

**2018 CAPFAA Conference**  
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# Gainful Employment: A High level Overview

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# Agenda



# What is Gainful Employment

- Created to protect students from poor career training programs.
- An educational program must lead to a degree at a non-profit or public institution or it must prepare students for "gainful employment in a recognized occupation."
- Therefore, with very few exceptions, any non-degree program offered by non-profit or public institutions and all educational programs offered at for-profit institutions must lead to gainful employment.

# Institutional Responsibility:

## The five Pieces of Gainful Employment Administration

Federal and State Department of Education Approval

Annual/Routine Reporting

Gainful Employment Disclosures

The Completers List

Debt-to-Earnings Rates

# Institutional Responsibility

- Must certify that all gainful employment programs meet applicable accreditation requirements and state or federal licensure standards.
- Ensure programs pass metrics to continue eligibility in the student financial aid program, and the default rate for former students does not exceed 30 percent.
- Must publicly disclose information about the program costs, debt, and performance of their gainful employment programs so that students can make informed decisions.

# Institutional Responsibility

- Approved programs must be listed on an institutions E-App. Eligible non-degree programs are specifically named on the ECAR—the *Eligibility and Certification Approval Report*.

**Application for Non-Degree Programs to be considered for Title IV Aid**

PROGRAM INFORMATION	
Program Name	Type of Program <input type="checkbox"/> Preparatory: Preparatory coursework necessary for enrollment in a Title IV eligible program or degree
School/College	<input type="checkbox"/> Post-Baccalaureate: Undergraduate coursework resulting in a certificate (pre-requisite is a Bachelor degree)
Program Contact Name, Phone Number, Email	<input type="checkbox"/> Graduate Certificate: Graduate coursework resulting in a certificate (pre-requisite is a Bachelor degree) <input type="checkbox"/> Graduate Certificate Post-Master's: Graduate coursework resulting in a certificate (pre-requisite is a Master's degree) <input type="checkbox"/> Sixth Year Certificate: Graduate coursework resulting in a certificate (pre-requisite is a Master degree)
Anticipated Start Date	
Program Website	

PROGRAM ACADEMIC STRUCTURE	
Length of Program (semesters)	How many credit hours are required for completion?
Which semester can a student begin the program? <input type="checkbox"/> Fall <input type="checkbox"/> Spring <input type="checkbox"/> Summer	Does the program include an internship/clinical/externship? <input type="checkbox"/> Yes <input type="checkbox"/> No
Based on the program's course schedule, what is the projected enrollment status by semester for students? <input type="checkbox"/> Fall _____ <input type="checkbox"/> Spring _____ <input type="checkbox"/> Summer _____	If yes, does the internship/clinical/externship fall within a normally scheduled semester? <input type="checkbox"/> Yes <input type="checkbox"/> No

CHECKLIST FOR REQUIRED ITEMS	
PLEASE INCLUDE THE ITEMS BELOW WITH THE APPLICATION	
<input type="checkbox"/> Proof that program is listed on the <a href="#">CT Office of Higher Education's website</a>	<input type="checkbox"/> <a href="#">Gainful Employment Disclosure</a> uploaded to program website (This item is not required for Preparatory Programs)
<input type="checkbox"/> Accreditation Approval from the New England Association of Schools and Colleges (NEASC)	<input type="checkbox"/> Narrative description on how the University determined the need for the program. For example, describe what employment need this program will address and how the University became aware of this need.
<input type="checkbox"/> Programmatic Accreditation Approval, if applicable	<input type="checkbox"/> Narrative description of how the program was designed to meet local market needs, or for an online program, regional or national market needs.
<input type="checkbox"/> The recognized occupation identified by the <a href="#">Standard Occupational Classification (SOC) code</a>	<input type="checkbox"/> Narrative description of any wage analysis the institution may have performed, including any consideration of Bureau of Labor Statistics wage data related to the new program.
<input type="checkbox"/> <a href="#">Classification of Instructional Programs (CIP) Code</a> with supporting documentation	<input type="checkbox"/> Narrative description of how the program was reviewed or approved by, or developed in conjunction with, one of more of the following: business advisory committees, program integrity boards, regulatory agencies, businesses that would likely employ graduates of the program.

**AGREEMENT**

- Pursuant to [34 CFR 668.4](#), the Department agrees to adhere to all Gainful Employment(GE) disclosure requirements and will update the Gainful Employment Disclosure annually prior to January 31<sup>st</sup>, as well as provide a link to the disclosure on all websites and marketing materials related to the program. The Department must disclose certain information about each of its GE programs to prospective students before the student signs an enrollment agreement, completes registration or makes any financial commitment to the University:
  - The occupations that the program prepares students to enter (by occupation name and Standard Occupational Classification (SOC) code);
  - The program length (the normal time to complete the program);
  - The on-time graduation rate for students completing the program, with in the reporting period and within the programs normal time;
  - The tuition and fees the school charges a student for completing the program within normal time, the cost of room and board if applicable, and the typical costs for books and supplies (unless those costs are included as part of tuition and fees);
  - The job placement rate for students completing the program (if applicable);
  - The median loan debt incurred by students who completed the program (separately by FSA loans, private educational loans, and institutional financing plans,); and
  - Other information as required by the Department of Education (DOE).
- The Department agrees to retain, for review and submission to the DOE upon request, copies of the meeting minutes, all correspondence, proposals, or other documentation to support the development, review, compliance and/or approval of the program.

