

H. Langer-Evans: How many of you have used the federal student-aid assessments before? Oh, that's great. Good, good. How many of you have used the policies and procedures templates or guide? Oh, I love it! Excellent. We are going to spend time today learning where to locate the federal student-aid assessment out on IFAP. How many of you used IFAP? That has to be all of you. Yes! You're all awake. Wonderful. And we're going to review the policies and procedures templates, and we're going to go out to the guide to creating a policies and procedures manual. So we have templates to help you if you already have a guide to creating a policies and procedures, you have a manual in your office, or you need to create one. How many new schools do I have who are just learning and need to put a policies and procedures together? Awesome. Terrific. And most of you – how many of you have a policies and procedures guide, one big guide? Okay. How many of you just have policies and procedures just in different locations – which is perfectly acceptable, you're not doing anything wrong. Okay. We're going to encourage you to do a guide so you have one place to get all your information, and we actually have a template to help you with that, so that's really great.

So we really welcome you here. We love your ideas. At the end of this session you'll have our e-mail addresses, and if you have ideas to make it better, we want to hear from you. And a lot of the way it was designed was from previous conferences, where you guys gave us your ideas, so your ideas really do matter. Let's go to slide number three. You can see that up on the screen. And we're gonna go out to ifap.ed.gov, is where you would go. Mike will go out there when he shows you the guide. Right now we're gonna stay with the templates, and we're gonna go "tools for schools." And when you go to "tools for schools," you will see it listed, federal student-aid assessment – you'll see that blue arrow pointing to it. Can everyone see the screen? Okay. Excellent. When you click on that, and we're on slide number four, you're going to see the home page of the federal student-aid assessments. And the federal student-aid assessments is really a compliance tool to help you stay in compliance.

And you'll see four sections. There's a student section, and that student section goes over student eligibility, satisfactory academic progress – oh, we just updated that. Why? You have new regulations coming out next year, aren't you? So we're actually gonna go out and show that to you probably sometime today, this afternoon, and you'll get to see how we updated that for you. We have a section for '10-'11, and then we have all the new regs for you for '11-'12, so Mike and Warren, my colleagues, get kudos for

that because they got it done before the conference. I thought that was pretty darn cool. And we also have verification. Now, verification's also going to be changing, isn't it? And we'll be getting that updated for you for the '12-'13. And then we have school section and we have institutional eligibility. We have default prevention and management. That's very important, especially with all direct-loans information coming and going. Consumer information. There's been a lot of changes with that in the last year. We have updated that. I recommend you take a look at that if you have a chance. And we also have a section on automation.

We also have a section on managing funds, which is of course all your fiscal. You have your return to Title IV, you have all your fiscal worksheets. How many of you are doing monthly reconciliations like you're supposed to? Oh, some of you are! Good, you're supposed to! We have monthly reconciliation worksheets out there for ya. We also have year-end worksheets out there for you. Really good way for you to self-audit yourself to make sure you're doing what you need before that auditor or program reviewer comes out. That's what's so cool about the assessments 'cause if we can find it, so can you, and you'd rather find it before we do. All right? And that's the whole premise of the federal student-aid assessments. And what we're gonna spend our time on today is innovations, and that's the policies and procedures templates and the guide to creating a policies and procedures. Let's go on to page five of your materials.

The templates are designed in three sections. For all of my new schools, this is great for you. This is a beginners' section that was designed with the institutional improvement specialist that we have on campus – “on campus,” listen to me, I'm back to my old days, I introduced myself, and there I am, back on campus – for the compliance folks, and it really helps you get started with your policies and procedures. You want to make sure that these are the first areas that you attack. And we have templates to help you fill that out and how to do it. Then we are going to take a peek at the admissions template, and when you click on that and you go to page six, the template opens. And what it does is, you'll see that it tells you what the procedure is, ability to benefit. Now, do you need to fill out ability to benefit if you don't accept ability to benefit? No. But if you have ability to benefit, you're gonna fill this out.

What's beautiful about these templates – it's linked. It's hyperlinked to all the regulations that pertain to ability to benefit.

