Enrollment Management Report

Practical Guidance in Recruitment, Admissions, Retention & Financial Aid

SNAPSHOTS

IDEA FILE

Review a 'Dear Colleague Letter' on providing excellent service to students with military benefits; demonstrate that students can complete degrees in three years; review federal data on enrollment numbers and costs; and more. **Page 2**

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COVER STORY

Prepare students for a successful transfer with CollegeFish.org

Whether you work at a two-year or a four-year institution, it's important to support transfer students.

CollegeFish.org is a great tool to assist with advising as students choose transfer destinations and plan their course schedules so that they are ready for their majors.

And it gives four-year institutions a way to reach potential transfer students and keep them up to date on deadlines.

The site has been available to Phi Theta Kappa students for years, but now an improved version is being offered to all students at participating community colleges in five pilot states. **Full story, see pages 4–5.**

> **Support transfers through stages**
>
> Transfer students pass through four stages as they make their transition. Learn how to help at every step. **See page 4.**

HIGHLIGHTS

Recognize red flags for financial aid fraud rings

If multiple students who apply for financial aid list the same address or phone number, your institution might be the target of a fraud ring. Learn how you can recognize and prevent student aid scams. **Page 3**

Create a plan to manage students with criminal records

If you admit students with criminal records, you need a fair, consistent process to assess the risk they pose to reduce your institution's liability. You also need to be ready to address students' off-campus misconduct. **Pages 6–7**

Promote first-generation students' success

Retaining first-generation students requires cross-campus efforts. Advocate for best practices that can make your institution more successful in helping these vulnerable students complete their degrees. **Page 8**

Support transfer students with comprehensive efforts

Charlene A. Stinard, director of transfer and transition services at the University of Central Florida, leads a small office that handles 75,000 contacts a year. Find out how she helps transfer students make a smooth transition on a budget. **Page 12**

Review 'Dear Colleague Letter' on serving service members, veterans

An Executive Order signed by President Obama in April outlines ways institutions can support students who receive military education benefits. The ED issued a "Dear Colleague Letter" explaining how officials can comply with Executive Order 13607, Establishing Principles of Excellence for Educational Institutions Serving Service Members, Spouses, and Other Family Members.

The guidance covers disclosing costs, providing financial aid information, offering students receiving military benefits a single point of contact at the institution, and more.

You can find the guidance at *http://www.ifap.ed.gov/dpcletters/GEN1210.html*. ∎

Encourage students to consider ways to complete degrees in 3 years

Offering options that help students complete their degrees in shorter amounts of time could help them accumulate less debt.

An Ohio law requires that public institutions create plans for how students can complete at least 10 percent of their programs within three years, reports the *Dayton Daily News*. The plans are due by October this year.

By 2014, institutions must provide plans for completing 60 percent of their programs in three years.

However, officials from universities in the state stressed that completing degrees in three years is not the best solution for all students. ∎

Understand proposed regulations that ease student loan discharge

The Department of Education has proposed new regulations concerning federal student loans. They apply to income-contingent repayment of loans and make it easier for borrowers with total and permanent disabilities to have student loans discharged.

Among other provisions, the proposed rules enable loan forgiveness after 20 years rather than 25 if borrowers make payments under an income-contingent repayment plan.

And borrowers with disabilities would be able to request a discharge of all loans with one application.

Review the Notice of Proposed Rulemaking at *www.gpo.gov/fdsys/pkg/FR-2012-07-17/pdf/2012-15888.pdf*. ∎

Consider enrollment trends revealed by IPEDS data

Nationwide data about enrollment numbers and costs can help you benchmark your institution's efforts.

Recently released figures from the Integrated Postsecondary Education Data System concern costs and enrollment in recent academic years.

Review *Postsecondary Institutions and Price of Attendance in 2011–12*; *Degrees and Other Awards Conferred: 2010–11*; and *12-Month Enrollment: 2010–11* released by the National Center for Education Statistics' Institute for Education Statistics, at *http://nces.ed.gov/pubs2012/2012289.pdf*. ∎

ENROLLMENT MANAGEMENT REPORT

Prevent financial aid scams at your institution

Between 2005 and 2011, the Office of the Inspector General investigated 42 student aid fraud rings. Those rings illegally collected millions of dollars in aid.

Knowing how to spot fraud rings can help your institution prevent them from acting or shut them down.