**SIGNATURES**

Signature	Signature
Name and Title	Name and Title
Date	Date

**OFFICE OF STUDENT FINANCIAL SERVICES (INTERNAL USE ONLY)**

Program has been:	
<input type="checkbox"/> Approved	
<input type="checkbox"/> Denied	Reason:
<input type="checkbox"/> Additional information is required	Reason:
Signature	
Name and Title	
Date	



# The Process: Data Collection

- Award Year
- Student Social Security Number
- Student First Name
- Student Middle Name
- Student Last Name
- Student Date of Birth
- Institution Code
- Institution Name
- Program Name
- CIP Code
- Credential Level
- Medical or Dental
- Internship or Residency
- Program Attendance Begin Date
- Program Attendance Begin Date for This Award Year
- Program Attendance Status During Award Year
- Program Attendance Status Date
- Private Loans Amount
- Institutional Debt
- Tuition and Fees Amount
- Allowance for Books, Supplies, and Equipment
- Length of GE Program
- Length of GE Program Measurement
- Student's Enrollment Status as of the 1st Day of Enrollment in Program

# The Process: Data Collection

- Deans/program directors send a roster of students in their respective programs as of 06/30 of the given year.
- Rosters include the following information:
  - Name
  - PSID
  - Status of student as of 06/30/xx
  - Enrollment status
  - Admit Term

# The Process: Disclosure Templates

- Each year institutions are required to post updated disclosure templates for each Gainful Employment program by January 1<sup>st</sup>.

**University of Connecticut**  
Graduate certificate in Certificate Program in Long-Term Health Care Management  
Program Length: 9 months

**Students graduating on time**  
N/A\* of Title IV students complete the program within 9 months<sup>1</sup>  
\*Fewer than 10 students enrolled in this program. This number has been withheld to preserve the confidentiality of the students.

**Program Costs\***  
\$7,485 for in-state tuition and fees  
\$7,648 for out-of-state tuition and fees  
\$450 for books and supplies  
\$15,938 for off-campus room and board  
Other Costs:  
No other costs provided.  
Visit website for more program cost information:  
[healthcare.business.uconn.edu/long-term-health-care-management/certificate/](http://healthcare.business.uconn.edu/long-term-health-care-management/certificate/)  
\*The amounts shown above include costs for the entire program, assuming normal time to completion.  
Note that this information is subject to change.

**Students Borrowing Money**  
8% of students who attend this program borrow money to pay for it<sup>2</sup>  
**The typical graduate leaves with**  
N/A<sup>3</sup> in debt<sup>3</sup>  
\*Fewer than 10 students completed this program within normal time. This number has been withheld to preserve the confidentiality of the students.  
**The typical monthly loan payment**  
N/A<sup>4</sup> per month in student loans with N/A<sup>4</sup> interest rate<sup>4</sup>  
\*Fewer than 10 students completed this program within normal time. This number has been withheld to preserve the confidentiality of the students.  
**The typical graduate earns**  
not provided per year after leaving this program<sup>5</sup>

**Graduates who got jobs**  
N/A<sup>6</sup> of program graduates got jobs  
\*We are not currently required to calculate a job placement rate for program completers.  
**Program graduates are employed in the following fields:**  
Medical and Health Services Managers: <http://onstonline.org/link/summary/11-9111-00>

**Licensure Requirements<sup>5</sup>**  
This program meets licensure requirements in Connecticut<sup>5</sup>  
\*State requires students to sit for licensure EXAM

**Additional Information:**  
Length of time needed for program completion depends upon the number of hours internship is conducted each week. The internship is 500 hours in total.  
Date Created: 5/12/2017  
These disclosures are required by the U.S. Department of Education.

**Footnotes:**  
<sup>1</sup> The share of students who completed the program within 100% of normal time (9 months).  
<sup>2</sup> The share of students who borrowed Federal, private, and/or institutional loans to help pay for college.  
<sup>3</sup> The median debt of borrowers who completed this program. This debt includes federal, private, and institutional loans.  
<sup>4</sup> The median monthly loan payment for students who completed this program if it were repaid over ten years at a 5% interest rate.  
<sup>5</sup> The median earnings of program graduates who received Federal aid.  
<sup>6</sup> Some States require students to graduate from a state approved program in order to obtain a license to practice a profession in those States.  
<sup>7</sup> State Job Placement Rate: N/A.  
<sup>8</sup> Assessor Job Placement Rate: N/A.

