Financial Aid

#7 Plan cycle - 7
Plan cycle 2020/2021
7/1/20 - 6/30/21
Introduction

The purpose of the Office of Financial Aid is to administer programs that provide quality financial assistance services to the students and their families of McNeese State University in accordance with federal and state regulations in a fair, equitable and timely manner.

The Office of Financial Aid provides students with federal and state financial assistance opportunities to assist with funding their education and with financial literacy to become more educated about the programs that are available through this office.

To assist our distance education students, this office provides all information and forms on our website and accepts documents by fax, mail, or email. In addition, our students communicate daily by email to ask questions, seek guidance, and/or submit any necessary documents.
Performance Objective 1  To provide financial assistance opportunities and services to students in a knowledgeable, efficient, and satisfactory manner. In addition, to reach out and inform the community (public and on-campus) about financial aid information, opportunities, and applications.

1 Assessment and Benchmark

Benchmark: Score at least 3.50 (met expectations) or higher (on a 4.00 scale) on all items listed on the Financial Aid Workshop Survey.

1.1 Data

<table>
<thead>
<tr>
<th>Academic Year</th>
<th>Response rate</th>
<th># of items with a score higher than 3.00</th>
</tr>
</thead>
<tbody>
<tr>
<td>2013-2014</td>
<td>20/32</td>
<td>6/6</td>
</tr>
<tr>
<td>2014-2015</td>
<td>10/25</td>
<td>6/6</td>
</tr>
<tr>
<td>2015-2016</td>
<td>8/27</td>
<td>6/6</td>
</tr>
<tr>
<td>2016-2017</td>
<td>8/32</td>
<td>6/6</td>
</tr>
<tr>
<td>2017-2018</td>
<td>17/29</td>
<td>6/6</td>
</tr>
<tr>
<td>2018-2019</td>
<td>20/24</td>
<td>6/6</td>
</tr>
<tr>
<td>2019-2020</td>
<td>7/23</td>
<td>6/6</td>
</tr>
<tr>
<td>2020-2021</td>
<td>N/A</td>
<td>N/A</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Statement</th>
<th>Academic Year Ending</th>
</tr>
</thead>
<tbody>
<tr>
<td>The financial aid information was presented to the seniors and/or parents</td>
<td>2017</td>
</tr>
<tr>
<td>in a clear and concise manner.</td>
<td>3.75</td>
</tr>
<tr>
<td>The PowerPoint presentation content was understandable.</td>
<td>3.75</td>
</tr>
<tr>
<td>The presenter held the audience's interest throughout the presentation.</td>
<td>3.75</td>
</tr>
<tr>
<td>The presenter was available for additional help after the presentation was</td>
<td>3.88</td>
</tr>
<tr>
<td>over.</td>
<td></td>
</tr>
<tr>
<td>The overall presentation was done in a timely manner.</td>
<td>4.00</td>
</tr>
<tr>
<td>I will invite McNeese State University back to speak to the seniors and/or parents about financial aid next year.</td>
<td>4.00</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Statement</th>
<th>Academic Year Ending</th>
</tr>
</thead>
<tbody>
<tr>
<td>The financial aid information was presented to the seniors and/or parents</td>
<td>2020</td>
</tr>
<tr>
<td>in a clear and concise manner.</td>
<td>3.43</td>
</tr>
<tr>
<td>The PowerPoint presentation content was understandable.</td>
<td>3.57</td>
</tr>
<tr>
<td>The presenter held the audience's interest throughout the presentation.</td>
<td>3.43</td>
</tr>
<tr>
<td>The presenter was available for additional help</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>
1.1.1 Analysis of Data and Plan for Continuous Improvement

2017-2018:
- Continue providing financial aid workshops to the seven-parish area high schools when staff and funding permits.
- Have each student sign in to compare the data to see how many students attend McNeese for their first semester out of high school. We will create a new McNeese sign in sheet to use at each school visit to collect the appropriate data for this information to be included in Radius for future communication with each student.
- Work with staff to ensure they are prepared for their presentation. This past year, we have several new employees presenting, so this could have resulted in some of our evaluation scores being a little lower than last year.
- Work with Institutional Research and Effectiveness to convert financial aid workshop web survey for high school counselors to Class Climate.

