



INSTITUTE FOR PROFESSIONAL DEVELOPMENT

Ensuring Title IV Compliance

2005 CAAHE Conference



Compliance “Hot Spots”

INSTITUTE FOR PROFESSIONAL DEVELOPMENT

- Cash Management
- Awarding
- Administrative Capability
- Current Program Participation Agreement
- Written Policies and Procedures
- Consumer Information



Cash Management

Compliance “Hot Spots”

INSTITUTE FOR PROFESSIONAL DEVELOPMENT

- Disbursements
 - Three Day Rule
 - Eligibility (Satisfactory Academic Progress and Attendance)

- Credit Balance Returns
 - Within 14 days
 - End of loan period/award period

- Return of Funds
 - Leave of Absence



Awarding Compliance “Hot Spots”

INSTITUTE FOR PROFESSIONAL DEVELOPMENT

- Academic Year Definitions
- Appropriate Supporting Documentation for Professional Judgment
- Adequate Documentation for Verification
- Loans
 - Over/Under Awards
 - Successful Completion /Satisfactory Academic Progress
- Pell Grants
 - Formula
 - Crossover



Administrative Capability

Compliance “Hot Spots”

INSTITUTE FOR PROFESSIONAL DEVELOPMENT

- Staffing Level

- Administrative Burden

 - Processes

 - Systems

Lack of financial resources is **NOT**
a valid defense.



Policies and Procedures

Compliance “Hot Spots”

INSTITUTE FOR PROFESSIONAL DEVELOPMENT

 Documented

 Available to Staff

 Consistently Administered



Consumer Information Compliance “Hot Spots”

INSTITUTE FOR PROFESSIONAL DEVELOPMENT

● Current

● Available

● Sent to ED within required
timeframes



Current Participation Agreement Compliance “Hot Spots”

INSTITUTE FOR PROFESSIONAL DEVELOPMENT

 Programs

 Locations

Note: IPD must be reflected as a Third Party
Servicer



Resolution of Compliance Concern

INSTITUTE FOR PROFESSIONAL DEVELOPMENT

● Determine Scope

● Evaluate Impact

● Resolve the Issue

Lack of resources is NOT a valid defense.



Resources to Evaluate Compliance

INSTITUTE FOR PROFESSIONAL DEVELOPMENT

● Self Evaluation

- NASFAA Guide

● Internal Audit

● Third Party Servicer (IPD) Review

● Consultant Review

- Scope of Services
- Contract Terms



Resources to Evaluate Compliance (continued)

INSTITUTE FOR PROFESSIONAL DEVELOPMENT

External Auditor

Department of Education

Caution!



Strategies to Ensure Compliance

INSTITUTE FOR PROFESSIONAL DEVELOPMENT

● Qualified Staff

● Training

● Continued Self Monitoring

● Appropriate Internal Controls



Compliance Regulatory References

INSTITUTE FOR PROFESSIONAL DEVELOPMENT

● Compliance Audits

● 34 CFR 668.23

● Conflicting Information

● 34 CFR 668.16(f)

● Consumer Information

● 34 CFR 668.41

● Disbursement of awards, notification

● 34 CFR 668.42(c)(3)



Compliance Regulatory References (continued)

INSTITUTE FOR PROFESSIONAL DEVELOPMENT

● Financial Aid History

● 34CFR 668.167

● GEN-01-09

● GEN-00-12

● NSLDS

● 34 CFR 668.19

● Program Participation Agreement

● 34 CFR 600.10

● 34 CFR 600.20

● 34 CFR 600.21



Compliance Regulatory References (continued)

INSTITUTE FOR PROFESSIONAL DEVELOPMENT

● Record Retention

● 34 CFR 668.24

● Return of Title IV Funds

● 34 CFR 668.22

● GEN-04-03

● GEN-00-24

● Student Eligibility

● 34 CFR 668.32

● GEN-02-11



Compliance Regulatory References (continued)

INSTITUTE FOR PROFESSIONAL DEVELOPMENT

☉ Satisfactory Academic Progress

☉ 34 CFR 668.34

☉ Verification

☉ 34 CFR 668.54 to 668.60

☉ Authorizations

☉ 34 CFR 668.165

☉ Late Disbursements

☉ 34 CFR 668.164(g)



Compliance Regulatory References (continued)

INSTITUTE FOR PROFESSIONAL DEVELOPMENT

● Cash Management

● 34 CFR 668.164

● FERPA

● 34 CFR 99

● NASFAA Policies & Procedures Tools

● www.nasfaa.org

● Self-Evaluation Guide

● www.nasfaa.org