

**Building Your Campus Compliance Community**  
 Angela Karlin  
 University of Kansas  
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**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?

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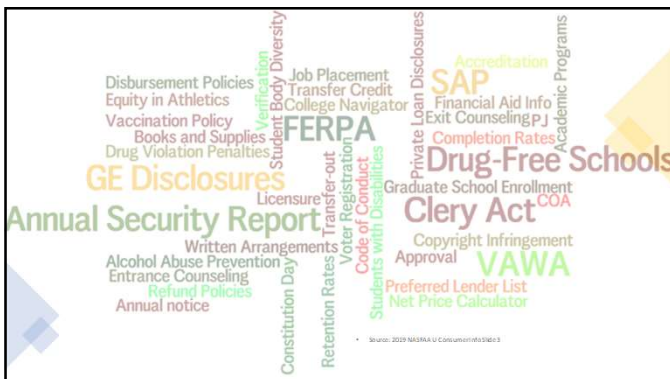
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**Why does compliance matter?**

**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

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**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

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**It Matters Because....**




**We have to demonstrate Administrative Capability (34 CFR 668.16)**




**"An institution must demonstrate to the Department that it is administratively capable to participate in Title IV programs"**

Institution-wide responsibility  
Opt in with the signed Program Participation Agreement  
Foundation of compliance with all laws and regulations.



**Fines and Bad Press**



**Job security**

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### Consumer Information Responsibility

Registrar	Administration	Student Housing
Campus Police	Legal Counsel	Business Office
Student Health Services	Provost	Bursar
Disability Services	In-House Auditors	Book Store
Institutional Research	Athletics	Counseling Center
Office of Communications	Information Technology Services	Veterans Services
Human Resources	Admissions	Career Services
Study Abroad Office	Financial Aid Office	

Source Slide 7, NASFAA U Credential

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### Other Programs and Policies

- Drug and Alcohol Abuse Prevention
- Copyright Infringement
- Special Services and Facilities
- Vaccination Policies
- Voter Registration
- Constitution Day and Citizenship Day
- Family Educational Rights and Privacy Act (FERPA)



Slide 8 © 2022 NASFAA

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## Campus Partners: Build your Team

- Key Campus Partners
- How to cultivate a working relationship
- Getting the information and support you need
- Discussion

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**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.)

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**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

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**Why do we need our partners?**

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

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**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

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**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

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**Questions??**

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