

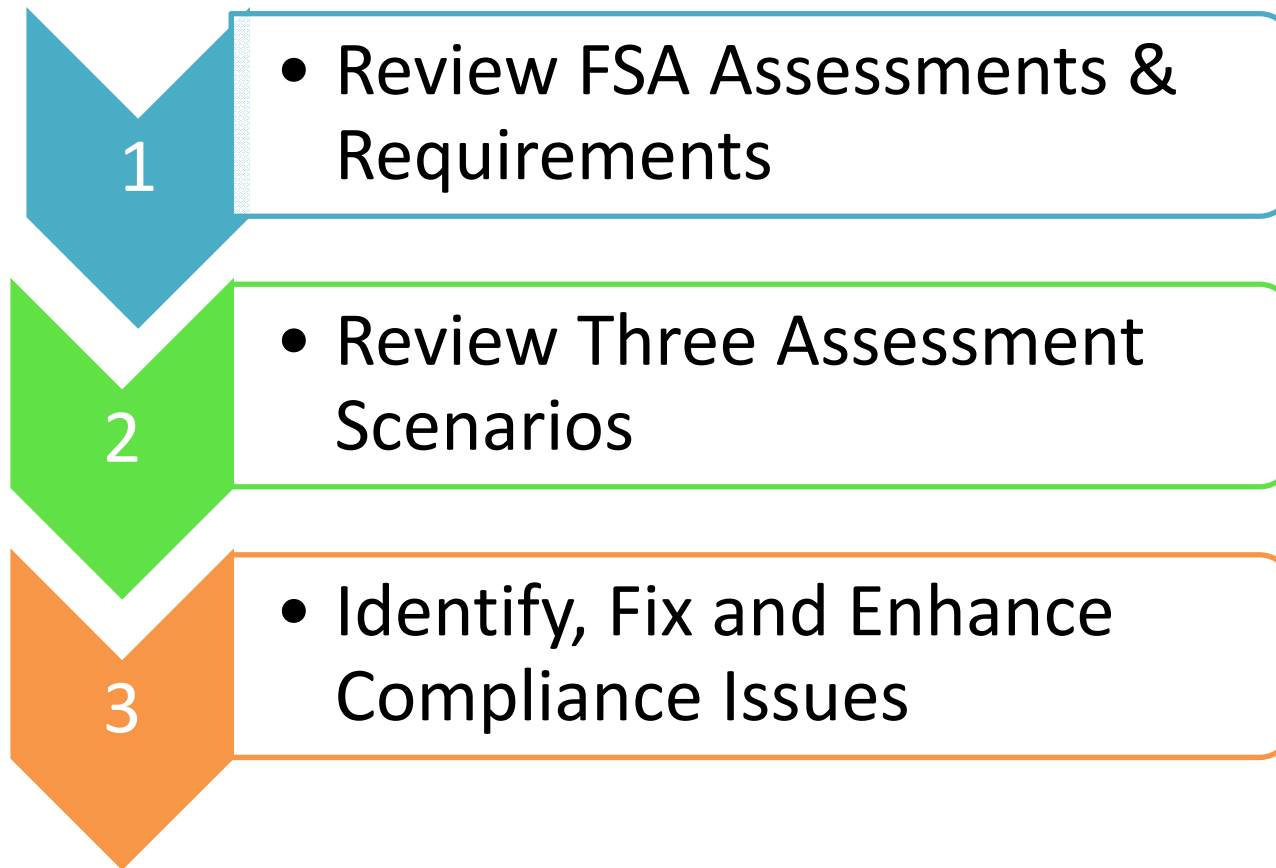
# 2012 QA Session #4

FSA Assessments: Find It, Fix It, Enhance Compliance

Presenter Name | Michael Cagle and Holly Langer-  
Evans, December 10, 2012

# Training Objectives

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# Locate Assessments

## Tools for Schools

Click on this box to access online and computer-based training resources.

