

## **Proposal regarding the Department's draft reporting requirements (668.409) and disclosure requirements (668.410) for GE programs**

The informal disclosure working group urges the Department to strengthen the language in its proposed drafts of sections 668.409 (reporting requirements) and 668.410 (disclosure requirements). The draft requirements in these two sections fall short of (1) capturing complete data, and (2) disclosing material information in a clear and meaningful manner.

### **Reporting data as well as disclosing it (668.409 and 410)**

Preliminarily, it is important to underscore that the Department can legally require institutions to report program-level aggregate data to NCES to be stored in IPEDS. See, *Ass'n of Private Sector Colleges & Univs. v. Duncan*, 2013 U.S. Dist. LEXIS 37355 \*31 (D.D.C. Mar. 19, 2013). Further, the rationale behind why the Department should require institutions to *report* in addition to *disclose* key data about GE programs is well-founded.

Reporting, in addition to disclosing data, would better ensure that students and families have timely information to inform decisions about whether a GE program matches their desired outcomes, i.e. on-time completion, jobs and earnings. Reporting the data also allows policymakers access to information about GE programs that can help them examine outcomes other than those used to calculate program eligibility metrics.

Students would have a much easier time finding the information if, in addition to requiring schools to disclose it, the Department required the data reported and collected in a central location.<sup>1</sup> The Department would be able to publish the information in its consumer materials, such as College Navigator and College Scorecards. This means that institutions must be required to report the information in question to the National Center for Education Statistics (NCES) on a regular basis in a format that will allow consumers to compare colleges to one another. Doing so would require institutions to follow standard formats and definitions.

Presenting certain consumer information in a consistent manner and in one location is not a novel concept. Take for instance the 1990 Student Right-to-Know Act ("Student Right-to-Know and Campus Security Act" (P.L. 101-542), Title I, Section 103). Congress established the Act to clearly define the six-year graduation rate that is often used today to compare institutions. The Act made graduation rate calculations

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<sup>1</sup> The current gainful employment program disclosures on college websites are frequently very difficult to find and understand. See Appendix F of TICAS' comments on topics to be included in the Department of Education's negotiated rulemaking (June 2013): [http://www.ticas.org/files/pub/TICAS\\_June\\_2013\\_neg\\_reg\\_comments.pdf](http://www.ticas.org/files/pub/TICAS_June_2013_neg_reg_comments.pdf).

consistent across institutions. At least one study has found that giving parents of high-school-age children consistent, comparable information about college graduation rates increases the likelihood of their choosing colleges with higher rates. Parents in the study with less income, less education, and less knowledge of the college application process were particularly responsive to graduation rate information.<sup>2</sup>

Furthermore, without a reporting requirement in addition to a disclosure requirement, schools may not comply with the disclosure requirement at all. In 2011 the Education Sector and the American Enterprise Institute conducted a study of 300 institutions that found that the vast majority of the institutions did not disclose their graduation rates for Pell Grant recipients, one of the disclosure requirements in the 2008 Higher Education Opportunity Act.<sup>3</sup> This lack of compliance hampers the ability of consumers and policymakers to understand which colleges not only enroll substantial numbers of low-income Pell Grant recipients, but also graduate them. Simply put, by requiring institutions to report the data in addition to disclose the data, the Department would be in a much better position to enforce the reporting and disclosure requirements.

**Reported and Disclosed Program-level Data must include all students in GE programs (668.409 and 668.410)**

Excluding the reporting requirements that are in place for purposes of calculating the debt-to-income metric, any program-level reporting and disclosure requirement must include not only “students” as defined in 34 CFR 600.2 who receive title IV, HEA funds, but rather *all students* enrolled in a GE program during an award year regardless of how they pay for tuition. Data pertaining to all students enrolled in a GE program will provide a complete picture of the program, meaningful to a broader spectrum of students who may or may not need to take out federal student aid to enroll in the program. Further, if all students are included in reporting and disclosures then GE programs with low numbers of federal student aid borrowers will have sufficient information to report. Finally, the Department regularly and legally collects data on students who do not receive Title IV assistance from institutions at the aggregate level through IPEDS surveys. *See, Ass'n of Private Sector Colleges & Univs.*, LEXIS 37355 \*27.

