

# TOP 10 COMPLIANCE FINDINGS

Pam Gilligan | Training Officer  
U.S. Department of Education  
NDASFAA Spring Conference

April 2021



**Federal Student Aid**  
*An OFFICE of the U.S. DEPARTMENT of EDUCATION*

# AGENDA

---

- 01 Top 10 Compliance Audit and Program Review Findings
- 02 Audit Findings – Causes and Solutions
- 03 Program Review Findings – Causes and Solutions
- 04 Contact Information
- 05 Resources by Top 10 Findings
- 06 Top 10 Resources for Compliance Solutions

# TOP 10 COMPLIANCE AUDIT AND PROGRAM REVIEW FINDINGS

---

# TOP 10 COMPLIANCE AUDIT FINDINGS

---

# TOP 10 COMPLIANCE AUDIT FINDINGS

---

1. Student Status – Inaccurate/Untimely Reporting
2. Repeat Finding – Failure to Take Corrective Action
3. Return of Title IV (R2T4) Calculation Errors
4. Return of Title IV (R2T4) Funds Made Late
5. Verification Violations

# TOP 10 COMPLIANCE AUDIT FINDINGS

---

6. Qualified Auditor's Opinion Cited in Audit
7. Student Credit Balance Deficiencies
8. Entrance/Exit Counseling Deficiencies
9. G5 Expenditures Untimely/Incorrectly Reported
10. Pell Grants – Overpayment/Underpayment

# TOP 10 PROGRAM REVIEW FINDINGS

---

# TOP 10 PROGRAM REVIEW FINDINGS

---

1. Student Status – Inaccurate/Untimely Reporting
2. Return to Title IV (R2T4) Calculation Errors
3. Entrance/Exit Counseling Deficiencies
4. Verification Violations
5. Consumer Information Requirements Not Met



# TOP 10 PROGRAM REVIEW FINDINGS

---

6. Satisfactory Academic Progress Policy Not Adequately Developed/Monitored
7. Student Credit Balance Deficiencies
8. Lack of Administrative Capability
9. Account Records Inadequate/Not Reconciled
10. Crime Awareness Requirements Not Met

# TOP 10 COMPLIANCE AUDIT AND PROGRAM REVIEW *SHARED FINDINGS*

---

# SHARED FINDINGS

---

- Student Status – Inaccurate/Untimely Reporting
- Return to *Title IV* (R2T4) Calculation Errors
- Verification Violations
- Student Credit Balance Deficiencies
- Entrance/Exit Counseling Deficiencies

# Compliance Audit Findings



# STUDENT STATUS – INACCURATE/UNTIMELY REPORTING

---

- Inaccurate reporting of enrollment status and effective dates
- Failure to report last date of attendance/changes in student enrollment status
- Inaccurate reporting of program–level data
- Untimely reporting of specific student information
- Untimely submission of NSLDS® Roster file

*Regulation: 34 C.F.R. § 685.309(b)*

# ENROLLMENT REPORTING SOLUTIONS

---

- Establish electronic enrollment reporting schedule
- Implement process to track and monitor enrollment status changes
- Train staff on reporting requirements and procedures
- Create or strengthen institutional policies and procedures
- Originate loans as early as possible
- Add students to transfer monitoring

# REPEAT FINDING – FAILURE TO TAKE CORRECTIVE ACTION

- Failure to implement Corrective Action Plan (CAP)
- Instances of noncompliance unresolved by CAP
- Ineffective CAP used from previous year(s)
- Internal controls inadequate to ensure compliance with FSA guidelines

*Regulations: 34 C.F.R. §§ 668.16 and 668.174(a)*

# REPEAT FINDING SOLUTIONS

---

- Create effective Corrective Action Plan (CAP)
- Share CAP with all accountable offices
- Assign CAP monitoring responsibilities to specific staff
- Establish target dates to review CAP effectiveness
- Create new policies and procedures
- Train staff on required processes



# R2T4 CALCULATION ERRORS

---

- Incorrect number of days used in term/payment period
- Incorrect clock-hours used in payment period
- Incorrect withdrawal date
- Incorrect aid used as “could have been disbursed”
- Incorrect Post-Withdrawal Disbursement
- Mathematical and rounding errors
- Incomplete R2T4 policy

*Regulation: 34 C.F.R. § 668.22*

# R2T4 CALCULATION SOLUTIONS

---

- Establish correct academic calendar in online R2T4 calculator
- Create scheduled hours chart for programs
- Verify withdrawal date and date of determination
- Provide correct information to Third-Party Servicer
- Develop/Evaluate R2T4 policies and procedures
- Train staff on R2T4 calculations
- Create peer review system to check for accuracy
- Review R2T4 consumer information policy

## R2T4 FUNDS MADE LATE

---

- Returns not made within 45-day allowable timeframe
  - School's policy and procedures not followed
  - Inadequate system in place to identify/track official and unofficial withdrawals
  - No system in place to track number of days remaining to return funds

*Regulations: 34 C.F.R. §§ 668.22(a)(6), (j), and 668.173(b), (c), (d)*

# TIMELY RETURN OF FUNDS SOLUTIONS

---

- Coordinate student withdrawal process with registrar and student accounts
- Develop R2T4 tracking system
- Develop/evaluate R2T4 policies and procedures
- Develop/evaluate official/unofficial withdrawal policies and procedures
- Train all staff involved in student withdrawal process

