



The Career College Information Source

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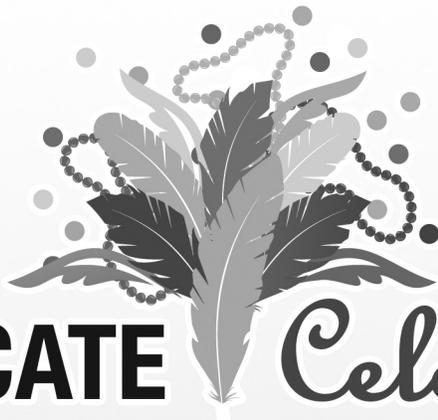
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EDUCATE Celebrate

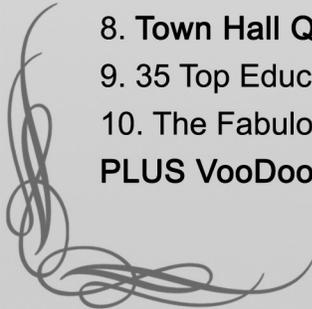
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The Career College Information Source



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Greendale

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DeFusco

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CAREER EDUCATION REVIEW'S
Career College Event Calendar

September 2014 – October 2014

Dates You Need to Know

September 2014

**Virginia Career Collage
Association (VCCA)**

37th Annual Fall Conference
Hilton Short Pump
Glen Allen, VA

September 26, 2014

www.va.cca.org

**National Accrediting Commission of
Career Arts & Sciences (NACCAS)**

Workshop
Hyatt Regency St. Louis
St. Louis, MO

September 27-30, 2014

<http://naccas.org/naccas>

October 2014

**Distance Education and Training
Council (DETC)**

Fall Workshop
The Driskill Hotel
Austin, TX

October 5-7, 2014

www.detc.org

**Accrediting Bureau of Health
Education Schools (ABHES)**

Programmatic Accreditation Workshop/
Institutional Accreditation Workshop
Hyatt Regency Monterey
Monterey, CA

October 13-14, 2014

www.abhes.org

**Career Colleges & Schools of Texas
(CCST)**

Annual Conference

La Cantera Hill Country Resort
San Antonio, TX

October 14-16, 2014

www.ccst.org

**The California Association of Private
Postsecondary Schools (CAPPS)**

30th Annual Conference
Hyatt Regency Monterey
Hotel & Spa
Monterey, CA

October 15-17, 2014

www.cappsonline.org

**Coalition of New York State
Career Schools**

New York State Career
School Convention
Villa Roma Resort &
Conference Center
Callicoon, NY

October 22-24, 2014

www.cnyscs.com

The APSCU Leadership Institute is Not Just Getting Older – it is Getting Better

By Dr. James (Jim) Hutton, Publisher, CER and Managing Direct, KUCCEL

CER visited the APSCU Leadership Institute July 14 and met the 2014 cohort of 20 current and future private sector career college leaders. The event was hosted by Keiser University and held at the KU campus in Tampa. Diane Miller, vice president of professional development at APSCU, facilitated the event and kept things moving in a very positive and upbeat manner. (The BBQ ribs were especially tasty Diane.) The list of teachers/presenters that Diane recruited was noteworthy and was yet another example of how private sector college and university leaders give back to career education.

This year, David Pauldine, retired president of DeVry University and Leadership Institute graduate, moderated the lectures and presented some great materials himself. Diane, Dave, and Dr. Art Keiser, Chancellor of Keiser University, welcomed the students Monday afternoon. KU Tampa President, Brandon Barnhill, was an accommodating and friendly host and opened his campus for the students and presenters.

The Leadership Institute (LI) emphasizes teamwork and

communication, plus a lifetime of networking. Each attendee became an active participant by virtue of break out groups, table discussions,

It is not a stretch to state that across the board each participant finished the week a far more educated and capable leader than when they arrived.

presentations students were asked to make on their biggest challenges, and individualized 'graduation speeches' on the last day. It is not a stretch to state that across the board each participant finished the week a far more educated and capable leader than when they arrived. CER was privy to the student evaluations and has honestly never seen higher marks for a professional development course. Students unanimously agreed the training exceeded expectations.

In addition to an interesting and informative session on leadership, Dave provided the following summary of what the students could expect from the week:

- Guiding Themes:
 - If we focus on the student, everything else takes care of itself.
 - Quality is the gateway to growth.
- Stress the critical importance of values, vision and mission in the role of leading an institution.
- Describe the differences between leadership and management and the place for each in the business cycle.
- Discuss the important role that leaders have in creating an effective work culture.
- End-to-end review of the business process of running an effective campus – marketing, admissions, student finance, academics, student services, career services, finance and budgeting.
- Presentations speaking to the importance of community and government relations as well as accreditation and compliance.
- Develop a lifelong network of colleagues and peers with common interests.

Each of the five days was organized around a “theme.” The welcomes and Dave’s opening remarks were just the beginning of Day One titled

Dr. Keiser challenged students to study and respect our past, stay ever attentive to the external environment, but maintain a clear focus on what is best for students through a “students first” culture.

“Setting the Stage.” Next, Dr. Arthur Keiser described our sector’s history, role and place in higher education. He reminded the class that proprietary education actually predated the founding of the United States of America, and the first “training and education” was on practical “how to” type knowledge through apprenticeships. The private sector’s involvement in higher education is

nothing new.

In the early years of the country, all colleges were nonprofit AND for-profit. For-profit, because having an excess of revenue over expenses is the only way for any organization to exist in the long run. Nonprofit, because there was no Federal income tax until the Civil War era, over two centuries after the first college was founded. Dr. Keiser challenged students to study and respect our past, stay ever attentive to the external environment, but maintain a clear focus on what is best for students through a “students first” culture.

Tuesday began with a brief discussion on participants’ biggest challenges and an overview and recap of the previous day. This was the structure of the first segment each day and the review/recap reinforced learning and emphasized practical application. LI participants face the same challenges as do all CER readers and Dave encouraged students to focus on strengths and opportunities and not dwell on threats or challenges. While an effective leader must be mindful of external risks, a good leader inspires his or her team to move forward through a crystal clear vision and purposeful mission.

Day Two’s theme was “Campus Operations.” The first speaker on Day Two was Jason Pistillo, President/CEO of University of Advancing Technology and another LI alumni. Jason’s topic was on “Effective Inquiry Generation.” His presentation touched on the many media options available today, with a strong suggestion for a multimedia channel approach. The key takeaway was on the effectiveness of an inquiry generation program through more creative and critical evaluation techniques and maximizing the return on the inquiry generation

investment. Readers will appreciate the analytical approach to marketing and admissions described in Jason's article on page 15.

Following Jason was Sherri Savasta, with Global Financial Aid Services. Sherri presented "Managing an Efficient and Compliant Financial Aid Office." Her presentation was an overview and introduction to the many facets of Federal Financial Aid. The presentation began with an overview of Federal Student Aid and the funding available to students. Next, Sherri discussed the processing of student files, and how to measure and improve performance in the financial aid area. Finally, she covered required reporting and audit requirements. Sherri's key message: College leaders MUST inspect what they expect from this highly technical and tightly regulated aspect of college administration.

Despite the 'just after lunch' time, students were wide-awake and intrigued by Vince Norton, Managing Partner, Norton Norris. In this session, participants learned about managing conversions through the classic admissions funnel. Vince included key metrics to measure basic admissions results. Management by exception concepts, inquiry tracking, and common definitions were discussed. Students examined actual "masked" reports and identified areas of improvement based on these reports. Students submitted their favorite admissions report prior to the event; examples were redacted and shared with the class.

After Vince, Dr. Jean Norris, Managing Partner, Norton Norris presented "Building and Managing an Effective Marketing and Recruitment Team." Jean presented exciting materials so that participants should

now be able to:

- Address key challenges in working with prospective students.
- Understand the history of collegiate enrollment and what has forced tremendous change.
- Define key competencies necessary for success in admissions.
- Articulate required disclosures.
- Evaluate current admission/recruitment methodologies to identify what may need to be modified/tweaked/thrown out/or developed.
- Best practices in training facilitation.
- Create a sustainable training plan to improve results.
- Articulate a proven method for managing change effectively.

Prior to the event, student completed the Advanced Admissions Professional Profile (AAP,) an online assessment designed to measure areas of strength and opportunity for those working in admissions. Jean and the students

reviewed the assessment and discussed other pre and post hiring assessment tools. Jean and Vince are frequent contributors to CER

In the late afternoon session, CER Publisher and KUCCEL Managing Director, Dr. Jim Hutton, presented "Strategic Planning and Financial Management." In this session, participants learned that the budget is the final step in the planning and goal setting cycle. Sound financial management and fiscal responsibility demand accurate and complete budgets compared against actual results. Jim suggested that effective budgets must be driven by the end-product of a sound, well-thought strategic plan.

Sound financial management and fiscal responsibility demand accurate and complete budgets compared against actual results.

A strategic plan examines the internal and external situation and positions an organization for optimal effectiveness and efficiency. The budget and operating reports compare institutions against their own plans, budgets, and prior years.

The heart of any school is the ability of the teachers to make it worthwhile for the student.

Benchmarking takes the operating reports to another level and compares results against peer norms and standard metrics. Participants examined and were given copies of mission statements, budgeting spreadsheet tools, dashboard templates, and sector benchmarks and best practices for effective financial management. Key takeaways were:

- Planning and budgeting defined.
- Situation analysis (SWOT).
- V-MOST and SMART.
- Budgeting considerations.
- “What if” scenarios.
- Operational reporting.
- Dashboards.
- Benchmarking.

The daily theme for Wednesday was “Academic Leadership.” Few, if any, private sector leaders are more knowledgeable or better known for academics, student services, and education delivery than Dr. Gary Carlson. Dr. Carlson is retired as the chief academic officer for ITT and an experienced consultant and adviser to career colleges. Gary’s interactive and very practical presentation was not a lesson on theory but rather how to put his suggestions into practice on the campus.

Participants who wanted to improve learner success, student retention, attendance and satisfaction; now possess the tools to do so, through a practice that encourages ongoing

development for faculty and staff. According to Dr. Carlson, “The heart of any school is the ability of the teachers to make it worthwhile for the student.” Dr. Carlson, yet another LI graduate, advised LI students to hire properly and carefully, correct expectations, and set meaningful targets, through appropriate, ongoing professional development.

Following Dr. Carlson was Martha Lanaghan, Founder and CEO of The Sparrow Group. Martha presented “Retention Strategies to Ensure Graduation” and “Student Services.” Participants experienced the foundations of measuring and improving student retention, through the key levers that can be used to increase engagement, improve student success and drive continuation through to graduation. Students engaged in interactive independent and group work to identify key success measures and build actionable insights into improving retention for their campus(es). For more valuable information and insights see “Debunking the Myths of Student Retention” by Martha on page 9.

To aid the sector-wide salient goal of more graduates with satisfactory employment, Martha also discussed the core concepts that are essential to managing a team of career services professionals. Again, students participated in individual and group discussions to identify best practices that drive improved employment outcomes. Participants also learned about the three key measures that make up the tripod of actionable insight for successful placement outcomes. As with all lectures, this session focused on practical, actionable concepts that participants can use immediately on their campus.

Thursday, Day Four’s theme was

“Compliance and Government Relations.” After the usual recap of the previous day, Noah Black, vice president of public affairs with APSCU, presented the class with ideas and advice on communications and public engagement.

Noah encouraged private sector leaders to forge relationships with stakeholders at the federal, state and local level. These activities include interviews, personal contact, campus visits, graduation speeches, and face-to-face interaction with policy makers.

Noah’s key takeaways were:

- Strengthen public speaking and presentation skills.
- Foster effective relationships with legislators, employers, community organizations, and the media.
- Understand the business of today’s media outlets and distribution models.

Noah reminded students that reporters want: timeliness, prominence, proximity, human interest, celebrity involvement, and counter-intuitiveness, to be first. Noah’s advice on how we work with the media: create content and share with media outlets, who in turn create content for their readers.

Jeanne Herrmann, chief operating officer at Globe University/Minnesota School of Business and 2014 ACICS board chair, spoke next on the importance of “Compliance and Ethics.” Students were asked to bring a copy of their current code of ethics statement. The codes were discussed in a group assignment. Jeanne’s presentation and best advice to leaders included:

- Create an integrity statement/mission.
- Develop an outline for creating a culture of compliance.
- Identify possible ethical obstacles by departmental area.

- Define auditing methods for compliance assurance.
- Use group problem-solving skills to respond to case studies.
- Develop a template for a code of ethics statement (based on prework).