In a typical scam, individuals apply for federal financial aid with no intention of participating in courses or completing a program, said Helen Benjamin, chancellor of the Contra Costa Community College District in California. She spoke at the American Association of Community Colleges annual convention.

Benjamin's institution was the target of a fraud ring, and that experience showed her that the following measures can help prevent fraud:

➢ Ask instructors to monitor participation in classes that don't have regular meeting schedules and note students who do not attend.

➢ Require suspected students to provide additional verification for their aid, and ask them to provide it in person if possible.

➢ Delay the release of the first financial aid checks until after the beginning of classes.

➢ Spread the disbursement of aid over a longer time during the academic term and require faculty to confirm financial aid recipients' ongoing participation.

➢ Routinely check records to locate multiple aid recipients with the same address, phone number, IP address or other shared information.

➢ Become suspicious if multiple students use the same representative for financial aid interviews.

If you suspect fraud, notify the OIG, Benjamin said. At her institution, officials asked for permission to withhold checks when they suspected fraud. It was not granted. But they mailed the checks at a particular time, and police officers from the institution were present when they arrived at their destinations. The officers were able to confirm the fraud through their efforts.

Jean Runyon, dean of learning advancement at Anne Arundel Community College's virtual campus, has also seen financial aid fraud take place. With distance education, the anonymity of the Internet poses challenges, she said. "It's really about mitigating risks. We have to do everything we can to protect the integrity of programs but we have to do it with student success in mind," Runyon said.

Preventing fraud can't be the sole responsibility of the financial aid office, Runyon said. Faculty members need to know what to look for and students need to understand why the institution must follow certain procedures regarding aid.

Runyon's college does the following to prevent fraud:

✓ Requires faculty to take daily attendance.

Faculty who teach online note attendance weekly. And they define in advance what participation in the course consists of. Merely logging in is not sufficient.

✓ Assures that students who enter with loan debt but no transcripts are pursuing degrees. Many students fall into that category.

✓ Holds financial aid disbursement until after the last day of add/drop. That prevents students from collecting the funds and then dropping their courses.

✓ Tracks participation patterns. The student, instructor and dean are notified if a student has not logged into a class by the third day and again after the seventh day.

✓ Monitors withdrawal patterns. Students must complete a survey if they withdraw from an online course.

For more tips on how to prevent student aid fraud, see the American Association of Community Colleges' publication Preventing Abuse in Federal Student Aid: Community College Practices, *found at* www.aacc.nche.edu/Publications/Reports/Documents/Preventing_Abuse.pdf. *To report suspected aid fraud, go to* www2.ed.gov/about/offices/list/oig/index.html *and follow the link provided.* ∎

Pell program enables access

About 49 percent of first-time, full-time students at community colleges received Pell Grants last year, said Christopher Mullin, director of policy analysis at the American Association of Community Colleges. He spoke at the group's annual convention.

When college leaders advocate for keeping the program strong, they need to know the facts. Mullin explained the truth behind three common myths about Pell Grants:

• **Myth:** Pell Grants drive tuition increases.

Fact: Most economists find no clear link and see some indication that Pell Grants lower tuition.

• **Myth:** The Pell program is unsustainable.

Fact: Costs are projected to decline in fiscal year 2013 and then remain stable for the next 10 years.

• **Myth:** Waste, fraud and abuse are widespread, growing problems in the Pell program.

Fact: There is no evidence these occur often.

For more information about Pell Grants, visit http://studentaid.ed.gov/types/grants-scholarships/pell. *The Institute for College Access and Success provides resources on the Pell program at* http://ticas.org/pellgrant_resources.vp.html. *Resources are also available at* www.savepell.org. ∎

Prepare community college students to transfer with tools, resources from CollegeFish.org

Students who transfer need to plan carefully to ensure that their courses will count toward their degrees. And their transfer will go more smoothly if they have completed the prerequisites for their majors.

CollegeFish.org provides online tools to help community college students decide where to go next and to prepare for a successful transfer experience.

The tool was designed for students in Phi Theta Kappa, the honor society for two-year college students. But with funding from the Bill & Melinda Gates Foundation, it is being expanded and offered to students at all community colleges that choose to participate in five pilot states. The updated website launches in September, with services being offered in Alabama, Florida, Indiana, Kentucky and Washington.