How many of you have the code of federal regulations on your desk? Not too many, a couple – I do. I still love that paper. But it's really, really nice to have that all there for you, and then we bullet what you need to include, so if you already have an ability to benefit policy and procedure, it's great to pull out the template to see if you have all the areas covered. That's one way you could use it. If you're a new school that I have out in the back, this is great for you to know what you need. Once you are a new school and you have completed all of the four for yourself, then you're gonna want to go to the intermediate level. Most of you are gonna be at the intermediate or advanced level, and we'll talk about that right now. Let's go to slide seven of your PowerPoint.

When you click on any of the hyperlinks, I can prove to you, it takes you out to the regulation, takes you out to the most current regulation, and you can read it away and make sure that you have everything it is that you need to do. Let's go to slide eight. Also a part of every single template is a process for you to keep track of what you're doing. If you don't assign that template to someone, is it gonna get done? I don't think so. So we ask you to assign it to someone. Get a start date, get an end date. And we also remind you that your policies and procedures, no matter what section you're doing, must be updated. All right? Because if you don't update, you get yourself into trouble. One, you're not putting in the new regulations, and we've had an awful lot of them the last couple of years. Because when a program reviewer or an auditor comes, and they read your policies and procedures, they're gonna hold you to what you say in your policy and procedure, so if you haven't updated to reflect what you're doing, you're gonna get yourself into trouble. So updating sounds tedious, and it is lengthy, but you need to do it, and if you do it on a schedule, it won't be as overwhelming. But, really, that's where my schools get themselves into trouble.

Let's go to slide nine. This is the intermediate section, and the intermediate section is sweet. It lists all of the minimum requirements that you need for the areas for your policies and procedures. And in this intermediate link, there's also a link to a template which is – Mike, and why am I pulling a blank? What's the link? The link to – policies and procedures at a glance. Ugh, man, my age is catching up to me. When you click on that, it also gives you a nice quick little document that you can print and put up on your desk and say, "Let me see if we have met all those minimum requirements." Mike and I did this by going through the federal code of regulations. We read it – and this is not a lie – at least eight times, and that was tedious. My goodness. And we

looked for every reference to policy and procedure, and we created this document and the intermediate link that we're going to see in just a moment.

The training officers, when I approached them, I said, "What could we do for policies and procedures for you as you go out and train" – they said, "Make us a chart," so a chart we made. And I think you're going to really, really like it, and it's our gift to you. We're very, very excited. I was hoping to have it printed and handed out to you, but for some reason it didn't get printed, and it wasn't in my box, so I do apologize, but you can do that when you get back to the office. Let's go to slide ten. Here is an example of what is required for minimum requirements, and if you look at the code of federal regulations, that's how this is designed, in the same order as if you opened up the federal register, so it should look familiar, it should be comfortable for you. It's nothing new, but what we did was we designed it in a way that I think makes really good sense. So what I wanted to do in this particular area is I wanted to look at satisfactory academic progress, and, Mike, when we did that – and Mike and I added this, so do you mind, Mike, if we go live to that? 'Cause Mike and I fixed this just before we got here, so you don't have this in your material, but I just wanted to show you how we updated it and how you can tell that it's been updated.

So when you click on satisfactory academic progress, the template will open, and it will show you the '10-'11 year, and when you scroll down it's going to show you the '11-'12 year –

Michael Cagle: One sec.

H. Langer-Evans: – once it decides to come up.

Michael Cagle: It's almost there.

H. Langer-Evans: It's almost there. Great, Mike. The wonderful thing about it is, if you look on slide ten of your materials that are in front of you, you will also see that we provide a section that you can find this in the policies and procedures guide, that you can actually – Mike is gonna show it to you in a few moments – and you actually can go in there and start typing away. It's really quite sweet, and you're going to like that. And we also tell you a related assessment, so if you're looking at satisfactory academic progress and you need to update it, you might want to first see – "How well is SAP working at my school? Are we doing what we think we're doing?" We give you an assessment so you can self-evaluate what you're currently doing. You don't have to do that, but it's something that

we wanted to provide you. And it's taking its few moments to open up. We're competing with a lot of Internet time. And there we go.

