

President's Staff Presentation 23-Nov-15

- **BOT Student Complaint Process—**

Background—As part of the Program Integrity legislation of 2010, states are required to have state complaint process.

This requirement is now a focus of the U.S. Department of Education (ED). Institutions are required to request approval for non-degree (certificate programs) which once approved are part of the institution's contract with ED. With this current focus on having the state complaint process in place, institution's approval requests are being held pending proof of the existence of the state complaint process. Example: 07-Apr-15, Barton requested approval of the Mental Health Technician certificate. Barton did not receive notification of approval until 16-Nov-15. During the interim, there was discussion between the state of Kansas officials and ED regarding the requirement of the state complaint process.

Resolution—In working with ED, state of Kansas officials were able to explain the state educational authorities and their governance and determine a format that would satisfy ED. On 13-Nov-15, guidance regarding this issue was provided to Kansas community colleges by Linda Fund, representing KACCT. The guidance included recommendations for creating institutional BOT complaint processes. A draft BOT Student Complaint Process document following the provided recommendations has been prepared for your consideration.

- **Barton Financial Losses--**

Beginning for 14-15, Dr. Heilman requested tracking of financial losses due to institutional responsibility. Below is a summary of the financial losses recorded for 14-15.

Reason	Number of Students	Dollar Total
Lack of classes offered in a program; paid scholarship to student to take a class at another school since it was her last semester.	1	336.56
Classes not needed for student's program*	2	2149.00
Student earned a degree/not switched to NDS	1	1718.00
Incorrect enrollment between Banner and eCollege	2	409.00
Instructor did not line student off cert roster	1	717.00
Transcript issue – student had not graduated from high school	2	9791.00
FA freeze date issue	1	475.00
	Total for 14-15--	\$15,595.56
	Total for 13-14--	\$28,097.00
	Decrease --	-\$12,501.44

*Monitoring to ensure students are paid federal aid for only classes needed for their program of study is a serious issue and is one in which Program Reviews by ED are focused upon.

In addition, we are reporting financial losses due to Return to Title IV recalculations. These are students who withdrew or “stopped out” after receiving T4 aid. These are treated as accounts receivable.

R2T4 Returns (Aid Year)	Number of Students	Dollar Total
2013-14	33	\$38,334.00
2014-15	36	\$37,604.00

- **Incentive Compensation and Faculty Advising/Recruiting--**

As part of the Program Integrity legislation of 2010, the prohibition on incentive compensation was reinforced with the elimination of “safe harbours”.

“Under the incentive compensation prohibition, postsecondary educational institutions that participate in the student financial assistance programs authorized pursuant to Title IV of the HEA, 20 U.S.C. §§ 1070 et seq. (Title IV programs), are barred from providing incentive payments to any person or entity engaged in any student recruiting or admissions activities or in making decisions regarding the award of student financial assistance based directly or indirectly upon success in securing enrollments or financial aid.”

02-Jun-15 – ED announced stricter penalties regarding incentive compensation violations.

Penalties to include: Returning all federal aid to ED for enrollments secured as a result of incentive compensation, a separate fine imposed on the institution, and suspension of an institution’s eligibility to participate in Title IV aid.

<http://www.ifap.ed.gov/eannouncements/attachments/061015EnforcementProhibitionOnIncentiveCompPayAttachment.pdf>

<http://www.gao.gov/new.items/d10370r.pdf>