**The Department’s disclosure regulation should require certain material data to be included in a preliminary disclosure template and allow the Secretary to develop a final disclosure template through consumer testing (668.410)**

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<sup>2</sup> Andrew P. Kelly and Mark Schneider, *Filling in the Blanks: How Information Can Affect Choice in Higher Education* (Washington, DC: American Enterprise Institute for Public Policy Research, 2011).

<sup>3</sup> Kevin Cary and Andrew P. Kelly, *The Truth Behind Higher Education Disclosure Laws*, (Washington, DC: American Enterprise Institute for Public Policy Research, 2011).

Under the current regulations in effect today, the Department has the authority to issue a disclosure template (668.6(b)(2)(iv): The institution must “use the disclosure form issued by the secretary to provide the information in paragraph (b)(1), and other information, when that form is available.”) However the Department has not finalized such a template. In late 2012, the Department issued an Electronic Announcement #42 on Disclosures for Gainful Employment Programs in which it stated that the Department was waiting for the court to rule on the Department’s request to reinstate the GE reporting requirements. The Court ultimately denied the Department’s request, but this ruling did not negate the Department’s ability to issue a disclosure template. The Department advised institutions that “[u]ntil the template is available, institutions must make the GE program disclosure using an institutionally-determined format” that includes all of the data required to be disclosed under 668.6(b)(1) and calculate the median loan debt for each program themselves. See, Gainful Employment Electronic Announcement #42 at <http://www.ifap.ed.gov/eannouncements/112312GEAnnounce42DisclosureofGEPrograms1112.html>.

The lack of a disclosure template, coupled with a lack of more specific language about where and how disclosures should be made to consumers, has led to a situation where schools hide or obscure the disclosures, place them deep within their web sites and/or make them difficult to understand.

Accordingly, based on the current regulations (668.6) we urge the Department to immediately devise and publish a preliminary disclosure template for comment and require covered institutions to use it. Gainful employment programs must continue to use the Preliminary Disclosure Template until July 1, 2015 when they must switch to using a final Disclosure Template. The final disclosure template should be developed through the process described below.

The final disclosure template must – not may -- include certain of the information listed under the current regulation in 668.6(b)(1), including SOC codes related to the GE program, tuition and fees, books, room and board, placement rates for completers, and median loan debt. The on-time graduation rate (668.6(b)(1)(ii)), as calculated under the current regulations, is potentially misleading and the draft regulations address this concern with a revised definition (668.410(f)); the draft completion rate calculation must be included in the template.

In addition, the Department must include the relevant educational prerequisites for professional licensure associated with the GE program as well information about its programmatic accreditation (or lack thereof). The language for draft paragraph 410(a)(9) should therefore be expanded to include not only “educational prerequisites for professional licensure in the State” but also “other requirements that are generally needed to be employed in the fields for which the training is provided.” Eligible institutions are already required to not misrepresent this information pursuant to

668.74(f). This additional language is intended to capture the link between programmatic accreditation and employment. Often a state may not require certification but employers within that state do; and without a degree or certificate from a programmatically accredited program, a person is unable to obtain the certification and/or the job that was represented by the school.

The above key pieces of information are material to students' enrollment decisions. Furthermore, the HEA requires this information to be made available. See, <http://nces.ed.gov/pubs2010/2010831rev.pdf> at p. B-2 and B-3.

In cases where the Secretary issues a notice of determination that a GE program could become ineligible based on its final eligibility metric (assuming for the moment the metric is only debt-to-income) for the subsequent award year, pursuant to 668.407, then the institution must include on the disclosure template for the specific program at the top of the template as a boxed warning, in a bolded font size larger than any other print on the page, the following:

**STUDENT WARNING: On average, students who completed this program did not earn enough money to be able to make the regular student loan payments needed to pay off their loans over 10 years. The program must show a lower student debt compared to how much graduates earn or the program will no longer be able to participate in the federal student aid program. This means a student enrolled in this program may not be able to receive federal student aid to pay for the cost of attending this program after [insert year]. The school provides some options for current and prospective students enrolled in this program: [insert options allowed under 407(c)(1)(ii)].**

The above "student warning" satisfies Judge Contreras' concerns articulated in footnote 7 on \*32. Therein, the court stated:

Because the court vacates and remands the entire regulation, it need not address the Association's argument that the debt measures violate the First Amendment by requiring that programs that fail the debt measure test in two out of three years must disclose that "a student who enrolls or continues to enroll in the program should expect to have difficulty repaying his or her student loans." Debt Measure Rule, 76 Fed. Reg at 34,432. The government may require the commercial disclosure of "purely factual and uncontroversial information" as long as there is a rational justification for the means of disclosure and it is intended to prevent consumer confusion, see *Zauderer v. Office of Disciplinary Counsel*, 471 U.S. 626, 651 (1985),

but the court doubts that the statement that every student in a program “should expect to have difficulty repaying his or her student loans” is a purely factual one.

