

Third-Party Servicer	Not a Third-Party Servicer
In General	
<p>Activities, functions, or services performed on behalf of a Title IV eligible institution, from a remote location or on-site at an institution, that ARE considered an aspect of an institution's participation in a Title IV, HEA program and thus are subject to applicable third-party servicer requirements.</p> <p>The institution and servicer are jointly and severally liable to the Department for any violation by a third-party servicer.</p>	<p>Activities, functions, services, or roles that ARE NOT considered an aspect of an institution's participation in any Title IV, HEA program and therefore are not subject to third-party servicer requirements.</p> <p>The institution will be held solely responsible for any liability incurred as a result of software deficiencies, cybercrime, incorrect consulting advice, lost or damaged records, or servicer violations.</p>
Type of Employment	
<p>An external entity or individual providing financial aid staffing and/or Title IV processing support.</p>	<p>An employee of an institution, <u>if</u> the employee is paid directly by the institution; performs all duties under institution supervision; is not employed by or associated with a third-party servicer; is not a third-party servicer for any other institution; and does not perform Title IV functions or services on behalf of another institution.</p> <p>Entities or individuals hired to review and/or revise an institution's policies and procedures to correct compliance deficiencies or to make recommendations for improvement.</p> <p>Entities or individuals hired to publish an institution's policies, procedures, handbooks, disclosures, etc. via print format, audio format, video format, and/or online.</p> <p>Entities or individuals hired to perform financial and compliance auditing, including preparation of financial statements.</p> <p>Entities or individuals assisting an institution in completing and/or submitting its response to a program review, audit, or investigation.</p>
<p>An external entity or individual providing financial aid management support, either interim or long-term, to direct, guide, provide leadership, or otherwise oversee the operations of the Title IV programs and/or financial aid staff, including development, implementation, and/or maintenance of the written policies and procedures for the Title IV services and functions performed on behalf of or in conjunction with the institution.</p>	
<p>An external entity or individual accessing Department systems (NSLDS, COD, CPS, etc.) that contain personally identifiable student information, and/or accessing personally identifiable student information downloaded from a Department system to perform any Title IV function or service on behalf of an eligible institution.</p>	

	Local or federal law enforcement agencies, fire departments, and/or other public safety agencies providing campus crime awareness and/or drug and alcohol prevention services.
Student and Institutional Eligibility	
Determining student eligibility and related activities, such as completing verification, performing satisfactory academic progress evaluations, determining award amounts, performing Return of Title IV aid calculations, and/or reconciling Title IV program accounts.	No exclusions.
Processing, certifying, originating, and/or approving Title IV award packages and/or disbursements, including requests for advanced or reimbursement funding.	
Preparing/submitted required applications or reports, such as an institution's Application for Approval to Participate in the Federal Student Financial Aid Programs (E-App), or its Fiscal Operations Report and Application for Participation (FISAP), Integrated Postsecondary Education Data System (IPEDS) reports, Campus Safety and Security data reports, and/or enrollment status and/or gainful employment reporting to the National Student Loan Data System (NSLDS).	