And if you can see, right up on the top, it says '10-'11, so you know that's what's pertaining to things now, and if you scroll on down you'll see that Mike updated it for '11-'12, and, at the very end of the assessment, it will tell you the last date it was updated, so you'll always know, "Gee, does this include the new regulations? Oh, it was updated in November. Yep, it sure does." And there we go for '11-12. Very, very nice. Let's go to slide 11. This is an example of the SAP that we just looked at before we updated it, just prior to the conference, and you'll notice that the regulations for SAP – how many of you have looked at the new regulations for satisfactory academic progress? It's a lot longer, isn't it? And it's now residing more at –

Michael Cagle: 668.34.

H. Langer-Evans: Oh, 668.34. Mike knows it well, as he updated it before it was – most of it was residing 668.16e, so it has switched a little bit, and I think you'll find that very, very helpful. Let's go to slide 12, the advance template. Well, the advance template is for all of you who may have a policies and procedure. You went back to your office, you took my intermediate link, and you said, "Ooh, we need to update this a little bit, we need to tweak that a little bit, but I feel good about my policies and procedures. We checked it all." Well, what about the advance? Well, the advance is not necessarily required to include in your policies and procedures, although some of them are required by law to have – and we'll talk about that in a second – but doesn't necessarily mean it has to be in your policy and procedure, but it makes sense. So let me see – what is Holly talking about? Let's go to slide 13 and see.

One of the things we have in here is – I was going to show you – is the business office and how they interact with you, and one of the things is really helpful who's new to your school, or an auditor or program reviewer, is to know what the business office is responsible for and what your responsible for in the financial-aid office. You'd be surprised. When I was a program reviewer, it shocked me when I'd go to the business office and they would say, "Financial aid's doing that," or financial aid would say, "Oh, no, the business office is doing that," and now you got a finding, and sometimes, especially when it comes with the business office, it's usually something where you owe money back, so you really want to make sure that you're talking with each other, and why it's so

important to have them included in your policies and procedures development and review because you'd be surprised – and it's innocent. I don't think people are doing it intentionally. Just people are assuming, and that makes a lot of trouble sometimes, so we really recommend that you do that.

So let's go on to slide 15, and slide 15 is an example of that policies and procedures at a glance that I told you about. There's a link right off of the intermediate and advance, and it's really, really sweet. I think we want to go to the next slide, Mike?

Michael Cagle: Sure.

H. Langer-Evans: Thank you! And here we have that policies and procedures at a glance. It's the same thing as the intermediate. It's designed just a little differently, so all you do is see the area, you see what section it is in the guide, and we provide you the links right there, so if you really just wanted to quickly cross-reference something, you could do that. It's just a little cleaner, I think, and a little bit easier to use when you're evaluating your own policies and procedures. And with that, I'm going to give it to Mike, and you're actually going to go out and see the guide, and the guide is really, really neat, and it allows you the opportunity to go in and type away. Especially the new schools, for those of you who don't have a manual yet, I think you might like this. Mike?

Michael Cagle: All right. Thank you, Holly. We're gonna stick to your materials, so I'm gonna tell you exactly what slide you're on, but I'm also going to – when applicable, I'm gonna show you live on the web site and enlarge it so you can see what we're talking about. There. I'm gonna finagle my way here so I can do both of these. Okay, we are now gonna take a look at the guide to creating a policies and procedures manual, and we are on slide 16 of your materials, and, as you can see by looking at this particular guide, this is something that's fairly new, and it's now available under the innovations portion, as Holly mentioned to you, of the policies and procedures – innovations of policies and procedures of the FSA assessments. One thing to remember is that we worked with compliance folks, we worked with training officers, institutional improvement specialists, and we worked with other colleagues and federal student aid, and even some of our colleagues in DC, as well, and the regions, to actually get together and come up with a guide that can help schools develop their policies and procedures either from scratch – maybe they want to start all over again – or perhaps they want to develop them or enhance what they already have written.