### Tools for Schools

- [COD Computer-Based Training](#)
- [Conference Presentations](#)
- [EDEXpress Online Training \(WBT\)](#)
- [Campus-Based Computer-Based Training](#)
- [FSA Assessments](#)
- [FSA COACH \(Web Based Training\)](#)
- [ISIR Analysis Tool](#)
- [Net Price Calculator](#)

IFAP.ED.GOV  
Select Tools for Schools

Select FSA Assessments  
Link

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Joining the QA Program

Tools for Schools

❖ FSA Assessments

ISIR Analysis Tool

Action Plan

Training & Guidance

Conferences & Upcoming Events

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Links

# FSA Assessments

In collaboration with financial aid professionals, Federal Student Aid has designed the FSA Assessments to help schools with compliance and improvement activities. The assessments contain links to applicable laws and regulations. The [FAQ page](#) provides guidance on how to navigate and begin using the FSA Assessments.

## Students

[Student Eligibility](#)

[Satisfactory Academic Progress](#)

[Verification](#)

## Schools

[A Guide to Creating a Policies and Procedures Manual](#)

[Automation](#)

[Consumer Information](#)

[Default Prevention & Management](#)

[Fiscal Management](#)

[Institutional Eligibility](#)

[Return of Title IV Funds](#)

## Campus-Based Programs

[FSEOG](#)

[FWS](#)

### Perkins:

- [Awarding & Disbursement](#)
- [Cancellation](#)
- [Due Diligence](#)
- [Forbearance & Deferment](#)
- [Repayment](#)


## Innovations

# Recommended Assessments

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- Policies & Procedures
  - Verification (Section 3.5)
  - Satisfactory Academic Progress (SAP) (Section 1.3)
  - Consumer Information (Section 3.4)
  - Refunds (Section 9.3)
  - Returns to Title IV and HEA Programs (Section 3.2)
  - Admissions (Sections 2.3 and 3.10)
  - Perkins Loan Selection and Awarding of Students (Section 4.1)
  - FWS Selection and Awarding of Students (Section 5.1)
  - FSEOG Selection and Awarding of Students (Section 6.1)

## 2012 Timeline for the FSA Assessments



<b>January - June, 2013</b>	Continue completion of 2012-2013 assessments or activities. Keep copies of all Action Plans in QA file.
<b>April, 2013</b>	Report on the QA Annual Survey which assessments or activities you will complete for 2013-2014
<b>March – June, 2013</b>	Establish Teams to begin completion of the assessments or activities for the 2013-2014 award year
<b>July, 2012 – June, 2013</b>	Complete Assessments for 2012-2013, and any Action Plans

# Assessment Design

## VERIFICATION

### ➤ Page Layout

➤ Links

➤ Action Plan

➤ Activity Bar

## Verification

This assessment provides you with an opportunity to review procedures regarding verification. Additional links are provided to assist you in the evaluation of your Verification Process. Click on the following [Verification Regulations at a Glance](#) as it will assist you in understanding the verification requirements.

If you identify areas requiring a corrective action, we recommend that you complete an [Action Plan](#).

### Activity Bar:

[Verification Activity 1: Resolving Conflicting Data](#)

[Verification Activity 2: Dependency Overrides & Professional Judgment](#)

**Additional Links:** [2012-13 FSA Handbook \(AVG\), Chapter 4](#); [Program Integrity Link \(Verification\)](#); [2012-13 Sample Verification Worksheets](#)

Please note the regulatory citations are referenced in the first column of the assessment. To link to any of the regulatory references, click on the link in the regulatory link column and scroll down to the applicable section.