2018-2019:
- Continue providing financial aid workshops to the seven-parish area high schools when staff and funding permits.
- We required all participants to complete an Admission inquiry card. Will need to work with Admissions to determine how many of these students that attended these workshops actually enrolled for Fall 2019 (based on the FAFSA year).
- Work with staff to ensure they are prepared for their presentation; this will help to increase scores. We had more experienced staff members conducting the workshops, which is why scores were better this year than last year.
- Work with Institutional Research and Effectiveness to convert financial aid workshop web survey for high school counselors to Class Climate.
- After reviewing 2018-2019, we will be increasing our benchmark from 3.0 to 3.5 based on all results being 3.6 with the exception of one.

2019-2020:
- A few did not meet our new benchmark of 3.5, but our response was very low and we had many new staff members that were presenters for their first time. Will continue to work toward training staff members to be better prepared when conducting their yearly training.
- We will be working to prepare a video training for our financial aid workshops for Fall 2020 due to the COVID-19 pandemic and not sure that area high schools would welcome us to conduct the workshops. We will plan to offer the presentation to all high school counselors and inquire about adding it to the McNeese Financial Aid website for anyone to view at any time. We will have to work with the keepers of the website data to monitor how many view the presentation for historical purposes.
- We accomplished working with Institutional Research and Effectiveness to convert financial aid workshop web survey for high school counselors to Class Climate. We were definitely disappointed with our response rate through the Class Climate survey. I am not sure if the counselors did not find it as easy as Survey Monkey or not. We will plan to continue to use Class Climate with the hopes that our response number will increase for the next year. Due to COVID-19, we might not be...
offering the presentation in person, so we might not have anyone to survey about the video presentation.

2020-2021: Due to COVID-19, we were not able to offer these presentations in person nor were we able to create the video presentations due to personnel shortages. As of this time, we will no longer plan to offer the financial aid presentations due to personnel shortages, so we will guide all requests to Louisiana Office of Student Financial Assistance (LOSFA) for their team to assist schools since they are already offer and provide them statewide. This performance objective will be removed for the future since we will only be providing table browse concept between classes in the campus quad and will not be able to measure the visits through a survey.

Performance Objective 2  Receive zero exceptions on all audits.

1 Assessment and Benchmark

Benchmark: Zero exceptions on state legislative audit conducted every even year.

1.1 Data

<table>
<thead>
<tr>
<th>Semester</th>
<th># of exceptions on state legislative audit</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fall 2013</td>
<td>0</td>
</tr>
<tr>
<td>Summer 2014</td>
<td>0</td>
</tr>
<tr>
<td>Summer 2016</td>
<td>0</td>
</tr>
<tr>
<td>Summer 2018</td>
<td>0</td>
</tr>
<tr>
<td>Summer 2020</td>
<td>0</td>
</tr>
<tr>
<td>Summer 2021</td>
<td>0</td>
</tr>
</tbody>
</table>

1.1.1 Analysis of Data and Plan for Continuous Improvement

2017-2018:
- The state legislative single audit was conducted in summer 2016 with no findings, meeting the performance indicator.
- Consistently monitor reporting and data collection requirements and updated policies and procedures to ensure compliance with stated requirements. Continue to monitor current regulations for changes in all federal programs as well as state grant programs.
- To ensure efficiency, evaluate manual processes and work toward automating those processes as appropriate.

2018-2019:
- The state legislative single audit was conducted in summer 2018 with no findings, meeting the performance indicator.
- Consistently monitor reporting and data collection requirements and updated policies and procedures to ensure compliance with stated requirements. Continue to monitor current regulations for changes in all federal programs as well as state grant programs.
- To ensure efficiency, evaluate manual processes and work toward automating those processes as appropriate.

2019-2020:
- The state legislative single audit was conducted in summer 2020 with no findings, meeting the performance indicator.
- Consistently monitor reporting and data collection requirements and updated policies and procedures to ensure compliance with stated requirements. Continue to monitor current regulations for changes in all federal programs as well as state grant programs.
• To ensure efficiency, evaluate manual processes and work toward automating those processes as appropriate.