Now, a lot of you may not be aware – and Holly mentioned this earlier – you’re not necessarily required to have your policies and procedures in a manual. You do have to have policies and procedures written, you can have them in various sections, but you’re not required to have them in a manual format. What we want to show you today is this manual format that we created. All those templates that Holly just demonstrated to you and that you see in your prior slides, we’ve kind of put those all together into some kind of manual format that you can use as a template, and we hope that you walk away with something today – one of the things you walk away with is that perhaps you might consider looking at that template for the guide itself to see if you can perhaps enhance what you already have or, maybe even better yet, start from scratch, like some of our other schools, and one of the schools that’s in the materials itself, **the minimum** materials that we gave you. Perhaps you can even consider doing that and starting from scratch if you choose to do that.

Okay. I’m gonna go in live to the site now, and you’re gonna be able to see exactly what’s on slide 17. And in order for me to do that, I’m just gonna quickly get out of here, which I didn’t want to do. It’s a lot more difficult than I thought it – there we go. There we go. Now we’re back into the FSA assessments, and I’m gonna make this larger on the screen so that you can see it. It shouldn’t take more than just a couple of seconds, here. There we go. Okay, now we’re back onto the main FSA assessment page, and you can see, under the innovations section, we have the templates that Holly mentioned for you, the very first link, and the second link there is the link to the guide to creating the policies and procedures manual, and I’m gonna click on that, which I did here, and you can see now that we have what you see on slide number 17. This is actually – we’re into the introduction section, so we’re clicking on the introduction section, and that’s gonna open up what you see on slide 17. Okay. But before we actually go on to slide 17, I want to go back to slide 16 for just one second because I think it’s important that you see how this guide was set up.

H. Langer-Evans: It’s blinking on the bottom.

Michael Cagle: Yeah, I’ll keep it there. Now you can see, on slide 16, you can see that there are various sections to this guide to creating a policies and procedures manual. The first thing that you see on slide 16 is we have the table of contents and the cover page. We actually have developed a nice template for you to use if you want to use a template that has a cover page, table of contents, and that’s that

first link. The second link is an introduction, and section one, which has the first part of the policies and procedures manual, and it also has some wonderful introduction pieces for you to consider using as part of your manual as well. It sets some rules as far as maybe some icons that you might want to use to maybe draw a user's attention to a particular area. It gives you some great tools to use. And then we have section two, and section two will address the institutional eligibility requirements for you policies and procedures. Section three outlines the requirements from the general-provisions regulations, and section three happens to be where SAP is because general provisions 668 is where SAP is in the regulations, and we showed you that template just a minute ago.

Section four talks about the federal Perkins loan program. Section five, we discuss the federal work study and job location and development program, and then, section six, we talk about the requirements for FSCOG. So that's what you see on slide 16, and you can also see that we've gone live to the site, and we have shown you that particular part. Now we can go back to slide 17, and I want to take a look at the introduction, which I clicked on, and once I click on that – there we go – it takes you to what you see there on slide 17. I'm gonna make it bigger so you guys can see this. All right! No, it's not letting me do this. I'll get it. There we go. Okay, so now we've got the guide to creating a policies and procedures manual. Now, the first part of this guide provides you with suggestions regarding areas that you might want to consider completing first, and especially for new schools, and we have a couple of you out there, there are some suggested areas that you might want to consider completing first, and we have those listed there.

As you can see, there's SAP, admissions, refunds and return of Title IV, there's consumer information, and there's verification, Perkins loan, and federal work-study election and awarding, and FSCOG selection. Those are some suggested areas that program reviewers and auditors will sometimes look at first when they're looking at your campus, and having those developed first if you're a brand-new school is a good idea. For schools that have been around for a while, this might be a good idea for you to take a look at these sections and see if you need any enhancements, if you're gonna be looking at enhancements to be done as well. So that's on slide 17. Slide 18, we talk about, as we mentioned earlier, some suggested icons that you might want to consider using in your policies and procedures. We provide that here, and I'm going to scroll down – we have the table of contents, and we have the icons

here. And you see there's a copy of this on your slide that you have in your materials, but one of the very first things that you see on here is a good practice.

