

Implementing the Higher Education Opportunity Act – A Checklist for Business Officers			
Summary of New Requirements	Federal Compliance Date	References	Departments Impacted
COLLEGE COST AND MISCELLANEOUS PROVISIONS			
<p>College Costs</p> <ul style="list-style-type: none"> <input type="checkbox"/> Become familiar with provisions for the publication of college cost watch lists and new, standard net price calculation <input type="checkbox"/> Prepare to provide net price data for students receiving federal aid, disaggregated by five specified income levels <input type="checkbox"/> Develop net price calculator and post on institution’s Web site <ul style="list-style-type: none"> o ED is to develop a net price calculator and make it available to institutions by August 14, 2009 (see http://npc.inovas.net/institution/ for ED’s template) o Institutions may choose to use ED’s calculator or post their own within two years of when ED makes its calculator available 	<p>July 1, 2011 Watch lists to be published by ED</p> <p>by October 2011 institution to post calculator (extended to Oct 2011 due to ED’s late provision of template)</p>	<p>HEA Sec. 132 HEOA Sec. 111</p>	<p>Admissions</p> <p>Budget Office</p> <p>Financial Aid</p> <p>Public Information/Relations</p>
<p>Textbook Cost Containment</p> <ul style="list-style-type: none"> <input type="checkbox"/> Educate faculty on textbook information that will be made available by publishers, new requirements <input type="checkbox"/> Develop system to collect required information from faculty about textbooks (ISBN, cost) and share with bookstore <input type="checkbox"/> Publish information on required textbooks and supplemental materials in course schedules by July 1, 2010 	<p>July 1, 2010</p>	<p>HEA Sec. 133 HEOA Sec. 112</p> <p>No regulations will be promulgated</p>	<p>Finance and Administration</p> <p>Bookstore</p> <p>Provost</p> <p>Registrar</p>
<p>Transfer-of-Credit Policy / Articulation Agreements</p> <ul style="list-style-type: none"> <input type="checkbox"/> Develop or review transfer-of-credit policy, and publish it on the institution's Web site <ul style="list-style-type: none"> o Include criteria for transfer of credit earned at another institution o ED will provide link to transfer-of-credit policy from College Navigator Web site <input type="checkbox"/> Include a listing of institutions with which you have articulation agreements in student disclosures 	<p>August 14, 2008</p>	<p>HEA 485(f) HEOA 488(e)</p>	<p>Provost</p> <p>Registrar</p>

<p>Lobbying</p> <ul style="list-style-type: none"> <input type="checkbox"/> Establish procedures and policies to demonstrate that no HEA funds have been used in attempting to influence federal officials, including matters related to grants, contracts, loans, etc. <input type="checkbox"/> Note that no federal grant or contract funds can be used for lobbying (Byrd Amendment) 	<p>August 14, 2008</p>	<p>HEOA Sec. 119</p>	<p>Government Relations Legal Affairs</p>
<p>Peer-to-Peer File Sharing</p> <ul style="list-style-type: none"> <input type="checkbox"/> Develop a written plan to combat illegal file sharing <ul style="list-style-type: none"> o Must use one or more technology-based deterrents o Education of students o Procedures to review effectiveness o Dissemination of information on legal alternatives o Offer legal alternatives, if practicable <input type="checkbox"/> Include in disclosures to students <ul style="list-style-type: none"> o Statement re civil and criminal liabilities o Summary of penalties in federal copyright laws o Institution’s policies on illegal file sharing, including disciplinary actions 	<p>August 14, 2008 (good faith effort) July 1, 2010 (regulations effective)</p>	<p>§668.14(b)(30) §668.43(a)(10)</p>	<p>CIO/Technology Finance and Administration Provost</p>
<p>Servicemembers and Veterans</p> <ul style="list-style-type: none"> <input type="checkbox"/> Members of the armed services, their spouses and dependents, whose domicile or duty station is in a state must be charged in-state rates at public institutions <ul style="list-style-type: none"> o If student is continuously enrolled, must be allowed to continue to pay in-state rate even if active duty servicemember’s duty station changes <input type="checkbox"/> Establish procedures and policies to comply with new readmission requirements for veterans 	<p>First period of enrollment that begins after July 1, 2009 for in-state tuition August 14, 2008 Readmission July 1, 2010 (regulations effective)</p>	<p>HEA Sec. 135 HEOA Sec. 114 §668.18</p>	<p>Registrar Veterans Affairs Bursar</p>

