

# Summary Report for the Gainful Employment Focus Groups



**February 10, 2016**

Prepared for:  
U.S. Department of Education  
Washington, DC

Prepared by:  
Westat  
*An Employee-Owned Research Corporation*<sup>®</sup>  
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## 1.1 Purpose

The U.S. Department of Education published the final regulations on Gainful Employment (GE) programs in the *Federal Register* (79 FR 64890) on October 31, 2014. The regulations apply to educational programs that are eligible to receive student financial assistance under Title IV of the Higher Education Act of 1965, as amended, since these programs “prepare students for gainful employment in a recognized occupation.” The purpose of the regulations, which go into effect on January 1, 2017, is to address growing concerns about educational programs that “are required by statute to provide training that prepares students for gainful employment in a recognized occupation (GE programs), but instead are leaving students with unaffordable levels of loan debt in relation to their earnings, or leading to default.” Nearly all educational programs at for-profit institutions of higher education, as well as non-degree programs at public and private nonprofit institutions such as community colleges, have GE programs. The intent of these regulations was to address the Department’s key concerns about some of the GE programs. According to the regulations, some programs:

- do not train students in the skills they need to obtain and maintain jobs in the occupation for which the program purports to provide training;
- provide training for an occupation for which low wages are not commensurate with program costs; and
- are experiencing a high number of withdrawals or “churn” because relatively large numbers of students enroll but few, or none, complete the program, which can often lead to default on student loans.<sup>1</sup>

The full list of required disclosure items appear in Appendix A of this report; however, the regulations specify that, “we [the Department] do not intend to include all of the disclosure items listed in § 668.412 on the disclosure template each year. We will use consumer testing to identify a subset of possible disclosure items that will be most meaningful to students.”<sup>2</sup>

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<sup>1</sup> 79 FR 64890 (October 31, 2014).

<sup>2</sup> 79 FR 64976 (October 31, 2014).

To facilitate identifying a subset of possible disclosure items, the Department contracted with IT Innovative Solutions (INOVAS) and Westat to plan and conduct one focus group with students currently enrolled in GE programs and one focus group with representatives from institutions that offer GE programs who are responsible for submitting the data to the Department. The main purpose of the testing of the disclosure items was to determine which specific items students and representatives perceived as most meaningful to students as they decide on which GE program and institution to enroll in.

## **1.2 Methodology**

### **1.2.1 Participants**

A total of 14 individuals participated in two separate focus groups: nine students in the first focus group and five institutional representatives in the second group. For the student focus group, Westat prepared the recruitment script and hired Shugoll Research, an experienced marketing research firm in Bethesda, to recruit a diverse group of students from the DC metropolitan area. The characteristics of the student participants were as follows:

- Five students were enrolled in community colleges and four students were enrolled in for-profit institutions; students represented eight different types of GE programs.
- Three students were enrolled in 1-year vocational/career programs and six students were enrolled in 2-year vocational/career programs.
- Seven of the nine students had student loans.
- Student ages ranged from 20 to 28.
- All students came from low- to moderate-income families (annual family income under \$75,000).
- Five students were enrolled full time, while the remaining four students attended part time.
- Five students were female and four students were male.
- Eight students were minorities.

Westat recruited institutional representatives, using contact information for Integrated Postsecondary Education Data System (IPEDS) keyholders provided by INOVAS. Westat recruited eight representatives; however, only five representatives participated in the focus group, because they had last-

minute scheduling conflicts. Three of the participants were from community colleges and the remaining two were from for-profit institutions in the DC metropolitan area. These five female representatives averaged 9.6 years of experience working in institutional research or similar offices of their current institutions.

## 1.2.2 Data Collection

During both focus groups, the moderators first facilitated a general discussion with participants. Students discussed their experiences in identifying institutions that offered GE programs in their field of interest, and institutional representatives discussed their specific responsibilities in collecting IPEDS, GE, and other data to submit to the Department. (Appendices B and C contain the student moderator guide and PowerPoint slides and representative moderator guide and PowerPoint slides, respectively.) Both students and institutional representatives were asked to reflect on the utility and importance of GE data provided on college websites. Students were also presented with an example of a template, populated with fictional data, which might appear on an institution's website. For discussion purposes, disclosure items were grouped in the following categories:

- program information (i.e., credit or contact hours and program length);
- student debt (i.e., students receiving Title IV and/or private loans, loan repayment rate, median loan debt, and program default rate);
- program success (i.e., completion and withdrawal rates); and
- program outcomes (i.e., job placement rate, mean or median earnings, and annual earnings rate).

Institutional representatives were also asked to respond to the student warning language provided in the regulations.<sup>3</sup>

After a discussion of the disclosure items under each of the four categories above, both students and institutional representatives were asked to rank items based on their importance to students. Participants completed three sets of ranking exercises:

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<sup>3</sup> Under the regulations, if a GE program could become ineligible based on its final debt-to-earnings rates calculated by the Department for the next award year, the institution must provide warnings to both current and prospective students.

- **Ranking subelements within possible items** (e.g., Which is most important: median loan debt for students who *completed*, students who *withdrew*, or *all students who completed and withdrew* from the program during the most recently completed award year?). See Appendix D-1 and Appendix D-2 for the student and representative ranking exercises, respectively.
- **Ranking possible items within each of the main data elements** (e.g., Which is most important: completion rates for full-time and part-time students or withdrawal rates?). See Appendix E-1 and Appendix E-2 for the student and representative ranking exercises, respectively.
- **Ranking the 10 main data elements** from 1 to 10 with 1 being the most important. See Appendix F-1 and Appendix F-2 for the student and representative ranking exercises, respectively.

### 1.2.3 Data Analysis

Both the student and institutional representative focus groups were conducted in Westat’s focus group facility on the Rockville campus and were audiorecorded to ensure the discussion was accurately captured for use in preparing the notes for analysis. Members of the focus group team analyzed notes to identify themes and then summarized them for the report.

### 1.2.4 Limitations

As with all focus groups, data collected from these two focus groups cannot be generalized; the people who participated may not necessarily be representative of the larger population of students who may benefit from GE information. Additionally, the numbers involved were too small to justify extrapolation to the larger community, and an opinion expressed by one participant may not necessarily have reflected the opinions of all people in the focus group. Although our goal was to ensure equal participation from all students and institutional representatives, not all participants answered every question.

## 1.3 Organization of Report

This report is organized into four sections. Section 1 provides an introduction to the study and methodology used. Section 2 describes the students’ discussion about their perspectives on their college search and decision-making process, thus providing context for the remaining discussion about specific disclosure items. This section also includes more detailed background information on the institutional

representatives' positions in their institutions and experience in submitting IPEDS and other data to the Department and other agencies.

The third and more substantive section of this report focuses on students' and institutional representatives' understanding of the disclosure items and perceptions of their importance. (See Appendix A for the full list of disclosure items.) This section is based on both the focus group discussion and the results of the ranking exercises. The results are presented by type of focus group and institution, where differences exist.

The final section of this report summarizes the disclosure items that focus group participants considered most useful to students in making informed decisions about a GE program to attend. This summary is based on the results of the ranking exercises completed by students and institutional representatives. This section also offers suggestions for revisions to the student warning language and for additional consumer testing to improve the comprehension of the content of the GE template, and the accessibility of the GE disclosure items on institutions' websites.



### 2.1 Students' College Search and Decision-Making Processes

Students reported learning about their college and program of study in various ways. The most commonly reported way to identify a program or institution was through a friend, coworker, or family member who had taken classes or gone through the program at the institution. Two students reported meeting with a counselor or a recruiter. Additionally, two students described using a web search or checking a particular institution's website to see about program offerings, and two others mentioned seeing advertisements in the mail or newspaper.

Students' reasons for choosing their specific college or institution were generally unrelated to the items covered in the Gainful Employment (GE) requirements. Convenience seemed to be the most important element, with location (i.e., distance of the program from their home) being the most commonly mentioned criterion. One student also mentioned the time classes were offered, while another noted she had already been enrolled since it was the local community college. Two students described making a "last minute" or "rush" decision to enroll; both of these students attended for-profit institutions. In another case, the college was the only institution that offered a student's particular program of study. Only one student reported that the school's reputation was a factor, and only one student specifically mentioned cost.

### 2.2 Representatives' Positions and Familiarity With IPEDS and Data

All institutional representatives reported collecting, analyzing, and reporting data for the Integrated Postsecondary Education Data System (IPEDS). Most noted that they also report these data in aggregate to other organizations, including accrediting bodies, Achieving the Dream,<sup>4</sup> and the Voluntary

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<sup>4</sup> See <http://achievingthedream.org/join-the-movement/colleges>. Achieving the Dream is described as "a comprehensive non-governmental reform movement for student success."

Framework of Accountability.<sup>5</sup> All institutional representatives were aware of the GE data currently present on their institution’s website, listing completion rates, time to completion, credits, program length, average loan debt, and number of completers as existing data elements.

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<sup>5</sup> See <http://vfa.aacc.nche.edu/about/Pages/default.aspx>. The Voluntary Framework of Accountability “gauges student progress and outcomes including pre-collegiate preparation (such as developmental education and Adult Basic Education), academic progress and momentum points, completion and transfer measures, and workforce outcomes for career and technical education.”

# Gainful Employment Elements

## 3

This section will describe focus group participants’ perspective on their understanding, level of importance, and use of the GE elements relating to program information, student debt, program success, and program outcomes.

### 3.1 Program Information (Program Length and Credit or Contact Hours)

#### 3.1.1 Program Length

**All institutional representatives reported that information regarding program length in calendar time (e.g., weeks, months, years) is very important to students and the majority of focus group students agreed.** However, there were a few students who expressed a more neutral opinion about the level of importance and usefulness of displaying this information in calendar time (i.e., 12 months vs. 32 credit hours). Those students, especially those in a trade program, would like the information but did not feel that knowing program length would specifically influence their decision to enroll. To explain, one student stated, “I want the trade degree either way so I’m gonna have to do it but it would help to know how long and what it’s going to take to get stuff done.”

#### 3.1.2 Credit or Contact Hours

**When focusing specifically on credit hours, all institutional representatives reported that students would have problems understanding the difference between clock and credit hours.** Institutional representatives were asked to clarify which terms were most commonly used at their particular institution—clock hours, credit hours, or contact hours. Among these institutions, the term “clock hours” was not used at all. Instead, representatives reported either using credit hours or contact hours, or both. For those institutions that use both, credit hours were used in reference to degree programs of credit-bearing courses, while clock hours were used in certificate or noncredit programs.

**When asked during the focus group to define the concept of “credit hours,” many of the students could not.** However, students were asked during the focus group recruitment screening process to indicate the number of total credits or contact hours completed at their current school. Two students provided contact hours only, five students provided credits only, and two students provided both contacts and credits. The difference between how the question was asked on the recruitment screener and how it was asked during the focus group may have influenced the responses. On the screener, students were asked about how many credits they had completed and then how many contact hours they had completed. In the focus group, the students were asked about their understanding of “credit hours.” Adding the word “hours” may have confused the students. When asked to explain their understanding, one student working towards a 1-year career certificate stated:

*The numbers don't make sense to me. It's probably the number of hours credit-wise. It's like when you do college classes you get a credit or however many per class so it's probably something like that. I don't know why they put hours. Credits and hours are two separate things. I'm on hours, I don't get credits.*

**Many of the students were confused when they were asked about the concept of “credit hours,” in the focus group. When they were asked to choose the most helpful piece of information, the majority would rather have information about the number of months it takes to complete a program rather than credit/contact hours.** A few students could not decide and thought it was important to know both credit hours and number of months. Students also made a distinction between what was needed when attending a trade school compared to a 2- or 4-year college.

*I asked, okay, how long is this program if I [be]come full time? 12 months? Okay, what about part time? This [same] amount of time? Okay, what are the hours? What are my options? I asked all those questions because I already knew it's not like college. Trade school is you know, not a set schedule...well, it is a set schedule, but it's different than college.*

## **3.2 Student Debt (Students Receiving Title IV/Private Loans, Median Loan Debt, Loan Repayment Rate, and Program Default Rate)**

### **3.2.1 Percentage of Students Receiving Title IV or Private Loans**

**Student perspectives on the usefulness of information regarding the percentage of students receiving Title IV and/or private loans and whether they would use it varied.** Two students noted

information on loans would be important to them either because they have taken out loans and felt the information was applicable to them, or that it would provide additional information for them in considering loan type. In contrast, three students disagreed about the importance of this information, reporting that they are unable to receive federal financial aid or refuse to take out loans.

**Institutional representatives expressed concerns about students' lack of financial literacy that would affect their ability to interpret these different measures of loan debt.** One institutional representative noted that students have trouble understanding what Title IV aid is: “Many students are first generation college students who don’t have a proper understanding of financial aid, or there is a disconnect about what they could apply for.”

