

**For-Profit Degree-Granting Institutions and Private
Vocational Schools in Washington:
Phase III Workgroup Report & Recommendations**

Prepared for the Washington Student Achievement Council
by the **William D. Ruckelshaus Center**

Final Report – December 14, 2018

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Introduction & Executive Summary

The Washington state Legislature (in its Fiscal Year 2018 Supplemental Budget) provided funds in House Bill 1439¹ to the Washington Student Achievement Council (WSAC), in collaboration with the state Workforce Training and Education Coordinating Board (Workforce Board) and state Department of Licensing, to resume its study of for-profit post-secondary degree-granting institutions and private vocational schools in Washington state.

The legislation authorized a second part to the study by The William D. Ruckelshaus Center (the Center), to facilitate discussions regarding the creation of an ombuds to serve students of institutions operating under the regulatory authority of these agencies (referred to collectively as career colleges and degree-granting institutions) in Washington.² The legislation also required the development of recommendations to strengthen the ability of regulating agencies to respond to, and protect student consumers from, sudden school closure. This included establishing a new Tuition Recovery Trust Fund (TRTF or Trust Fund) administered by WSAC, modeled on an existing Trust Fund administered by the Workforce Board. The existing Trust Fund serves students attending private vocational schools regulated by the Workforce Board; that is, those schools offering short-term, career-focused certificates below the degree level. The group also prioritized data standardization as a long-standing issue impacting this sector, and agreed to focus on this in the study and convening process.

From August to December 2018, the Center provided facilitation for three workgroups:

1. Tuition Recovery Trust Fund (TRTF) workgroup
2. Ombuds workgroup
3. Data Collection, Standardization, and Sharing workgroup

Each workgroup met between two and four times (a total of eleven workgroup meetings, including three by conference call) from August 2018 to December 2018, with the intent to develop and agree on recommendations and possible legislative and/or administrative rule changes related to each workgroup topic. After identifying research needed to inform their discussions, the Data workgroup agreed to commission Education Northwest (Ed NW), a subcontractor to the Center that had supplied research for the same parties in 2016-2107.

Participants in the workgroups included representatives from:

- Washington Student Achievement Council (WSAC)
- Workforce Training and Education Coordinating Board (Workforce Board)
- Department of Licensing (DOL)
- Northwest Career Colleges Federation (NWCCF)
- Department of Health (DOH)

¹ ESHB 1439 purpose: “Regulating the institutions of higher education, including for-profit institutions and private vocational schools, to protect students from unfair business practices”

² The agency participants elected to invite key staff from other pertinent state agencies with oversight roles of higher education institutions, including: Department of Health (Nursing Commission), Professional Educator Standards Board, and State Board for Community & Technical Colleges.

- Washington State Board for Community and Technical Colleges (SBCTC)
- Representatives of private vocational institutions
- Governor’s Office
- Legislative staff (observational/informational role only)

Overview of Workgroup Topics

The Tuition Recovery Trust Fund workgroup

The TRTF workgroup convened to create recommendations on “the use of trust funds and surety bonds for tuition recovery and other related losses.” Participants agreed the group should consider the ability of those security requirements to mitigate potential adverse impacts to students, whether from school closure events or other circumstances.

Discussion topics during facilitated meetings included the following:

- Potential contribution amounts and schedules for authorized institutions.
- The maximum fund amount.
- The use of surety bonds in relation to the TRTF.
- Non-school-closure events potentially suited for TRTF use.
- The scope of recovery currently permitted under the TRTF and surety bonds.
- Revising the terms of recovery permitted under the trust fund and surety bonds to include consistent terms.

Ombuds Workgroup

The Ombuds workgroup convened to create “recommendations regarding the creation of an ombuds to serve students of degree-granting institutions and private vocational schools, including a recommendation on which state agency should house the position, and if there are other ombuds positions created by the Legislature that can serve these students.”

Discussion topics during facilitated meetings included the following:

- Clarification of the duties of a potential ombuds.
- The duties and responsibilities of the participating agencies.
- New duties that could be assigned to an ombuds.
- Existing duties that could be shifted to an ombuds.
- Where the position should reside, if there is a recommendation to create the position.
- Agency response to hypothetical 2021 sudden school closure scenario if ombuds not created.

Data Workgroup Overview

The Data workgroup convened to continue work begun in 2016 and 2017 related to data collection, standardization, and sharing.

Discussion topics during facilitated meetings included the following:

- Data that state agencies should track (considering what federal and accrediting agencies collect).

- How to standardize data collection and metrics.
- Whether applied research would help the group reach practical conclusions.
- Authorities needed for each agency to collect and where appropriate, share needed data.
- Resources needed to create a single data entry portal for state agency data.
- Where the system should be housed and who should manage it.
- Research on data collected by accrediting agencies, compiled by Education Northwest.
- Possibility of including detailed program information and performance results (including employment rate and earnings of recent graduates), from ALL Washington postsecondary institutions on [CareerBridge.wa.gov](https://www.careerbridge.wa.gov).
- How to address schools with high percentages of self-employed graduates because of difficulties in determining employment outcomes through wage records.

Summary of Workgroup Findings and Recommendations

Tuition Recovery Trust Fund Workgroup

The TRTF workgroup recommends the Legislature amend certain sections of HB 1439 (now codified as RCW 28B.85.230) to:

- Allow the Washington Student Achievement Council (WSAC) to utilize the WSAC TRTF for non-school closure complaints (e.g. program closure, loss of accreditation, deceptive or unfair business practices, or failure to comply with requirements of Degree-Granting Institutions Act), which would provide greater student protections.
- Increase the length of time to achieve the minimum fund balance—which WSAC determined to be \$1 million—from 5 years to 10 years. This would decrease the burden on institutions paying into both the TRTF and surety bonds. Representatives of schools suggest lowering the minimum fund balance to \$500K if schools have just five years to fill it, and then reassessing this amount five years later. If the Legislature opts not to amend the sections, WSAC will develop a contribution schedule consistent with terms of the current law.

Ombuds Workgroup

The Ombuds workgroup put forth a two-phased recommendation. The initial phase, starting January 1, 2019, consists of taking a year to collect and analyze data from WSAC's new online student complaint portal. Agencies will examine the frequency and type of complaints, number of complaints per institution, and number of complaints per type of institution. The second phase will start in January of 2020 when agency staff will gauge the adequacy of existing state resources (agency oversight and response to student complaints, online complaint portal, and new student loan advocate position) and make recommendations on whether a new ombuds position is needed.

Data Collection, Standardization, and Sharing Workgroup

The Data workgroup findings and recommendations are based on the goal of providing a publicly-accessible and easy-to-navigate website, where prospective students can compare costs and outcomes across Washington postsecondary education and training programs. The workgroup recommends collecting standard student-level data across *all* higher education institutions, to help streamline reporting. The group recommends expanding [CareerBridge.wa.gov](https://www.careerbridge.wa.gov)—a website managed by the Workforce Board—to better resource that site to provide comprehensive performance evaluations of all Washington postsecondary programs across the education spectrum.

Recommendations in Detail

Tuition Recovery Trust Fund Workgroup (TRTF)

Findings and Recommendations

To provide stronger student protections, the TRTF workgroup recommends the following specifics to guide the enactment of the WSAC tuition recovery trust fund. The TRTF workgroup recommends the Legislature amend certain sections of HB 1439 (now codified as RCW 28B.85.230) so that the following changes take effect:

- WSAC should have the ability to utilize the TRTF to respond to valid student complaints unrelated to school closures. This would provide greater student protections. Key non-closure events that could result in student complaints include:
 - loss of accreditation for a school
 - loss of tuition or fees due to an unfair business practice—an institution’s failure to comply with the authorization requirements specified in the Degree-Granting Institutions Act, e.g. deceptive or misleading representations made by an institution or course or program cancellations that adversely affect students.³
- Since paying into both a surety bond and the TRTF could be burdensome on institutions, especially smaller schools, the length of time to achieve the minimum TRTF fund balance should increase from 5 years to 10 years. This change would alleviate the financial burden on (especially smaller) institutions paying into both the TRTF and surety bonds.⁴

If the Legislature acts on the recommendation to amend RCW 28B.85.230, WSAC can incorporate any amendments into the rulemaking process required to implement the TRTF. If the Legislature opts not to amend these sections, then WSAC will develop the contribution schedule consistent with the terms of the current law. This means the TRTF will need to be fully capitalized by June 2023 in an amount that is “sufficient to provide relief to students in the event of a school closure.” Based on the tuition and fee revenue of currently authorized institutions, WSAC has determined that amount to be \$1 million.

School representatives stated that capitalization of the TRTF on the terms of five years, at \$1 million would impose higher fees on institutions than some small schools can afford. The school representatives offered the following suggestions:

- Lower the amount to \$500K, or an amount less than \$1 million, and reassess after five years. They believe it is not necessary to reach \$1 million within five years. Instead, with surety bonds and the growing TRTF protections in place, the fund can grow to that amount within 10 years and sufficient coverage and protection would be in place during the fund development.

³ Currently, surety bonds are used as security for these types of circumstances (and, until capitalization of the TRTF, for losses related to school closures).

⁴ If the time for fully funding the TRTF remains at five years, schools requested—and WSAC indicated it would be appropriate—to gradually lower the required surety bond payment amount as the TRTF reaches solvency.

- If after five years, little to no additional funds are necessary, only new schools should be required to contribute to the fund (similar to the Workforce Board’s TRTF, which requires licensed schools to pay into the fund for 10 years; at five years, smaller institutions get a reduction in fees).
- The Legislature may consider authorizing WSAC to continue collecting contributions to the TRTF once the minimum fund amount has been attained, particularly if WSAC identifies and documents the need to do so.

Appendices:

- [WSAC contribution schedule](#);
- [Inter-agency MOU](#) and [Uniform School Closure Checklist](#)

Additional Consideration:

- The workgroup agreed that the TRTF should cover prepaid, unearned, non-Title-IV tuition and fees. Students may obtain relief for Title IV funds from loan discharge programs.
- A workgroup member representing institutions requested consideration of creating a “master” fee schedule where schools of the same type (e.g. Title IV schools of a certain size) would be treated the same across all three agencies (WSAC, Workforce Board, DOL) in the interest of simplicity and eliminating inconsistencies in the system.⁵ In response, WSAC noted that the collective tuition and fee revenue collected by cosmetology programs tends to be very different than the collective tuition and fee revenue of degree-granting institutions (although there may be outliers). Also, WSAC’s responsibility to implement the WSAC TRTF is separate from DOL’s responsibility to implement the DOL TRTF. The Legislature recognized the need to treat cosmetology programs, vocational programs, and degree-granting institutions differently when it created distinct statutes and regulatory structures for them (under DOL, WTB, and WSAC, respectively). If the Legislature feels there should be a single TRTF or that the contribution schedule for the TRTFs should be identical for certain classes or sizes of institution regardless of agency oversight, that could be specified in legislation.

Meeting Notes

TRTF meeting notes are included as [Appendix H](#)

⁵ Fee schedules from each agency are included as [Appendices D](#) and [D-1](#)

Ombuds Workgroup

Findings & Recommendations

State Services for Students of Career Colleges

To address the potential need for a state ombuds to serve students of for-profit higher education institutions and private vocational schools (career colleges), the workgroup identified a set of services (below) that the state should provide in service to students. These services include:

- Providing a central point of contact for students at the state level;
- Initial triage and routing to appropriate agency/agencies based on the nature of the complaint;
- Helping students navigate and understand the complaint process and providing a substantive response to complaints, where appropriate;
- Referring students and loan borrowers to the Student Loan Advocate (SLA) created by ESSB 6029, where appropriate; and
- Providing clear information and guidance for students in case of a school closure.

Except for a central point of contact (the first bullet above), these duties and services are currently handled by the participating state agencies; however, some suggest these services can be more clearly communicated to students (hence #2 below). The launch of a new student complaint portal (see below) will provide a central point of contact for students. Also, the workgroup notes that students must currently read and sign a document directing them whom to contact if they have a complaint.⁶

Improving Resources for & Responsiveness to Students

1. New Online Complaint Portal & Student Loan Advocate

The agencies are bringing online a new student complaint portal to provide a central point of contact and establish a consistent process for students to submit complaints. The portal will increase the resources available to students to guide them in navigating the complaint process and supply state agencies information about complaint type, status, and resolution. Also, the SLA will respond to complaints relating to student loans and loan servicers – a service the state has not previously provided.

2. Ensuring Student Awareness of Available Resources

State agencies need to develop consistent messaging to promote the student complaint portal and agency resources. In the event of school closures, agencies will address student needs based on clearly-articulated procedures for multiple agencies responding to sudden school closures (see [Appendix B](#)) that respond to the wide range of challenges students face in those circumstances. As noted above, agencies currently require institutions to provide students with information on where to file complaints, in multiple places: on enrollment agreements, course catalogs, and websites. In addition, agency rulemaking can add or enhance the following channels of outreach to help students know where to go:

- Include information about the online complaint portal with the periodic education loan notifications provided by institutions (required by SSB 5022.SL).
- Agency websites.
- Electronic communications from institutions to students.
- Electronic communications from state agencies.

⁶ For example, the Workforce Board requires schools to include a student complaint disclosure form within a student's enrollment agreement and post student complaint information within their course catalog. The agency also posts this information on its website.

3. Tracking Complaints, Response to Complaints, and Complaint Resolution

The workgroup noted the importance of tracking the status of complaints and collecting data about:

- The nature and volume of complaints (e.g. by sector, by authorizing agency, by institution type, and for each specific institution); and
- Timeline for complaint resolution.⁷

These data, summarized in an annual report with specific numbers, will allow the agencies to provide information to the Legislature (and other relevant parties) that might be used as the basis for additional rules, bills, or actions.

4. Potential New Ombuds Position

Overview

Related to a potential new all-purpose ombuds position, workgroup members all agreed that it makes sense to take a year after the two new state resources (SLA and student complaint portal) are implemented to evaluate how well student complaints are getting resolved, before recommending whether Legislature should create a new ombuds. The recommendation to wait and evaluate the effectiveness of new resources is rooted in uncertainty about the nature and volume of complaints awaiting the new SLA, as well as the need to collect data on complaints outside the scope of that position. This would allow any new position to have a clearly-targeted set of issues and responsibilities.

Duties for a Potential New Ombuds

In the event the data show a need for a future new for-profit higher education ombuds, or the Legislature wishes to create such a new ombuds position in its 2019 session, the workgroup articulated responsibilities that a potential ombuds would likely be expected to fulfill:

- Participating in agency meetings with students and agency school closure meetings: DOL/WSAC/Workforce Board quarterly Compliance Review Team (CRT) and any ad hoc interagency school closure response meetings;
- Participating in ongoing interagency conversations (e.g. CRT);
- Developing and maintaining resources for students affected by school closures, including articulation agreements among Washington state colleges and universities;
- Providing support to students affected by school closures with information responsive to the academic and financial impacts of such closures, including potential issues related to accepting federal loan disbursements;
- Helping students submit complaints and providing guidance with respect to the complaint resolution process; and
- Research and investigative work to stay current on rules, agency roles, policies (state and federal), and practices.

Additional Considerations

- Any potential ombuds should be responsive to the needs of career college students regulated by all state agencies, regardless of which entity or entities provide oversight.
- Any new ombuds should have access to student-level data as needed and appropriate, to assist students in achieving resolution of their complaints and issues.

⁷ The workgroup also discussed the idea of tracking student satisfaction with how the complaint process was administered (noting that student satisfaction with the *outcome* may not reflect whether the complaint resolution process was appropriately *administered*). The group chose not to recommend tracking this, since members were not sure whether such a survey could be administered or whether the results would be meaningful.

Recommended Approach (Option A)

All agencies will refer students to the new student complaint portal (coming online in late 2018). WSAC will collect data from information that students enter in the portal. The portal will route the complaint to the appropriate agency. The SLA will respond to complaints from borrowers relating to student loan servicers, consistent with the Student Loan Bill of Rights.

Beginning as soon as the online student complaint portal is up and running:

1. All participating agencies will work with schools to publicize the portal and refer students to it, in addition to maintaining staff resources to respond to complaints.
2. Agencies will engage in rulemaking to require disclosure of student complaint portal, SLA, and any future ombuds.
3. Participating agencies will collect info from portal on the:
 - a. Frequency and type of complaint;
 - b. Number of complaints per institution; and
 - c. Number of complaints per type of institution.
4. By January 1, 2020 agencies will plan to have an estimate of additional resources needed to make the portal more robust and whether an additional FTE to manage the portal will be needed.
 - a. By January 1, 2020, the participating agencies will assess the adequacy of the complaint portal and existing agency resources to respond to student complaints and meet student needs.
 - b. Once the assessment is complete, the participating agencies will recommend whether to create a new ombuds/navigator position. Note: the workgroup agreed that a prospective ombuds would need to function in a “guide” or “navigator” role, if housed in one of the state agencies in this workgroup. If the Legislature prefers the ombuds to operate in the case worker or advocate role, it would be most appropriate to house it in the Attorney General’s office or Governor’s office.