CAMPUS SECURITY			
<p>Emergency Plans and Alerts</p> <ul style="list-style-type: none"> <input type="checkbox"/> Include statement of policy on emergency response and evacuation procedures in annual campus security report (for October 1, 2010 report) <input type="checkbox"/> Establish a procedure for immediate notification of the campus community of a significant campus emergency or dangerous situation <ul style="list-style-type: none"> <input type="checkbox"/> Describe process <input type="checkbox"/> Name responsible parties (by title, office) <input type="checkbox"/> Notification of larger community <input type="checkbox"/> Conduct test of emergency procedures at least annually <input type="checkbox"/> Consider special needs of students with disabilities 	<p>August 14, 2008 (good faith effort)</p> <p>July 1, 2010 (regulations effective)</p>	<p><u>\$668.46</u></p>	<p>Public Information</p> <p>Risk Management</p> <p>Public Safety</p> <p>CIO/Technology</p> <p>Disability Services</p>
<p>Fire Safety [Applicable to on-campus student housing only]</p> <ul style="list-style-type: none"> <input type="checkbox"/> Establish system to gather data on fires in on-campus student housing <ul style="list-style-type: none"> <input type="checkbox"/> Fires, injuries, property damage statistics <input type="checkbox"/> Maintain publicly available log of such fires <input type="checkbox"/> Publish annual fire safety report with fire statistics for three years (when, if available) <input type="checkbox"/> Gather information on fire safety systems in each residence hall <input type="checkbox"/> Keep records of fire drills <input type="checkbox"/> Write policies on fire safety for student residences (or compile existing policies) for inclusion in new annual fire safety report <ul style="list-style-type: none"> <input type="checkbox"/> Policies on fire safety re appliances, smoking, open flames, etc. <input type="checkbox"/> Evacuation procedures <input type="checkbox"/> Education and training programs <input type="checkbox"/> Information on where, whom to report occurrence of a fire <input type="checkbox"/> Plans for future fire safety improvements <input type="checkbox"/> Determine whether annual fire safety report will be included with campus security report or published separately 	<p>August 14, 2008 (good faith effort)</p> <p>July 1, 2010 (regulations effective)</p>	<p><u>\$668.49</u></p>	<p>Residential Services</p> <p>Public Safety</p> <p>Environmental Health and Safety</p> <p>Risk Management</p> <p>Physical Plant</p>

<p>Missing Persons [Applicable to on-campus student housing only]</p> <ul style="list-style-type: none"> <input type="checkbox"/> Set up database and procedures to give students living in on-campus housing the opportunity to name a confidential contact <input type="checkbox"/> Develop policies and procedures addressing missing students <ul style="list-style-type: none"> o Specify where, to whom reports of suspected missing students should be made o How institution will handle such reports o Who will be notified if student is determined to have been missing for more than 24 hours <input type="checkbox"/> Include missing student policy statements in annual security report for October 1, 2010 	<p>August 14, 2008 (good faith effort)</p> <p>July 1, 2010 (regulations effective)</p>	<p>§668.46(h)</p>	<p>Public Safety</p> <p>Residential Services</p> <p>Risk Management</p> <p>Student Affairs</p>
<p>Campus Disciplinary Proceedings</p> <ul style="list-style-type: none"> <input type="checkbox"/> Establish policy to disclose results of campus disciplinary proceedings to victims of crime of violence or non-forcible sex offenses, upon written request 	<p>August 14, 2009</p>		<p>Student Affairs</p> <p>General Counsel</p>
<p>Drugs and Alcohol</p> <ul style="list-style-type: none"> <input type="checkbox"/> Gather data to be added to the next biennial drug and alcohol review <ul style="list-style-type: none"> o Number of drug and alcohol-related violations and fatalities on campus or as part of institutional activities o Number of sanctions imposed by institution as a result <input type="checkbox"/> Assure that campus officials responsible for required disclosures to students are aware of new requirements including a written notice advising students of the penalties for drug violations 	<p>August 14, 2008</p>	<p>HEA Sec. 120 HEOA Sec. 107</p>	<p>Alcohol and Drug Education</p> <p>Public Safety</p> <p>Risk Management</p>
<p>Campus Security Report</p> <ul style="list-style-type: none"> <input type="checkbox"/> Collect hate crime data on four additional categories to be included in campus crime reports <input type="checkbox"/> Add policy statement on the law enforcement authority of campus security personnel <input type="checkbox"/> Add list of any law enforcement agencies with which you have mutual aid agreements or MOUs 	<p>August 14, 2008 (good faith effort)</p> <p>July 1, 2010 (regulations effective)</p>	<p>§668.41 §668.46</p>	<p>Public Safety</p> <p>Institutional Research</p> <p>Risk Management</p>

