
Participation, Fiscal Procedures, and Records

The Higher Education Act of 1965, as amended, (HEA) describes the Federal Supplemental Educational Opportunity Grant (FSEOG) Program allocation process in detail; those procedures are not repeated in the regulations. Funds are allocated directly to schools according to the statutory formulas in section 413D of the Act. Schools receive their disbursements in periodic installments either in advance or as reimbursements. The U.S. Department of Education **reallocates** funds to a school in a manner that best carries out the purposes of the FSEOG Program.

PROGRAM PARTICIPATION AGREEMENT

A school that wants to participate in any Federal Student Aid (FSA) Program must sign a Program Participation Agreement with the Secretary. (See *Volume 2 - Institutional Eligibility and Participation* for more general information about the Program Participation Agreement.)

The agreement provides that the school must use FSEOG funds it receives for a program solely for the purposes of the FSEOG Program and that the school must administer the FSEOG Program in accordance with the HEA, and the General Provisions regulations.

Program Participation Agreement cite

34 CFR 676.8

CASH MANAGEMENT

A school must maintain funds received for its administration of the FSEOG Program in accordance with the cash management provisions of 34 CFR 668.163. The provisions are discussed in volume 2.

ALLOCATION OF FUNDS

As discussed in *Volume 4 - Campus-Based Common Provisions*, if a school returns more than 10% of its allocation for a given award year, the Department will reduce the school's allocation for the

Allocation of funds cite

34 CFR 673.4

second succeeding award year by the dollar amount returned. The Department may waive this provision for a specific school if it finds that enforcement would be contrary to the interest of the program. The Department considers enforcement to be contrary to the interest of the program only if the school returned more than 10% of its allocation due to circumstances that are beyond the school's control and that are not expected to recur. The information a school provided on its Fiscal Operations Report and Application to Participate (FISAP) for the 2001-2002 award year will determine the amount of reduction, if any, of the school's allocation for the 2003-2004 award year.

FEDERAL SHARE AND NONFEDERAL SHARE

The federal share of FSEOGs made by a school may not exceed 75% of the total FSEOGs. The school must contribute a nonfederal share (also called "institutional share") of 25%. However, the Department may waive the nonfederal share requirement and may authorize for an award year a federal share of 100% to a school that is designated as an eligible school under 34 CFR parts 606, 607, or 608 (see chart). Your school is considered to have applied for a waiver of the nonfederal share requirement if your school is designated as an eligible school and your school submits a complete FISAP by the established deadline. Such schools will receive a letter from the Department indicating that they have been granted a waiver of the nonfederal share requirement. (For more information, see pages 3-10 to 3-11 of **The Blue Book**, published February 2001.)

The nonfederal share of FSEOGs must be made from the school's own resources. These resources may include:

- institutional scholarships and grants;
- waivers of tuition or fees;
- state scholarships and grants; and
- funds from foundations or other charitable organizations.

The Department has determined that all state scholarships and grants, except for the Leveraging Educational Assistance Partnership (LEAP) (formerly the State Student Incentive Grant [SSIG] Program) and the Special Leveraging Educational Assistance Partnership (SLEAP) (see volume 9) programs are eligible funds that may be used to meet the nonfederal share requirement of FSEOGs. LEAP and SLEAP grants, for this purpose, are defined as the federal LEAP and SLEAP allocation plus the minimum required state matching amount. The remaining state grants are not considered LEAP or SLEAP grants.

Dear Partner Letter CB-01-16, issued in December 2001, provided a chart indicating what percentage of each state's scholarships could be used to provide the nonfederal share of FSEOGs for the 2001-2002 award year. The Department computed the percentages

Federal shares cite

34 CFR 676.21

Waiver of 25% requirement cite

34 CFR 676.21(b)

Part 606 ▶
Developing Hispanic-Serving Institutions Program
Part 607 ▶
Strengthening Institutions Program
American Indian Tribally Controlled Colleges and Universities Program
Alaska Native and Native Hawaiian-Serving Institutions Program
Part 608 ▶
Strengthening Historically Black Colleges and Universities Program

Including state scholarship example

Tina receives a grant of \$675 from a state with a percentage of 96.26. Delgado Broadcasting School multiplies 96.26% by \$675, resulting in \$650, which is the portion of the grant that may be used to meet the nonfederal share requirement for a \$2,600 FSEOG award (\$1,950 is the federal share of the FSEOG award).

in the chart on the basis of information furnished by the respective states regarding expected expenditures for state scholarships and grants for the 2001-2002 award year, and by using the 2001-2002 LEAP and SLEAP allocation data and required matching information. A similar chart for the 2002-2003 award year will be issued in a Dear Partner Letter later in 2002. Each school can apply the appropriate state percentage to the state scholarships and grants its students receive to determine the total amount of state scholarships and grants that may be used to meet the FSEOG nonfederal share requirement.

As a variance from use of the percentages indicated in the chart, if a school has specific knowledge that a state scholarship or grant—irrespective of its name—is considered to be the required state matching portion of a LEAP or SLEAP grant, that scholarship or grant may not be used to meet the FSEOG nonfederal share. Also, if a school has documented knowledge that a state scholarship or grant is not comprised of LEAP or SLEAP monies (federal or state), 100% of the scholarship or grant may be used as the FSEOG nonfederal share.