The Secretary’s position that it is deceptive to advertise a program and invite students to enroll in that program when the school knows that the program may not be eligible to participate in the federal student loan program under the gainful employment metric, and the school does not otherwise disclose that fact to students, is reasonable enough to support a requirement that information regarding the program’s status under the gainful employment metric be disclosed. *See, Zauderer v. Office of Disciplinary Counsel of Supreme Court*, 471 U.S. 626, 649-653 (U.S. 1985)(finding the position that it is deceptive to employ advertising that refers to contingent-fee arrangements without mentioning the client's liability for costs is reasonable enough to support a requirement that information regarding the client's liability for costs be disclosed).

Further, if an institution does not disclose a warning about a GE program that may lose eligibility and its implications to students, the very absence of the warning has a tendency to mislead as it gives the appearance that the failing GE program is just like every other GE program at the school, *i.e.* eligible to participate in the federal student aid program, when that may not be the case. *See Id.* at 652 (noting that “When the possibility of deception is as self-evident as it is in this case, we need not require the State to “conduct a survey of the . . . public before it [may] determine that the [advertisement] had a tendency to mislead”). So long as the Secretary’s disclosures are intended to combat the problem of inherently misleading commercial advertisements about the eligibility of programs and they entail only an accurate statement of the program’s legal status and the consequences of the status, the disclosures will stand. *Milavetz, Gallop & Milavetz, P.A. v. United States*, 559 U.S. 229, 230-231 (U.S. 2010).

### **The Secretary should conduct consumer testing to determine a final disclosure template and method of disclosure**

The disclosure regulation should also allow the Secretary to add additional disclosures to the final disclosure template once the Department conducts consumer testing and receives public comment on the template. This will allow the Secretary to gather consumer feedback and develop a meaningful disclosure template that informs students and arms them with the information they need to make informed decisions about GE programs.

Other federal agencies have utilized different forms of consumer testing to develop disclosure templates. For example, the Federal Reserve conducted consumer testing of mortgage broker disclosures in 2008 (<http://www.federalreserve.gov/newsevents/press/bcreg/20080714regzconstest.pdf>) and, more recently, the Consumer Financial Protection Bureau solicited consumer and lender input regarding new mortgage disclosures

(<http://www.consumerfinance.gov/knowbeforeyouowe/>). The Department could specify in the regulations how the consumer testing should be administered, similar to language included in the Smarter Borrowing Act (S. 546), which is a bill introduced in March 2013 to amend entrance counseling and exit counseling for borrowers under the HEA. We have provided some suggested language based off of the Smarter Borrowing act:

668.409

(b)The Secretary will determine the format of the disclosure and whether additional information shall be included in the template through the following procedure:

(1)Not later than 3 months after this rule is published in the federal register, the Secretary shall establish a process for consumer testing the disclosure template.

(2)The Secretary shall ensure that the consumer testing described in this section lasts not longer than 6 months after the process for consumer testing has been established under subsection (b)(1).

(c) Use of Consumer Testing Results- The Secretary shall use the results of the consumer testing in the development of the disclosure template. In a notice published in the Federal Register the Secretary will seek public comment on the Disclosure Template.

(d) Final Disclosure Template- Not later than July 1, 2015 the Secretary shall publish the new disclosure template in the Federal Register.

(e) Preliminary Disclosure Template- On the same day the Secretary publishes this rule in the Federal Register, the Secretary will publish a preliminary disclosure template. Gainful employment programs must use the Preliminary Disclosure Template not later than 30 days after it is published in the federal register. Gainful employment programs must continue to use the Preliminary Disclosure Template until July 1, 2015. Gainful employment programs must switch from using the Preliminary Disclosure Template to the Disclosure Template not later than August 1, 2015.