# VERIFICATION VIOLATIONS

---

- Inaccurate verification of selected applicants
- Verification documentation missing/incomplete
- Interim disbursement rules not followed
- Conflicting data not resolved
- Missing verification policies

*Regulations: 34 C.F.R. §§ 668.51– 668.61 (Subpart E) and 668.16(f)*

# VERIFICATION SOLUTIONS

---

- Develop/enhance verification policies and procedures
- Use/create verification checklist
- Use straight edge tool when reviewing tax information
- Resolve conflicting information
- Monitor ISIR corrections processing and status codes
- Create peer review system to check for accuracy
- Develop/review verification consumer information policy

# QUALIFIED AUDITOR'S OPINION CITED IN AUDIT

---

- Anything other than unqualified opinion
- Serious deficiencies/areas of concern in compliance audit/financial statements
  - R2T4 violations
  - Inadequate accounting systems and/or procedures
  - Lack of internal controls

*Regulations: 34 C.F.R. §§ 668.16(a)–(c), and 668.171(h)*

# QUALIFIED AUDITOR'S OPINION SOLUTIONS

---

- Design institution-wide action plan when necessary
- Implement effective and timely Corrective Action Plan
- Address serious deficiencies using measurable steps
  - Develop correct policies and procedures
  - Provide staff training
  - Peer review system
  - Set milestones for improvements



# STUDENT CREDIT BALANCE DEFICIENCIES

---

- Lack of internal controls to manage credit balance process
- Credit balance not released to student within 14 days
- Credit balances not released by end of loan period or award year
- Unclaimed credit balances not returned
- Inadequate Title IV credit balance authorization

*Regulations: 34 C.F.R. §§ 668.164(h) and 668.165(b)*

# STUDENT CREDIT BALANCE SOLUTIONS

---

- Establish internal controls to guarantee timely release of funds
- Create policies and procedures that implement requirements
- Train staff responsible for Title IV credit balance refunds
- Conduct periodic self-audits of Title IV credit balance process
- Pay held credit balances before end of loan period or award year
- Review credit balance authorization for all required elements

# ENTRANCE/EXIT COUNSELING DEFICIENCIES

---

- Exit counseling not conducted/documentated for withdrawn students or graduates
- Exit counseling materials not mailed to students who failed to complete counseling
- Exit counseling completed late

*Regulation: 34 C.F.R. §§ 668.24(c)(1)(v) and 685.304*

# ENTRANCE/EXIT COUNSELING SOLUTIONS

---

- Coordinate student enrollment process with registrar and student accounts
- Post studentaid.gov loan counseling links and requirements on school website
- Make exit counseling requirement for graduation
- Develop system to provide all less-than-half-time and nonattending students exit counseling notification and materials within 30 days
  - Provide materials to students by email or mail
  - Include direct link to or attach *Direct Loan Exit Counseling Guide* and/or other materials when emailing students

# G5 EXPENDITURES UNTIMELY/INCORRECTLY REPORTED

---

- Failure to submit disbursement records to COD within 15 days after making or adjusting disbursements
- Disbursement dates on student ledgers do not match disbursement dates in COD
- Disbursement amounts on student ledger do not match disbursement amounts in COD

*Regulations: 34 C.F.R. §§ 668.164, 685.301(c), and 690.83*

# G5 EXPENDITURES SOLUTIONS

---

- Develop/enhance disbursement rules policies and procedures
- Submit/adjust COD disbursement records timely
- Immediately update COD estimated disbursement dates when aid is posted to student's account
- Perform periodic reconciliation of disbursement dates and amounts
- Send correct disbursement dates to Third-Party Servicer

# PELL GRANT OVERPAYMENT/UNDERPAYMENT

---

- Incorrect Pell Grant formula
- Inaccurate calculations
  - Proration
  - Incorrect EFC
  - Incorrect number of weeks/hours
- Change in enrollment status

*Regulations 34 C.F.R. §§ 690.62-690.63, and 690.79-690.80*

# PELL GRANT AWARDING SOLUTIONS

---

- Establish policies and procedures to strengthen awarding process
- Use packaging worksheet or system to document Pell award
  - Scheduled Award
  - Enrollment status *or* clock hours and number of weeks
  - Transfer credits
  - Award proration when necessary
- Implement process to check enrollment status before disbursement
- Train staff on Pell awarding
- Conduct file reviews



# Program Review Findings



# TOP 10 PROGRAM REVIEW FINDINGS

---

1. Student Status – Inaccurate/Untimely Reporting
2. Return to Title IV (R2T4) Calculation Errors
3. Entrance/Exit Counseling Deficiencies
4. Verification Violations
5. Consumer Information Requirements Not Met

# TOP 10 PROGRAM REVIEW FINDINGS

---

6. Satisfactory Academic Progress Policy Not Adequately Developed/Monitored
7. Student Credit Balance Deficiencies
8. Lack of Administrative Capability
9. Account Records Inadequate/Not Reconciled
10. Crime Awareness Requirements Not Met

# CONSUMER INFORMATION REQUIREMENTS NOT MET

---

- Incomplete/missing elements:
  - Institutional financial assistance information
  - Institutional information
  - Health and safety information
  - Disclosures of institutional outcomes
  - FERPA disclosure information
  - NSLDS<sup>®</sup> disclosure information
  - Equity in Athletics information