CollegeFish.org benefits community colleges by providing a comprehensive advising tool. Before the economic downturn and enrollment surge at two-year institutions over the past few years, less than one-third of community college students spoke with a counselor, said Rod Risley, executive director of PTK.

"The percentage of students receiving essential advisement and support for college completion is even less today, thus CollegeFish.org is meeting a critical need in regard to degree completion at a time when credentials are often essential for jobs," Risley said.

Four-year institutions that sign on as partners can use CollegeFish.org to share information about what they offer. The system also provides them with contact information for students who express interest in their institution.

After students fill out a profile, CollegeFish.org suggests institutions they might want to attend. They can compare institutions on factors such as class size, said Jennifer Blalock, CollegeFish.org director.

They can also use calculator tools to determine how much a particular institution will cost. It might not occur to students that they will have to pay for parking or student IDs that might have been free at the community college, Blalock said. They also may not realize that books are likely to be more expensive for the junior and senior years, she said.

Students can save up to 10 institutions in their "fishbowl."

Once they have selected possible institutions,

> *'We give people hope. [CollegeFish.org] allows people to extend that hope beyond what they can do at a community college.'*
>
> — Ed Hughes, President and Chief Executive Officer, Gateway Community and Technical College

students can create a transfer success plan. They input courses they have taken and get feedback on what they need to take for particular majors. Transfer and articulation agreements that have been established between the two-year and four-year institutions are built into the system.

"Pell students have little room for error," Blalock said. Every course they take needs to be applicable to their degree, she added. And many community college students rely on the Pell program.

When students create their profiles, they include the dates they expect to transfer. The tool provides them with three steps at a time to achieve their goals. Once they complete those steps, they see new ones.

Four-year institutions can populate students' calendars with important dates. For example, if a student expresses interest in a particular university, that institution's application deadline and other key dates appear on the calendar. ■

Support transfer students through 4 stages

The process transfer students go through consists of four stages, said Jennifer Blalock, director of CollegeFish.org. Be sure your institution is ready to support them through these stages:

1. Search. Students at two-year institutions should start exploring their transfer options during their first semester of enrollment, Blalock said.

2. Choose. Students create academic and financial plans so they are ready for a smooth transition.

3. Secure. Students develop relationships that will help them succeed in their transfer goals. They identify professionals at their current and future institution who can answer their questions.

4. Succeed. Students learn to understand the culture at their new institution and identify the supports available to them. The same strategies that helped them navigate a two-year institution might not work at a university. For example, they might not be able to participate in six clubs, but joining one club can help them make the connections that will help them. ■

Learn advantages of a CollegeFish.org partnership

Members of Phi Theta Kappa, the honor society for community college students, have been enjoying the advantages of CollegeFish.org for years. This fall, all students at participating institutions in five states have access to the transfer-planning tool. Below is why institution officials are enthusiastic about the pilot.

Site supports strategic goals

In Kentucky, offering CollegeFish.org to all community college students supports the statewide goal of increasing the number of college graduates, said Ed Hughes, president and chief executive officer at Gateway Community and Technical College.

When Hughes heard about the CollegeFish.org pilot, he asked PTK officers at his college about the tools available and learned they were all using the service to plan their transfers. Once they gave him a tutorial, he was eager to offer CollegeFish.org to all students. Gateway is a young, quickly growing institution that has only recently begun to focus on preparing students for transfer, Hughes said.

In Kentucky as a whole, community colleges are the key to increasing college completion, Hughes said. The state's college-going rate and the value placed on higher education have been low, he said. But with a community college within a half-hour drive of anyone in the state, the colleges offer students a chance to get started. CollegeFish.org helps them keep going.

"We give people hope," Hughes said about the community college system. "This allows people to extend that hope beyond what they can do at a community college. That's pretty powerful stuff," he said.

System offers complete information

Many students make the decision about where to transfer based on one or two factors without considering the whole picture, said Cheryl Cephus-Vickers, dean for student services and director of counseling and advising at Gadsden State Community College. With CollegeFish.org, they can make choices based on more comprehensive data, she said.

Alabama colleges already use a program that provides transfer information about institutions in the state. CollegeFish.org will help students with choices in other states, she said.

Gadsden State will have an on-campus coordinator for CollegeFish.org efforts. Officials are planning an icon on the institution's homepage to take students to the website. They also hosted an information table about the new system at orientation sessions where they offered games and prizes to promote it. They also included information in new student packets.

