

Compliant Communications with Students

Raising the bar in regulatory compliance and customer service

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In one of my previous columns I discussed how educational institutions are creating a compliance culture within their organizations. This discussion prompted many questions from readers about an online compliance training course that MaxKnowledge has developed in partnership with the National Association of State Administrators and Supervisors of Private Schools (NASASPS). Based on the questions that I've received, I am focusing this column on the learning objectives of the NASASPS compliance course.

Raising the Bar - Compliant Communications with Students is designed for employees of all roles and levels at private sector institutions that participate in federal financial aid programs. The course covers those aspects of federal and state regulations that address compliant communications with students. Course participants can select specific state(s) to customize the training content to their needs.

The online course has four modules and each module takes about one hour to complete. The learning objectives for each module were developed in consultation with compliance executives and analysts at several career education institutions. I have outlined the established learning objectives below.

Module 1: Doing the Right Thing

- Gain understanding of risks associated with non-compliance of regulations.
- Attain awareness of Program Integrity regulations effective July 1, 2011.
- Increase insight to state-level requirements driven by federal regulations.
- Ensure understanding of Do-Not-Call guidelines and penalties.
- Gain knowledge of guidelines, risks, and penalties related to the CAN-SPAM Act.

Module 2: Prospective Student Interactions

- Gain knowledge of specific guidelines regarding recruitment activities.
- Gain understanding of restrictions specific to referencing job placement.
- Gain insight to restrictions related to program expectations and outcomes.
- Attain knowledge of specific inducements and conduct considered to be inappropriate.
- Ensure understanding of additional areas of potential misrepresentation under scrutiny by federal and/or state agencies.

Module 3: Institution Activities

- Identify relevant state agencies with oversight of higher education institutions for consumer protection.
- Gain knowledge of specific rules regarding advertising and marketing.
- Attain insight into practices that ensure competitive integrity.
- Gain understanding of the numerous disclosure requirements schools must provide.
- Obtain insight into requirements related to catalogs, websites, and other publications.

Module 4: The Human Factor

- Obtain understanding of general experience and qualifications required for specific positions, as well as prohibited backgrounds.
- Gain insight into the licensing and training requirements of key positions and guidelines regarding titles of certain positions.
- Obtain insight into certain duties and responsibilities which require separation to avoid conflict of interest.
- Obtain understanding of compensation limitations related to specific positions, particularly related to the elimination of the federal safe harbors.
- Identify a summary of ethical standards and guidelines for employees within the higher education sector.

The course is delivered in an asynchronous fashion with the support of a compliance training facilitator who is available to coach the learning process and answer questions through the course's discussion forums. The course also includes Avatar-based scenarios, and other activities and assessments to reinforce learning. The recommended time for completion of the course is four weeks (one module per week).

My discussions with regulatory agencies have confirmed that EVERY employee can put an institution at risk by choosing to say or do the wrong thing. So it is important to remember that compliance training is not just for admissions and financial aid personnel, but for all associates. And, when training is done properly, employees will realize that compliance is the result of providing truthful communications, transparent disclosures and exceptional customer service to students.

Dr. Moghadam is the founder and CEO of MaxKnowledge, the leading employee training company for the career college sector of higher education. He has over 20 years of experience in career education, serving in many capacities including professor, director of education, academic dean, director of student affairs, campus director, college president and owner. Moghadam earned his PhD in Engineering from the University of Cambridge at the age of 22. He is a recognized leader in career education and has been selected as a Top Innovator by the Career College Central magazine. Moghadam can be reached at amirm@maxknowledge.com.