**For regulations that are effective on July 1, 2012, select the following link:** [2012-13 Verification Regulations](#)

Verification <a href="#">Subpart E-Verification of Student Aid Application Information (668.51 through 668.61)</a>	Regulatory Link(s)	Activity
<b>General</b> 34 CFR 668.51	<a href="#">34 CFR 668.51</a>	
<b>Definitions</b> 34 CFR 668.52	<a href="#">34 CFR 668.52</a>	
<b>Policies and Procedures</b> 34 CFR 668.53	<a href="#">34 CFR 668.53</a>	
<b>Selection of Applicant's FAFSA information for Verification</b> 34 CFR 668.54	<a href="#">34 CFR 668.54</a> <a href="#">34 CFR 668.55</a>	<a href="#">Verification Activity 1: Resolving Conflicting Data</a>
<b>Updating Information</b> 34 CFR 668.55	<a href="#">34 CFR 668.56</a> <a href="#">34 CFR 668.57</a>	
<b>Items to be Verified and Acceptable Documentation:</b> 34 CFR 668.56 and 34 CFR 668.57; <a href="#">DCL GEN 11-13</a> ; <a href="#">DCL GEN 12-07</a> .	<a href="#">34 CFR 668.58</a> <a href="#">34 CFR 668.59</a>	
Some helpful sites to assist with Verification include: <a href="http://www.federalreserve.gov/releases/h10/update">www.federalreserve.gov/releases/h10/update</a> (the preferred site for foreign income conversion to US dollars)	<a href="#">34 CFR 668.60</a>	
<a href="#">Who should file a 1040?</a>	<a href="#">34 CFR 668.61</a>	
<a href="#">Health &amp; Human Services Poverty Guidelines</a>	<a href="#">2012-13 Verification Regulations</a>	
<b>2011-12 IRS FORMS:</b> <a href="#">IRS 1040</a> , <a href="#">IRS 1040A</a> , <a href="#">IRS 1040EZ</a> , <a href="#">IRS Form 2555 (Foreign Earned Income)</a> , <a href="#">IRS Form 2555EZ</a> and <a href="#">2011 W-2 (For Informational Purposes Only)</a>		
<b>Verification ISIR/1040 Comparison charts:</b> <a href="#">2010-11</a> , <a href="#">2011-12</a> and <a href="#">2012-2013</a> (Includes IRS Transcript comparison)		

# Assessment Design

## VERIFICATION

### ➤ Page Layout

- Topic
- Regulation
- Activity

<b>Interim Disbursements</b> 34 CFR 668.58	
<b>Consequences of Change in an Applicant's FAFSA Information</b> 34 CFR 668.59	
<b>Deadlines for Submitting Documentation and the Consequences of Failing to Provide Documentation</b> , 34 CFR 668.60, 34 CFR 668.60(b)(1)(i), 34 CFR 668.58(a)(2) and 34 CFR 668.57	
<b>Recovery of Funds from Interim Disbursements</b> 34 CFR 668.61, 34 CFR 668.9(a)(2); <a href="#">DCL GEN 98-14 July 1998</a> and 34 CFR 668.58(a)(2)(ii)(A)	
<b>Professional Judgment and Dependency Overrides</b> 34 CFR 668.53(c); <a href="#">479A(a)</a> ; <a href="#">480(d)(1)(i)</a> and <a href="#">DCL GEN-03-07</a> ; <a href="#">DCL GEN-09-04</a> ; <a href="#">DCL GEN-09-05</a> ; <a href="#">DCL GEN-11-04</a> ; <a href="#">DCL GEN-11-15</a>	<a href="#">Verification Activity 2: Dependency Overrides &amp; Professional Judgment</a>

Last Updated June 2012



# Access Action Plan

## Access Action Plan

### Action Plan

### Quality Assurance Program

An Action Plan assists with the evaluation and implementation of a corrective action you may have identified while using the FSA Assessments. Although an Action Plan is not required, it is recommended that your school has a process to resolve any compliance issue identified.

Click the download button below to save a copy of the Action Plan on your computer. This is a Word document and can be personalized to your needs.

[Download a blank  
Action Plan](#) 

## Download or Save

<b>What assessment is this enhancement item related to?</b>
<b>Action Item:</b> (Provide a detailed description of the policy, procedure or system that needs to be improved)
<b>Action Plan:</b> (Provide a detailed description of your plan of action to improve the above enhancement item)
<b>Offices that need to be involved:</b>

## Find

- Identify an Assessment
- Complete the Assessment

## Fix

- Research Area of Improvement
- Develop Action Plan

## Enhance

- Create & Implement Action Plan
- Review Annually

## Identify FSA Assessment

### Scenario 1:



### 2012-13 award year

- The school was asked to provide their verification policies and procedures in preparation for a program review.
- The school's QA verification criteria, acceptable documentation and QA exemptions are not in the schools policies and procedures.

