**Q&A BO21: Top 10 Compliance Findings**

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| Question | Response |
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| How far back to do need to retain R2T4 calculation records | Thanks for your question. Program records relating to the period covered by the program review must be retained until the later of: resolution of the loans, claims or expenditures questioned in the program review; or the end of the retention period otherwise applicable to the record under 34 CFR § 668.24(e). Please also see Vol. 2, Ch 7 of the FSA Handbook. |
| Since this number one finding is often performed by Registrars, will you all be doing this type of session at AACRAO? It is needed. | Thank you for your question. Title IV administration involves many offices at the institution. Feel free to share this information with your registrar offices. Student Enrollment training will be developed in the near future. |
| We are a small clock-hour school; and a few years ago, whenever I originated a new student's Pell & Loans in ED Express and exported it to COD, it would then get picked up by NSLDS immediately. Unfortunately, this changed and now I have to manually add all new students into the Enrollment Roster, and if the student never had any FSA Aid in the past, I cannot add them until after the 1st disbursement. If possible, it would be great if we can add new students even before they receive the first disbursement. | Thank you for your message. Please visit the Conference Resource Center to speak with an EDESuite expert to see if this issue can be resolved. |
| When a student starts school as a cash student with no prior FA history, does this student need to be added to the enrollment reporting in NSLD? If the student decides to use FA in the middle of the program and it's been more than 60 days since the start date, is this going to be considered a late enrollment reporting? | Thank you for your question. Please visit the Conference Resource Center to speak with an NSLDS expert who can answer your question about adding students. The 60 day deadline is for completing the enrollment roster. |
| Is the future Student Enrollment training being offered by FSA or AACRAO? | FSA will be developing student enrollment training in the near future. Members of AACRAO may wish to request the training once it is available. |
| Does the R2T4 calculation itself have to be done within 30 days? | Thank you for your question. The R2T4 must be done within 30 days of withdrawal and and required funds returned within 45 days. |
| I know you need to complete an R2T4 for a student who withdrawals after the 60% for the student file but do I need to report it anywhere other than my ERR report? | Thank you for your question. The R2T4 calculated after the 60% point is only to determine any Post Withdrawal Disbursements. It should be retained in the student's file. |
| When a student officially withdraws and all aid for the semester has disbursed (and there is no post-withdrawal disbursement involved because all aid has disbursed), do schools have 30 days to perform the R2T4 calc and 45 days to return the funds or 45 days to complete the R2T4 calc and return the funds? | Thank you for your question. The R2T4 must be completed within 30 days and any required funds to be returned in 45 days. |
| Will the presentation videos be available to download in order to share? Or must others have a log in if they did not attend the conference | These presentations and videos will be publicly available at https://fsaconferences.ed.gov/ - past conference sessions and presentations are also available at the same address. No log in required. |
| What is considered conflicting information in the verification process? some specific examples please | Thank you for your message. Please review the information in the 2020-21 Federal Student Aid Handbook, Application and Verification Guide, Chapter 5: Special Cases, for more information on conflicting information. https://ifap.ed.gov/federal-student-aid-handbook/2021FSAHbkAVG |
| When does ED consider the funds returned, is it the date that is on COD or the date funds are moved on G5? | Thank you for your question. It is the date that the funds are returned to G5. |
| What do we do if we miss the 30- and 45-day deadlines for R2T4s on unofficial withdrawals? | Thank you for your question. The 30- and 45-day deadline dates beginning on the date of determination that the student withdrew. So if you do not find out that a student unofficially withdrew until the end of the term, for example, May 15th, then you would need to calculate R2T4 no later than 30 days from May 15th, and return any funds no later than 45 days after May 15. |
| How about conflicting information received after verified and disbursement of funds? | Thank you for your question. Schools are required to resolve any conflicting information regardless of when it is discovered. |
