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Gainful Employment Disclosures: Methodology and Summary of Results for Foothill College

Introduction

Gainful Employment regulations require institutions to disclose information on student outcomes for educational programs that receive funds from federal student aid programs authorized under Title IV and the HEA (Higher Education Act of 1965, as amended). Specific to this work, institutions must provide the following data for each GE (gainful employment) educational program:

- Cost: including tuition, required fees, books and supplies
- Length of program, based on normal time of completion
- On-time completion-rate
- Median student loan debt: Title IV, private, and institutional debt
- Placement rate(s), when required by state or federal accreditation agencies
- Occupations for which the program purports to provide training

Private non-profit and public institutions of higher education, such as community colleges, are required to disclose this information for all non-degree educational GE programs (i.e., certificates) using a web-based application or template. The template, or web page, will display all the required information and must be posted on the home page of the program or made easily accessible through a hyperlink. (See Figure 1 for details.) Promotional materials for the program must also include how to access the information, or make it easily accessible. By displaying the information through a template or standard format, the GE disclosures are meant to “improve market information that will assist students, prospective students, and their families in making critical decisions about their educational investments and in understanding potential outcomes of their investments.”¹

This report describes the methodology used to calculate the figures included in the disclosures for De Anza College and summarizes findings for all GE programs at the College for the academic year of 2014-2015.

Methodology

Program figures (i.e., cost and length) were based on information published on the college catalog (web page for degrees and certificates offered at Foothill College, 2015-16²) and the Office of Admissions & Records at the College.³ The ECAR⁴ provided data on program length, weeks. When not available,

¹ Gainful Employment; Final Rule, 79 Fed. Reg. 79, 211 (October 31, 2014) (to be codified at 34 C.F.R. pt. 600, 668).

² <http://www.foothill.edu/programs/programs.php>

³ <http://www.foothill.edu/reg/fees.php>

program length was calculated by dividing the number of units by 12,⁵ with the remainder treated as an additional 12 weeks or 1 quarter. For on-time completion calculations, a time period of 36 weeks was treated as a year (3 primary quarters of 12 weeks during the academic year). Tuition cost was the result of the number of units times \$31 (state-mandated per-unit fee); fees, \$49 times the number of quarters (assuming a maximum of 12 units per quarter); books and supplies, \$588 (\$1,764⁶, books and supplies for an academic year, divided by 3 primary quarters) times the number of quarters to complete the program. Time to completion was calculated from the first date of enrollment since the last degree or certificate was awarded to the student at the College, if applicable, to the last date for the term when the certificate was awarded. Students were excluded from the analysis if they earned a degree on a prior or the same the term of the academic year when they earned the certificate. MIS Financial Aid⁷ data files were used to calculate figures for student loan debt (Title IV, institutional or private loans) during the academic years the student was enrolled in the program. SOC (standard occupational codes) were initially identified based on program CIP (Classification of Instructional Programs) codes,⁸ and then reviewed for consistency. The California Community College Chancellor's Office (CCCCO) Curriculum Inventory⁹ was used to identify programs approved by the CCCCCO.¹⁰ Including only certificates approved by the CCCCCO inventory was meant to address minimum requirements for financial aid; in specific, that the instructional programs satisfied applicable minimum federal or state certification requirements. Information included in the ECAR¹¹ was compared to that in the College catalog and the CCCCCO program inventory to identify and resolve any discrepancies across data sources for GE programs currently offered at the College.

Results

For the 2014-15 academic year, a total of 534 students were awarded at least one certificate at Foothill College. Data in Table 1 show that certificates for 34 programs were awarded, including 5 programs no longer offered in the 2015-16 academic year. Of these 34 programs or certificates, 27 (79%) met minimum requirements for Title IV financial aid and Gainful Employment (GE) reporting for the current 2015-16 academic year based on number of units, at least 27 quarter units,¹² and approval by the CCCCCO Curriculum Inventory.¹³ Data in this table also show that the Transfer Studies certificates accounted for 77% (414 of 534) of the total student headcount. Transfer Studies certificates are not considered Gainful Employment (GE) programs because their main objective is not to prepare students

⁴ Eligibility and Certification Approval Report: Identifies programs that are Title IV eligible.