And the good practice is kind of a nice thing because these might be areas where you're not required to include these as your minimum requirements or policies and procedures, but if you choose to, having it as good practice might be a good thing because it might enhance what you're doing, and it's a good thing to have if you're gonna do a good practice. If you're gonna have good practices, which we have recommendations throughout the guide, we have that little star emblem there, that star icon, which makes you kind of focus in on that particular item and say, "That's a good practice. That's not something that's required, but it's a good practice that we would consider using." If you're not gonna use a good practice, then obviously you would not include that as part of your policies and procedures 'cause you're not required to have good practices in there. We've provided them for you as just suggestions, but the whole point about this slide, and I think it's really important, is that we've done all the work for you. We've provided you with these icons that you might want to consider using as yours, to help you. And that's on slide 18.

We move on now to slide 19. We're gonna take a look at the very first part of this particular section, and it's called institutional overview. And I'm gonna scroll down, and you can see on slide 19 as well, this is kind of nice because what do you see there? You see an icon, right? You see an icon. An icon means it's a good practice. You're not required to have this as part of your guide, but we have it here because we think it's a good idea that you do include an institutional overview. Why is that important? Well, if you have an auditor or a program reviewer looking at your information, it's oftentimes nice to have this particular information about your school. It makes it easier for them to understand how your school is structured, how your school is set up, anything unique that might be applicable to your school that might help them understand how you operate. It's also important for you own staff because you might have new staff, and if you have this particular information in there, then they're also gonna have a better time understanding how the school is set up, and it'll help their learning school and help their learning process, even make that much easier for them, as well.

So that's a good practice, and we show that on 19. Are you required to have this, again? And I stress here, no, you're not, as part of your policies and procedures. But wouldn't you agree that

it's a great thing to have to enhance your procedures? And especially if you're gonna include it in a guide format or a manual format. Okay, and then on slide 20 we talk about the very first section, which is Part 1.1, and here we are on the screen. We have Section 1.1, which is – here we go, I've gotta scroll down a little bit farther – there we go – adequate staffing. (*Laughter*) I knew I'd get a laugh out of that. That's why I paused. Adequate staffing. Now, adequate staffing is something that is required. You need to have – if you look at the regulation there, if you look at the very top right-hand corner of the screen and also on the top right-hand corner of your slide, it does tell you. The whole entire manual is set up this way.

It says, "This section is required," and then it gives you the regulatory citation to tell you where it's required and what the requirement is, and if you clicked on that 668.16b, it would – in case you were interested, it would take you right there. So if you're looking at this electronically, you don't have to have a book in front of you. You don't have to search for your regulation. You would click on it, and it would bring you right to that reg, so as you're developing your policies and procedures, I think that's extremely important, to have that regulatory citation in front of you, because that's really where the requirement comes from. It's not something we pull out of the air. It's something that is taken directly from the regulations. I think that's important. And this makes it so user friendly because the 668.16b is where it's required, and we tell you that. You always know, and all of the whole entire guide, if a section is required or if a section is just a recommendation as a good practice. And that's important to know that.

But you can see there's all kinds of great information there about how you can determine whether or not you have adequate staffing and how you can make sure that you have, with your procedures. So you're listing the offices that are involved with dispersing aid, and you're also providing a short description of what each office does. Okay? And that's slide number 20. Slide number 21 is part 1.2, and this is adequate checks and balances. Now, for those of you who have memorized the regulations (*Laughter*), you'll notice that this comes right after the prior section in the regs, 668.16c. Okay? So now you have your adequate checks and balances procedure. Again, you notice that this section is required. You need to make sure that you have documentation to show that you have separate division of responsibility for the financial-aid programs between your financial-aid office and your business office. There has to be separation of function. Your procedures

should show how. Your procedures should show what each office does. Why do you think that's important? Well, it's important because you can't have the office dispersing aid and awarding aid. They have to be separate functions, and that's why we did this. We want to make this easier for you, and we hope that this is going to be something that you'll use.

