



# Administrative Capability: A Campus Wide Compliance Requirement

National Association of Student  
Financial Aid Administrators

The following is a presentation  
prepared for

**SWASFAA**

Tulsa, OK  
November 16-18, 2011

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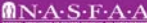
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National Association of Student  
Financial Aid Administrators

**Administrative Capability:  
A Campus Wide  
Compliance Requirement**

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**Administrative Capability: Introduction**

- Coordination and development of campus-wide activities influenced by participation in the Title IV programs
- Campus-wide information-sharing requirements; and
- Ways to promote the importance of administrative capability throughout the institution

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# Administrative Capability: A Campus Wide Compliance Requirement

## Adequate Resources

- Designation of a capable individual to administer Title IV programs and coordinate with other programs of assistance
- Communication of all institutional information having a bearing on a student's eligibility for Title IV aid

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## Adequate Resources

- Adequate counseling of prospective and enrolled students who apply for financial aid
- Adequate number of qualified staff to administer Title IV programs in which school participates

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## Adequate Resources

- Adequate number of qualified staff to administer required Department of Education electronic processes and perform day-to-day duties associated with those processes
- No evidence of findings or significant problems indicating school is incapable of properly administering Title IV programs

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# Administrative Capability: A Campus Wide Compliance Requirement

## Adequate Resources

- Demonstration of level of competency, integrity, and ethical behavior
- Appearance of being otherwise capable of administering Title IV programs

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## Compliance & Evaluation

Methods financial aid office can use to assess office operations quality and results:

- Student feedback from questionnaires and/or interviews
- Financial aid office staff meetings to get feedback and ideas
- Feedback from staff from other institutional offices that regularly deal with students and/or financial aid office
- Analysis of reports
- Self-evaluation
  - NASFAA's on-line *Self-Evaluation Guide for Institutional Participation and in Title IV and Other Federal Programs*

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## Compliance & Evaluation

Periodically supplement self-evaluation with evaluation by objective third party

- Internal auditor or similar employee
- Peer review and evaluation
  - NASFAA's *Standards of Excellence Peer Review Program* (see NASFAA website for additional information)

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# Administrative Capability: A Campus Wide Compliance Requirement

## Adequate Staffing – Qualitative Factors

Qualitative factors may include:

- Administrative requirements for financial aid programs
- Demographics
- Service delivery time lines
- Distribution of application materials and consumer information
- Customer service expectations
- Automation and technology utilization
- Financial aid counseling
- Satisfactory academic progress advising
- Refund and Title IV repayment estimates for students who drop classes or completely withdraw

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## Adequate Staffing – Quantitative Factors

Some quantitative factors are:

- Number of financial aid programs
- Total headcount and full-time equivalents
- Number of applications received
- Volume of documents reviewed
- Total number of financial aid recipients
- Dollar volume of financial aid

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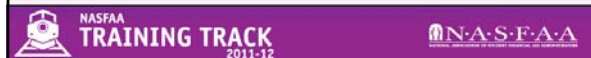
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## Adequate Staffing and Salary Tools

- NASFAA *Staffing Analysis Model*
  - Range of staffing levels based on data entered in tool and compared to survey data from institutions of similar size and scope
- NASFAA *Salary Survey tool*
  - Specific to financial aid profession
  - Can determine average or normative salaries based on education level, institution type, job title, primary duties, and geographic location

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# Administrative Capability: A Campus Wide Compliance Requirement

## Separation of Functions

- There must be adequate checks and balances in the school's system of internal controls
- A school not only should be able to detect, but also to prevent:
  - Fraud and abuse in its administration of the Title IV programs, and
  - The misuse of federal funds

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## Separation of Functions

Institutions must meet the following requirements:

- No one office may have responsibility for both functions with respect to any student aided under the programs
- Individuals carrying out these functions for any particular student must be organizationally independent
- Individuals may not be members of same family
- Individuals may not together exercise substantial control over the institution

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## Separation of Functions

If a school uses electronic processes for awarding and disbursing Title IV aid, how do they fit in with these checks and balances?

- ED permits the office responsible for the award function to “press a button” that authorizes an award and simultaneously makes the disbursement
- Assumes the system is properly programmed with safeguards and internal checks

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# Administrative Capability: A Campus Wide Compliance Requirement

## Contingency Planning

Contingency planning is anticipation of the unexpected and preparation for the possibility that things may not go as projected

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## Contingency Planning

Administrative capability regulations require an institution to have written procedures or information indicating the responsibilities of the various offices with respect to:

- Approval, disbursement, and delivery of Title IV aid, and
- Preparation and submission of reports to ED

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## Contingency Planning

Types of contingency plans:

- Security emergency
- System threats
- Natural disasters
- Funding freeze
- School closure

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# Administrative Capability: A Campus Wide Compliance Requirement

## Contingency Planning

- When an emergency occurs, “business as usual” is suspended
- Length of time to return to normal operations depends on whether the institution has a contingency plan and how well the institution planned for the unexpected

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## Communication

- One key factor of administrative capability is communication
- Effective cross-campus communication is vital to achieving compliance

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## Offices Within An Institution Where Conflicting Information Can Affect Title IV Eligibility

The Admissions Office:

- Documentation of a high school diploma
- Regular student status
- Simultaneous enrollment in elementary or secondary school and an eligible postsecondary program

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# Administrative Capability: A Campus Wide Compliance Requirement

## Offices Within An Institution Where Conflicting Information Can Affect Title IV Eligibility

The Admissions Office:

- Receipt of a prior baccalaureate degree
- Incarceration
- Conviction of the possession or sale of drugs
- State residency

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## What Is Conflicting Information?

