Requirements for Accounting and Internal Control Systems

Schools participating in the Title IV HEA programs must account for the receipt and expenditure of such funds in accordance with GAAP. On a current basis they must establish and maintain the following:

1. Financial records that reflect each Title IV program transaction.
2. General ledger control accounts and related subsidiary accounts that identify each Title IV program transaction and separate those transactions from all other institutional financial activity.
3. Accounting and internal control systems that:
   • identify the cash balance of the funds of each Title IV program that are included in the school’s bank account as readily as if those program funds were maintained in a separate account; and
   • identify the earnings on Title IV program funds maintained in the school’s bank account.

34 CFR 668.24(b)(2) & 34 CFR 668.163(d)

The Department does not specify the type of system a school must use. However, the accounting and internal control system must be able to provide individuals examining the financial records of a school’s participation in the federal student aid programs with the type of information described below.

A school’s chart of accounts must identify all general ledger and subsidiary ledger accounts relevant to the Federal Student Aid (FSA) Programs. In addition, a school’s accounts, journals, and records must follow federal cash from the moment the funds are drawn through G5 to when funds are disbursed to students.
This includes when cash is:

- deposited into institutional bank accounts;
- transferred between bank accounts;
- posted to general and subsidiary ledgers;
- posted to the individual student account ledgers; and
- if applicable, disbursed directly to students.

Note: An institution is not required to have a specific or minimum number of bank accounts. However, an institution’s general and subsidiary ledgers must clearly identify the amount of Title IV funds, by program, in each account, including interest payments attributable to certain programs, such that a clear audit trail exists.

Reconciling subsidiary records to account balances

All accounts should be backed up by subsidiary ledger detail. Although a trial balance can be used to ensure that accounts balance in the aggregate, it does not guarantee that there is sufficient evidence that subsidiary records exist to support the totals in each account.

Errors can occur when corrections or changes are made to control accounts without corresponding adjustments being made to subsidiary records. While reconciliations between accounts and subsidiary record detail should be performed at least monthly and should be conducted on a more frequent basis during periods of high transaction volume, some FSA programs require monthly reconciliations.

ACCOUNTING RECORDS

An effective institutional financial aid program requires a cooperative effort among all school offices involved in delivering financial aid to students. Separate reporting and recordkeeping responsibilities required of each office, as well as shared responsibilities, are detailed in the Federal Student Aid Handbook, Volume 2.

The business office is responsible for most financial accounting and recordkeeping (except for the detailed records and files on individual financial aid recipients that must be kept in the financial aid office). The remainder of this appendix is designed to help the business office satisfy its accounting responsibilities efficiently and with minimal effort.

Bookkeeping and recordkeeping

Bookkeeping and recordkeeping systems should be designed to:

- enable timely internal and external financial reporting;
- meet documentation requirements;
• ensure proper filing of applications; and
• create accurate reports.

FUND ACCOUNTING SYSTEMS AND THE FSA PROGRAMS

A fund accounting system is required whenever an entity is responsible to a third party for ensuring that funds are used as intended by the third party. Such funds must be restricted for use in accordance with the third-party’s requirements and separate fund accounts must be established for each third-party program from which the entity is receiving funds. Fund accounting is the method of segregating assets into categories according to the individual program requirements placed on their use by the third party.

Fund accounting contrasts with the more widely known system used in corporate accounting in one fundamental way—entities receiving third-party funds may not exceed their budgets. Additionally, the concepts of encumbrance and budgeting obligations found in fund accounting are not found in corporate accounting.

Fund accounting is characterized by the following:

• A fund is a separate accounting entity with a self-balancing set of accounts consisting of assets, liabilities, and fund balances.
• Separate accounts are maintained for each fund to ensure observance of limitations and restrictions placed on the use of the resources of each fund.
• For reporting purposes, funds with similar characteristics are combined into fund groups.
• Expenditures are recorded in each fund and measured against budgets, thereby providing finite limits within which funded entities within the school must operate in carrying out their mission.

When designing an accounting system, the chart of accounts, books of original entry, billing and reporting requirements, and other FSA requirements must all be considered.

For example, the ledger accounts suggested in the chart of accounts that appears later in this appendix for the Federal Work-Study Program were created to help schools prepare year-end reports that must be filed with the Department. The school can simply copy the information from its ledgers to the electronic FISAP format supplied by the Department.

When designing a chart of accounts, schools also need to consider their fund-accounting needs, especially with respect to restricted funds or funds that are initially restricted. The chart of accounts should accurately
reflect the school’s current organization and programs and should have the flexibility to accommodate any future changes in the organization.

**Audit trails**

Your accounting records and systems for FSA funds must provide a clear audit trail that makes it possible to trace all federal cash from drawdown to its final destination.

An audit trail, whether in a manual system, an automated system, or a combination of systems, includes the accounting record of a transaction and all the documentation that supports each transaction.