# Complete Assessment

## Scenario 1



- The school developed four verification criteria for the 2012-2013 award year. The school provides all staff members a copy of the criteria and that is the only documentation of the criteria at the school.
- Staff members are confused about what verification exemptions QA schools have.

## A Guide to Creating A Policies & Procedures Manual

Part  
3.5b

Verification (For Participating Quality Assurance Schools)

This section is required:  
[668.53](#)

For Schools Participating in the Quality Assurance (QA) Program  
(Schools participating in the QA Program must have a signed addendum to their Program Participation Agreement (PPA)).

### This section includes:

Procedures outlining the requirements for Verification as required by Title IV Regulations.

### Written Verification Policies and Procedures:

Your school must have written policies and procedures on the following verification issues:

- Identify Institutional Verification Selection Criteria.
- Identify Items you will verify and what is your acceptable Documentation.
- Identify deadlines the school established for submitting the documentation.
- List verification Exemptions
- Process for Updating Information
- Consequences of Change in an applicant data.
- Process for Interim Disbursements
- Conflicting Data
- Standard procedures for referring overpayment cases to the Department [668.16\(g\)](#).



Enhance

- Implement Action Plan
- Review Annually

- Create An Action Plan
- Train Staff
- Follow through on Corrective Action

# Action Plan

<p><b>What assessment is this enhancement item related to?</b> Verification/Policies &amp; Procedures</p>							
<p><b>Action Item:</b> (Provide a detailed description of the policy, procedure or system that needs to be improved)</p> <p><i>Revise Policies &amp; Procedures to include QA verification criteria, acceptable documentation and QA exemptions</i></p>							
<p><b>Action Plan:</b> (Provide a detailed description of your plan of action to improve the above enhancement item)</p> <p><i>Update verification policies &amp; procedures to include a description of all verification criteria. Update the criteria in the policies &amp; procedures each year if the criteria is enhanced or changed in subsequent award years. Include a reference to the QA verification exemptions in the verification policies and procedures with a brief description of each exemption. Include the acceptable documentation requirements in the policies &amp; procedures. Provide training to ensure all staff understand the QA verification exemptions, acceptable documentation, as well as the verification criteria the school has developed to select students for verification.</i></p>							
<p><b>Offices that need to be involved:</b></p> <p><i>Financial Aid Office</i></p>							
<p><b>Lead Persons to Coordinate Action Plan:</b></p> <table> <tr> <td>Name: Find It</td> <td>Name: Fix It</td> </tr> <tr> <td>Title: Financial Aid Coordinator</td> <td>Title: Fiscal Office</td> </tr> <tr> <td>Phone Number: (999)999-9999</td> <td>Phone Number: (999)999-9999</td> </tr> </table>		Name: Find It	Name: Fix It	Title: Financial Aid Coordinator	Title: Fiscal Office	Phone Number: (999)999-9999	Phone Number: (999)999-9999
Name: Find It	Name: Fix It						
Title: Financial Aid Coordinator	Title: Fiscal Office						
Phone Number: (999)999-9999	Phone Number: (999)999-9999						

**Near-Term Enhancement?**  Yes  No

**Long-Term Enhancement?**  Yes  No

Start Date (mm/dd/yy): 8/15/2012

Anticipated Completion Date: 10/30/2012

Actual Completion Date: 10/15/2012

**After implementation, explain the final results:**

*The revised policy has been updated, published and shared with staff. Training has been provided to all staff so they understand the QA exemptions, acceptable documentation, as well as the QA verification criteria used by the school.*

**Did you update your Policies and Procedures Manual to reflect changes made as a result of the action plan implemented?**

1.  Yes  No
2. Section Updated: Verification Section
3. Date Policies and Procedures Manual Updated (10/31/2012)

**Comments:**

*We recommend that your school annually review all action plans implemented by the school.*

# Potential Findings

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Verification Violations

Verification Policy Not Documented

Verification Policy Inadequate



## Identify FSA Assessment Scenario 2



- **Policies & Procedures**
- **Verification Assessment**

## Scenario 2012-13 award year

- When reviewing conflicting data procedures, the Financial Aid Office determined that the Fiscal Office was receiving outside scholarships and posting the aid to the student accounts without notifying the Financial Aid Office.

