions utilized suggestions included in the 2009 NPEC report, the consultant reviewed each institution's consumer information web page. During the review, the consultant noted whether suggestions from the 2009 NPEC report were implemented, the specific disclosure information that was included on the consumer information web page, and how students would be able to locate or access the web page.

To learn about the collaboration that occurred on campuses, the consultant interviewed officials at the following eight institutions:

- Chesapeake College (2-year public)
- Tufts University (4-year private, not-for-profit)
- University of Delaware (4-year public)
- Capella University (4-year private, for-profit)
- Xavier University (4-year private, not-for-profit)
- Dickinson College (4-year private, not-for-profit)
- Bloomsburg University (4-year public)
- Ball State University (4-year public)

During the interview, the consultant gathered information on each institution's process for developing the consumer information web page, including campus resources and staff involved; the roles and responsibilities of campus staff in developing and monitoring the web page; the extent to which the institution used suggestions outlined in the 2009 NPEC report; and any challenges encountered when developing the web page.