In accounting records, when data is recorded, a reference should also be recorded to identify the source of the data. The reference can be in the form of a date, a name, an address, or a number such as a journal page number, ledger account number, or check number. These references, used throughout the accounting cycle, form an audit trail that makes it possible to trace the details of a transaction from the source document to the financial statements and accounting records.

A vital part of an audit trail is cross-referencing. Cross-referencing is the recording of identifying numbers pointing both ways in offsetting or supporting accounting entries. For example, in your FSEOG cash account, for a deposit received from G5, you would record an entry that pointed to the journal page on which you recorded the names of students for whom this particular cash draw was intended to provide the federal share. Likewise, on that journal page, you would record an identifier that pointed to the appropriate draw in your FSEOG cash account.

**Chart of Accounts**

As an aid in discussing records and accounting techniques for financial aid programs, the Summary Chart of Accounts later in this appendix lists accounts considered necessary for institutions to properly account for FSA program funds. These accounts may be set up in either a manual or automated accounting system. Either system will need the basic suggested ledger accounts to meet the Department’s minimum program and fiscal requirements, as well as the institution’s external reporting requirements, such as basic financial statements and fund statements. Such a system will serve to meet the accounting needs of the school, the Department, and other federal agencies. Additional accounts may be added as deemed necessary by the school. These accounts should be reviewed at least annually to determine if additions or deletions are necessary to meet changes in federal regulations.

The chart of accounts is a primary internal control mechanism delineating the framework of the accounts. This chart has two components: (1) a fund number and (2) an account number that usually follows a standard account-code structure (a definition, by name, of the account code). A uniform numbering scheme is used here to assist in identifying the parts of the financial statements on which ledger accounts
are located. The numbers assigned to these ledger accounts are arbitrarily assigned, but in sequential order, and these specific numbers are not required to put these ledgers in place in institutional accounting systems.

In all cases, the first digit of an account number identifies an element of the financial statements, as follows:

1–Asset Account
2–Asset Reduction Account
3–Liability Account
4–Capital Account (or Program Balance)
5–Capital Reduction Account
6–Income Account (or Revenue Account)
7–Expense Account

The accounting record for each federal student aid program is self-balancing and must be separated completely from the accounting records of all other federal student aid programs and from the accounting record for the general operating fund of the school. Within each program, the sum of ledger accounts with debit balances equals the sum of ledger accounts with credit balances.

In the following Summary Chart of Accounts, award authorizations are not shown. It is recommended that they be booked as a memo journal entry or budget item. Then, as award authorizations are adjusted, appropriate adjustments to budget figures would be entered. This process helps ensure that drawdown amounts do not exceed authorization levels.

**Note:** The G5 account shown in the Summary Chart of Accounts, account # 1–2 (Accounts Receivable, G5), is used only if a school is under the advance payment method for drawing down FSA funds. The accounting for alternative methods (e.g. reimbursement, HCM2, etc.) will not be covered in this appendix. However, account # 1–2 should be booked as any other account receivable. Each respective subsidiary ledger would also book the receivable.

For a lesson on DL fiscal requirements, follow the link to visit the FSA Assessments page at [https://ifap.ed.gov/fsa-assessments/03-12-2019-direct-loans](https://ifap.ed.gov/fsa-assessments/03-12-2019-direct-loans) and click on Activity 4.
Examples of information a school’s accounting system must be able to provide:

- Documentation that for any drawdown of federal cash the funds were deposited in an account in which the funds were clearly identified as federal.

- Documentation, if applicable, that for any drawdown the funds were transferred to the appropriate subsidiary ledgers or, if intended for students, posted to the students’ accounts within the three business days permitted.

- Documentation that if the posting of federal cash to a student account created an FSA credit balance, the funds were made available to the student within the 14 days stipulated by regulation (see Volume 5 for a discussion of FSA credit balances when a student withdraws).

- If the school holds FSA credit balances for students, documentation that there is a ledger that identifies all such credit balances and that there is sufficient cash in the school’s bank account to cover all such credit balances.

- Documentation that for each Return of Title IV Funds required under 34 CFR 668.22, within the time frame allowed by regulation, cash has been transferred from the student’s account to the school’s federal funds account and then has either been returned to the Department or reallocated and disbursed to other eligible students.

- Through its accounting system a clear audit trail to account for all Title IV, HEA funds throughout the cash management cycle.

- For the Campus-Based Programs, documentation that all nonfederal matching funds (when the matches are made with cash) were deposited before or at the same time that federal funds were received.

- For the Federal Work-Study Program, for schools without a waiver or exception, documentation that the school expended at least 7% of its FWS allocation in making payments to students employed in community service jobs for the year.