New students take an orientation class, and information about how to use CollegeFish.org to plan a transfer is being added to that course, Cephus-Vickers said.

System provides new options

Heather Owen, director of recruitment and PTK advisor at Lurleen B. Wallace Community College in Alabama, has seen the positive results PTK students get from using CollegeFish.org for several years.

It gives students a way to find out about institutions outside the state and even outside the country that they might never have considered attending, she said. Many students don't have a plan for transfer when they enroll. CollegeFish.org helps them develop one so that they can get organized and transfer successfully, she said.

Students who have used it also liked that they received a lot of contact from the institutions they chose as possible transfer destinations. That made them feel welcome, Owen said.

Owen, who directs orientation, showed all new students how to use the system. She borrowed a banner promoting CollegeFish.org that she saw at the national PTK convention and displayed it at orientation to get students excited. Each student will have a log-in to use the service, Owen said.

She hopes that officials at four-year institutions will see the value of using CollegeFish.org as a recruitment tool. Publicizing scholarships available for transfer students would attract students, Owen added. ■

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Address applicants' criminal records during admission

Should an applicant's criminal record be a consideration in the admissions process? Your institution should determine a consistent way to answer that question before you make a decision about an individual applicant, said Kellie L. Brennan, director of student conduct at Columbus State Community College. She spoke at the annual conference of the Association for Student Conduct Administration.

A fair and consistent policy will help protect your institution from legal liability and safeguard your students. And if you plan to monitor certain students after they enroll, you need to have a plan for that too.

Applications don't necessarily have to ask about criminal backgrounds, and a criminal conviction doesn't necessarily preclude admission, Brennan said. But your institution should develop a policy regarding asking applicants about crime and what you'll do if they have a criminal record. If you ask, or become aware of their criminal background, you must systematically review the information, using a fair, consistent process to reduce liability, she said.

Because applicants sometimes lie, Brennan suggested background checks for all applicants. Charge the cost to applicants, your enrollment unit, the behavioral intervention team or student life. You could also collaborate with human resources to benefit from group rates or conduct free searches of public records and newspaper archives.

Ask applicants for personal narratives to help you decide if they're ready to transition from criminal to student, Brennan said. "What they say is very telling about their maturity level, acceptance of personal responsibility, and desire to move on," she said.

Implement review process

Brennan recommended a review process housed in student conduct, intentionally separate from admissions. Form a small, diverse review committee mirroring your threat assessment team. Include representatives from offices such as the dean of students, conduct, mental health and security—not academic deans, faculty or admissions, she said.

You should try to alleviate the fear that officials are trying to judge those with criminal records or keep them out, Brennan said. "We ask, 'What can we do to help you be successful?'"

But remember, students with certain criminal records wouldn't be able to fulfill several academic and certificate programs requiring a field component—such as teaching, social work or nursing. But it would be inappropriate to ban those students from courses that don't involve interaction with vulnerable populations if they pose no present danger, according to Corinne Kowpak, dean of students at York County Community College; and Barbara Lee, professor of human resource management at Rutgers University and an attorney at Edwards Angell Palmer & Dodge, LLP.

However, sex offenders' probation/parole restrictions often prevent enrollment, Brennan said. "You can't be a student without library or Internet access," she said. If they're not allowed unsupervised contact with people under 18, that also prevents them from being on campus because some students are underage, she said.

Collaborate with police

The Campus Sex Crimes Prevention Act requires registered sex offenders to notify local police, stating if they're college students/employees. The police must share the information with college safety offices. Colleges' annual security reports must also reveal where to find the information. And the Family Educational Rights and Privacy Act permits releasing registered sex offender information.

Under the CSCPA, "the campus police or security office has the responsibility to receive the information, ascertain whether the student poses a present risk to the campus community, and determine whether and how it will monitor the student's conduct," Lee and Kowpak said. Campus safety should consult with students' parole officers to determine any precautions and address safety issues, they said.

Decide whether to allow parolees or registered offenders in campus housing, cocurricular activities, or courses requiring interaction with vulnerable populations. Consider the nature and seriousness of their offenses, how long ago they occurred, age at the time, and if they're rehabilitated or if college is part of their rehabilitation efforts. Find out if they satisfied the court's orders, violated their probation or are repeat offenders.

Crimes carrying little to no risk for the campus community, such as misdemeanors and nonviolence, should lead to admission without restrictions, Brennan said. But interview violent offenders about how they spent time in prison and after their release, if anyone is after them, and if they're with the same crowd, Brennan suggested. You can deny or defer admission or admit with conditions or probation, she said.