⁵ 12 quarter units is the minimum unit requirement for students to be eligible for financial aid.

⁶ http://www.foothill.edu/aid/fa_cost.php

⁷ Student Financial Aid data submitted by the District to the CCCCCO, more information at <http://extranet.cccco.edu/Divisions/TechResearchInfoSys/MIS/DED/StudentFinancialAid.aspx>

⁸ The crosswalk of SOC and CIP codes is available at <https://www.onetcenter.org/supplemental.html>.

⁹ The unique code assigned to the program is used as evidence of the certificate having been approved by the CCCCCO Curriculum Inventory. <http://curriculum.cccco.edu/ReportsPublic/InventoryReport/Report>

¹⁰ According the GE regulations, a basic requirement for eligibility of financial aid is that the program "...satisfies any applicable State or Federal program-level accrediting requirements and State licensing and certification requirements for which the program purports to prepare the student to enter." (Gainful Employment; Final Rule, 79 Fed. Reg. 79, 211 (October 31, 2014) (to be codified at 34 C.F.R. pt. 600, 668).

¹¹ The Eligibility and Certification Approval Report (ECAR) identifies programs that are Title IV eligible.

¹² At Foothill College, only certificates of at least 27 units are certified for financial aid.

¹³ All programs or certificates of more than 27 units need to be approved by the CCCCCO. After approval, all they are assigned a control or unique number used for reporting/tracking. Website for the CCCCCO Program Inventory: <http://curriculum.cccco.edu/ReportsPublic/InventoryReport/Report>. As part of eligibility for Title IV funds, certificates must satisfy applicable program-level state or federal licensing or certification requirements.

for employment in a recognized occupation,¹⁴ but to facilitate transfer to a bachelor's degree program at a four-year institution.

Prior to analyzing data for GE disclosures, information for certificates in the Foothill College catalog¹⁵ for 2015-16 was compared to that in the ECAR¹⁶ and the CCCCOCurriculum Inventory to assess any data discrepancies across related reporting systems. The online college catalog showed 32 certificates with at least 27 credit units; of these, 29 certificates have been approved by the CCCCOCurriculum Inventory,¹⁷ including the 2 Transfer Studies programs. The three titles missing from the inventory were *Child Development Teacher*, *Photography*, and *Traditional Photography*.¹⁸ Regarding the number of units, 3 certificates showed a difference of at least 15 quarter units between the catalog and the inventory (certificates for *Accounting*, *Diagnostic Medical Sonography*, and *Paramedic*). When comparing data in the college catalog to that in the ECAR, figures showed significant discrepancies regarding the number of units (at least 15 quarter units) for 4 programs: *Accounting*, *Diagnostic Medical Sonography*, *Music Technology*, and *Primary Care Associate*.¹⁹ The following nine titles were not found in the ECAR: *Traditional Photography*, *Field Ironworking*, *GIS Technology I*, *GIS Technology III*, *CPA Examination Preparation*, *Steamfitting & Pipefitting Technology*, *Art*, *Air Conditioning & Refrigeration Technology*, and *Plumbing Technology*.

Data in Table 2 show student headcount by area, certificate title, and GE category, including the following:

- a. 13 (48%) of the 27 certificates in the college catalog had a student headcount of at least 1; the median student headcount was 5. The student headcount for all certificates was 116.
- b. Of the 116²⁰ students who were awarded a least one GE certificate,
 - i. 72 (62%) students were awarded a degree during the same or later academic period of the academic year. These students were identified as 'Not GE' (not Gainful Employment) students.
 - ii. 1 (<1%) student was awarded a degree prior to the certificate, during the same academic year. This student was identified as 'GE with Degree' (Gainful Employment student who earned certificate after a degree).
 - iii. 43 (37%) students were awarded at least one certificate, but not a degree; these were identified as 'GE without Degree.'
 - iv. Final headcount for GE students in 2014-15 to be included in statistics for disclosures, 44.

¹⁴ Gainful Employment; Final Rule, 79 Fed. Reg. 79, 211 (October 31, 2014) (to be codified at 34 C.F.R. pt. 600, 668).

