



The Career College Information Source

SUPPLIER DIRECTORY

February 2013

INNOVATIONS, SOLUTIONS & ANSWERS

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Placement Verification: Considerations and Best Practices



Placement Verification: Considerations and Best Practices

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With the regulatory environment that is currently surrounding career colleges, it is more important than ever for schools to ensure the placement data that they report is accurate. Enforcements related to inaccurate placement reports have resulted in significant financial and public relations damage and based on our discussions with various accrediting bodies, it is clear they are increasing their focus on placement rates.

A placement verification program can provide schools with confidence in the placement data they report while also demonstrating intentions to comply.

What Are Your School's Placement Requirements?

The first step in the development of a placement verification program is determining what requirements your school must comply with. To identify these requirements, look at the applicable federal and state regulations as well as the requirements of your accrediting body(s).

Some questions to consider include:

- What form of verification is acceptable? We've seen verifications completed via the following methods:
 - Phone
 - Fax
 - E-mail
 - Physical mail
 - Data verification through a third-party provider
- Does your accrediting body require a signed form or document to accompany each verification record?
- How many days must the graduate work before the placement is considered valid?
- Must the graduate receive payment for their work for the placement to be considered valid?
- Is a verification from the graduate acceptable or must the verification come from the employer?

Data Management

The next step in the verification process is getting the data from your career services team to the party that will be responsible for completing the verifications. Data Management is critical to the success of a placement verification program. Based on our experience with data hygiene, we believe approximately 20 percent of phone numbers are disconnected and reassigned every

year. This means your team should make every effort to verify the placement as soon as possible once you believe the graduate has worked the required amount of days.

To position the verification program for success, Career Services employees should be trained to capture

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and enter the following information into your school's student management system:

- Graduate's job title, description, and responsibilities
- Graduate contact information
 - Phone number(s)
 - E-mail address
 - Mailing address
- Employer Name
- Employer contact information

Not only is the accuracy of this data critical to complete the verification, but it also allows the school to utilize data services to contact graduates and/or employers at a later date.

Tips for a Successful Verification Program

Once the verification team is receiving the placement data, it's time for the verification process to begin. Below are a few suggestions based on the tactics we've seen lead to success in the past.

- Utilize a party independent from career services to verify every placement or a sampling of your placements. This could be an internal audit department or a third-party verification company. If you choose to only verify a sample of your placement data, you should ensure the sample includes records from each program and campus.
- Communicate the verification plan to your employers and graduates prior to launching the program. If employers and graduates are expecting the communication from your verification team, they are more likely to provide the necessary information to complete the verification.

- If your accreditation body will accept verifications from a graduate, we recommend attempting to complete the verification with the graduate before the employer. There are many issues that can arise when attempting to verify through the employer. The employer relationship can be jeopardized through too many contacts and verifying with the graduate will allow your school to avoid contacting the employer. Also, employers often require the school to provide additional information to complete the verification such as the graduate's Social Security Number or the graduate's written permission for the employer to complete the verification. Verifying through the graduate will help your school avoid some of these hurdles.
- Because you will not always be able to complete the verification through the graduate, your school should have graduates complete the written release form as part of their graduation paperwork.

Discrepancy Resolution

If your company utilizes a party independent from career services to verify placements, discrepancies will arise between what the career services team reported and what the verifying party discovers. When this occurs, a discrepancy resolution process should be utilized to resolve the issue. We recommend providing the campus with an opportunity to respond as to why they listed the graduate as placed. The campus may end up providing better contact information for the verification to be completed, they may have additional information regarding the graduate's job responsibilities, or they may agree that the placement is incorrect. The information received from the campus should be utilized to identify and correct any issues. If the campus provides clarification or supplemental information regarding the job responsibilities, this information must still be verified with the graduate or the employer.

Recordkeeping

A verification program is pointless if your school does not maintain the records to substantiate its efforts. To ensure your placement data will hold up during an audit from a regulatory body, you should ensure that your school maintains the necessary records to support your placements as well as the verifications. These records can include recordings of verification calls and copies of e-mails or faxes.

Improvement Over Time

If you're performing verification of your school's placement records, you will inevitably identify areas that can be improved. Maybe it's a campus that isn't able to verify the same percentage of records as the other campuses? What tactics are the other campuses utilizing that this campus could learn from?

Lessons learned from the auditing program should be used to bolster the training materials for your career services team and to adjust your school's placement policies and procedures as necessary.

Most importantly, when compliance issues are identified, the issue must be remediated and an enforcement mechanism should be enacted against the employee(s) responsible for the noncompliant issue. This could be a verbal or written warning, coaching or retraining, or suspension or termination.



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CompliancePoint, a PossibleNOW company, is headquartered in suburban Atlanta, Georgia. The Direct Marketing Compliance practice group of CompliancePoint offers a suite of consulting services that enable private sector colleges and universities to establish a defensible position and comply with Title IV and Program Integrity Rules as well as local, national and international consumer privacy preference regulations. CompliancePoint services include Admissions Enrollment Verification and Employment Placement Verification audits, written guidelines development, call center and vendor certification programs, ongoing monitoring and enforcement programs, and training program design and delivery. Members of the CompliancePoint consulting team hold the Certified Information Privacy Professional (CIPP) designation award by the International Association of Privacy Professionals, the world's largest association of privacy professionals.

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