"To remove even a hint of bias, the process should be as transparent as possible," Brennan said. Clearly state in writing the reasons for the denial, the appeals process, and if/when they can reapply, she said.

Contact Kellie L. Brennan at kbrenna1@cscc.edu. ■

Limit institution's liability with a written response plan for addressing off-campus misconduct

Not establishing an effective, written plan for handling students' off-campus arrests or misconduct — before they happen — could expose your campus community to some serious legal and safety ramifications. Make sure suspension and re-admission processes are part of the plan.

That's according to Corinne Kowpak, dean of students at York County Community College; and Barbara Lee, professor of human resource management at Rutgers University and an attorney at Edwards Angell Palmer & Dodge, LLP. They gave a presentation at the Annual Legal Issues in Higher Education Conference.

"As long as the college can articulate a reasonable relationship between the off-campus misconduct and the well-being of the college community, courts are unlikely to overturn a disciplinary action unless they find that it was arbitrary, an abuse of discretion, or a violation of students' constitutional rights," they said.

It's not unusual for students to challenge disciplinary actions. Limit your institution's exposure to liability by ensuring your conduct code expressly prohibits off-campus conduct affecting the well-being of the college community — and that misconduct can lead to disciplinary sanctions, they said. Vague or overbroad language risks being struck down by a court.

For example, *Woodis v. Westark Community College*, 160 F. 3d 435 (8th Cir. 1998), a nursing student who was expelled after pleading no contest to a charge of attempting to obtain a controlled substance with a forged prescription, claimed the code was unconstitutionally vague. A rule too vague for the average citizen to understand is open to a due process challenge because students can claim they were denied notice of the charges. That means public institutions must give students notice of the charges and the opportunity to be heard before receiving sanctions.

Because the conduct code at Westark Community College required students to "obey all federal, state, and local laws," the challenged language clearly gave students notice that violating the law is grounds for sanctions, the court held.

In *Ray v. Wilmington College*, 667 N.E.2d 39 (Ohio Ct. App. 1995), the authority of educational institutions to discipline its students "does not necessarily stop at the physical boundaries of the institution's premises," the judge stated.

Institutions have "the prerogative to decide that certain types of off-campus conduct [are] detrimental to the institution and to discipline a student who engages in that conduct," the judge added.

Conduct officers "must evaluate whether the off-campus act has a detrimental impact on the institution's educational functions," said Lee and Kowpak. When a student commits an off-campus sexual assault, it makes sense to suspect he could be an on-campus security risk, they said.

Similarly, hazing and drug offenses, even off campus, may threaten the college's educational environment, they added.

Consistently applying criteria for addressing off-campus misconduct and implementing a fair process for determining code violations and sanction types should help defend against challenges, they said.

Contact Barbara Lee at lee@smlr.rutgers.edu *or Corinne Kowpak at* ckowpak@yccc.edu. ■

Build relationships with legal counsel

The next time you face a challenge that has a legal component, look beyond your enrollment management unit for answers. In fact, you're likely to have a better outcome if you seek legal advice, according to Corinne Kowpak and Barbara Lee.

"Administrators who develop collegial working relationships with college counsel usually find that it helps deter or resolve problems," they said. Kowpak is the dean of students at York County Community College, and Lee is a professor of human resource management at Rutgers University and an attorney at Edwards Angell Palmer & Dodge, LLP.

But remember that college counsel typically represents the college, not individual administrators. "Attorneys are ethically bound to represent the institution, even if the institution's interests differ from the interests of a particular individual," they said.

Although attorneys "do not, or should not, make policy," they should determine policy goals and advise on potential legal implications, Lee and Kowpak said.

They also should ensure public college policies protect students' due process rights and private and public college policies comply with the student handbook and essential fairness. ■

Provide extensive support for first-generation students

First-generation students occupy a disadvantaged position in higher education due in large part to their inadequate college-related cultural capital.

Students with college-educated parents benefit in innumerable ways from a sense of the college experience, and the encouragement that often undergirds it, that is passed down to them. But many, if not all, first-generation students have little such knowledge and encouragement to support their transition into college.