Institutional representatives from for-profit institutions noted that they do not currently provide information on private loans, because there is no way for the college to know if students have taken out private loans and the colleges do not have direct partnerships with loan providers. Institutional representatives also indicated there was a need for clear definitions of loan debt and which students would be included in the calculations and cohort, as this raises challenges with reporting. As described by one representative, “Students can obtain a certificate, having loan debt, then come back for another certificate and get more debt. There are issues detailing data when things like this occur.”

### 3.2.2 Median Loan Debt

**In response to a table presenting sample median loan debt amounts for (1) students who completed, (2) students who withdrew, and (3) students who completed and withdrew, most students expressed difficulty interpreting the item “completed and withdrew” and found it confusing.** One student said that the information was like a “foreign language” and they would need to meet with a financial aid staff member to interpret the information. Additionally, students expressed a preference for greater detail; however, the type of detail that they desired was personalized information related to their own particular loan debt.

**Institutional representatives felt that information on median loan debt was very important; however, they expressed concerns that students would not understand the term “median.”** With regard to displaying the data for the three types of students (i.e., completed, withdrew, completed and withdrew), they unanimously agreed that presenting such data for completers was most important, and for those who withdrew least important. One institutional representative raised concerns that students would misinterpret lower median loan debt for those who withdrew, noting, “By including a withdrawal rate it’s

like saying ‘if you give up, it’ll cost you less.’” In a later discussion regarding loan repayment rate, a student alluded to this concern noting that when he enrolled, he saw some information presented for students who withdrew, and it got him thinking about withdrawing. Another representative added that it is a common problem at the institution that students withdraw without understanding their continuing financial responsibilities for the time completed.

When presented with the opportunity to select the most important or useful indicator of median loan debt, all institutional representatives and students selected “students who **completed** the program during the most recently completed award year” (Exhibit 1).

**Exhibit 1. Rankings of median loan debt indicators**

Indicator	Students (n=9)	Institutional representatives (n=5)
Students who <b>completed</b> the program during the most recently completed award year .....	9	5
Students who <b>withdrew</b> from the program during the most recently completed award year .....	0	0
All of the students who completed <b>and</b> withdrew from the program during the most recently completed award year ....	0	0

### 3.2.3 Loan Repayment Rate

**Student comments regarding the loan repayment rate focused on the lack of detail.** This information was not seen as useful as it did not include the details that students wanted, such as the monetary amount of loan debt, the amount of payments, or the number of students who have paid loans in full. Students noted that it simply stated the percentage of students “making payments” and had concerns that some students might be paying \$5, while another paid \$500, and therefore the information was not useful to them due to the variability in what students owe and pay. Their primary concern was how many students were able to pay off their loans in full.

Student opinions on the importance of the loan repayment rate element were partially divided by their personal experience with student loans. Six students stated it was not important—at least three of these students said they had not taken out any loans.<sup>6</sup> One student noted, “Just because someone else was able

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<sup>6</sup> The number of students reporting they not taken out loans in the focus group is inconsistent with student reports on the focus group screener in which only two students indicated they had not taken out loans.

to make their payments doesn't mean I will be able [to] make mine." This comment was echoed by another student.

Students found more utility in breaking down these data by those who completed and those who withdrew in relation to loan repayment rate than they did for other elements. However, students were divided on whether differing loan repayment rates indicated something about the student or the school. Others noted that there were various reasons for withdrawing, so one could not necessarily fault the school.

**Institutional representatives had some difficulty interpreting this measure.** One representative questioned whether it referred to how much students would be paying or to how many people are paying off their loans. Representatives reported that they felt it could be useful for students; however, it's not clear that representatives accurately interpreted this measure. They cited reasons such as, "It would help students with academics as well as life planning" and "If someone graduates and makes a lot of money, students can see this and it may be helpful to graduates to know how much money they can make to pay off their loan." Another representative felt that it is really an institutional issue to ensure that students understand that paying back loans is important; she noted: "As a college we're hoping to make good citizens and [we're hoping] that the students would be able to pay back their loans whether or not they get a job that supports the repayment."

As with the previous data element (median loan debt), most students and all institutional representatives selected "students who **completed** the program" as the most important indicator of loan repayment rates (Exhibit 2).

**Exhibit 2. Rankings of loan repayment rates**

Indicator	Students (n=9)	Institutional representatives (n=5)
All students who <b>enrolled</b> in the program .....	3	0
Students who <b>completed</b> the program .....	6	5
Students who <b>withdrew</b> from the program .....	0	0

### 3.2.4 Program Default Rate

**Roughly half the students indicated that they generally understood what loan default meant.** About a third of students could see why the information would be useful, with one student noting, "If the percentage is higher, it could ruin my perception of the school or the schools' reputation, because like if

it’s 67 percent of people in default....” However, two other students felt the information would not be very helpful, because default occurs on a case-by-case basis to students with varying loan amounts, and for various reasons. Overall, when asked if they would use program default rate when making a decision about an institution or college, all students said no.

**Institutional representatives were curious about how this rate would be calculated using information the colleges provide.** One representative expressed concerns about how the program cohort would be defined, as many students often switch programs. Another representative felt that students would need a definition or description to understand the meaning and its importance. Only one representative addressed the question of usefulness to students:

*This rate may give students an idea of which program is not beneficial in the long run. They can make an assumption based on this information that students making a payment are gainfully employed.*

### 3.2.5 Student Debt Rankings

Institutional representatives believed that students likely will not look at this information on loan repayment rates, debt, and cohort default rates. They said the major factors that drive students toward an institution are: (1) location of the school, (2) tuition rates, and (3) what their friends say about the school. Location and word of mouth were two factors that students mentioned in an earlier question regarding why they selected a program or institution.

Despite these caveats, institutional representatives and students had similar rankings for all four data elements related to student debt (Exhibit 3). Participants were asked to rank in order of importance these items, with 1 being “most important or useful [to students].” As a result, elements with a lower mean score were ranked as being more important than those with a higher score. Students and institutional representatives ranked these items in the same order of importance, although mean scores differed between the groups.

**Exhibit 3. Overall ranking of student loan debt data elements**

Student loan debt element	Student mean (n=9)	Institutional representative mean (n=5)
Loan repayment rate .....	1.9	1.8
Percentage of students who received a Title IV or private loan .....	2.6	2.0
Median loan debt .....	2.7	2.2
Program loan default rate .....	2.9	4.0

## 3.3 Program Success (Completion and Withdrawal Rates)

### 3.3.1 Completion Rates

**Overall, institutional representatives expressed that reporting completion rates for their nontraditional student population would be challenging.** During the discussion, institutional representatives were told that the completion rates could be measured by 100, 150, 200, and/or 300 percent of the program length for full-time and part-time students. Given this information, all representatives agreed that for full-time students, completion rates measured by 100 percent to 150 percent of the program length would be most useful. According to one representative, “For IPEDS, institutions aren’t doing 300 percent for anything.” Additionally, one of the for-profit institutions stated that their school has nontraditional programs and does not use semesters. Instead, they have classes of 13–14 months. If a student were to fail a course, they will have to wait until the program rolls around the next year or year and a half, which makes interpreting these completion rates data more challenging.

**It was difficult for institutional representatives to select one or two of the four rates as the most important due to the variability of full-time/part-time status among some nontraditional students and the uncertainty of who was considered a “part-time” student.** Institutional representatives reported that in their institutions, not many students are consistently full time or consistently part time. For example, some students may only enroll in fall classes but not enroll in any courses during the spring due to their work schedules. To further decipher the completion rate data, representatives thought it would be advantageous to define the term “part time.” As one representative explained, “Students can be part time and take 3 credits, or they can be part time and take 9 credits.”

**Moreover, institutional representatives were not concerned about the usefulness of this information because full-time and part-time students may approach program completion from different perspectives.** Representatives emphasized that part-time students attend classes when they have free time and will stop going “when they have more important things to do,” while full-time students “go to school thinking they want to finish.” Therefore, providing this information would not be as critical to their certificate or degree attainment goals as other external factors in their lives. However, the representatives agreed that using the terms “1 year” and “2 years,” rather than 100 percent and 200 percent, would be better understood.

**Completion information presented to the student focus group participants generated considerable discussion.** Students were shown an example that said “60% of full-time and 0% of part-time students

who enrolled in the program in 2012-2013 finished within 1 year. (Note: program length is one year)” and then asked to interpret the information. For the most part, students thought the information was fairly straightforward but not as comprehensive as they would have liked. For instance, one student wanted to know more about the program and understand how only 60 percent of enrolled students could graduate within 1 year of a 1-year program. Another student thought that the information was misleading and insisted that if a program is supposed to be a “1-year program”, then full-time and part-time status should be irrelevant.

*...so the program is targeted for 1 year, maybe they should have written program length is 1 year for full-time students. They should have been more clear about that. The full-time students are right on target, finishing up in a year, the part-time students, it's going to take them longer...*

**Many of the students thought that the completion information could be used as a screening criterion as they searched for the best program, while others would not be influenced by it at all.**

Although the numbers in the focus group example were hypothetical, students assessed that the information painted an unflattering picture of student success at the fictitious college. Similar to the representative’s assessment, other students stated that they would not have been influenced by such information, because program completion is an individual pursuit—indicating that people come and go from programs frequently for a variety of different reasons (e.g., failing, finances, scheduling, personal issues). As a result, they do not feel that an aggregated number would reflect their personal experience in a particular program of interest.

**The majority of students considered completion information to be very important.** The remaining students thought that the information was less important, because they would rather talk to someone (either college personnel or enrolled students) to understand the culture of program completion at a given institution and get a more detailed picture than what was provided on the institution’s website.

Regarding the four categories of completion rate data, students were asked whether the breakdown, as displayed in Exhibit 4, of current completion rates by full-time and part-time status was helpful. All students thought the four categories were confusing and did not seem to understand the percentages of time to completion (e.g., 100 percent) as well as they understood the years to completion (e.g., 1 year). A few students agreed with the representatives and thought the information was not important, because “completion is on an individual basis,” while others considered it very important to have during the program selection process.

**Exhibit 4. Program completion rates slide presented to students**

Time to completion	Full-time students	Part-time students
1 year (100%).....	60%	0%
1.5 years (150%).....	70%	45%
2 years (200%).....	90%	80%
3 years (300%).....	92%	85%

### 3.3.1.1 Ranking of Completion Rates

Students and institutional representatives were also asked to prioritize the two most important completion rates, both for full-time students and for part-time students, out of the four possible options. Students selected 100 and 200 percent of the program length as most important for both full- and part-time students.

Institutional representatives similarly agreed that 100 percent of the program length was an important measure; however, representatives selected 150 percent of the program length as an important completion rate, both for full-time and for part-time students. One representative did not make a selection for the part-time student completion rates, instead writing in the comment: “Concerns about the cohort. Part-time students can [have] different amount of credits.”

**Exhibit 5. Rankings of completion rates**

Completion rate	Students (n = 9)		Institutional representatives (n = 5)	
	Full-time students	Part-time students	Full-time students	Part-time students
Completed within 100 percent of the length of the program .....	8	7	5	3
Completed within 150 percent of the length of the program .....	1	3	5	4
Completed within 200 percent of the length of the program .....	6	7	0	1
Completed within 300 percent of the length of the program .....	2	1	0	0

### 3.3.2 Withdrawal Rates

**The institutional representatives had a difficult time interpreting withdrawal rate data.** Similar to completion rates, representatives were provided a slide that displayed withdrawal rates (100 percent and

150 percent) for both full-time and part-time students and then asked whether or not they thought both rates were equally important to report for both types of students (i.e., full-time and part-time students). A few of them did not understand what 150 percent withdrawal rate meant and others did not understand the value of this information. Similar to the students, the representatives cited several different reasons a student would withdraw from a program, which are not reflected in the aggregated percentage. Additionally, according to one representative, the information seemed to be more useful on a course-by-course basis and not at the program level. For those reasons, all representatives agreed that students would have a better understanding of completion rates.

**Students' curiosity about program quality was piqued due to the withdrawal data.** Students were presented the following information and asked to interpret it: *Among students who enrolled in 2012–13, 5 percent of students withdrew within 12 months of being in the program. 10 percent of students withdrew within 18 months of being in the program.* The majority of students understood that the number of students withdrawing from this particular program was fairly low, which reflected positively on the success rate of the students in the program.

In comparing the two withdrawal rates (5 percent and 10 percent), the students saw the value in presenting the withdrawal rate at different increments of time and desired to see what the withdrawal rate for this fictitious school would be in another 6 months. As illustrated in the conversation below, students noted that the withdrawal rate increased over time. As a result, they preferred to see additional points in time to make a more comprehensive assessment of the quality of the program.

**Student 1:** [The increase] could be that [those students] saw how the program was and decided to drop, maybe if we kept going to 36 months, maybe it would be even more.

**Student 2:** Maybe, they didn't give us that much though. They gave us what was appealing to the eye.

**Student 3:** It definitely says the number doubled just within a 6-month period.

**Student 1:** The longer you stay, the more you realize how bad [the program] was, and the numbers just keep dropping. Who knows, [the withdrawal rate could be] 20 percent by end of that year.