**The Disclosure Regulations should require institutions to clearly and conspicuously disclose the disclosure template (668.410)**

The Department's draft language in 410 specifies that the institutions must provide only a "prominent and direct link (one click) to the disclosure template for that program." The language "prominent" was used in the current regulations (668.6) and largely ignored by institutions.<sup>4</sup> We have observed institutions that lump all gainful employment program disclosures into a single PDF that is four to five clicks deep into the school's web site. The Department has already advised schools that the current regulations do not allow them to lump all of the GE program disclosures into a single central location, but it is not specified in the regulations. See, D-Q17 and D-A17 on Gainful Employment – Frequently Asked Questions at [www.ifap.ed.gov/gainfulemploymentinfo/2011GEFAQ.html](http://www.ifap.ed.gov/gainfulemploymentinfo/2011GEFAQ.html). Because of these abuses, we recommend requiring the disclosure template to appear clearly and conspicuously on the web pages that discuss the GE programs rather than allowing schools to link to the information.

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<sup>4</sup> Schools haphazardly apply the current regulations and hide disclosures in long lists of links with meaningless names. The links are often not from the page that describes the degree program. For example, in order to find the required disclosures under the current regulation, at one school's site: nothing on the program home pages; nothing on the career services page; along the top there is a list of links and one is called "Why [school name]?" If you hover the mouse over the button, you get a dropdown that includes "useful links" and "disclosures"; and if you click on the button, you do not get these links; if you click on "useful links" you get a long list of information and halfway down you get "employment placement"; and when you click on it you get aggregated rates in a chart and there is no explanation how the school arrived at the numbers.

Similarly, the draft language states that all promotional materials about the GE program made available to prospective students must include the information on the disclosure template in a “prominent manner” but then states that the school may use a URL or link if space on the promotional material precludes the full disclosure of the information. This exception may swallow the rule since the invitations, flyers, billboards and ads on radio, TV, and the Internet impose “space and airtime constraints.” That said, the URL name must be named and placed conspicuously. The Department’s choice for a URL name, “Important Federal Student Aid Information You Need to Know,” sounds like just another government disclosure rather than information about jobs, salaries and student loan debt. The name should be revised to reflect its relevance and importance. Recommended language is described below.

### **Disclosures on Web sites and in Promotional Materials**

The Department’s draft language for “how” and “where” disclosures shall be made on institution’s web sites needs more specificity. Institutions’ websites have become more complicated and often disclosures are buried by the number of clicks required to reach them, by uninformative headings that steer people away from the disclosures, or by other means that obscure the information. For this reason, the Department should use language that requires the institution to provide the disclosures “prominently, clearly and conspicuously” on its Web site.

The standard of “clearly and conspicuously” has been defined by the Federal Trade Commission:

“Clear and Conspicuous” means that a disclosure is reasonably understandable and designed to call attention to the nature and significance of the information in the disclosure. More specifically, it means that the disclosure must be: (a) disclosed in such size, contrast (shade) and location that it is readily noticeable and readable; (b) does not contradict any other information provided in any manner; and (c) presented in close proximity to any other statement that it modifies, explains, or clarifies. With respect to any visual disclosures, to be “clear and conspicuous” they must be of sufficient size and contrast and of a sufficient duration to be easily read. See, 16 C.F.R. § 313.3(b).

The FTC routinely publishes guidance about how to comply with the “clearly and conspicuously” standard in order to avoid misrepresenting material information that consumers rely on to make informed decisions. See, *.Com Disclosures: How to Make Effective Disclosures in Digital Advertising*, Federal Trade Commission, March 2013, at <http://ftc.gov/os/2013/03/130312dotcomdisclosures.pdf>. The FTC provides the following guidance in its *.Com Disclosures* publication, which is instructive for how the Department can strengthen the gainful employment requirements for disclosures on institutions’ web sites and in promotional materials:

- Do not assume consumers read the entire website
- Scrolling increases the risk that consumers will miss a disclosure
- If disclosures require scrolling then place text or visual cues to encourage consumers to scroll. A scroll bar isn't sufficient.
- Instructions should be clear.<sup>5</sup>
- If scrolling is necessary for the disclosure then it should be unavoidable (e.g. consumer cannot click forward without scrolling through the disclosure)
- Optimize websites for mobile devices and tablets so consumers do not have to scroll left or right to see disclosures.
- Place disclosure near trigger claim.
- Do not place disclosure after a large blank space, unrelated information or graphics because the consumer might not see the disclosure or think it's unrelated.
- Disclosures that are an integral part of a claim or inseparable should not be communicated through a **hyperlink**. This is particularly true for information about cost.
- Use a hyperlink if disclosures are too complex to describe adjacent to a claim.
- Hyperlink should be clearly labeled and should appear adjacent to the claim.
  - Hyperlinks that say "disclaimer, more information, details, terms and conditions" are inadequate.
  - Hyperlinks should not be symbols.
  - Hyperlinks should take the consumer directly to the information.
- Disclosures must take place prior to purchase.
- Do not use disclosures via pop-ups because they can be blocked by software.
- Repetition of disclosures may be necessary if the website and/or the application is lengthy.

With respect to promotional materials on the Internet:

- If using a teaser ad that leads to a website, then put disclosure prominently on website so the consumer will be directed to it.
- The size of a disclosure should be compared to the size, text and color of the ad. Format in a similar manner so the consumer can relate back the disclosure with the claim.
- Account for viewing differences with smartphones, computers and tablets. Optimize so the disclosure is clear and conspicuous on all devices.

With respect to social media, such as Facebook and Twitter:

- Disclosure can be easily incorporated in space constrained ad with either a link directly to disclosure or disclosure itself within the ad

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<sup>5</sup> e.g. "See below for important information about jobs and debt" is more clear than a general instruction such as "See below for more information."

- Twitter: do not assume consumers will see each constrained ad, include disclosure or link in every ad.
- If using a teaser ad that leads to a website, then put disclosure prominently on website.

With respect to promotional materials in print, such as newspaper, magazine, flyers, billboards:

- Fine print or footnotes cannot be used to disclaim, limit, or explain claims made elsewhere in the ad.
- Consider: prominence, presentation, placement and proximity. Fine print may be inadequate to modify a claim elsewhere in the ad
- Do not assume consumers read every word on a printed page.

With respect to multimedia, including television, audio, commercials on the computer:

- If you make an audio claim, use an audio disclosures
- If you make a written claims, use a written disclosure
- If there is a visual claim, use a visual disclosure for a sufficient duration
- Even if consumers are viewing through multiple media (surfing the web or tv) this does not relieve requirement that disclosures be made clearly and conspicuously.

### **Disclosures provided to prospective students**

The draft language in 410 requires intuitions to provide to each prospective student as a separate document at the time the institution first provides the student information about the program and at the time the student enrolls in the program, a copy of the disclosure template. This is a step in the right direction, but it does not go far enough to properly inform students about the key information and outcomes associated with the GE program(s).

The admissions interview is critical. State attorneys general have observed admissions consultants orally misrepresenting key pieces of information, such as tuition costs, jobs and earnings, and transfer of credits during admissions interviews. See, *State of Colorado, ex rel. John Suthers v. Alta Colleges d/b/a Westwood College*, 12CV1600, Complaint filed March 14, 2012:

<http://www.coloradoattorneygeneral.gov/sites/default/files/Westwood%20complaint.pdf>.

Written disclosures that contradict the oral statements are hidden in bulky enrollment agreements and paperwork. Students decide to enroll in a particular program based on the sunny statements – often about potential careers and earnings -- from the admissions consultants only to realize later that the tuition costs are substantially more than what was represented, the actual jobs and earnings related to the program are dismal, and the students are stuck because they cannot transfer their credits to another school.

Recently, the New York Attorney General settled with Career Education Corporation (CEC) for misrepresenting job placement rates to prospective students. The NYAG's settlement enjoined CEC from making any verbal representations to prospective students concerning the placement rates and, instead, if a student asks about job placement, the admissions rep is to provide a written disclosure to the student. See, <http://www.ag.ny.gov/press-release/ag-schneiderman-announces-groundbreaking-1025-million-dollar-settlement-profit>.

Without offending the First Amendment, the Department can legally require affirmative verbal disclosures consistent with affirmative written disclosures, neither of which misleading, in order to protect prospective students from deceptive enrollment tactics. See, *Milavetz, Gallop & Milavetz, P.A. v. United States*, 559 U.S. 229, 250 (U.S. 2010) (holding that required advertisement disclosures imposed on debt relief agencies constitutional because of government's interest in protecting consumers from deception).

