

**Beyond the
CRUMs
Common, Routine, Usual,
Mundane**

**BITES
Better Initiatives to
Extraordinary Services**

CONSUMER PROTECTION:

What states are doing to protect consumers

Presenters:

Renea H. Eshleman, Coordinator, Nonpublic Postsecondary Institution Licensing, SC Commission on Higher Education

Marla Winegar, Investigator for the Utah Division of Consumer Protection

Mary Jayne Fay, Coordinator, Office of Proprietary Schools, Massachusetts Department of Elementary and Secondary Education

The common, routine, usual, mundane (CRUMs)

- Advertising Guidelines
- Disclosures
- Refund Policies
- Complaint Procedures
- Financial Stability
- Bonding/Recovery Funds

Beyond CRUMs

- Publishing (consumer information)
- Providing public access to databases
- Using outcomes assessments for improvement (WI)
- Expanding complaint/appeals (GA)
- Arbitrating
- Mandating tuition collection policies
- Acting on non-compliance
- Developing inter-agency partnerships

Publishing – “Is This A Good School,” Employer Guide

- Information that is easy to find, navigate, and understand: links
 - Student assistance information
 - Outcomes, satisfaction surveys
- Where: web sites, mail, placement in public areas (libraries)

Providing public access to databases

- CRUM: directories
- BITES: Statistics - enrollments, completions, placements (most meaningful by program) (WI, TX)

Expanding complaint/appeals

- CRUM: Structure to process at the institutions, then references to authorizing and accrediting agencies
- BITE:
 - Authority to investigate at exempt institutions
 - Intra-agency appeals (staff, executive, board)

Arbitrating – affect a student's ability to file a lawsuit

- Require complaint process to include option of complaining to authorizing agency before entering arbitration
- Authorizing agency is not a party to arbitration and can take appropriate action against a school regardless of arbitration clauses
- Disallow language that suggests the students waive their ability to file a complaint with authorizing agency

Mandating tuition collection policies

- Limiting obligation of students to term (quarter, semester) or specific number of clock hours
- Limiting private loan disbursements based on amount and/or length (in time) of program (OH, GA, MA, UT)

Acting on non-compliance

- “Buyer Beware” lists – schools illegally operating
- Publishing information on school officials from schools that closed owing refunds
- Publishing information on unresolved complaints or “trends”
- Statuses of schools’ licenses, actions against schools

Developing inter-agency partnerships

- Informing: who we are, what we do, where they can find us
- State level: attorney general, consumer protection, practitioner licensing agencies, secretary of state, HR
- Non-governmental: accrediting agencies, U.S.D.O.E., Better Business Bureau, chambers of commerce