**When polling the students about the level of importance of the withdrawal rate compared to the completion rate, the majority said that the withdrawal rate, although interesting, was less important.** These students wanted to know the information but did not think it would influence their decision to attend a school. The remaining students thought that withdrawal rates were as important as completion rates and would prefer to have access to both. According to one of these students, "If I'm

choosing, I do want to know if this school has something to do with people withdrawing, so I say it's as important.”

### 3.3.2.1 Ranking of Withdrawal Rates

Students and institutional representatives were also asked to indicate which of two withdrawal rates was most important to them. The majority of student participants selected percentage of students who withdrew from the program within 100 percent of the program length (Exhibit 6). Two of the five institutional representatives elected to skip this question, instead writing in the following comments: “not helpful” and “neither [rate was helpful] using this language.” Of the three institutional representatives who responded, two selected the percentage of students who withdrew from the program within 150 percent of the program length.

Additionally, students and institutional representatives were asked to select which element (completion or withdrawal rates) was important to them (Exhibit 6). As there were only two data elements, a mean was not calculated; instead, the number of students and institutional representatives selecting each element is presented. As discussed above, both institutional representatives and students overwhelmingly indicated a preference for completion rates over withdrawal rates.

**Exhibit 6. Rankings of withdrawal rates and preference for completion vs. withdrawal rates**

Program success item	Students (n=9)	Institutional representatives (n=5)
<b>Withdrawal rates</b>		
Percentage of students who withdrew from the program within <b>100 percent</b> of the program length .....	6	1
Percentage of students who withdrew from the program within <b>150 percent</b> of the program length .....	3	2
No response .....	0	2
<b>Completion rates vs. withdrawal rates</b>		
Completion rates for full- and part-time students .....	8	5
Withdrawal rates for full- and part-time students .....	1	0

## 3.4 Program Outcomes (Job Placement Rates, Mean or Median Earnings, Annual Earnings Rate)

### 3.4.1 Job Placement Rates

**When discussing job placement rates, participants assigned value to the information although it was difficult for them to define the meaning of job placement rates.** For instance, students articulated reasons job placement rates might be helpful, including helping them to determine whether a school was “worth it” in time and money, or in making a decision to search for another school if the rate was low. However, it became clear over the course of the discussion that many students misinterpreted the meaning of program and/or institution job placement rate, thinking that it meant the percentage of students that a program/institution assisted in placing into jobs. Students were also unclear as to whether the rates referred to students employed within one’s field, or generally employed.

**Institutional representatives focused primarily on the logistics and processes it would require to collect job placement rate data.** Two representatives, who each work for for-profit institutions, described the extensive process they use to check and confirm former student employment, which is required for accreditation. Another representative, from a community college, noted that she believed this information was important to collect. However, representatives from community colleges were concerned over the burden it would require to collect these data. They desired additional information about how exactly the data would be collected, whether through student follow-up, state wage data, or other means. Additionally, representatives also raised the question of whether the job placement rates referred to employment in the student’s field of study and, if so, how that would be defined.

**Students and institutional representatives varied in their responses when asked to select a job placement rate that was most important to them.** Nearly all students were evenly split between placement rate for the program and placement rate for both the program and institution, with only one student selecting job placement rate for the institution only. Institutional representatives had a slightly different response. Two institutional representatives declined to select a job placement rate and instead wrote comments, including, “Concerns with placement rate as language and implication that the institution gives jobs.” Of the three that responded, all agreed the placement rate for the program was most important (Exhibit 7).

**Exhibit 7. Ranking of job placement rates for program, institution, or both**

Placement rate	Students (n=9)	Institutional representatives (n=5)
Placement rate for the program .....	4	3
Placement rate for the institution .....	1	0
Placement rate for the program <b>and</b> the institution .....	4	0
No response .....	0	2

### 3.4.2 Mean or Median Earnings

**Despite the moderator providing descriptive definitions of mean and median, student comments illustrated a lack of understanding of the two concepts.** Students were largely more comfortable with the concept of “average,” however, their interpretation was inaccurate.

**Representatives expressed concerns that these measures could potentially penalize institutions for student choices.** Multiple representatives provided examples of how these figures would be affected by choices such as becoming a stay-at-home mother, underreporting earnings (such as those working informally in the beauty industry), and working in lower paying careers.

Following the discussion about mean and median earnings, students and institutional representatives were asked to select their preference for either mean earnings or median earnings. The majority of students selected mean earnings (Exhibit 8).

**Exhibit 8. Preference for mean vs. median earnings**

Earning indicator	Students (n=9)	Institutional representatives (n=5)
Mean earnings .....	8	2
Median earnings .....	1	1
No response .....	0	2

Of the five institutional representatives, only three selected a response. Two respondents instead inserted comments, one noting “neither using this language” and the other stating “this needs to be defined for students.” Of the remaining three respondents, two selected mean earnings and one selected median earnings.

When asked to select whether mean or median earnings information was most important for students who completed the program, students who were in withdrawn status at the end of the cohort period, or those students who completed or were in withdrawn status, most students again selected completed. Similarly, all institutional representatives who responded selected students who completed; one representative did not respond, instead writing the comment “Only those who completed ignores time lag,” presumably referring to the fact that many students temporarily leave the institution, work, and cycle back.

Exhibit 9. Rankings of mean or median earnings for completers, withdrawers, or both

Mean and median earnings disclosure item	Students (n=9)	Institutional representatives (n=5)
Students who <b>completed</b> the program during the cohort period .....	6	4
Students who <b>withdrew</b> from the program during the cohort period .....	0	0
All of the students who completed the program or were in withdrawn status .....	3	0
No response .....	0	1

### 3.4.3 Annual Earnings Rate

Annual earnings rate was not seen as a helpful measure to students, primarily because they did not know how to interpret the figure. However, students indicated that the concept of comparing earnings to debt was important to them. One student summarized this sentiment:

*I wouldn't understand the numbers, but I would want to know is this field I'm going into going to be worth it at the end of the day. Am I going to be living to pay back school, am I going to benefit from taking this program. To me, it would be important.*

A number of students made suggestions for information related to this item that they would like to see:

*I would like to see a pie chart of different percentages, how much am I paying of my loans, how much is going in my pocket, what I am making...*

*Maybe break down by average of what people make a year by what they have in loans.*

*I want to see a ratio. A ratio of what I'm making versus what I owe. Fraction type thing.*

...the average of what they're gonna make, and then the average of what they have, what you're going to come out paying. How does it compare.

When you look at the number, it's not significant. If you gave an example, like if you're making \$40,000 or something, this is what you'd owe.

Despite students' difficulty in interpreting the annual earnings rate, seven students rated this item as "important" or "very important." Students noted that "any information about earnings is important," although one noted "but not the way it's displayed here."

### 3.4.4 Ranking of Outcome Elements

As with the other disclosure items, students and institutional representatives were asked to rank in order of importance the three data elements related to program outcomes. Items with a lower mean score were ranked as more important than those with a higher score. Students and representatives again ranked elements in the same order of importance.

**Exhibit 10. Rankings of program outcome indicators**

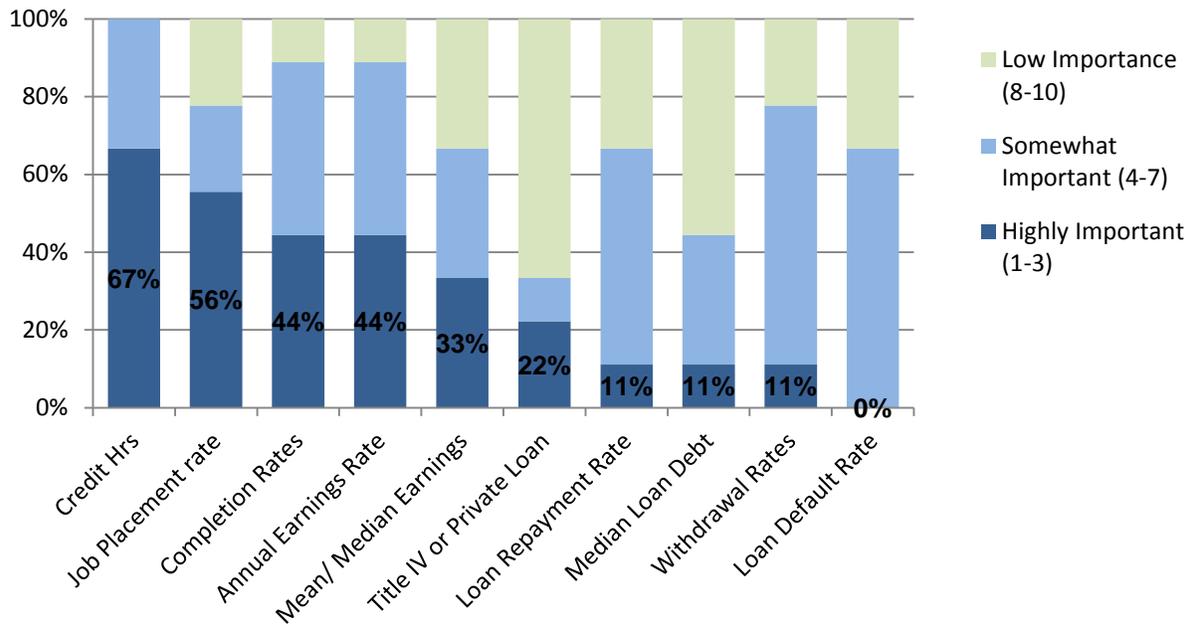
Program outcome disclosure item	Student mean (n=8)	Institutional representative mean (n=5)
Job placement rate.....	1.6	1.6
Mean or median earnings .....	2.1	2.0
Annual earnings rate .....	2.3	2.4

## 3.5 Overall Ranking of All GE Data Elements

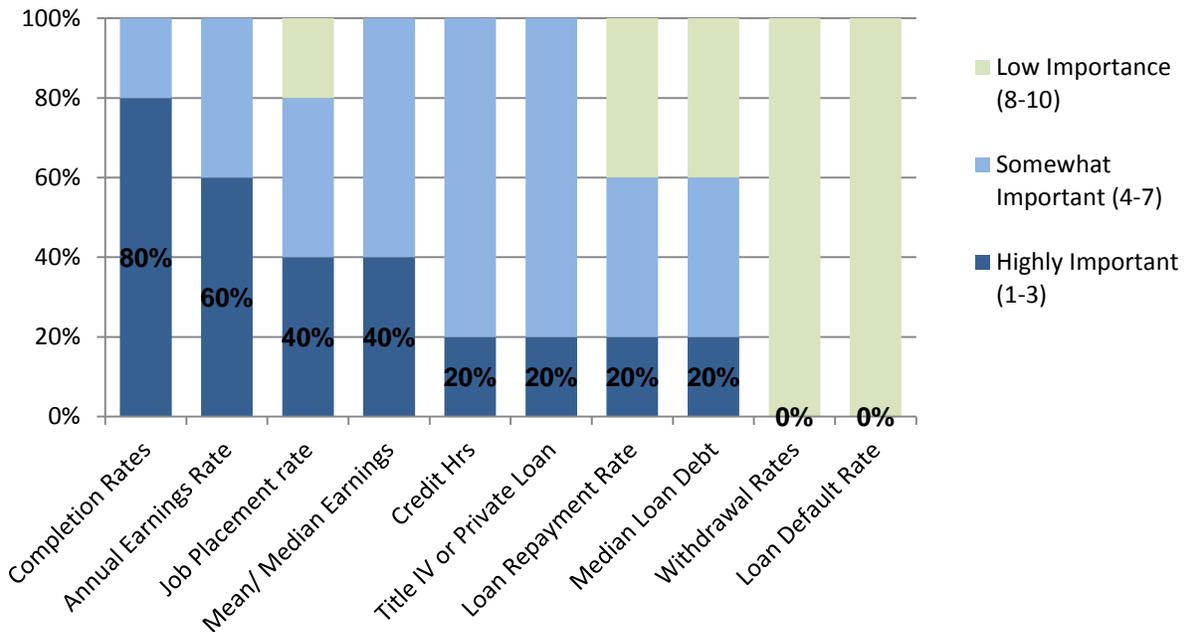
At the end of each focus group, students and institutional representatives were asked to participate in an exercise in which they ranked in order of importance all 10 data elements discussed during the focus group. Due to the wide variation in the rankings and the small numbers of participants, rankings are grouped into "highly important" (1–3), "somewhat important" (4–7), and "low importance" (8–10).

The disclosure items that were most frequently ranked as highly important (i.e., a ranking of 1-3) by both students and institutional representatives were *job placement rate*, *annual earnings rate*, and *completion rate*; however, these were ranked in a different order between the groups (see Exhibits 11a and 11b). Please note that the most highly ranked item by students, *credit hours*, was only ranked as highly important by 20 percent of institutional representatives

**Exhibit 11a. Student distribution of rankings of all data elements**



**Exhibit 11b. Institutional representative distribution of rankings of all data elements**



We concluded the discussion about the GE items with institutional representatives by asking about the burden associated with collecting these data for all relevant programs at their institutions. Assuming this task would take place once a year, one representative described that it was the analysis component of this task that is time-consuming, not the data collection. Furthermore, the amount of time needed to complete

this task depended on the school, size, the number of GE programs involved, and the time it takes to set up, test, and modify their data systems to accommodate these new items.