- For the Federal Supplemental Educational Opportunity Grant Program (FSEOG), documentation that the awards made to students equal the federal share, plus the institutional share minus any administrative cost allowance (ACA) taken by the school, plus or minus any funds transferred or carried forward/back.
Examples of information a school’s accounting system must be able to provide (continued)

- For the Federal Work-Study Program, documentation that the total gross compensation paid to students reported on the school’s Fiscal Operations Report is supported by the school’s payroll records including accounting records of any amount paid to students in noncash institutional matching

- For a school receiving funds through the heightened cash monitoring or reimbursement payment (Funding Controls) methods, documentation that before submitting a request for federal cash for a student, the school made the disbursement(s) with its own funds to the student’s account and identified the disbursement(s) appropriately (e.g., as a Federal Pell Grant)

- For a school receiving funds through the HCM or reimbursement payment methods, documentation that if disbursing its own funds (labeled Title IV funds) to a student’s account created a Title IV credit balance, the school made that credit balance available to the student within the 14 days required by regulation

- For any student who receives Title IV funds, a student subsidiary account/student ledger that clearly identifies the date and amount of each transaction, and the balance after each transaction

- Subsidiary financial aid ledgers that are year specific (though federal funds from different award years may be maintained in the same bank account)

Student Subsidiary Accounts/Student Ledgers

The Department considers student subsidiary accounts, also known as student ledgers, part of a school’s accounting system. Student ledgers and subsidiary accounts must follow the same rules as other sub accounts.
Summary Chart of Accounts

G5 Accounts (FSA funds only, not including Direct Loans)

To help in calculating excess cash and interest earnings on FSA funds (Federal Pell Grant, FSEOG, FWS, and Federal Perkins Programs) and, in accordance with cash management regulations issued on December 1, 1994, separate G5 accounts should be established for FSA funds and for non-FSA funds.

1–Asset Accounts
   1–1   Cash Control, G5
   1–2   Accounts Receivable, G5

3–Liability Accounts—None

4–Capital Accounts—None

6–Income Accounts—None

7–Expense Accounts—None

National Finance Center (NFC) Accounts

NFC accounts are needed to reflect amounts of FSA program funds disallowed after the program authorization account has been closed (removed from G5).

1–Asset Accounts
   1–1   Cash Unremitted to NFC
   1–2   Due from School

3–Liability Accounts
   3–1   Accounts Payable, NFC

4–Capital Accounts—None

6–Income Accounts—None

7–Expense Accounts—None
Federal Pell Grant Accounts

1–Asset Accounts

1–1 Cash, Federal Pell Grants

3–Liability Accounts—None

4–Capital Accounts—None

6–Revenue Accounts

6–1 Transfer from G5—Federal Pell Grants for Students

6–2 Federal Reimbursement of Pell Grant Administrative Cost Allowance (ACA)

7–Expense Accounts

7–1 Student Grants Paid—Federal Pell Grant

7–2 Administrative Cost Allowance (ACA) Paid to Institution

Federal Supplemental Educational Opportunity Grant (FSEOG) Accounts

1–Asset Accounts

1–1 Cash, FSEOG

3–Liability Accounts—None

4–Capital Accounts—None

6–Income Accounts

6–1 Transfer from G5—FSEOG

6–2 Institution’s Cash Contribution

6–3 Institution’s Noncash Contribution (Memo Account)

7–Expense Accounts

7–1 Student Grants Paid—FSEOG

7–2 Student Grants—FSEOG from Noncash Contribution (Memo Account)

7–3 Administrative Cost Allowance (ACA) Paid to Institution (if applicable)
Federal Work-Study (FWS) Accounts

1–Asset Accounts

1–1 Cash, Federal Work-Study

1–2 Accounts Receivable, Off-Campus Entities

3–Liability Accounts

3–1 Federal Income Taxes Withheld

3–2 Social Security Taxes Withheld

3–3 State Income Taxes Withheld

3–4 Other Withholding

3–5 Accrued Wages Payable

3–6 Employer’s Payroll Taxes Payable

4–Capital Accounts—None

6–Income Accounts

6–1 Transfer from G5—Federal Work-Study

6–2 Institution’s Cash Contribution

6–3 Institution’s Noncash Contribution (Memo Account)

6–4 Off-Campus Employer’s Contribution, Public/Private Nonprofit Entities

6–5 Off-Campus Employer’s Contribution, Private For-Profit Entities

7–Expense Accounts

7–1 Student Wages—On-Campus

7–2 Student Wages—On-Campus, Noncash Contribution for Nonfederal Share (Memo Account)

7–3 Student Wages—Off-Campus, Public/Private Nonprofit Entities

7–4 Student Wages—Off-Campus, Private For-Profit Entities

7–5 Regular Job Location and Development (JLD) Expenses Paid to Institution

7–6 Administrative Cost Allowance (ACA) Paid to Institution
Direct Loan Accounts
1–Asset Accounts
   1–1 Cash, Direct Loans
   1–2 Accounts Receivable, G5