# Complete an Assessment

## Scenario 2



- When reviewing conflicting data procedures, the Financial Aid Office determined that the Fiscal Office was receiving outside scholarships and posting the aid to the student accounts without notifying the Financial Aid Office.

## Verification Assessment – Activity 1

### RESOLVING CONFLICTING DATA

2011-12 FSA Handbook, School Eligibility & Operations, Chapter 3, 2012-13 FSA Handbook, AVG, Chapter 5, 668.54(a)(2), 668.16(b)(3), 668.16(f)

#### **What is Conflicting Data under the regulations?**

668.54(a)(2)— If an institution has reason to believe that an applicant's FAFSA information is inaccurate, it must verify the accuracy of that information.

668.16(b)(3)—An institution must communicate to the individual designated to be responsible for administering Title IV, HEA programs, all the information received by any institutional office that bears on a student's eligibility for Title IV, HEA program assistance.

668.16 (f)—An institution must develop and apply an adequate system to identify and resolve discrepancies in the information that the institution receives from different sources with respect to a student's application for financial aid under Title IV, HEA programs. In determining whether the institution's system is adequate, the Secretary considers whether the institution obtains and reviews:



Enhance

- Implement Action Plan
- Update Annually

- Create An Action Plan
- Train Staff
- Follow through on Corrective Action

# Action Plan

<p><b>What assessment is this enhancement item related to?</b> Verification, A Guide to Creating a Policies &amp; Procedures Manual</p>						
<p><b>Action Item:</b> (Provide a detailed description of the policy, procedure or system that needs to be improved)</p> <p><i>Include process to ensure that all outside scholarship aid that is delivered to the school for a student is accounted for by the financial aid office so it can be included in the student's award package.</i></p>						
<p><b>Action Plan:</b> (Provide a detailed description of your plan of action to improve the above enhancement item)</p> <p><i>Update Conflicting data policies &amp; procedures to ensure that the school coordinates aid received on behalf of the student by various offices on campus. Specifically, the school will develop procedures to ensure that the Fiscal Office notifies the Financial Aid Office of any outside scholarships received for a student before the scholarship is posted to the student's account. The financial aid office will request a list of all outside aid that the Fiscal Office has received and posted to any student's account. The financial aid office will include that aid as part of the student's financial aid package and resolve any over awards as necessary.</i></p>						
<p><b>Offices that need to be involved:</b> Financial Aid Office, Fiscal Office</p>						
<p><b>Lead Persons to Coordinate Action Plan:</b></p> <table> <tr> <td>Name: Find It</td> <td>Name: Fix It</td> </tr> <tr> <td>Title: Financial Aid Coordinator</td> <td>Title: Fiscal Officer</td> </tr> <tr> <td>Phone Number: (999)999-9999</td> <td>Phone Number: (999)999-9999</td> </tr> </table>	Name: Find It	Name: Fix It	Title: Financial Aid Coordinator	Title: Fiscal Officer	Phone Number: (999)999-9999	Phone Number: (999)999-9999
Name: Find It	Name: Fix It					
Title: Financial Aid Coordinator	Title: Fiscal Officer					
Phone Number: (999)999-9999	Phone Number: (999)999-9999					
<p><b>Near-Term Enhancement?</b> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>						
<p><b>Long-Term Enhancement?</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>						

Start Date (mm/dd/yy): 8/15/2012  
Anticipated Completion Date: 10/30/2012  
Actual Completion Date: 10/15/2012