*Regulations: 34 C.F.R. §§ 99.7, 668.41-668.45, and 668.47-668.48*

# CONSUMER INFORMATION SOLUTIONS

---

- Design institution-wide action plan
  - Divide requirements by responsible office
  - Assign specific responsibilities to staff
- Make information easily accessible
- Keep consumer information disclosures in one place
- Use FSA resources
  - Consumer Information Disclosures At-A-Glance
  - Federal Student Aid Handbook – Appendix F
  - FERPA Model Notification Postsecondary Officials

# SATISFACTORY ACADEMIC PROGRESS POLICY NOT ADEQUATELY DEVELOPED/MONITORED

---

- Inadequate Satisfactory Academic Progress (SAP) Policy
  - Missing elements
  - Incorrect elements
- Failure to apply SAP policy
- Incorrect SAP assessments
- Insufficient or missing documentation to support SAP
- Aid disbursed to students not meeting SAP standards

*Regulations: 34 C.F.R. §§ 668.16(e), 668.32(f) and 668.34*

# SATISFACTORY ACADEMIC PROGRESS SOLUTIONS

---

- Review/revise SAP policy to include all correct elements
- Publish revised SAP policy in consumer information
- Retain SAP document in student file or store documentation in system
- Strengthen policies and procedures to consistently apply SAP standards
- Train staff on SAP procedures
- Conduct periodic random file reviews

# LACK OF ADMINISTRATIVE CAPABILITY

---

- Serious and systemic violations
- Incapable and/or inadequate staffing
- Evidence of issues affecting Title IV administration
- Otherwise appears to lack ability to competently administer Title IV programs

*Regulations: 34 C.F.R. § 668.16*



# STANDARDS OF ADMINISTRATIVE CAPABILITY SOLUTIONS

---

- Designate capable individuals to coordinate Title IV administration
- Hire adequate number of staff
- Create/strengthen policies and procedures
- Provide recurring staff training
- Submit applications/reports to ED timely
- Protect student information
- Develop quality Default Prevention Plan
- Use peer review system to detect errors and negligence

# ACCOUNT RECORDS INADEQUATE/NOT RECONCILED

---

- Inaccurate disbursement records
  - Late submission of disbursement records in COD
  - COD records do not match student ledgers
- Inaccurate fiscal records and accounting for funds
  - Failure to reconcile Title IV accounts
  - Failure to identify Title IV bank accounts

*Regulations: 34 C.F.R. §§ 668.24, 668.161-668.167,  
674.19, 675.19, 676.19,  
685.300(b)(5), 685.301(c),  
and 690.83*

# ACCOUNT RECORDS SOLUTIONS

---

- Implement solutions for G5 expenditures audit finding
- Follow Heightened Cash Monitoring rules, if required
- Maintain accurate and complete fiscal records
  - Reconcile Title IV accounts monthly
  - Verify “Federal” in each Title IV bank account title
  - Demonstrate clear audit trail from subsidiary to general ledger accounts
  - Use understandable student account statement/ledger system
- Drawdown funds for immediate use only

# CRIME AWARENESS REQUIREMENTS NOT MET

---

- Annual Security Report (ASR) requirement not met
  - ASR not distributed by October 1
  - Incomplete ASR
- Campus security policies not adequately developed
- Crime tracking system inadequate or missing
- Crime statistics reporting discrepancies

*Regulations: 34 C.F.R. §§ 668.41, 668.46, and 668.49*

# CRIME AWARENESS SOLUTIONS

---

- Design institution-wide action plan
  - Forward ED campus security information to responsible office
  - Develop multi-office team responsible for ASR preparation, timely distribution, and record retention
  - Establish peer review of campus security disclosures
- Make campus safety information easily accessible
- Use FSA resources
  - The Handbook for Campus Safety and Security Reporting
  - Consumer Information Disclosures At-A-Glance
  - Federal Student Aid Handbook – Appendix F

# SCHOOL ELIGIBILITY AND OVERSIGHT SERVICE GROUP (SEOSG)

**Nancy Gifford – Acting Director, School Eligibility and Oversight Service Group**  
215-656-6436

School Eligibility and Oversight Service Group General Number: 202-377-3173 or email: [CaseTeams@ed.gov](mailto:CaseTeams@ed.gov)

Or call/email the appropriate School Participation Division below for information and guidance on audit resolution, financial analysis, program reviews, school and program eligibility/recertification, and school closure information.

## **New York/Boston School Participation Division**

*Connecticut, Maine, Massachusetts, New Hampshire, Rhode Island, Vermont,*

*New Jersey, New York, Puerto Rico, Virgin Islands*

E-mail Mailbox: [NYBostonSPD@ed.gov](mailto:NYBostonSPD@ed.gov)

**Betty Coughlin, Division Chief** 646-428-3737

**Chris Curry – New York** 646-428-3738

**Jennifer Uhlir – Boston** 617-289-0121

**Teresa Martinez – New York** 646-428-3748

## **Philadelphia School Participation Division**

*District of Columbia, Delaware, Maryland, Pennsylvania, Virginia, West Virginia*

E-mail Mailbox: [PhiladelphiaSPD@ed.gov](mailto:PhiladelphiaSPD@ed.gov)

**Sherrie Bell, Acting Division Chief** 202-377-3349

**Bronsdon Thompson – Philadelphia** 202-377-3747

## **Multi-Regional and Foreign Schools**

### **Participation Division**

E-mail Mailbox: [Multi-RegionalSPD@ed.gov](mailto:Multi-RegionalSPD@ed.gov)

[FSA.Foreign.Schools.Team@ed.gov](mailto:FSA.Foreign.Schools.Team@ed.gov)