## 3.6 Warning Language

The final discussion with institutional representatives focused on the student warning language that appears in the regulations:

**Warning Language:** *This program has not passed standards established by the U.S. Department of Education. The Department based these standards on the amounts students borrow for enrollment in this program and their reported earnings. If in the future the program does not pass the standards, students who are then enrolled may not be able to use federal student grants or loans to pay for the program, and may have to find other ways, such as private loans, to pay for the program.*

**Institutional representatives would like further clarification of the language used in the warning and they believe that students would have an equal or even harder time interpreting the information.** The representatives reported that the language, as written, will confuse some students and ultimately deter them from enrolling. The representatives were concerned that students would read the first sentence and interpret it to mean that the school is not accredited or that a degree from this program/school would not be of value:

*Students will be confused and want to know what to do next. It's confusing because 'standards' does not refer to the quality of the education that they are receiving in the program; it's tied to other people in the program not doing what they need to do. It might be quality of the program, but in essence "Not passing standards" in this case is related to the payment of the loans that student took out. This would lead me to believe the program is not worthy of my time.*

**In addition to concerns about how students would interpret the language, the representatives had questions of their own.** Mainly, they wanted to know the timeframe of the sanction (i.e., "is it indefinite? 3–5 years?") and whether or not the warning indicates the start of a probationary period. Additionally, they wanted to know how the warning information would be provided and to whom. Understanding "who knows what and when" was very important to them. Their concern is that students will receive this information without anyone to help them interpret what is being conveyed. Representatives also expressed a need for flexibility to personalize the information for their student body and other key audiences.

**Representatives offered several suggestions for improving the delivery of this information.**<sup>7</sup> In an ideal setting, the representatives would like for the Department to provide guidance to colleges. If necessary, allow colleges to personalize the language with the Department’s final approval. After approval is granted, the college would then be responsible for drafting an action plan to convey the information to students. According to the representatives, this approach would allow each institution to convey and disseminate the information in a format best suited for its college and population. However, if a Department-approved action plan is not possible; the representatives provided several other suggestions for enhancing the current language:

- Lead with a sentence specifically referring the standards of student loan borrowing, instead of stating that the program has not passed an undefined standard.
- Include the word “warning” in the first sentence.
- Clarify the language – “It says ‘the program has not passed standards’ but then says ‘if in the future the program does not pass standards’ – that is confusing.”
- Make the language as simple as possible. Some institutions have students taking more than one remedial class and representatives are concerned about those students’ ability to read and understand this language.
- Provide a timeframe for the warning to aid students in their decision-making process.

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<sup>7</sup> During the focus group, representatives were not made aware of the specific notification requirements in the GE regulations.

# Summary of Disclosure Rankings and Recommendations

# 4

In this section, we summarize the results of the disclosure rankings by category, first indicating the most important disclosure item for each category. This is followed by rankings for subitems, if options are provided, and then by the highest ranked among all the 10 items. The second section includes recommendations for possible revisions to the student warning language and disclosure definitions, followed by recommendations for possible additional consumer testing based on the focus group findings and the regulations.

## 4.1 Summary of Participant Rankings by Category

### 4.1.1 Student Debt (Students Receiving Title IV/Private Loans, Median Loan Debt, Loan Repayment Rate, and Program Default Rate)

The most important disclosure item for student debt was **loan repayment rate**.

- Within the loan repayment rate item, participants in both groups indicated loan repayment rate for students who *completed* the program was most important.
- Among the median loan debt subitems, the most important one was students who *completed* the program during the most recently completed award year.

### 4.1.2 Program Success (Completion and Withdrawal Rates)

The most important disclosure item for program success was **completion rates for full-time and part-time students** as compared to withdrawal rates.

- All participants preferred rates for *full-time students who completed within 100 percent* of the program length.
  - The second most important rate was for *full-time students who completed within 200 percent* (students) or *150 percent* (institutional representatives) of program length.

- There was no clear agreement between the two groups about the most important completion rate for **part-time students**.
  - Students were evenly divided between 100 and 200 percent of program length.
  - Institutional representatives preferred rates within 150 percent of program length.
- Similarly, there was not agreement between the two groups about the most important withdrawal rate.
  - Students preferred rates for those who withdrew from the program within 100 percent of the program length.
  - Institutional representatives preferred rates for students who withdrew from the program within 150 percent of the program length.

### 4.1.3 Program Outcomes (Job Placement Rates, Mean or Median Earnings, Annual Earnings Rate)

The most important disclosure item for program outcomes was **job placement rate**, followed by *mean or median earnings*.

- For job placement rate, students were evenly split between preferring a rate for the *program* and for the *program and the institution*. The three institutional representatives who completed the ranking sheet preferred placement rate for the *program*.
- The majority of the participants selected *mean* over median earnings.<sup>8</sup>
- Among the mean earnings subitems, the majority of participants preferred students who *completed the program* during the cohort period.

## 4.2 Overall Disclosure Rankings

Among the 10 disclosure items, participants ranked the following as most important: **job placement rate, annual earnings rate, and completion rates**.

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<sup>8</sup> However, as mentioned in the report, it was clear that the students were equally confused by the definition of the terms mean and median. Representatives suggested that whichever term is used, it is critical to provide a clear, user-friendly definition with examples.

## 4.3 Suggested Changes to Student Warning Language and Disclosure Definitions

As described in the report, institutional representatives made the following observations about the student warning language, for which we have offered a few changes in response:

- Representatives indicated that most students will not understand this language. They said students will read the first sentence and interpret it as the school is going to close because of the poor quality of its program.
- Some representatives also thought the warning language related to the amount of debt students do not repay as opposed to the debt-to-earnings ratio.
  - One possible suggestion to address these concerns is to slightly change the first sentence so that it reads: “This program has not passed the U.S. Department of Education’s standards for students borrowing funds to enroll in this program compared to their potential earnings. The Department based these standards on the amounts students borrow for enrollment in this program and their reported earnings. If in the future the program does not pass the standards, students who are then enrolled may not be able to use federal student grants or loans to pay for the program, and may have to find other ways, such as private loans, to pay for the program.”
- In disseminating the warning language to current and prospective students, is there anything in the regulations that precludes institutions from also requesting students call or make an appointment with an institutional representative for the purpose of discussing what the warning language means and the students’ options?

Although not part of the student warning language, it is important to note that students and representatives indicated explicitly or implicitly that the following terminology should be clearly defined with examples and/or explanations to help students and institutions understand these important concepts:

- Credit hours
- Contact hours
- Mean and median
- Full-time students
- Part-time students
- Default rate
- Title IV loans
- Private loans

- Cohort
- 100 percent, 150 percent, 200 percent and 300 percent of program length
- Job placement rate

## **4.4 Recommendations for Usability Testing**

Section 3 of this report discussed the challenges students experienced in understanding most of the disclosure items: they misinterpreted the meaning of the items, did not understand how they would use them, and/or did not identify with the concepts (e.g., “What does somebody else not paying back their loans have to do with you?” Institutional representatives concurred that it would be difficult for many of their students, who are not financially literate, struggle with reading comprehension, and sometimes have few basic math skills, to understand most of the items. Therefore, a logical next step is for the Department to consider usability testing of both the comprehensibility and accessibility of the disclosure items on institutions’ websites, performed by the students for which they are intended. We have consulted with one of Westat’s usability experts to draft the following recommendations.

### **4.4.1 Usability Testing**

The GE regulations require institutions to “provide a prominent, readily accessible, clear, conspicuous, and direct link to the disclosure template for the program” on various web pages, and to “modify” its website if the Department determines that the required link is not “prominent, readily accessible, clear, conspicuous, and direct.” The purpose of the first round of usability testing is to explore with prospective students what works well on existing sites and what issues there might be that could be incorporated into the second phase of testing. For example, is it possible to identify best practices for labeling GE requirements and placing them conspicuously on websites to help students locate and understand the information once they find it?

#### **4.4.1.1 Phase 1 Testing.**

Westat could conduct an environmental scan by reviewing a range of relevant existing GE templates on institutions’ websites. This process would entail the following:

- Reviewing these websites to identify the main approaches or structures used to present the current GE information, terminology, labels, etc. (e.g., Q&A format, outline, laundry list, decentralized).
- Selecting a small group (four to five) of representative websites.
- Recruiting prospective students and conducting usability testing (one student per session) with the example websites by using both self-directed and standard tasks. Examples of each type of task:
  - Self-directed task questions—What would you want to know about this program when visiting the site? Show me how you would look for that information. How easy or difficult was it to locate? Was the information where you expected it to be, or not? Why?
  - Standard task question—You are interested in \_\_\_\_\_[program] at this institution. You heard that many students who finish the program have a hard time finding a job. How would you use this site to find out how many students have gotten jobs after finishing?

Based on the results of phase 1 testing, we could develop guidelines and mockups for phase 2 testing.

#### **4.4.1.2 Phase 2 Testing**

The guidelines from phase 1 would be incorporated into a few mockups of website pages for phase 2 testing. The guidelines could cover the best approaches to locating and presenting the information, what labels might be used to help students find the information on the site, what terminology works best for students, what types of features, notes, or visuals might be helpful for interpreting the information, etc. Again, we would incorporate both self-directed and standard tasks into testing these mockups with prospective students. Based on the phase 2 testing results, we would refine the guidelines that the Department could review and revise, as necessary, to share with institutions to help them develop their website sections to meet the requirements.

## **Appendix A**

### **List of Disclosure Items Discussed in Focus Groups**



## List of Gainful Employment Disclosure Items Discussed in the Focus Groups

### Program Information

1. The length of the program in calendar time (i.e., weeks, months, years), and the number of contact or credit hours or equivalent, as applicable, in the program

### Student Debt

2. Of the individuals enrolled in the program during the most recently completed award year, the percentage who received a Title IV loan or a private loan for enrollment in the program:
  - Percentage who received a Title IV loan
  - Percentage who received a private loan
  - Percentage who received either a Title IV or private loan
3. Median loan debt (*calculated by ED*) for any one or all of the following groups:
  - Students who completed the program during the most recently completed award year
  - Students who withdrew from the program during the most recently completed award year
  - All of the students who completed and withdrew from the program during the most recently completed award year
4. Loan repayment rate (*calculated by ED using formula in regulations*) for any one or all of the following groups of students who entered repayment on Title IV loans during the two-year cohort period:
  - All students who enrolled in the program
  - Students who completed the program
  - Students who withdrew from the program
5. Program cohort default rate (*calculated by ED*)

## Program Success

6. Completion rates (*calculated by ED*) for number of students in appropriate cohort that:
  - Completed within 100% of the length of the program for *full-time* students
  - Completed within 100% of the length of the program for *part-time* students
  - Completed within 150% of the length of the program for *full-time* students
  - Completed within 150% of the length of the program for *part-time* students
  - Completed within 200% of the length of the program for *full-time* students
  - Completed within 200% of the length of the program for *part-time* students
  - Completed within 300% of the length of the program for *full-time* students
  - Completed within 300% of the length of the program for *part-time* students
  
7. Withdrawal rates (*calculated by ED*), for each enrollment cohort
  - Percentage of students who withdrew from program within 100 percent of the length of the program
  - Percent of students who withdrew from the program within 150 percent of the length of the program

## Program Outcomes

8. The job placement rate for the program, if the institution is required by its accrediting agency or State to calculate a placement rate using the required methodology of that accrediting agency or State.
  - Placement rate for program
  - Placement rate for institution
  - Placement rate for the program and the institution
  
9. Mean or median earnings (*calculated by ED using the methodology described in the regulations*) for *any one or all* of the following groups:
  - Students who completed the program during the cohort period used by ED to calculate the most recent debt/earnings debt-to-earnings rates for the program
  - Students who were in withdrawn status at the end of the cohort period used by ED to calculate the most recent debt-to-earnings rates for the program
  - All of the students who completed the program or were in withdrawn status
  
10. Annual earnings rate (*calculated by ED using the methodology described in the regulations*)

## **Appendix B-1**

### **Student Gainful Employment Moderator Guide**



**Westat Moderator's Guide**  
**NCES 2015 Gainful Employment Focus Group**  
**For Students Enrolled In Proprietary Schools**  
**and Community Colleges**

Revised January 11, 2015

**Welcome**

Good evening. My name is \_\_\_\_\_ and I am a researcher at Westat. I will moderate tonight's focus group. Thank you for taking time to participate. First, let me remind you that your participation in this focus group is voluntary. If you choose to participate, the information you provide will be confidential in that we will not include your name or the name of your school in our study report.

Now, let me tell you about the purpose of this study.

Westat, a social science research company in Rockville, MD, is working with the U.S. Department of Education on a project to help schools provide better information to current and prospective students about their career and training programs that lead to a certificate. Schools that offer Gainful Employment (GE) programs are required to provide specific information about their programs on their web sites. Most of tonight's focus group will focus on reviewing and discussing information related to what may be provided on school websites in the future. To help with the discussion, we have drafts that display sample information that would appear on the websites.