Option B

Create a new all-purpose ombuds position to fulfill any roles and duties from the first bulleted list that are not inconsistent with authority granted to the agencies. (WSAC would create a fiscal note, if directed by the Legislature.) Again, the workgroup recommends that any ombuds should be housed in the Governor’s Office or possibly the state Office of the Attorney General (though the latter could give students the idea that the ombuds may provide legal representation).

Additional Commitments from Agencies

- Continue referring students to institutions to resolve issues as first recourse.
- When responding to student complaints, agency staff should follow the following principles:
 - Use compassion;
 - Provide all information possible;
 - Refer student to all available and appropriate resources; and
 - Provide the highest and deepest customer support possible within the rule of law.
- WSAC and SBCTC continue tracking transferable Associate’s degrees.

Additional Considerations

- Provide latitude for the agency writing the fiscal note. The workgroup anticipated the possibility that additional FTE will be needed to strengthen the complaint portal to provide robust data tracking and potentially to respond to complaints but deferred to the discretion of the agency responsible for writing the fiscal note.
- Assess frequency, volume, and type of complaints to determine whether action is needed, and what the appropriate action is.

Ombuds Recommendation Continued: Hypothetical School Closure Scenario, e.g. in 2021, with Option A in place: See [Appendix J](#).

Meeting Notes

Ombuds meeting notes and materials are included as [Appendix I](#)

Data Collection, Standardization, and Sharing Workgroup

Introductory Statement

Several U.S. states (to better ensure public funds are well spent) are focused on increasing transparency and accountability, improving consumer choice, strengthening protections for students, and creating a level playing field among institutions. Washington can become a national leader if the Legislature enacts the recommendations below, which would put our state among the first to require all schools to make student-level data available to calculate student success in finding employment, entering the industry for which they trained, and how much they earned.

We are invested in student success. We believe that by evaluating data using the same metrics across all Washington education programs we will arrive at a true “report card” for the state’s entire post-secondary education system—from short-term certificates to four-year degrees, and beyond. This will put our state at the forefront of a national movement to better measure return on investment, as college costs rise and demand grows for education programs delivering meaningful, well-paying careers.

Findings & Recommendations

We recommend the Legislature require *all* Washington postsecondary institutions make available student-level data to enable state researchers to evaluate and make public the performance of the full spectrum of postsecondary education programs.

With these data available, the Workforce Board can independently verify the employment rates and earnings of recent graduates, student completion rates, key industries where they went to work after graduating, demographic characteristics of students enrolled in individual education programs, and other useful indicators.

Policy Goals:

- Help Washington residents make fully-informed education decisions.
- Provide an independent, third-party evaluation of Washington education programs that is verifiable, objective, and publicly accessible.
- Standardize and streamline data collection and reporting.
- Apply the same metrics across all postsecondary programs, helping students and their families make “apples-to-apples” comparisons on employment, earnings, and other outcomes.
- Help Washington businesses connect with a skilled workforce by enabling them to make the same “apples-to-apples” comparisons of Washington’s education and training programs.
- Encourage improved outcomes and performance at Washington’s postsecondary education institutions by regularly publishing program performance results as a “consumer report card” on [CareerBridge.wa.gov](https://www.careerbridge.wa.gov).

High-Level Recommendation

To fulfill the above goals, **the Legislature should require all institutions,⁸ except those that maintain a religious exemption from authorization, to make available student-level data to the Workforce Board**

⁸ “All institutions” per SB-6029: “as defined in RCW 28B.10.016, a degree-granting institution as defined in RCW 28B.85.010, a private vocational school as defined in RCW 28C.10.020, or school as defined in RCW 18.16.020.”

by the 2020 data reporting cycle. This will enable the agency's research staff to evaluate program performance across the full spectrum of Washington education programs and make performance results—including employment and earnings of recent graduates⁹—available via [CareerBridge.wa.gov](https://www.careerbridge.wa.gov).

Student-level data includes:

- Student Name
- Address
- Social Security Number
- Birth date
- Race
- Gender
- Disability
- Veteran status
- Prior education
- Program details (name, location)
- Program start date/exit date
- Award type (degree or certificate awarded)
- Student completion status

To meet policy goals, including streamlining data reporting across multiple agencies and education programs, **the workgroup recommends:**

- A data-sharing agreement (if needed) between the Workforce Board, DOL, WSAC.
- **The Legislature should enact legislation to require all institutions to make student-level data available to the Workforce Board, with “all institutions” defined in statute as “Any entity that is an institution of higher education as defined in RCW 28B.10.016, a degree-granting institution as defined in RCW 28B.85.010, a private vocational school as defined in RCW 28C.10.020, or school as defined in RCW 18.16.020.”¹⁰**
- **That existing authorizing or regulatory statutes be amended to include these additional reporting requirements and describe penalties for non-compliance.**

More Resources Needed (to evaluate greater amount of data for Career Bridge)

The Workforce Board currently collects, evaluates, and reports data on the agency's public-facing Career Bridge website (www.CareerBridge.wa.gov). The site is used every day by middle and high school students planning education and careers, jobseekers and job counselors at the state's WorkSource career centers, staff and customers of community-based organizations, and the general public. **The workgroup further recommends the Legislature provide the Workforce Board and partner agencies with additional resources to:**

⁹ Workforce Board research staff evaluate performance via student-level records (primarily linked to Social Security Numbers) using data matches with Unemployment Insurance wage records. Using annual records over a reporting period of July 1 – June 30, staff can evaluate:

- What percentage of students complete a program.
- What percentage of students were employed after completing a program (fourth quarter after exit).
- How much they earned. (This is averaged over the most recent three years, when data are available.)
- What industry they went work in (did they get a job in the field they trained for?).

¹⁰ NOTE: this would impact the State Board for Community & Technical Colleges, Independent Colleges of Washington (ICW), and Education Research & Data Center, which compiles data on students as they move through school to the workforce.

- **Conduct additional evaluations of reported data from a much larger mix of schools and colleges,**
- **Provide technical assistance to schools reporting data, and**
- **Ensure schools comply with the requirement to make their student data available.**
- **Perform necessary technical upgrades to the Career Bridge website**

Participating agencies will all need to devote more staff time to do this work and are beginning to gather information on the additional resources needed to evaluate and oversee collection of data from all Washington postsecondary institutions. Each agency will need to gauge the level of resources it will take to not only help ensure data gets collected, but to enforce penalties in cases where schools do not comply. More coordination will be needed among Workforce Board and other agencies to gather data and report it to the public each year.

Additional Considerations

The Eligible Training Provider List (ETPL)

Currently, Career Bridge features over 6,500 education programs across the education spectrum. However, the Workforce Board is authorized to require data only from the private career schools the agency licenses. Other data are collected on a “voluntary basis” as education programs are evaluated for inclusion on the state’s federally required Eligible Training Provider List (ETPL). Programs on this list have their performance results posted to Career Bridge. Programs that meet certain employment, earnings, and completion thresholds, potentially qualify for federal training dollars.

Data are provided to the Workforce Board for most community and technical college programs along with programs from the 300-plus private career schools licensed by the Workforce Board. Data are more intermittent for four-year institutions. These institutions report data only for programs they want evaluated for ETPL-eligibility and the linked federal training dollars. In addition, the Workforce Board also collects data from the Department of Labor and Industries for registered apprenticeships.

Appeals Process would be Maintained to Ensure Accuracy of Performance Data

The Workforce Board provides schools with their ETPL evaluation results, prior to posting performance to Career Bridge. Schools have a chance to appeal those results with additional student outcome data or amended student reports. Under this proposal to expand data collection to all Washington postsecondary programs, this same procedure will be used.

Benefits to Washington Students, Businesses and Schools:

- Independent data-matching ensures all education programs are evaluated consistently and fairly instead of relying on self-reported information from schools
- Prospective students and their families can make apples-to-apples comparisons across programs and institutions, and not just those that choose to be measure as part of the Career Bridge site.
- Schools can better market their programs using objective, verified information
- Schools will continue to potentially qualify their programs for federal and state training dollars by applying to the state’s ETPL.
- Businesses can more readily research the availability of a skilled workforce by looking at graduation rates, wage information, and employment outcomes of recent graduates.

Additional Considerations:

- Currently, most schools already collect and submit student-level data. This includes public universities and colleges, private career schools licensed and regulated by the Workforce Board, and

the state's community and technical colleges. The workgroup recognizes that some other schools may need to invest additional time and effort to provide these data.

- For some programs short-term outcomes are not sufficient to gauge long-term success. **The workgroup recommends the state add another metric that measures performance (employment and earnings) five years after a student graduates to allow additional time for students in longer-term programs to secure employment in their field.**

Concerns Specific to Cosmetology Schools:

The workgroup recognizes the cosmetology schools regulated under DOL (RCW 18.16) may face obstacles in complying with this recommendation for these reasons:

- *Students who attend these schools may or may not seek employment immediately after graduating.*
- *Students may become licensed and choose a different field other than what they went to school for.*
- *Students sometimes will work part time which could impact their wages.*
- *State unemployment data does not account for self-employed individuals: in the cosmetology sector, many graduates are small business owners, independent contractors, booth renters, etc. and these data do not appropriately account for them.*
- *Because it is cash, and gratuity/tip nature, the indicated income on Career Bridge (for the cosmetology sector) may be inaccurate due to underreporting. Underreporting is one reason for the large discrepancy between what is reported on Career Bridge and what salons and spas report as true earnings for these individuals. This discrepancy misrepresents the sector and its career earning possibilities.*
- *Administratively, it will be very burdensome for the smaller/micro schools. Larger school groups have the administrative capacity to submit this type of data (and respond/appeal when there are challenges with the data), but smaller schools struggle with these types of resources.*

To address this, some (not all) workgroup members suggested that cosmetology schools (regulated under DOL, per RCW 18.16) should be exempt from the requirement to report student-level data.

Additional Note on Student Debt

The workgroup also expressed interest in charting student debt. Currently, a federal website (College Scorecard) tracks the loan default rate on federal loans. Adding a link to this site might help students have a better understanding of the likelihood of going into debt. There are two bills that have passed the State Legislature (SB 5022 and SB 6029) that address loan indebtedness and could be used to help chart student debt.

Meeting Notes

Data meeting notes are included as [Appendix J](#)

Next Steps for Interagency Collaboration

While the specifics are to be determined by the agencies and may depend in part on this report, they are likely to continue along the following lines:

- Quarterly Compliance Review Team meetings,
- School closure response coordination using the approved checklist provided in [Appendix A](#),
- Commitment to sharing information related to student complaints, and
- Data standardization and sharing.

Appendix A – Sudden School Closure Procedures for Workforce Board

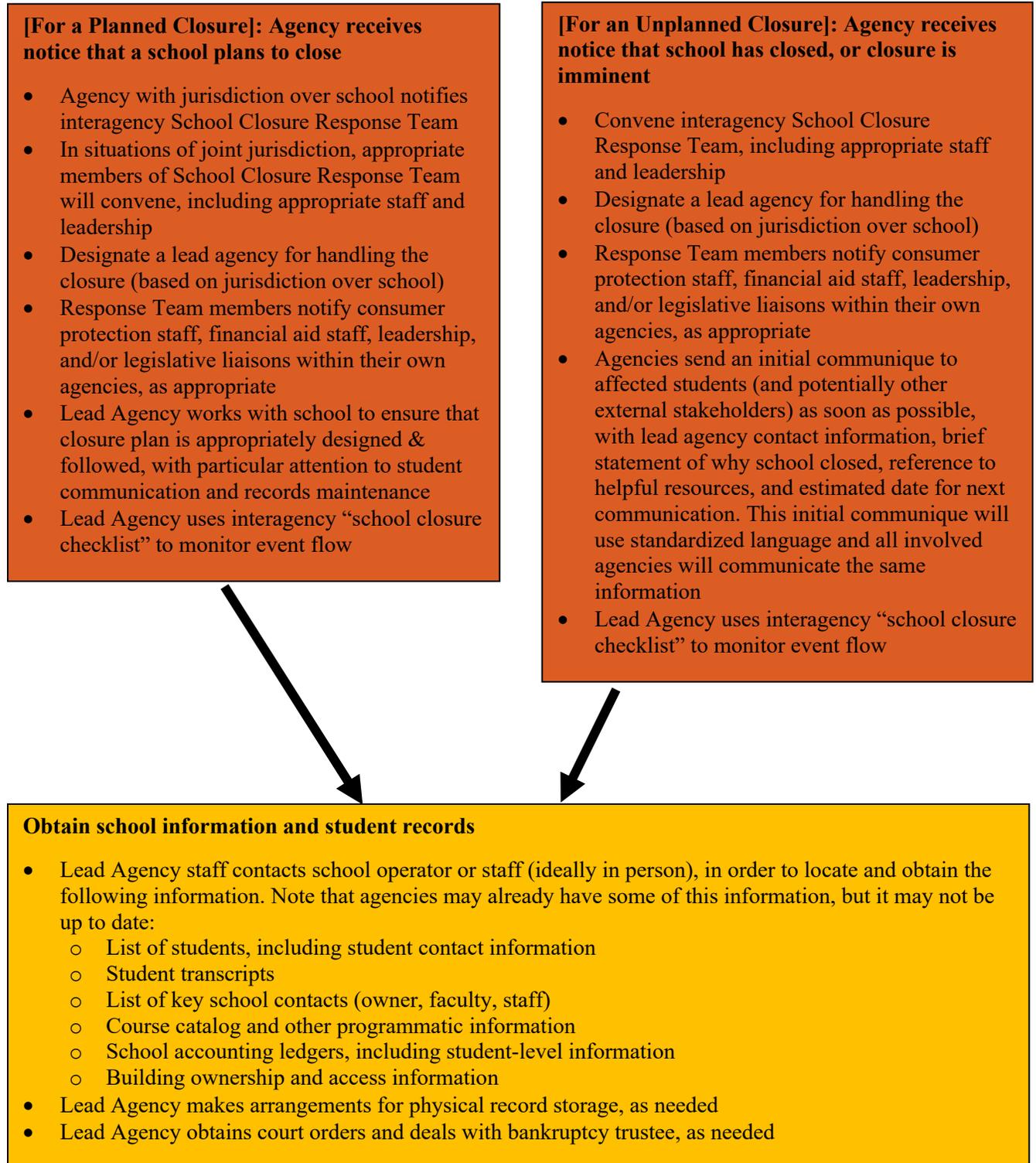
1. Notify Consumer Protection Team members, if the call comes into main line.
2. Unit Manager to determine if a Program Manager needs to go to the school.
 - a. Number of students affected
 - b. Type of programs
 - c. Risk to students
3. Unit Director and Program Specialist to create a customized School Closure Plan.
 - a. Determine who goes
 - b. Assign duties for staff
 - c. Are there security concerns?
 - i. Contact for local Sheriff's office or Washington State Patrol should there be a safety concern.
 - ii. Contact landlord-property owner, if needed
 - d. Logistics
 - i. For travel
 - ii. For records
4. Consumer Protection unit informs the Workforce Board Executive Director, the Communications Director for purposes of media coverage, and the Legislative Director. Schedule meeting if warranted. (If only a few students are affected, you may not need to gather this team.)
5. VA School? If yes alert VA staff. Staff will terminate school in system.
 - a. *Withdrawal date is the date Veteran's benefits end
6. If needed, schedule a meeting for affected students at the closing school.
 - a. Find a location for the meeting, possibly a local WorkSource center, or a hotel conference room.
7. Prepare and place flyers on the school's doors, may need to have a local contact place flyer for us (see "Closure Flyer Template".)
8. Check school website, if owner is cooperating, have the site taken down ASAP.
9. Protocol for inquiry calls. Media calls: go to Communications Director. Student calls: go to assigned Program Specialist.
10. Alert Workforce Board staff (especially reception) of the closure by giving them the following information:
 - a. Name and address of school and # students affected.
 - b. Workforce Board actions so far:
 - i. Flyers have been placed on school doors directing students to contact us.
 - ii. A student meeting is scheduled (give time, date, and place.)
11. If necessary, contact Assistant Attorney General at 360-586-0727.
12. If school is a Title IV (gets access to guaranteed student loans, Pell grants, etc.) contact Fed DOE 206-461-5325.
13. Call respective accrediting body, if there is one.