3–Liability Accounts—None
4–Capital Accounts—None

6–Income Accounts
   6–1 Income from G5—Direct Loans

7–Expense Accounts
   7–1 Funds Advanced to Borrowers

Federal TEACH Grant Accounts
1–Asset Accounts
   1–1 Cash, Federal TEACH Grants

3–Liability Accounts—None
4–Capital Accounts—None

6–Revenue Accounts
   6–1 Transfer from G5—Federal TEACH Grants for Students

7–Expense Accounts
   7–1 Student Grants Paid—Federal TEACH Grant

Iraq and Afghanistan Service Grant Accounts
1–Asset Accounts
   1–1 Cash, Iraq and Afghanistan Service Grants

3–Liability Accounts—None
4–Capital Accounts—None

6–Revenue Accounts
   6–1 Transfer from G5—Iraq and Afghanistan Service Grants for Students
7–Expense Accounts

7–1 Student Grants Paid—Iraq and Afghanistan Service Grants

**G5 FSA Accounts**

1–1 *Cash Control, G5:* This account may be a debit or credit balance account depending on the timing of drawdowns and disbursements. It is established to identify the balance of federal cash disbursed to a school through G5. The system described here segregates federal cash by using separate accounts for G5 FSA-funded programs. These separate G5 accounts allow reconciliation of funds sent and/or available through G5. Separate checking accounts need not be maintained for each program as long as school records indicate precisely where cash was used.

Debit this account for:

- All cash received from G5 for all FSA programs, except Pell Grant ACA reimbursement or Perkins Loan cancellation reimbursements (contra account # 1–2).
- All unexpended cash on programs when accountability has been transferred to NFC (contra account # 1–2).

Credit this account with:

- All cash transferred to programs.
- Excess cash billings paid to National Finance Center (NFC) (contra account # 1–2).

1–2 *Accounts Receivable, G5:* This account can be a debit or credit balance account depending on the timing of disbursements and drawdowns. It represents all amounts due from all open-status G5-funded programs.¹ The debit balance may exist between the time funds are requested from G5 and the time they are received.

Debit this account for:

- Amount of awards disbursed to students and recorded as income transferred from G5 in each respective FSA program account.

Credit this account for:

- Cash received from G5 (contra account # 1 - 1).
- Any unexpended program balances after accountability has been transferred to NFC (contra account # 1 - 1).

¹ A different accounting treatment is needed if a school has been placed on a payment method other than the advance payment method for drawing down FSA funds.
National Finance Center (NFC) Accounts

1–1 Cash Unremitted to NFC: This account is used to reflect that a portion of cash is no longer under G5 accountability; the accountability has been transferred to the National Finance Center (NFC).

This cash is segregated if a grant’s final closing amount is in dispute. Accounting for the funds here reflects a transfer of accountability from G5. If more than one program is in dispute, separate subsidiary accounts should be set up for each one. Disallowed expenditures on open, current-year G5 accounts are recorded by reclassifying the expenditures from the specific program account to institutional accounts and reinstating the same amount from the FSA program account to the G5 account.

Debit this account for:

- Cash received from the school for disallowed expenditure (contra account # 1–2).
- Interest earnings on FSA funds that exceed the regulatory threshold (contra account # 3–1).

Credit this account with:

- Amounts remitted to NFC (contra account # 3–1).

1–2 Due from School: This debit balance account reflects amounts due from the school as a result of disallowed expenditures on closed accounts not under G5 accountability.

Debit this account for:

- Billings from NFC for expenditures disallowed by program review or audit, excess cash, and the like (contra account # 3–1).

Credit this account for:

- Cash received from the school (contra account # 1–1).

3–1 Accounts Payable, NFC: This account is normally a credit balance account that reflects any liabilities to NFC as a result of cash accountability separated from G5 as described earlier or disallowed expenditures on programs not under G5 accountability or excess interest earnings returnable to ED through NFC.

Debit this account for:

- Amounts remitted to NFC (contra account # 1–1).

Credit this account with:

- Billings from NFC (contra account # 1–2).
- Interest earnings returnable to NFC (contra account # 1–1).
ACCOUNT DETAILS

Federal Pell Grant Accounts

1–1 Cash, Federal Pell Grants: All receipts and disbursements of cash related to the Pell Grant Program are recorded in this account. Typically, this account would show a zero balance after each period’s entries are posted, as the transfer of funds from G5 should equal only the amount of grants to be paid immediately to students.

Debit this account for:

- Transfers from G5 account (contra account # 6–1).
- Recoveries from recipients (contra account # 7–1).

Credit this account with:

- Payments to students (contra account # 7–1).

6–1 Transfer from G5—Federal Pell Grants for Students: This credit balance account controls the transfer of cash from the G5 account “Cash Control, G5” to the Pell Grant account “Cash, Federal Pell Grants.” Such cash transfers should be made only in the precise amounts needed immediately to pay grants to students.