Therefore, the Department of Education would like to hear from students, like you, to determine if this information is clear and easy to understand before finalizing the information displayed on websites. We would also like to know which pieces of information are most important to you.

The information you share in this group will be summarized in a report and shared with the Department of Education's Office of Postsecondary Education. It will be used by the Department to help students make informed decisions about programs and schools before and during enrollment.

## **Focus Group Guidelines**

1. There are no right or wrong answers. We value a variety of opinions and experiences.
2. Please talk one at a time.
3. Talk in a voice as loud as mine.
4. Avoid side conversations with your neighbors.
5. I need to hear from everyone; however, you do not have to answer every question.
6. It is OK to piggyback on someone else's comments.
7. Work for equal "air time" so that no one talks too little or too much.
8. Information shared in the group will remain confidential; the report will only summarize the responses and will not identify you by name or school. Help us protect your confidentiality by only stating your first name and NOT mentioning the name of your school.
9. Please do not share the information discussed with anyone outside of the group until all the data have been collected and the websites are finalized by the Department of Education, which will not occur until 2017. *[Get verbal agreement from everyone.]*
10. Staff from the Department of Education and Westat are observing and taking notes on the discussion behind the one-way mirror and the session will be audio recorded.
11. Please turn off or silence your cell phones. Please, refrain from texting or checking email during the focus group.

**Any questions before we begin?**

## I. Warm-Up and Opening Questions

OK, let's get started by going around the table and introducing ourselves.

1. Please give your **first name only** and tell me:
  - A. What career or vocational program of study you are currently enrolled in, and
  - B. How long you've been enrolled in the program.

Please do **not** share the name of the institution you are attending or your last name.

Now, let's begin by talking about how your current program and school.

1. How did you first learn about this program?

*PROBE to learn if it was based on a prior job, course work in high school, a person who told them about it, or something they read.*

2. How did you learn which colleges or schools were offering this program?

3. What in particular made you choose the program at the school you currently attend?

*PROBE if not mentioned:*

- *type of career or vocational program or certificate offered*
- *cost*
- *geographic location*
- *length of program*
- *reputation of school (PROBE on how determined?)*
- *job placement (services, record?)*

- 4a. Looking back, was there information you wished you had known about the **school** before you enrolled? If so, what? How would you have used this information?

Thank you very much. For the remainder of the discussion, we will focus our attention on reviewing draft screen shots of information that may be presented on school websites. I will ask you specific questions about each of the items in the screen shots. At the end of each section, you will be asked to rank them.

For purposes of our discussion, let's assume that all schools that offer gainful employment programs would be required to provide some or most of this information on their college web sites.

Please note that we will be using a made up example for our discussion. The information and data used in the example are not real.

## **II. Program Information**

***CLICK TO BEGIN SLIDE SHOW***

**First let's look at the area labeled "program length." Take a moment to review the slide.**

- 1. In our example, it says the program takes 12 months to complete. It also says that the program has 32 credit hours.**
2. What does the number of credit hours mean to you?
3. What is more helpful to you: the number of credit hours in the program, or the number of months it takes to complete?
4. How important is the information about program length to you? (Very important, important, somewhat important, not important) Why?

### III. Student Debt

***CLICK TO ADVANCE SLIDE***

Now let's look at the information on the slide "**Students Receiving Loans.**" Take a moment to review this slide.

5. Please look at the part of the example where it says 77% of students enrolled in 2014-2015 received a Title IV **or** private loan.

A Title IV loan is a loan through the federal government. A private loan is through a company or organization.

- 5a. How important is it to you to see what percentages of students received:

- (1) a Title IV (federal) loan
- (2) a private loan, or
- (3) either a Title IV or private loan?

Of these three options, which is most important to see? Why?

- 5b. How would you use this information?

***CLICK TO ADVANCE SLIDE***

Now look at the slide that is titled "**median loan debt.**" Take a moment to review this slide.

Median loan debt refers to the loan debt amount in the middle of the student loan distribution. That is, if you lined up – in order - the loan amounts of all students who enrolled in the program, the median would be the middle point of this line. This is different than the average, where you add up all the loan amounts and divide by the number of students.

The median loan debt shows you the 'middle amount' of loan debt for all students in the program – about half of students have loan amounts lower than this, and about half have loan amounts higher than this.

- 6a. You might have noticed that the example in the gray box focuses on students who **completed** the program.

*Moderator note: point out/explain the three columns.*

If instead the example said, “median loan debt for students who **withdrew from the program,**” is this information: as important, more important, or less important to you than the loan debt for students who **completed** the program? Why?

***CLICK TO ADVANCE SLIDE***

**Please flip over the PINK piece of paper. On this sheet, you will see the items we just talked about and saw on screen. In the section labeled ‘A, median loan debt,’ please which of these items is most important or useful to you.**

***CLICK TO ADVANCE SLIDE***

Moving to the next slide titled “**Loan Repayment Rate,**” please take a moment to review.

6. How important is it to see loan repayment rates broken down to
- (1) Students who completed the program
  - (2) Students who withdrew from the program
  - (3) Students who enrolled in the program

Which is most useful?

7. How important is information on loan repayment to you? (Very important, important, somewhat important, not important)
8. What, if anything, does this information tell you?

*PROBE on whether it says something about the institution or program of study, or if they perceive it says something about the student*

***CLICK TO ADVANCE SLIDE***

**Ok, back to the [PINK] handout. Please take a moment to select in B which of these loan repayment rate items is most important or useful to you.**

***CLICK TO ADVANCE SLIDE***

**Now here is a slide on the “Program Default Rate.” Please take a moment to review.**

9. Show of hands. Who would say they understand what it means when a student defaults on student loans?
  
- 11a. For those of you who raised your hands, can you please explain what you think it means?

*Note: Default means when students fail to make payments on loans for an extended period of time*

10. Now that you know what default means, in the example, it says that 11% of students who left or completed this program have defaulted on their student loans. What does that tell you?

*[PROBE if not mentioned on what it says about cost of the program and/or ability to find a decent paying job after leaving/completing the program]*

11. Would you use the information about the program default rate in your decision-making about enrolling in a specific program of study or institution? How would you use it?

***CLICK TO ADVANCE SLIDE***

**Now, I want everyone to think about all four of the items we discussed that relate to student debt: loan repayment; percentage of students receiving loans; median loan debt; and program default rate. Turn over the GREEN piece of paper. On this one, I would like you to rank, in order of importance, with 1 being most important, the order in which these different items are important or useful to you.**

**Okay, please pass all the green handouts forward.**

***CLICK TO ADVANCE SLIDE***

## IV. Program Success

Now take a moment to review the next slide, “Program Completion.”

12. In our example, it says that 60% of full-time and 0% of part-time **students who enrolled in the program in 2012-2013 finished within 1 years.**

14a. Could someone interpret what this means in their own words?

*PROBE to ensure students understand this was within 100% of program length; differences between FT and PT students*

13. What are some ways you might use this information when thinking about a program of study or institution?

15a. How important is this information? (Very important, important, somewhat important, not important)

14. In our example, you also see a table. This table has the breakdown of current completion rates for all students who enrolled in the program in 2012-2013, including full-time and part-time students.

16a. How helpful is it to see time to completion compared between full-time and part-time students?

***CLICK TO CIRCLE THE 80%***

16b. It shows that 80% of **part-time students** who enrolled in the program in 2012–2013 completed the program within 2 years.

*What does this mean to you? [PROBE to ensure students understand this means 50% of students completed the program in 200% of the program length)*

***CLICK TO CIRCLE THE TIMES TO COMPLETION***

16c. There are four different times to completion listed. If you had to choose only two of these time periods as information to provide to prospective students, which would you choose? Why?

1 year (100%); 1.5 year (150%); 2 years (200%); or 3 years (300%)?

***CLICK TO ADVANCE SLIDE***

**Back to the PINK handout. For the item labeled “C”, please select 2 different times to completion for full-time students AND for the item labeled “D”, please select 2 different times to completion for part-time that are most important to you.**

***CLICK TO ADVANCE SLIDE***

**Now please review this slide on “Withdrawal Rates.”**

15. In our example, it says that 5% of all students who enrolled in 2012-2013 withdrew from the program within 12 months. It also says that 10% of students withdrew from the program within 18 months.

17a. When you think about the withdrawal rate, what does that mean to you?

16. What is the difference between the two withdrawal rates?

18a. Is it helpful to see more than one rate? What makes you say that?

18b. How important is the withdrawal rate to you? Is it as important, less important or more important than the completion rate? What makes you say that?

***CLICK TO ADVANCE SLIDE***

**Now, can everyone take a moment to mark on their PINK handout under the section labeled “E (withdrawal rate)” which of these two measures is most useful or important to you?**

***CLICK TO ADVANCE SLIDE***

**Now, I want everyone to think about both of the items we discussed that relate to program success: completion rates and withdrawal rates. Now, please take out the [PURPLE] handout. On this one, I would like you to rank, in order of importance, with 1 being most important, the order in which these two items are important or useful to you.**

**Please pass the PURPLE handout forward when you are finished.**

***CLICK TO ADVANCE SLIDE***

## V. Program Outcomes

Now, take a look at the next slide titled “Job Placement Rates.” Please take a moment to read it.

***CLICK TO UNDERLINE PROGRAM***

17. This item in our example states that the job placement rate for the **program** is 55%. What does placement rate for the program mean to you?

19a. What are some ways you might use this information when thinking about a program of study?

***CLICK TO UNDERLINE INSTITUTION***

18. In our example, it says the job placement rate for **the institution** is 68%.

20a. What differences do you see between this job placement rate for the program and the placement rate for the institution?

*PROBE for institution v. program; lower rate*

20b. What are some reasons the program might have a lower rate than the institution as a whole?

19. If you had to choose, would you say it is more important to know about the job placement rate for the program or the institution?

21a. What are some reasons for that choice?

21b. How would you use the job placement rate information?

***CLICK TO ADVANCE SLIDE***

**[Ranking exercise #1] Please look at your [PINK] handout again, under section “F – Job Placement”. Mark your selection for which job placement rate is most useful.**

***CLICK TO ADVANCE SLIDE***

Please take a minute to review this slide on “Mean Earnings.”

20. In our example under mean and median earnings, it says that the mean earnings for all students who enrolled in the program in 2014–2015 and completed the program was \$45,037.

Mean earnings are the **average** earnings of students who completed the program. This means we would add up the earnings of all students and divide by the number of students.

Median earnings refers to the mid-point in the distribution (arc) of earnings. If we put each salary in order in a line, it would be the middle salary, where half were above and half below. This makes the earnings less susceptible to small numbers of students who make far, far above most students (say, \$150,000) – or far, far, below most students (say, \$0), which would skew the average.

- 22a. Now that we’ve discussed the difference in mean and median earnings, if you had to select one to be displayed on the website, which would you choose?

21. In our example under mean and median earnings, it says that the mean earnings for all students who enrolled in the program and completed or withdrew in 2014–2015 was \$43,214.

- 23a. How important is it to see the mean earnings that include both students who withdrew and who completed the program?

- 23b. Would you rather see the earnings between these two groups (those who completed and those who withdrew) broken down separately, or as they are presented in the example circled in red on the screen?

22. How might you use information on mean or median earnings in thinking about a program of study or college?

***CLICK TO ADVANCE SLIDE***

**Please take a look at sections G and H on the PINK handout make a selection again regarding which items are most useful and important to you.**

***CLICK TO ADVANCE SLIDE***

**Please take a moment to review this slide titled “Annual Earnings Rate.”**

23. In our example on this slide, it shows that among students who completed the program in 2014–2015, their annual earnings rate is 6.5%.

25a. What does ‘annual earnings rate’ mean to you?

Annual earnings rate is the annual loan payment divided by the higher of the mean or median annual income. It is a ratio of what you owe versus what you make.

24. How might you use information on annual earnings rate in thinking about a program of study or college?

25. How important is information on annual earnings rate to you?

***CLICK TO ADVANCE SLIDE***

**Now, please look at the [BLUE] handout. Thinking about the three items under program outcomes (job placement rate, mean or median earnings, annual earnings rate), please rank these in order of importance.**

**Please pass the BLUE handout forward when you have finished.**

***CLICK TO ADVANCE SLIDE***

## **VI. Ranking Exercise**

**Thinking across all the concepts and information we discussed, I want you to consider what would most affect your decision whether or not to enroll in a specific program. Please use the YELLOW handout to put these items in order, from 1 – most important to 10 – least important.**

- **When you are finished with this handout, you can flip it over and leave the yellow and pink handouts on the table.**

## **VII. Close**

26. Are there any other suggestions or topics we have not discussed about information you would like to know before enrolling in a school or program that you would like to bring up now?

### **False Close [If time]**

Thank you so much for being here tonight. Before we conclude, I need to step out for a few minutes to make sure we have everything ready for you.