14. If school is a Commercial Truck Driving School, contact DOL CDL Administrator at 360-902-3893, DOL CDL Asst. Administrator at 360-902-3759, or DOL Compliance Manager at 360-902-3939.
15. If school is a massage school, contact DOH at 360-236-4945.
16. If school is a nursing assistant training school, contact NCQAC.Education@DOH.WA.GOV or 360-236-4745.
17. If the school is a long-term health care provider school, contact DSHS at 360-725-2549 (contact person as of December 2018: Christine Morris, DSHS/ALTSA/HCS; morrinc@dshs.wa.gov).
18. The attached "Joint Jurisdiction" document lists other, people to call, if needed.
19. Contact Northwest Career Colleges Federation, at 360-292-4798 to alert and see if teach-out coordination is feasible.
20. Contact regional WDC Director(s), not just the local WorkSource Centers. Listed by County at <http://www.wtb.wa.gov/LocalWorkforcePlans.asp>
21. Obtain financial, attendance, and grade records of currently enrolled students.
 - a. Find contact information for landlord to secure records
 - b. Search or call County Assessor sites
22. If needed, look for teach-out options with other local schools.
23. Obtain transcripts.
 - a. Is the school cooperating?
 - i. Ensure they have boxes, arrange to have boxes delivered. Have boxes delivered from Consolidated Mail Services or Washington State Archives, may need to ship from Office Depot if all other options fail.
 - ii. Have school weigh and measure boxes.
 - iii. Create a FedEx label with box size and weight, email to school administrator.
 - iv. Coordinate with Consolidated Mail Services for FedEx pick-up. Will need name of school, contact person, address, phone number, and when available to pick up (i.e. 1pm -5pm).
 - b. Will you need to seize the records?
 - i. Court Order, RCW 28C.10.160
 - ii. Other methods
 1. DOH may have copies of certificates
 2. Arrange for shipping if on site
24. Notify school about final Student Data report due in fall.
25. Create a Tuition Recovery Trust Fund spreadsheet; work with (Fiscal office) to determine Trust Fund-eligibility.
26. If needed, request Executive Director to grant additional use of the TRTF for teach-out options or to cover other fees.
27. Prepare letters for students who will not get refunds (see "No Refund Template".)
28. Prepare letters and worksheets for students who are eligible for refunds (see "Refund Template".)
29. Ensure all items on Closed School Checklist are completed.
30. Keep all TRTF records with closed school file (auditing purposes.)
31. Create a school dunning letter to cover TRTF payouts.
32. File in closed school file drawer.

33. File catalogs with other closed school catalogs.
34. Sort and alphabetize transcripts, hold until agency is ready to digitize.
35. After the last student is paid, schedule a debrief with all involved to improve process.

Appendix B – School Closure Interagency Flow

Interagency Event Flow for School Closure



Communication (Students & External Stakeholders)

- Lead Agency holds meetings with affected students, preferably at or near the school site, to provide additional information (including opportunities for tuition recovery and transfer/teach out). Meeting may also be attended by representatives from NWCCF, SBCTC, Dept. of Ed., or additional state-level agencies
- In addition to meetings, agencies send communications to students via multiple media pathways, including email, phone, “snail mail,” press releases, social media, and resources posted on agency websites.
- Each agency involved in the school closure designates a contact person to field all inquiries related to the closure
- All agencies will communicate consistent information throughout this process
- Lead Agency will keep legislators updated on the situation
- Wherever possible, agencies will work with school staff to effectively communicate with students

Make Arrangements for Teach Out and Transfer

- Coordinate with SBCTC and schools in region to identify teach out and transfer opportunities
- Ensure that students are aware of their options, especially the tradeoffs between loan forgiveness and credit transfer
- Implement tracking system [?]

Tuition Recovery

- Agency communications will inform students of opportunities for tuition recovery, including the deadline to file complaints
- Once complaint deadline is reached, agencies will process claims against the school’s bond or the TRTF

Appendix C – Voluntary Closed School Checklist

Closed School Checklist

School:

Location:

Program Manager:

Date Notified:

Closure Date:

School Contact Information

Owner or Administrator:

Address:

Phone:

Email:

- Is this a Sudden Closure Yes No. If Yes, refer to Sudden Closed School Procedures.
- Meet with school or Send "Closed School" (OOB) letter
- Change active code to 0 in Web database
- Enter closure date in Access database
- Inform Joint Jurisdiction and other workforce organizations, including WDCs, if needed.
- Communicate with CFO, Communication Staff, ETP staff and VA Staff
- Remove from website (send e-mail to Darlene)
- Relinquish license, if appropriate
- Inform the school that the Student Data Report will be due in fall, if training occurred, July 1 - June 30 the prior year.
- Transcripts (Possibly schedule a pick up)
Transferred to Workforce Board Date: _____
Retained by school
Contact Name: _____
Address: _____
Phone: _____
- Inform Homeland Security at sevpcompliance@dhs.gov, if school enrolls international students.
- TRTF Refunds paid out, if needed-final amount _____
- TRTF dunning letter sent, if needed
- File put in "Closed File" cabinet

Appendix D – TRTF Fee Schedules for WSAC, Workforce Board

WSAC TRTF Draft Schedule 2018-08-21 Revised

Institutions (names withheld)*	Tuition & fee revenue	New Trust Fund Payment .05% on first 1M; .1% beyond 1M; \$500 min.	Bond Payment (tuition x .001)	Total School Contribution (Bond + Trust Fund-- 10 years)	Contributions based on 5 yr, \$1 M TRTF (see columns H and I)	Total School Contribution (Bond + Trust Fund--5 years)	Tuition/fee revenue	contribution amount
	22,050	500	\$22.05	\$522.05	500	\$522.05	0-100K	500
	26,926	500	\$26.93	\$526.93	500	\$526.93	100K-250K	1,000
	34,770	500	\$34.77	\$534.77	500	\$534.77	250K-500K	1,500
	39,200	500	\$39.20	\$539.20	500	\$539.20	500K-750K	2,000
	52,405	500	\$52.41	\$552.41	500	\$552.41	750K-1M	2,500
	81,547	500	\$81.55	\$581.55	500	\$581.55	1M-1.5M	3,500
	82,249	500	\$82.25	\$582.25	500	\$582.25	1.5M-2M	4,000
	99,345	500	\$99.35	\$599.35	500	\$599.35	2M-2.5M	4,500
	100,094	500	\$100.09	\$600.09	1,000	\$1,100.09	2.5M-3M	5,000
	117,833	500	\$117.83	\$617.83	1,000	\$1,117.83	3-4M	6,000
	124,500	500	\$124.50	\$624.50	1,000	\$1,124.50	4-5M	7,000
	174,918	500	\$174.92	\$674.92	1,000	\$1,174.92	5-6M	8,000
	196,344	500	\$196.34	\$696.34	1,000	\$1,196.34	6-7M	9,000
	197,469	500	\$197.47	\$697.47	1,000	\$1,197.47	7-8M	10,000
	199,026	500	\$199.03	\$699.03	1,000	\$1,199.03	8-9M	11,000
	211,703	500	\$211.70	\$711.70	1,000	\$1,211.70	9-10M	12,000
	236,718	500	\$236.72	\$736.72	1,000	\$1,236.72	over 10M	\$ 14,000
	277,965	500	\$277.97	\$777.97	1,500	\$1,777.97		
	296,700	500	\$296.70	\$796.70	1,500	\$1,796.70		
	304,220	500	\$304.22	\$804.22	1,500	\$1,804.22		
	305,330	500	\$305.33	\$805.33	1,500	\$1,805.33		
	432,150	500	\$432.15	\$932.15	1,500	\$1,932.15		
	495,050	500	\$495.05	\$995.05	1,500	\$1,995.05		
	534,019	500	\$534.02	\$1,034.02	2,000	\$2,534.02		
	551,050	500	\$551.05	\$1,051.05	2,000	\$2,551.05		

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Institutions Names Withheld	Tuition & fee revenue	New Trust Fund Payment .05% on first 1M; .1% beyond 1M; \$500 min.	Bond Payment (tuition x .001)	Total School Contribution (Bond + Trust Fund-- 10 years)	Contributions based on 5 yr, \$1 M TRTF (see columns H and I)	Total School Contribution (Bond + Trust Fund--5 years)
	753,446	500	\$753.45	\$1,253.45	2,500	\$3,253.45
	881,125	500	\$881.13	\$1,381.13	2,500	\$3,381.13
	1,062,084	562	\$1,062.08	\$1,624.08	3,500	\$4,562.08
	1,348,552	848	\$1,348.55	\$2,196.55	3,500	\$4,848.55
	1,573,142	1,073	\$1,573.14	\$2,646.14	4,000	\$5,573.14
	1,647,805	1,147	\$1,647.81	\$2,794.81	4,000	\$5,647.81
	1,794,366	1,294	\$1,794.37	\$3,088.37	4,000	\$5,794.37
	1,813,597	1,313	\$1,813.60	\$3,126.60	4,000	\$5,813.60
	1,950,365	1,450	\$1,950.37	\$3,400.37	4,000	\$5,950.37
	2,000,363	1,500	\$2,000.36	\$3,500.36	4,500	\$6,500.36
	2,690,825	2,190	\$2,690.83	\$4,880.83	5,000	\$7,690.83
	3,030,000	2,530	\$3,030.00	\$5,560.00	6,000	\$9,030.00
	3,086,557	2,586	\$3,086.56	\$5,672.56	6,000	\$9,086.56
	3,325,853	2,825	\$3,325.85	\$6,150.85	6,000	\$9,325.85
	4,273,091	3,773	\$4,273.09	\$8,046.09	7,000	\$11,273.09
	4,966,537	4,466	\$4,966.54	\$9,432.54	7,000	\$11,966.54
	5,830,698	5,330	\$5,830.70	\$11,160.70	8,000	\$13,830.70
	7,162,800	6,662	\$7,162.80	\$13,824.80	10,000	\$17,162.80
	7,225,352	6,725	\$7,225.35	\$13,950.35	10,000	\$17,225.35
	7,809,309	7,309	\$7,809.31	\$15,118.31	10,000	\$17,809.31
	10,166,136	9,666	\$10,166.14	\$19,832.14	14,000	\$24,166.14
	10,322,131	9,822	\$10,322.13	\$20,144.13	14,000	\$24,322.13
	11,461,473	10,961	\$11,461.47	\$22,422.47	14,000	\$25,461.47
	24,403,831	23,903	\$24,403.83	\$48,306.83	14,000	\$38,403.83
		\$			\$	
Totals	125,773,019	121,435.00	\$125,773.02	\$247,208.02	193,500.00	\$319,273.02

* data does not include 8 new institutions that do not yet have reportable tuition/fee information

Workforce Board Fee Schedule, Including TRTF

FEE SCHEDULE

28C.10.070 RCW, 28C.10.084 RCW
WAC 490-105-070

Annual License Fee

If the school's total annual tuition revenue is:	Its Annual License Fee is:
\$0 - \$25,000	\$250
\$25,001 - \$50,000	\$500
\$50,001 - \$100,000	\$600
\$100,001 - \$250,000	\$750
\$250,001 - \$500,000	\$1,000
\$500,001 - \$1,000,000	\$1,500
\$1,000,001 - \$2,500,000	\$2,000
\$2,500,001+	\$2,500

Tuition Recovery Trust Fund Contributions

If the school's total annual tuition revenue is:	The school must make an initial deposit to the fund of:	The school will be billed the following amount semi-annually for the first five years it is licensed:	The school will be billed the following amount semi-annually for the second five years it is licensed:
\$0 - \$50,000	\$305	\$122	\$61
\$50,001 - \$75,000	\$457	\$183	\$92
\$75,001 - \$100,000	\$609	\$244	\$122
\$100,001 - \$150,000	\$914	\$366	\$183
\$150,001 - \$200,000	\$1,219	\$487	\$487
\$200,001 - \$250,000	\$1,523	\$609	\$609
\$250,001 - \$350,000	\$2,133	\$853	\$853
\$350,001 - \$500,000	\$3,046	\$1,219	\$1,219
\$500,001 - \$750,000	\$4,570	\$1,828	\$1,828
\$750,001 - \$1,000,000	\$6,093	\$2,437	\$2,437
\$1,000,001 - \$1,250,000	\$7,616	\$3,046	\$3,046
\$1,250,001 - \$1,500,000	\$9,139	\$3,656	\$3,656
\$1,500,001 - \$1,750,000	\$10,663	\$4,265	\$4,265
\$1,750,001 - \$2,000,000	\$12,186	\$4,874	\$4,874
\$2,000,001 - \$2,250,000	\$13,710	\$5,483	\$5,483
\$2,250,001 - \$2,500,000	\$15,233	\$6,092	\$6,092
\$2,500,001+	\$16,757	\$6,702	\$6,702

Payments should be made payable to "Washington State Treasurer"

Appendix D1 – Concise DOL TRFT



STATE OF WASHINGTON
DEPARTMENT OF LICENSING
PO Box 9020, Olympia, Washington 9850-9020

Washington Administrative Code Notice of Permanent Rules for Cosmetology, Hair Design, Barber, Esthetics and Manicuring

Adoption of: WAC 308-20-580 Tuition recovery trust fund

Effective date: These rule changes will become effective 31 days after filing on November 22, 2018.

What are the agency's reasons for adopting this rule?

Engrossed Second Substitute House Bill 1439 was passed during the 2018 legislative session requiring the Department of Licensing to establish rules.

Summary of all public comments received on this rule proposal and the agency's response to those comments:

Charlet Herrick wrote in support of the proposed rules.

Tina Evans wrote in support of the proposed rules.

Marilyn Firlotte wrote neither in support nor against the proposed rules and proposed the following:

1. Schools should not be licensed unless they can produce a viable business plan.
2. They must prove they have adequate financing before opening their doors.
3. They must show they have understanding of how to run a business.
4. They should not collect funds for the entire course at the beginning of the students' enrollment, but collect money as students are educated.
5. This should be the jurisdiction of the State Board of Cosmetology, hopefully with a citizen advisory board to help them, and oversight from the Legislature, and division of Vocational, Technical Education.

Frank Trieu, Evergreen Beauty Colleges, voiced support of the proposed rules with the following condition:

6. The Department should revisit the fund balance in two years to determine if the amount is sufficient.

Denise Montgomery, Washington Laser Institute, voiced support of the proposed rules with the following condition:

7. The Department should revisit the fund balance in two to three years to monitor the amount to ensure it does not become too high and to be notified if interest will be accrued into the trust account.

Agency's Response:

1. The Department of Licensing does not have the authority under current RCW and WAC to require schools to produce business plans.
2. The Department of Licensing does not have the authority under current RCW and WAC to require adequate financing.
3. The newly amended initial school licensure requirements under WAC 308-20-571 states: "School directors/administrators must have at least two years of experience working in a school or in the business administration field."
4. Collection of funds (tuition) is not currently regulated by the Department of Licensing.
5. Schools are regulated by the Department of Licensing with advice from the Cosmetology Advisory Board that is comprised of nine industry members and one public member.
6. The Department will review the fund balance in January of 2021.
7. The Department will notify schools if interest will be accrued into the trust fund.

Changes made to the proposed WAC as a result of public comment:

There are no differences between the text of the proposed rules as published in the Washington State Register and the text of the rule as adopted.

The Administrative Procedure Act (RCW 34.05.325(6)) requires agencies to complete a concise explanatory statement before filing adopted rules with the Office of the Code Reviser. This statement must be provided to anyone who gave comment about the proposed rulemaking.

The Department of Licensing appreciates your involvement in this rulemaking process. If you have any questions, please contact Damon Monroe, Agency Rules Coordinator, at (360) 902-3843 or email dmonroe@dol.wa.gov.

Appendix E – Student Disclosure: How to File a Complaint

Attachment B

[School Logo]
[Name of School]
[Address]
[Address]

HOW TO FILE A COMPLAINT

Washington law requires private vocational schools to inform students how to file a complaint. By signing this form you acknowledge this process has been explained to you. Below are the next steps the school must take in discussing this policy with you, along with information about the complaint process.

DISCUSSION ABOUT COMPLAINT POLICY REQUIRED

First, a school representative must discuss the school’s complaint policy with you. Following this discussion, you will be provided with this attachment to sign. After you sign this form, the school will give you a copy for your personal records. The school will also keep a copy on file.

ACKNOWLEDGMENT OF COMPLAINT PROCESS BY STUDENT

1. The school has described the grievance and/or complaint policy to me.
2. I understand that the policy can also be found in the school catalog.
3. I know I should first try to resolve a complaint or concern with my instructor or school administrator.
4. I understand nothing prevents me from contacting the Workforce Board at 360-709-4600 at any time with a concern or complaint, and complaint forms are: http://wtb.wa.gov/PCS_Complaints.asp.
5. I understand that I have one year to file a complaint from my last date of attendance.
6. I further understand that in the event of a school closure, I have 60 days to file a complaint.
7. I also understand that complaints are public records.
8. Finally, I acknowledge that details about the complaint process, my rights, and any restrictions on the time I have to file a complaint can be found at http://wtb.wa.gov/PCS_Complaints.asp

Name: _____ Signature: _____

Date: _____, 20__

ACKNOWLEDGMENT BY SCHOOL

Prior to being enrolled in this school, the applicant, whose name and signature appear above, has been made aware of the school’s complaint policy.

Name: _____ Signature: _____

Title: _____

Date: _____, 20__

Appendix F – Notice of Financial Obligation

Attachment A

[School Logo]
[Name of School]
[Address]
[Address]

NOTICE OF FINANCIAL OBLIGATION

Washington law requires the following information to be supplied to each student enrolling in a private vocational school licensed under Chapter 28C.10 RCW. One copy of this notice bearing original signatures must be attached by the school as addenda to that individual’s enrollment agreement, as well as a copy provided to the enrollee by the school.

ACKNOWLEDGMENT BY ENROLLEE

1. I understand and accept that any contract for training I enter into with the above named school contains legally binding obligations and responsibilities.
2. I understand and accept that repayment obligations will be placed upon me by any loans or other financing arrangements I enter into as a means to pay for my training.
3. I understand that any enrollment contract I enter into will not be binding or take effect for at least five days, excluding Sundays and holidays, following the last date such a contract is signed by the school and me, provided that I have not entered classes.