With assistance from Jeanne on ACICS and accreditation issues, Mike Santoro, education and compliance consultant, retired national director of compliance with Career Education

C o r p o r a t i o n
and past ACICS
commissioner,
spoke on the past,
present, and future
of accreditation
and the “triad.”
Mike and Jeanne

Noah reminded students that reporters want: timeliness, prominence, proximity, human interest, celebrity involvement, and counter-intuitiveness, to be first.

have upcoming articles in CER’s edition on accreditation. A common theme of the week, Mike cautioned LI students to “inspect what they (and their accreditors) expect.” Mike’s presentation covered:

- Definition of accreditation as a voluntary process of peer review.
- Different types of accreditation: institutional versus programmatic.
- Gatekeeper role for US DOE Title IV.
- Accreditation actions: Gaining, maintaining, and loss of accreditation.
- General overview of the accreditation process.

Rob Wolf, president of Galen College of Nursing in Tampa Bay, lectured on “Community Relations” and the importance of getting out of the school and into the community. Few campus leaders are clear about how much time they should invest in community outreach while balancing the day-to-day activity of the campus. Rob Wolf’s suggestion was to utilize a 75/25 percent split, with 75 percent

on-campus and 25 percent in the community. Rob's key takeaways were:

- A college can enhance its credibility in a geographic area.
- Senior executives embrace both their college's efforts but also the needs of the community.
- Natural progression from the community results in thinking that your college is one of the logical solution providers.

TC Wolfe, associate vice chancellor of government relations at Keiser University, spoke on "Government Relations-Federal and Regulatory, and State Government Relations and Grassroots." TC briefly covered what

Rob Wolf's suggestion was to utilize a 75/25 percent split, with 75 percent on-campus and 25 percent in the community.

is happening on Federal legislative and regulatory fronts and how to understand key policy issues with respect to gainful employment.

TC and the group then discussed the fact that "all politics is local" and brainstormed techniques in how and what to do when interacting with Members of Congress. APSCU has an extensive resource at its GRASSROOTS ADVOCACY CENTER, which is APSCU's comprehensive resource center and is designed to ensure you have all the necessary information needed to build and maintain relationships with elected officials in your district and state.

Grassroots resources include:

- Contacting your member of congress and other elected officials.
- Host a campus tour.
- Meet with your member of congress and other elected officials.
- Background documents.
- Sample campus tour schedule.
- Campus tour checklist.
- Sample invitation.
- Sample press release.

TC's best advice was to make contact before the election, before there is an "ask" needed, just to foster concrete, long-lasting relationships. Personal contacts, fundraising events, graduation speeches, and other face-to-face contacts, at the local level, are the best ways to have our message heard in DC. TC will discuss this in detail in an upcoming issue of CER.

Mike Dakduk, vice president of military and veterans affairs at APSCU gave a powerful and timely presentation on "Creating a Military-Friendly/Veteran-Friendly Campus." Mike advised students that if we serve our military and veteran students half as well as they have served our country we will be fine. Our servicemen and women deserve nothing less. Mike's key takeaways were:

- Campus leaders understand the three drivers for defining a military-friendly/veteran-friendly institution: government, media and higher education groups.
- Campus leaders are able to differentiate between the media lists that rate or rank military and veteran-friendly institutions.
- Campus leaders should reference appropriate guides and toolkits highlighting best practices for serving student veterans, service members and their families.
- Campus leaders understand the federal and state governments roles in oversight and regulation that is contributing to the definition of military/veteran-friendly.

Still full from Thursday night's celebration dinner, students met Friday morning and discussed the final agenda item: "Bringing It All Together – What Works, What Doesn't." After Dave's final daily recap, a panel of career college campus leaders answered questions and shared advice.

The Campus Leadership Panel included Robert Herzog, LI graduate, session moderator, senior vice president of finance & administration with Berkley College, and 2014 APSCU board chair. Panel members were Brandon Barnhill, president Keiser University Tampa; Mike Santoro, former president, International Academy of Merchandising and Design, retired national director of compliance for Career Education Corporation, active education/compliance consultant, and former ACICS Commissioner; and Greg Pace, DeVry University Tampa Metro dean.

Tired, but inspired with new knowledge and suggested tactics to try “back home,” the group discussed several issues in wrapping up the training. Panel members responded to several questions, such as:

- What have you found to be successful traits and habits of a successful campus leader?
- What are two things that you think are important to be focused on daily at the successful campus?
- How has campus leadership changed since you first entered the industry?
- What advice would you give future campus leaders?
- How does your organization best support its campus president?
- Any important ‘lessons learned’ that you would like to pass along to our future leaders?

Before the awarding of diplomas, each student gave his or her own personal graduation speech,

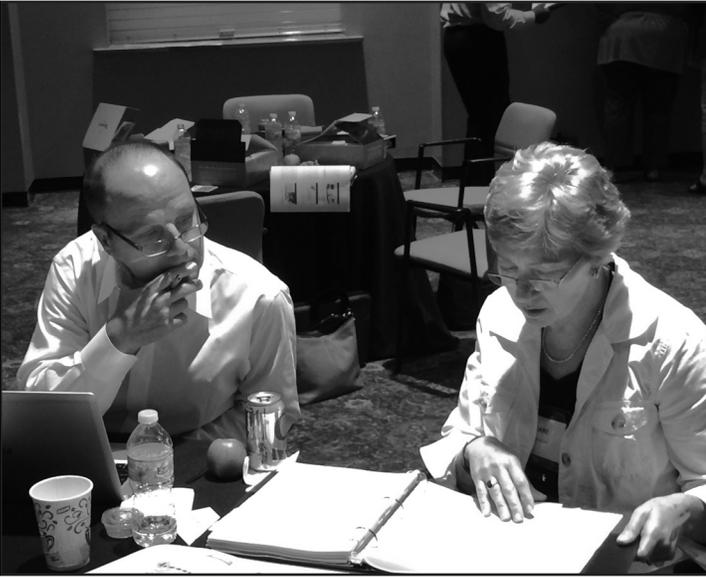
reinforcing learning and focusing on practical application from the fantastic and comprehensive training. Twenty happy graduates joined the distinguished alumni of the APSCU Leadership Institute, as they accepted their credentials.

Dave thanked everyone, students, speakers, APSCU, the Keiser hosts, and a special thanks to Diane Miller, and then ended much

the same as the week started stated, with a common theme of sound advice. Dave challenged all to use what was learned and never forget to “give back to the mountain.” From the noteworthy panel, teachers, moderator, and each other, students were advised to: 1) stay focused on and proud of what matters — STUDENTS; 2) trust but verify by inspecting what you expect, 3) practice lifelong learning for themselves and their teams; and, 4) form a network of colleagues who share our common passion for career focused education and students’ best interests.

Contact information was exchanged; and, lifelong relationships were started with a new network of APSCU Leadership Institute graduates joining the hundreds who came before them. CER looks forward to next year’s event and to seeing you there as a student or teacher.

Form a network of colleagues who share our common passion for career focused education and students’ best interests.



David Pauldine and Diane Miller discussing the afternoon agenda for leadership participants.



Jason Pistillo, presenting on Effective Inquiry Generation.



Vince Norton discussing managing conversions through the classic admissions funnel.



Dr. Jean Norris presenting on Building and Managing an Effective Marketing and Recruitment Team.

Debunking the Myths of Student Retention

By Martha Lanaghan, Founder and CEO, The Sparrow Group

Student success has always been at the center of our mission, but retaining students is not as easy as waving a magic wand, and sitting back to enjoy high graduation rates. Tough choices, sometimes expensive initiatives and many hours of time and effort have been at the core of building initiatives that often garner weak or no results.

In the time I have spent on dozens of campuses across the U.S. and overseas, I have encountered a few myths that are held as “universal truths,” that are, simply put, *not true*.

1. We can save everyone!

The Truth? Some students will leave no matter what you do to assist them.

I like to think about the total student population in three groups: Group one will leave no matter what you do to assist them (probably 10-15 percent of your total population). Group three will stay, no matter how

tough things are (also probably about 10-15 percent of the total population). The middle group can be influenced to stay or go. The way you treat them, and how you support them, will have a direct impact on their ability and likelihood to persist to graduation.

 <p>10% to 15% will leave no matter what you do</p>	 <p>70% to 80% will be influenced by the way they are treated or because of your support programs</p>	 <p>10% to 15% will stay no matter what you do</p>
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The best use of our resources is to focus on those middle students – understand their risks and also what mitigations will help them overcome those risks, and then put your shoulder against those initiatives.

This requires insight in to your student’s risk profiles. If you have not already done it, pull several years’ worth of retention and drop information. Get a statistical resource to analyze the behaviors and characteristics that seem to have a close relationship to dropping and staying.



MARTHA LANAGHEN founded The Sparrow Group in 2010 to focus on improving student learning, retention and employment outcomes across higher education around the world. Today, her clients span multiple continents and The Sparrow Group team has impacted hundreds of thousands of student lives through innovative

programs that engage students. Her clients include Pearson, Knowledge Universe, University of Texas, Monash University (Australia), and more. Connect to Martha at: www.Linkedin.com/in/MarthaLanaghan, or contact her at Martha@SparrowGroup.biz.

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Some behaviors are obvious – missing class for two consecutive days, for example. Other characteristics are not so plain. Can you predict a student’s likelihood to withdraw from class based on their Expected Family Contribution (EFC)? What about the program they are studying? The number of transfer credits they bring to your school? Or their high school GPA?

If you know which characteristics are predictive, you then need to create mitigation strategies (for example, the low high school GPA might indicate that a student should have an academic coach, or a financial management class for high EFC student).

Ideas:

- Have you reviewed your orientation program lately to ensure that it is actually increasing the student’s ability to succeed? Or is orientation a “rundown of logistics, policies and procedures?” If it does not reinforce the student’s decision to choose your school, increase their confidence, or connect them to their cohort and their instructors – then it is probably not helping.
- What are your Academic Recovery processes (for SAP students)? In our research we found that the majority of students that went on SAP, never fully recovered and a rare few go on to successfully complete a program. However, with proper support (not just tutoring and/or a few phone calls), which includes a comprehensive action plan, and review of the student’s status – dramatic recovery-rate increases can be realized.
- The classroom experience is king. If you are going to invest in an area to support student success – the area to choose is teaching

– and back it up with teacher contracts that reinforce their roles and responsibilities in improving student success.

2. Effective student retention is expensive

The Truth? There are countless proven, high-impact initiatives that are free, or very low cost.

Yes, there are expensive initiatives that work. But there are also a number of *FREE* things that you can do at your campus to impact student satisfaction, engagement and retention. This became most apparent in a focus group we conducted on a campus in Chicago some years ago in an interview with a group of students that had persisted to graduation. When we asked what motivated them to stay, consistently the answers included, “because [my instructor(s)] believed in me.”

Ideas:

- Focus your next faculty in-service day on improving how faculty gives feedback to students. Make sure that all feedback reinforces the student’s confidence in their ability to succeed. Teach your instructors to be purposeful about telling students they believe in them.
- Learn student’s names. One of our clients required their instructors to be 15 minutes early to class for the first two weeks of every term. The instructor was to greet every student as they walked in the room, by name, and to “chit chat” with the class as they got settled in order to learn more about each of the students, and to make sure that the students were connecting with each other in the class as well.
- Keep your staff and faculty “in the know.” Develop a

comprehensive dashboard and regular, open communication to ensure that everyone on the team understands their roles and responsibilities, and the results that are being realized. Encourage regular communication between instructors and student support services so that students can proactively be connected to help when they need it – or even before they need it.

3. Our biggest attrition problem is attendance!

The Truth? No one drops out of school because of attendance! They all stop attending because of something else.

Attendance (or lack thereof) is a symptom, not an outcome in and of itself. If students fail to come to class it is because of some other force at work. It could be their busy life, their lack of motivation, their boring teachers, or anxiety over their ability to be successful (or any of dozens of other reasons).

Too often, we see schools that consider “current attendance” one of their key success measures – but tracking attendance is only helpful if you are also taking steps to understand *why* students do not attend. Of course, students will not always be forthcoming with the real reasons they are not in school – creating a culture of openness, and ensuring that your staff and faculty really *know* their students – are both essential components of understanding what is really going on behind the numbers.

Ideas:

- Ask students to exchange cellphone numbers with at least two people in their class at the beginning of every term. When a student is absent, ask one of their

peers to text them to make sure everything is OK, and to tell them that someone is taking notes for them.

- Talk to students about attending class within the framework of preparing for work. Instead of saying, “you need to be in class because we cover important material every single day.” We encourage instructors to say things like: “Your employer will expect you to show up for work every day. We want to make sure that you not only get a job when you graduate, but also that you are the first person they choose to be promoted at your new job – to do that, you need to show up every day, on time and be prepared for class.”

4. It takes time to figure out who is really at risk

The Truth? Students often tell us that they are going to struggle through important signals – even before classes start.

One of our clients asked us to look at all of their first-term drops for a period of time. What we discovered was that 100 percent of those students that dropped out during the first term, or failed to return for the second term, either missed or did poorly on their first assignment in at least one class.

That means that the school knew within 10 days of the start of class, which students were at risk. Schools could build an intervention program that got help for those students before they got so far behind that there was no way to recover.