¹⁵ Degrees and certificates offered at Foothill College in 2015-16 are available at: <http://www.foothill.edu/programs/programs.php>

¹⁶ Eligibility and Certification Approval Report—Identified certificates that are eligible for Title IV financial aid

¹⁷ The following program do not show in the CCCCOCurriculum Inventory or show discrepancies as it relates to the title and number of units: *Child Development Teacher*, *Photography*, and *Traditional Photography*.

¹⁸ For the area of photography, title and number of units in the inventory were inconsistent with those in the catalog. The *Child Development Teacher* certificate did not show in the inventory.

¹⁹ Del Río-Parent, L. (2015). Data discrepancies among catalog, CCCCOCurriculum Inventory, and the ECAR for De Anza College certificates. Los Altos Hill, CA: Foothill-De Anza CCD, Office of Institutional Research & Planning.

²⁰ Categories are not mutually exclusive; students may have earned multiple certificates at different times; GE student status may change depending on when the degree and certificate were awarded.

- c. 5 of the 27 certificates (19%) had a total student headcount of at least 10, but only the Geographic Information System Analyst certificate had a total GE student headcount of at least 10.

Estimated Costs

The cost for each program or certificate was based on the number of units published in the college catalog for 2015-16 academic year (\$31 per unit), basic fees (\$52 per quarter) shown on the Admissions and Registration webpage,²¹ and allowance for books or equipment (\$588 per quarter, plus any other required additional costs if applicable) published by the financial aid office²² or program webpage.

Data in Table 3 show estimated costs and related figures by certificate, which can be summarized as follows:

- There is significant variance in terms of total estimated costs for the certificates. Total costs can range from about \$60,000 (*Primary Care Associate*, 117 units; \$60,201) to little above \$2,000 (*Digital Photography*, 24 units, \$2,210). For the *Primary Care Associate*, Stanford University School of Medicine certification fees account for 87% (\$52,094 out of \$60,201) of the program costs. Other programs with significant additional costs (i.e., cost for books, supplies, and other fees) are the *Diagnostic Medical Sonography* (\$6,528, total \$10,452) and *Paramedic* (\$5,440, total \$7,886); an estimated additional \$500 per academic period (total \$1,088 per quarter).
- After excluding the *Primary Care Associate program*, data for the remaining 26 certificates show:
 - The average total cost, \$2,370; the median, \$2,352.
 - The average for the total number of credit units, 47 units; the median, 46 units.
 - The average and median for the number of quarters, 4.
 - On average, costs for books, supplies, and other fees accounted for 57% of total costs.

Time to Completion

To determine how long a student took to complete the program (i.e., earn a certificate), the time between the start date for first term the student enrolled at the college to the end date for the term when the certificate was awarded was calculated. For students with an earlier award at the College (degree or certificate), the first date for the term in which the student enrolled after the previous award was set as the new start date.²³ To account for only primary terms (exclude summer intersessions), one year of enrollment was set to 36 weeks²⁴. The calculated 'time to completion' for every student was compared to the number of weeks required to complete the certificate, normal time to completion, as shown in the ECAR. For new certificates (not yet in the ECAR), the number of weeks was based on the number of units published in the College Catalog (12 units per quarter, 12 weeks for every quarter).²⁵ The number

²¹ Admissions & Registration, <http://www.foothill.edu/reg/fees.php>

²² Cost of attendance for Foothill College available at: http://www.foothill.edu/aid/fa_cost.php

²³ "When determining whether a student completed the GE Program in normal time, the institution must use the date of the student's first enrollment in any program at the institution (even if the prior program was not a GE Program), unless the student had completed the earlier program."
(<http://ifap.ed.gov/GainfulEmploymentInfo/GEFAQV2.html#D-Q9>)

²⁴ Unless otherwise Multiply number of years, rounded to two decimal points, by 36 to get number of weeks; for example, 1.33 * 36, about 48 weeks or 4 primary quarters.

²⁵ Number of units in the catalog was found to be a more accurate figure.

of all students who completed the program was divided by the number of students who completed the program within normal time and the result was multiplied by 100 to get the on-time completion rate for the program or certificate.

Of the 27 certificates included in the analysis, only the Geographic Information System Analyst certificates had GE student headcount of at least 10 students, and none of these students completed the certificate in within normal time, 2 quarters. On-time completion rates and related figures for this certificate are shown in Table 4.