STUDENT AID			
<p>Student Loan "Sunshine" Provisions</p> <ul style="list-style-type: none"> <input type="checkbox"/> Determine if institution maintains a preferred lender list for FFEL or private lenders <ul style="list-style-type: none"> o Ensure list includes required elements o Develop system to gather loan terms, etc from lenders o Review all literature for students/prospective students that discuss student aid, add loan info or URL o Submit annual information to ED <input type="checkbox"/> Adopt a code of conduct that meets requirements <ul style="list-style-type: none"> o Post on web site o Provide annual notice to employees <input type="checkbox"/> Ensure that "institution affiliated organizations" (e.g., alumni associations and athletic booster clubs) are also aware of their responsibilities 	<p>Aug. 14, 2008 (good faith effort)</p> <p>July 1, 2010 (regulations effective)</p>	<p>§601.10</p> <p>§601.20 - .21</p> <p>§601.30 (DL Insts)</p>	<p>University Advancement</p> <p>Athletics</p> <p>Finance and Administration</p> <p>Financial Aid</p> <p>General Counsel</p>
<p>Cohort Default Rates</p> <ul style="list-style-type: none"> <input type="checkbox"/> Consider potential impact of change in the calculation of cohort default rates for FFEL and Direct Loans to include data for three years of repayment rather than two. 	<p>New calculations begin for FY2009 but will not be used for sanctions until FY2011</p>	<p>§668.16</p> <p>§668.181 - 217</p>	<p>Financial Aid</p> <p>Bursar</p> <p>Public Information</p>
<p>Private Education Loans [note: HEOA included amendments to the Truth-in-Lending Act]</p> <ul style="list-style-type: none"> <input type="checkbox"/> <i>Lender Responsibilities:</i> Review all institutional and non-Title IV loan programs <ul style="list-style-type: none"> o Prepare appropriate disclosure forms o Set up procedures to adhere to timing requirements, including three-day disbursement delay o Set up procedures for collection of self-certification form <input type="checkbox"/> <i>Institution Responsibilities:</i> Decide how self-certification form and financial data will be given to students <ul style="list-style-type: none"> o Chart flow of information and forms <input type="checkbox"/> Determine if preferred lender arrangement(s) exist <ul style="list-style-type: none"> o Scrutinize any resource loan arrangements 	<p>Feb. 14, 2010 (TILA)</p> <p>July 1, 2010 (ED regulations)</p>	<p>HEA Sec. 151-154</p> <p>HEOA Sec. 120</p> <p>HEOA Title X</p> <p>Fed. Reserve Reg Z</p> <p>§601.11 -12</p>	<p>Bursar</p> <p>Financial Aid</p> <p>General Counsel</p>

<p>Perkins Loan Program</p> <ul style="list-style-type: none"> <input type="checkbox"/> Note increases to annual loan limits and allowance for books and supplies <input type="checkbox"/> Review policies, procedures, and communications with borrowers to ensure compliance with changes to requirements for <ul style="list-style-type: none"> o Exit counseling o Total and permanent disability discharges o Forbearance requests o Rehabilitation o Occupations eligible for cancellation benefits <input type="checkbox"/> Consider transfers of funds among campus-based programs (SEOG, Perkins, FWS) in light of expanded authority to move up to 25 percent of allocation from FWS to Perkins, or from SEOG to FWS 	<p>Aug 14, 2008 (good faith effort)</p> <p>July 1, 2010 (regulations effective)</p>	<p>HEOA Sec 461-465</p> <p>§674</p> <p>HEOA Sec 494A (transfer of funds)</p>	<p>Financial Aid</p> <p>Bursar</p> <p>Loan Collections</p> <p>Finance and Administration</p>
<p>Federal Work Study Program</p> <ul style="list-style-type: none"> <input type="checkbox"/> Definition of community service expanded to include the field of emergency preparedness and response <input type="checkbox"/> Allowance for books and supplies increased from \$450 to \$600 <input type="checkbox"/> Amount of prior award year charges that can be paid with current year FWS funds set at no more than \$200 (applies to all Title IV, HEA program funds) <input type="checkbox"/> Electronic disbursements: <ul style="list-style-type: none"> o Institutions may use a “stored-value” card o A student’s written authorization is no long required to make EFT payments 	<p>Aug 14, 2008 (good faith effort)</p> <p>July 1, 2010 (regulations effective)</p>	<p>HEOA 441(c)(1)</p> <p>HEOA 442(c)(4)(d)</p> <p>§675</p>	<p>Financial Aid</p> <p>Bursar</p>
<p>Grants for Access and Persistence (GAP)</p> <ul style="list-style-type: none"> <input type="checkbox"/> Evaluate the possible impact on and demand for institutional aid as a result of changes made by replacement of Special LEAP by Grants for Access and Persistence (GAP). 	<p>July 1, 2010 (regulations effective)</p>	<p>§692</p>	<p>Admissions</p> <p>Financial Aid</p> <p>Finance and Administration</p>

DISCLOSURES			
<p>Consumer Information</p> <ul style="list-style-type: none"> <input type="checkbox"/> Prepare to provide new required disclosures to students <ul style="list-style-type: none"> o employment and graduate school/professional education of graduates o disaggregated graduation data by ethnicity, receipt of federal aid o changes to campus security report <p>For details and recommendations for disclosures, see http://nces.ed.gov/pubs2010/2010831.pdf.</p>	<p>August 14, 2008 (good faith effort)</p> <p>July 1, 2010 (regulations effective)</p>	<p>§668.41(d)</p> <p>§668.41(e)</p> <p>§668.45</p>	<p>Financial Aid</p> <p>Institutional Research</p> <p>University Police</p> <p>Student Affairs</p> <p>Academic Affairs</p> <p>Alumni Relations</p> <p>Colleges/Departments</p>