**After implementation, explain the final results:**

*The revised policy & procedure has been updated, published and shared with staff. The school received a listing of outside scholarships received by the Fiscal Office and included those scholarships as part of the student's financial aid package. Three students were over awarded and over budget. As a result, the school reduced the amount of loan funds those students could receive and notified each student with a new award letter and updated the loan information in COD.*

**Did you update your Policies and Procedures Manual to reflect changes made as a result of the action plan implemented?**

1.  **Yes**  No
2. Section Updated: Conflicting Data Section
3. Date Policies and Procedures Manual Updated (10/31/2012)

**Comments:**

*We recommend that your school annually review all action plans implemented by the school.*

Last updated 6/29/2011

# Potential Findings

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Overaward: Financial Need Exceeded

Conflicting Data

Policies & Procedures Not Developed

Lack of Administrative Capability

## Identify FSA Assessment Scenario 3



### 2012-13 award year

- The school checks SAP annually. For students who successfully appeal and are placed on probation under the new SAP regulations, the school allows the student to receive aid during their probation until the next time they check SAP (an entire year).

# Assessment Design

## Satisfactory Academic Progress

### ➤ Page Layout

➤ Links

➤ Action Plan

➤ Activity Bar

➤ Topic

➤ Regulation

➤ Activity

### Satisfactory Academic Progress

This assessment provides you with an opportunity to review and evaluate your procedures regarding Satisfactory Academic Progress (SAP). If you identify areas requiring corrective action, we recommend that you complete an [Action Plan](#).

#### Activity Bar:

[SAP Activity 1: SAP File Review Worksheet](#)

#### Additional Links:

[2011-12 FSA Handbook, Student Eligibility, Chapter 1](#); [2011-12 FSA Handbook, School Eligibility & Operations, Chapter 3; Program Integrity Questions & Answers - Satisfactory Academic Progress](#)

Please note the regulatory citations are referenced in the first column of the assessment. To link to any of the regulatory references, click on the link in the regulatory link column and scroll down to the applicable section.

Satisfactory Academic Progress	Regulatory Link(s)	Activity
<b>Administrative Capability</b> 34 CFR 668.16(e)	<a href="#">34 CFR 668.2</a>	<a href="#">A Guide To Creating A Policies and Procedures Manual, Introduction and Section 1</a>
<b>Student Eligibility</b> 34 CFR 668.32(f)	<a href="#">34 CFR 668.16</a> <a href="#">34 CFR 668.32</a> <a href="#">34 CFR 668.34</a>	
<b>Satisfactory Academic Progress Policy</b> 34 CFR 668.34		
<b>SAP Policy required elements</b> <ul style="list-style-type: none"> <li>The policy is at least as strict as the policy the institution applies to a student who is not receiving assistance under the title IV, HEA programs</li> <li>The policy provides for consistent application of standards to all students within categories of students, e.g., fulltime, part-time, undergraduate, and graduate students, and educational programs established by the institution</li> <li>GPA or other comparable assessment measured against a norm</li> <li>The pace at which a student must progress to complete the program within the maximum timeframe</li> <li>Process for Incompletes, Withdrawals, Repetitions, and transfer of credit from other schools</li> <li>Frequency of SAP evaluation</li> <li>SAP Warning (applicable only if school's policy places student on <del>Financial Aid Warning</del>)</li> <li>SAP Probation (applicable only if school's policy places student on <del>Financial Aid Probation</del>)</li> <li>SAP Appeal (applicable only if school's policy places student on Financial Aid Probation. Student must appeal before probation granted.)</li> <li>Process for Schools that evaluate SAP at the end of each payment period</li> <li>Process for Schools that evaluate SAP annually or less frequently than the end of each payment period</li> <li>SAP Notifications</li> </ul>		<a href="#">SAP Activity 1: SAP File Review Worksheet</a>

Last Updated May 2012



# Complete an Assessment

## Scenario 3

### Program Integrity Link



Fix

- The school checks SAP annually. For students who successfully appeal and are placed on probation under the new SAP regulations, the school allows the student to receive aid during their probation until the next time they check SAP (an entire year).