| What is something used to resolve a #400 /#401 comment flag? IF the taxes have been linked on all consecutive isirs, is that sufficient evidence of income being correct? | Thank you for your question. Please visit the Conference Resource Center and speak with a Training Officer in AskAFed. If you do not have the time today, please email AskAFed@ed.gov next week and we will answer your question. |
| What is straight edge tool for reviewing taxes | Thank you for your question. Any tool that will help you keep a straight-line view, such as a ruler. |
| What is the date to use for withdrawn students in enrollment reporting: Last day of attendance or date of determination? | The last date of attendance is reported. |
| We recently had a finding for untimely Enrollment Status Reporting because we did not respond to the roster files within 15 days. In every training I've been in, they've only mentioned the 60 day window to respond, which was repeated again today, even though this is the top compliance finding. Trainings need to be updated to include the 15 day roster file response requirement as well. Or is there something I can tell our auditor that is different? | Thank you for your question. NSLDS sends the roster every 60 days, but the school/servicer must certify the info and return the roster within 15 days of receiving it. See the 2019-20 Federal Student Aid Handbook, Vol 2, Ch 3 p. 2-66. We encourage you to contact the Audit Resolution Specialist in your regional School Participation Division should you wish to discuss this finding. |
| Do exit counseling material have to be mailed as indicated on the slide if they failed to do it? I thought we could email the notice and the materials to them. | Exit counseling notices and materials may be emailed to students. Please be sure they are sent to an email address other than the student's school email. |
| Is it accurate that schools can sent the link to ED"s exit counseling rather than sent a PDF via email or a paper materials? | Yes. And be please sure it is sent to an email address other than the student's school email. |
| Can we withhold issuing a diploma to a student who does not complete exit counseling? | Thank you for your question. A school could have a policy of requiring exit counseling as a graduation requirement. But it must be applied equally to all students. Since the requirement of exit counseling can be met by mailing the documents to the students last know personal e-mail or home address, most schools choose this option and would release the diploma. |
| When a student who is selected for verification withdraws, do we still do the R2T4 within 30 days or do we wait for verification to be done? | Thank you for your question. Verification and R2T4 is discussed in the 2020-21 Federal Student Aid Handbook, Volume 5, Chapter 1, beginning on page 5-10. Please email the AskAFed mailbox at AskAFed@ed.gov if you have questions after reviewing the Handbook. |
| Where can we get the Direct Loan Exit Counseling Guide? | The Guide is available at https://studentaid.gov/sites/default/files/loan-exit-counseling.pdf |
| Does a stuent have to complete exit counselling if they graduate from a 3 year degree program at the end of fall term before starting a new 4 year program in the subsequent term? | The regulations state that exit counseling must be completed shortly before the student borrower ceases at least half-time study at the school. Because the student intends to return, exit counseling would not be required at the time of graduation. Of course, if the student does not return as planned, exit counseling should then be provided. |
| If we email a student the exit counseling material but the student does not complete it are we required to mail the documents? | Thank you for your question. If the student is not available for in-person exit counseling, the school can mail all required documents and annotate the student's file to that effect. This meets the requirement for exit counseling. |
| If a student previously reveived aid at another school, and didn't complete exit counseling, do we need to do anything? | Thank you for your question. You are not required to do anything, but you could encourage the student to complete exit counseling, or you could encourage the student to complete another entrance counseling session at your institution. You can also check that the student's prior loans are in deferment. An informed borrower is less likely to default. |
| For unofficial withdrawals, those final grades won't be posted until 12/24. The University will be closed 12/23. Does the countdown begin 12/24 or when we return from winter break and run the reports, in January? | The institution won't know if the student has withdrawn until the student fails to attend in the spring; it is important to have a strong process to identify unofficial withdrawals and no-shows at the start of a term, no matter if your institution is required to take attendance; the date of determination would be set by your process in the spring, and R2T4 clock would begin at the DoD; LDA 12/23 |
