Compliance—it's not just for the aid office

- Title IV Aid Rules and Regulations cover a lot of ground
- Aid offices are in the weeds when it comes to daily work and processes
  - Return to Title IV Verification, student eligibility just to name a few
  - Issues due to complexity, staffing and timing
  - Policy documents don’t mirror what is actually being processed
- Once/twice a year processes
- Compliance pieces that sit outside of the FA office
- What are some of the areas and compliance activities that sit outside your office?
Why does compliance matter?

Top 10 Compliance Audit Findings

- Repeat Finding – Failure to Take Corrective Action
- Student Status – Inaccurate/Untimely Reporting
- Return of Title IV (R2T4) Calculation Errors
- Return of Title IV (R2T4) Funds Made Late
- Verification Violations
- Student Credit Balance Deficiencies
- Qualified Auditor’s Opinion Cited in Audit
- Pell Grants – Overpayment/Underpayment
- G5 Expenditures Untimely/Incorrectly Reported
- Entrance/Exit Counseling Deficiencies

Source: FSA conference Breakout Session #13, Top Audit and Program Review Findings 2021

Why does compliance matter?

Top 10 Program Review Findings

- Student Status – Inaccurate/Untimely Reporting
- Return of Title IV (R2T4) Calculation Errors
- Student Credit Balance Deficiencies
- Entrance/Exit Counseling Deficiencies
- Verification Violations
- Crime Awareness Requirements Not Met
- Inaccurate Recordkeeping
- Bank Accounts – Federal Funds Not Identified
- Consumer Information Requirements Not Met
- Satisfactory Academic Progress Policy Not Adequately Developed/Monitored

Source: FSA conference Breakout Session #13, Top Audit and Program Review Findings 2021

It Matters Because....

- We have to demonstrate Administrative Capability (34 CFR 668.16)
- "An institution must demonstrate to the Department that it has the administrative capability to participate in Title IV programs. Evaluation and monitoring..."
- Fines and Bad Press
- Job security

"The institution must demonstrate to the Department that it has the administrative capability to participate in Title IV programs. Evaluation and monitoring..."
Why do we need our partners?

- Compliance with federal and state regulations
  - Administrative Capability
  - Cash Management
  - Clery Act
  - Data Breach reporting
  - Courses toward degree
  - FERPA
  - Gainful Employment
  - State Licensure
  - Accreditation (HLC, etc.)

Why do we need our partners?

- Information sharing
  - New Programs/Degrees
    - Competency Based Education
    - Aid for Subscriptions
    - New Locations
    - Academic Calendar and Breaks
  - Reporting
    - Clearinghouse
    - Foreign Gift Reporting

Why do we need our partners?

- Recruiting and retaining students
  - Eligible students in eligible programs
  - Scholarship awarding/Fund management
  - Work study processes
  - Athletics-Assist, NIL
  - Mandatory reporting/students at risk
  - Creating an environment for success
  - Handoffs between departments
How to build relationships

• Meet with your partners
• Thank them for their work
• Highlight the good
• Discuss opportunities for better partnerships
• Reassure
  • Compliance is all of our jobs, but don’t use it as a means to bully
  • Want to work with, not against
  • Early notice is best for innovative programs/changes

How to build relationships

• Explain the ask
  • Why do you need to know?
  • What data do you need?
  • Don’t hide behind the statement “it’s a federal regulation”
  • What is on the line if we do or don’t follow the regulations
    • Cite audits, fines, student eligibility if you need to, but don’t use as a scare tactic
• Offer your support
  • Work together, not against when dealing with a difficult situation/office/person
  • Find common ground and remove silos

Questions??

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