*[Moderator checks with observers for up to two additional questions to pose, time permitting.]*

### **Final Close**

*[Upon return, moderator will pose questions from observers, if any.]*

This concludes our discussion for tonight. Again, thank you so much for taking time out of your very busy lives to be here with us tonight. The facility has your envelope ready for you. Please enjoy the rest of your evening and travel home safely.



## **Appendix B-2**

### **Student Gainful Employment Slides**



# Gainful Employment Student Focus Group

# Program Length

## PROGRAM LENGTH

**Q:** How long will it take me to complete this program?

**A:** The program is designed to take **12 months** to complete.

The program consists of **32 credit hours**.

# Students Receiving Loans

## PERCENTAGE OF STUDENTS RECEIVING LOANS

**Q:** What financing options are available to help me pay for this program?

**A:** Financing for this program may be available through grants, scholarships, loans (federal and private) and institutional financing plans.

In 2014-15:

60% of students received a Title IV loan

25% of students received a private loan

77% of students received either a Title IV or private loan

# Median Loan Debt

## MEDIAN DEBT

**Q:** How much debt will I be in when I finish the program?

**A:** The **median amount of debt** for students who completed the program is shown below:

**Title IV loans:** \$5,000

**Private education loans:** \$3,500

**Overall Median Debt (includes both Title IV and private loans):** \$8,000

	Completed	Withdrew	Completed or Withdrew
Federal Student Loans (Title IV)	\$6,000	\$3,500	\$5,000
Private Loans	\$3,500	\$1,500	\$3,000
Overall Median Loan Debt	\$8,000	\$4,500	\$7,000

# PINK HANDOUT: A

Check one of the three items for median loan debt that is most important to you:

- Students who **completed** the program during the most recently completed award year
- Students who **withdrew** from the program during the most recently completed award year
- All of the students who completed **and** withdrew from the program during the most recently completed award year

# Loan Repayment Rate

## LOAN REPAYMENT RATE

**Q: Will I be able to pay back my loans?**

**A:** Our student loan repayment rates in 2014-2015 were as follows:

80% of students who **completed** the program made payments on their Title IV loans.

80% of students who **withdrew from** the program made payments on their Title IV loans.

80% of students who **enrolled in** the program made payments on their Title IV loans.

# PINK HANDOUT: B

Check one of the three loan repayment rates that is most important to you:

- All students who **enrolled** in the program
- Students who **completed** the program
- Students who **withdrew** from the program

# Loan Default Rate

## LOAN DEFAULT RATE

**Q:** Do most students pay back their loans?

**A:** In 2014-2015, 11% of students who completed or left the program defaulted on their loans.

# GREEN HANDOUT - Student Debt

**Directions:** Think about what matters to you when choosing a program of study or college. Please rank items A–D in order of importance or usefulness to you, with 1 being most important.

\_\_\_\_\_ **A. Loan repayment rate**

\_\_\_\_\_ **B. Percentage of students who received a Title IV loan or a private loan for enrollment in the program**

\_\_\_\_\_ **C. Median loan debt**

\_\_\_\_\_ **D. Program default rate**

# Program Completion

## PROGRAM COMPLETION

**Q:** How long will it take me to complete the program?

**A:** Among full-time students who enrolled in 2013-2014, 60% finished in 1 year.

Among part-time students who enrolled in 2013-13, 0% finished in 1 year.

*\*Note: program length is 1 year.*

Time to Completion	Full-Time Students	Part-Time Students
1 year (100%)	60%	0%
1.5 years (150%)	70%	45%
2 years (200%)	90%	80%
3 years (300%)	92%	85%

# PINK HANDOUT: C and D

Completion rates for FULL-TIME STUDENTS and PART-TIME STUDENTS

Check TWO (2) of the four completion rates that are most important to you

# Withdrawal Rates

## WITHDRAWAL RATES

**Q:** Do most students complete the program?

**A:** Among students who enrolled in 2012-2013, 5% of students withdrew within 12 months of beginning the program.

10% of students withdrew within 18 months of beginning the program.

# PINK HANDOUT: E

- Check one of the two withdrawal rates that is most important to you:
  - ❑ Percentage of students who withdrew from program within 100% of the program length
  - ❑ Percent of students who withdrew from the program within 150% of the program length

# PURPLE HANDOUT – Program Success

**Directions:** Think about what matters to you when choosing a program of study or college. Please rank items A–B in order of importance or usefulness to you, with 1 being most important.

\_\_\_\_\_ **A. Completion rates— full-time students and part-time students**

\_\_\_\_\_ **B. Withdrawal rates, for each enrollment cohort**

# Job Placement Rates

## JOB PLACEMENT RATE

**Q:** What are my chances of getting a job when I graduate?

**A:** In 2014-2015, the job placement rate for this program was 55%.

The job placement rate for this institution was 68%.

# PINK HANDOUT: F

Check one of the **three** placement rates you think is most meaningful or useful to you.

- Placement rate for the **program**
- Placement rate for the **institution**
- Placement rates for the program **and** the institution

# Mean Earnings

## MEAN OR MEDIAN INCOME

**Q:** How much money will I make after I graduate?

**A:** The mean earnings for students who enrolled in the program in 2014-2015 and completed the program was **\$45,037**.

The mean earnings for students who enrolled in the program in 2014-2015 and who withdrew from the program was **\$36,890**.

The mean earnings for students who enrolled in the program in 2014-2015 and completed or withdrew was **\$43,214**.

## PINK HANDOUT: G

Check one of the two based on whether you find “mean” or “median” earnings easier to understand:

- Mean earnings
- Median earnings

## PINK HANDOUT: H

Check one of the three mean or median earnings that is most important to you:

- Students who **completed** the program during the cohort period
- Students who were in **withdrawn status** at the end of the cohort period
- All of the students who completed the program **or** were in withdrawn status

# Annual Earnings Rate

## ANNUAL EARNINGS RATE

**Q:** Is the investment in my education worth it financially?

**A:** The annual earnings rate for students who completed the program in 2014-2015 was 6.5%

# BLUE HANDOUT: Program Outcomes

**Directions:** Think about what matters to you when choosing a program of study or college. Please rank items A–B in order of importance or usefulness to you, with 1 being most important.

\_\_\_\_\_ **A. Job placement rate**

\_\_\_\_\_ **B. Mean or median earnings**

\_\_\_\_\_ **C. Annual earnings rate**

# **YELLOW HANDOUT** – Overall Ranking of All Data Elements

**Instructions:** Think about our discussion today of the types of information that matter to you as a student when you are choosing a program of study or college.

**Please put each of the items below in order of importance, from 1 (most important) to 10 (least important) in relation to the question ‘how important is this information in helping me to choose a program of study or college?’**



## **Appendix C-1**

# **Institutional Representative Gainful Employment Moderator Guide**



**Westat Moderator's Guide**  
**NCES Gainful Employment Focus Group**  
**For Institutional Representatives From Proprietary Schools and**  
**Community Colleges In the DC Metropolitan Area**

**Revised January 11, 2016**

**Welcome & Intro to the Study** *[10 minutes]*

Good evening. My name is Denise and I am a researcher at Westat, a social science research company in Rockville, MD. I will moderate tonight's focus group. Thank you for taking time to participate. First, let me remind you that your participation in this focus group is voluntary. If you choose to participate, the information you provide will be confidential in that we will not include your name or the name of your school in the study report.

Now, let me tell you about the purpose of this study.

**Introduction to the Study**

U.S. Department of Education has contracted with Westat to work on a project related to the Gainful Employment regulations that will take effect January 1, 2017. Under these regulations that were issued in October 2014, postsecondary institutions like yours are required to disclose to current and prospective students information about their institution's career and training certificate programs through a disclosure template developed by the Department. Please note that the Department will provide some of the information while institutions are responsible for collecting and providing other information.

This evening's discussion will focus on two issues. First, we will discuss the GE data elements to solicit your general perspectives about whether you think additional information needs to be provided to help institutions collect and provide this information, and students understand the information to help them make informed decisions about which institutions to enroll in. As part of this discussion, we would like you to rank the relative

importance of each item by identifying those that you deem most critical to collect and enter into an updated GE template.

Second, we will ask you to respond to the student warning language contained in the regulations that institutions are required to provide under certain conditions.

The information you share in this group will be summarized in a report and shared with the Department of Education's Office of Postsecondary Education. This information will help the Department decide which items should be included in the 2017 GE template. The new disclosure requirements are effective January 1, 2017.

### **Focus Group Guidelines**

1. There are no right or wrong answers. We value a variety of opinions and experiences.
2. Please talk one at a time.
3. Talk in a voice as loud as mine.
4. Avoid side conversations with your neighbors.
5. I need to hear from everyone; however, you do not have to answer every question.
6. It is OK to piggyback on someone else's comments.
7. Work for equal "air time" so that no one talks too little or too much.
8. Information shared in the group will remain confidential; the report will only summarize the responses and will not identify you by name or school. Help us protect your confidentiality by only stating your first name and **NOT** mentioning the name of your school.
9. We request that you not share the information discussed with anyone outside of the group until all the data have been collected and the web pages are finalized by the Department of Education, which will not occur until 2017. *[Get verbal agreement from everyone.]*

10. Staff from Westat are observing and taking notes on the discussion behind the one-way mirror. The session will be audio recorded.
11. Please turn off all mobile devices or turn them to vibrate.
12. Finally, I apologize if I need to end a discussion abruptly so I can move on to the next topic. We have a lot to cover this evening.

**Are there any questions before we begin?**

## **I. Warm-Up and Opening Questions [7 minutes]**

OK, let's get started by going around the table and introducing ourselves. Please give your **first name only** and tell me your official job title and how long you've worked at your institution. **Please do NOT mention the name of your school or your last name.**

**First, let's talk a little about your data-related tasks at your institution, and information about your institution's website.**

1. Do you work with IPEDS data for your school?
  - Do you work with compliance issues for participating in federal financial aid programs? If so, what are your primary responsibilities? (*Probe on coordinating data to submit to the Department, collecting data from the school, reporting on the data, using the data.*)
2. Do you coordinate or submit data on your school to agencies or organizations other than the Department of Education?
  - If so, what types of organizations or agencies?
3. To the best of your knowledge, what types of Gainful Employment (GE) information are currently available to students on your institution's website? (*Probe on description of programs, courses offered, length of program, cost of program, job placement rate*)

**Thank you. For the remainder of the discussion, we will focus our attention on reviewing the data elements included in the Gainful Employment regulations. As I mentioned earlier, these regulations issued by the Department of Education in October 2014 require institutions to provide specific information to current and prospective students about their certificate programs (and on all programs if you are a for-profit institution). This focus group provides one among several opportunities for the institutions affected by these requirements to give the Department feedback about the data elements and student warning language. I will ask you specific questions about each of the items on the screen that relate to the information institutions will collect and provide as well as information that the Department will calculate. On the screen, you'll see these items appear in two separate columns.**

*[Moderator, click to advance slide]*

## **II. Program Information** *[5 minutes]*

**First, let's talk about the items under Program Information.**

4. The first item is **“program length in calendar time (i.e., weeks, months, years).”**
  - 4a. How important do you think this information is to students? Say more about why you think it's important or not?
  - 4b. Let's summarize by a show of hands in response to this question. Do you think it's very important, important, somewhat important, or not important for students to have this information?
5. Now, let's look at the **number of clock or credit hours or equivalent, as applicable, in the program.**
  - 5a. How many of you use clock hours? How many use credit hours? How many use something different such as contact hours?
  - 5b. Do you think students understand the difference between clock and credit hours? What would make it easier to understand? How important is this information to students?

*[Moderator, click to advance slide]*

### III. Program Costs *[7 minutes]*

Now let's move on to Program Costs, which include tuition and fees, and books, supplies, and equipment.

6. In looking at **tuition and fees**:
  - 6a. Does your institution typically charge tuition to students for the entire program, term-to-term, or by academic year? Could I see a show of hands for this question, also? How many charge for the entire program? How many charge term-to-term? How many charge by academic year?
  - 6b. Do you include books and supplies as part of your tuition or do you break it out separately? How many charge it as part of your tuition?
  - 6c. Do you include equipment as part of your supplies or break it out separately? How many of you include equipment as part of your supplies?

*[Moderator, click to advance slide]*

### IV. Student Debt *[17 minutes]*

Now let's talk about Student Debt. The regulations say institutions are to provide the following—Take a moment to read the slide:

***DO NOT READ ALOUD: Of students who enrolled in the program during the most recently completed award year, the percentage who received: (a) a Title IV loan for enrollment in the program, (b) a private loan, or (c) either a Title IV or private loan.***

- 7a. Is it clear to you what institutions are being asked to provide here?
- 7b. How do you think they might use this information? How important do you think this information is to students?
- 7c. Can you estimate the person-hours required for your office to provide this information?

*[Moderator, click to advance slide]*

**The next set of data elements related to student debt is all calculated by the Department. They are: loan repayment rate, median loan debt, and program level cohort default rate**

The language from the regulations is provided on these slides. Please take a moment to read the slide on loan repayment rate.