2020-2021:
• The state legislative audit was conducted in spring 2021 with no findings for Title IV aid programs, meeting the performance indicator. The university did have some policy findings from the IT area pertaining to security that was reviewed during this audit, but it was not finding within the Financial Aid Office.
• Consistently monitor reporting and data collection requirements and updated policies and procedures to ensure compliance with stated requirements. Continue to monitor current regulations for changes in all federal programs as well as state grant programs.
• To ensure efficiency, evaluate manual processes and work toward automating those processes as appropriate.

2 Assessment and Benchmark

Benchmark: Zero exceptions on any random Louisiana Office of Student Financial Assistance (LOSFA) program review.

2.1 Data

<table>
<thead>
<tr>
<th>Semester</th>
<th># of exceptions on any LOFSA review</th>
</tr>
</thead>
<tbody>
<tr>
<td>Spring 2013</td>
<td>0</td>
</tr>
<tr>
<td>Spring 2017</td>
<td>0</td>
</tr>
</tbody>
</table>

2018-2019: A LOSFA program review was not conducted in the 2018-2019 academic year.

2019-2020: A LOSFA program review was not conducted in the 2019-2020 academic year.

2020-2021: A LOSFA program review was not conducted in the 2020-2021 academic year, but we do have one scheduled for October 2021 to audit the 2019-2020 and 2020-2021 academic year for some specific programs, two being administered through this office, GO Grant and Chafee.

2.1.1 Analysis of Data and Plan for Continuous Improvement

2017-2018:
• The Louisiana Office of Student Financial Assistance (LOSFA) program review was conducted in April 2017 to monitor the GO grant program. It resulted in no findings, meeting the performance indicator.
• Consistently monitor reporting and data collection requirements and updated policies and procedures to ensure compliance with stated requirements. Continue to monitor current regulations for changes in all federal programs as well as state grant programs.
• To ensure efficiency, evaluate manual processes and work toward automating those processes as appropriate.

2018-2019:
As stated for 2017-2018, this will continue to be monitored on a yearly basis.

2019-2020:
As stated for 2018-2019, this will continue to be monitored on a yearly basis.

2020-2021:
As stated for 2019-2020 year, this will continue to be monitored on a yearly basis.
3 Assessment and Benchmark

Benchmark: Zero exceptions on US Department of Education program review.

3.1 Data

2017-2018:
The last US Department of Education program review was conducted in 1996 and resulted in no findings.

2018-2019:
A US Department of Education program review was not conducted in the 2018-2019 academic year.

2019-2020:
A US Department of Education program review was not conducted in the 2019-2020 academic year.

2020-2021:
A US Department of Education program review was not conducted in the 2020-2021 academic year.

3.1.1 Analysis of Data and Plan for Continuous Improvement

2017-2018:
• Consistently monitor reporting and data collection requirements and updated policies and procedures to ensure compliance with stated requirements. Continue to monitor current regulations for changes in all federal programs as well as state grant programs.
• To ensure efficiency, evaluate manual processes and work toward automating those processes as appropriate.

2018-2019:
As stated for 2017-2018, this will continue to be monitored on a yearly basis.

2019-2020:
As stated for 2018-2019, this will continue to be monitored on a yearly basis.

2020-2021:
As stated for 2019-2020 year, this will continue to be monitored on a yearly basis.

4 Assessment and Benchmark

Benchmark: Zero exceptions on any additional audits or program reviews conducted internally or externally throughout the year.

4.1 Data

<table>
<thead>
<tr>
<th>Fiscal Year</th>
<th># of exceptions on any additional audits or program reviews conducted internally or externally</th>
</tr>
</thead>
<tbody>
<tr>
<td>2013</td>
<td>0</td>
</tr>
<tr>
<td>2014</td>
<td>0</td>
</tr>
<tr>
<td>2015</td>
<td>0</td>
</tr>
<tr>
<td>2016</td>
<td>0</td>
</tr>
<tr>
<td>2017</td>
<td>0</td>
</tr>
<tr>
<td>2018</td>
<td>0</td>
</tr>
<tr>
<td>2019</td>
<td>0</td>
</tr>
</tbody>
</table>
2018-2019: There were no additional audits or program reviews conducted internally or externally in the 2018-2019 academic year.

2019-2020: There were no additional audits or program reviews conducted internally or externally in the 2019-2020 academic year.