Ideas:

- Analyze early warning signs – how quickly do prospects complete paperwork and deliver documents during the admissions process? Do they attend orientation? Do they participate in events on

campus before classes start? Are they present in class the first week? These are just a few examples – think about all your pre-start and early-tenure processes and the stories they tell about student engagement. When you have identified early indicators, develop mitigation plans for each signal and monitor their impact on retention and student success.

- Train your instructors to look for early signs of academic weakness and to notify student services if they believe someone is at risk.
- Ensure that students know how to ask for help, and a safe and easy way to indicate that they need help. One of our clients implemented a “SOS” program – their orientation program included the phrase, “Asking for help is a Sign of Strength – SOS.” Let them know that great employees ask good questions and let their boss know when they are in over their head – great students do the same thing.

5. More data is better

The Truth? Measure what matters (and only what matters) – then act.

Time and again we find an inbox full of spreadsheets, narratives and charts. The challenge is that very few people have been trained to convert the data they receive into *actionable information*. The temptation is strong to measure everything, and generate report after report. In an efficient, effective operation, there are only two reasons to track numbers:

1. Because you are required to by law or by your accrediting/regulatory agencies.
2. To inform action that creates positive change.

If you want to get more effective with data, try this exercise:

Step One: Invite every member of your leadership team to bring the reports they receive on a daily, weekly, monthly and quarterly basis to a meeting. Prior to the meeting, they should:

- A. Make a list of all the reports, and next to each report, list who publishes it and how often they get copied on the report.
- B. Identify the reports that they rarely read or look at – mark those reports “abandon?”
- C. Mark the reports that they briefly review with “scan.”
- D. Mark the reports that they utilize regularly and read thoroughly with “essential.”
- E. For every essential report, ask them to literally circle or highlight the information they use, and then describe the action they take as a result of seeing the information – what do they change, and how does that impact the desired outcomes for the school.

Step Two: Bring everyone together for an extended meeting (this should be your leadership team plus anyone from your IT/reporting team that will need to implement changes to the reporting). Each person gets a finite period of time (we would recommend five minutes) to describe what he or she uncovered with his or her review.

Step Three: The team should be able to identify an outcome or “prescription” for every report. The prescriptions will be one or several of the following:

- A. Stop producing the report altogether (hard to do sometimes, but often the best answer).
- B. Change the frequency of the report (go from daily to monthly, or from weekly to daily, etc.).

- C. Provide training on the data so that it can be well understood and converted in to action.
- D. Change the audience (distribution list) for the report to add or subtract people based on understanding who can really use the information.
- E. Realign the specific data on a report – combine reports, add or delete fields from a report, etc... to make it more user-friendly and more insightful.
- F. Create new ways to present the data (add trends, charts, new comparisons, etc.) to make the data more meaningful.

Step Four: Now that you have action plans for your suite of reports and data, the essential next step is to prioritize the changes and implement them!

Rinse and repeat as they say. If you conduct this exercise annually, you will regularly refresh the data you are reviewing, and you can get a great check on the impact that the data is creating.

6. Our processes and initiatives make all the difference

The Truth? The campus culture is likely the single biggest influence on retention (and employment) outcomes.

If your campus culture is student focused – which includes a concerted effort across the campus to ensure great employment outcomes, engaging classroom experiences and an attitude of always doing what is best for the student – you will enjoy higher retention rates, and you will see more word-of-mouth referral leads.

If, on the other hand, your culture does not always put the student first, and/or you have political infighting, a culture of fear and retribution, or a culture that does not reinforce and support employment outcomes –

students will sense this, and they will not be loyal to your programs.

Putting the truth to work

These six truths will mean different things to different campuses – certainly, in your environment, you will know best how to convert the truth into action to drive improved retention. Here are some questions to ask your leadership team that may help point the way to new initiatives, or modifications to current programs, in order to increase student engagement and retention:

Truth One: Some students' leave, no matter what you do.

- Take inventory of your retention initiatives (particularly those that cost meaningful time or money). How many of them are aimed at keeping students that would stay anyway? Are any focused on “saving” students that are likely to leave, no matter what?
- What is in place to identify key risk factors and raise flags when students show signs of struggle? How many of those programs specifically focus on the unique conditions for very new students?

Truth Two: There are countless proven, high-impact initiatives that are free, or very low cost.

- Can you quickly identify your most expensive retention initiatives (by both financial cost, and/or human resource costs)?
- Is there evidence that these expensive initiatives are working?
- Ask your team (all of your staff and instructors) what they could do to improve retention, offer small prizes for great ideas and immediately implement the free or low-cost ideas.

Truth Three: No one drops out

of school because of attendance! They all stop attending because of something else.

- While attendance is critical to track and is a clear sign of struggle or risk, what are you doing to understand *why* students are *really* missing class?
- Are you capturing “drop reason codes” for every student that leaves? If so, what percent of your drops are coded “attendance” (or similar)? If it is over 15 percent, challenge your team to get more information about why “attendance” students really left. Make it a goal to get that reason code to be less than 20 percent of the total drops. (if you cannot, it means your staff and faculty do not know your students, and are not talking with each other when a student leaves – someone on campus should know the student well enough to have some idea about why they stopped attending).

Truth Four: Students often tell us that they are going to struggle through important signals – even before classes start.

- What are you doing to identify at-risk students before they start classes?
- How quickly are you acting on important signs like missed assignments, tardiness, etc. early in the term?

Truth Five: Measure what matters (and only what matters) – then act.

- Ask what actions the team has taken that week (that day, that month), because of data they reviewed.
- Ask the team for evidence that

their actions are making a positive impact.

Truth Six: The campus culture is likely the single biggest influence on retention (and employment) outcomes.

- How have you (as a campus leader) reacted to bad news when it comes to campus performance? This says a lot about your culture.
- What do you do to reinforce the importance of employment outcomes? The more students see their education as directly linked to their dream of a new career, the more likely they are to stay – building an employment-centered is important.

Think of how you can challenge your team to reassess the programs and processes you have in place – do they support student success? Or are you doing what you have always done and expecting a different result?

As a place to start – dare to ask your leadership team some thought-provoking questions. Give them permission to question the status quo (if you are really innovative, you will offer a reward for the person who suggests the biggest practical change). To make sure people feel safe, let them know that no suggestion is off limits – you do not have to implement everything suggested that is part of the fun – get your team to go through the suggestions together and prioritize the selected few to be implemented. Then, measure the changes and celebrate the improvements.

Effective Inquiry Generation

By Jason Pistillo, President and CEO, University of Advancing Technology written by Martha McCormick

CER spoke with Jason Pistillo, regarding his presentation on Effective Inquiry Generation at the 2014 APSCU Leadership Institute. Pistillo, a graduate of the Leadership Institute was honored to be asked to present at this years' seminar.

As an alumnus of the Leadership Institute can you give us a few thoughts about the Institute?

I have lost track of how long ago it was, but maybe 15 years ago or more, I was a participant in the CCA Leadership Institute. It was a heralded program that my father before me had participated in

and was somewhat notorious and well regarded in the industry.

The tradition and legacy of the institute has always been impressive. I know that many people in our industry today associate themselves by who was in their leadership institute class. Last year I was honored to be asked to speak at the institute. One of my most promising, up and coming executives was in attendance. It reminded me way back when I attended; how our President (my father) presented while I was in attendance.

The institute has an "air" of tradition



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Jason has implemented innovative educational models and systems, designed real-time curriculum information structures and best-of-class intake systems, developed innovative curriculums, proved new learning theories and developed more young technology leaders along the way than most with twice his seniority. His commitment to lifelong learning, personal growth and development of his stakeholders culminates in his joy of educating future leaders in the fields of advancing technology.

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and to great extent I would consider it a right of passage in our sector of higher education.

What was something that you wanted the students to come away with beyond just inquiry generation 101?

I think there were a couple of takeaways that I wanted people to get. I do not think people really know what Effective Inquiry Generation means. Most people are always using the same canned reports and no one is looking at things differently. It was not about inquiry generation as much as it was about what effectiveness means in the first place. There were a couple of different variables I wanted people to examine. One I harp on is timespan, because I do not think very many people have looked at that.

There is a chain of custody, like there would be in evidence collection, from the first moment someone hears about you to the time they graduate. As you think about all the steps and if you really did a process map, I think there is a lot of discontinuity within that chain. You cannot just take this month's lead, this month's interviews and this month's enrollments and really get a true feel of what is working and what is not.

From there I think people need to think hard about the noise and competition in the different segments of their enrollment funnels. Finally, I think schools need to start using the data available to properly match the right enrollment counseling strategies to different types of students.

Can you explain the notion of cohort tracking and why it is important?

When I say cohort tracking, I mean looking at conversions that come from inquiries in a certain month. So, if it is August you might need to back up to January and look at the January inquiries and see how many have made it to conversion points in the eight

months since they inquired. Forget about the enrollments that came in January because they probably were not the same students that inquired in January. I know in my data, those who interview and those who enroll did not come from the inquiries in the same month. Just like you would look at cohort tracking on your retention statistic – those that came in and how many are still here – it is really applying that same model toward your inquiry management. What we have found is there are certain months that far outperform other months, but at a much later time. As a result, we have been able to shape our media spending and our inquiry spending to make sure that we are putting more resource into better months, and less resource into the poorer performing months.

If some of these inquiry sources are taking two- four months, what earlier indicators do you look at?

First I will say that our online program is very non-traditional and its mean inquiry-to-start is four months. I think it is longer than most people take, however I guarantee you it is more than a month for most schools, even the average career school. We develop and monitor a lot of the indicators. For instance, we can tell very quickly with warm transfer rates, so that is a good leading indicator. We have tried some sources where we are used to averaging 50 percent to 60 percent warm transfer rates and then they have an 8 percent transfer rate. That is a pretty good leading indicator that the source has problems.

The other thing we do is we have an application process, which is not the same thing as an enrollment. That lets us get a feel for what our end start rate is, because our yield does not move; it has been 40 percent of those that apply and get accepted will start, which has not changed in 11 years. That really cuts my decision making time down in

half; I know what is working and what is not because I have reliability on how correlated it is. For instance, in the inverse, the number of inquiries I get does not usually pan out to the number of enrollments. That can be all over the place in terms of overall conversion rate, as most people know, because the mix changes things. But the number of admitted students in my program is a very tight correlation to the number that will deposit and attend.

What are some of your better costs per start as best you can measure them based on the different media?

I will back up and say I just did an analysis on our cost per start and our conversion rate by state. It is something interesting by way of background on a school because we are national recruiters and we pull from all 50 states into our ground programs; I am not talking about online, but our ground programs. I found that there are some states that are running 30-35 percent conversion from inquiry to start (not the state my campus is located in) and some states are running 2 percent with the same media mix. We just found that out this week and that was an eye opener. I think that was a surprise that the state of origin mattered significantly, quite significantly.

Let us focus in on one particular media source. Tell us about your direct mail brochures and the investment you put into that.

First of all, we have a direct mail campaign. That is what most traditional schools do where they buy a bunch of names and then they do what is called college search. That is different from my collateral campaign. My collateral campaign is really my funnel campaign, which is a long sequence of information that flows out to inquiries.

Essentially, there are some inquiries that will decide to enroll because they talked to an admissions person

and the admissions person will be the one who told them about the program, features and benefits and provided the information they wanted.

But there is a significantly higher portion of inquiries that want to stay passive. A way to think about this is, when you bought your last car, chances are you spent more time on the website, investigating on your own, and maybe you even requested a brochure before you ever went into a dealership and talked to someone. By the time you did talk to someone, you probably had a really good concept of what you wanted. You wanted to test-drive it to see if you liked it, or you already knew you wanted it, and you just wanted to negotiate the best price.

While admissions serves a purpose, I think they are responsible for 50 percent of our students that show up, the other 50 percent are there through their own discovery of what the school is like. If you want to add another indicator to the track, it is the passive or stealth respondents that will apply or enroll without a warm transfer or initial call. That is very hard to track, because most people assign prospective students to an admissions adviser from the beginning. So you really have to go back and look at contact history and track whether this person ever actually talked to anybody when they inquired and actually look at what those end point conversions look like. We see that more than 50 percent of our volume does not come from the adviser.

You also talked about inquiry regeneration that was very successful. How would you describe that and what advice would you give?

We felt like a lot of our students just were not ready to do anything, and they wanted to be left alone. So we did a mailer after someone said I am not interested, stop calling me. It was an unobtrusive mailer that said, hey, it has been six months, thought I would

reach out to you and then we would send another mailer at 12 months. It is just a postcard and one of our best performing campaigns, because now they are ready to talk to someone. It is not that they were not considering your school – they just wanted you to stop blowing up their phone. Most people hate to be called on the phone. So I am not sure why we use that as our primary approach.

When you talk about noise what do you mean?