**Loan repayment rate. *The Dept. will calculate loan repayment rate for any one or all of the following groups of students who entered repayment on Title IV loans for: (a) all students who enrolled in the program, (b) students who completed the program, and/or (c) students who withdrew from the program.***

- 8a. Which group(s) do you think students would find most helpful -- I'd like a show of hands for this: (a) loan repayment rate for all enrolled students only, (b) loan repayment rate for program completers only, and/or (c) the loan repayment rate for students who withdrew from the program only? What makes you say that?
- 8b. How many of you would respond that you think students would find it most helpful to have information on two or all three of the loan repayment rates? Which two?
- 8b. How do you think students might use this information?

*[Moderator, click to advance slide]*

**Now, let's look at median loan debt. Please take a few moments to read the slide.**

***DO NOT READ ALOUD: The regulations indicate that the median loan debt will be calculated for any one or all of the following groups: (a) students who completed the program during the most recently completed award year, (b) students who withdrew from the program during the most recently completed award year, and/or (c) students who completed and withdrew from the program during the most recently completed award year.***

- 9a. Do you think students understand what a median is? *[If they don't think students would know, ask:)]* Any suggestions on what might help students understand what a median is?

- 9b. Do you think students would prefer to see median loan debt rate for: (a) students who completed the program, (b) students who withdrew from the program, or (c) a single rate for those students who completed **and** withdrew? Say more about this.
- 9c. How important do you think this information is to students?

*[Moderator, click to advance slide]*

10. Now let's briefly discuss the **program level cohort default rate**, which is also calculated by the Department.

- 10a. Do you think students understand what this rate means? Compared to the median loan debt and the loan repayment rate, how important do you think the program level cohort default rate is for students?

## V. Program Success *[10 minutes]*

The next set of questions on program success is also calculated by the Department.

*[Moderator, click to advance slide]*

There are several measures of completion and withdrawal rates ranging for 100% of the program length for full time and part time students to 300% of program length for full-time and part-time students. Let's talk about completion rates first.

11. From your perspective, do you think some **completion rates** are more critical than others to report for *full time students* completing GE programs (i.e., 100% of program length, 150% of program length, 200% of program length, and 300% of program length)?
- 11a. What makes you say this?
- 11b. If you could put yourself in the shoes of a *full-time student*, which one or two of the four rates would be most important to *you*? What makes you say that?

- 11c. Do you think students think some completion rates are more important than others to report for *part-time students*? Which ones? Why?

*[Moderator, click to advance slide]*

12. Thinking about *withdrawal rates*, do you think both rates (i.e., 100% and 150%) are equally important to report for *full-time students*? Why?
- 12a. From your perspective, do you think both rates are equally important to report for *part-time students*? Why?
- 12b. From the student's perspective, do you think they would consider both withdrawal rates equally important to report for *full-time students*? What about part-time students?
- 12c. Do you think students would have a better understanding of completion rates, or withdrawal rates, or are these rates equally understood by students? Please tell me more about your response.

*[Moderator, click to advance slide]*

## VI. Program Employment *[12 minutes]*

Now let's move to the last category, Program Employment. The first data element is placement rate. Please take a moment to read the slide.

***DO NOT READ ALOUD: The regulations explain that institutions must provide a placement rate, if the institution is required by its accrediting agency or State to calculate a placement rate either for: (a) the program, or (b) the institution, or (c) both, using the required methodology of that accrediting agency or State.***

- 13a. Do you know how the accrediting agency or your State defines job placement rates? If so, do you recall the definitions?
- 13b. Do you know how your institution tracks job placement of your graduates? How? (*Probe on alumni surveys, state data systems, etc.*)
- 13c. How easy or difficult would you say it would be/is to collect job placement information on your graduates?

13d. Can you estimate person-hours required to collect this information for the Department? [If having difficulty, does it make sense to think about this in the context of a 40-hour work week?]

13e. How important is this information to students?

*[Moderator, click to advance slide]*

**Finally, please read this slide also under Program Employment.**

***DO NOT READ ALOUD: The GE regulations indicate that the Department will calculate students' mean or median earnings for any one or all of the following students groups: (a) those who completed the program during the cohort period used by the Department to calculate the most recent debt to earnings rates for the program, (b) those who were in withdrawn status at the end of the cohort period or (c) all who completed the program or were in withdrawn status.***

14a. Do you think students have a better understanding of mean earnings or median earnings? What makes you say that?

14b. Which one of the mean or median earnings rates would be easier for students to understand:

- rates for students who completed the program,
- rates for students who withdrew from the program, or
- a single rate for students who both completed and withdrew from the program?
- Could I have a show of hands for each, please? Please say more about your response.

15. Think about all the items we've discussed thus far. What do you think is the overall institutional burden associated with collecting new items to comply with these GE regulations for all relevant programs at your institution?

These are the requirements we've discussed: program length, # of clock/credit/contact hours; tuition and fees; books, supplies, and equipment;

percentage of students who receive Title IV loans or private loans, and placement rate. (Percentage of time? Heavy, medium, low?)

- 15a. *Probe on coordinating with other offices.* What percentage of this time do you estimate is spent coordinating with other offices to collect this information?

## **VII: Ranking Exercises #1 & #2 [7 minutes]**

*[Moderator, click to advance slide to instructions for Exercise #1]*

*[Exercise #1—ranking sub-elements]:* Now, you will complete several ranking exercises based on the items we just discussed. First, please turn over the **green** sheet that says at the top, “Exercise #1 (sub-elements).” For each of the sets of GE items, identify *one* from each set that you think is *most important to students*. Place only one check within each set of items, EXCEPT for items 3 and 4, where you’ll identify two items. You should have 10 checks in total after you’re finished. Any questions? I’ll give you a few minutes to complete this. When you’re finished, please turn the exercise over.

Now we’ll move on to Exercises #2 *[Moderator, click to advance slide to instructions for Exercise #2]*

*[Exercise #2—ranking within main data elements]:* Now, please turn over the **blue** sheet that says at the top, “Exercise #2, Group Ranking.” This time, you will order the main data elements within each GROUP (there are 3 groups—Student Debt, Program Success, and Program Employment). So, for example, under the first group of student debt, there are four primary sets of data elements. Please order them based on their importance to students, with 1 being the most important. Please do not use the same number twice. Any questions

## **VIII: Student Warning Language [7 minutes]**

Let’s spend the final minutes briefly discussing the **student warning language** before doing our final ranking exercise.

**Moderator reads: Under the regulations, if a GE program could become ineligible based on its final debt-to-earnings rates calculated by the Department for the next award year, the institution must provide warnings to both current and prospective students.**

*[Moderator, click to advance slide]*

**Please read this slide with the exact student warning language:**

**(DO NOT READ ALOUD)**

***“This program has not passed standards established by the U.S. Department of Education. The Department based these standards on the amounts students borrow for enrollment in this program and their reported earnings. If in the future the program does not pass the standards, students who are then enrolled may not be able to use federal student grants or loans to pay for the program, and may have to find other ways, such as private loans, to pay for the program.”***

16. What is your initial reaction to this language?

16a. What, if any, questions do you have about it?

16b. If you had the option, would you change any of the language? What would you change? How would you change it? Why would you change it?

16c. How do you think students would react to this language?

*[Moderator, click to advance slide to instructions for Exercise #3]*

**IX. Exercise #3 [5 minutes]**

*[Exercise #3—Overall ranking of main data elements]:*

Now for the last exercise, please turn over the **pink** sheets that say at the top, Exercise #3, (Overall) . In this final exercise, please order the relative importance of each of the 10 data elements with 1 being the most important and 10 being least important. Please order all 10 of the overall key elements, but do not use the same number twice. Please note that we have excluded some data elements (e.g., program length, tuition and fees, enrollment, etc.) because they are already being collected or they will be collected. Any questions?

*[SHOW LAST SLIDE, If time], ask:*

*[3 minutes]*

17. Are there any other suggestions or topics we have not discussed about the GE items that you would like to bring up now?

**Thank you. This has been a very useful discussion. We appreciate your time and assistance. Excuse me while I go back. [As time allows, check to see if anyone has any final questions.] .....**

*Pass out incentives and letter to institutions.*

## **Appendix C-2**

### **Institutional Representative Gainful Employment Slides**





# **Gainful Employment Focus Group Institutional Representatives**

**January 13, 2016**

# Program Information

<b>Provided by Institution</b>	<b>Calculated by Department of Education</b>
Program length in calendar time	
Number of clock or credit hours (or equivalent)	

# Program Costs

“The total cost that the student would incur for completing the program within the length of the program.”

<b>Provided by Institution</b>	<b>Calculated by Department of Education</b>
Tuition and fees	
Books, supplies and equipment	

# Student Debt

“Of students who enrolled in the program during the most recently completed award year, the percentage who received: (a) a Title IV loan for enrollment in the program, (b) a private loan, or (c) either a Title IV or private loan.”

<b>Provided by Institution</b>	<b>Calculated by Department of Education</b>
Percentage of students receiving Title IV loan or private loan	Loan repayment rate  Median loan debt  Program level cohort default rate

## Student Debt: Loan Repayment Rate

Loan repayment for any one or all of the following groups of students who entered repayment on Title IV loans for:

- (a) all students who enrolled in the program,
- (b) students who completed the program, and/or
- (c) students who withdrew from the program.

# Student Debt: Median Loan Debt

Median loan debt calculated for any one or all of the following groups:

- (a) students who completed the program during the most recently completed award year,
- (b) students who withdrew from the program during the most recently completed award year, and/or
- (c) students who completed **and** withdrew from the program during the most recently completed award year.

**Table I. Median Loan Debt**

	Completed	Withdrew	Completed or Withdrew
<b>Federal Student Loans</b>	\$6,000	\$3,500	\$5,000
<b>Private Loans</b>	\$3,500	\$1,500	\$3,000
<b>Overall Median Loan Debt</b>	\$8,000	\$4,500	\$7,000

# **Student Debt: Program Level Cohort Default Rate**

Calculated by the U.S. Department of Education

# Program Success

Completion rates for full-time and part-time students

<b>Provided by Institution</b>	<b>Calculated by Department of Education</b>
	Completion rates for full-time students (100%, 150%, 200%, 300%)  Completion rates for part-time students (100%, 150%, 200%, 300%)

# Program Success (continued)

Withdrawal rates for full-time and part-time students

<b>Provided by Institution</b>	<b>Calculated by Department of Education</b>
	Withdrawal rates (100%, 150%)

# Program Employment

Placement rate, if the institution is required by its accrediting agency or state to calculate a placement rate either for:

- (a) the program, or
- (b) the institution, or
- (c) both, using required methodology of that accrediting agency or State.

<b>Provided by Institution</b>	<b>Calculated by Department of Education</b>
Placement rate for the program (if required by accrediting agency or State to calculate placement for the program or the institution or both)	

## Program Employment (continued)

The Department will calculate students' mean or median earnings for any one or all of the following student groups:

- (a) those who completed the program during the cohort period used by the Department to calculate the most recent debt to earnings rates for the program,
- (b) those who withdrew from the program at the end of the cohort period, and/or
- (c) all students who completed or who withdrew from the program

<b>Provided by Institution</b>	<b>Calculated by Department of Education</b>
	Mean or median earnings

# Exercise #1 (Green sheet)

## GE Sub-elements

- For each of the sets of GE items, identify *one* from each set that you think is *most important to students*.
- Place only one check within each set of items, **EXCEPT** for items 3 and 4, where you'll identify **TWO** items.
- You should have **10** checks in total after you're finished.

## **Exercise #2 (Blue sheet)**

### **Group Rankings – Student Debt, Student Success, and Program Employment**

- **Order the main data elements within each GROUP (there are 3 sets of groups—Student Debt, Program Success, and Program Employment).**
- **For example, under the first group of student debt, there are four primary sets of data elements. Please order them based on their importance to students, with 1 being the most important.**

## Student Warning Language

“This program has not passed standards established by the U.S. Department of Education. The Department based these standards on the amounts students borrow for enrollment in this program and their reported earnings. If in the future the program does not pass the standards, students who are then enrolled may not be able to use federal student grants or loans to pay for the program, and may have to find other ways, such as private loans, to pay for the program.”

## Exercise #3 (Yellow sheet)

### Overall Rankings

- Order the relative importance of each of the 10 data elements with 1 being the most important.
- Order all 10 of the overall key elements, but do not use the same number twice.
- Note that we have excluded some data elements (e.g., program length, tuition and fees, enrollment, etc.) because they are already being collected or they will be collected.

**Other questions or  
suggestions?**

## **Appendix D-1**

### **First/Ongoing Exercise for Students**



# Student GE Focus Group

## First/Ongoing Exercise

**Instructions:** As we go through the focus group, we will periodically pause the discussion and the moderator will ask you to make a selection under each of these lettered sections. In each of these sections, please think about which item is most important or useful to you as a student when thinking about selecting a program of study or college.

Please only place one check within each set of items, **EXCEPT** for items C and D.