PROB-Q1: Under what circumstances would a student be placed on SAP probation?

PROB-A1: A student who fails SAP must successfully appeal to be placed on probation. Probation may not be given automatically. At the end of one payment period on probation, the student must make SAP or must be meeting the requirements of the academic plan. [Guidance issued 8/26/2011]

PROB-Q2: If, after one payment period on probation, the student is still not making SAP, can the student be automatically placed on an academic plan, or must the student appeal again?

PROB-A2: The student would have to successfully appeal to be placed on a plan. The institution would need information about why the student failed to make SAP at the end of the probation payment period, including what had changed that caused the student to not make SAP during the probationary payment period and why the student will be able to meet SAP on the terms of the academic plan. The student is on probation during the first payment period of the academic plan. [Guidance issued 8/26/2011; REV 04/13/2012]  
new

### 34 CFR 668.34

(ii) A student on financial aid probation may receive title IV, HEA program funds for one payment period. While a student is on financial aid probation, the institution may require the student to fulfill specific terms and conditions such as taking a reduced course load or enrolling in specific courses. At the end of one payment period on financial aid probation, the student must meet the institution's satisfactory academic progress standards or meet the requirements of the academic plan developed by the institution and the student to qualify for further title IV, HEA program funds;

# Complete an Assessment

## Scenario 3 - Continued

### Policies and Procedures

#### Financial Aid Warning and Financial Aid Probation:

- If the school places students on financial aid warning, or on financial aid probation, the policy must describe these statuses and that a student on financial aid warning may continue to receive assistance under the Title IV, HEA programs for one payment period despite a determination that the student is not making SAP. Financial Aid Warning Status may be assigned without an appeal or other action by the student. The policy may also include, for a student on Financial Aid Probation, that they may receive Title IV, HEA program funds for one payment period. Further, while a student is on financial aid probation, the school may choose to require the student to fulfill specific terms and conditions such as taking a reduced course load or enrolling in specific courses. At the end of one payment period on financial aid probation, the policy must require that the student meet the school's SAP standards or meet



Enhance

- Implement Action Plan
- Review Annually

- Create An Action Plan
- Train Staff
- Follow through on Corrective Action

# Action Plan

<b>What assessment is this enhancement item related to?</b> SAP
<b>Action Item:</b> (Provide a detailed description of the policy, procedure or system that needs to be improved)  <i>For students that appeal and are placed on probation, the school will update procedures to ensure any student placed on probation must be reviewed at the end of one payment period to ensure the student met the terms of the probation. The school will review all students placed on probation during the 2011-12 and 2012-13 award years and make sure each student met the terms of their probation after the first payment period.</i>
<b>Action Plan:</b> (Provide a detailed description of your plan of action to improve the above enhancement item)  <i>Update SAP policies &amp; procedures to ensure that the school reviews any student placed on probation after one payment period to ensure those students met the terms of their probationary period. The financial aid office will review all students placed on probation during the 2011-12 and 2012-13 award years to ensure all students on probation met the terms of their probationary period after one payment period. For any student that did not meet the terms, the school will notify those students and adjust all ineligible aid disbursed and repay any ineligible disbursement to the applicable Title IV program. The school will designate a staff member to review all students placed on probation at the end of one payment period in the future so this issue does not recur. All staff will be trained about this new procedure. All current students will be notified of this revised SAP Policy.</i>
<b>Offices that need to be involved:</b> <i>Financial Aid Office, Registrar, Fiscal Office</i>

**Lead Persons to Coordinate Action Plan:**

Name: Find It	Name: Fix It
Title: Financial Aid Coordinator	Title: Registrar
Phone Number: (999)999-9999	Phone Number: (999)999-9999

**Near-Term Enhancement?**  Yes  No

**Long-Term Enhancement?**  Yes  No

Start Date (mm/dd/yy): 8/15/2012  
Anticipated Completion Date: 10/30/2012  
Actual Completion Date: 10/15/2012