Debit this account for:

- Closing entry at end of accounting fiscal year, the total amount of cash transferred from G5 account to meet disbursement needs for the period (contra account # 7–1).

Credit this account with:

- Cash transferred from G5 account to meet current disbursement needs (contra account # 1–1).

6–2 Federal Reimbursement of Pell Grant Administrative Cost Allowance (ACA): This credit balance account is used to deposit the reimbursements received by electronic funds transfer (EFT) from ED for Pell ACA.

Debit this account for:

- Closing entry at end of accounting fiscal year for the amount of Pell ACA reimbursements (contra account # 7–2).

Credit this account with:

- ACA payments received via EFT from ED (contra account # 1–1).

7–1 Student Grants Paid—Federal Pell Grant: This debit balance
account is maintained to record payments made to students for Pell Grants.

Debit this account for:

- Grant payments made to students (contra account # 1–1).

Credit this account with:

- Recoveries from recipients (contra account # 1–1).
- Closing entry at end of accounting fiscal year for the total amount of grant payments made to students for the accounting period (contra account # 6–1).

7–2 Administrative Cost Allowance (ACA) Paid to Institution: This debit balance account is maintained to record payments made to the school for administrative costs. This amount cannot exceed the amount set by regulations.

Debit this account for:

- ACA paid to the school (contra account # 1–1).

Credit this account with:

- Closing entry at the end of the accounting period (contra account # 6–2).

FSEOG Accounts

1–1 Cash, FSEOG: All receipts and disbursements of cash related to the FSEOG Program are recorded in this account. Typically, this account shows a zero balance after each period's entries are posted, as the transfer of funds from G5 should be only for the amount of grants to be paid to students immediately and for administrative expenses.

Debit this account for:

- Transfers from G5 account (contra account # 6–1).
- Cash contributions of the school (contra account # 6–2).

Credit this account with:

- Payments to students (contra account # 7–1).
- Payments to school for administrative cost allowance (contra account # 7–3).

6–1 Transfer from G5—FSEOG: This revenue account is for controlling the transfer of cash from the G5 account “Cash Control, G5” to the FSEOG account “Cash, FSEOG.” Such cash transfers should be made only in the precise amounts needed to pay awards and ACA (if applicable) on a current basis.
Debit this account for:

- Closing entry at end of accounting fiscal year (contra accounts # 7–1, 7–3).

Credit this account with:

- Amounts of cash transferred from the G5 account to meet the federal share of current FSEOG grants (contra account # 1–1).

6–2 Institution’s Cash Contribution: This credit balance account is maintained to record cash contributions made by the school to provide (together with any noncash contribution) the nonfederal share of FSEOG grants.

Debit this account for:

- Closing entry at end of accounting fiscal year (contra account # 7–1).

Credit this account with:

- Amounts of cash provided by the school to pay its share of current FSEOG awards (contra account # 1–1).

6–3 Institution’s Noncash Contribution (Memo Account): This credit balance account is maintained to record noncash contributions made by the school to provide (together with any cash contribution) the required nonfederal share of FSEOG awards.

Debit this account for:

- Closing entry, the cash value of all tuition rebates or similar credits to student accounts as the nonfederal share of FSEOG awards at end of accounting fiscal year (contra account # 7–2).

Credit this account with:

- Noncash contributions provided from institutional resources to pay the nonfederal share of current FSEOG grants, including payments made directly to students from institutional funds (contra account # 7–2).

7–1 Student Grants Paid—FSEOG: This expense account is maintained to help prepare required FSEOG Program reports. If the school transfers cash to provide the required percent of the federal share, then this account would record both the federal and nonfederal shares of FSEOG awards. The debit balance in this account combined with account # 7–2, before closing, should agree with the sum of the individual award amounts shown in student records as FSEOG grants for the current year.

Debit this account for:
• Payments to students for FSEOG awards (contra account # 1–1).

Credit this account with:

• Closing entry at end of accounting fiscal year (contra account # 6–1).

7–2 Student Grants—FSEOG From Noncash Contributions (Memo Account): This expense account is used if the school makes noncash contributions and pays students a portion of their FSEOG awards directly from institutional resources.

Debit this account for:

• Payments to students for FSEOG awards from institutional resources (contra account # 6–3).

Credit this account for:

• Closing entry at end of accounting fiscal year (contra account # 6–3).

7–3 Administrative Cost Allowance (ACA) Paid to Institution (if applicable): This expense account is used to record ACA as it is paid to the school. Such payments are limited by regulations and may not be made from FSEOG funds unless students received FSEOG funds during the period.

Debit this account for:

• Payments to school for administrative expenses (contra account # 1–1).

Credit this account with:

• Closing entry at end of accounting fiscal year (contra account # 6–1).