**Michael Frola, Division Chief** 202-377-3364

**Mark Buszkohl – Washington, DC** 202-377-4572

**Michelle Allred – Dallas** 214-661-9466

**Julie Arthur – Seattle** 206-615-2232

**David Garza – Dallas** 214-661-9694

## **Atlanta School Participation and Financial Analysis Division**

*Alabama, Florida, Georgia, Mississippi, North Carolina, South Carolina*

E-mail Mailbox: [AtlantaSPD@ed.gov](mailto:AtlantaSPD@ed.gov)

**Christopher Miller, Division Chief** 404-974-9297

**Vanessa Dillard – Atlanta** 404-974-9418

**Vinita Simpson – Atlanta** 404-974-9260

## **Dallas School Participation Division**

*Arkansas, Louisiana, New Mexico, Oklahoma, Texas*

E-mail Mailbox: [DallasSPD@ed.gov](mailto:DallasSPD@ed.gov)

**Cynthia Thornton, Division Chief** 214-661-9457

**Jesus Moya – Dallas** 214-661-9472

**Kim Peeler – Dallas** 214-661-9471

## **Kansas City School Participation and Third-Party Servicer Division**

*Iowa, Kansas, Kentucky, Missouri, Nebraska, Tennessee*

E-mail Mailbox: [KansascitySPD@ed.gov](mailto:KansascitySPD@ed.gov)

[FSAPC3rdpartyserviceroversight@ed.gov](mailto:FSAPC3rdpartyserviceroversight@ed.gov)

**Dvak Corwin, Division Chief** 816-268-0420

**Angie Beam – Kansas City** 816-268-0534

**Kathy Feith – Kansas City** 816-268-0406

## **Chicago/Denver School Participation Division**

*Illinois, Minnesota, Ohio, Wisconsin, Indiana, Colorado, Michigan, Montana, North Dakota, South Dakota, Utah, Wyoming*

E-mail Mailbox: [Chicago.Denver.SPD@ed.gov](mailto:Chicago.Denver.SPD@ed.gov)

**Jeremy Early, Division Chief** 312-730-1529

**Jason Charlton – Chicago** 312-730-1695

**Tammi Sawyer – Chicago** 312-730-1531

**Brenda Yette – Chicago** 312-730-1522

## **San Francisco/Seattle School Participation Division**

*American Samoa, Arizona, California, Guam, Hawaii, Nevada, Palau, Marshall Islands, North Marianas, State of Micronesia, Alaska, Idaho, Oregon, Washington*

E-mail Mailbox: [Sanfrancisco.Seattle.SPD@ed.gov](mailto:Sanfrancisco.Seattle.SPD@ed.gov)

**Martina Fernandez-Rosario, Division Chief**

**415-486-5605**

**Erik Fosker – San Francisco** 415-486-5606

**Kim Meadows – Washington, DC** 202-377-3058

# RESOURCES BY TOP 10 FINDINGS

---

# RESOURCES BY TOP 10 FINDINGS

---

- **Student Status – Inaccurate/Untimely Reporting**

- Regulation: 34 C.F.R. § 685.309(b)

- NSLDS® Enrollment Reporting Guide

(<https://fsapartners.ed.gov/knowledge-center/library/nslds-user-resources/2019-11-25/nslds-enrollment-reporting-guide-november-2019>)

- NSLDSFAP website - newsletter updates ([nsldsfap.ed.gov/nslds\\_FAP/](https://nsldsfap.ed.gov/nslds_FAP/))
  - “News & Events” menu item



# RESOURCES BY TOP 10 FINDINGS

---

- **Repeat Finding (Audit)**
  - Regulations: 34 C.F.R. §§ 668.16 and 668.174(a)
  - FSA Assessments: Assessments Addressing School Topics – A Guide to Creating a Policies and Procedures Manual
  - Federal Student Aid Handbook, Volume 4, Appendix B (Policies and procedures manuals and internal controls)

# RESOURCES BY TOP 10 FINDINGS

---

- **R2T4 Calculation Errors and R2T4 Made Late**
  - Regulations: 34 C.F.R. §§ 668.22 and 668.173(b)
  - FSA Assessments: Assessments Addressing School Topics – Return of Title IV Funds
  - *FSA Handbook, Volume 5*
  - R2T4 Worksheets
    - Electronic Web Application ([cod.ed.gov](https://cod.ed.gov))
    - Paper (*FSA Handbook, Appendix to Volume 5*)

# RESOURCES BY TOP 10 FINDINGS

---

- **Verification Violations**
  - Regulations: 34 C.F.R. §§ 668.51– 668.61 (Subpart E) and 668.16(f)
  - FSA Assessments: Assessments Addressing Student Topics – Verification
  - *FSA Handbook, Application & Verification Guide*, Chapters 4 and 5, and Volume 2, Chapter 3

# RESOURCES BY TOP 10 FINDINGS

---

- **Qualified Auditor's Opinion Cited in Audit**
  - Regulations: 34 C.F.R. §§ 668.16(a)–(c), and § 668.171(h)
  - FSA Coach Fundamentals ([fsatraining.ed.gov](https://fsatraining.ed.gov))
  - FSA Assessments
  - *FSA Handbook*, Application and Verification Guide, Volumes 2, 4, and 5
- **Student Credit Balance Deficiencies**
  - Regulations: 34 C.F.R. §§ 668.164(h) and 668.165(b)
  - *FSA Handbook*, Volume 4, Chapter 2