Median Loan Debt

MIS²⁶ data files were used to calculate the amount of debt for every student during the academic years of enrollment applicable to the certificate. The data element SF21-Award-Type was used to identify private loan (LN), Title IV loans (LD, LG, LH, LP, LS, LL), or institutional loans (LI). SF22-Award-Amount was used to identify incurred debt. The median debt amount (mid-point score for total amount of debt for all students in the program, including those with zero or no debt) was identified for each type of loan debt. Data in Table 5 show median loan debt for the only program with at least 10 completers, Geographic Information Systems Analyst. None of the students in this program showed student loan debt.

Disclosures

Disclosures for GE programs at Foothill College are available at:
http://www.foothill.edu/workforce/Gainful_Employment/

Conclusions

Data suggest that there is little demand for GE certificates currently offered at Foothill College. With only one program showing a completers count equal or greater than 10, the main questions to address is not about student loan debt or on-time completion rates for GE programs. The questions are:

- (1) Is there is a need or demand for certificates within the Foothill College community or service area?
- (2) If such a need or diamond exists, what are the certificates or programs Foothill College should offer?

²⁶ <http://extranet.cccco.edu/Divisions/TechResearchInfoSys/MIS/DED/StudentFinancialAid.aspx>

Figure 1

Information Included in Disclosure Template

The screenshot displays a web page for Foothill College's "Certificate of Achievement: Primary Care Associate" program. The page is annotated with several callouts in red speech bubbles:

- Program length information:** Points to the header area stating "Program Level - Undergraduate certificate" and "Program Length - 84 weeks".
- Program cost:** Points to the "COST" section, which lists "Tuition and fees: \$56,085", "Books and supplies: \$4,116", and "On-campus room & board: \$0".
- On-time completion rate:** Points to the "SU Courses" section, which states "The program is designed to take 84 weeks to complete. Of those that completed the program in 2014-2015, % finished in 84 weeks".
- Additional costs:** Points to a link that says "What other costs are there for this program?".
- Student loan debt:** Points to the "FINANCING" section, which lists "Federal loans: *", "Private education loans: *", and "Institutional financing plan: *".
- Information on occupations related to the program:** Points to a link that says "Click here for more information on occupations related to this program".

On the left side of the page, there is a sidebar menu for the "PRIMARY CARE ASSOCIATE PROGRAM" with a table titled "Costs and Financial Aid".

California (CA) Resident	
Enrollment fees:	\$ 3,627.00
Foothill Student Fees (347 x 8):	\$ 3,760.00
Stanford University School of Medicine * Certification Fees:	\$ 7,442 / quarter
Total CA Resident Cost:	\$ 56,097.00

At the bottom right, there is an O*NET OnLine "Summary Report for: 29-1071.00 - Physician Assistants".

Notes

GE Disclosures for Foothill College available at: http://www.foothill.edu/workforce/Gainful_Employment/

Table 1
Student Headcount by Certificate, Foothill College 2014-15

Area	Certificate Title	Student Headcount	Headcount Percent
Accounting	Accounting	9	2%
Accounting	CPA Examination Preparation	0	0%
Apprenticeship	Field Ironworking	0	0%
Apprenticeship	Plumbing/Pipefitting/Pipe Trades Apprenticeship	0	0%
Apprenticeship	Sheet Metal Building Trades	0	0%
Apprenticeship	Air Conditioning & Refrigeration Technology	0	0%
Apprenticeship	Plumbing Technology	0	0%
Apprenticeship	Steamfitting & Pipefitting Technology	0	0%
Art	Art	1	0%
Art	Art History	0	0%
Child Development	Program Supervision & Mentoring	1	0%
Dental Assisting	Dental Assisting	10	2%
Diagnostic Medical Sonography	Diagnostic Medical Sonography	17	3%
Environmental Horticulture and Design	Environmental Horticulture & Design	5	1%
General Electrician	Inside Wireman	0	0%
Geographic Information Systems Technology	Geographic Information Systems Technology I	0	0%
Geographic Information Systems Technology	Geographic Information Systems Technology III	0	0%
Geography	Geographic Information Systems Analyst	12	2%
Graphic and Interactive Design	Graphic and Interactive Design	0	0%
Music Technology	Music Technology	2	0%
Music Technology	Pro Tools	3	1%
Nanoscience	Nanoscience	0	0%
Paramedic	Paramedic CEA	0	0%
Pharmacy Technician	Pharmacy Technician	17	3%
Photography	Digital Photography	1	0%
Primary Care Associate Program	Primary Care Associate	37	7%
Theatre Technology	Theatre Technology	1	0%
Transfer Studies	Transfer Studies-CSU GE	57	11%
Transfer Studies	Transfer Studies--IGETC	357	67%
<i>Sub-total Headcount</i>		528	99%