Name: _____

Signature: _____

Dated this: _____ day of _____, 20____

ACKNOWLEDGMENT BY SCHOOL

Prior to being enrolled in this school, the applicant whose name and signature appears above has been made aware of the legal obligations he/she takes on by entering into a contract for training. Those discussions included cautions by the school about acquiring an excessive debt burden that might become difficult to repay given employment opportunities and average starting salaries in his/her chosen occupation.

Name: _____

Title: _____

Signature: _____

Dated this: _____ day of _____, 20____

Appendix G – Complaint Disclosure Requirements

WAC 490-105-042

(9) The school's grievance procedure. The policy must be preceded by "Nothing in this policy prevents the student from contacting the Workforce Board (the state licensing agency) at 360-709-4600 at any time with a concern or a complaint, workforce@wtb.wa.gov";

(18) The following statement must appear prominently on either the first or last printed page or inside the front or back cover: "This school is licensed under chapter [28C.10](#) RCW. Inquiries, concerns, or complaints regarding this school can be made to the Workforce Board, 128 10th Avenue S.W., Olympia, Washington, 98501, [360-709-4600](tel:360-709-4600), web: www.wtb.wa.gov, email: workforce@wtb.wa.gov";

WAC 490-105-043

(2) The following statement: This school is licensed under chapter [28C.10](#) RCW. Inquiries, concerns, or complaints regarding this school can be made to the Workforce Board, 128 10th Avenue S.W., Olympia, Washington, 98501, [360-709-4600](tel:360-709-4600), web: www.wtb.wa.gov, email: workforce@wtb.wa.gov.

Appendix H - Draft Tuition Recovery Trust Fund Workgroup Meeting Notes

Tuition Recovery Trust Fund Workgroup Meeting August 16, 2018, 9:30am-12pm, WSAC Office

Attendees:

Maryann Brathwaite: Northwest Career Colleges Federation (Executive Director)
Sam Loftin: Washington Student Achievement Council
Debbie O'Neill: Washington Student Achievement Council
Tivoli Sharp: Washington Student Achievement Council
David Shulman: Seattle Film Institute (Proprietor)
Maddy Thompson: Senior Policy Advisor, K-12, Governor's Office

Observational/Informational Role Only:

Sarah Clifthorne: WA Senate Democratic Caucus, Policy Coordinator (Nonpartisan observer)
Trudes Tango: Counsel, WA House Office of Program Research, Higher Education Committee & Labor and Workplace Standards Committee (Nonpartisan observer)

Facilitation Team:

Chris Page, Maggie Counihan – The Ruckelshaus Center

Background:

- Previous study authorized by Legislature in 2016, interviews informed report to Legislature and interagency collaborative work since.
- In 2017, held a series of workgroup meetings to look at ways primary agencies could coordinate response to school closures, a potential ombuds position, and making data metrics more consistent and data reporting simpler.
- Current work will be focusing on finalizing ombuds recommendations and establishing a tuition recovery trust fund for student protections.

Tuition Recovery Trust Fund Updates:

- Broader topic regarding possible changing policies at the federal level
 - Potential repeal of gainful employment rule, may have repercussions and there may be related things in the upcoming legislative session
- Workforce Board (WTB) has a fund and Department of Licensing (DOL) is working on creating one based off the WTB fund.
- DOL has a different funding matrix and is set up for new schools to make an initial deposit

Surety Bonds:

- General discussion about surety bonds
 - Don't want agencies assessing each institution (double billing)
 - No institution is under all three agencies simultaneously
- The Arizona model looked at last year provides a potential model
 - The surety bond can replenish the fund, because it's easier to access than bonds.

- A fund may give the ability to obtain student records, which bonds cannot be used for
- If the agency only wanted to have a TRTF there would have to be a change in the law. Currently, it says that there has to be a surety bond as well as a trust fund.
- At DOL meeting there was concern about dual payments.

Discussion about TRTF:

- Wording in 1439 bill says that agencies have five years to provide full fiscal support to the tuition recovery trust fund. That timeframe could be prohibitive to institutions.
- A possible recommendation from the workgroup could be to adjust the timeframe.
- The state has gained the ability to be more proactive if a school closes, has new tools for collection of student records.
- Some institutions are exempt from paying into fund. There are a specific set of requirements.
- Thinking about contributions to the fund, should there be a cap on the number of years they contribute to fund?

Structure of TRTF:

- Need to figure out what amount is needed for the fund.
 - Five-year constraint (required by legislation) would make it very difficult on some schools
- TRTF expands what the agency can use the funds for.
 - Used for prepaid, unearned tuition and fees (like AZ fund model)
- Excludes Title IV, which are federally-funded loans.
- Need to figure out the floor and ceiling amount for the trust fund.
- Desire to be prepared to cover Title IV funds.
- Fee structure from column four (spreadsheet attached) seems the most equitable.

Emerging paths forward:

- Different funding mechanisms,
- Possibility of funding through Legislature from money that was moved from the WTB fund to general fund (\$2.5 million)?
- As years of funding increase, the amount of money each school contributes decreases.
- Are there ways to structure beyond a flat fee structure? Schools generating different amounts of money would contribute different amounts.
- TRTF has larger scope than bonds. Legislature needs to make terms consistent to use bond and TRTF in the same manner (WSAC will create language around that, for the structural elements).

Next Steps:

- WSAC will crunch numbers for floor and ceiling. Create hypothetical case study.
- Potential coalescing around 4th column
- Optimal use of fund: also providing students with records for continuing education forward

Next meeting: August 22, 2018, 9:30am-12pm, WSAC offices (917 Lakeridge Way SW | Olympia, WA 98502)

**Draft Tuition Recovery Trust Fund Workgroup Meeting Notes
August 22, 2018, 9:30am-12pm, WSAC Office**

Attendees:

Maryann Brathwaite: Northwest Career Colleges Federation (NWCCF—Executive Director)
Sam Loftin, Deb O’Neill, Tivoli Sharp: Washington Student Achievement Council (WSAC)
Marina Parr: Workforce Training & Education Coordinating Board (WTB)
David Shulman: Seattle Film Institute (Proprietor)
Marla Skelley: Washington Student Achievement Council

Observational/Informational Role Only:

Kellee Gunn: Analyst, Senate Committee Services
Alicia Kinne-Clawson: Analyst, Senate Committee Services
Stephanie Nelson: Policy Analyst, House Republican Caucus
Shaundra Richartz: Staff Counsel, Senate Republican Caucus (phone)

Facilitation Team:

Chris Page, Maggie Counihan: The Ruckelshaus Center

Goal of Meeting:

To finalize a proposed structure for a Tuition Recovery Trust Fund (TRTF) for WSAC in a way that satisfies the terms of ESSHB 1439 and considers the needs of all parties.

TRTF Purpose:

A TRTF is designed to provide funds more quickly accessible (than surety bond/s) to make students whole in the event of a school closure—and, at least for the WTB TRTF, in case of other adverse events. It would not necessarily have to be a “catastrophic event.” It could be a program closure that adversely impacts students, or an actionable complaint relating to an individual student (WTB has had such instances where they have had to tap TRTF).

ESSHB 1439 Concerns:

The section of ESSHB 1439 enacting the new WSAC TRTF intends the TRTF to be used in the event of school closures. However, it is unclear if the TRTF may also be utilized to provide relief to students in circumstances unrelated to school closures. The workgroup agreed that such an expanded scope of relief would offer greater student protection and would be consistent with the apparent purpose of ESSHB 1439. Additionally, it would bring increased consistency in the regulation of postsecondary institutions in Washington, as the Workforce Training and Education Coordinating Board (WTB) TRTF is not limited to school closure events.

Potential Recommendations:

The workgroup suggested the following recommendations:

- In the absence of clear authority to use the WSAC TRTF for non-closure events, the workgroup recommends legislative action to increase student protections by amending the WSAC TRTF so that it may be used for non-closure events (e.g. program closure, individual student complaints).

- Allowing a longer than five-year ramp-up period to capitalize the TRTF (e.g. (7-10 years). This will decrease the likelihood of increased tuition by mitigating the burden on schools. The five-year period is established in HB 1439; however, the Legislature could change this in 2019 as WSAC goes through rulemaking on TRTF.
- Recommendation for next legislative session could be to request elimination of the need for documentation of expenses (to tap a surety bond to make students whole), since there may not be enough time to collect documents.

For informational purposes:

- Characteristics of the fund, including the fee schedule, to be established by WSAC, in coordination with NWCCF, e.g. minimum fund amount (*WSAC suggests \$1 million, to discuss with NWCCF in conference call*)
- Clarify that the TRTF would cover prepaid, unearned, non-Title-IV tuition and fee costs. WSAC will write the rule so the TRTF can cover other costs, e.g. to procure student records (as needed in the aftermath of the ITT closure), plus costs associated with a catastrophic event beyond unearned tuition and fees.
- As currently written, schools would pay into a bond in perpetuity in conjunction with TRTF. Are institutions aware that they would pay into both the surety bond and the TRTF? Paying into bond and TRTF could be burdensome on institutions. It could lessen the burden on schools by lengthening the ramp-up time for fully funding the TRTF and/or lowering the surety bond amount requirements as TRTF approaches full funding. Schools request a gradual lowering of the required surety bond payment amount as TRTF reaches solvency.
- Exhibits:
 - inter-agency Memorandum of Agreement, including Uniform School Closure Checklist
 - Potential attachments, proposed by non-agency participants:
 - Surety bond payment schedule from Seattle Film Institute
 - Suggested alternative TRTF funding source, e.g. B&O tax credits from “authorized institutions” or restoring \$1M from the \$2.5M “repurposed” by the Legislature out of the WTB TRTF into the state general fund.
- Recommend making the terms (language) of both surety bonds and TRTF consistent, to make student protection processes easier and better.

Questions & Comments Related to Recommendations:

- Legislature may not choose to enact the workgroup’s suggested changes. In that case, WSAC would need to implement the TRTF as ESSHB 1439 currently dictates.
- WSAC has drafted a potential contribution schedule, with years and amounts. Notes:
 - States vary on how they create them.
 - WTB’s is unique because they provide percentages.
 - Amount would not be based on the total annual tuition, it would be for one term’s total tuition and based on assumption that ~30% of students are paying out of pocket.
 - 1439 doesn’t say the agency needs to keep collecting money after reaching minimum level. It is unclear whether the bill authorizes WSAC to continue collection after reaching the sufficient level of fund (WTB bill is worded differently).
- Could the uses allowed by the WSAC TRTF be worded in a similar manner as WTB?
- It would afford better student protections by authorizing continued fee collection beyond the minimum amount (if the Legislature decides to look at bill again)

- Potential resistance from schools re: continued collection, relatively low unearned tuition from schools; wants WSAC to show need if they want to continue collecting over minimum amount.
- Did the Legislature intend the TRTF to cover all institutions? ESSHB 1439 does not apply to institutions exempt from degree authorization. This has potential political ramifications: exempting schools from surety bonds or TRTF based on financial records (e.g. demonstrating stability over a 15-year period) could be seen as unequitable, so the workgroup should make sure the Legislature knows that some schools are exempt from paying into either.
 - Should exempt schools contribute? (The exemptions can be rescinded.)
 - The Legislature could have dialogue around this issue.

Timeframe Extension:

- Having the TRTF required to be fully funded in just five years will be burdensome to some institutions.
- If Legislature is open to a change in timeframe (extending to 10 years), the workgroup coalesced in supporting the 4th column in the WSAC fee schedule spreadsheet (to be included as attachment to report to Legislature). Would the Legislature consider extending it to 10 years?
- The contribution schedule does not contemplate any change in surety bond

Notes on Alternative Funding Approaches:

- Potential alternate funding could be to use the B&O tax.
- Consider restoring \$1 million of \$2.5 million the Legislature repurposed from WTB TRTF to general fund. NOTE: on this suggestion, made by a participant, the agencies are “agnostic”; the full workgroup did not oppose the idea, though raised the question whether proposing alternate funding sources could alter the Legislature’s perceptions of the full set of recommendations.

Potential attachments

- Uniform school closure checklist
- Interagency MOA
- Overview of interagency workgroup known as the Compliance Review Team

Miscellaneous:

- WTB does not consider Title IV funds as part of money that gets refunded to students. Students can get relief from loan discharge programs.
- Current language doesn’t let WSAC create a range for the amounts it collects for the TRTF.
- Important to note that surety bond is a security requirement; some schools have cash in the bank so do not use a bond (small portion of schools, but option available to all).

Appendix I - Draft Ombuds Workgroup Meeting Notes

Ombuds Workgroup Meeting September 10, 2018, 9:30am-12pm, WSAC Office

Attendees:

Maryann Brathwaite, Amy Brackenbury (phone): Northwest Career Colleges Federation (NWCCF)
Susan Colard: WA Department of Licensing (DOL)
Ruben Flores: WA State Board for Community and Technical Colleges(SBCTC)
Nova Gattman, Jim Parker: Workforce Training & Education Coordinating Board (WTB)
Sam Loftin, Deb O’Neill, Tivoli Sharp, Marla Skelley: Washington Student Achievement Council (WSAC)
Mindy Schaffner (phone): WA Department of Health (DOH)

Observational/Informational Role Only:

Steve Ellis: Staff, Senate Democratic Caucus
Kellee Gunn (phone): Analyst, Senate Committee Services
Kacie Masten: Legislative Assistant to Representative Pollet
Megan Mulvihill: Analyst, House Higher Education Joint Committee
Shaundra Richartz (phone): Staff Counsel, Senate Republican Caucus
Trudes Tango: Counsel, House Office of Program Research

Facilitation Team: Chris Page, Maggie Counihan – The Ruckelshaus Center

Updates related to the Tuition Recovery Trust Fund (TRTF)

- The TRTF workgroup held two productive meetings, resulting in agreement on specific recommendations to the Legislature and increased understanding between representatives of the NWCCF and WSAC.
- WSAC will engage in a rulemaking process to implement the TRTF.
- DOL has started a rulemaking process for their TRTF, which will be implemented soon.

Report on June 2018 Call with Representative Pollet on Legislative Intent

- Goal is to have one point of contact for students, no matter what agency school reports to.
- There may be some crossover with the student loan advocate position that WSAC is hiring for.
- Representative Pollet says he defers to the three agencies in lead roles (WSAC, WTB, DOL).
- Workgroup should consider whether ombuds should be able to help graduates of any/all higher education institutions (i.e. not just those overseen by WSAC, WTB, and DOL)?

Federal Policy Changes

- U.S. Department of Education is considering an application process for students to get loan discharges. Currently it is automatic.
- Another proposed rule change would make it so any student whose program or school closes who chooses to transfer credits for teach-out would be disqualified from getting a loan discharge.

Ideal Outcomes for Workgroup

- Agencies deal with a lot of student complaints and would like:
 - To find ways to improve on processes already in place, and
 - For people to recognize that the level of work could be a two-person job, instead of one.
- Clear roles and responsibilities of a prospective ombuds position.
- Better communication among agencies.
- Students still don't understand where to go or who to talk to when they have an issue. Looking forward to having a central location.
- The state needs to serve as a resource for students, and ideally should have some flexibility in doing so.
- Help for students in navigating federal financial aid rules and landscape.
- Aid for students for other areas of complaints.

Potential Roles of Ombuds

- Where will it be housed? Who pays for it? Will it be combined with another position?
- Concern that the amount of work will be too much for one person.
- Concern that the intent of the ombuds is to serve as an advocate for students, a different role than agencies (they are impartial).
- Ombuds should fill whatever needs don't get covered by student loan advocate, agencies, and new complaint portal.
- Would ombuds serve only private career colleges? Though a lot of the public universities have ombuds position already, and private institutions have responsibilities to address complaints, any potential ombuds should be responsive to students of all higher ed institutions.
- Potential duties/roles of ombuds:
 - Central point of contact
 - Help students find agency, but not get into processes
 - Triage and routing for complaints
- The ombuds should assist students with navigating and understanding the complaint process but not act as a representative or advocate because:
 - Workload would be too heavy (case work takes a lot of hours, and is very intricate)
 - Person/position would not have access to all the information needed
 - Questions around legality, and (lack of) authority.
- Ombuds should help with more than federal financial aid, e.g. should track articulation agreements.
- Don't want to interfere with investigation of complaints.
- If Legislature wants a caseworker/advocate model, it should be housed in the A.G.'s office.
- Ombuds should participate in Compliance Review Team (CRT) quarterly meetings

Student Complaint Portal

- Is a new position (person) the right route to go, or should the next step be a website? What about an interactive portal, with FAQ's updated by all the agencies? It could have scenarios and route students, make clear all the options available (to students). This would be better than one person who just knows a limited amount.
- WSAC is leading the development of an online complaint portal now, forecast to be up and running by mid-October.
- It will allow students to log in and track the status of their complaint.

- It will allow the agencies to collect data on the frequency, type, and number of complaints.