The next thing that you see, on the bottom of slide 21, is a good practice suggestion, and we talk about providing specific detail about your organizational structure. And, again, this is helpful. It's not required, but it is helpful for you to have this in your manual. You don't have to. Now, if you do – let's say that you're like, "Mike and Holly, I love your template. You guys worked hard on it. I used it. If I have that good practice in there, do I really have to follow it?" Yes. *(Laughter)* Once that's in part of your procedures, you have to follow it. So you really need to think through the depth that you want to go through with your policies and procedures. If you want the minimum requirements, great, we've got the template for you to do that. If you want to go above and beyond, make it easier for your staff, make it more beneficial for folks to understand what you actually do as a unit, then we highly recommend these policies and procedures for the good practices, but are you required to do it? Absolutely not.

Okay, and that's slide 21, and then slide 22, we talk about SAP. And this is a great example. Again, you can see that it's required. 668.16c and 668.34. Now, as Holly mentioned to you earlier, and when we looked at the templates, we do have requirements that are currently in effect right now for 2011 and prior award years, and then we have, if we scroll down to the next page, we have SAP policy requirements for 2011-12 and beyond. So that's important because there's more specific requirements for you in that particular award year. So this gives you a good opportunity to maybe pull this out, take a look at what your SAP policy is now, and make sure that you're getting ready to gear up for 2011-12. As you can see, there's a lot more information in there than there was before. Okay. On slide 23, we talk about an academic year definition, and we have that as an important piece of information for you. We have that icon there. It's got a little exclamation point. That means it's important. Now, schools are required to define their academic year. We all know that. It is really essential that you include this definition in this particular section. We think it is. Do you have to put it in this particular section? No. But we think it's a good idea for you to include your academic year definition.

Why do you think we did that? Your academic year definition, when you're looking at your SAP policy, don't you think it's kind of important to know what your academic year definition is if you're reviewing SAP, especially for an auditor or a program reviewer? Knowing how you define your academic year, you need to know that – it's sort of related to SAP, and that's why we chose to put it there. You may not choose to put it at that particular section, but that's why we chose to put it there. And that's in 668.3. You're not necessarily required to have this as part of your guide, but you are required to define your academic year, and why not just put it here because it makes sense to put that there. And that's on slide 23, and then we get to slide 24 and we talk about conflicting data, and that is section 1.4 of the guide, and we tell you where it's required, and we give you some great ideas about conflicting data, but more explicitly we give you a couple of charts.

Chart A provides some examples of what the Department might consider conflicting data, so we would really want you to take a look at this particular Chart A to see if you have procedures in place to ensure that you do indeed follow these conflicting-data procedures. We also have another chart, and this particular chart has been looked at by our office of secondary education. We work with **Carny McKulla**. We've worked with Jeff Baker, as well. So this particular chart has been looked at. Chart B is another chart, and it's a chart that is not required, but we think that you might want to consider including some of these. Some of you may already be doing some of this when it comes to Chart B, but you're not required to necessarily do that, so we have another chart that we think might be a good idea, but you're not required to do it. It's just another good practice suggestion. Holly?

H. Langer-Evans: And, Mike, if you decide to do Chart B, you ought to make sure you're doing it!

Michael Cagle: Again, we can't stress enough, if you do decide to include a good practice such as Chart B, then make sure you actually do follow it. Okay, we're almost getting done to this. Let's take a look at slide 25. Now we get to slide 25, and that's part 1.5, and now on the screen here you can see that we have part 1.5, which is identical to the slide itself, but I think it's a little bit easier to see on the screen here. This is your fiscal reports and your financial statements. It's really important to note that you're required to include your fiscal procedures in your policies and procedures manual, but the procedures that are outlined in this section are pretty much general fiscal requirements that might be applicable to other sections of the

guide. For example, you have to have federal work study procedures for fiscal. You might need to have Pell procedures for fiscal.