All institutions seeking to promote the success of first-generation students would be wise to focus their immediate attention and resources on environments, programs and services that:

➢ **Increase faculty and staff knowledge concerning the circumstances and needs of first-generation students.** First-generation faculty, staff and upper-level students can serve as mentors or resources for first-generation students and provide role models for success on campus.

Also, encourage faculty to take a more active role in providing guidance to first-generation students concerning course selection and academic programs.

➢ **Develop a library of retention resources related to first-generation students, promote common readings for faculty and staff, and conduct forums and discussions.** It is also important to communicate national and local research, data and reports on first-generation students to institutional members.

The goal is to deepen the collective knowledge of faculty and staff about first-generation students.

➢ **Create a campus culture that understands and appreciates the differences between first-generation and non-first-generation students.** Instilling in first-generation students the importance of institutional norms, values and culture is a powerful method for forging an early bond between the institution and students that might influence them to get involved in campus life.

➢ **Provide targeted orientation programs for first-generation students.** These programs should focus on learning outcomes that ensure that a student's transition into the institution is productive and marked by preparation for the rigors of academic work and the complexity of the social environment.

➢ **Advise first-generation students in ways that allow them to understand the wide range of academic, experiential and career options.** Those options should include those to which they may have had little exposure or that they may not have been encouraged to pursue.

Because of inadequate college-related cultural capital, infrequent exposure in high school to anything but the most basic courses, and misunderstandings about the out-of-class environment in college, these students are often unaware of the broad range of educational and career-building options available to them.

➢ **Benchmark institutional efforts relative to first-generation students against those of peer institutions.** Consulting with other institutions prior to implementing a first-generation student initiative is an important step toward ensuring success in policy formation. It gives an idea of what works and what doesn't work in various institutional contexts.

Key questions to ask in considering a benchmarking study are:

• What institutions are your peers?

• How do they define retention for first-generation students?

• What are the principles under which their retention program operates?

• What has worked in the past, and what has not?

• What were the costs associated with their retention efforts?

• How did they make the case for the importance of aiming retention initiatives at first-generation students?

Adapted from First-Generation College Students: Understanding and Improving the Experience from Recruitment to Commencement, *by Lee Ward, Michael J. Siegel and Zebulun Davenport. For information about this and other Jossey-Bass publications, go to* www.wiley.com. ■

Encourage professional development through self-coaching

By Howard M. Guttman

To groom the next generation of enrollment managers in lean times, consider the cost-effective, self-coaching approach.

When individuals coach themselves, they take responsibility for their own personal growth.

To launch a self-coaching program:

❏ Ensure campus leaders and HR professionals understand the process so they can guide interested staffers.

❏ Identify likely candidates among high-potential staffers.

❏ Work with individuals or hold workshops for your entire team or with other units.

❏ Schedule follow-up meetings to share lessons learned and support.

❏ To identify candidates for self-coaching, look for willingness to drop defenses and become vulnerable in an effort to improve. Remember that those not willing to make profound changes aren't candidates for self-coaching.

Self-coaching programs have mentors and candidates work through these seven steps, with candidates responding to key questions:

1. Determine your self-coachability. Am I able, ready and willing to change my behavior permanently?

Tell candidates they have been invited to participate because of their potential as future leaders.

Then help them determine if they're able to self-coach by having them answer a series of questions you can find on *www.coachyourselftowin.com.* (You must register to access the free materials.)

2. Select intention. What is my ultimate goal or intention? It's a deliberate choice. Mentors serve as a sounding board during this step.

3. Identify supporters. Who can provide support and insight about my behavior? Who will be honest?

Those coaching themselves often need help selecting mentors and co-workers on campus for this. You could be the perfect guide or support circle member.

4. Solicit feedback. What can these people tell me about my behavior and how to change or what I have to do to move to the next level?

> **MANAGING YOUR OFFICE**
> This regular feature provides you with guidance to help you sharpen your management skills.

They must assure co-workers that candid feedback will be valued and acted on. Help them understand how to gather feedback by checking out our website.

5. Analyze, respond to feedback. What's the message these people are giving me and how will I respond? Help those coaching themselves view feedback as a gift, not a threat.

6. Develop a game plan. What actions will I take and when? Support staffers in crafting a realistic personal development plan in writing with time lines.

7. Track success. Am I accomplishing my goals? If not, how can I get back on track? How will I know when I've reached my goals? Encourage those coaching themselves to stay on track.