Student Loan Advocate (SLA) Position

- WSAC will be filling the position soon.
- Support for the SLA position comes from a servicing problem. Students were not getting accurate information or contact with servicers.
- Many of the calls could be categorized as inquires not complaints and students are usually directed to institutional processes.
- Could provide information on loan discharge

Recommendation

Option A (Recommended)

Given the already-authorized SLA and in-progress student complaint portal, the workgroup recommends

- The CRT gauge how well these two resources address student needs while collecting info from both the portal and the SLA.
- Reporting to the Legislature at the end of a year (Sept. 1).
- Bulking up the portal (potentially with additional resources to WSAC).
- The CRT, after a year, consider recommend whether to have a “navigator”-type ombuds position (this may need a statutory change); by 12/1/19, WSAC will be able to prepare estimate of any potential additional resources needed to address student complaints with an adequate level of resources.

Option B (Not Recommended at This Time)

Legislature can, if it sees the need after considering the deliberations of this workgroup and all other available information, go ahead and establish a new ombuds position to serve students of for-profit higher ed. institutions and private vocational schools. If the position is designed as advocate, it should be housed in the Attorney General’s office.

**For-Profit Higher Ed Institution Ombuds Workgroup Conference Call
Draft Ombuds Workgroup Conference Call Notes
September 24, 2018, 10am-11:30am**

Attendees:

Maryann Brathwaite: Northwest Career Colleges Federation (NWCCF)
Ruben Flores: WA State Board for Community and Technical Colleges(SBCTC)
Nova Gattman: Workforce Training & Education Coordinating Board (WTB)
Sam Loftin, Deb O’Neill, Tivoli Sharp, Marla Skelley: Washington Student Achievement Council (WSAC)
Representative Pollet: 46th Legislative District

Observational/Informational Role Only:

Debbie Driver: Analyst, House Democratic Caucus
Kacie Masten: Legislative Assistant to Representative Pollet
Megan Mulvihill: Analyst, House Higher Education Joint Committee

Facilitation Team: Chris Page, Maggie Counihan – The Ruckelshaus Center

Legislative intent of ombuds section of HB 1439

- A student loan ombuds would serve to protect student rights in the event of a school closure or misrepresentation.
- A comprehensive place for students to have their complaints addressed.

How agencies currently handle complaints

- The student loan advocate (SLA) will address complaints that are different than those an ombuds would address.
- There are current processes in place for accepting and reviewing complaints. Interviews and investigations are extensive.
- Agencies refer complaints to other agencies and the AG's office if needed. As regulators, the agencies are a neutral party (i.e. will not suggest a specific direction is best for a student).
- The Compliance Review Team (CRT) meets quarterly to talk about trends, specific institutions, and helps keep clear communication between agencies.

How online complaint portal will function

- The portal will track complaints from when they are received to resolution, allows students to see what stage their complaints is at, and track student satisfaction.
- Allows agencies to provide comprehensive information, email students directly and for students to contact agencies directly.

Adequacy of online portal as primary resource

- The portal will track the number and type of complaints.
- It will have a component for aid complaints.

Ensuring student awareness of state resources and support

- The Workforce Board (WTB) has a form regarding complaint process that students are guided through when they enroll. It covers information about their rights, that they are able to contact the AG's office or participate in mediation.
- Form is provided in multiple locations -from enrolling to course catalogues.
- SB 5022: WA student loan transparency act- requires institutions to send notifications to students who have applied for financial aid information that includes an estimate of the total amount of loans, potential total payoff amount or range of total payoff amount, monthly repayment amount, percentage of borrowing limit applicable to student's program of study, and information about the difference between private loans and federal loans. Notifications also need to have information about how students can access resources (student loan debt hotline, website or student education loan ombuds, federal loan repayment calculator).

Next Steps:

- Document processes in place including how students get information, via a hypothetical sudden school closure case study, say 2021 closure
- Process changes that have taken place since ITT closure

Appendix J – Hypothetical School Closure Scenario

Ombuds Recommendation Continued: Hypothetical School Closure Scenario, e.g. in 2021, with Option A in place:

To illustrate the adequacy of resources for (and publicity to) students, the workgroup envisioned a sudden closure by a school overseen by both WSAC and the Workforce Board. Below are responses to specific requests made by Representative Gerry Pollet in a conference call on September 24, 2018 with members of the workgroup.

Bold italicized questions below articulate the specific questions state agencies were asked to address, in that hypothetical sudden closure. Agency responses are in non-bold italics.

1. “Who will give students their rights in writing, and how will the state ensure they get the notice immediately?”

Agency response:

The needs/concerns that students have upon a closure event are not necessarily the same as the “rights” students have based on catalogs, enrollment agreements, etc. Here’s how we would respond to the immediate needs/concerns of students upon a school closure:

- *Completion of degree program: As soon as we determine that an institution is closing (or is at serious risk of closure), we require them to provide information regarding student options for degree completion (teach-out agreement, transfer agreements, etc.), as well as other elements identified in rule such as student name and contact information. In the event of a sudden closure, we would contact those students and provide information relating to degree program completion options. We would also travel to the school and hold informational meetings with students to provide in-person information and answer questions, etc.*
- *Complaints and reimbursements: In a sudden closure, agency communications to students would include a request for complaint information that would allow us to submit a claim against the surety bond and/or tuition recovery trust fund and take action to obtain recovery on the student’s behalf.*
- *Student loan discharge information: agency/agencies would provide information to students about available remedies, including student loan discharge. The Student Loan Advocate would be available to provide comprehensive information and assistance with respect to this issue.*
- *Communications plan: agency/agencies would work with communications team/s and with any other relevant agencies (e.g. SBCTC) and stakeholders as needed to broadly disseminate information and resources to affected students. This would include, at a minimum, posting information on agency websites and coordinating student support with other appropriate agencies and institutions.*

2. “Who will assist students in navigating their choices (e.g. loan discharge vs. credit transfer) within a short period of time, or who/what will require school to give students more time (than three days)?”

Agency response:

A school closure is viewed as a top priority of the agency staff. The Student Loan Advocate and other agency staff members who can provide assistance in person or remotely. The amount of time students

has to make decisions that impact their progress towards degree depends on a number of factors, including the timing of the school closure.

3. How will up to 300 students know their choices and rights, and have the info they need to make big decision/s within those three days (or can agencies find ways to give students more time)?

Agency response:

See above and attached school closure policy. Agency staff would immediately begin providing information to students about their options and about resources to help students make those decisions.

4. Who makes sure student/consumer rights get protected?

Agency response:

Agency staff. See above and attached school closure policy.

5. Who will explain federal student loan rights?

Agency response:

The Student Loan Advocate, with the assistance of other available agency staff.

Appendix K - Draft Data Workgroup Meeting Notes

Data Workgroup Meeting October 10, 2018 9:30am-12pm, WSAC Office

Attendees:

Maryann Brathwaite, Amy Brackenbury (phone): Northwest Career Colleges Federation (NWCCF)
Susan Colard: WA State Department of Licensing (DOL)
Nova Gattman, Dave Wallace, Marina Parr: Workforce Training & Education Coordinating Board (WTB)
Sam Loftin, Deb O’Neill, Tivoli Sharp: Washington Student Achievement Council (WSAC)
Angela Roccograndi (phone), Erich Stiefvater (phone): Education Northwest

Observational/Informational Role Only:

Steve Ellis: Staff, Senate Democratic Caucus
Trudes Tango: Counsel, House Office of Program Research

Facilitation Team:

Chris Page, Maggie Counihan: The Ruckelshaus Center

Updates from Previous Meetings:

Ruckelshaus Center staff are working with WSAC and WTB to finalize the ombuds workgroup’s findings and recommendations.

Goals, Ideal Outcomes, Workplan for Group:

The workgroup discussed desired goals and outcomes related to data standardization, collection, and sharing. Suggestions included:

- Tying the work to House Bill 1439 by making whatever metrics state agencies measure consistent with those published on Career Bridge.
- Ideal outcome would be to come up with a plan for any prospective student of higher education to have online access to make “apples-to-apples” comparisons of program costs and outcomes (completion and employment rates, earnings, average debt levels) for all potential higher education areas of study.
- Improving consistency across agencies by clarifying what metrics each agency collects and addressing what current inconsistencies exist (schools have expressed frustration about a lack of consistency regarding what is reported on Career bridge and what schools report).
 - **Q.** What are specific inconsistencies, so we know what we need to address? **A.** Current inconsistencies include difficulties tracking out-of-USA employment and self-employed graduates; also, accredited schools can report different information than non-accredited schools.
- Consistent reporting, which would include aligning metrics with both:
 - The Eligible Training Provider List (ETPL) that the federal government requires states to maintain, and
 - Major accreditors.

Research Option:

The group talked about whether research would help to reach their goals, and if so, what research would be most useful. The workgroup agreed that it would help to find out what data certain accreditors collect, how each accreditor defines each metric, and what constraints exist with those data.

Potential Rulemaking:

To align reporting metrics, DOL and WTB may need to develop a data-sharing agreement until all DOL schools are using the WTB portal. To make data available for all sectors would require statutory changes; none of the agencies participating in this workgroup have authority over public four-year schools or the Independent Colleges of Washington schools.

Current System:

The current online database that carries metrics for institutions is the Workforce Board's Career bridge portal. It is voluntary for degree-granting schools and public institutions, neither of which WTB oversees. It also does not list all programs from institutions reporting data. There are some programs on Career bridge that are not listed on the ETPL. They have to request and meet certain standards to be listed on ETPL.

WSAC doesn't collect general student-level data since they look at data to assess trends; however, their financial assistance group collects some student-level info. DOL doesn't have requirement for schools to report. WSAC would need it too.

Data Collection:

The group discussed what type of data is currently collected and what else would be useful.

- Data currently collected by WTB include:
 - Completion rate,
 - Job placement rate,
 - Earnings of graduates, and
 - Industry of employment.
- Useful data to collect: information about student loan indebtedness.

Applied Research to Inform What Metrics to Use (How to Measure Each Key Data Point)

Participants agreed that to attain the goal of having standardized metrics for all reporting that schools must do, it would help to know how major accreditors measure the key data categories in the above bulleted list. The group agreed to commission Education Northwest, the research firm used in the first phases of this work, to conduct additional research. One representative each from WTB, WSAC, and NWCCF will send the Ruckelshaus Center staff the names of accreditors that would be worth contacting.

Findings and Recommendations

The workgroup discussed and eventually agreed on the basic elements of a system that could provide prospective higher education students to make apples-to-apples comparisons across programs and institutions, acknowledging that it makes sense to align the recommended measurements for key metrics with those collected by major accreditors. The group will work to finalize the recommendation when the accreditor information is available, likely at its November 5, 2018 meeting.

NOTE: Since fairness to institutions and the public would involve true apples-to-apples comparison of all programs and institutions for students, it would require the collection of performance results for post-

secondary institutions beyond those addressed by ESHB 1439 (private for-profit, community and technical, and even public four-year and independent schools). This would impact the State Board of Community and Technical Colleges, Independent Colleges of Washington, and Education Research and Data Center. The group agreed that since those entities have not been directly involved in this discussion, it would be good to give them the courtesy of communicating these emerging recommendations as they get closer to final.

Next meeting: November 5, 2018 at WSAC Offices from 9:30am-12pm

**Draft Data Workgroup Meeting Notes
November 5, 2018, 9:30am-12pm, WSAC Office**

Attendees:

Maryann Brathwaite: Northwest Career Colleges Federation (NWCCF)
Nova Gattman, Jim Parker, Marina Parr, Dave Wallace: Workforce Training & Education Coordinating Board (WTB)
Sam Loftin, Tivoli Sharp, Marla Skelley, Kelly Olson: Washington Student Achievement Council (WSAC)
Erich Stiefvater, Angela Roccograndi (phone): Education Northwest

Observational/Informational Role Only:

Kellee Gunn (phone): Analyst, Senate Committee Services
Stephanie Nelson (phone): Policy Analyst, House Republican Caucus

Facilitation Team: Phyllis Shulman, Maggie Counihan – The Ruckelshaus Center

Updates:

The workgroup wanted to emphasize that the findings and recommendations they have been discussing are still preliminary. WSAC also highlighted that it does not have authority to require exempt institutions to submit outcomes-related data under the Degree-Granting Institutions Act.

Research Results from Education Northwest:

Education Northwest (Ed NW) had conducted research on performance metrics (completion rate, job-placement rate, earnings of graduates, industry of employment and loan indebtedness) for the workgroup and phoned into the meeting to discuss the findings with the group.

Ed NW collected information from 8 of 10 accrediting agencies that the workgroup has asked for information on. All of the accreditors require some kind of reporting, but the way they calculate some of the metrics varies between accreditors. None of the accreditors are collecting student-level data. Ed NW explained the tables that are included in the report and noted that Table 5 shows other indicators that accreditors may look at.

Goals:

- Improve consumers' ability to make educated choices
- Streamline data
- Create a level playing field so that consumers can make like comparisons

- Standardize collection and reporting, have verifiable data
- Provide as much substantive info to consumers in one place

Discussion about Metrics:

The workgroup discussed standardizing what is collected and what is reported by institutions, aligning what is reported by institutions and what is on Career Bridge. They are interested in hearing from cosmetology schools about what metrics are top priorities for them and also what are areas of concern regarding submitting data and reporting requirements.

Having institutions provide student-level data helps the Workforce Board conduct independent and fair evaluations of data. Self-employment is not measured very well on Career Bridge.

Unaccredited schools will have the largest burden to report student-level data because of limited resources.

Miscellaneous:

There was a discussion around privacy of data. Data that is posted on Career Bridge are aggregates of what is reported (ex. For performance rate indicator if there is less than 25 people, it will not be posted on the site).

Could address possible concerns from 4-year institutions allowing graduate rates be calculated based on a 5 year completion instead of 4 year.

The Workforce Board is collecting student-level data from a majority of institutions, the question is can it be standardized across the board.

Agency Resource Increase:

The agencies will develop a baseline estimate for additional resources needed including the cost for bolstering the website, potential increases in FTE, and expansion of an outreach campaign. Agencies will discuss the preliminary findings and recommendations including the baseline estimate for additional resources with their respective leadership teams.

Publicizing to Prospective Students:

Outreach and expanding awareness of the information available to consumers is a critical aspect of meeting the overall goals. To maximize awareness there would need to be an increase in the budget for outreach and consumer education.

Emerging Findings and Recommendations:

- Primary option is for all institutions/programs to apply for ETPL participation so that employment-related outcomes are based on federal data. Data will include outcomes-related measures currently included on Career Bridge with potential links to College Scorecard and/or the Integrated Postsecondary Education Data System (IPEDS) for reference to additional information not currently found on Career Bridge.
- Secondary option: require everyone to report student-level data, but no requirement to be on the ETPL. This would limit data to only include information on Washington and Oregon employment placement data.

- There are already two bills that address loan indebtedness that passed the Legislature in the past two years (SB 5022 and SB 6029). Could link these into workgroup recommendation.
- Add an additional field for four-year universities to define completion rates as a five-year period.
- Add a clear definition for what is meant by “all institutions that would be affected” in the final findings and recommendations
- Add additional links on Career Bridge to websites that can be helpful on student loans.
- Add in the final report a section that is in addition to key recommendations that are possible future actions that could compliment the recommendations including: adding additional data to Career Bridge on pass rates and loan indebtedness

Next Steps:

- The workgroup asked the Ed NW research an accreditor of cosmetology schools to identify what data they collect and to do additional research on reporting timelines. They will research it and get back to the group.
- The agencies will talk with their executive leadership teams about the emerging, preliminary recommendations that the workgroup is discussing. Agencies will report back and discuss at the next meeting any concerns or information brought up by the meetings with the leadership teams.
- Collect more understanding of ETPL through a discussion with the Department of Labor and decide at the next meeting if all institutions will be evaluated on the ETPL or just report based on Washington and Oregon data.
- There will be a conversation with the Independent Colleges of Washington (ICW's) and the Council of Presidents (COP) about the preliminary recommendations that are emerging.
- Get additional information on priority areas for data collection from cosmetology schools and decide at the next meeting whether there needs to be modifications on requirements for data collection related to cosmetology schools.
- Confirm agreement at the next meeting about the definition of “all”.
- WSAC will be responsible for reaching out to exempt schools.
- The next meeting will focus on ironing out final nuances, discussion of outstanding items, and agreement. Then conversations will be had with public universities and community colleges on the preliminary recommendations. The meeting in December will focus on final approval of findings and recommendations.

Next meeting: November 19, 2018 at WSAC offices, 9:30am-12pm

Appendix L – MEMORANDUM OF AGREEMENT

Between

- Department of Health, Nursing Care Quality Assurance Commission
- Department of Licensing
- Washington Student Achievement Council
- Workforce Training and Education Coordinating Board

This Memorandum of Agreement (MOA) is made and entered into by and between the Department of Health Nursing Care Quality Assurance Commission (Nursing Commission), the Department of Licensing (DOL), the Washington Student Achievement Council (WSAC), and the Workforce Training & Education Coordinating Board (WTB) to establish collaborative practices that improve state oversight of higher education institutions in Washington State. This MOA amends and supersedes any previous Memoranda of Agreement among the participating agencies relating to the below purposes.