2020-2021: There were no additional audits or program reviews conducted internally or externally in the 2020-2021 academic year.

4.1.1 Analysis of Data and Plan for Continuous Improvement

2017-2018: There were no exceptions reported by internal or external auditors during the prior fiscal year, meeting the performance indicator.
Consistently monitor reporting and data collection requirements and updated policies and procedures to ensure compliance with stated requirements. Continue to monitor current regulations for changes in all federal programs as well as state grant programs.
To ensure efficiency, evaluate manual processes and work toward automating those processes as appropriate.

2018-2019: As stated for 2017-2018, this will continue to be monitored on a yearly basis.

2019-2020: As stated for 2018-2019, this will continue to be monitored on a yearly basis.

2020-2021: As stated for 2019-2020, this will continue to be monitored on a yearly basis.

Performance Objective 3 To provide information and guidance to help student borrowers understand how to manage their debt and repay loans. (SACSCOC 12.6)

1 Assessment and Benchmark

Benchmark: Require all first time federal student loan borrowers to complete Entrance Counseling.

1.1 Data

2017-2018: All first time federal student loan borrowers must complete Entrance Counseling at the US Department of Education (USDE) website, www.studentloans.gov, prior to the Financial Aid Office certifying their federal student loan. We record the requirement that the student needs to fulfill in Banner and send students an email guiding them to the USDE website to complete the process if they are interested in pursuing the federal loan. We retrieve from the USDE daily all who have completed the process for us to continue with the certifying of their federal student loan(s).

The number count of students that complete this each year has not been determined. A new program will have to be created for this.

2018-2019: This is an on-going project with the hope of being able to identify the number of students that complete this each academic year.
2019-2020:
Below is a chart for us to begin keeping track of our number of students that were first-time federal student loan borrowers.

2020-2021:

<table>
<thead>
<tr>
<th>Academic Year</th>
<th>Number of Entrance Counseling Completed</th>
</tr>
</thead>
<tbody>
<tr>
<td>2018-2019</td>
<td>1,524</td>
</tr>
<tr>
<td>2019-2020</td>
<td>1,423</td>
</tr>
<tr>
<td>2020-2021</td>
<td>1,168</td>
</tr>
</tbody>
</table>

1.1.1 Analysis of Data and Plan for Continuous Improvement

2017-2018:
The University has had prior conversations about making this mandatory on a yearly basis for each student. The current procedures is once a student has completed their Entrance Counseling at McNeese, then they do not have to repeat it again. To implement a change requiring each student to complete counseling on a yearly basis will be a huge change for the students, and we would have to determine the appropriate time to implement a change like this.

2018-2019:
At this time, we will continue to only have the students complete the Entrance Counseling for the initial loan as they join the University.

2019-2020:
As stated for 2018-2019, this will continue to be monitored on a yearly basis to determine if we have a need to require our students to complete a yearly Entrance Counseling.

2020-2021:
For the 2019-2020 academic year, USDE had planned to implement a new yearly counseling format for every student, but it was delayed due to COVID-19. This will continue to be monitored on a yearly basis to determine if we have a need to require our students to complete a yearly Entrance Counseling.

2 Assessment and Benchmark

Benchmark: Require Exit Counseling notification for any federal student loan borrower that ceases to be enrolled at least half-time each semester at any time during the semester.

2.1 Data

All federal student loan borrowers are monitored each semester to determine if they are enrolled at least half-time (six or more hours). Any student that is not enrolled at least half-time will be notified that they must complete Exit Counseling at the USDE website, www.studentloans.gov website. This process is run each semester and emails the students that the requirement must be fulfilled at the point that they are either not enrolled at the beginning of the semester and/or at the point that they cease to be enrolled at least half-time during the semester. Our process is run on a nightly basis.

Per federal regulations, we must notify the students to complete the Exit Counseling, but we are not required to monitor the number that actually complete the process at the USDE website.

<table>
<thead>
<tr>
<th>Academic Year</th>
<th># of potential graduates and federal student loan borrowers notified to complete Exit Counseling</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Fall</td>
</tr>
<tr>
<td>2017-2018</td>
<td>323</td>
</tr>
</tbody>
</table>
2.1.1 Analysis of Data and Plan for Continuous Improvement

2017-2018: We will continue to email our students that need to complete the Exit Counseling, guiding them to the USDE website. In an effort to help provide our students with additional guidance during their grace period, the University has implemented some additional procedures (see 3.1 data below).