# RESOURCES BY TOP 10 FINDINGS

---

- **Entrance/Exit Counseling Deficiencies**
  - Regulations: 34 C.F.R. § 668.24(c)(1)(v) and § 685.304
  - FSA Coach Fundamentals ([fsatraining.ed.gov](https://fsatraining.ed.gov))
    - Packaging – Direct Loan Entrance Counseling
    - Departure – Exit Loan Counseling
  - *FSA Handbook, Volume 2, Chapter 6*
  - Federal Student Aid ([studentaid.gov](https://studentaid.gov))

# RESOURCES BY TOP 10 FINDINGS

---

- **G5 Expenditures Untimely/Incorrectly Reported**
  - Regulations: 34 C.F.R. §§ 668.164(a), 685.301(c), 690.83
  - Federal Register: Award Year Deadline Dates
    - 2020-2021 dates: Federal Register/Vol. 85, No. 135/Tuesday July 14, 2020
  - *FSA Handbook*, Volume 4, Chapter 2
  - FSA Coach Fundamentals
    - Disbursement – Cash Management and Disbursements

# RESOURCES BY TOP 10 FINDINGS

---

- **Pell Grants Overpayment/Underpayment**
  - Regulation: 34 C.F.R. Part 690
  - *FSA Handbook*, Volume 3, Chapter 3, and Volume 4, Chapter 3
  - FSA Coach Fundamentals
    - Disbursement – Overawards and Overpayments

# RESOURCES BY TOP 10 FINDINGS

---

- **Consumer Information Requirements Not Met**
  - Regulations: 34 C.F.R. Part 99, §§ 668.41 - 668.50 and Appendix A (Subpart D)
  - Higher Education Act of 1965, as amended, Sec. 485
  - *FSA Handbook, Volume 2, Chapters 6 and 7*
  - FSA Training: Search “Consumer Information” ([fsatraining.ed.gov](https://fsatraining.ed.gov))
  - FSA Assessments: Assessments Addressing School Topics – Consumer Information
    - *Consumer Information Disclosures At-A-Glance*
  - Model Notification of Rights under FERPA for Postsecondary Institutions ([www2.ed.gov/policy/gen/guid/fpco/ferpa/ps-officials.html](https://www2.ed.gov/policy/gen/guid/fpco/ferpa/ps-officials.html))



# RESOURCES BY TOP 10 FINDINGS

---

- **Satisfactory Academic Progress Policy Not Adequately Developed/Monitored**
  - Regulations: 34 C.F.R. §§ 668.16(e), 668.32(f), and 668.34
  - FSA Coach Fundamentals ([fsatraining.ed.gov](https://fsatraining.ed.gov))
    - Review – Satisfactory Academic Progress
  - FSA Assessments: Assessments Addressing Student Topics – Satisfactory Academic Progress
  - *FSA Handbook*, Volume 1, Chapter 1, and Volume 2, Chapter 3

# RESOURCES BY TOP 10 FINDINGS

---

- **Lack of Administrative Capability**
  - Regulations: 34 C.F.R. § 668.16
  - *FSA Handbook*, Volume 2, Chapter 3
- **Account Records Inadequate/Not Reconciled**
  - Regulations: 34 C.F.R. § 668.24, §§ 668.161-668.167 (Subpart K), and §§ 668.171 – 668.176 and Appendices (Subpart L), § 674.19, § 675.19, § 676.19, §§ 685.300(b)(5) and 685.301(c), and § 690.83
  - Federal Register: Award Year Deadline Dates
    - 2020-2021 dates: Federal Register/Vol. 85, No. 135/Tuesday July 14, 2020
  - FSA Coach Fundamentals
    - Disbursement – Cash Management and Disbursements
  - *FSA Handbook*, Volume 4 and Volume 6, Chapter 2

# RESOURCES BY TOP 10 FINDINGS

---

- **Crime Awareness Requirements Not Met**
  - Regulations: 34 C.F.R. §§ 668.41 - 668.49 (Subpart D)
  - Higher Education Act of 1965, as amended, Sec. 485
  - *FSA Handbook, Volume 2, Chapters 6 and 7*
  - FSA Training: Search “Campus Security” ([fsatraining.ed.gov](https://fsatraining.ed.gov))
  - FSA Assessments: Assessments Addressing School Topics – Consumer Information
    - *Consumer Information Disclosures At-A-Glance*
  - *The Handbook for Campus Safety and Security Reporting*  
[www2.ed.gov/admins/lead/safety/campus.html](https://www2.ed.gov/admins/lead/safety/campus.html)

# TOP 10 RESOURCES FOR COMPLIANCE SOLUTIONS

---

# TOP 10 RESOURCES

---

- FSA Assessments

<https://fsapartners.ed.gov/knowledge-center/library/resource-type/FSA%20Assessments>

- A Guide to Creating a Policies and Procedures Manual
- Consumer Information/Campus Security
- Fiscal Management
- Institutional Eligibility
- Return of *Title IV* Funds
- Satisfactory Academic Progress
- Verification

# TOP 10 RESOURCES

---

- FSA Training  
[fsatraining.ed.gov](https://fsatraining.ed.gov)
  - Fundamentals Training Series (Coach Fundamentals and Workshops)
  - Learning Tracks
  - Systems and Software Training
  - Quick Take Videos
  - Recorded Webinars