Federal Work-Study (FWS) Accounts

1–1 Cash, Federal Work-Study: All receipts and disbursements of cash related to the Federal Work-Study (FWS) Program are recorded in this account. Any debit balance remaining after payroll payment should consist solely of institutional and/or off-campus employer funds, as federal funds should be transferred from the G5 Cash Control Account (G5 account # 1–1) only in the precise amount needed for the federal share of current disbursements.

Debit this account for:

• Federal contributions transferred from G5 account (contra account # 6–1).
• Cash contributions of the school (contra account # 6–2).
• Cash payments of off-campus employers (contra account # 1–2).
• Cash paid into fund by the school for later payment of employer's share of payroll taxes (contra account # 3–6).
• Cash contributions paid by the school for off-campus employers that have not paid their nonfederal share (contra account # 1–2).

Credit this account with:

• Federal share of on-campus compensation and federal and nonfederal shares of off-campus compensation to students (contra accounts # 3–5, 7–3, 7–4).
• Administrative expenses paid to the school (contra account # 7–6).
• Refund of contribution to the school (contra account # 6–2).
• Refund of contribution to off-campus employers (contra account # 1–2).
• Payment for compensation withheld (contra accounts # 3–1, 3–2, 3–3, 3–4).
• Payment of employer’s payroll taxes (contra account # 3–6).
• Job Location and Development Program expenses paid to the school (contra account # 7–5).

1–2 Accounts Receivable, Off-Campus Entities: This account is used to record the amounts due from off-campus employers for the nonfederal share of student wages. Separate subsidiary accounts should be set up for each off-campus entity.

Debit this account for:

• Amounts to be provided by off-campus employers to pay the required percent of the nonfederal share of wages of students employed off campus (contra accounts # 6–4, 6–5).
• Refunds to off-campus employers of excess cash contributions (contra account # 1–1).

Credit this account for:

• Cash paid by off-campus employers (contra account # 1–1).
• Cash paid by the school for off-campus employers that have not paid their nonfederal share (contra account # 1–1).

3–1 Federal Income Taxes Withheld
3–2 Social Security Taxes Withheld

Note: Students working in FWS jobs on campus while enrolled typically are not subject to FICA (Social Security and Medicare)
tax withholding. However, if they are employed between terms or in the summer, when they are not enrolled, they are subject to FICA taxes.

3–3 State Income Taxes Withheld

3–4 Other Withholding

If withholding is necessary, these accounts are used to record the tax amounts withheld from the pay of students employed under the FWS Program.

Debit these accounts for:

- Taxes paid to the appropriate agency for federal income taxes, Social Security taxes (when applicable), state income taxes, and other taxes (contra account # 1–1).

Credit these accounts with:

- Amounts withheld from students’ pay for payment of federal income taxes, Social Security taxes (when applicable), state income taxes, and other taxes (contra accounts # 7–1, 7–3, and 7–4).

3–5 Accrued Wages Payable: This account is used to accumulate student wages earned but not paid by the end of a report period. This is necessary because the FWS portion of the FISAP report requires compensation earned during the reporting period to be reported, regardless of when it is paid. The drawdown of cash from the G5 Cash Control Account is on a cash basis, and funds are not drawn down until accrued wages have actually been disbursed (paid).

Debit this account for:

- Amounts of gross compensation earned in the previous reporting period and paid during the current period (contra account # 1–1).

Credit this account with:

- Gross compensation earned, but not yet paid at the end of the reporting period (contra accounts # 7–1, 7–2, 7–3, 7–4).

3–6 Employer’s Payroll Taxes Payable: This credit balance account is maintained to record the amount of payments due by the school for the employer’s share of payroll taxes on accounts of students employed under the FWS Program. Federal Work-Study funds may not be used to pay any portion of such taxes. At some schools, the employer’s share of payroll taxes is handled directly from the general fund, and off-campus employers’ payments for their share of payroll taxes are reimbursed to the general fund rather than transferring the amount into the FWS fund. In this case, account # 3–6 would not be needed in the FWS set of accounts.
Debit this account for:

- Amounts of payroll taxes paid (contra account # 1–1).

Credit this account with:

- Amounts of payroll taxes payable from cash amounts transferred by the school or off-campus employers to pay their share of payroll taxes (contra account # 1–1).

**6–1 Transfer from G5—Federal Work-Study:** This credit balance account controls the transfer of cash from the G5 account, “Cash Control, G5” to the FWS account, “Cash, Federal Work-Study.” Such transfers of cash should be made only in the precise amounts needed for the federal share of current payroll, plus administrative expenses and Job Location and Development Program expenses. No transfer of cash should occur until the federal share of the currently payable payroll has been calculated.

Debit this account for:

- The federal share of wages earned (contra accounts # 7–1, 7–3, 7–4).
- Administrative expenses paid to the school (contra account # 7–6).
- Job Location and Development Program expenses paid to the school (contra account # 7–5).