The purposes of this Memorandum of Agreement are to:

- (1) Articulate a shared vision and a statement of values to guide interagency oversight and regulation of for-profit higher education institutions and private vocational schools;
- (2) Clarify each agency’s regulatory responsibilities;
- (3) Enact agreements regarding the application of agency responsibilities;
- (4) Establish clear and coordinated responses to unplanned school closures;
- (5) Provide guidance regarding the identification and response to schools at risk of closure;
- (6) Develop an ongoing workgroup to support interagency collaboration and alignment of practices.

I. Shared Vision and Statement of Values

The participating agencies agree that their work relating to the regulation of for-profit higher education institutions and private vocational schools shall be guided by the below “Vision Statement” and “Values.”

Vision Statement: A wide range of education and training options for a diverse group of students. Coordinated oversight to ensure transparency of requirements and outcomes, and to prepare students for educational success, employment and civic engagement.

Values: Fairness, Integrity, Success, Safety.

II. Agency Responsibilities

The Nursing Commission applies RCW 18.79, RCW 18.88A, WAC 246-840 and WAC 246-841 in the regulation of nursing assistant and professional nursing education schools and programs. Their purposes are to regulate the competency and quality of professional health care providers by establishing,

monitoring and enforcing qualifications for licensing, consistent standards of practice, continuing competency mechanisms, and discipline. The Nursing Commission also establishes nursing assistant and nursing education requirements and reviews/approves all levels of nursing education.

DOL applies RCW 18.16, RCW 18.235, and WAC 308-20 in the licensure of businesses and professions specified in law. Their purposes are to provide standardized procedures for the regulation of businesses and professions and the enforcement of laws that assure the public of the adequacy of business and professional competence and conduct.

WSAC applies RCW 28B.85 and WAC 25-61 in the authorization of degree-granting programs. Their purposes are to ensure fair business practices and adequate quality among degree-granting institutions operating in the state of Washington and to protect citizens against substandard, fraudulent, and deceptive practices.

WTB applies RCW 28C.10 and WAC 490-105 in the licensure and regulation of non-degree programs. Their purposes are to protect against practices by private vocational schools which are false, deceptive, misleading, or unfair, and to help ensure adequate educational quality at private vocational schools.

III. Agency Agreements

A. Agency actions and roles

The Nursing Commission will, in accordance with RCW 18.79: (a) approve curricula and establish criteria for minimum standards for schools preparing persons for licensing as registered nurses, advanced registered nurse practitioners, and licensed practical nurses; (b) approve such schools of nursing as meeting the requirements of RCW 18.79 and the commission; and (c) approve establishment of basic nursing education programs consistent with established criteria. The Nursing Commission establishes criteria as to the need, size, type, and geographical location of nursing programs.

The Nursing Commission will, in accordance with RCW 18.88A: (a) determine minimum nursing assistant education requirements and approve training programs; (b) approve education and training programs and examinations for medication assistants as provided in RCW 18.88A.082; (c) define the prescriber-ordered treatments a medication assistant is authorized to perform under RCW 18.88A.082; (d) prepare, grade, and administer, or determine the nature of, and supervise the grading and administration of, the competency evaluation for applicants for nursing assistant certification, using the same competency evaluation for all applicants, whether qualifying to take the competency evaluation under an approved training program or alternative training; (e) establish forms and procedures for evaluation of an applicant's alternative training under criteria adopted pursuant to RCW 18.88A.087; and (f) define and approve any experience requirement for nursing assistant certification.

The DOL will secure the application of a cosmetology, hair design, barber, manicurist, or esthetician school and, in accordance with RCW 18.16: (a) collect application fees and deposits in the DOL Tuition Recovery Trust Fund; (b) maintain the official department record of applicants and licensees; (c) set

license expiration dates and renewal periods for all licenses; and (d) make information available to the department of revenue to assist in collecting taxes from persons required to be licensed.

WSAC will secure the application of an institution offering academic courses or degree programs and, in accordance with RCW 28B.85: (a) collect application fees and deposits into the WSAC Tuition Recovery Trust Fund; (b) maintain security requirements; (c) approve or deny applications for authorization of degree programs; and (d) process any complaints received from degree seeking students.

The WTB will secure the application of a private vocational school and, in accordance with RCW 28BC.10: (a) collect application fees and deposits into the WTB Tuition Recovery Fund, based on gross annual tuition derived from non-degree program(s); (b) approve or deny applications for licensure of non-degree programs; and (c) process any complaints received from non-degree seeking students.

B. Schools that offer both degree and non-degree programs

In the event a school offers both degree programs and non-degree programs, WSAC will secure an application for the degree programs and the WTB will secure an application for the non-degree programs.

C. Jurisdictional considerations

Approval, authorization, and licensure are programmatic. Any institution that is approved, authorized, or licensed by one agency and intends to offer programs falling outside the jurisdiction of that agency shall apply to the appropriate agency for program approval, authorization, or licensure.

D. Authorization and approval of nursing programs

Institutions seeking to offer nursing degree programs must obtain both WSAC authorization and Nursing Commission approval. WSAC will complete an initial application review and make a determination regarding authorization. If authorization is appropriate, WSAC will grant authorization pending Nursing Commission approval. If Nursing Commission approval is later obtained, WSAC will grant full authorization of the nursing program.

Institutions seeking to offer nursing certificate programs must obtain both WTB approval and Nursing Commission approval. WTB will complete an initial application review and make a determination regarding licensure. If licensure is appropriate, WTB will grant licensure pending Nursing Commission approval. If Nursing Commission approval is later obtained, WTB will grant full licensure of the nursing program.

E. Joint Complaint Portal

DOL, WSAC, and WTB shall collaborate to establish a single portal for student complaints regarding issues related to consumer protection, disclosures, school or program closures, or other violations committed by institutions regulated by these agencies. Other agencies may choose to participate in the complaint portal at their discretion and in a manner consistent with this purpose. WSAC shall facilitate a

contract or subscription service with a third-party vendor to provide the complaint portal and shall invoice other participating agencies on a pro-rata basis consistent with the terms and conditions of the contract or subscription service. Complaints shall be received through the portal and directed to the appropriate agency.

IV. Unplanned School Closures

A. Interagency collaboration

Participating agencies agree to engage in collaborative practices designed to protect students and members of the public in the event of school closures. Agencies will collaborate based on principles of transparency and cooperation and will utilize their collective resources to achieve these objectives.

B. Designation of lead agency

Participating agencies agree that, upon receipt of notice of a school closure, they will promptly provide notice of such closure to the members of the interagency workgroup created by this agreement. Participating agencies shall designate a lead agency consistent with the jurisdictional responsibilities outlined in this agreement.

The lead agency for any school closure will maintain responsibility for enacting a response and communication plan and may seek assistance from partner agencies, as necessary and appropriate.

C. Response and communication plan

Participating agencies agree that the response and communication plan for any school closure event will account for the following items, at a minimum:

- i. Immediate procurement of the following items:
 - 1. Administrative contacts;
 - 2. Student lists, including names, contact information, programmatic information, and accounting ledgers;
 - 3. Student records, including transcripts;
 - 4. Access to buildings
- ii. Initial contact with students
- iii. Subsequent communications with students
- iv. Communications with other agencies and the public
- v. Collection and prompt response to student complaints

Each participating agency shall submit and maintain current a school closure response and communication plan that includes specific actions it shall take in the event of a closure, as well as staff members responsible for those actions. Additionally, each agency agrees to follow the uniform school closure checklist attached to this MOA as Appendix A.

V. Schools at Risk of Closure

A. Designation of “at-risk” status

Participating agencies agree that agencies with rules or policies for designating institutions as at risk of closure shall apply their agency rules or policies in determining whether an institution within its regulatory authority is at risk of closure.

B. Response and communication plan

In the event a participating agency designates a school within its regulatory authority as at risk of closure, that agency shall promptly take action to obtain, at a minimum, the following information:

- i. Name and contact information for currently-enrolled students, including email and phone number;
- ii. List of students enrolled in each available program, including number of credits earned and number of credits remaining to complete degree; and
- iii. Storage location and maintenance policy for student records.

Participating agencies agree that, upon designation of a school as at risk of closure, they will promptly provide notice of such designation to the members of the interagency workgroup created by this agreement.

VI. Interagency Workgroup

A. Purpose and objectives

The purpose of the interagency workgroup is to share information about schools that have closed or are at risk of closure; to engage in ongoing collaboration in response to such closures or risks of closures; to share resources that will better enable each respective agency to protect consumers and carry out its mission; and to collectively assist institutions in the provision of high-quality educational opportunities for Washington residents.

B. Meetings

The interagency workgroup agrees to meet on a quarterly basis in order to satisfy its stated objectives and to hold additional meetings, as necessary, in response to sudden closure events or other concerns. Meetings shall rotate among participating agencies and shall be chaired on a rotating basis by the host agency.

C. Development of disclosure statement

For programs with shared authority and/or additional authorization or approval requirements, the participating agencies agree to provide institutions notice of the respective regulatory agencies in Washington, as well as instructions for complying with agency requirements.

VII. Understanding of the Parties

This agreement shall be effective on the date of execution, as evidenced by the dates and signatures of each party appearing below, and is continuous in nature. Participating agencies may withdraw from this

agreement at will by providing written notice to each remaining party no less than ninety days prior to the contemplated date of termination.

This agreement may be waived, changed, modified, or amended only by a written instrument signed and dated by each participating party which shall thereupon be attached hereto and incorporated herein by reference.

In witness whereof, the parties have executed this Memorandum of Agreement.

Paula Meyer
Executive Director
Washington State Nursing Care Quality Assurance Commission

Date

[Name]
Executive Director/other title
Department of Licensing

Date

Eleni Papadakis
Executive Director
Workforce Training & Education Coordinating Board

Date

Michael Meotti
Executive Director
Washington Student Achievement Council

Date

Appendix M – Education Northwest Accreditor Performance Indicators



Postsecondary Accreditor Performance Indicators Report for the Data Collection, Standardization, and Sharing Workgroup

The William D. Ruckelshaus Center
Updated November 13, 2018

This report identifies performance indicators and definitions used by selected postsecondary institutional and program accreditors. Its purpose is to inform the work of the Data Collection, Standardization, and Sharing (DCSS) Workgroup in identifying standard metrics for which performance data could be collected from multiple types of public and private postsecondary institutions through a streamlined reporting system and/or displayed through a publicly accessible, easy-to-navigate online interface.

The report draws on the annual reporting guidebooks and/or data dictionaries from 9 of 11¹¹ accreditors prioritized by the DCSS Workgroup:

- Accrediting Bureau of Health Education Schools (ABHES)
- Accrediting Commission of Career Schools and Colleges (ACCSC)
- Council on Occupational Education (COE)
- Higher Learning Commission (HLC)
- Middle States Commission on Higher Education (MSCHE)
- National Accrediting Commission of Career Arts and Sciences (NACCAS)
- New England Association of Schools and Colleges—Commission on Institutions of Higher Education (NEASC)¹²
- Northwest Commission on Colleges and Universities (NWCCU)
- Western Association of Schools and Colleges—Senior College and University Commission (WASC)

Education Northwest reviewed the annual reporting variables used by the nine accreditors (summarized in Appendix A) and looked for performance metrics the DCSS Workgroup identified as high interest: completion rate, job-placement rate, earnings of graduates, industry of employment, and loan indebtedness.

¹¹ Annual reporting materials are available upon request. Materials from two additional accreditors identified by the DCSS Workgroup—the Distance Education Accrediting Commission and the Transnational Association of Christian Colleges and Schools—were not available.

¹² Now called the New England Commission of Higher Education (NECHE).

Education Northwest analyzed accreditor definitions for each of the high-interest performance indicators. Where possible, accreditor definitions were compared to definitions used by the Washington Workforce Board’s Career Bridge system¹³. The tables in the following sections provide these analyses of definitions and comparisons. They are followed by a list of other accreditation performance indicators that the DCSS Workgroup might consider including in its list of standard metrics.

KEY FINDINGS

- Only one accreditor required schools to report student-level data (NACCAS).
- All accreditors we reviewed require annual reporting of enrollments and student outcomes from accredited institutions and programs, although their indicators and definitions of outcomes vary.
- Institutional accreditors generally rely on definitions and data used in institutional reporting to the U.S. Department of Education’s (USED’s) Integrated Postsecondary Education Data System (IPEDS) for student completion and graduation outcomes.
- Program/occupational accreditors more consistently collect data on student completions, job placements, and credentialing/licensure than do institutional accreditors.
- Program/occupational accreditors generally track student placement/employment outcomes for students, but they define or calculate placement/employment rates slightly differently.
- Most accreditors require reporting of data focused on indicators of student indebtedness, typically drawing from federal data collected for Title IV student aid programs. The most common measure is the three-year cohort default rate. Other Title IV indicators utilized by two or more accreditors reviewed in this report were: Financial Responsibility Composite Scores; percent of first-time, full-time students with Pell grants; and the three-year loan repayment rate.
- More than half of the accreditors we reviewed track retention at the institution or program level.
- A reporting period from July 1 through June 30 was typically used by program accreditors and accreditors of institutions with continuous enrollment. There was no standard annual report filing deadline date or timeframe among accreditors.
- Four accreditors set benchmarks which act as “red flags” for additional reporting.

¹³ The Washington Student Achievement Council (WSAC) and the Washington Department of Licensing (DOL) do not currently require annual outcome reporting for regulated schools and colleges or collect it in limited fashion. The Washington State Board for Community & Technical Colleges (SBCTC) does collect performance data from its colleges, some of which is reported through Career Bridge. This report focused primarily on Career Bridge, as it is a leading candidate for serving as a statewide and cross-institutional platform for streamlined performance data collection and reporting.

Completion Rate

Depending on their area of expertise or focus, accreditors assessed completion at the *institutional* and/or *program* levels. Six institutional accreditors assess student completion outcomes at the institutional level. Two of these accreditors collect data at both the institutional and program levels: NEASC accredits certificate programs and two- and four-year institutions while NACCAS requires schools to submit their data by program but report the completion rates at the institutional level. In most cases, institutional accretor completion variables referenced similar IPEDS variables (summarized in Appendix E). Accretor completion variables at the program level are compared to the completion metric utilized by Career Bridge. Tables 1 and 2 summarize analyses at both levels, respectively (complete analyses are available in Appendices B and C).

Table 1: Accretor Completion Indicators, Institution Level

	HLC	MSCHE	NACCAS	NEASC	NWCCU	WASC
Total degrees and certificates awarded				X		
Degrees/certificates awarded by level	From IPEDS					
Completers, by level, 150% ¹⁴		From IPEDS				
Completers, by level, 200% ¹⁵		From IPEDS				
Graduates by degree/certificate level, revised and/or adjusted cohorts, 150%		From IPEDS		From IPEDS	First time/full-time; most recent cohort year	
Graduation rate 150% by gender		From IPEDS				From IPEDS; first-time, full-time freshman
Graduation rate 150% by race/ethnicity		From IPEDS				From IPEDS; first-time, full-time freshmen
Graduates by degree/certificate level, revised and/or adjusted cohorts, 200%		From IPEDS				
Graduation rate			X			

¹⁴ Of published program length (e.g., within six years for a four-year program or three years for a two-year program).

¹⁵ Of published program length (e.g., within eight years for a four-year program or four years for a two-year program).

Table 2: Accreditor Completion Indicators, Program Level (with Career Bridge comparison)

	Career Bridge	ABHES	ACCSC	COE	NACCAS	NEASC
Numerator						
Graduates	X	X	X	X	X	
+ Additions						
Non-graduate completers				X		
Denominator						
Beginning enrollment	X	X	X	X		
Students with contract end date in 2017					X	
+ Additions						
Transfers in, new starts/enrollees, re-entries		X	X	X	X	
Transfers out/amended contract					X	
- Subtractions						
Death, military, health			X	X	X	
Non-graduating students, transfers out			X	X		
Incarceration			X	X		
Service				X		
Withdrawal				X	X	
Secondary students/training agreement				X	X	
Continuing education					X	
Transfers to another program (non-NACCAS), transfers within school, transfers to equivalent program in NACCAS accredited school					X	
Amended contract/reenrollment					X	
Audit					X	
Graduation rate						
	X	X	X	X	X	X

Job Placement Rate

One institutional accreditor assesses student placement/employment outcomes at the institutional level. NACCAS calculates the placement rate of graduates employed in their field of training. Schools submit their data by program but report the placement rate at the institutional level. Several program accreditors assess student placement/employment outcomes at the program level. These are summarized and compared to Career Bridge in Table 3 below (a detailed analysis is available in Appendix C).