Student Headcount by Certificate, Foothill College 2014-15

Area	Certificate Title	Student Headcount	Headcount Percent
Certificates not longer in Current Catalog or not Approved by CCCCO Curriculum Inventory			
Old Catalog	Adaptive Fitness Therapy	3	1%
Old Catalog	CHDV Teacher	2	0%
Old Catalog	Photography	2	0%
Old Catalog	Accounting	1	0%
Old Catalog	Traditional Photography II	1	0%
Total Student Headcount		534	100%

Table 2**Student Headcount by Certificate and Gainful Employment Category, Foothill College, 2014-15**

Certificate Title	Total Student Headcount	Not GE Headcount	GE without Degree Headcount	GE with Degree Headcount	Total GE Student Count
Primary Care Associate	37	36	1	0	1
Pharmacy Technician	17	14	3	0	3
Diagnostic Medical Sonography	17	15	2	0	2
Geographic Information Systems Analyst	12	0	12	0	12
Dental Assisting	10	2	8	0	8
Accounting	9	3	6	0	6
Environmental Horticulture & Design	5	0	5	0	5
Pro Tools	3	0	2	1	3
Music Technology	2	1	1	0	1
Art	1	0	1	0	1
Digital Photography	1	0	1	0	1
Theatre Technology	1	0	1	0	1
Program Supervision & Mentoring	1	1	0	0	0
Air Conditioning & Refrigeration Technology	0	0	0	0	0
Art History	0	0	0	0	0
Examination Preparation CEA	0	0	0	0	0
Field Ironworking	0	0	0	0	0
Geographic Information Systems Technology I	0	0	0	0	0
Geographic Information Systems Technology III	0	0	0	0	0
Graphic and Interactive Design	0	0	0	0	0
Inside Wireman	0	0	0	0	0
Nanoscience	0	0	0	0	0
Paramedic	0	0	0	0	0
Plumbing Technology	0	0	0	0	0
Plumbing/Pipefitting/Pipe Trades Apprenticeship	0	0	0	0	0
Sheet Metal Building Trades	0	0	0	0	0
Steamfitting & Pipefitting Technology	0	0	0	0	0
Total Student Headcount	116	72	43	1	44

Notes

Includes certificates applicable to GE reporting, with at least 27 units and approved by the CCCC Curriculum Inventory.
Transfer studies certificates are not applicable to GE reporting.