# TOP 10 RESOURCES

---

- *Federal Student Aid (FSA) Handbook*
  - Application and Verification Guide
    - Chapter 4: Verification, Updates, and Corrections
    - Chapter 5: Special Cases
  - Volume 1 (Student Eligibility)
    - Chapter 1: School-Determined Requirements (Satisfactory Academic Progress)
  - Volume 2 (School Eligibility and Operations)
    - Chapter 3: FSA Administrative & Related Requirements (Administrative Capability)
    - Chapter 6: Consumer Information and School Reporting
    - Chapter 7: Record Keeping, Privacy & Electronic Processes
    - Chapter 8: Program Reviews, Sanctions & Closeout

# TOP 10 RESOURCES

---

- *FSA Handbook*
  - Volume 3 (Calculating Awards and Packaging)
    - Chapter 1: Academic Calendar, Payment Periods, & Disbursements
  - Volume 4 (Processing Aid and Managing FSA Funds)
    - Chapter 1: Requesting and Managing FSA Funds
    - Chapter 2: Disbursing FSA Funds
    - Chapter 3: Overawards and Overpayments
    - Chapter 5: Reconciliation in the Pell Grant and Campus-Based Programs
    - Chapter 6: Reconciliation in the Direct Loan Program
    - Appendix A: Accounting Systems
    - Appendix B: A School's Financial Management Systems



# TOP 10 RESOURCES

---

- *FSA Handbook*
  - Volume 5 (Withdrawals and the Return of Title IV Funds)
    - Chapter 1: Withdrawals and the Return of Title IV Funds
    - Chapter 2: The Steps in a Return of Title IV Aid Calculation
    - Appendix: Forms Associated with a Return of Title IV Aid Calculation
  - Volume 6 (The Campus-Based Programs)
    - Chapter 2: The Federal Work-Study Program
  - Appendices A – G

# TOP 10 RESOURCES

---

- Code of Federal Regulations
  - Title 34, Education
    - [ecfr.federalregister.gov/current/title-34](https://ecfr.federalregister.gov/current/title-34) (new beta eCFR site)
      - Subtitle A: Office of the Secretary, Department of Education
        - Part 84 (Drug Free Workplace)
        - Part 86 (Drug and Alcohol Abuse Prevention)
        - Part 99 (Family Education Rights and Privacy)
      - Subtitle B: Regulations of the Offices of the Department of Education, Chapter VI
        - Part 600 (Institutional Eligibility under the *Higher Education Act of 1965*, as amended)
        - Part 668 (Student Assistance General Provisions)
        - Parts 673 – 676 (Campus-Based Provisions)
        - Part 685 (William D. Ford Federal Direct Loan Program)
        - Part 686 (TEACH Grant Program)
        - Part 690 (Federal Pell Grant Program)

# TOP 10 RESOURCES

---

- FSA Worksheets, Schedules, & Tables
  - Student Aid Eligibility, EFC Formula, Pell Grant Payment and Disbursement Schedules, and R2T4 Worksheets

<https://fsapartners.ed.gov/knowledge-center/library/resource-type/Worksheets%2C%20Schedules%2C%20and%20Tables>

Return of *Title IV* (R2T4) on the Web

[cod.ed.gov](https://cod.ed.gov) (Tools)

# TOP 10 RESOURCES

---

- Campus Security

[www2.ed.gov/admins/lead/safety/campus.html](http://www2.ed.gov/admins/lead/safety/campus.html)

[fsatraining.ed.gov](http://fsatraining.ed.gov) (selected topics)

- Entrance/Exit Counseling

[studentaid.gov](http://studentaid.gov)