Examples of Title IV-related data items that may conflict with information found in other campus offices include:

- Citizenship status
- Accuracy of the Social Security Number
- Default or overpayment status

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## What Is Conflicting Information?

Examples include:

- Drug convictions
- Change of enrollment
- Change in academic status
- Receipt of other student financial assistance or resources

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# Administrative Capability: A Campus Wide Compliance Requirement

## What Is Conflicting Information?

Examples related to cost of attendance:

- State residency assessment
- Campus room and board costs
- On-campus day care expenses, or
- Disability-related expenses

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## What Is Not Conflicting Information?

Examples include:

- Household size versus number of exemptions on a tax return
- Roster of candidates versus a list of recipients
- Privacy protected information
- CPS assumptions
- Estimated income on FAFSA
- Expired citizenship document versus secondary confirmation match

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## Strategies to Coordinate Dissemination of Information

Establish a committee

- Success of this type of committee is contingent on the participation of prominent campus officials such as deans, department heads, and central administration officers

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# Administrative Capability: A Campus Wide Compliance Requirement

## Strategies to Coordinate Dissemination of Information

Educate department officials on:

- Responsibility of institution as a whole to implement statutory and regulatory requirements governing Title IV programs;
- FAFSA process;
- Need analysis process;
- Satisfactory academic progress policy; and
- Packaging policy

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## Develop Campus-Wide Policies and Procedures

- Standardize institutional practices
- Support compliance with federal and state requirements
- Formalize roles of each office within institution
- Promote interoffice communication
- Source of in-house training for new employees

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## Methods to Disseminate Information Campus Wide

- Generate computer reports
- Establish timely notification dates
- Permit campus-wide “read only” information

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# Administrative Capability: A Campus Wide Compliance Requirement

## Resolution of Conflicting Information

To resolve conflicting information, an institution must:

- Determine what information is correct; and
- Document the outcome in the student's records

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## Shared Mission

- Compliance and service start with mission statement
- FAO mission statement should mirror campus-wide commitment to students through:
  - Enrollment and retention efforts
  - Customer service
  - Recognition of goals of other departments
  - Camaraderie, outreach, and collaboration

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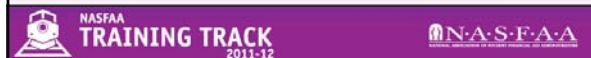
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## Your Plan

- Create realistic collaboration plan
- Conduct your self-assessment
- Share finalized plan with superiors and seek feedback before implementation

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# Administrative Capability: A Campus Wide Compliance Requirement

## Your Plan

Share information, ideas, and strategies to accomplish objectives, including:

- Understanding of operational issues related to your plan
- Shared interests and common issues needing to be addressed

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## Your Plan

Share information, ideas, and strategies to accomplish objectives, including:

- Shared resources of related or parallel planning activities already being performed
- Identification of other affected staff and/or offices on campus

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## Researching Useful Data

- Research needed to:
  - Provide vital data
  - Relate FAO activities to school's mission
  - Answer questions
- Comparative data analysis assists in identifying trends and making projections
- Simple raw counts, averages, and percentages often make obvious points

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# Administrative Capability: A Campus Wide Compliance Requirement

## Campus-Wide Collaboration

Any campus-wide collaboration should also focus on:

- Public relations initiatives
- Working inter-office relationships
- Constant and irreplaceable customer service

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## Training and Cross-Training

- Train staff outside FAO so they understand federal requirements and compliance issues
- Find and provide cross-training for:
  - FAO staff
  - Administrators with whom FAO works most closely

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## Contact



**Questions?**

[lagroned@nasfaa.org](mailto:lagroned@nasfaa.org)

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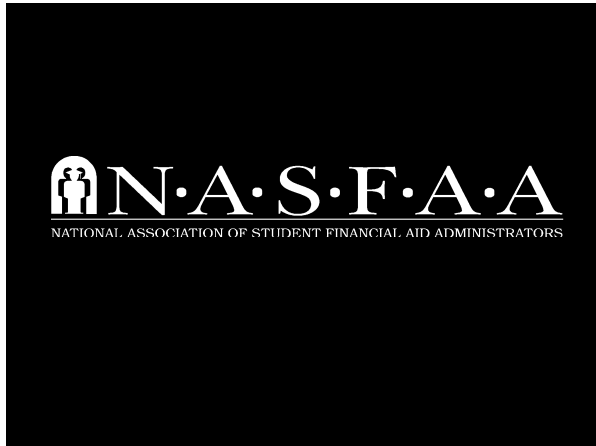
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# Administrative Capability: A Campus Wide Compliance Requirement



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