2018-2019: This section includes our statistical data collected for all students that cease to be enrolled at least half-time status and each of these students are then referred to our Grace Counseling Partnership listed in 3.1. If we were ever to have a Cohort Default Rate (CDR) rate of 25%, then we would be recommending to the administration that they implement Default Management steps.

2019-2020: As stated for 2018-2019, this will continue to be monitored on a yearly basis.

2020-2021: As stated for 2019-2020, this will continue to be monitored on a yearly basis.

3 Assessment and Benchmark

Benchmark: Grace counseling is provided to all federal student loan borrowers when they first leave the University or cease to be enrolled at least half-time (six or more hours). All federal loan borrowers have a six-month grace period prior to their loan repayment starting.

3.1 Data

The University has partnered with a third-party servicer to notify each of our federal student loan borrowers that are no longer enrolled at the University or enrolled less than half-time status. The third-party servicer will provide the students with repayment options, deferment information, cancellation options, a location to call 24 hours to ask any questions and seek guidance, etc. This is the University's way of ensuring that our student loan borrowers can get on a path to success for repaying their federal loans, which will help keep our Cohort Default Rate (CDR) as low as possible. Below is statistical information on our borrowers by academic year (July 1st through June 30th).
3.1.1 Analysis of Data and Plan for Continuous Improvement

2017-2018:
- We will continuously send and monitor our students that enter into their grace period to our third-party servicer to ensure that our students are receiving guidance and assistance to help our students get on the correct path for their appropriate repayment option.
- We will evaluate our third-party servicer on a yearly basis to ensure our partnership is working for our students and the University.

2018-2019:
We will continue to refer all of our students that cease to be enrolled at least half-time status each semester for Grace Counseling.

This section includes our statistical data collected for all students that cease to be enrolled at least half-time status and were referred to our Grace Counseling Partner. This company provides details to our students on all repayment options with 24/7 accessibility to our students. If we were ever to have a Cohort Default Rate (CDR) rate of 25%, then we would be recommending to the administration that they implement Default Management steps.

2019-2020:
As stated for 2018-2019, this will continue to be monitored on a yearly basis and will continue our partnership for the Grace Counseling.

2020-2021:
Due to COVID-19, repayment options had changed to assist loan borrowers with the economy and we are not sure when that will change back. All borrowers were given a deferment until the USDE and federal government provide any changes. We will continue to be monitor on a yearly basis and will continue our partnership for the Grace Counseling.

Performance Objective 4 To monitor the default rate of student borrowers.

1 Assessment and Benchmark

Benchmark: Ensure that the University’s Cohort Default Rate (CDR) from National Student Loan Database System (NSLDS) remains below 20%.

1.1 Data

<table>
<thead>
<tr>
<th>Fiscal Year</th>
<th>CDR Percentage</th>
<th>Rate Type</th>
<th>Process Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>2010</td>
<td>12.9%</td>
<td>2 Year Official</td>
<td>8/04/2012</td>
</tr>
<tr>
<td>2010</td>
<td>17.2%</td>
<td>3 Year Official</td>
<td>7/28/2013</td>
</tr>
<tr>
<td>2011</td>
<td>10%</td>
<td>2 Year Official</td>
<td>7/27/2013</td>
</tr>
<tr>
<td>2011</td>
<td>12.9%</td>
<td>3 Year Official</td>
<td>7/26/2014</td>
</tr>
<tr>
<td>2012</td>
<td>12.1%</td>
<td>3 Year Official</td>
<td>8/08/2015</td>
</tr>
<tr>
<td>2013</td>
<td>12.4%</td>
<td>3 Year Official</td>
<td>8/06/2016</td>
</tr>
<tr>
<td>2014</td>
<td>11%</td>
<td>3 Year Official</td>
<td>8/05/2017</td>
</tr>
<tr>
<td>2015</td>
<td>9.9%</td>
<td>3 Year Official</td>
<td>8/18/2018</td>
</tr>
<tr>
<td>2016</td>
<td>13.6%</td>
<td>3 Year Official</td>
<td>8/3/2019</td>
</tr>
<tr>
<td>2017</td>
<td>12.4%</td>
<td>3 Year Official</td>
<td>8/8/2020</td>
</tr>
<tr>
<td>2018</td>
<td>8.4%</td>
<td>3 Year Draft</td>
<td>1/30/2021</td>
</tr>
</tbody>
</table>
In the past, the USDE only used a two-year CDR, but in 2009, changed it to a three-year CDR, which made CDRs increase at almost all Title IV schools. Beginning in 2012, the three-year CDR is the only one used at this time. Federal regulation requirements were altered based on the three year CDRs pertaining to when the Default Management Plan must be implemented, Title IV funding is at risk, sanctions, etc.