**After implementation, explain the final results:**

*The revised policy & procedure has been updated, published and shared with staff and students. All staff were trained to follow this procedure and one staff member will now be checking SAP at the end of each payment period for students placed on probation. After the school reviewed all students on probation during the 2011-12 and 2012-13 award years, the school found only one student who did not meet the terms of his probation after one payment period. The student withdrew at the end of the first payment period and no additional refund was due.*

**Did you update your Policies and Procedures Manual to reflect changes made as a result of the**

Last updated 6/29/2011

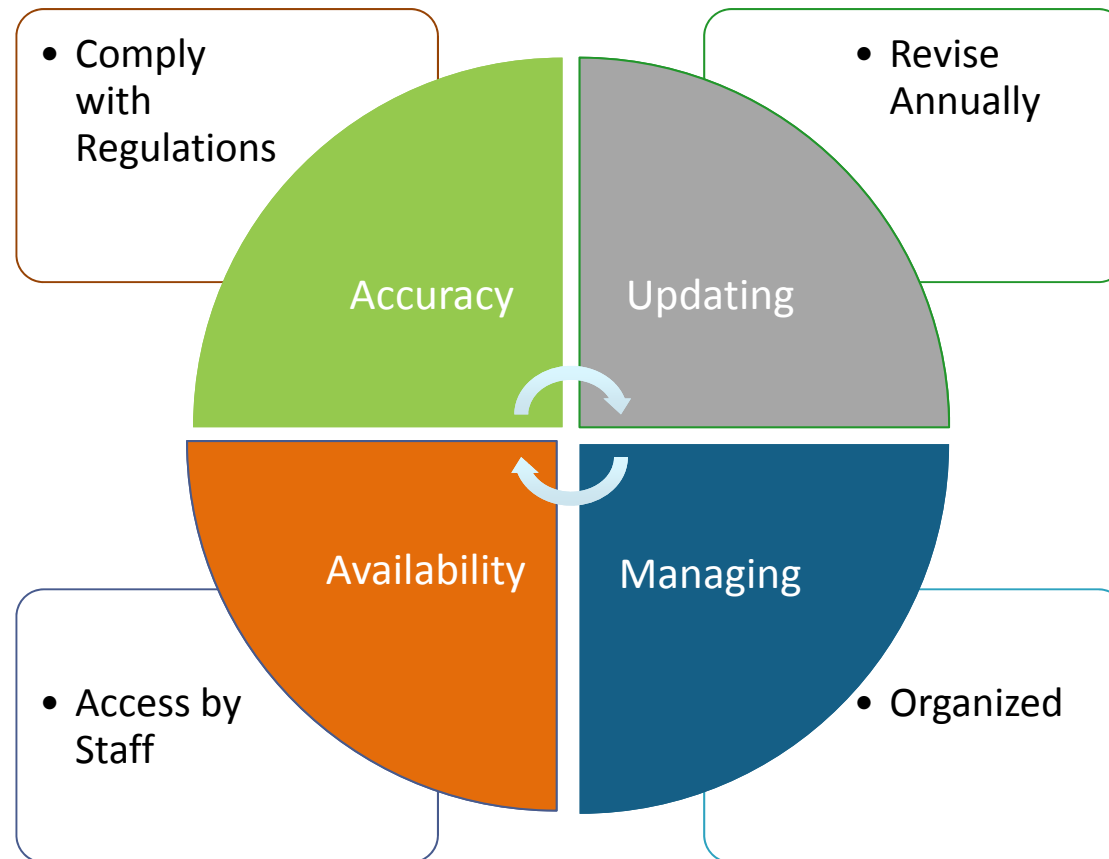
# Potential Findings

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Satisfactory Academic Progress Policy  
Not Adequately Developed

Satisfactory Academic Progress Policy  
Not Monitored

# Importance of a Manual



# Live Demonstration

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Find

- IFAP.ED.GOV

Fix

- Select and Complete and Assessment

Enhance

- Complete and Implement Action Plan, Review Annually

# Violation: LOL 10-31-12



# Contact Information

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We appreciate your feedback and comments:

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