I have a particular magazine that I advertise in that nobody advertises in. When a student sees my school in there, they are inquiring about UAT and UAT alone. They are not seeing 10 ads and running through and inquiring about them all. They see us and say I was not even thinking about this school, but now I am. That is what I mean when I mention noise, at least at the inquiry stage. Noise also matters later. If the average number of schools that your students apply to is four, then I can pretty much guarantee your yield rate – in other words, your conversion from an admit to a deposit will be 25 percent. That is what I mean by noise.

So it matters at an advertising level in terms of initial response, but once you get beyond that, it becomes the idea that the noise I am talking about is lower in our funnel. I do not think people look at this very much. I will give you an example: You get high school counselor inquiries where you have a presenter go out and present to a group of students. Chances are they are the 10th presenter that has been to that class, because high school teachers bring out a bunch of different schools. So that is kind of a high noise system.

Which would be predicted to have a much lower yield.

Correct.

Maybe not lower inquiries, but lower yield.

If you have an efficient way to mine that system, then you are great. We have built a lot of success over having high volume, low yield, but very efficient mining systems. So high volume systems are horrible for one-to-one conversion campaigns where you have to have an admissions person really talk to everybody. But if you have a very simple approach for students in that high volume who can just inquire and find out by themselves, then it might be a great solution.

On this data mining and all these numbers that you mentioned, are there any particular systems that you use?

We are on CampusVue right now, but we are moving our marketing and admissions to Salesforce, as our CRM should be up any month now. Something people should know about me is that I used to be a database guy, so I can write my own queries out of CampusVue right out of the backend. That is pretty helpful because, the way it usually would work is you have a decision maker ask an IT person to pull a report and they look at it a week later and then they go oh that is curious. Then they ask another question and a week later they get another answer. That level of frequency is not conducive to learning.

When I look at the data, I go that is interesting and within a couple of minutes I have an answer which might lead me to spend a couple of hours and really get to the bottom of something and learn a lot about the system. That is not going to happen if you have a one-week delay or level of abstraction in your ability to look at data. What I predict is that in the next five years, there will be a whole new field of individuals who are true analysts. I do not see a lot of people who are analysts, but an analyst, in my opinion, is just shy of a six figure person who knows how to write queries, but is not an IT guy. They are

someone who knows enough about the overall process and flow – who can make informed decisions based on them.

A data miner that is a marketing person also?

Yes. Imagine a vice president of marketing who can write his or her own queries. They would be pretty powerful if they actually knew how to do regression analysis themselves. If they knew how to do SQL programming, pivot tables and advanced Excel analysis, they would be very, very valuable. I see that being something that is coming – implementing and seeing the promise of CRM, seeing that there is a lot more data available than they had, and maximizing the new analyst role.

I think what Jean Norris said is we enroll the 5 percent of the 100 that want to be enrolled and the other 95 percent go someplace else. But you gave a couple of illustrations of different students based on different factors in actually modifying the admissions process. Tell us a little bit about how you do that.

I think to Norris' point, there is one persona that represents five percent who know they want to enroll. We work hard to get them to enroll, instead of just letting them do it. We probably only enroll three percent of those students because we turn off two percent trying too hard to enroll students who were already coming. That is normal human dynamic. We pay attention to the people who like us.

What we do not do properly is, say there are five or six archetypal students in my funnel. A sample archetypal student might be one who really wants to go there, but has not figured out how to pay for it. If we know that we have someone who just needs to figure out how to pay for school, it is easier to figure out the proper approach.

We are not going to just call and set up an interview like everything else: We are going to make sure we talk to that student about how people pay for school and how other students in the same situation have done it. We actually show that person a sample award and possible scholarships.

But the problem is, we do not necessarily know that we have a student who needs financial information and he or she is financially sensitive. That is not readily available right now. So what you have to do is make some inferences. We do not have the data systems there yet, but they are close, and it looks like this:

This person has opened and read every single financial email you have sent and have already submitted his or her FASA. Things like that are important indicators. If he or she is reading every email you send about financial aid and has not read one email about the faculty, I think it is pretty directional on where the interest is.

At the same time, chances are you can see who the students are who want to come already, because you can tell by their questions and by their inquiry cards. The one thing I do, which most people do not, is I read all 25,000 inquiries that we get a year – I read them every day. They will tell you right on that form, I am coming. So those should be dealt with differently from the rest. If you have students who are ready to enroll right now who are a fit and qualified to attend your institution then let them enroll – get out of their way.

If you have people that are never going to start at your school, focus your energy on the middle tier. If you have students who are on the cusp and are considering you and a different school, maybe those are the people you should focus on.

We do this in leadership: Your A players you reward, your B and C players you put your energy on getting

them to be A players and your D and F players you just let go.

What would you recommend the small to medium-size school owner does to take a deeper look at this data if they do not have that analyst and do not have that new software?

I will credit Raymond Todd Blackwood (who was working for us at the time) for coming up with this recommendation. As I said, I read all the inquiries that come in. It does not take me very long, five minutes in the morning to read all of them that came in from the day before.

Blackwood developed a series of flash reports that I get every day, a breadth of information that comes to me in an email. For instance, John Smith inquired 370 days ago and was originally interested in this, talked to this person, just had an interview and his main concern was this. Again, it takes me five minutes to read it and over time it creates a learning environment.

What most people do is they have a problem, they go investigate through data and they create a cause and effect solution. They look up answers and then respond. Our culture is about learning from data every single day.

So my recommendation is to create a large series of easy to read flash reports that you read at the end of every day or in the morning, that has detailed information. Not just a name, but detailed information like: Who went on a tour, what was their rating on the tour, what was their likelihood to enroll, who was their tour guide and maybe what media source or state they came from. It becomes a sentence for every action and it is not that hard. One is a list of all of the interviews that happened, one is the list of all the applications that came in and one is the list of all the students that deposited. It has their name, who they talked to, how long ago they inquired, what their inquiry

source was and what their major was, for example. That would be the best way I could say for leadership to really get a feel for what is happening in the interim without a sophisticated analysis or software.

You are the University of Advancing Technology, so what advancing technologies do you see, or what do you see as the future of school marketing, perhaps other than just mining the big data?

CRM is going to allow for the mining of the big data at a level that marketing and admissions officers are not doing now. It will let us do that personal marketing that I described, so we can create archetypes and do a good job communicating with them directly. I see that being a big deal.

If you are getting really far out into the future, I will say that social media as we know it today is a trend that is dying out. If you look at the demographic of Facebook now, it is 25-years-old and above. What I am seeing right now with the younger people is they are going much more for one-on-one. For the past 10 years it was really easy for people to create their own fame and have 1,000 friends on Instagram and Facebook. While that will still stay in the mainstream for a while, the younger population coming up is not really into that fake fame anymore. I see that dying off quite a bit and the pendulum swinging the other way where people are going to want more privacy.

The other broad trend I am seeing is a lot more communication with photos. People are communicating more with photos than words and I think that is an interesting dynamic as well. I do not think marketing and admissions channels have tied into that.

Perils of the Pack Rat: Document Retention Practices to Help Avoid Compliance Concerns

By Robert B. (Ben) Walker, Jr., Esq., Senior Associate, Ritzert & Leyton PC

Why should document retention be an active topic of discussion?

A school's internal documents and files (including electronically stored information "ESI") provide the primary means for it to justify decisions made regarding its students and graduates, its disbursement of financial aid funds, and its ongoing compliance with laws and regulations. Such information is therefore critical to ongoing operations. But even though this data can sometimes serve as a shield against allegations of wrongdoing, any school working to "keep everything, just in case" is fighting a losing battle.

Currently, so much ESI is created so quickly that, even though raw data storage costs are decreasing, it nonetheless becomes very costly to retain all of this information. Remember that you will also incur additional costs (including substantial time) to manage and organize the data you retain. This type of data management and organization is a difficult, time-consuming, and

detail-oriented task. It also requires cooperation between IT staff (who know how the data are stored from a technical perspective) and various staff members in those departments who actually create the data (and who

As part of that discussion, schools should also be talking about data deletion policies, such that outdated information which no longer provides a benefit to the school is not retained.

therefore know what it is and how it should be stored for efficient use in the future). But what if you cannot effectively identify and gain access to the data you have stored when you need it? Simply put, you cannot just "keep everything" and leave it at that because a later inability to access the detail you may need will render your work to retain data useless.

Schools are obligated to retain certain data for certain periods of

time. Data retention should therefore remain an active topic for regular discussion to ensure compliance. As part of that discussion, schools should also be talking about data deletion policies, such that outdated information which no longer provides a benefit to the school is not retained. It can be a very liberating feeling to send old data to the trash because you and your school can focus on the more important tasks that confront you each day.

Who typically requires data to be retained?

From an institutional perspective, the primary entities that require the retention of records are the U.S. Department of Education, institutional accreditors, and state licensing agencies. In addition, the institution itself may require the retention of certain records. If so, self-imposed internal policies and procedures, including both official and unofficial practices, will impact retention obligations.

It goes without saying that schools should become familiar with data retention obligations owed to outside entities. Failure to abide by these requirements can easily result in one

(or more) of the responsible entities taking negative action against the school.

Notice that if your school imposes, whether officially or unofficially, a data retention policy that is more expansive than required by an applicable law, regulation, or rule, you must then abide by that more expansive policy (at least until such time as you change it). Consider this hypothetical:

The Department of Education receives a complaint from a student that she attended Herndon University, but did not earn the grades which appear on her transcript. She alleges the school falsified grades so it could continue to disburse Title IV funds on her behalf. The college receives a subpoena from the U.S. Department of Education’s Office of Inspector General (“OIG”) seeking “all records that relate to student grades for students enrolled in the HVAC and Automotive Technology programs for the period 2010 to 2012.”

Herndon University’s official policy is that grade information is maintained in its electronic database. However, Herndon’s



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faculty members observe an unofficial policy of keeping (in file folders, boxes, and other locations) each exam, test, or assignment which leads to the student's final grades. Herndon's campus president informs regulatory counsel that the school will just print out grade information from its database and provide those records in response to the OIG's request. His basis for that position is that the database, consistent with the school's official policy, provides the source of the relevant information.

Is that a sufficient response to the OIG's request?

It is likely that the campus president's idea, even though it is a cost-effective and efficient solution, would prove insufficient. That is because Herndon's faculty have observed an unofficial policy of keeping all of their supporting documentation and that data are, in fact, responsive to the OIG's request. Indeed, this implicates a more troubling concern: if Herndon's faculty cannot locate that detailed information for all students (because, for example, the information has been misfiled or kept in a haphazard fashion), the Department might conclude that the information in the database is not accurate.

In this circumstance and moving forward, the best practice would be for the school to make a determination, based upon input from and consensus-building with impacted staff members (here, Academics and IT, primarily) regarding its official policy for the retention of day-to-day academic records and then implement that policy.

Of course, the school would need

to follow up to ensure staff members in fact abide by the official policy. For instance, Herndon's official policy might be that the school's official record of grades are maintained in its database and that faculty members should retain their supporting documentation (e.g., copies of assignments, quizzes, tests, etc.) for six weeks after the end of a semester (to allow for students who might contest their grades), at which point they are destroyed. The school should then work with faculty members to assist with the initial organization of academic supporting documents, the retention of those documents for six weeks after the end of the semester, and then the destruction of that data consistent with institutional policy.

What types of data are usually subject to retention requirements?

School records most often appear in the following formats:

- Electronic records (i.e., ESI), such as network data, data on employees' individual PCs or devices, email, and database information.
- Hard copy records, or information kept by the school in paper format.

Broadly speaking, the types of data a school must retain usually relate to student information (e.g., academic transcripts, attendance information, etc.); financial aid records (e.g., ledger cards, ISIRs, award letters, verification information including relevant supporting documentation, R2T4 calculations, etc.); and institutional records e.g., banking records/receipts (especially those related to financial aid disbursements), corporate organizational documents, etc.

Strategic considerations for when a school develops data retention/destruction policies

It is critical to closely consider how you want to implement data retention/destruction policies,

Based on experience, those institutions that try to hold onto every piece of data related to its operations “just in case” do themselves a disservice, to the point of potentially creating litigation and/or compliance concerns where none might otherwise exist.

including what the potential ramifications might be in the future (both short- and long-term). Failure to get staff at various levels engaged and potentially to consult regulatory counsel regarding institutional

obligations can have negative consequences.

Some ideas you might consider as you refine or develop your policies include:

- What is your overall ability to manage the volume of data you retain?
 - Is it accessible? Is it organized? Can you use it efficiently?
- What are the likely costs?
 - Hardware and software? IT infrastructure/staff? Third-party service providers?
- What are the common sense considerations we need to take into account?
 - Why should the school keep this data?
 - ◻ Can it be used as a sword against us? Or as a shield?
 - When might a broad data retention policy help? How might a data destruction policy help us avoid allegations of wrongdoing?
 - Does it make sense to keep certain data just because you can?
 - ◻ Is it practical to do so?

Why does a data destruction policy make sense?