But many of those come from the same exact regulation, so if you've covered it in this particular section, you can always refer to this section in those other section, saying, "We've covered our fiscal requirements for this particular program in section 1.5," and we've given you some information to help you do that because most of the fiscal requirements come from the same part of the regulation, 668.164 and 668.24b, and then 668.16d, but most of them really do come from that 668.164, and you'll notice that as you look at the other sections. So the whole key is that if you do decide to use this manual, we've made it easy for you because you can include the fiscal part in this particular section, and then when you get to the other sections we've put a little reminder in there that you've already covered this in another section – you might want to do it there, refer the user to that particular section. There's no reason to rewrite something that you've already written, for your Pell Grant program, for example.

Okay, and that is slide number 25, and now we're gonna go on quickly to slide number 26, and for slide number 26, I'm going to just get out of the guide, and I am going to go back quickly –

H. Langer-Evans: And while you're doing that, Mike, I just want to remind you that we did provide you with an example of conflicting data as a completed assessment, so you may want to take a look at that just to get a feel of how an assessment would look if you completed it using the guide, so if you didn't pick that up on your way in, it is on the back table by the water cooler. By all means do that. But we thought you might like to see what one might look like actually completed, so we did that for ya.

Michael Cagle: Okay, thanks, Holly. And now you can see we're on slide 26, and I've got a copy of that up on the screen. This is the remaining part of the guide to creating a policies and procedures manual. We've briefly discussed the first sections on a prior slide, and now section seven contains the fiscal control and fund accounting requirements for the federal Pell Grant program, and I will tell you right now, they're identical to what you just saw in section 1.5. Section seven talks about the Pell Grant program there. We talk about the ACG **National Smart** in section eight. We talk about the FFEL program in section nine. You might ask yourself, "Mike and Holly, why are we talking about FFEL? Why do we need to have policies and procedures for FFEL?" Why do you think you would need to have them currently? Because you could have been participating in the

program last year or the year before, and, as you know, your auditor and program reviewer might be coming and looking at prior award years, so you want to make sure you have those procedures, still.

Now, eventually, as things progress with direct loan, then perhaps the direct loan would be the only thing that you would need in there, but we will continue to include section nine in there because it's important. And in section ten we talk about the federal direct-loan program because there are some different requirements. Section 11, teach grant, and then we finally have Appendix A, B, and C, and we provided you with a copy of a couple of those already. We gave you a copy of Appendix B, as Holly mentioned

H. Langer-Evans: Yeah, just B.

Michael Cagle: – which has pretty much an example of a competed policy and procedure for conflicting data, and then we have policies and procedures at a glance in Appendix C, and Holly showed you that on one of the prior slides, and that's slide 26, and then, if you look at slide 27 – I'm just gonna go back to the PowerPoint. Oops. Don't want to do that PowerPoint. Well, I guess that's the one they gave me. Okay, so I'm gonna go back to the PowerPoint, and we're gonna go on to slide 27. I'm gonna scroll down here. Okay, so on slide 27, we're gonna take a quick look at section seven because this is a federal Pell Grant program, and I'm gonna show you exactly what we were talking about when it comes to that fiscal requirement.

The first thing you see on slide 28 is section 7.1, and this talks about calculating federal Pell Grant awards, and you can see again the section is required, on the top right-hand corner, and it gives you the regulatory citation, and then we give you some great information about what you need to include. We also talk about some new requirements. We have another icon there. The other icon talks about something for 2009-10, talks about crossover and transition for Pell, and it talks about what your written policy must include for that particular area, and we also have information about two Pells in an award year, as well, so this is really important to address in that particular section on slide 28. Slide 29 is part 7.2, and these are your federal Pell Grant required and optional recalculations. Some of these things you need to make sure you include, as 690.80 is a regulatory citation, and this tells you those recalculations that you need to have procedures to make sure you're including those as part of your policies and procedures.

