

University Webpage Facilitates HEOA Disclosures

The 2008 Higher Education Opportunity Act (the “HEOA”) was discussed in a previous edition of LegalWatch (see Vol. 6-08, pp. 1-6). Among the provisions in this massive bill are notification, disclosure, and reporting requirements for colleges and universities. These requirements impose new and expanded duties on the part of higher education institutions to notify present and prospective students/parents, employees, government officials, and/or the public about institutional data, operations, and policies. A number of institutional areas are implicated by these requirements, including financial aid, athletics, campus safety and security, tuition and fees, alumni employment, student discipline, textbook policy, student body diversity, graduation and completion, etc. Obviously, the involvement of many campus offices is necessary to insure that all the HEOA disclosure requirements are met.

The HEOA specifies methods by which this information is to be provided to the intended recipients. In some instances, the information is required to be posted on an institution’s website, while in other instances the information may be posted on the website but specified individuals must be notified directly about its availability there. Some types of information must be actually distributed or delivered to the intended audience. The individuals to whom disclosure must be made include some or all of the groups mentioned above, depending on the category of information involved.

The University has implemented and is carrying out these statutory requirements. Following the recommendation of several higher education professional organizations, the University has also developed a single web page with links to all the HEOA disclosure items. This page may be accessed by clicking on the “Prospective Students,” “Current Students,” or “Faculty and Staff” buttons on the University’s main web page and then clicking the “Your Right to Know” entry on the drop-down menu in each instance. That will take the user to an “HEOA Welcome” page on which links to the HEOA information may be found. This approach, which has been adopted by many institutions, provides a convenient entrance point for all the HEOA information. Direct delivery is also being used for those HEOA categories of information that must be actually provided to designated recipients.

University offices that are responsible for the “final destination” pages, containing the information about the University’s policies, operations, etc. should monitor their pages to insure that the information is current and accurate.