Implementing a compliant and effective data destruction policy can provide a great deal of benefit to an institution. First, it allows the school to free up space for current information so that it can limit the need to expand its IT infrastructure. Second, it provides assurance to staff that they can (and indeed must) get rid of outdated information that is no longer subject to any retention requirement. Although this necessitates discipline (and may result in resistance from those who find comfort in keeping everything), it can prove liberating by allowing staff to focus on the present and future, rather than the past. Third, an effective data destruction policy can prevent a third-party (such as a Plaintiff’s counsel) from engaging in a “fishing expedition” wherein they look at old information to see what problems they can identify in retrospect. As a corollary, this can also substantially reduce litigation costs simply because there is much less data available for review. Fourth, the institution can limit potential liabilities by retaining what is necessary, even as it destroys what is not, such that each and every aspect of the school’s operations does not remain subject to scrutiny in perpetuity.

Based on experience, those institutions that try to hold onto every piece of data related to its operations “just in case” do themselves a disservice, to the point of potentially creating litigation and/or compliance concerns where none might otherwise exist. Avoid the “pack rat” mentality and embrace the fact that non-essential data which is destroyed opens up opportunities to improve operations and focus on what exists now, rather than what occurred a year ago.

The importance of the litigation hold

Increasingly, institutions are being sued by former students and employees based on alleged noncompliant practices. Such litigation often threatens a school's ongoing existence and viability, if only because of the costs involved in mounting a defense. In the event of litigation, it is quite important that the institution retain any and all data which may be relevant to the lawsuit. Failure to properly retain information can subject an institution to significant negative consequences (including the potential for sanctions) during the litigation.

Most often, litigants ensure proper retention of documents by instituting a "litigation hold," which ensures relevant documents are kept and not destroyed. The school will typically notify employees, in-person and/or in writing, about their obligation to keep (and not destroy) certain types of information. In addition, taking action from an IT perspective to lock down ESI and prevent its deletion (or take steps to create appropriate backups such that ESI cannot be permanently lost) is also important.

Based on experience, those departments usually most relevant to litigation in the education sector include: human resources (e.g., personnel files, payroll records), financial aid, admissions, and registrar/records management. Staff

in those departments, in particular, should be aware of data retention requirements and promptly informed if the institution must institute a litigation hold.

This also means IT staff must be nimble and able to act quickly to secure ESI (including email) and prevent its deletion. The school's management should also be positioned to quickly identify individuals likely to possess relevant information so that IT staff can then focus particularly on securing ESI for those persons. In any event, the institution should certainly work closely and cooperatively with counsel in managing these issues.

Final thoughts

Simply put, institutions that neglect data retention obligations do so at their own peril. Failure to establish an adequate data destruction policy can, similarly, cause substantial problems (as well as increasing costs and creating inefficiencies) because of the necessity to store, organize, and manage the incredible volume of ESI created on a regular basis. Take the opportunity now to assess your organization, consult with counsel to ensure compliance with regulatory requirements, and implement an effective policy which protects both necessary institutional data and the institution itself.

****FOR REVIEW PURPOSES ONLY****

The following does not constitute legal advice or counsel. No individual or institution should act (or refrain from acting) based upon this information and without consulting legal counsel familiar with your (or your institution's) specific circumstances.

Summary of U.S. Department of Education Document Retention Obligations (Current)

- **Current Obligation for Records Related to School Eligibility**

- o Current copies of records related to its application for Title IV funds (generally, three years from the end of the award year to which the information relates).

- Examples include ECAR; FISAP; accrediting and/or licensing body reviews, approval, and reports; state agency reports; audits; program review reports; and self-evaluation reports.

- **Current Obligation for School Fiscal Records**

- o Records demonstrating proper use of Title IV funds, including a clear audit trail substantiating how funds were received, managed, disbursed, and returned.

- Examples include Title IV transaction records; bank statements for all accounts containing Title IV funds; student account records (e.g., ledger cards, R2T4 calculations, etc.); institution's general ledger and subsidiary ledgers for Title IV transactions; and Federal Work Study payroll records.

- **Current Records Related to**

- **Student Eligibility**

- o Current copies of records substantiating students' eligibility for Title IV funds (generally, retain at least three years from the end of the award year during which the student last attended the institution).

- Examples include ledger card; academic transcript; cost of attendance data; SAP documentation; verification documentation; etc.

- **Fiscal Operations Report and Application to Participate (FISAP)**

- o Retain for three years from the end of the award year in which the report was submitted (e.g., retain a FISAP for the 2014/2015 Award Year until June 30, 2018).

- **Perkins Loan Repayment Records**

- o Retain until the loan is satisfied, which means that the retention requirement will vary from borrower to borrower.

- **Perkins Loan Promissory Notes**

- o Retain for three years from the date the loan is (a) assigned to the department, (b) canceled, or (c) repaid. Thus, the retention requirement will vary from borrower to borrower.

- **Direct and/or FFEL Loan Records**

Related to Student Eligibility (for Title IV Funds)

o Retain for three years from the end of the award year in which the student last attended (and not just the last award year in which he/she received a disbursement).

• Other Title-IV Related Reports/Forms

o Retain for three years from the award year in which the student last attended (and not just the last award year in which he/she received a disbursement).

Other Record Retention Issues to Keep in Mind

- o Student academic records (typically must be retained in perpetuity).
- o Specific accrediting agency and

licensing body requirements (vary by entity).

- o Are your records readily available in the event you receive a request for information from the Department or an accrediting agency?
- o If you do not have records for a certain time period, can you establish why that is proper and consistent with the requirements?

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Student Retention

Practices That Motivate Students to Become Academic Partners Who Persist

By Sally Leslie, Director of Institutional Effectiveness, DeVry College of New York

When the going gets tough, many of our students, even the most able, give up or barely get by. Yet, we can create an environment where both persistence and passion flourish. Let us take some time to examine some of the hurdles to persistence and then some realistic solutions to student attrition. We will also explore principles and practices that contribute to a learning-centered culture and ultimately, to increased persistence.

Worldwide, educationalists are searching for the 'holy grail' that links what teachers, administrators and college leaders do with increased student engagement, persistence and graduation rates. However, while

we examine the data, an essential component is often forgotten – the vital connection between emotion and cognition that ultimately leads a student to persist. This connection has been widely established and yet has little or no place in the conversations

Passion is what makes a class great and without it; the learning experience is mediocre at best.

around admissions, rigor, persistence and raising graduation rates. In order to bring the power of this emotional and cognitive connection into our dealings with students, we can use motivational dialogue and behavioral



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science that will ultimately turn our students from ‘consumers’ and ‘customers’ into *partners who persist*.

As director of institutional effectiveness at DeVry College of New York, I am often asked to measure and quantify the passion for teaching and learning that happens in the classroom; this is extremely hard to do. As Emerson said, “Passion, though a bad regulator, is a powerful spring”; and in the world of education, many

The knowledge gap has shrunk, and instead of seeing our students as distant and on the receiving end, we need to partner with them to affect change within our organizations.

would argue, without passion there is no deeper learning; no true grit. Passion is what makes a class great and without it; the learning experience is mediocre at best. Why, after

all, would anyone give up the life, to which they and their family (perhaps for generations) have become accustomed, for a new direction, a risk, a daunting new beginning in college if what they experience there is mediocre? Therefore, as teachers, leaders and administrators, it is our job to passionately persuade our prospective students to join and partner with us. It is also our life’s work to persuade them to stay.

So how much of our day involves this act of persuasion – convincing others to give up something they value (their time, money, present lifestyle) for something we want them to have (an education, the career of their choice)? The answer is quite startling – 7,000 professionals in the U.S were polled and, on average, it was found that we spend 41 percent of our working day persuading others. That is roughly 24 minutes per hour, per day! (Pink, 2013)

Why then, if we spend so much of our time persuading, is higher education suffering so much? We should have an over abundance of

applications, should we not? We do not, because people are simply choosing not to come to college anymore. Could this have something to do with the outdated ways we are using to persuade students to come and learn with us? Overwhelmingly, the answer is, yes. Let us take a look at what used to work in education and no longer does, and what will work for us now in order to raise our game.

Information parity

We all know the old educational model: In the classroom, it was the sage on the stage, lecturing for most of the time with a short window for questions and answers at the end. In the admissions suite, it was the admissions adviser with the information at their fingertips, strategically sharing what they deemed fit for student consumption, the unseen and hallowed executive leadership team of invisible and powerful movers and shakers. This is all part of an old and defunct paradigm that survived in the age of *information asymmetry*. This was an age where the instructor or adviser was the fount of ultimate knowledge and held the keys to education while the student was seen as the passive learner; the empty vessel waiting to be filled; the customer who was always right yet treated as just that – a transient customer. There was a huge imbalance. This model no longer works to either entice or retain the students of today.

This is what works, embracing the new age of *information parity*. In this new era, we find that students now have access to practically as much information as we do and some of them also know how to access it more effectively than we do. This radically changes how we communicate with students and the rules of the game then profoundly shift. First, when we accept that we do not necessarily

have more information or a persuasive advantage to get a student to join us, we must accept that a motivated student may know the same amount, if not more, about what our institutions have to offer than their teacher or their admissions adviser does. The knowledge gap has shrunk, and instead of seeing our students as distant and on the receiving end, we need to partner with them to affect change within our organizations. For example, when you fly with any airline, you may be asked to take a customer satisfaction survey. How convinced are you that your experiences, comments and thoughts will affect much change at all? Do you even take the survey? More often than not, we do not take the survey. Yet what if you were asked to partner with that airline, to become part of a voluntary advisory committee who would meet with company executives to discuss improvements and areas of opportunity? What if that company wanted to invite you to use the skills you use everyday to help them better serve their passengers – you being one of them? Would you want to fly with them again, and again? This is what we need to practice in higher education today. We are now free to partner with our students in the classroom – even flip those classrooms so that lectures can be viewed online at the student’s leisure outside of class time, while the real meat of the class – the discussion, problem-solving and writing help could be done in person. Students can become part of our academic advisory boards, providing the perspective of what it is like to be a learner at our institution; partnering with fellow students and faculty in order to continuously improve curriculum in terms of technology, team work and social media. In addition we can invite students to let us know what it is they are being asked for in the workplace in order to inform our lesson planning

and help us to remain current in our material. Yes, students can inform and also join the inside track on curriculum development.

The three steps to realignment

We cannot truly, fully convince someone else of anything. True learning is *their* discovery of knowledge with our guidance; this means we need to partner rather than lecture. In order to realign ourselves with our students as partners, there are three steps we can follow, the first step is: perspective. We can shift our perspective to theirs; drop some of

our “power” for a moment and see the world from their point of view. Here is a useful exercise which you may wish to

In order to realign ourselves with our students as partners, there are three steps we can follow, the first step is: perspective.

use with students or colleagues – this exercise helps in realizing that, by exercising perspective we can banish preconceptions we have about others and begin to form partnership in order to increase learning and persistence.

Perspective Exercise: Step one – place a number of images of modern day items on a screen at the front of the room. These items may include, say, a traffic light, a pizza, a ballpoint pen, a light bulb, an airplane or the auditorium of a movie theater. Step two – ask people to turn to the person next to them and begin a dialogue about one of the items on the screen. The catch is that one of you is from the year 2014, and the other person is from the 1600s. The 21st century person will need to explain their chosen item – what it does and how – to a partner with a 17th century worldview. Try it. You may be surprised at what you experience. As a 21st century person, what did you have to do with knowledge you take for granted in order to explain the item to someone who has absolutely

no concept of it at all? Perhaps this is an extreme example, yet what this exercise does is foster mindfulness of one partner's perspective within another's communication. This method works toward partnership, conflict resolution and discovery for all involved and creates trust on the part of the learner. As we know, in order for a student to persist, there needs to be trust and respect built between student and teacher.

Until relatively recently our problem was accessing information, these days with the mass of information flowing at us from every direction, our new challenge is to sort through it.

The second step in realigning ourselves with students as partners is: resilience. The guidelines for this step will work for teachers, students and also

administrators in any of our day-to-day challenges in education. Resilience calls for us to monitor our positivity. This is not to say that negativity should be completely banished; there must always be a balance. Yet, in these challenging times we may experience high staff turnover, high student attrition or low enrollment and we must exercise resilience. Here is how: We can work out intelligent ways of saying, "no" to the following three questions.

1. Is this **lasting**? A bad response to this may be something like: yes. I have lost my edge/ability to teach/my leadership style. I have lost my ability to inspire. A more resilient response may be: no. I was a little flat today because I have not been sleeping very well/one of my students/team members is feeling down and this altered the dynamic of the group slightly.
2. Is this **widespread**? A bad response to this may be something like: yes. All of these students/colleagues are hard to deal with at this institution/none of these

teachers care about me or where I am coming from. I should quit! A more resilient response may be: no. This particular individual/class/teacher was challenging and/or negative and it made the situation feel worse than it actually is. That is all.