Table 3: Accreditor Placement/Employment Indicators, Program Level (with Career Bridge comparison)

	Career Bridge	ABHES	ACCSC	COE	NACCAS	NEASC
Numerator						
Employed	X					X
Employed in field		X	X	X	X ⁱ	
+ Additions						
Graduates in related field		X				
Non-graduates in related field			X	X		
Continuing education, military				X		
- Subtractions						
Continuing education, not in UI	X					
Denominator						
Graduates	X	X		X	X	X
Graduates (150%)			X			
+ Additions						
Not graduated, employed in field/related field				X		
- Subtractions						
Death, health		X	X	X	X	
Incarceration		X	X	X		
Continuing education	X	X	X		X	
Military		X	X		X	
Not in UI	X					
Return to country of origin			X		X	
Service, refused employment, waiting licensure test or results				X		

Earnings of Graduates

Among the nine accreditors reviewed, only the ACCSC explicitly required information on the earnings of graduates and third-party review of employment information.

Industry of Employment

Among the nine accreditors reviewed, specific industry employment information was not collected or required for verification beyond the placement/employment metrics detailed in Table 3 above. NACCAS requires schools to report the name, address, and phone number of the employer.

Loan Indebtedness

Most accreditors collect performance data regarding institution and student outcomes associated with participation in the U.S. Department of Education’s Title IV student aid programs. These are detailed in Table 4.

Table 4: Accrator Title IV Indicators

	ABHES	ACCSC	HLC	NWCCU	MSCHE	NACCAS	NEASC
Three-year cohort default rates	X	X	X	X	X		X
Financial Responsibility Composite Score	X				X		
% of first time, full-time students with Pell grants			X		X		
Three-year loan repayment rate			X				X
Accuracy	X						
Appeal	X						
USED compliant	X						
90/10 Revenue percentages 2015, 2016, 2017	X						
Heightened Cash Monitoring with USED	X						
Letter of credit	X						
Provisional certificate	X						
Academic term			X				
Formal student refund policy			X				
# of academic programs reported in clock hours to USDE			X				
Average Pell grant aid received by these students			X				
Compliance audit					X		
Accredited by others						X	
Title IV loan or grant programs terminated by DOE						X	
Program review by DOE with determination						X	
Outstanding liabilities/unresolved findings						X	
Investigated by any state or federal agency						X	

Additional Accrator Performance Indicators

Table 5 identifies additional accreditor performance metrics that the DCSS Workgroup might consider including in its list of standard indicators for institutions or programs.

Table 5: Additional Accreditor Institution/Program Performance Indicators

Credit Accumulation	
NEASC	<ul style="list-style-type: none"> • Credit hours, undergraduate/graduate (3, 2, and 1 year prior; current; and projection)
WASC	<ul style="list-style-type: none"> • Enrolled students completed annual units (from IPEDS) • Undergraduate degree recipients completed graduation units (from IPEDS) • Units earned by non-continuing students (from IPEDS)
Institutional retention	
NEASC	<ul style="list-style-type: none"> • Retention AA and BA (from IPEDS)
NWCCU	<ul style="list-style-type: none"> • Full-time student retention rate • Part-time student retention rate • 2-year institution transfer-out rate (first time, full time)
MSCHE	<ul style="list-style-type: none"> • Full-time retention rate (IPEDS; first-time fall cohort) • Part-time retention rate (IPEDS; first-time fall cohort) • Still enrolled with 150% normal time (from IPEDS) • Transfer-out rate within 150% (from IPEDS)
WASC	<ul style="list-style-type: none"> • Non-continuing (inactive, drop out, stop out, withdrawn) students
Program Retention	
ABHES	<ul style="list-style-type: none"> • $([\text{Ending enrollment}] + [\text{Graduates}]) / ([\text{Beginning enrollment}] + [\text{New starts}] + [\text{Re-entries}])$
Program Credentialing	
ABHES	<ul style="list-style-type: none"> • $GP / (GT-GRP) = \text{Examination Pass Rate}$ <ul style="list-style-type: none"> ○ GP = Total graduates passing examination (any attempt) ○ GT = Total graduates taking examination ○ GRP = Total graduates with pending resultsⁱⁱ
ACCSC	<ul style="list-style-type: none"> • Licensure / Certification Examination Agency Rate • Number of graduates passing exam / Number of graduates taking exam
COE	<ul style="list-style-type: none"> • Licensure Exam Pass Rateⁱⁱⁱ • Graduate completers who pass licensure exam / Graduate completers who took licensure exam (have received pass/fail results)
NASSAC	<ul style="list-style-type: none"> • Sat for ALL parts of exam (YN) and passed exam (TN), for each student^{iv}
NEASC	<ul style="list-style-type: none"> • State/National Licensure Examination Passage Rates • Number who took exam / Number who pass

Table 6 shows the reporting due date and reporting period for the nine accreditors reviewed in this report.

Table 6: Annual Report Due Dates and Reporting Periods

Accreditor	Reporting Date	Reporting Period
ABHES	November	July 1-June 30
ACCSC	October	July 1-June 30
COE	December	Most recent consecutive 12-month period starting between April 1 and June 30
HLC	February-March	Fall (IPEDS) enrollment); July 1-June 30 (for degrees and certificates awarded)
MSCHE	August-September	Fall (IPEDS) enrollment; July 1-June 30 (for continuous enrollment)
NACCAS	November 30	Calendar year (January-December); based on contracted student graduation rate
NEASC	May	Fall (IPEDS) enrollment; July 1-June 30 (for continuous enrollment)
NWCCU	September	Fall (IPEDS) enrollment
WASC	May	Fall (IPEDS) enrollment; July 1-June 30 (for institutions not reporting to IPEDS)
Career Bridge	October	July 1-June 30

Appendix A: Accreditor Data Collection Variable Categories

Items in **bold text** indicate institutional and program performance indicators analyzed in Appendices B, C, and D.

Category	Sample Variables
Institutional Characteristics	<ul style="list-style-type: none"> • General information • Contact information • Ownership/control • Approval/authorization • Location(s) • Carnegie Classification • Catalog • Policies (e.g., open admission) • Degrees and programs offered
Institutional Finances	<ul style="list-style-type: none"> • Assets and Liabilities • Profit/Loss • Total Composite Financial Indicator Score • Revenue/operating revenue • Financial audit
Faculty/Staff	<ul style="list-style-type: none"> • Part/full time faculty • Faculty tenure • Faculty/student ratio • Employee headcount
Enrollment	<ul style="list-style-type: none"> • Fall enrollment, full- and part-time • 12-month unduplicated headcount • 12-month FTE • Distance education enrollment • Demographic characteristics of enrollees • Educational backgrounds of enrollees • FTE by degree type • Enrollment by first-time students (full- and part-time) • Ability to Benefit
Institution Outcomes	<ul style="list-style-type: none"> • Credit accumulation • Retention • Completions • Graduation Rate

Category	Sample Variables
Program Information	<ul style="list-style-type: none"> • Description • Tuition and fees • Credit/clock hours • Program Length • Credential awarded • Delivery method (e.g., distance education) • Enrollment • Student outcomes (on-campus and distance education) <ul style="list-style-type: none"> ○ Completion rate ○ Placement/Employment rate ○ Credentialing (pass/fail rate)
Student Characteristics	<ul style="list-style-type: none"> • Age • Ethnicity • Gender • High school/GED completion
Student Financial Aid	<ul style="list-style-type: none"> • Refund policy • Title IV Student Aid <ul style="list-style-type: none"> ○ Students receiving Title IV aid ○ Pell (status; average Pell grant) ○ Title IV loans ○ USED sanctions (e.g., heightened cash monitoring, letter of credit, etc.) • Non-Title IV Assistance (WIOA, vocational rehabilitation, state aid, institutional aid)

Appendix B: Accreditor Institution Completion, Placement, and Licensure Variables

Variables	HLC	MSCHE	NACCAS	NEASC	NWCCU	WASC
Completion						
Total degrees awarded most recent year, by seven degree types				X		
Total certificates awarded most recent year, by 3 non-degree types				X		
Total Certificates Awarded:	IPEDS					
Graduate Certificates Awarded:	IPEDS					
Undergraduate Certificates Awarded:	IPEDS					
Of the undergraduate certificates listed above, how many are NOT part of an existing degree program?	IPEDS					
Associate Degrees Awarded:	IPEDS					
Bachelor’s Degrees Awarded:	IPEDS					
Master’s Degrees Awarded:	IPEDS					
Specialist Degrees Awarded:	IPEDS					
Doctoral Degrees Awarded:	IPEDS					
Associate degree/certificate seeking (revised cohort) 150%		IPEDS				

Variables	HLC	MSCHE	NACCAS	NEASC	NWCCU	WASC
Associate degree/certificate seeking (adjusted cohort) 150%		IPEDS				
Associate degree/certificate seeking completers 150% (N)		IPEDS				
Associate degree/certificate seeking completers 150% (%)		IPEDS; will need to provide explanation if < 15% or change is < -4%				
Bachelor degree seeking (revised cohort) 150%		IPEDS				
Bachelor degree seeking (adjusted cohort) 150%		IPEDS				
Bachelor degree seeking completers 150% (N)		IPEDS				
Bachelor degree seeking completers 150% (%)		IPEDS; will need to provide explanation if < 25% or change is < -4%				
2-year institutions, grad rate of FT, first time, degree/certificate seeking undgrads with 150% of time					most recent cohort year	
2-year institutions, grad rate of FT, first time, degree/certificate seeking undgrads with 200% of time					most recent cohort year	

Variables	HLC	MSCHE	NACCAS	NEASC	NWCCU	WASC
4-year institutions, grad rate of FT, first time, degree/certificate seeking undgrads with 150% of time					most recent cohort year	IPEDS - 6-year (150%) first time, fulltime freshman grad rates by race, ethnicity and gender
Total cohort grad rate 150%		IPEDS				
Degree/certificate seeking revised cohort 200%		IPEDS				
Degree/certificate seeking adjusted cohort 200%		IPEDS				
Degree/certificate seeking completers 200%		IPEDS				
Degree/certificate seeking graduation rate 200%		IPEDS				
Graduation rate 150% by gender		IPEDS				
Graduation rate 150% by race/ethnicity		IPEDS (AIAN, Asian, Black, Hispanic/Latino, NHPI, White, 2 or more, non-resident alien, unknown)				
IPEDS graduation data (150% of time) AA and BA				X		
Graduation rate			X			
Placement						
Placement rate			X			
Licensure						
Licensure rate			X			

Appendix C: Accreditor Program Completion Variables

Variables	Career Bridge ¹⁶	ABHES	ACCSC	COE	NACCAS	NEASC
Notes	Based on three years of available data	Enrollment period Jul 1 to June 30 Not reported ¹⁷	Calculated for each student cohort starting a program in a given month/year ^v Has attendance definition ^{vi}	Reporting period – any consecutive 12-month period starting no later than April 1 and ending no later than June 30	Schools report student level data by program, but NACCAS calculates completion at the institution level	Only reported for by short term vocational program for which students are eligible for Federal Financial Aid
Numerator						
<ul style="list-style-type: none"> • Graduates • Graduates within 150% program length • Graduate completers 	Graduates	Refers to students who graduated from the program during enrollment period, including any clinical experience requirements, and are no longer at the institution	The number of students who graduated from the program within 150% of the stated program length	The number of students who have demonstrated the competencies required for a program and have been awarded the appropriate certificates, diplomas, and/or degrees upon completion ^{vii}	A student who has completed all applicable academic and non-academic requirements, as defined by the institution’s graduation policy before November 30, 2018 ^{viii}	
<ul style="list-style-type: none"> • Non-graduate completers 	m			The total number of students who left a program before graduation but have acquired sufficient competencies for employment in the field of instruction or related field <u>as evidenced by such employment</u>		

¹⁶ WSAC and DOL do not require annual outcome reporting. SBCTC requires reporting but does not share completion outcomes publicly.

¹⁷ Calculates **retention** ((Ending enrollment] + [Graduates]) / ([Beginning enrollment] + [New starts] + [Re-entries]); we used this to calculate completion.

Variables	Career Bridge ¹⁶	ABHES	ACCSC	COE	NACCAS	NEASC
<ul style="list-style-type: none"> Total completers 				[Graduate completers] + [Non-graduate completers]		
Denominator						
Starting number						
<ul style="list-style-type: none"> Beginning enrollment Number started Scheduled to graduate 		Refers to the total student population, by program, which remained from the previous reporting period and is still enrolled in the program on July 1, including students in class, on clinical experience and/or leave of absence	The number of FT and PT students who started in the program for each start date in the period, including students entering with advanced placement	The total number of students enrolled in the program on the first day of the reporting period ^{ix}	All students scheduled to graduate from their program in 2017	
Additions						
<ul style="list-style-type: none"> Transfers from another program 			The total number of students who transferred into this program from another ACCSC-approved program at the school, and whose progress in the program is concurrent with the students in this class start date		Students who transferred into the school and were scheduled to graduate in 2017	
<ul style="list-style-type: none"> Transfers to another program_1 					Students scheduled to graduate in 2017 who transferred out to a non-NACCAS accredited school	

Variables	Career Bridge ¹⁶	ABHES	ACCSC	COE	NACCAS	NEASC
<ul style="list-style-type: none"> New starts New enrollees 		Refers to any new student enrolling in the program during the enrollment period		The number of new, unduplicated enrollments for the program during the reporting period		
<ul style="list-style-type: none"> Re-entries 		Refers to any student who has left the program (i.e., terminated, voluntarily withdrawn) during a previous annual reporting period and re-enrolled during the current annual reporting period				
<ul style="list-style-type: none"> 						
<ul style="list-style-type: none"> Amended contract 					Students with amended contract end dates in 2017	

Variables	Career Bridge ¹⁸	ABHES	ACCSC	COE	NACCAS	NEASC
Subtractions						
<ul style="list-style-type: none"> Students still enrolled 				The number of students enrolled in each program on the last day of this reporting period, and continuing in their program in the following reporting period		
<ul style="list-style-type: none"> Transfers to another program Allowable subtractions Transfers to another program_2 			The total number of students who transferred out of this program and into another ACCSC-approved program at the school	Students who transferred to another program within the institution	Students scheduled to graduate in 2017 who transferred to an equivalent program at another NACCAS accredited school	
<ul style="list-style-type: none"> Transfers within school 					Students who transferred between programs within the school where 100% transfer credit is applied	
<ul style="list-style-type: none"> Amended contract/re-enrollments 					Students with amended contract end dates in 2016 or 2018 or 2019	
<ul style="list-style-type: none"> Unavailable for graduation Allowable subtractions 						

¹⁸ WSAC and DOL do not require annual outcome reporting. SBCTC requires reporting but does not share completion outcomes publicly.

Variables	Career Bridge ¹⁹	ABHES	ACCSC	COE	NACCAS	NEASC
<ul style="list-style-type: none"> Ineligible for placement 						
<ul style="list-style-type: none"> Death Incarceration Military 			X	X	X	
			X	X		
			X	Only for those students who are active national guard or military before and during program enrollment	X	
<ul style="list-style-type: none"> Service 			X	Students who left their program of study before completion to serve with a foreign aid service of the Federal government, such as the Peace Corps or to serve on an official church mission		
<ul style="list-style-type: none"> Health 			X	Including caring for ill family members	X	

¹⁹ WSAC and DOL do not require annual outcome reporting. SBCTC requires reporting but does not share completion outcomes publicly.

Variables	Career Bridge ¹⁹	ABHES	ACCSC	COE	NACCAS	NEASC
<ul style="list-style-type: none"> Withdrawal 				Students who received a 100% refund of tuition after withdrawal from the program or those who stopped attending class after the first day	Students in a program of less than one academic year (900 hours) in length who drop out within 15 calendar days of beginning classes and students in a program of one academic year (900 hours) or greater who drop out within 30 calendar days of beginning classes	
<ul style="list-style-type: none"> Secondary students/training agreement 				X	X	
<ul style="list-style-type: none"> Transfers out 					Students who transferred out to an equivalent program at another institution that is NACCAS accredited	
<ul style="list-style-type: none"> Auditing students 					X	
<ul style="list-style-type: none"> Continuing education 					Students who attended a continuing education program of 150 hours or less	
Total						

Variables	Career Bridge ¹⁹	ABHES	ACCSC	COE	NACCAS	NEASC
<ul style="list-style-type: none"> Available for graduation Cumulative enrollment Placement cohort 	All those who exited the program whether or not they graduated	[Beginning enrollment] + [New starts] + [Re-entries]	[Number started] + [Transfers from another program] – [Transfers to another program] – [Unavailable for graduation]	[Beginning enrollment] + [New enrollees] – [Allowable subtractions] – [Students still enrolled]	([Scheduled to graduate] + [Transfers from another program] + [Transfers to another program_1] + [Amended contract]) – ([Transfers to another program_2] – [Transfers within school] – [Amended contract/reenrollment] – [Ineligible for placement])	
Calculation						
<ul style="list-style-type: none"> Graduation rate Total completion rate 	[Graduates] \ [Available for graduation]	[Graduates] / [Cumulative enrollment]	[Graduates within 150% of program length] / [Available for graduation]	Graduation rate: (([Graduate completers] / ([Cumulative enrollment]) * 100 Total completion rate: (([Total completers] / [Cumulative enrollment]) * 100 ^x	[Graduates] \ [Placement cohort]	Annual weighted average

Appendix D: Accreditor Program Placement/Employment Variables

	Career Bridge ²⁰	ABHES	ACCSC	COE	NACCAS	NEASC
Notes	Based on three years of available data	Reporting period: July 1 to June 30	Calculated for each student cohort starting a program in a given month/year		Schools report student level data by program, but NACCAS calculates placement at the institution level	
Numerator						

²⁰ SBCTC provides placement, wage and earnings data on students who exited a program, whether they completed or not, and were employed in a job covered by unemployment insurance (UI) three quarters after exiting college. WSAC and DOL do not require annual outcome reporting.