Table 3**Estimated Costs by Certificate, Foothill College, 2015-16**

Area	Certificate Title	Credit Units	ECAR Weeks	Number of Quarters	Total Tuition Cost	Total Basic Fees	Total Books, Supplies & Other fees	Total Cost
Accounting	Accounting CEA	53	36	3	\$ 1,643	\$ 156	\$ 1,764	\$ 3,563
Accounting	CPA Examination Preparation CEA	37	N/A	4	\$ 1,147	\$ 208	\$ 2,352	\$ 3,707
Apprenticeship	Air Conditioning & Refrigeration Technology	45.5	N/A	4	\$ 1,411	\$ 208	\$ 2,352	\$ 3,971
Apprenticeship	Field Ironworking	37	N/A	4	\$ 1,147	\$ 208	\$ 2,352	\$ 3,707
Apprenticeship	Plumbing Technology	47.5	N/A	4	\$ 1,473	\$ 208	\$ 2,352	\$ 4,033
Apprenticeship	Plumbing/Pipefitting/Pipe Trades Apprenticeship	42.5	36	3	\$ 1,318	\$ 156	\$ 1,764	\$ 3,238
Apprenticeship	Sheet Metal Building Trades	40.5	36	3	\$ 1,256	\$ 156	\$ 1,764	\$ 3,176
Apprenticeship	Steamfitting & Pipefitting Technology	47	N/A	4	\$ 1,457	\$ 208	\$ 2,352	\$ 4,017
Art	Art	35	N/A	3	\$ 1,085	\$ 156	\$ 1,764	\$ 3,005
Art	Art History	48	48	4	\$ 1,488	\$ 208	\$ 2,352	\$ 4,048
Child Development	Child Development Teacher	73	60	5	\$ 2,263	\$ 260	\$ 2,940	\$ 5,463
Child Development	Program Supervision & Mentoring	85	72	6	\$ 2,635	\$ 312	\$ 3,528	\$ 6,475
Dental Assisting	Dental Assisting	55	36	3	\$ 1,705	\$ 156	\$ 3,264	\$ 5,125
Diagnostic Medical Sonography	Diagnostic Medical Sonography	116.5	72	6	\$ 3,612	\$ 312	\$ 6,528	\$ 10,452
Environmental Horticulture and Design	Environmental Horticulture & Design	64	60	5	\$ 1,984	\$ 260	\$ 2,940	\$ 5,184
General Electrician	Inside Wireman	40	24	2	\$ 1,240	\$ 104	\$ 1,176	\$ 2,520
Geographic Information Systems Technology	Geographic Information Systems Technology I	43	N/A	4	\$ 1,333	\$ 208	\$ 2,352	\$ 3,893

Estimated Costs by Certificate, Foothill College, 2015-16

Area	Certificate Title	Credit Units	ECAR Weeks	Number of Quarters	Total Tuition Cost	Total Basic Fees	Total Books, Supplies & Other fees	Total Cost
Geographic Information Systems Technology	Geographic Information Systems Technology III	31	N/A	3	\$ 961	\$ 156	\$ 1,764	\$ 2,881
Geography	Geographic Information Systems Analyst	34	24	2	\$ 1,054	\$ 104	\$ 1,176	\$ 2,334
Graphic and Interactive Design	Graphic and Interactive Design	58	60	5	\$ 1,798	\$ 260	\$ 2,940	\$ 4,998
Music Technology	Music Technology	47.5	36	3	\$ 1,473	\$ 156	\$ 1,764	\$ 3,393
Music Technology	Pro Tools	36	36	3	\$ 1,116	\$ 156	\$ 1,764	\$ 3,036
Nanoscience	CEA in Nanoscience	30	36	3	\$ 930	\$ 156	\$ 1,764	\$ 2,850
Paramedic	Paramedic	70.5	56	5	\$ 2,186	\$ 260	\$ 5,440	\$ 7,886
Pharmacy Technician	Pharmacy Technician	54	48	4	\$ 1,674	\$ 208	\$ 2,352	\$ 4,234
Photography	Digital Photography	30	24	2	\$ 930	\$ 104	\$ 1,176	\$ 2,210
Photography	Photography	40	24	2	\$ 1,240	\$ 104	\$ 1,176	\$ 2,520
Photography	Traditional Photography	30	N/A	3	\$ 930	\$ 156	\$ 1,764	\$ 2,850
Primary Care Associate Program	Primary Care Associate	117	84	7	\$ 3,627	\$ 364	\$ 56,210	\$ 60,201
Theatre Technology	Theatre Technology	48	36	3	\$ 1,488	\$ 156	\$ 1,764	\$ 3,408

Notes

All certificates in the online college catalog of at least 27 units are listed, excluding Transfer Studies certificates.

N/A: Not in ECAR

Table 4**On-Time Completion Rate by Certificate, Foothill College, 2014-15**

Certificate Title	Number of Quarters	Number of Completers	Number of On-Time Completers	On-Time Completion Rate
Certificate of Achievement, Geographic Information Systems Analyst	2	12	0	0%

Table 5**Student Median Loan Debt by Certificate, Foothill College, 2014-15**

Certificate Title	Complete rs	Completers with Debt Headcount	Median Title IV Debt	Median Private Debt	Median Institutional Debt
Certificate of Achievement, Geographic Information Systems Analyst	12	0	0	0	0

Notes

On-time completion and loan debt figures are only calculated for programs with at least 10 completers.