3. Is this **personal**? A bad response to this may be something like: (from an admissions adviser) yes. I messed up the college tour and it put the student off of enrolling today – that is why they left – because of me. A more resilient response would be: Yes, it could have gone more smoothly, but the real reason the student left was that they really did not feel ready to commit today. I will follow up with them tomorrow.

The third step toward realignment is: synthesis. We can curate and synthesize information from our experiences to make sense of the world for our students/colleagues. As Albert Einstein said, "If you can't explain it simply, you don't understand enough." We have access to vast amounts of material, which we want to pass on to our students – we need to find the essence of what we want our students to know and discard what is irrelevant. The rest we can partner with them to discover.

Until relatively recently our problem was accessing information, these days with the mass of information flowing at us from every direction, our new challenge is to sort through it. Nonprofit, technical and social media expert, Beth Kanter says that we need to practice, "content curation." This means that with this mass of material at our fingertips, we need to follow these three simple steps to truly be a part of the information parity age.

First, we can *seek* the right information – put together a list of best resources for ourselves/students/colleagues. Scan these

resources regularly (weekly or monthly depending on update frequency). Next, we can make *sense* of the information assembled by creating a blog about it; creating annotated lists of these sources. Finally, we can then *share* the information with our institution. The golden rule for synthesis of information is: We can no longer be precious about what we (think) we know – in this age of information parity, those days are over and no longer serve us or our students.

Once we begin to shift our perspective to partnership with our students we build trust with them. This way, we can then begin to better model the passion we have for what we do and keep them coming back. In seeking to motivate colleagues or empower and retain students we can share with them what we are passionate about. Let them know how we became involved in what we do and why. Tell them what we do on a regular basis to keep our interests alive and model how we do this. We can also share with students how we have persisted through challenges. Many students in the for-profit sector of higher education are the first in their families to attend college. Many of my students have often been surprised when I tell them that I was also the first in my family to go to college as well. We discuss what this can feel and look like on a daily basis and, more importantly, how this can be a great resource for grit and fortitude. This is an example of sharing challenges and how they can be overcome. We can model for our students in so many ways in addition to the way we teach or dress. Modeling persistence for our students can create a sense of urgency in them to gain focus. We can ignite curiosity in our students by showing them how anything can happen if they are courageous (even when their esteem feels the lowest); they can transform (even when they

feel stuck) and keep their head even when all-around them are losing theirs and maybe even telling them they are selfish or crazy to go to college.

Let us quantify

We have so far looked at how gaining perspective promotes empathy amongst students, teachers and colleagues. We have also seen that this means modeling the rigor with which we as educators have had to persist in the face of challenge. All of these

qualities show that our institution cares and this is of utmost importance. The personal touch of individualized attention to

students and colleagues will always set the great colleges apart from the merely efficient. Learners become interested when they see that information is interesting and useful to them; when they see that this information will promote opportunity for them to grow and change. This promotes engagement and, persistence follows. To state all of this in an equation we could say:

$i + o = e$. Where: i = interest; o = opportunity and e = engagement.

We can also use a different algorithm for promoting a caring partnership with students:

$(e + p) + r = c$. Where: e = empathy; p = perspective; r = rigor and c = care.

In other words, we actually do have the formula for promoting persistence; it is simple and pivots around building engagement and care through partnership.

Ask irrational questions!

Formulas, you may be thinking, are all well and good for motivated students or colleagues. What about

Once we begin to shift our perspective to partnership with our students we build trust with them.

those who are harder to reach, jaded and closed off to most reasoning. There is a way to engage them too. Behavioral psychologist, Michael Pantalon says, “Rational questions tend to be ineffective in motivating resistant people...try irrational

Rational questions tend to be ineffective in motivating resistant people...try irrational questions.

questions.” We can use this technique with our unmotivated students and colleagues; it works

wonders. Here is how: *(before reading this, you should note that Marcus, the fictitious student here, is consistently late and careless with his assignments)*

Teacher: I see you have not turned in the assignment for week three, Marcus. What is going on?

Marcus: I just did not do it.

Teacher: I see. Hey, Marcus, I have a question for you – on a scale of 1 to 10 (1 being absolutely never and 10 being I will sit and do it right now), how willing are you to do this assignment?

Marcus: (a little taken aback by the question) ...um...I dunno, 3?

Teacher: Why did you not choose a lower number?

Now, what is Marcus left to do is defend why he did not choose 2, 1 or even zero? This is using behavioral psychology to turn the tables on the seemingly unmotivated student to validate his willingness to *do* his assignment rather than living in the ‘do not’ of why not.

Following this, we can then encourage the formerly unmotivated individual to ask themselves ‘can I do this?’ and then list all of the reasons why they *can*. In his book, “To Sell is Human,” (Riverhead Trade, 2012)

Daniel H. Pink encourages us to adopt the mindset of what he calls, “motivational interviewing.” He encourages us to think like Bob the Builder by asking ourselves, “Can I do this?” And answering, “Yes, I can!” rather than simply repeating the mantra, “I *can* do this,” which ultimately has no substance. With motivational interviewing we are, again encouraged to list the reasons why we *can* do something, thus building resilience and confidence from within. This is a great tactic to motivate students and colleagues alike.

By opening up the conversations we have with students and colleagues to invite their reasoning and inner dialogue we also open up to opportunity for growth and building partnerships. Formerly, we may have simply stated the facts: If the assignment is not done or made up by this date and time then x points or credit will be deducted, or worse. When we do this, we are trying to predict another’s motivations and subsequent behavior and often we are mistaken and do not have the full picture. When we try to predict a student or colleagues behavior or reaction to something we overstate the importance of evaluating their personality and understate the importance of their situation. By asking irrational questions and teaching motivational dialogue, we are open to possibility and this leads to increased opportunity for all involved.

Passionate engagement

Passionate engagement with the act of partnering for learning is an essential ingredient in the winning equations we looked at earlier. Angela Maiers, award-winning educator, speaker, consultant and professional trainer, known for her work in literacy, leadership and global communications says that passion in education embodies, “The ability

to adapt and think critically. The desire to ask serious questions about ourselves and the world. The ability to analyze complex issues to find answers to those questions. The drive to take intellectual risks. The pursuit of a strong and deep foundation of knowledge. The confidence to connect and communicate in a global dialogue. *These are not only issues of skill, but also issues of passion.*"

Leading Australasian speaker and trainer, Karen Boyes writes about what she calls the, "Sixteen Habits of Mind." These habits are ways of thinking and responding that teach how to behave intelligently. Boyes says that a habit of mind is, "...knowing what to do when we are unsure or unclear of the next step or when we don't know the answer. A habit of mind means having a disposition toward behaving intelligently when confronted with problems, the answers to which are not immediately known: contradictions, dilemmas, inquiries and uncertainties...21st century learning is not about gathering information but about knowing how to act on it, knowing what questions to ask of it and being able to thinking critically about content and origin. The habits of mind give us the behaviors that shape effective inquiry and encourage independent learning." In the conversation around motivating and partnering with our students in higher education, we can use the 16 habits of mind to model passion, grit and form partnerships. Here are the 16 habits and here are some suggestions of how to implement them with our students and colleagues in higher education.

1. **Be persistent:** Model persistence in the consistency with which you meet all challenges, classes and meetings. Talk about where you have had to be more persistent in the past and the results you achieved through that persistence.
2. **Listen with understanding and empathy:** We can use the exercise

in perspective that we looked at earlier, either with colleagues or in the classroom to regain a sense of empathy with our partners in education. Try to drop the power for a moment and encourage the use of motivational interviewing.

3. **Think about your thinking:** Ask yourself if you are approaching this latest situation from the perspective of information asymmetry (old model)? Or information parity (new paradigm)?
4. **Question things, pose problems:** Poet, Wendell Berry wrote, "When we no longer know what to do we have come to our real work and when we no longer know which way to go we have begun our real journey. The mind that is not baffled is not employed. The impeded stream is the one that sings." Help your students to ask the right questions. Some of them may be unaware of the purposes, classes, composition or goals in questions. They may not realize that what they are asking will call up a highly complex answer and we need to partner with them to discover how to decipher and understand the answers. We

With motivational interviewing we are, again encouraged to list the reasons why we can do something, thus building resilience and confidence from within.

need to work with them to uncover strategies for thinking rather than telling them the way to think – this must be a discovery on their part in order for deeper learning to happen.

5. **Think and communicate with clarity:** Here, we can go back to Kanter's strategy for content curation. We can seek, sense and share information with our colleagues and students in order to be clear and purposeful.
6. **Create, imagine, innovate:** Our students and colleagues each have a unique ability to generate

solutions to problems differently. It is our job to listen and tap into their unique talents and partner with individuals to best use their abilities. No matter what those abilities are, we can innovatively find ways to make them work in the classroom and the boardroom.

7. **Take responsible risks:** People who are more flexible tend to be the biggest risk takers. We can create safe environments in our classrooms where exploration of concepts is, at first, much more important than knowing whether answers are correct or not. We can encourage our students and colleagues to share with their peers how they arrived at certain answers; explore their process. Risks will never initially provide certainty and yet it is by taking the risk of, say, speaking out in class, that a student can begin to explore new ways of finding answers and banish the inclination toward doubt.
8. **Think interdependently:** We are social beings and therefore we can work very well sharing and partnering in teams. This also requires the ability to learn how to listen to others empathically and take constructive criticism as an opportunity for growth. In partnership we give our time and energy to responsibilities that we would quickly grow tired of when working alone. Collectively, and in realization of individual strengths within a team, we are more powerful. This is also the essence of information parity.
9. **Manage impulsivity:** In the Bible's Book of Isaiah (28:16) we have some good advice, "He that believeth shall not make haste." Effective teachers and learners spend a large amount of time and energy listening to others and also to their own inner dialogue. Try to hear what is being said *beneath* the words being used by students or colleagues and take time to respond (if appropriate.)
10. **Think flexibly:** This takes us back to the exercise on resilience. We can find intelligent ways of answering "no" to questions such as: Is this lasting? Is this widespread? Or is this personal?
11. **Strive for accuracy:** One of the most lasting lessons we can impart to students and colleagues is to model persistence (often termed, "grit"). Accuracy happens over time and with persistence. Some students may turn in messy, unfinished or unedited work. They are more nervous about getting rid of the assignment than checking it for accuracy. This is where our modeling is most powerful and we can show them ways to slow down and value the process rather than giving up, or, even the opposite: seeking perfection at the first few tries.
12. **Apply past knowledge to new situations:** Sometimes students and colleagues will approach a new task like it is the very first time they have done it. Perhaps this is a task they have previously attempted and yet failed or struggled with. We can encourage students and colleagues to say, "this reminds me of..." or "this is just like the time when I..." We can then encourage them to explain what they are doing now in terms of their previous experiences. They call upon their store of knowledge and experience as sources of support, and use former successful processes to solve each new challenge.
13. **Gather data through all senses:** Encourage the use of all learning modalities with students and with colleagues. We all think and learn differently and this should always

be taken into account.

14. **Respond with wonderment and awe:** When we partner with people it is much easier to relate and encourage reflection, curiosity and a dialogue with the world. From this standpoint we can help students to see the worth in *all* the subjects they study by using a holistic approach to learning. Bring in unusual ways of seeing math, writing or business into the classroom and experience the responses. For instance, why not use a hands-on (kinesthetic) method of teaching poetry by exploring the five senses? Or try focused breathing meditation at the start of a business class to encourage students to feel centered before a mock interview? Move with these new ways of discovering and partnering and work toward your collective goal.
15. **Find humor:** So important! Finding humor and a sense of humanity will always encourage deeper learning and build trust in the classroom.
16. **Remain open to continuous learning:** The greatest teachers will tell you that they never stop learning. They will also tell you that they learn from their students all the time; this may not be in terms of subject knowledge, but it is through sharing the shifting and changing classroom with students that teaches us to be open, enjoy and be passionate about what we do.

Conclusion

And so, here we end our journey in hopes of moving forward to stronger and deeper partnerships with students and colleagues. Our students are the producers and partners with whom we can spark interest and open

doors to opportunity. Here are some affirmations, which we can share with our student partners, to encourage them to persist with us through the toughest of challenges:

- I *can* manage feeling overwhelmed – We can have some anxiety, even anger, and still act appropriately.
- I *can* be all right even if others around me are not – We can act appropriately, even if the people around us are not.
- I *can* do things even when I do not want to – We do need to follow certain rules in certain situations.
- I *can* be productive – I am a producer, **I am a contributor, I am a powerful partner in my own education.**

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Why School as a Service is a Key Weapon in the Growing Battle for Students

By Martin Lind, Education Vertical Director, Velocify and Corey Greendale, Senior Vice President, First Analysis

The worlds of traditional and proprietary schools are starting to collide with growing frequency. Competition for the same students is accelerating among not-for-profit and private sector schools that used to serve two distinct customer bases. And the rivalry shows no sign of easing.

So what changed?