Howard M. Guttman is principal of Guttman Development Strategies, Inc. This article was adapted from one published in Leader to Leader, *Vol. 2012, Issue 63.*

For more, see www.wiley.com *and input the journal name in the search engine.* ■

DISCRIMINATION

OCR faults readmission treatment of student with mental illness

Case name: *Letter to: Case Western Reserve University*, No. 15-11-2024 (09/30/11).

Ruling: OCR entered into a resolution agreement with Case Western Reserve University to resolve a student's allegation that he was involuntarily withdrawn and denied readmission because of his disability.

What it means: Under Section 504, the "direct threat" standard applies to situations where a university proposes to take adverse action against a student whose disability poses a significant risk to the health or safety of others.

Summary: OCR investigated a student's allegation that Case Western Reserve University discriminated against him on the basis of disability when it withdrew him from his program and later denied him readmission unless he agreed to certain conditions.

University officials explained that the student was involuntarily withdrawn because, based on his conduct and statements he made, they were concerned that he posed a risk of harm to himself or others. The documentation provided to OCR officials indicated that university administrators believed the student suffered from a mental illness. As a result, he was withdrawn and provided assistance to return to his home in India.

He was denied readmission because his treating physician failed to note in the readmission documentation that the student had been symptom-free for six months before applying.

OCR concluded that the university's "Emergency Medical or Behavioral Withdrawal and Readmission

Policy and Procedures" were not in compliance with federal disability laws and regulations. The agency noted that only students with mental illness were required to complete a "Return to Campus Life" form — which included inquiries about the diagnosis, treatment, medications and the likelihood that the student posed a "substantial danger or risk to his or her own health … [or] the health or well-being or another person."

The university agreed to enter into a resolution agreement with OCR. The agreement required that the university: (1) notify the student that he was permitted to re-enroll in the undergraduate program with no restrictions or requirements other than those that applied equally to all students who attended the university; (2) revise the "Emergency Medical or Behavioral Withdrawal and Readmission Policy and Procedures" to ensure full compliance with Section 504; (3) report to OCR on the implementation of the revised policies and procedures; (4) publish the revised policies and procedures; and (5) train university officials and staff on the revised policies and procedures related to the admission and readmission of students. ■

FERPA

FERPA right to amend does not apply to accurate records

Case name: *Letter to: Anonymous parent* (FPCO 12/15/09).

Ruling: The Family Policy Compliance Office determined that a school district did not violate the complainant's rights under the Family Educational Rights and Privacy Act when it refused to expunge certain records.

What it means: FERPA's amendment provision does not apply to substantive decisions made by school or higher education officials, such as grades or other student evaluations. It is intended to require only that educational institutions conform to fair recordkeeping practices.

Summary: The FPCO responded to an attorney's complaint letter on behalf of a client who claimed that her rights under FERPA were violated when her son's school district refused to amend his education records.

The agency explained that FERPA affords parents and eligible students the opportunity to seek amendment of education records when the information is inaccurate or misleading. A school must consider the request for amendment, inform the parent or eligible student of its decision, and, if the request is denied, advise the requester that she has the right to a hearing.

If, as a result of a hearing, the institution decides not to amend the record, then the parent or eligible

student has the right to insert a statement in the record setting forth his views.

After an investigation, the agency found that the records the parent wished to expunge were accurately recorded by the school district. Therefore, FERPA's amendment provision did not apply to this request. ∎

DUE PROCESS

Court upholds student's suspension without prior hearing

Case name: *Wells v. Columbus Technical College, at al.*, No. 4:11-CV-80 (M.D. Ga. 04/16/12).

Ruling: The U.S. District Court, Middle District of Georgia dismissed the plaintiff's due process claim against Columbus Technical College.

What it means: Generally, educational institutions must provide due process before suspending a student. However, there may be situations where a student's presence poses such a danger to persons or property that suspension without a hearing may be justified.

Summary: Mosi Wells was a student at Columbus Technical College.

In April 2011, he had a physical altercation with another student in the college library. In May, there was an altercation between Wells and two other students in a welding classroom and lab area.

On June 1, Wells met with the vice president of academic affairs about the May incident. At that time, he was told that there would be an investigation and that he would be suspended if another incident occurred.

Wells then returned to the welding shop and accused two instructors of lying about him. Because he was visibly upset, security escorted him off the campus. Wells was told that he had to leave campus for the day but that he could return the next day.