Credit this account with:

- Amounts of cash transferred from the G5 account “Cash Control, G5” to meet current disbursement needs (contra account # 1–1).

**6–2 Institution’s Cash Contribution:** This credit balance account is used only if the school transfers cash to provide the required percent of the nonfederal share of student wages on campus, then pays both the federal share and nonfederal shares of campus wages from these accounts.

Debit this account for:

- Refund to the school of excess cash advances (contra account # 1–1).
- Closing entry, the nonfederal share (that is, the share for which FWS funds are not available) of cash wages paid to students employed on campus (contra account # 7–1).

Credit this account with:

- Amounts of cash provided by the school to pay its share of on-campus student wages (contra account # 1–1).
6–3  Institution’s Noncash Contribution (Memo Account): This credit balance account records the amount of wages “paid” to students by the school through tuition rebates and other such noncash means, as well as amounts paid directly to students from institutional funds.

Debit this account for:

- Closing entry, the cash value of all tuition rebates or similar credits to student accounts made by the school during the reporting period as its share of on-campus student wages (contra account # 7–2).

Credit this account with:

- Each pay period, the cash value of all tuition rebates or similar credits to student accounts as its share of on-campus student wages (contra account # 7–2).

6–4  Off-Campus Employer’s Contribution, Public/Private Nonprofit Entities

6–5  Off-Campus Employer’s Contribution, Private For-Profit Entities

These credit balance accounts are maintained to record contributions due from off-campus employers to provide the required percent (or more) of the nonfederal share of student wages earned off campus.

Debit these accounts for:

- Closing entry, nonfederal share (that is, the share for which Federal Work-Study funds are not available) of wages paid to students employed off campus (contra accounts # 7–3, 7–4).

Credit these accounts with:

- Amounts to be provided by off-campus employers to pay the required percent of the nonfederal share of wages of students employed off campus (contra account # 1–2).

7–1 Student Wages—On-Campus: This expense account is maintained to record the federal share of FWS wages. If the school transfers cash to provide the required percent of the federal share, then this account would record both the federal and nonfederal shares of wages. This account may be further subdivided into categories such as instruction, research, public service, and so on, to facilitate nonfederal functional reporting.

Debit this account for:

- The federal share of wages earned by students in on-campus employment from the first day to the last day of the reporting period (posted from payroll vouchers, adjusted as necessary for accruals) (contra accounts # 1–1, 3–1, 3–2, 3–3, 3–4, 3–5).
Credit this account with:

- Closing entry for the federal share of wages earned on campus (contra account # 6–1).

7–2 Student Wages—On-Campus, Noncash Contribution for Nonfederal Share (Memo Account): This expense account is maintained to record the nonfederal share of student wages paid from the institution’s tuition rebates or similar credits.

Debit this account for:

- The nonfederal share of wages “paid” to students through tuition rebates and other noncash means (contra account # 6–3).

Credit this account for:

- Closing entry for, the nonfederal share of wages earned on campus (contra account # 6–3).

7–3 Student Wages—Off-Campus, Public/Private Nonprofit Entities

7–4 Student Wages—Off-Campus, Private For-Profit Entities

These expense accounts are maintained to help prepare required Federal Work-Study Program reports.

Debit these accounts for:

- Gross amount of wages earned by students in off-campus employment from the first day to the last day of the reporting period (posted from payroll vouchers, adjusted as necessary for accruals) (contra accounts # 3–1, 3–2, 3–3, 3–4, and 3–5).

Credit these accounts with:

- Closing entry for the nonfederal share of wages earned off campus (contra accounts # 6–4, 6–5).

7–5 Regular Job Location and Development (JLD) Expenses Paid to Institution: This expense account is maintained to record payments made to the school for JLD Program expenses. This amount cannot exceed the lesser of $75,000 or 10% of the institution’s FWS authorization for the award year to locate and develop off-campus jobs, including community-service jobs. Jobs located or developed under the program may be for either a for-profit or nonprofit employer. A school is not allowed to use its JLD allocation to locate on-campus service jobs. The federal funds that a school sets aside from its FWS allocation to be used for JLD activities may be used to pay up to 80% of allowable costs. The school must provide the remaining 20% of allowable costs, either in cash or services.
Debit this account for:

- Amounts paid to the school (contra account # 1–1).

Credit this account with:

- Closing entry at the end of the accounting period, the amounts paid to the school during the reporting period (contra account # 6–1).

7–6 Administrative Cost Allowance (ACA) Paid to Institution: This expense account is maintained to record payments made to the school in reimbursement for administrative expenses. Such payments to the school have totals limited by regulations, and they may not be made from FWS funds unless students earned FWS wages during the award year.

Debit this account for:

- Payments to school for administrative expenses (contra account # 1–1).

Credit this account with:

- Closing entry at the end of the accounting period, the total amount paid to the school during the reporting period (contra account # 6–1).