Accordingly, the Department should require institutions at the time of the admissions interview to provide a separate written document that displays the disclosure templates about each GE program that the student is interested in AND to orally review the information in the template that relates to the specific program(s). The institution's admissions statements – verbal, visual, or written – cannot contradict the information in the disclosure template. Doing so would be considered a substantial misrepresentation under the regulations, 34 CFR § 668.71(b)<sup>6</sup>:

An eligible institution is deemed to have engaged in substantial misrepresentation when the institution itself, one of its representatives, or any ineligible institution, organization, or person with whom the eligible institution has an agreement to provide educational programs, marketing, advertising, recruiting or admissions services, makes a substantial misrepresentation about the nature of its educational program, its financial charges, or the employability of its graduates.

34 CFR § 668.61(c) further states:

A misleading statement includes any statement that has the likelihood or tendency to deceive. A statement is any communication made in writing, visually, orally, or through other means.

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<sup>6</sup> The Department published revised, finalized regulations in the Federal Register that amend or remove regulatory provisions in order to make the Department's regulations consistent with the D.C. Circuit Court's opinion in *Association of Private Sector Colleges and Universities v. Duncan*, 681 F.3d 427 (D.C. Cir. 2012). See, Supplemental Information, 78 Fed. Reg. at 57, 798 (Sept. 20, 2013). Some of the Misrepresentation Regulations, including 34 CFR §668.71, were affected by this decision. The portions cited herein are consistent with the Department's revised regulations.

Similar to the Department's misrepresentation regulations, the disclosure regulations serve a legitimate state interest to ensure that schools receiving federal funds do not deceive prospective students into accepting loans that they cannot repay. See, *Ass'n of Private Sector Colleges & Univs. v. Duncan*, 681 F.3d 427, 457 (D.C. Cir. 2012).

Please see the draft proposed language for portions of §668.410:

(c) Disclosure information on web pages. On any Web page containing general, academic, or admissions information about a GE program, the institution must provide prominently, clearly and conspicuously the disclosure template for the specific program. This means:

(i) The disclosure template must be of such size, contrast (shade) and location that it is readily noticeable and readable, meaning its location does not require scrolling in order to notice it; and

(ii) The disclosure template must be presented in close proximity to any other statement that it modifies, explains or clarifies, meaning the template must appear immediately beneath the name of the program and primary to any other description of the program;

(d) Promotional materials. (1) All promotional materials about the GE program that an institution makes available to prospective students must include the information on the disclosure template presented

prominently, clearly and conspicuously and must comply with the requirements set forth in (c)(i)-(ii).

(2) Where space or airtime would preclude the information on the disclosure template from being disclosed as described in (c)(i)-(ii), an institution may directly link (one click) to a separate web page that contains only the specific GE program disclosure template. If a GE program is offered at multiple locations, an institution may directly link (one click) to a page that lists only the GE program and its locations, each hyperlinked directly to a separate web page that contains only the specific GE program disclosure template.

(3) Placement and appearance of the link must comply with (c)(i)-(ii). The institution must identify the link as follows: "Jobs, Earnings, Affordability and Student Loan Warnings about [name of program]."

(4) If the promotional material specifies more than one GE program, the institution may directly link (less than one click) to a web page containing only a list of its GE programs, each program name completely spelled-out and hyperlinked directly (one click) to a web page that contains only the specific GE program disclosure template.

(5) The institution must disclose the information on

the disclosure template in audio if the promotional materials are in audio, i.e. Television and radio ads.

(6) Promotional materials include, but are not limited to, an institution's catalogs, invitations, flyers, billboards, and advertising on radio, television, the Internet, or social media account.

(7) The institution must ensure that all promotional materials, including printed materials, about a GE program are accurate and current at the time they are published, approved by a State agency, or broadcast.

(e) Direct distribution to students. An institution must provide to each prospective student at the time the institution first provides the student information about any GE program, at the time the student enrolls in any GE program, and at any time a student signs financial aid forms in order to enroll or remain enrolled in any GE program:

(i) A separate document that contains only the disclosure template for the specific, relevant GE program; and concurrently

(ii) A verbal explanation of the contents of the disclosure template.

(j) The institution shall not contradict in any manner the information in the disclosure template.

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