Responding to both market and regulatory pressures to improve outcomes, private sector schools are increasingly looking to recruit students with stronger academic preparation and funding sources outside federal

financial aid: A population that historically has been more likely to attend not-for-profit schools.

Not-for-profits are facing mounting pressure from declining numbers of high school graduates, reductions in state funding for public institutions and shrinking endowments at some private institutions. Additionally, market pressures are making it more challenging for not-for-profits to offset enrollment declines with higher net tuition prices. Forced to consider new sources of revenue, not-for-profits that were historically uninterested in enrolling nontraditional, working



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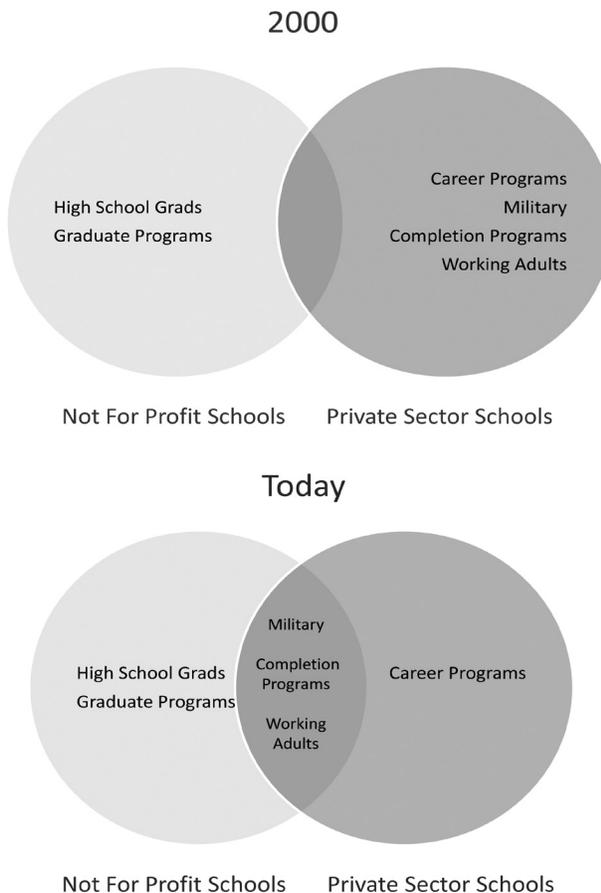
adult students are adding online degree and certificate programs to serve these student populations. A growing number are making the transition with the help of school-as-a-service (SaaS)¹ firms that provide not-for-profits the necessary technology, capital, and marketing infrastructure to build and operate an online program from scratch.

The growing online battle for nontraditional students

Today, three-quarters of public and private institutions say that online degree or certificate programs are very important or somewhat important to their institution’s total enrollment.² As a result, the target populations of private sector and not-for-profit schools are increasingly overlapping, illustrated by the recently announced partnership between Arizona State University and Starbucks.³ Under the agreement, ASU and Starbucks are both providing financial assistance to certain Starbucks employees who attend ASU Online programs. ASU, in turn, uses Starbucks as a marketing channel. Until recently, this type of arrangement was largely the domain of private sector schools, and the ASU/Starbucks partnership is a sign that the not-for-profits are not just a looming threat to private sector schools but are already directly competing.

Not-for-profits turn to SaaS to navigate unfamiliar waters

The approach of partnering with a school-as-a-service vendor is growing in popularity among not-for-profits that are capital-constrained and unable to make the large up-front investments in marketing, technology, and admissions needed



Online classes, together with pressure on enrollment and budgets, have made some traditional schools more willing to consider enrolling student populations that were historically of limited interest to them, such as working adults and military veterans

to grow online programs. SaaS provides not-for-profits a solution, to the otherwise time-consuming process of building from scratch a professional admission process, expertise, and systems focused on the nontraditional student. SaaS providers use internally developed or third-party learning platforms, enrollment management software solutions, best practices,



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joining First Analysis in 2000, he was a development analyst at Systema Corp., where he designed training programs

and in-house expertise as the foundation of outsourced programs tailored for each client school. Perhaps the most interesting benefit of partnering with a SaaS firm, however, is that it provides strategic perspective that can help not-for-profits navigate the unfamiliar waters of non-traditional student markets and better compete against private sector school market incumbents.

What is School as a Service?

School as a Service (SaaS) is a specialized niche that focuses on helping traditional institutions outsource enrollment and other services to reach students outside their historical base. In addition to recruiting services, SaaS firms provide not-for-profits the necessary technology, capital, and marketing infrastructure to build and operate an online program from scratch and are generally compensated on a tuition-share basis.

Threat, opportunity, or something in between

With the help of SaaS providers, traditional schools are quickly becoming skilled at recruiting non-traditional students, enabling them to encroach on some programs that private sector schools have traditionally dominated. The resulting increases in competition are already being felt, and pressure is likely to intensify for some segments within the career school category. Here is our assessment of the potential impact.

Ground-based, career-focused, certification programs

One determinant of potential impact on a career school from the growing not-for-profit competition is whether the school's programs can be easily offered online. If the answer is "no," new competition from not-for-profits is less likely to have a meaningful effect. For example, we see little threat for ground-based, career-focused, certification programs like beauty schools and schools offering programs in truck driving or auto repair.

If a school's programs can be or already are offered online, there are a few other factors to consider.

Two-year associate degree programs

The competitive environment for private

sector schools offering two-year associate degree programs is not shifting drastically, because their most significant competition comes from community colleges that have always served the working adult market and have always offered (generally) lower tuition than private sector schools. With budgets to publicly-funded higher education getting cut or remaining flat, most community colleges are not in a position to expand their offerings to compete with the private sector schools, and most SaaS vendors are not interested in low-cost programs without national appeal, so the impact here will likely be modest.

Private sector schools offering bachelor programs

These programs are likely to experience increased competition from similar programs offered by traditional schools on their campus or – more likely – online, for the reasons discussed above.

Regional competition

There is an emerging debate on whether the competitive impact of increased online program offerings is global or merely regional. While many first assumed offering online degrees would totally eliminate geographic barriers and open up a market of a global potential student base, there are some indications the impact might be more regional than global, with students preferring to attend schools based close to where they live, even if they are enrolled in fully online programs. In fact, research firm Eduventures asserts that the reality is, most online providers do not extend beyond their immediate region.⁴

How SaaS can help private sector schools

When private sector schools were only competing against other private sector schools in their region, students' consideration set was smaller than it is today. Prospective students decided among private sector schools that did admissions outreach because most not-for-profits were not focused on an outbound

⁴ <http://www.eduventures.com/2014/04/prioritize-focus-evolve-five-critical-issues-facing-higher-education-leaders-2014/>

contact strategy. Not-for-profit schools that hire SaaS vendors, however, now have an aggressive outbound contact strategy that, when paired with the brand equity of a traditional school, can be formidable.

Fortunately there are several very viable options for affected private sector schools to stay ahead of the game by improving their admissions strategy.

azurewebsites.net/), Pearson Embanet (www.embanet.com), Synergis Education (www.synergiseducation.com), 2U (www.2u.com) and The Learning House (www.learninghouse.com) help schools grow enrollment by providing technology, capital, and marketing and pedagogy expertise to create and build online programs from scratch. While the bread and butter of these SaaS companies have historically

been not-for-profits, there are instances of providers partnering successfully with private sector institutions as well.

Consultants

A full service admissions consultancy offers strategy and admissions training and more. This type of firm can help align skills, processes and training, provide access to a dedicated team of marketing specialists with subject expertise in higher education, provide an assessment of the admissions team based on secret shopping, assess compliance with current regulatory trends, apply industry best practices, and provide other

		Changes in the Competitive Environment		Recommended Response to the Competitive Environment	
		Bachelor or Graduate	Associate or Certificate	Bachelor or Graduate	Associate or Certificate
Can your programs be easily offered online?	Yes	Competition from a broad array of not-for-profits intensifying: a trend likely to continue.	A few new not-for-profit competitors entering the market.	Differentiate, build brand, and consider partnering with providers who can enhance enrollment	Competitive environment may not be changing drastically, but consider adding online programs to grow market opportunity.
	No	Competitive environment not shifting radically, but students becoming more price-sensitive.	Competitive environment not shifting significantly.	Continue building brand and consider new programs and marketing approaches to grow mind share in local market. Evaluate ROI to the student and tuition price point.	Build employer relationships, perhaps with assistance from third-party providers, to enhance student outcomes and ROI. Continue building brand and consider new programs and marketing approaches to grow mind share in local market.

How is the environment shifting and how should you respond?

Admissions process and systems improvements can drive enrollment increases. Such gains in efficiency generally fall into three categories. In every instance, due to the key differences between serving the needs of private sector and not-for-profit schools, private sector schools should vet vendor qualifications to ensure deep experience in the career school industry.

School as a service firms

Career schools facing increased competition might consider engaging an outside SaaS firm to help grow enrollment. School-as-a-service firms like Bisk Education (www.bisk.com), GlobalHealth Education (www.gheprograms.com/), Greenwood & Hall (gnhnet.

services. Consultancies like Enrollment Resources (www.enrollmentresources.com) and Norton Norris (www.nortonnorris.com) are leaders in this space

Software solutions

Another alternative is to optimize the admissions function and processes with career school focused enrollment management software. Firms offering admissions optimization software leave the enrollment and marketing strategy up to the school but can provide significant guidance around best practices for enrollment success. Most schools can ask their student information system vendors if there is a way to optimize the enrollment module to better compete

Picking the right School as a Service Partner

"When searching for a partner, consider the best collaborations are those that are built on trust and a mutual respect for what everyone brings to the table. Choose a partner who complements your areas of weaknesses, and who is as passionate about your mission as you are." -- Todd Zipper, CEO of SaaS provider The Learning House, Inc.

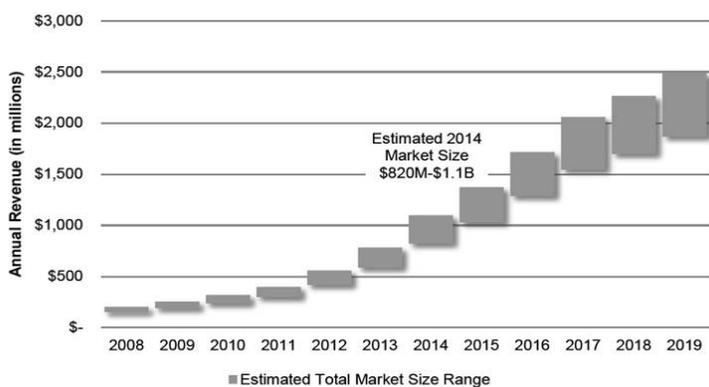
"Every partner you select is either pushing you forward or holding you back. The best partners have the leadership capacity to proactively approach you with opportunities or challenges; how you respond to these issues could create a lasting impact." -- Dr. John Hall, CEO of SaaS provider Greenwood & Hall

Source: <http://velocify.com/blog/education-leadership-innovative-leadership-lessons-from-education-experts/>

for students. Alternatively, private sector institutions can get a package that specializes in admissions. These systems include Talisma and Velocify.

All signs are that competition will continue to intensify as sophisticated school-as-a-service providers help not-for-profits extend their offerings beyond their legacy traditional-

Estimated School-as-a-Service Industry Market Size



Source: First Analysis estimates.

First Analysis expects the school-as-a-service industry to continue its robust growth over the next several years from an estimated level approaching \$1 billion at present.

student market. But agile proprietary schools have an opportunity to grow by continuing to innovate and build differentiated brands and value propositions. For some proprietary schools, staying ahead could also mean supplementing their admissions functionality or partnering with consultants, SaaS vendors or software solutions for increased agility.



A Research Agenda for For-Profit Colleges and Universities

By Guilbert Hentschke, William G. Tierney, & Mark DeFusco, Pullias Center for Higher Education, University of Southern California

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At first glance, the topic of a research agenda for for-profit institutions may seem to be a rather narrow, technical issue, of concern largely to those closely affiliated with those institutions—at most, some of those who work in them, who regulate them, who study them, and maybe even some of those who take courses in them. Yet, higher education today so influences the overall wellbeing of the United States, that the direction of one entire sector of it has consequences for everyone. At the individual level,

higher education plays opposing roles among us: for some an organized and accessible set of stepping stones to a better life and for others a series of

America's declining leadership in education exacerbates this problem and reframes it from one of "us vs. them" to "all of us." So, why is a "research agenda" so important for this sector of higher education?

stumbling blocks, difficult, sometimes impossible, to surmount in the same pursuit of that better life. America's declining leadership in education



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exacerbates this problem and reframes it from one of “us vs. them” to “all of us.” So, why is a “research agenda” so important for this sector of higher education?”

For-profit institutions have existed in society for over 150 years and educate more than 1 in 9 postsecondary students today, yet we know relatively little about them. Everyone will agree that this sector has grown over a short period of time into a substantial component of American higher education, but then the storyline diverges.