However, the vice president sent an email that afternoon to instructors and campus security stating that Wells was suspended and banned from campus.

Unaware of that email, Wells returned to campus the next day. Security guards again escorted him from the campus.

A week later, Wells was suspended for a period of 12 months. When his administrative appeal was denied, Wells sued the college and others.

One of his claims was that the defendants failed to provide him with a hearing before he was suspended.

The judge noted that the law generally requires that a hearing be conducted before a student is suspended for even a short time. However, he said that an exception existed when a student's presence posed a continuing danger to persons or property or an ongoing threat of disrupting the academic process.

Ultimately, the judge decided that Wells' conduct was sufficiently threatening and disruptive to justify his suspension without a prior hearing.

He dismissed the case. ∎

LAWSUITS & RULINGS
This regular feature summarizes recent court or agency records of interest to enrollment managers.

CHARLENE A. STINARD, DIRECTOR OF TRANSFER AND TRANSITION SERVICES, UNIVERSITY OF CENTRAL FLORIDA

Support transfer students before and after they enroll

More than 11,000 transfer students enroll at the University of Central Florida each year, so Charlene A. Stinard and her staff have a big job ensuring that they make the transition smoothly. She's director of transfer and transition services.

With a small staff, Stinard's office has met the needs of UCF's rapidly growing transfer-student population with an innovative peer mentor program.

Rather than merely being campus ambassadors, the peers are trained advisors who are able to discuss prerequisites and major requirements with prospective and incoming transfer students. They also lead orientation.

CHARLENE A. STINARD

"The model is really powerful," Stinard said. For institutions facing budget cuts that prevent staffing from keeping up with growth, peer mentoring can fill the gap, she added. And peer mentors gain many transferable professional skills, Stinard said.

Overall, the office engages in about 70,000 contacts a year. Many of them are with potential transfer students, and staff members and peer mentors work with them to make sure they are academically ready when they transfer. Most of the students transfer with associate degrees from four partner institutions. They are guaranteed admission to UCF with those degrees.

TTS officials advise them to choose a major and take the prerequisites for it while they are earning their AAs.

When students transfer, they attend a mandatory day-long orientation. The sessions typically include about 550 students and 175 parents, Stinard said. The students meet with academic advisors and register during the orientation, she said.

Stinard has changed the orientation program in the past few years because of feedback peer mentors have given. For example, officials now spend less time on policies and procedures. "Everyone is on information overload," Stinard said.

Instead, staff and mentors spend more time helping incoming students make personal connections so that they will feel comfortable asking for help later. The incoming students leave orientation with a business card for the office and instructions to call for any type of help they need.

The peer mentors also present a session on transfer shock. Coming from a smaller campus to UCF, which has about 54,000 students, can be a challenge.

The peers also created the Transfer Knights Club, which offers a series of workshops each semester to engage transfer students in the campus community. Transfer students often get stuck in the "iron triangle" of classroom, apartment and work, Stinard said. They have the idea that if they come to campus for events, they won't know anyone. But everyone else there will have been at the institution since their freshman year and will be friends.

The peer mentors are all transfer students, and Stinard starts recruiting for the next group at orientation. She tries to hire seven or eight, and by the end of the first month of classes, the group is often down to five. The hardest part of managing the program is recruiting male students, she said.

They work 10 hours a week at the federal minimum wage, she said.

The peers receive extensive training and are tested on their knowledge. Stinard developed a rubric to assess their advising skills with the help of professionals in the assessment office and the Center for Teaching and Learning. Each stage of training has very specific learning outcomes, she said. For example, mentors need to be able to explain the five areas of general education and be able to conduct a degree audit.

Email Charlene A. Stinard at Charlene.Stinard@ucf.edu. ∎

Create a peer mentor program with these tips

Peer mentors for the University of Central Florida's Transfer and Transition Services advise prospective and incoming students. If student-workers could help your unit meet demands, consider these strategies:

✓ **Be selective about hiring.** UCF's peer mentors must maintain at least a 3.0 GPA. And they must be transfer students so that they understand the issues they are helping students address.

✓ **Provide effective training.** TTS offers training modules and tests the mentors. Officials also use a rubric to assess peers' effectiveness as advisors.

✓ **Enable peers to develop a range of skills.** TTS mentors' work includes counseling, event planning and public speaking.

✓ **Assess the effectiveness of efforts.** TTS assesses its programs annually and values input from peers for improving services. ∎