1.1.1 Analysis of Data and Plan for Continuous Improvement

2017-2018:
If our CDR reaches 20% or above, then the University must implement a Default Management Plan. In addition, the Financial Aid Office will seek funding from the University to partner with a company for a default management program for our students.

2018-2019:
Unfortunately, our CDR did take a steep increase after decreasing the past few years. The limited control that we have over our CDR would be through implementing a default management plan, which would require partnering with a company to do 24/7 outreach to our students that are no longer in school. We have tried many attempts and avenues in the past of reaching out to our defaulted students, but the majority of the students could not be reached during our work hours. Many schools have had success with default management either by implementing a financial management location on their campus to help their students with learning how to manage their finances and/or hiring a partner company to communicate with the students at all times and hours on the many repayment options.

2019-2020:
Fortunately, we had a small decrease in our CDR, but we will continue to monitor it on a yearly basis to determine if we need to implement a Default Management Plan. We are worried about our CDR based on COVID-19 due to the unknown for the pandemic and the economy for our previous students repaying the student loans.

2020-2021:
Our CDR decrease was due to COVID-19 and student being given deferment to not have to repay student loans at this time per the federal government. We will continue to monitor it on a yearly basis to determine if we need to implement a Default Management Plan and continue our grace counseling partnership.

Performance Objective 5 Comply with gainful employment regulations.

1 Assessment and Benchmark

Benchmark: Ensure that all Gainful Employment (GE) regulations are fulfilled for any non-degree programs, like our post-baccalaureate certificates (PBCs).

1.1 Data

2017-2018:
Due to the University providing PBCs, ensure that all GE regulations are being fulfilled. These regulations include posting all details of the programs on our website, using the required USDE templates for disclosing the information, posting all information on the University website, reporting the number of students enrolled in each program, number of completers, etc. In addition, we must provide a link to the University’s GE details on the home page of the University’s website for students to easily find.

If a new program is added by the University, it must be submitted to USDE for approval prior to providing any Title IV funding to any student. It is important for the Financial Aid Office to be informed of all new PBCs after the Board of Regents approves them and prior to the program starting.

2018-2019:
All requirements were fulfilled for reporting purposes to USDE on all PBC programs. In addition, all GE disclosures were created and added to our website in a timely manner.
All requirements were fulfilled for reporting purposes to USDE on all PBC programs. In addition, all GE disclosures were created and added to our website in a timely manner.

Gainful employment federal regulations were rescinded by McNeese in the Fall 2019, this objective will be removed for the future since we no longer have to comply with this federal regulation.

### 1.1.1 Analysis of Data and Plan for Continuous Improvement

#### 2017-2018:
- If any program has ten or more completers, then some additional regulations and reporting compliance must begin.
- To remain Title IV-eligible for our PBCs that meet the GE eligibility, continue to monitor the regulations and comply with the numerous reporting and disclosures required.

#### 2018-2019:
All disclosures and consumer information requirements were fulfilled for all PBC programs. When we are notified of new programs, then the updating of our USDE Program Participation Agreement (PPA) does happen. Programs cannot be added to our PPA until after approved by the Board of Regents and then it will typically take about three to six months for the USDE to determine their Title IV eligibility. It is extremely important for all new programs to be shared with this office in a timely manner to determine if they will be eligible for Title IV assistance.

#### 2019-2020:
As stated for 2018-2019, this will continue to be monitored on a yearly basis.

#### 2020-2021:
Gainful employment federal regulations were rescinded by McNeese in the Fall 2019, this objective will be removed for the future since we no longer have to comply with this federal regulation.