

A 3D puzzle with one blue piece and one white piece standing out from a grey background. The blue piece is on the left, and the white piece is on the right. The text is overlaid on the puzzle.

***Is your Institution Ready for a
Compliance Check?***

**CAPPS 35 th. Annual Conference
Driving Towards the Day Light**



Presenters

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Agenda

- Fiscal Reports
- Student Eligibility
- Student Records
- Consumer Information
- Compliance Checklist
- Best Practices



Fiscal Reports

- Are the fiscal reports completed timely?
 - Pell monthly reconciliation
 - G5 drawdowns
 - DL monthly SAS reports
 - Bank statements reconciled
 - Cash flow
 - Compare anticipated with actual disbursements
 - Title IV current
 - Institution collections



Student Eligibility

- Valid proof of high school
- Professional judgment / dependency override documented and policy followed
- Comment codes resolved
 - Selective Service
 - Eligible non-citizen; Third Party Verification
 - Unusual Enrollment History (UEH)
 - Subsidized Usage Limit Applies (SULA)
 - Pell Lifetime Eligibility Used - 6 year max eligibility



Student Records

- School application/enrollment agreement
- Valid processed ISIR/ SAR
- Proof of entrance/exit counseling
- Parent Plus denial (as applicable)
- Loan disbursement notifications
- Verifications complete and accurate
- Conflicting information resolved
- LOA documented and complete



Student Records

- Accurate attendance
- Satisfactory academic progress documented
- Credit balances (calculated correctly/paid timely)
- Student ledger
- Enrollment status changes (NSLDS)
- R2T4 & Institutional refund calculations
 - Accurate & timely, 14 days after LDA
 - Step 5
 - School must offer student PWD if applicable
 - R2T4 still completed even if student earned 100%(60%or more of PP/POE)



Consumer Information

- Website accurate and up to date
 - Net price calculator
 - College Navigator Website
 - Catalogs/student handbooks
 - Institution Information
- Policies and procedures
 - Valid high school policy
 - GE early implementation documented
 - Comment code resolution
 - Cohort default management
 - Direct Loan –Code of Conduct



Consumer Information

- Institutional information
- Financial assistance Information
- Drug & alcohol prevention
- Student Right to Know Act
- Clery Act
- VAWA & Title IX
- Vaccination policy
- Copyright information
- Student diversity
- FERPA
- Safeguarding customer information
- Misrepresentation
- Textbook information (correct ISBN)
- Constitution and citizenship day



Compliance Checklist

1. Run, read, and understand reports from institution's software
 - a. Cash flow
 - b. Administrative Capability (Separation of Duties)
2. Ensure student information is protected from data breaches
3. Accrediting agency, state approvals, and ECAR are accurate, PPA lower tier form complete
4. Check for prior audit findings, corrective action plans are in place and working



Checklist for Compliance

5. Credit balances paid timely
6. Ledger posting accurate, agree with COD
7. Clery/VAWA Policies complete and disseminated timely
8. Ongoing VAWA training
9. Updated Policies & Procedures manual
10. Trained financial aid staff



Best Practices

- Get and stay organized
- Use past audit reports as teaching tools
- Ensure that the website, catalogs, and student handbooks are current and correct
- School contacts are current and have alternative methods to reach the officers listed on the ECAR
- Training is continuous effort by school, attend webinars, conferences, on line training



Resources

- ❖ <https://ifap.ed.gov/fsahandbook/attachments/1819FSAHbkVol2Ch6.pdf>
- ❖ <https://ifap.ed.gov/fsahandbook/attachments/1819FSAHbkVol2Ch7.pdf>
- ❖ <https://ifap.ed.gov/eannouncements/Cyber.html>
- ❖ <https://ifap.ed.gov/CashManagementInfo/index.html>
- ❖ <https://fameconnect.fameinc.com/FASPM/A.%202019-2020%20Award%20Year/2.%20Appendix/L-02%20%20Consumer%20Information%20Analysis.pdf>

Consumer Information Assessment

- ❖ <https://ifap.ed.gov/FSAAssessments/ConsumerInformation20182019.html>