Some of us “know” that these institutions have emerged in importance at a critical time in America’s history, when needs for higher and more innovative levels of postsecondary education have rapidly eclipsed the capacities and interests of traditional public and private nonprofit colleges. They provide education services especially to those students that have few other options, improving not only their life chances but those of the communities

in which they live. Further, these institutions do it at a lower cost to taxpayers than traditional institutions. Without their unique access to capital and the resulting capacity provided by for-profits, the education levels of many, and quality of life of all, Americans would be measurably lessened.

Others of us “know” that these for-profit entities, by virtue of being for-profit, are motivated primarily by profits. Unlike traditional colleges, the profit motive induces senior managers, if they can, to cut corners, dilute quality, and otherwise reduce operating costs in order to ensure adequate returns to their investors. This for-profit condition (an ability to distribute profits to investors rather than being required to plow them back into the institution) exists in all businesses, but the potential for these institutions to take unfair advantage of their customers is particularly severe in education for two reasons. First, it is extremely difficult to objectively measure “high”



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parameters of college preparation programs for low income urban youth. He teaches graduate courses on curricular theory, administration, policy, organizational behavior, and qualitative methodology.

Tierney brings with him both administrative experience as an academic dean at a Native American community college in North Dakota, and cross-cultural insight from Peace Corps work in Morocco, as well as a year in Central America as a Fulbright Scholar. He received the Distinguished Research Award from the Association for the Study of Higher Education (ASHE) for his work. *CHANGE* magazine recognized him as one of 40 “young leaders in the academy.” He is chair of the University Committee on Academic Review, a member of the Provost’s Committee on Strategic Change, a member of the University Committee on Promotion and Tenure, and a member of the University Grievance Committee.

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and “low” quality in education and some of these for-profit institutions are targeting the most vulnerable and least savvy consumers of education. Second, the cost of for-profit education to students can be higher than at many public or private non-profit institutions.

Both characterizations have extended storylines, each with limited data supporting its arguments—with each leading to a different conclusion. On the one hand, many students, especially poor and minority students, have completed programs and secured better-paying employment as a result. Therefore, for-profit institutions are worthy of no more public oversight than are traditional institutions, especially given their lighter draw on taxpayer dollars. On the other hand, many of the same students are not completing programs, and are burdened with large loans they cannot repay, so the government should target this sector with regulations and oversight because it is uniquely susceptible to fraud and abuse, especially given their students’ disproportionate financial burden.

In the contest between these competing narratives, the Pullias Center for Higher Education sought

to move beyond hyperbole by confronting each narrative with the other. Five among us agreed to

construct a set of arguments each of which examines the for-profit sector from a unique perspective. Daniel H a m b u r g e r ’ s paper, “Developing a Private Sector Colleges and Universities (PSCU) Research

The following research agenda addresses what we believe to be the most pressing and fundamental policy issues affecting the scope, cost, quality, and accessibility of for-profit higher education, and by extension, all of higher education, in the United States.

Agenda,” staked out the major elements that in effect constitute the logic, structure, and supporting data of the first narrative. Laura Perna’s “What We Might Learn from Research about Traditional Colleges and Universities” examined the research on traditional institutions with an eye toward identifying insights to guide a research agenda on for-profit colleges and universities. Kevin Kinser’s “What We Know From Research About For-Profit Higher Education” examined the other side of that coin, examining the distinctive features of the structure, governance, organization, students, and performance of for-profit institutions. Su Jin Jez’s “What Data Exist That



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Might Be Useful to Do Research on For-Profits” shifted the discussion from institutional generalizations to data—sources, access, and their potential for addressing relevant research questions. Bob Shireman’s “What We Need to Know” bookended Daniel Hamburger with an argument that forms much of the basis for the second narrative.

In late April we then had a convening of approximately 30 individuals to discuss and debate the issues. Our

The intention is to foster innovation while simultaneously acknowledging the existing regulatory structure of higher education and the effects of institutional cultures.

discussions together over two days were provoked by these papers from our colleagues, and our conclusions and agenda followed from our collective review and critique of subsequent drafts, crafted and revised by three among us. We are not and never were of one mind on this topic, but through dialogue we have reached a consensus that the following research agenda addresses what we believe to be the most pressing and fundamental policy issues affecting the scope, cost, quality, and accessibility of for-profit higher education, and by extension, all of higher education, in the United States.

Priority one — How well do for-profit colleges perform?

This most fundamental of research questions remains difficult to answer for a variety of reasons. The research and policy community lack agreement on what constitutes academic production in higher education, the degree to which specific measures of academic production should apply to all or only some colleges, and the degree to which all, or only some, students should be included in these metrics. “Performance” here includes four types of institutional outcomes: (1) what do students learn, (2) what

proportion of students successfully graduate, (3) have institutions prepared students for employment, and (4) are students capable of repaying loans they incur to attend college.

A primary focus on performance, of course, is not limited to institutions in one sector, to students of one type, to programs of one level, or to one set of majors or concentrations. A primary focus on performance draws each institution toward clarifying and communicating its mission and distinctiveness. Alone among the wide array of higher education metrics, performance measures are of fundamental importance to more constituencies than other higher education measures, including present and future students, public policy makers, funders, accreditors, and employers. Given the diversity and complexity of higher education, it is implausible that many measures can be reasonably applied across all institutions, programs, and concentrations. At the same time, if an institution wishes to claim to prepare students for X, then that institution should be encouraged to gather and report on its performance in X, regardless of how “unique” its program is, which sector the institution belongs to, what types of students it serves, or any other distinguishing feature of that institution.

The nature of the research here falls into two broad categories: (1) design, development, testing, and routine gathering of new and refined data that can serve as proxies for the four types of performance (including degrees, certificates, and credentials); and (2) incremental research and design work on public policies that seek to pursue societal priorities for higher education such as access, affordability, and quality. Included in the first is the testing of measures that account for population

differences and assessing the impact that such measures have on improving performance. Advances in the first will fuel improvements in the second.

Improved measures of performance will contribute to improved research on many related areas of higher education policy and practice that are associated, implicitly or explicitly, with performance, including the research priorities presented below as well as much of the current and future negotiations involving the shape of higher education's oversight and public support.

Priority two — What changes would simultaneously increase the likelihood of future “non-traditional” adults enrolling, graduating, and finding meaningful employment while, at the same time, reducing taxpayer and student costs?

This question involves research which is different from that directed at data creation and use in priority one. It is an innovation and design problem, no less sophisticated than R&D involving micro-circuitry or bioengineering. The intention is to foster innovation while simultaneously acknowledging the existing regulatory structure of higher education and the effects of institutional cultures. It would include identifying promising initiatives that are under consideration, under development, or recently under way; tracking their initial impact; identifying the features that appear to contribute to their success and failure; and identifying their applicability to broader-based populations.

These initiatives would be characterized by unusual business and academic models, innovative practices, and novel as well as well-established performance metrics. They may be operated as single-institution public, nonprofit, or for-profit entities; or cross-sector, partnership, or joint-venture entities.

Their viability and novelty would be evaluated against existing practices and performance.

Priority three — In what ways do for-profit colleges function differently from traditional nonprofit colleges and universities?

Presumptions about the inherent differences in institutional behavior across sectors are too widespread and dramatic to ignore. The questions pertain to the perceived differences in governance and decision-making in the different postsecondary sectors.

Widely recognized

examples include the inability of private providers alone to produce sufficient quantities of largely “public” goods (“private market failure”), and corresponding

inabilities of public providers alone to cater to consumer tastes or to innovate (“public market failure”). Across different industrial groups individual firms are often found in all three sectors, sometimes providing very similar goods and services, sometimes not, and sometimes providing critical services to each other across sectors. By remaining unexamined, presumptions about the answers to this question fuel both of the dueling narratives and retard policy progress.

Two different sub-questions are interwoven here. First, are there fundamental biases associated with sector location in higher education, e.g., are for-profits unusually opportunistic, innovative, etc. relative to institutions in each of the other sectors? Second, if so, are those unique attributes advantages that can and should be exploited (e.g., for-profit access to investor capital and

The inherent value of this line of research lies not just in the ability to uncover possible differences and similarities in organizational incentives and behavior, but also to test the limits of identifying and sharing best policies and practices.

provision for student convenience) or disadvantages which can and should be prohibited or otherwise governed somehow (e.g., for-profit guile and opportunism).

The inherent value of this line of research lies not just in the ability

Our recommendations and subsequent actions are based on the premise that many different kinds of actors are needed to advance this research agenda and that very few of these actors will be located in any one institution, even any one type of institution.

to uncover possible differences and similarities in organizational incentives and behavior, but also to test the limits of identifying and sharing best policies and practices. For example, most public and nonprofit institutions are not

likely to entertain the idea of creating dozens of small learning campuses sprinkled across metropolitan America like it has been the practice among several large for-profits.

Priority four — What might be done to improve the collective, productive interface between institutions of higher education and the present and future workplaces?

For over a generation, the primary rationale provided by all students for pursuing higher education across all sectors has been to enhance employment prospects. Yes, there are other legitimate, widely recognized reasons for pursuing a higher education degree, but contribution to employability is the single most influential driver in the higher education marketplace, and it looks like it will be so into the foreseeable future. Having said that, an understanding of the dynamics and rapidly evolving nature of work is rudimentary at best. Combine this with an only somewhat better understanding of the rapidly changing higher education landscape, and the education-employment uncertainties

exponentially explode.

Unlike the first three priorities, this line of research seeks to work backward from employment to preparation, doing so at two levels. One is more macro, seeking to reveal more explicitly the nature of the wide array of transactions that occur as individuals traverse between worlds of schooling and working. The other is more granular, examining higher education programs and institutions that appear to address the education-employment nexus in novel, unusually productive ways. These would, of course, include career-oriented for-profit institutions in general, but would seek also to include institutions from other sectors that are demonstrating distinctive and potentially promising pedagogical approaches that productively interface education and the workplace (e.g., Northeastern University, Drexel University, and University of Maryland University College).

Now what?

We intend these four priorities to be interpreted more as a recipe than as a menu. They are neither mutually exclusive nor collectively exhaustive of the possible array of important research agendas in higher education. We believe, however, that sustained academic work on these four research questions can, over time, fundamentally improve the effectiveness of higher education in America. But how best, then to pursue these four research agendas?

Different organizations and people will have varying levels of enthusiasm and capacity for pursuing this agenda — just as people from differing backgrounds assembled to produce this agenda. Our recommendations and subsequent actions are based on the premise that many different kinds of actors are needed to advance this research agenda and that very few of these actors will be located

in any one institution, even any one type of institution. And each institution will ultimately decide for itself how best to participate. Senior managers at for-profit higher education institutions and their affiliated organizations (trade groups, accreditors, regulators) are critically important participants, and so are academics, governmental officials and policy makers, and leaders in civic and educational organizations. At the same time, individuals will have to decide whether and how to participate.

At the USC Pullias Center for Higher Education, we intend to serve as a convener of individuals and groups to pursue these areas, and to create and curate a website dedicated to collecting, reviewing, and sharing any

portions of our work and the work of any others that appear to bear on any of the four research questions. We also intend to revisit how to think about for-profits in general. The provisional taxonomies that have been developed seem to us insufficient. Our intent is two-fold: to feature and foster academic work on for-profit higher education aimed at answering the four research questions and, in the process, to contribute to the scope, scale, access, and impact of all higher education. As other individuals decide how best to engage their organizations in this agenda, we will seek to identify them and to characterize their primary interests.

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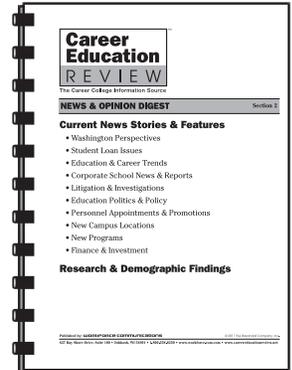
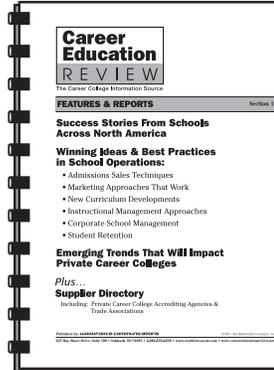
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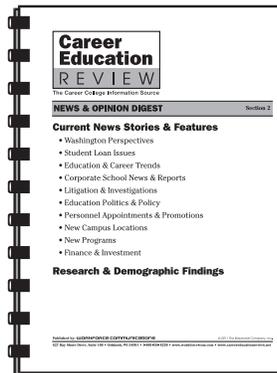
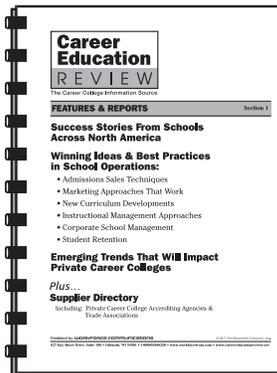
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