| Can a student be emailed notifications regarding return of title IV funds? | Thank you for your question. Yes, students may receive notification regarding their return of funds via email, and you should consider sending the information via personal email, using the same requirement for sending exit counseling information. |
| Great Presentation and I appreciate the resource section for reference. | Thank you so much! The full PPT that includes the resources is posted on fsaconferences.ed.gov. |
| Where is the list of resources that were going to be given at end? | Please use the link below for the full length PowerPoint that includes the Resources section: https://fsaconferences.ed.gov/conferences/library/2020/2020FSAConfSessionBO21.pdf |
| What were those resources at the end? I didn't see a slide for them. Thanks! Fantastic presentation! | Please use the link below for the full length PowerPoint that includes the Resources section: https://fsaconferences.ed.gov/conferences/library/2020/2020FSAConfSessionBO21.pdf |
| Where are the resources mentioned at the end of the presentation? | Please use the link below for the full length PowerPoint that includes the Resources section: https://fsaconferences.ed.gov/conferences/library/2020/2020FSAConfSessionBO21.pdf |
| I don't see the 2 sets of resources she mentioned at the end of the presentation? Is that elsehwere on the site, or in the pdf slideshow? | Please use the link below for the full length PowerPoint that includes the Resources section: https://fsaconferences.ed.gov/conferences/library/2020/2020FSAConfSessionBO21.pdf |
| If we have a loan disbursement with additional sequence numbers, which disbursement date should be stored in COD? | Thank you for your question. Please visit the Conference Resource Center to speak with a COD expert for assistance. |
| Is it required to store ISIRs in the student's record? | Thank you for your question. All ISIRS are to be stored in the students record either hard copy or electronic. |
| Where can we find exit counseling materials? | Thank you for your question. Many schools use the Direct Loan Exit Counseling Guide on studentaid.gov: https://studentaid.gov/sites/default/files/loan-exit-counseling.pdf.   You can find additional materials on IFAP's Default Prevention Resource Information page: https://ifap.ed.gov/default-prevention-resource-information. |
| What are all the dates or number of days that are associated with R2T4? how many days to do R2T4 from date of determination? How many days to return funds? How many days to notify students of return? | 30 days: Provide written notification to the student or parent of a post-withdrawal disbursement of loan funds within 30 days of the date of determination that the student withdrew.  45 days: Return unearned Title IV funds as soon as possible, but no later than 45 days after the date of determination. 30 days: Notify a student of a grant overpayment. Send other notifications as soon as possible. |
| What's the definition of administrative capability? How is this determined? Is it just the director's ability or the entire financial aid department? | Administrative capability means that an institution must demonstrate to ED that it is administratively capable of providing the education it promises, and of properly managing the FSA programs. The requirements of administrative capability are outlined in the regulations, 34 CFR 668.16 & described in the Federal Student Aid Handbook, Volume 2, Chapter 3. It is an institution-wide responsibility. |
| What are all the number of days associated with a R2T4? 30 days for? 45 days for? | 30 days: Provide written notification to the student or parent of a post-withdrawal disbursement of loan funds within 30 days of the date of determination that the student withdrew.  45 days: Return unearned Title IV funds as soon as possible, but no later than 45 days after the date of determination. 30 days: Notify a student of a grant overpayment. Send other notifications as soon as possible. |
| Is there a good resource for R2T4 deadlines? | Yes. There is a helpful chart in the 2020-21 Federal Student Aid Handbook, Volume 5, Chapter 2, on page 5-123: “Return of Title IV Funds Requirements and Deadlines”. https://ifap.ed.gov/federal-student-aid-handbook/2021FSAHbkVol5 |
| The Program Review is usually done for the actual and the recent closed year. For how long should we mantain the ISIR evidence in our records and should we only have the ISIR for which the transaction was paid or all the ISIR's of that student (the ones that had errors, etc)? | Thanks for your question. Program records relating to the period covered by the program review must be retained until the later of: resolution of the loans, claims or expenditures questioned in the program review; or the end of the retention period otherwise applicable to the record under 34 CFR § 668.24(e). And schools should retain all ISIRs in the form in which they were originally received. |