Direct Loan Accounts

1–1 Cash, Direct Loans: All receipts and disbursements of cash related to the Direct Loan Program are recorded in this account.

Debit this account for:

- Transfers from G5 accounts (contra account # 6–1).
- Recoveries from recipients (contra account # 7–1).

Credit this account for:

- Payments to students (contra account # 7–1).
- Return of excess cash to G5 via Fedwire or ACH (contra account # 6–1).

1–2 Accounts Receivable, G5: This debit balance account controls the transfer of cash directly from the G5 account established for Direct Loans.

Debit this account for:

- Amounts due from G5 for disbursement needs for the period (contra account # 6–1).
- Return of excess cash (contra account # 1–1).
Credit this account with:

- Cash transferred directly from the G5 account (contra account # 1–1).

6–1 Income from G5—Direct Loans: This credit balance account reflects the income from the Direct Loan Program. This amount is not a transfer from the G5 account referred to in section 5.3. These separate accounts allow for reconciliation with the institution’s records as part of the Direct Loan reconciliation process.

Debit this account for:

- Closing entry at end of accounting fiscal year, the income from G5 to meet disbursement needs for the period (contra accounts # 7–1, 7–2).

Credit this account with:

- Income from G5 recorded to meet current disbursement needs (contra account # 1–2).

7–1 Funds Advanced to Borrowers: This debit balance account is maintained to record payments made to students or parents for loans. This account may be further subdivided to separate disbursements for PLUS, subsidized, and unsubsidized loans.

Debit this account for:

- Loan payments made to students or students’ parents (contra account # 1–1).

Credit this account with:

- Recoveries from loan recipients (contra account # 1–1).
- Closing entry at end of accounting fiscal year for the total amount of loan disbursements made to students or students’ parents for the accounting period (contra account # 6–1).

Federal TEACH Grant Accounts

1–1 Cash, Federal TEACH Grants: All receipts and disbursements of cash related to the TEACH Grant Program are recorded in this account. Typically, this account would show a zero balance after each period’s entries are posted, as the transfer of funds from G5 should equal only the amount of grants to be paid immediately to students.

Debit this account for:

- Transfers from G5 account (contra account # 6–1).
- Recoveries from recipients (contra account # 7–1).
Credit this account with:

- Payments to students (contra account # 7–1).

6–1 Transfer from G5—Federal TEACH Grants for Students: This credit balance account controls the transfer of cash from the G5 account “Cash Control, G5” to the TEACH Grant account “Cash, Federal TEACH Grants.” Such cash transfers should be made only in the precise amounts needed immediately to pay grants to students.

Debit this account for:

- Closing entry at end of accounting fiscal year, the total amount of cash transferred from G5 account to meet disbursement needs for the period (contra account # 7–1).

Credit this account with:

- Cash transferred from G5 account to meet current disbursement needs (contra account # 1–1).

7–1 Student Grants Paid—Federal TEACH Grant: This debit balance account is maintained to record payments made to students for TEACH Grants.

Debit this account for:

- Grant payments made to students (contra account # 1–1).

Credit this account with:

- Recoveries from recipients (contra account # 1–1).
- Closing entry at end of accounting fiscal year for the total amount of grant payments made to students for the accounting period (contra account # 6–1).

**Federal Iraq and Afghanistan Service Grant Accounts**

1–1 Cash, Federal Iraq and Afghanistan Service Grants: All receipts and disbursements of cash related to the Iraq and Afghanistan Service Grant Program are recorded in this account. Typically, this account would show a zero balance after each period’s entries are posted, as the transfer of funds from G5 should equal only the amount of grants to be paid immediately to students.

Debit this account for:

- Transfers from G5 account (contra account # 6–1).
- Recoveries from recipients (contra account # 7–1).
Credit this account with:

- Payments to students (contra account # 7–1).

6–1 Transfer from G5—Federal Iraq and Afghanistan Service Grants for Students: This credit balance account controls the transfer of cash from the G5 account “Cash Control, G5” to the Iraq and Afghanistan Service Grant account “Cash, Federal Iraq and Afghanistan Service Grants.” Such cash transfers should be made only in the precise amounts needed immediately to pay grants to students.

Debit this account for:

- Closing entry at end of accounting fiscal year, the total amount of cash transferred from G5 account to meet disbursement needs for the period (contra account # 7–1).

Credit this account with:

- Cash transferred from G5 account to meet current disbursement needs (contra account # 1–1).

7–1 Student Grants Paid—Federal Iraq and Afghanistan Service Grant: This debit balance account is maintained to record payments made to students for Iraq and Afghanistan Service Grants.

Debit this account for:

- Grant payments made to students (contra account # 1–1).

Credit this account with:

- Recoveries from recipients (contra account # 1–1).
- Closing entry at end of accounting fiscal year for the total amount of grant payments made to students for the accounting period (contra account # 6–1).