# The Process: Disclosure Templates

As of July 1, 2019 institutions will need to comply with requirements (34 CFR 668.412 (d) and (e) ) that require institutions to:

- Include the disclosure template, or a link thereto, in their GE program promotional materials;

And

- Directly distribute the disclosure template to prospective students.

# The Process: Disclosure Templates

- When students apply for an eligible certificate program, the Admissions application will generate an email containing the required disclosure.
- When a student is offered admission, they will be prompted to log into the admissions portal to accept the offer of admission.
- Prior to accepting, the student must acknowledge, by checking a box, they that received and reviewed the applicable disclosure statement.

# The Process: The Completers List

- A list of all students who completed an eligible certificate program within the allotted time.
- These students were previously reported via annual reporting that took place by October 1 of the prior year.
- Institutions have 45 days to review and submit a completers list, if changes are necessary.

# The Process: Debt to Earning Rates

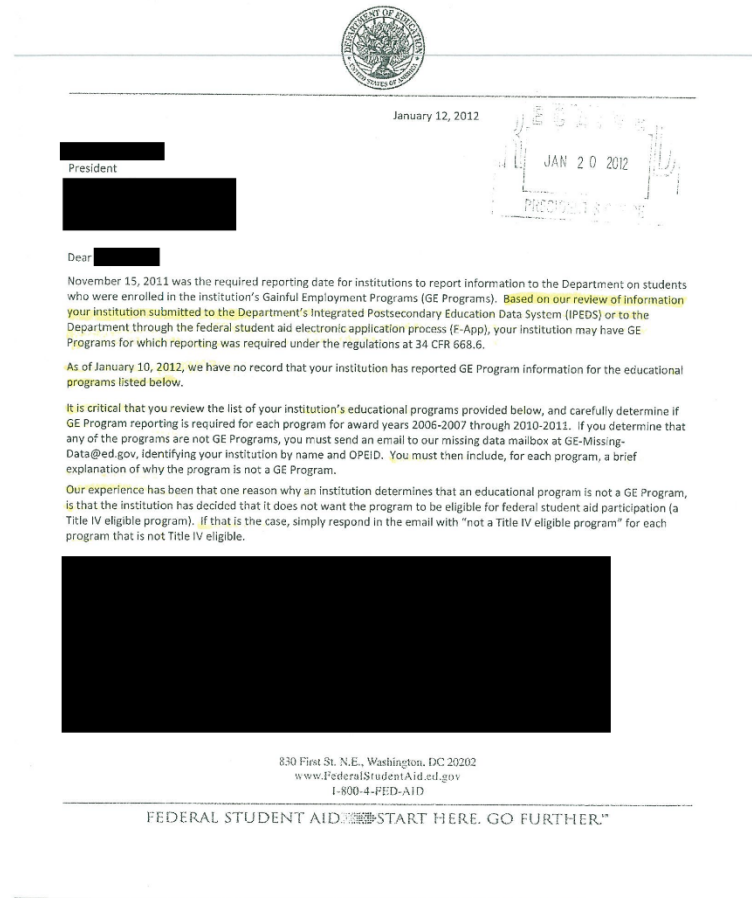
- Institutions may challenge the data that resulted in certain Debt-to-Earnings (D/E) rates, but may not challenge the actual calculation.
- A Few reasons D/E rates can be challenged are as follows:
  - Loan does not belong to the student or institution
  - Incorrect loan period dates
  - Loan Debt is incorrect (“Loan Amount” less the sum of the “Loan Cancellation Amount” and the “Loan Refund Amount”).

# Consequences

<b>Accountability</b>	
<b>Certifications:</b> Institutions must certify that each of their gainful employment programs meet state and federal licensure, certification, and accreditation requirements.	
<b>Metric:</b> To maintain title IV eligibility, gainful employment programs will be required to meet minimum standards for the debt vs earnings of their graduates.	
<b>Pass</b>	Programs whose graduates have annual loan payments less than 8% of total earnings <u>OR</u> less than 20% of discretionary earnings.
<b>Zone</b>	Programs whose graduates have annual loan payments between 8% and 12% of total earnings <u>OR</u> between 20% and 30% of discretionary earnings.
<b>Fail</b>	Programs whose graduates have annual loan payments greater than 12% of total earnings <u>AND</u> greater than 30% of discretionary earnings.
<b>Ineligible</b>	Programs that fail in 2 out of any 3 consecutive years <u>OR</u> are in the zone for 4 consecutive years.



# Consequences



# Best Practices

- Data Accuracy
- CIP code changes
- Program Name Changes
- Data field definitions

# Regulatory Update

- Ed announced that new regulations for Gainful Employment and Borrower defense would be announced on November 1, 2018
- As of October, Ed announced a delay in those new rules citing a large volume of comments received (38,000).



You made it!