The 2002-2003 nonfederal share requirement of 25% (unless the school qualifies for a waiver) may be met by one of three methods. In the following discussion of these methods, you should note that for a student to meet the definition of an FSEOG recipient, some portion of the grant awarded the student must have come from the FSEOG federal dollars. Also, by the time the FSEOGs are disbursed (regardless of when in the award period the disbursements are made), the required match must have been accomplished; that is, the school's own resources must have been disbursed before or at the time the federal dollars are disbursed. However, it is important to note that outside resources¹ can be used to match FSEOGs even if the funds are received at a later date, provided that the school has written information about funds that the noninstitutional agency or organization is awarding to the student involved. The written information must be kept on file at the school.

The three methods a school may use to meet its nonfederal share follow:

1. Individual FSEOG recipient basis—the school provides its share to an individual FSEOG recipient together with the federal share; that is, each student's total FSEOG would consist of 25% nonfederal resources and 75% federal dollars for the 2002-2003 award year.
2. Aggregate basis—the school ensures that the sum of all funds awarded to FSEOG recipients in the 2002-2003 award year comprises 75% FSEOG federal funds and 25% nonfederal resources. For example, if a school awards a total of \$60,000 to FSEOG recipients in 2002-2003, it has to ensure that \$45,000 comes from FSEOG federal funds and

1. For example, state scholarships and foundations or other charitable organization funds.

\$15,000 comes from nonfederal resources; if there are 100 FSEOG recipients, the entire \$15,000 nonfederal resource requirement can be met by awarding a total of \$15,000 in nonfederal resources to four FSEOG recipients. However, each FSEOG recipient must receive some FSEOG federal funds.

3. Fund-specific basis—the school establishes an “FSEOG fund” into which it deposits FSEOG federal funds and the required 25% nonfederal share. Awards to FSEOG recipients then are made from the fund.

ADMINISTRATIVE COST ALLOWANCE

Administrative cost allowance cite

34 CFR 673.7

When a school calculates its administrative cost allowance (ACA) for the 2002-2003 award year, the school must include in its calculation the full amount of its FSEOGs—both the 75% federal share and the required 25% nonfederal share. However, a school that chooses to provide more than a 25% institutional share to FSEOG recipients may not include an FSEOG institutional share in excess of 25% in its FISAP or in the calculation of its administrative cost allowance. If the Department has granted a school a waiver of its required nonfederal share, that school may calculate its administrative cost allowance only on the full federal portion. For additional information about the administrative cost allowance, refer to volume 4.

CARRY FORWARD/CARRY BACK

Carry forward/carry back cite

34 CFR 676.18

A school may spend up to 10% of its current year’s FSEOG allocation (initial and supplemental) in the **following** award year (carry forward). If the school carried forward funds to be spent in the following award year, the school must report that amount on the FISAP. For example, if a school carried forward 10% of its Federal Work-Study (FWS) 2001-2002 allocation to be spent in 2002-2003, the school must report this amount on the October 2002 FISAP, in Part V of the Fiscal Operations Report for 2001-2002. Before a school may spend its current year’s allocation, it must spend any funds carried forward from the previous year.

A school is also permitted to spend up to 10% of its current year’s FSEOG allocation (initial and supplemental) for expenses incurred in the prior award year (carry back). The official allocation letter for a specific award period is the school’s authority to exercise this option.

Also, a school is permitted to spend any portion of its current year’s FSEOG allocation (initial and supplemental) to make awards to students for payment periods that begin on or after May 1 of the prior award year but end prior to the start of the current award year (carry back for summer). This carry back authority for summer FSEOG awards is in addition to the authority to carry back 10% of

the current year's FSEOG allocation for use during the previous award year.

TRANSFER OF FUNDS

The HEA prohibits the transfer of FSEOG Program funds to any other program. Since the 1993-1994 award year, schools have been prohibited from transferring FSEOG funds to the FWS Program. However, a school may transfer up to 25% of its FWS allocation and 25% of its Federal Perkins Federal Capital Contribution (FCC) allocation to the FSEOG Program.

A school that transfers funds to the FSEOG Program from FWS during an award year must transfer any unexpended funds **back** to the FWS Program at the end of the award year. The same requirement exists for Perkins Loan FCC funds transferred to the FSEOG Program.

FISCAL PROCEDURES AND RECORDS

In addition to following the fiscal procedures and records requirements mentioned in volume 2 and volume 4, a school must meet the following requirements, which are included in the FSEOG regulations:

- A school must establish and maintain an internal control system of checks and balances that ensures that no office can both authorize FSEOG payments and disburse FSEOG funds to students.
- A school must establish and maintain program and fiscal records that are reconciled at least monthly.
- Each year a school must submit a FISAP and other information the Department requires. The information must be accurate and must be provided on the form and at the time specified by the Department.

Fiscal procedures and records requirements cites

34 CFR 676.19(b)