General Financial Aid Counseling and Application-Related Activities	
<p>Processing student financial aid applications, including FAFSA or pre-FAFSA completion services.</p>	<p>Community awareness/public service FAFSA completion events and/or general financial aid presentations open to the public and not limited or restricted to attendance at a specific institution or institutions (i.e. College Goal Sunday).</p>
<p>Performing interactive financial aid counseling in person, over the phone, and/or by electronic means. Includes operation of call centers to assist students through the financial aid processes necessary to award and disburse Title IV funds.</p>	<p>Publishing and/or mailing general student financial aid information, policies, procedures, or handbooks prepared by the institution via print format, audio format, video format, and/or online.</p>
Consumer Information Preparation	
<p>Preparing required consumer information disclosures, such as:</p> <ul style="list-style-type: none"> • A Security Report (including crime statistics, timely warnings and emergency notification, crime log, and emergency response and evacuation procedures) • A biennial review of drug and alcohol abuse prevention programs • Graduation and transfer rates • Job placement rates, and/or gainful employment disclosures • Entrance/Exit Loan counseling • A preferred lender list 	<p>Campus crime awareness and/or drug and alcohol Prevention informational meetings, instructional curriculum or programming, and/or public awareness campaigns/events that are open to the public and not limited to or restricted to attendance at a specific institution or institutions.</p> <p>This exclusion does not apply if an institution requires attendance at an event or completion of training to comply with any Title IV requirement (Campus Crime and Security Act, Violence Against Women Act, Drug and Alcohol policy requirements, etc.)</p>
	<p>Local or federal law enforcement agencies, fire departments, and/or other public safety agencies providing campus crime awareness and/or drug and alcohol prevention services.</p>
	<p>Publishing and/or distributing an institution's consumer information disclosures via print format, audio format, video format, and or/online.</p>

Default Aversion	
<p>Performing default prevention/aversion activities, such as contacting student loan borrowers to discuss repayment options or borrower account history, assisting with completion and/or collection of borrower deferment or forbearance forms, performing entrance/exit loan counseling, implementation and oversight of a written default management plan, and /or accessing borrower information contained in Department systems.</p>	<p>Financial literacy curriculum or programming, workshops, and/or public awareness campaigns/events open to Title IV and non-Title IV recipients.</p> <p>This exclusion does not apply if an institution requires its students to attend a financial literacy event or complete financial literacy training or counseling to satisfy the institution's exit loan counseling or other Title IV requirements.</p>
Delivery of Title IV Funds	
<p>Cash management functions, including, but not limited to: collecting student credit balance disbursement preferences; providing terms and conditions and/or disclosure statements relative to the disbursement preference options available to a student or parent; collecting the financial account information necessary to initiate an electronic funds transfer (EFT) or ACH of Title IV funds to a financial account designated by the student or parent for the receipt of those funds; notifying students of the disbursement of Title IV funds and/or the delivery of credit balance refunds; receiving and processing of electronic files (disbursement file, payment instructions, fund wire) to print and mail credit balance refund checks and/or deliver Title IV credit balance refunds to students or parents via ACH, debit card, or other electronic means. Also includes monitoring of undeliverable and/or un-negotiated checks or rejected ACH or EFT transactions.</p>	<p>Tier 2 arrangements as described in 34 CFR 668.164(f).</p> <p>Direct ACH transactions between an institution's treasury account and an account designated by a student for receipt of Title IV funds.</p> <p>Mailing of checks produced by the institution.</p>

Providing Computer Services/Software and/or Maintenance of Records	
<p>Collecting, reviewing, and/or maintaining supporting documentation necessary in person, by mail, or by electronic means to determine or support student eligibility determinations and/or to disburse or deliver Title IV funds to a student or borrower. This includes information necessary to validate information reported on a student's FAFSA and/or to resolve conflicting information, as well as collecting student disbursement preference information for the delivery of Title IV credit balance refunds.</p>	<p>Warehousing of records.</p> <p>Providing computer services or software, as long as the provider is not responsible for using the software for the institution's student aid purposes.</p> <p>The exclusion for "providing computer services or software" does not apply if the provider performs any Title IV activity on behalf of the institution within the system through remote or automated processing and/or if the provider uses or has view or update access to any student-level information needed for the determination of Title IV eligibility maintained in the system (i.e. enrollment, registration, academic records, attendance, financial aid, etc.)</p> <p>Similarly, the exclusion for the "warehousing of records" is restricted to the storage of Title IV-related records and does not apply if the entity performs any Title IV activity on behalf of the institution within the data storage or hosted environment, such as remote or automated processing, and/or the entity has view or update access to any student level information (i.e. enrollment, registration, academic, attendance, financial aid, etc.) within the hosted environment.</p>
Other	
<p>Perkins loan servicing or collection.</p>	<p>None</p>