### A. Median loan debt

Check one of the three items for median loan debt that is most important to you:

- Students who **completed** the program during the most recently completed award year
- Students who **withdrew** from the program during the most recently completed award year
- All of the students who completed **and** withdrew from the program during the most recently completed award year

### B. Loan repayment rate

Check one of the three loan repayment rates that is most important to you:

- All students who **enrolled** in the program
- Students who **completed** the program
- Students who **withdrew** from the program

### C. Completion rates for FULL-TIME STUDENTS

Check TWO (2) of the four completion rates that are most important to you:

- Completed within 100% of the length of the program for **full-time** students
- Completed within 150% of the length of the program for **full-time** students
- Completed within 200% of the length of the program for **full-time** students
- Completed within 300% of the length of the program for **full-time** students

**D. Completion rates for **PART-TIME STUDENTS****

Check **TWO (2)** of the four completion rates that are most important to you:

- Completed within 100% of the length of the program for **part-time** students
- Completed within 150% of the length of the program for **part-time** students
- Completed within 200% of the length of the program for **part-time** students
- Completed within 300% of the length of the program for **part-time** students

**E. Withdrawal rates**

Check **one** of the two withdrawal rates that is most important to you:

- Percentage of students who withdrew from program within 100% of the program length
- Percent of students who withdrew from the program within 150% of the program length

**F. Job placement rate**

Check **one** of the three placement rates you think is most meaningful or useful to you.

- Placement rate for the **program**
- Placement rate for the **institution**
- Placement rates for the program **and** the institution

**G. Mean or median earnings**

Check **one** of the two based on whether you find “**mean**” or “**median**” earnings easier to understand:

- Mean earnings
- Median earnings

**H. Mean or median earnings**

Check **one** of the three mean or median earnings that is **most important to you**:

- Students who **completed** the program during the cohort period
- Students who were in **withdrawn status** at the end of the cohort period
- All of the students who completed the program **or** were in withdrawn status

## **Appendix D-2**

### **Exercise #1 for Institutional Representatives**



# Institutional Representatives GE Focus Group

## Exercise #1 (Sub-elements)

**Instructions:** For each of the six sets of GE items please identify **one from each set** that you think is **most important to students**. Please only place one check within each set of items, **EXCEPT** for items 3 and 4.

- 1. Loan repayment rate (calculated by ED)** Calculated for any one or all of the following groups of students who entered repayment on Title IV loans during the two-year cohort period.

**Check one of the three** loan repayment rates you think is **most important to students**:

- All students who **enrolled** in the program
- Students who **completed** the program
- Students who **withdrew** from the program

- 2. Median loan debt (calculated by ED).** Calculated for *any one or all* of the following groups:

**Check one of the three** items for median loan debt you think is **most important to students**:

- Students who **completed** the program during the most recently completed award year
- Students who **withdrew** from the program during the most recently completed award year
- All of the students who completed **and** withdrew from the program during the most recently completed award year

- 3. Completion rates (calculated by ED) for number of students in appropriate cohort for FULL-TIME STUDENTS**

**Check TWO (2) of the four** completion rates you think is **most important to students**:

- Completed within 100% of the length of the program for **full-time** students
- Completed within 150% of the length of the program for **full-time** students
- Completed within 200% of the length of the program for **full-time** students
- Completed within 300% of the length of the program for **full-time** students

- 4. Completion rates (calculated by ED) for number of students in appropriate cohort for PART-TIME STUDENTS**

**Check TWO (2) of the four** completion rates you think is **most important to students**:

- \_\_\_ Completed within 100% of the length of the program for **part-time** students
- \_\_\_ Completed within 150% of the length of the program for **part-time** students
- \_\_\_ Completed within 200% of the length of the program for **part-time** students
- \_\_\_ Completed within 300% of the length of the program for **part-time** students

**5. Withdrawal rates (calculated by ED), for each enrollment cohort**

**Check one of the two** withdrawal rates you think is **most important to students**:

- \_\_\_ Percentage of students who withdrew from program within 100% of the program length
- \_\_\_ Percent of students who withdrew from the program within 150% of the program length

**6. Mean or median earnings (calculated by ED)**

**Check one of the two** based on whether you think “**mean**” or “**median**” earnings is easier for students to understand:

- \_\_\_ Mean earnings
- \_\_\_ Median earnings

**6a. Mean or median earnings (calculated by ED)**

**Check one of the three** mean or median earnings you think is **most important to students**

- \_\_\_ Students who **completed** the program during the cohort period used by ED to calculate D/E rates
- \_\_\_ Students who were in **withdrawn status** at the end of the cohort period used by ED to calculate D/E
- \_\_\_ All of the students who completed the program **or** were in withdrawn status

**7. Placement rate for the program (Provided by Institution)** (if institution is required by its accrediting agency or State to calculate a placement rate)/ **Check one of three.**

- \_\_\_ Placement rate for the **program**
- \_\_\_ Placement rate for the **institution**
- \_\_\_ Placement rates for the program **and** the institution

## **Appendix E-1**

### **Student Exercises 2, 3 and 4**



# Student GE Focus Group

## Exercise 2 - Student Debt

**Directions:** Think about what matters to you when choosing a program of study or college. Please rank items A–D in order of importance or usefulness to you, with 1 being most important. Although many of these items have different options underneath them, please consider the option you selected as ‘most helpful’ in the last exercise when thinking about the item.

\_\_\_\_\_ **A. Loan repayment rate**

All students who enrolled in the program  
Students who completed the program  
Students who withdrew from the program

\_\_\_\_\_ **B. Percentage of students who received a Title IV loan or a private loan for enrollment in the program**

Percentage who received a Title IV loan  
Percentage who received a private loan  
Percentage who received either a Title IV or private loan

\_\_\_\_\_ **C. Median loan debt**

Students who completed the program during the most recently completed award year  
Students who withdrew from the program during the most recently completed award year  
All of the students who completed and withdrew from the program during the most recently completed award year

\_\_\_\_\_ **D. Program loan default rate**

## Exercise 3 - Program Success

**Directions:** Think about what matters to you when choosing a program of study or college. Please rank items A–B in order of importance or usefulness to you, with 1 being most important. Although many of these items have different options underneath them, please consider the option you selected as ‘most helpful’ in the last exercise when thinking about the item.

\_\_\_\_\_ **A. Completion rates—Full time students & Part time students**

Completion rates for number of students in appropriate cohort that:

Completed within 100% of the length of the program for full-time students

Completed within 150% of the length of the program for full-time students

Completed within 200% of the length of the program for full-time students

Completed within 300% of the length of the program for full-time students

Completion rates for number of students in appropriate cohort that:

Completed within 100% of the length of the program for part-time students

Completed within 150% of the length of the program for part-time students

Completed within 200% of the length of the program for part-time students

Completed within 300% of the length of the program for part-time students

\_\_\_\_\_ **B. Withdrawal rates**

Percentage of students who withdrew from program within 100% of the length of the program

Percent of students who withdrew from the program within 150% of the length of the program

## Exercise 4 - Program Outcomes

**Directions:** Think about what matters to you when choosing a program of study or college. Please rank items A–D in order of importance or usefulness to you, with 1 being most important. Although many of these items have different options underneath them, please consider the option you selected as ‘most helpful’ in the last exercise when thinking about the item.

\_\_\_\_\_ **A. Placement rate**

Placement rate for program

Placement rate for institution

\_\_\_\_\_ **B. Mean or median earnings**

Students who *completed* the program during the cohort period

Students who were in *withdrawn* status at the end of the cohort period

All of the students who completed the program or were in withdrawn status

\_\_\_\_\_ **C. Annual earnings rate**



## **Appendix E-2**

### **Exercise #2, Group Ranking for Institutional Representatives**



# Institutional Representatives GE Focus Group

## Exercise #2

### Group Ranking – Student Debt

**Instructions:** Please rank items A – D in order of importance or usefulness to students, with 1 being most important and 4 being least important

\_\_\_\_\_ **A. Loan repayment rate** Calculated for any one or all of the following groups of students who entered repayment on Title IV loans during the two-year cohort period (**ED Calculates**):

- All students who enrolled in the program
- Students who completed the program
- Students who withdrew from the program

\_\_\_\_\_ **B. Percentage of students who received a Title IV loan or a private loan for enrollment in the program—(Institution Provides)**

- Percentage who received a Title IV loan
- Percentage who received a private loan
- Percentage who received either a Title IV or private loan

\_\_\_\_\_ **C. Median loan debt (Calculated by ED)**

- Students who completed the program during the most recently completed award year
- Students who withdrew from the program during the most recently completed award year
- All of the students who completed and withdrew from the program during the most recently completed award year

\_\_\_\_\_ **D. Program cohort default rate (Calculated by ED)**

## Group Ranking – Program Success

**Instructions:** Please rank items A – B in **order of importance or usefulness to students**, with **1 being most important**.

\_\_\_\_ **A. Completion Rates (Calculated by ED)—Full Time Students & Part time students**

Completion rates (calculated by ED) for number of students in appropriate cohort that:  
Completed within 100% of the length of the program for full-time students  
Completed within 150% of the length of the program for full-time students  
Completed within 200% of the length of the program for full-time students  
Completed within 300% of the length of the program for full-time students  
Completion rates (calculated by ED) for number of students in appropriate cohort that:  
Completed within 100% of the length of the program for part-time students  
Completed within 150% of the length of the program for part-time students  
Completed within 200% of the length of the program for part-time students  
Completed within 300% of the length of the program for part-time students

\_\_\_\_ **B. Withdrawal rates (calculated by ED), for each enrollment cohort**

Percentage of students who withdrew from program within 100% of the length of the program  
Percent of students who withdrew from the program within 150% of the length of the program

## Group Ranking – Program Employment

**Instructions:** Please rank items A – C in **order of importance or usefulness to students**, with **1 being most important**.

\_\_\_\_ **A. Placement Rate**

The placement rate for the program, if the institution is required by its accrediting agency or State to calculate a placement rate *either* for the program *or* the institution *or both*, using the required methodology of that accrediting agency or State.  
Placement rate for program and/or placement rate for institution

\_\_\_\_ **B. Mean or median earnings (Calculated by ED)**

Students who completed the program during the cohort period used by ED to calculate the most recent debt/earnings (D/E) rates for the program  
Students who were in withdrawn status at the end of the cohort period used by ED to calculate the most recent D/E rates for the program  
All of the students who completed the program or were in withdrawn status

\_\_\_\_ **C. Annual earnings rate (Calculated by ED)**

## **Appendix F-1**

### **Final Exercise for Students**



# Student GE Focus Group

## Final Exercise

**Instructions:** Think about our discussion today of the types of information that matter to you as a student when you are choosing a program of study or college.

**Please rank each of the items below in order of importance, from 1 (most important) to 10 (least important) in relation to the question ‘how important is this information in helping me to choose a program of study or college?’**

Please note that some items are excluded because they are currently being collected or will be collected such as program length, program costs, enrollment, and whether the program is accredited.

- \_\_\_\_\_ **Number of credit hours** or clock hours in the program
- \_\_\_\_\_ **Loan repayment rate** (calculated for all students who enrolled, completed or withdrew from the program who entered repayment on Title IV loans during the two-year cohort period)
- \_\_\_\_\_ **Percentage of students who received a Title IV loan or a private loan**
- \_\_\_\_\_ **Median loan debt**
- \_\_\_\_\_ **Program loan default rate**
- \_\_\_\_\_ **Completion rates—full-time and part-time students**
- \_\_\_\_\_ **Withdrawal rates**
- \_\_\_\_\_ **Job placement rate**
- \_\_\_\_\_ **Mean or median earnings**
- \_\_\_\_\_ **Annual earnings rate**



## **Appendix F-2**

### **Exercise #3, Overall Ranking for Institutional Representatives**



# **Institutional Representatives GE Focus Group**

## **Exercise #3 (Overall)**

**Instructions:** For each of the 10 Gainful Employment (GE) items below, please order their **importance to students** from 1 (most important) to 10 (least important). (Please note that some GE items are excluded because they are currently being collected or will be collected (e.g., program length, program costs, enrollment, whether program is accredited).

\_\_\_ **Number of clock or credit hours** or equivalent in the program

\_\_\_ **Loan repayment rate** (Calculated for all students who enrolled, completed or withdrew from the program who entered repayment on Title IV loans during the two-year cohort period **(ED Calculates)**)

\_\_\_ **Percentage of students who received a Title IV loan or a private loan** **(Institution Provides)**

\_\_\_ **Median loan debt** **(Calculated by ED)**

\_\_\_ **Program cohort default rate** **(Calculated by ED)**

\_\_\_ **Completion Rates** **(Calculated by ED)—Full Time and Part-Time Students**

\_\_\_ **Withdrawal rates** **(Calculated by ED)**

\_\_\_ **Placement rate for the program**, if the institution is required by its accrediting agency or State to calculate a placement rate

\_\_\_ **Mean or median earnings** **(Calculated by ED)**

\_\_\_ **Annual earnings rate** **(Calculated by ED)**