- Cohort Default Rate Guide

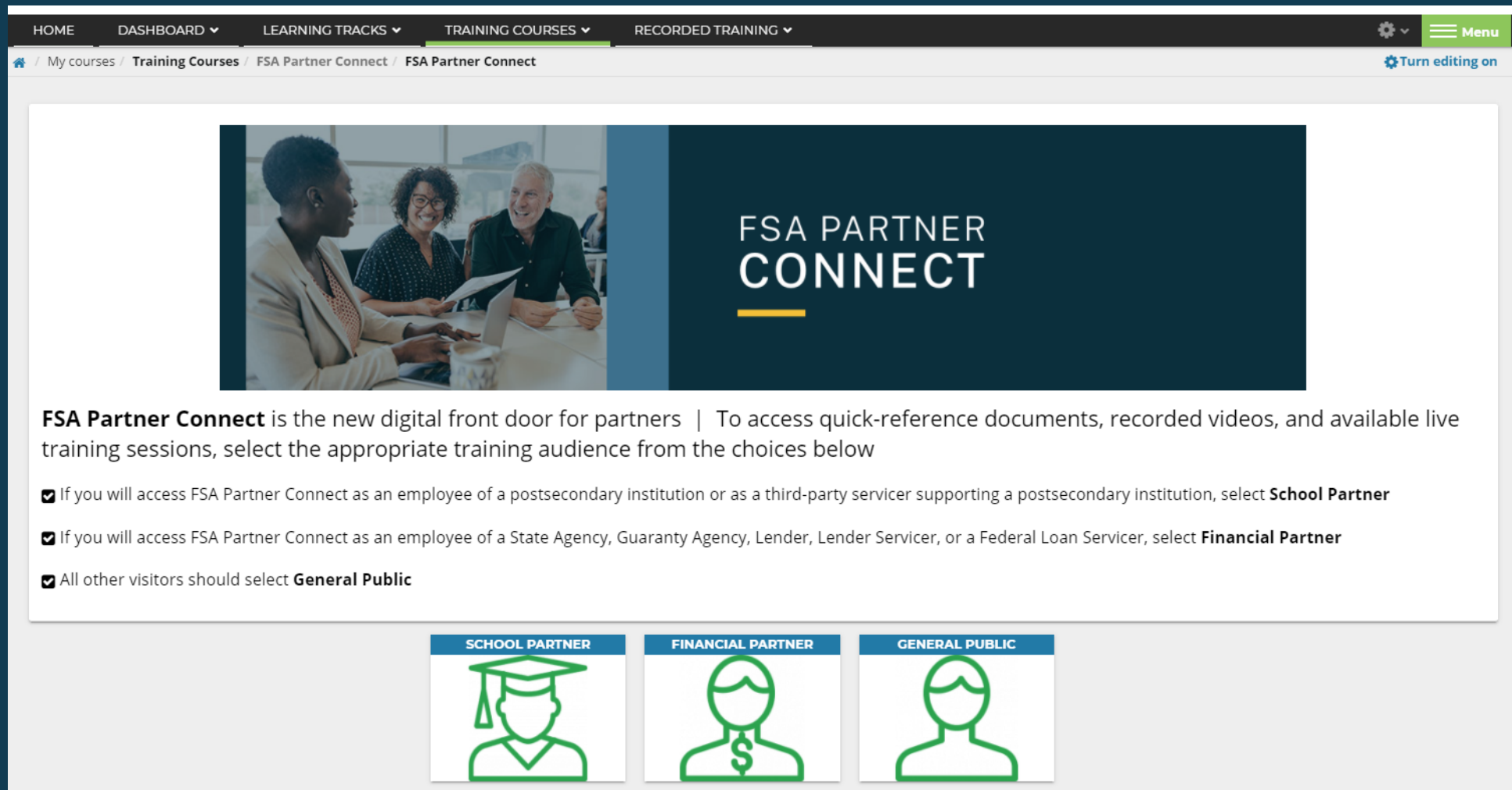
<https://fsapartners.ed.gov/knowledge-center/topics/default-management/cohort-default-rate-guide>

- School Data on StudentAid.gov

[studentaid.gov/data-center/school](http://studentaid.gov/data-center/school)

# FEDERAL STUDENT AID E-TRAINING


<https://fsatraining.ed.gov>



The screenshot shows the FSA Partner Connect website interface. At the top, there is a navigation bar with links for HOME, DASHBOARD, LEARNING TRACKS, TRAINING COURSES, and RECORDED TRAINING. A breadcrumb trail below the navigation bar reads: / My courses / Training Courses / FSA Partner Connect / FSA Partner Connect. The main content area features a large banner image of three people in a meeting, with the text "FSA PARTNER CONNECT" overlaid. Below the banner, a paragraph explains that FSA Partner Connect is the new digital front door for partners and provides instructions on how to select the appropriate training audience. Three selection options are listed, each with a checked checkbox: School Partner, Financial Partner, and General Public. At the bottom, there are three icons representing these roles: a graduation cap for School Partner, a person with a dollar sign for Financial Partner, and a person icon for General Public.

HOME DASHBOARD ▾ LEARNING TRACKS ▾ TRAINING COURSES ▾ RECORDED TRAINING ▾ ⚙️ ☰ Menu




[/](#) [My courses](#) / [Training Courses](#) / [FSA Partner Connect](#) / [FSA Partner Connect](#) ⚙️ Turn editing on



**FSA Partner Connect** is the new digital front door for partners | To access quick-reference documents, recorded videos, and available live training sessions, select the appropriate training audience from the choices below