	Career Bridge ²⁰	ABHES	ACCSC	COE	NACCAS	NEASC
Starting number						
<ul style="list-style-type: none"> Employed/With job Graduates employed in field Graduates placed in their field of training Employed in field of instruction pursued 	Program completers who obtained employment in the third quarter after they completed (7–9 months later)	Refers to graduates gaining employment in the field for which the student was specifically trained ^{xi}	The number of graduates employed in jobs for which the program trained them ^{xii}	Graduates employed in field of instruction pursued	Graduates employed in a field for which their training prepared them (i.e., in a position within the beauty and wellness industry that directly relates to their field of training) after graduation and prior to November 30, 2018 ^{xiii}	Number with job
Additions						
<ul style="list-style-type: none"> Graduates placed in a related field of training 		Refers to a position wherein the majority of the graduate’s job functions require the use of skills and knowledge acquired through successful completion of the training program ^{xiv}				
<ul style="list-style-type: none"> Non-graduate completers employed in positions related to field of instruction 				Non-graduate completers employed in positions related to field of instruction		
<ul style="list-style-type: none"> Non-graduated students who obtained training related employment 			The number of withdrawn/terminated students who obtain employment in a field related to the program in which the student			

	Career Bridge ²⁰	ABHES	ACCSC	COE	NACCAS	NEASC
			was enrolled and based upon the training provided by the school			
• Continuing education				X		
• In military				X		
Subtractions						
• Continuing education	Postsecondary enrollment					
• Not in Unemployment Insurance	Self-employed, working in religious institution, or USPS					
Numerator Total						
<ul style="list-style-type: none"> • Employed Completers • Graduates available for employment • Graduates available for employment_2 • Graduated completers employed in positions related to field of instruction • Total completers employed in positions related to field of instruction 	[Employed]— [Continuing education]—[Not in Unemployment Insurance]	[Graduates placed in their field of training] + [Graduates placed in a related field of training]	[Graduates employed in field] + [Non-graduated students who obtained training related employment]	Graduate completers employed in positions related to field of instruction: [Employed in field of instruction pursued] + [In military] + [Continuing education]		
				Total completers employed in positions related to field of instruction: [Employed in field of instruction pursued] + [In military] + [Continuing education] + [Non-graduate completers employed in positions related to field of instruction]		
Denominator						

	Career Bridge ²⁰	ABHES	ACCSC	COE	NACCAS	NEASC
<ul style="list-style-type: none"> • Program completers • Total graduates • Number of grads • Graduate completers • Total completers • Graduates within 150% of program length • Placement cohort 	Program completers	Any student who has met all completion requirements and has received their diploma, certificate, or degree during the enrollment period	The number of students who graduated from the program within 150% of the stated program length	The number of students who have demonstrated the competencies required for a program and have been awarded the appropriate certificates, diplomas, and/or degrees upon completion	Placement cohort (from completion)	Number of graduates
Additions						
<ul style="list-style-type: none"> • Non-graduate completers 				The total number of students who left a program before graduation but have acquired sufficient competencies for employment in the field of instruction or related field as evidence by such employment		

	Career Bridge ²¹	ABHES	ACCSC	COE	NACCAS	NEASC
Subtractions						
<ul style="list-style-type: none"> • Graduates unavailable for placement • Graduates unavailable for employment • Graduate completers unavailable for employment • Ineligible for placement 						
<ul style="list-style-type: none"> • Death 		X	X	X	X	
<ul style="list-style-type: none"> • Incarceration 		X	X	X		
<ul style="list-style-type: none"> • Military 		X	X		X	
<ul style="list-style-type: none"> • Service 				Students volunteering with a foreign aid service of the Federal government, such as the Peace Corps or who are participating on an official church mission		
<ul style="list-style-type: none"> • Health 		X	X	Including caring for ill family members	X	

²¹ SBCTC provides placement, wage and earnings data on students who exited a program, whether they completed or not, and were employed in a job covered by unemployment insurance (UI) three quarters after exiting college. WSAC and DOL do not require annual outcome reporting.

	Career Bridge ²²	ABHES	ACCSC	COE	NACCAS	NEASC
<ul style="list-style-type: none"> Continuing education 	Postsecondary enrollment	X	The number of graduates that continue on with education in an accredited institution of higher education (postsecondary) on at least a half-time basis		The graduate continued his/her education at an institution under the same ownership (e.g., a graduate of your program subsequently enrolled in the instructor program of an institution under the same ownership)	
<ul style="list-style-type: none"> Not in Unemployment Insurance 	Self-employed, working in religious institution, or USPS					
<ul style="list-style-type: none"> Return to country of origin 			International students who have returned to their country of origin		The graduate studied under a student visa and is ineligible for employment in the U.S.	
<ul style="list-style-type: none"> Refused employment 				The number of graduate completers for whom the institution has documented evidence that the completers failed to keep interview appointments, enrolled in the program of instruction strictly for personal use, or simply refused an employment offer in the field of instruction		

²² SBCTC provides placement, wage and earnings data on students who exited a program, whether they completed or not, and were employed in a job covered by unemployment insurance (UI) three quarters after exiting college. WSAC and DOL do not require annual outcome reporting.

	Career Bridge	ABHES	ACCSC	COE	NACCAS	NEASC
<ul style="list-style-type: none"> Waiting to take licensure exam or awaiting results 				The number of graduates who have completed their programs of instruction and are waiting to take a state- or federally-administered licensure exam PLUS those graduates who took an exam and are still waiting for pass/fail results at the end of reporting period. Exclude completers waiting to take a licensure exam or awaiting results if they are already employed in a position related to the field of instruction.		
Denominator Total						
<ul style="list-style-type: none"> Total Available for employment Graduate completers_2 Total completers Placement cohort_2 	[Program completers] – [Continuing education] – [Not in Unemployment Insurance]	[Total graduates] – [Graduates unavailable for placement]	[Graduates within 150% of program length] – [Graduates unavailable for employment]	Graduate completers_2: [Graduate completers] – [Graduate completers unavailable for employment] Total Completers: [Graduate completers] + [Non-graduate completers] – [Graduate completers unavailable for employment]	[Placement cohort] – [Ineligible for placement]	
Calculation	Career Bridge	ABHES	ACCSC	COE	NACCAS	NEASC

<ul style="list-style-type: none"> • Placement percentage • Employment rate • Graduation placement rate • Total placement rate • Employment rate with non-graduated students who obtained training related employment 	<p>[Employed completers] / [Total completers]</p>	<p>[Graduates available for employment] / [Total]^{xv}</p>	<p>Employment rate: [Graduates employed in field] / [Available for employment]</p> <p>Employment rate with non-graduated students who obtained training related employment: [Graduates available for employment_2] / [Available for employment]</p>	<p>Graduate placement rate: [Graduate completers employed in positions related to field of instruction] / [Graduated completers_2] * 100</p> <p>Total placement rate: [Total completers employed in positions related to field of instruction] / [Total completers] * 100^{xvi}</p>	<p>[Graduates employed in field] / [Placement cohort_2]</p>	<p>[With jobs] / [Number of grads] (must indicate of program is subject to “gainful employment” requirements and provide location of gainful employment report)</p>
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Appendix E: IPEDS Survey Components²³

The completion of all IPEDS surveys, in a timely and accurate manner, is mandatory for all institutions that participate in or are applicants for participation in any Federal financial assistance program authorized by Title IV of the Higher Education Act (HEA) of 1965, as amended. The completion of the surveys is mandated by 20 USC 1094, Section 487(a)(17) and 34 CFR 668.14(b)(19).

Component	Description
12-month Enrollment	Unduplicated headcount of students enrolled over a 12-month period. Includes: headcounts by student level, race/ethnicity, and gender; instructional activities (total hours students engaged in instruction); FTE equivalent enrollment.
Academic Libraries	Information on collections, services, and expenditures at libraries at degree-granting institutions. Institutions with annual library expenditures less than \$100,000 are only required to report collections, circulations, and services information.
Admissions	Basic information is collected from institutions that do not have an open admissions policy on the undergraduate selection process for first-time, degree/certificate-seeking students. Data collected include admissions considerations, acceptance rates, admission yields, and SAT/ACT test scores.
Completions	Number of students who complete a postsecondary education program (completers) and the number of postsecondary awards earned (completions). Data collected include: completions by field of study, award level, recipient race/ethnicity and gender; completers by race/ethnicity, gender, and age (total and award level); and whether programs are offered via distance education.
Fall Enrollment	Measure of student access to higher education at traditional institutions. Data are collected for all students enrolled in credit-bearing courses/programs which could potentially lead to awards ranging from postsecondary certificates of less than 1 year to doctoral degrees. Data collected include: full- and part-time students enrolled in the fall by level, race/ethnicity, and gender; residence and high-school graduation status of first-time undergraduate students; age of students; first-time retention rates; student-to-faculty ratio; and students enrolled in distance education. In even-numbered years, four-year institutions are also required to provide enrollment data by level, race/ethnicity, and gender for 9 selected fields of study for the Office for Civil Rights.
Finance	Provides context for understanding the resources and costs of providing postsecondary education and its contribution to the gross national product. IPEDS collects finance data conforming to the accounting standards that govern public and private institutions. Generally, private institutions use standards established by the Financial Accounting Standards Board (FASB) and public institutions use standards established by the Governmental Accounting Standards Board (GASB). Data collected include: Revenues by source (e.g., tuition and fees, government grants and contracts, private gifts); expenses by function (instruction, research, academic support, and institutional support); assets and liabilities; and scholarships and fellowships.
Graduation Rates	Graduation rate data provide information on institutional productivity and help institutions comply with reporting requirements of the Student Right-to-Know Act (1990) and the Higher Education Act, amended (2008). Graduation rates data are collected for full-time, first-time degree and certificate-seeking undergraduate students. Data collected include: number of students entering the institution as full-time, first-time degree or certificate-seeking students in a particular year (cohort), by race/ethnicity and gender; number of students completing program within a time period equal to one and a half times (150%) the normal period of time, by race/ethnicity, gender, and Pell status; and number of students who transferred to another institution.
Graduation Rates 200%	Graduation rate data provide information on institutional productivity and help institutions comply with reporting requirements of the Student Right-to-Know Act (1990) and the Higher Education Act, amended (2008). Graduation rates data are collected for full-time, first-time degree and certificate-seeking undergraduate students. Data collected include: number of students entering the institution as full-time,

²³ U.S. Department of Education, National Center for Education Statistics, IPEDS Survey Components

Component	Description
	first-time degree or certificate-seeking students in a particular year (cohort), by race/ethnicity and gender; and number of students completing their program within a time period equal to two times (200%) the normal period of time.
Human Resources	Measures the number and type of staff supporting postsecondary education. Because staffing patterns vary greatly across postsecondary institutions, IPEDS uses the Standard Occupational Classification (SOC) System to collect occupational activity. Data collected include: employees by primary occupational activity, faculty status, and full- and part-time status; full-time instructional staff by academic rank, gender, and contract length/teaching period; and full-time instructional faculty by rank, gender, and length of contract/teaching period and their salary outlays.
Institutional Characteristics	Institutional characteristics are collected through two survey components: Institutional Characteristics Header and Institutional Characteristics. Data collected include: basic institutional contact information; student services information; tuition/fees and other student charges; control or affiliation; type of calendar system; and levels of awards and types of programs offered.
Outcome Measures	Degree-granting institutions report the outcomes of degree/certificate-seeking undergraduate students who are not only first-time, full-time students, but also part-time attending and non-first-time (transfer-in) students. The award status is measured at specific points in times. For students that did not receive an award after 8 years, the enrollment status is reported.
Student Financial Aid	Collects the count of students awarded different types of financial aid or military education benefits and the total amounts of aid awarded. The average dollar amount of aid awarded is then calculated. As required by the Higher Education Act (1965), as amended, IPEDS also collects data to calculate average net price at each institution for two groups of undergraduates: those awarded grant aid and those awarded Title IV federal aid. Data collected include; counts of undergraduate students awarded aid and amounts of aid; counts of full-time, first-time undergraduate students awarded aid and amounts of aid; and counts of undergraduate and graduate students receiving military education benefits.

ⁱ Asks for employer name, address, and phone number.

ⁱⁱ If the credentialing or licensure rate in one or more program falls below 70% for the reporting period, the institution will be required to submit an action plan as part of its annual report. The action plan section will appear automatically for each outcome reported below 70%.

ⁱⁱⁱ Benchmark is 70%.

^{iv} Benchmark is 70 percent.

^v The reporting period used to complete the Graduation and Employment Chart is determined by taking the program’s normal length of completion (including vacations and holidays rounded to the nearest whole number) in months multiplied by 150 percent and adding three (3) months for employment. From the Report Date of July 2018, we count back the number of months (program length in months x 150% + 3 months) to establish the Ending Date of a reporting period. From the Ending Date, we count back an additional twelve (12) months to determine the Beginning Date of the reporting period.

To convert the program length in weeks to months, divide the number of weeks (including holidays and breaks) by 4.34 and round up to the nearest whole number. Use the actual amount of time a student must commit to a program to receive his or her credential. The actual program length is the amount of time a student is committed to a course of study, including breaks, holidays, and variations of schedule. A school's catalog may show the "academic instructional length" (weeks) and the "actual program length" in either weeks or months. The actual program length is a clear indicator to the student of the total amount of time they will have to commit to successfully complete their program. The Commission uses the actual program length when calculating Graduation and Employment Chart cohort reporting timeframes. It is to the advantage of the school to use the actual program length (months) versus the academic instructional time (weeks) when calculating reporting timeframes.

^{vi} Students are considered to have been in attendance for reporting purposes (Start) if, as a result of their attendance, they incur a tuition/fee or other financial obligation as specified by the institution’s refund policy.

Fees or other obligations (i.e., uniforms, tools, etc.) are only those associated with actual attendance; not those considered part of the application for admission or enrollment process. In any event, any student enrolled 15 days from the scheduled start date of the program must be classified as a “start” for the purpose of reporting students on the Graduation and Employment Chart.

vii [Graduates who (1) are employed in the field of instruction pursued, (2) have entered the military, or (3) are continuing their education] + ([The number of students who have demonstrated the competencies required for a program and have been awarded the appropriate certificates, diplomas, and/or degrees upon completion.] – ([Graduate Completers Waiting To Take Licensure Exam PLUS Graduate Completers who are Awaiting Results: The number of graduates who have completed their programs of instruction and are waiting to take a state- or federally-administered licensure exam PLUS those graduates who took an exam and are still waiting for pass/fail results at the end of reporting period*. (A licensure examination program is a program of instruction where the graduate must pass a licensure examination in order to become employed in the field of instruction pursued. The term ‘certification’ is used by the Council to describe an optional credential a student may obtain to demonstrate competency in a specialized field of work.) TIP: *If any completer waiting to take a licensure exam or awaiting results is already employed in a position related to the field of instruction, DO NOT include them in this row.] + [The number of graduate completers documented to be unavailable for employment because of situations such as pregnancy, other serious health-related issues (physical/mental/behavioral), caring for ill family members, incarceration, death, etc. ALSO, graduate completers who, instead of securing traditional employment, are volunteering with a foreign aid service of the Federal government, such as the Peace Corps, or who are participating on an official church mission.] + [The number of graduate completers for whom the institution has documented evidence that the completers failed to keep interview appointments, enrolled in the program of instruction strictly for personal use, or simply refused an employment offer in the field of instruction.])

viii The scheduled graduation date is a student’s most recent contract end date (i.e., the contract end date after all leaves of absence, schedule changes, re-enrollments and other contract changes have been accounted for). Students that graduated in 2016, 2017, or 2018 are included. Benchmark is 50 percent.

ix Students continuing enrollment in their programs from the prior Annual Report reporting period. (This number should be the same number from the prior reporting period–Students Still Enrolled.)(The number of students enrolled in a program on the first day of the reporting year means the number of students enrolled in each program on the last day of the previous reporting year AND remained in school on the first day of the current reporting year.)

x Benchmark is 60 percent.

xi For any graduate categorized as self-employed, the institution must have on file additional documentation and rationale to justify the placement and the institution may be requested to submit additional documentation to support that job title.

xii NOTE: Graduates classified as employed must be supported by documentation showing position obtained, date employed, employer, and employer contact person, address, and phone.

xiii Graduates who obtain temporary positions (i.e., positions where there is an expectation prior to the graduate’s hire that the employment relationship between the employer and graduate will not last more than one month) are not considered placed. Benchmark is 60 percent.

^{xiv} For any graduate categorized as placed in a related field, the institution must have on file additional documentation and rationale to justify the placement and the institution may be requested to submit additional documentation to support that job title.

^{xv} If < 70 percent, institution must submit an action plan.

^{xvi} Benchmark is 70 percent.