And then we get to section 7.3 on slide 30, and this talks about fiscal records and disbursement requirements for federal Pell Grant programs, and you can see what the regulation is, 690.81. When you look at 690.81, it says, “You must have procedures for fiscal that are required by 668.24b and 668.164.” Well, didn’t we just do that in section 1.5? We have those in the prior section that I showed you, so that little statement that we have there reminds you that you need to have fiscal procedures developed, but they’re also outlined in section 1.5, so just refer the user to that particular section. And then we have our conflicting data in part 1.4, which is something that is in 1.4 of the guide, and we wanted to show you that because that’s an example of Appendix B, and that’s on slide 31. We gave you an example of how that particular section might be completed, just to give you something to take back with you.

There’s also Appendix C, and that’s the policies and procedures at a glance that Holly showed you earlier, and that’s great. If you’re gonna print something out when you get back, this policies and procedures at a glance is a wonderful document because it lists all of your minimum requirements and gives you the titles and regulatory citations so that you can take a look at that. It’s just a one-pager. It includes all the ten sections or 11 sections of this particular guide, without the good practices. Okay. All right, so, as you can see on this next slide, we gave you some great information here about the FSA assessments. Specifically we talked a lot about the policies and procedures, and I think we really tried to stress how important it is to include your policies and procedures in a manual format. Now, I know a lot of you, when we talked to you earlier, you were already doing that, and that’s great, but what are the benefits of having it in a manual? Let’s talk about that for just a couple of seconds.

There are some great benefits. The first benefit is pretty obvious – to me, anyway. It helps you comply with the regulations because if you have it in a manual format, everything together, it’s a lot easier to keep it organized and have your – understand that you’re actually completing and following all of the minimum requirements outlined in the regulations. That’s the first benefit. It helps you comply, and having it in a manual, it makes it easier. That second thing, revise annually, on the right-hand corner on that particular slide, slide 33. You should be looking at your procedures annually. And why do you think that’s important? Well, things can change, one. Staff change, procedures change, the way you’re doing things might change. You need to make sure that your procedures are looked at so that you are actually doing

what you say you're doing 'cause you can be held accountable for something in your procedures that you're not currently following. You need to make sure that you are – having some type of process in place to regularly check your procedures, that's the first important thing for revising it annually.

The second thing is, what happens if a regulation changes and there's a new requirement? A good example is SAP. You need to make sure that you always check these. Now, we do a pretty good job of checking the regs and making sure we're up to date on these particular assessments, but you need to make sure you – that's another benefit of having it in a manual format, so you need to make sure that you are keeping in touch with all the regulations and the changes. Access by your staff – having it in a manual format makes it easier to have one document so that all your staff has access to it. That's a benefit. And then it also helps you to be proud of yourselves and be organized because having it in a manual, having something right in front of you, it's right there, it's like a book, you can follow it, and it's right there in front of you, and I think it helps you prepare and be more organized, especially for that program reviewer and auditor.

So what have we learned today? Well, we've learned a lot. We hope that we've actually provided you with some great information about the assessments and we've enticed you to go out there and take a look at them, especially the policies and procedures that we spent a majority of our time on this afternoon. We showed you where to locate them, and they're on IFAP. We talked about how the policies and procedures templates work, under the innovation section. You can use individual templates if you choose to. There's templates for all those minimum requirements. And we talked about the guide to creating a policies and procedures manual. We showed you how you can actually use that either enhance what you already have or start over from scratch and develop a new one. And then finally we discussed the value of having a manual, keeping your policies and procedures in a manual format, and we think that having it in a manual format – we provided some great ideas on how you might want to consider doing that.

Holly and I are extremely excited about this product. We do love to hear from people like yourselves, from schools. You're the ones that are using the products. We love to work with you, so feel free to call us or contact us anytime. Our contact information is on the screen and is on your slides. We are extremely excited to work with you in this particular area. It's something that's near and dear

to both of our hearts, and on behalf of federal student aid and on behalf of the quality-assurance program and the Department of Education, we do appreciate your taking the time to listen to us, and we hope we've provided you with some great information, and we look forward to seeing you in the PC lab if you want to look at the assessments further, and then, finally, we wish you a wonderful time in Orlando and some great sessions ahead of you. So thank you very much. If you have questions, we're more than happy to take them. *(Applause)*

[End of Audio]