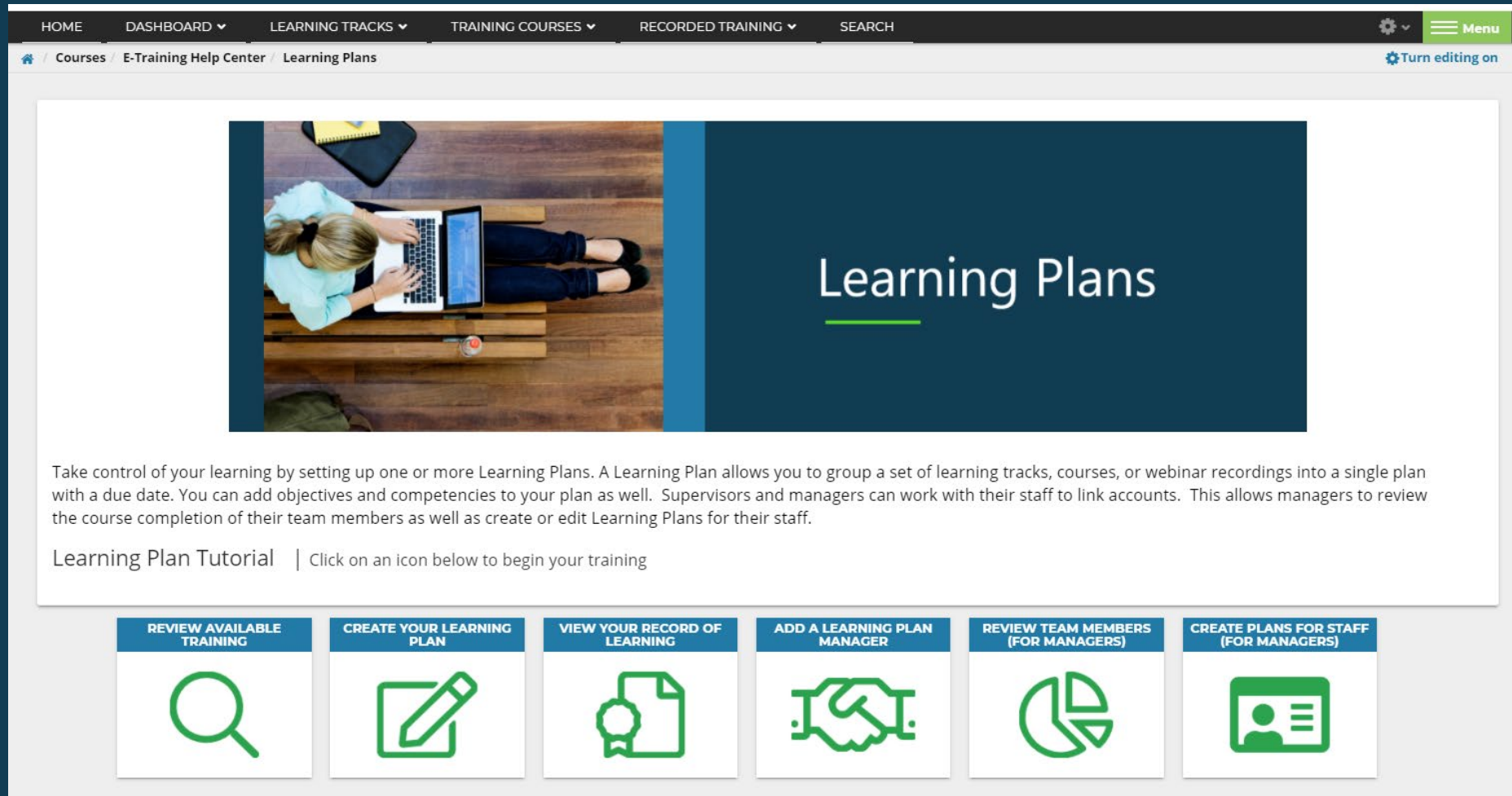
- If you will access FSA Partner Connect as an employee of a postsecondary institution or as a third-party servicer supporting a postsecondary institution, select **School Partner**
- If you will access FSA Partner Connect as an employee of a State Agency, Guaranty Agency, Lender, Lender Servicer, or a Federal Loan Servicer, select **Financial Partner**
- All other visitors should select **General Public**

**SCHOOL PARTNER** **FINANCIAL PARTNER** **GENERAL PUBLIC**



# FEDERAL STUDENT AID E-TRAINING

<https://fsatraining.ed.gov>



The screenshot shows the 'Learning Plans' page on the Federal Student Aid E-Training website. The navigation bar at the top includes links for HOME, DASHBOARD, LEARNING TRACKS, TRAINING COURSES, RECORDED TRAINING, and SEARCH. The breadcrumb trail indicates the user is in Courses > E-Training Help Center > Learning Plans. The main content area features a large banner with an image of a person working on a laptop and the text 'Learning Plans'. Below the banner is a paragraph explaining the purpose of Learning Plans and a 'Learning Plan Tutorial' link. At the bottom, there are six action buttons with icons: 'REVIEW AVAILABLE TRAINING' (magnifying glass), 'CREATE YOUR LEARNING PLAN' (pencil), 'VIEW YOUR RECORD OF LEARNING' (document with ribbon), 'ADD A LEARNING PLAN MANAGER' (handshake), 'REVIEW TEAM MEMBERS (FOR MANAGERS)' (pie chart), and 'CREATE PLANS FOR STAFF (FOR MANAGERS)' (person icon with list).







HOME DASHBOARD ▾ LEARNING TRACKS ▾ TRAINING COURSES ▾ RECORDED TRAINING ▾ SEARCH ⚙️ ☰ Menu

[Home](#) / [Courses](#) / [E-Training Help Center](#) / [Learning Plans](#) ⚙️ Turn editing on

## Learning Plans

Take control of your learning by setting up one or more Learning Plans. A Learning Plan allows you to group a set of learning tracks, courses, or webinar recordings into a single plan with a due date. You can add objectives and competencies to your plan as well. Supervisors and managers can work with their staff to link accounts. This allows managers to review the course completion of their team members as well as create or edit Learning Plans for their staff.

[Learning Plan Tutorial](#) | Click on an icon below to begin your training

- REVIEW AVAILABLE TRAINING 
- CREATE YOUR LEARNING PLAN 
- VIEW YOUR RECORD OF LEARNING 
- ADD A LEARNING PLAN MANAGER 
- REVIEW TEAM MEMBERS (FOR MANAGERS) 
- CREATE PLANS FOR STAFF (FOR MANAGERS) 

# ASK A FED

---

- The AskAFed email box is staffed by FSA training professionals every business day during normal business hours
- AskAFed can help with policy guidance inquiries related to Title IV administration
- The address is [AskAFed@ed.gov](mailto:AskAFed@ed.gov)



# TRAINING FEEDBACK

---

- To ensure quality training, we ask all participants to please fill out an online session evaluation
- At the conclusion of the conference, all attendees will receive an email with a link to an electronic evaluation that we ask you to complete
- This feedback tool informs FSA of areas for improvement in our training presentations and offers an effective process for “listening” to our school partners



# QUESTIONS?

