

Session 13: The FSA Assessments - Find it, Fix it, Enhance Compliance

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Training Objectives

Locate Assessments

Tools for Schools

Click on this box to access online and computer-based training resources.

Tools for Schools

- [COD Computer-Based Training](#)
- [Conference Presentations](#)
- [EDEXpress Online Training \(WBT\)](#)
- [Campus-Based Computer-Based Training](#)
- [FSA Assessments](#)
- [FSA COACH \(Web Based Training\)](#)
- [ISIR Analysis Tool](#)
- [Net Price Calculator](#)

IFAP – Select Tools for Schools

Select FSA Assessments Link



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FSA Assessments

In collaboration with financial aid professionals, Federal Student Aid has designed the FSA Assessments to help schools with compliance and improvement activities. The assessments contain links to applicable laws and regulations. The [FAQ page](#) provides guidance on how to navigate and begin using the FSA Assessments.

| Students | Schools |
|---|---|
| <ul style="list-style-type: none"> Student Eligibility Satisfactory Academic Progress Verification | <ul style="list-style-type: none"> A Guide to Creating a Policies and Procedures Manual Automation Consumer Information Default Prevention & Management Fiscal Management Institutional Eligibility Return of Title IV Funds |
| Campus-Based Programs | Innovations |

[FSEOG](#)

[FWS](#)

Perkins:

- [Awarding & Disbursement](#)
- [Cancellation](#)
- [Due Diligence](#)
- [Forbearance & Deferment](#)
- [Repayment](#)



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FSA Assessments FAQs

What Assessments should I complete?

A school determines the assessments to complete. We recommend that you complete Assessments related to prior audit or program review findings. If you have none, you may want to view the FSA Assessments chart to help you choose the FSA Assessments to complete [FSA Assessments Chart](#)

What hyperlinks are provided throughout the Assessments?

When available and applicable, hyperlinks to Federal Regulations, Federal Student Aid Handbook, Web sites and Dear Colleague Letters are provided.



FSA Assessments Chart

| Reason | Assessment | Options |
|--|---|---|
| <p>Deficient Audit</p> <p>Example: Satisfactory Academic Progress policy not adequately monitored.</p> | <p>Complete all activities within the <u>Satisfactory Academic Progress (SAP)</u> assessment.</p> <p>It is recommended that an <u>Action Plan</u> is completed to track progress and ensure <u>Policies and Procedures</u> are updated.</p> <p>Since SAP is related to other Student Eligibility issues, another assessment to be considered for completion is the <u>Student Eligibility</u> assessment.</p> | <p>The school has the option to choose which award year to review. The school may decide to review files from prior award years, but may also want to determine whether a particular deficiency is recurring to ensure that it has been resolved in the most recent award year.</p> |



Recertification Process

- The process
- Institutional Eligibility Assessment

Fiscal Reconciliation

- Funds not Reconciled
- Fiscal Management Assessment

School Participation Team Visit/Program Review Deficiencies

- Additional Locations
- Institutional Eligibility Assessment, Activity 4

No Action or Deficiencies

- Complete Two Assessments
- Policies and Procedures



Why Use the Assessments?

- **Assess compliance**
- **Link to Title IV regulations and other resources**
- **Track your action plan**

Assessment Design

➤ Page Layout

- Links
- Action Plan
- Activity Bar

Consumer Information

This assessment describes the requirements for the consumer information that a school must provide to students, the Department, and others.

Review the [Consumer Information Disclosures at a Glance](#) document that provides a summary of school disclosure requirements.

If you identify areas requiring a corrective action, we recommend that you complete an [Action Plan](#).

Activity Bar:

[Consumer Information Activity 1: Institutional and Financial Assistance Information for Students](#)

[Consumer Information Activity 2: Drug & Alcohol Prevention](#)

[Consumer Information Activity 3: Consumer Information for Student Athletes](#)

[Consumer Information Activity 4: Student Right-to-Know Act](#)

[Consumer Information Activity 5: Clery/Campus Security Act](#)

[Consumer Information Activity 6: FERPA](#)

[Consumer Information Activity 7: Safeguarding Customer Information](#)

[Consumer Information Activity 8: Fire Safety Reports and Student Housing](#)

[Consumer Information Activity 9: Misrepresentation](#)

[Consumer Information Activity 10: Loan Disclosures](#)

Additional Links: [2010-11 FSA Handbook, School Eligibility & Operations, Chapter 6; Chapter 7 and Chapter 8; Handbook for Campus Crime Reporting](#)



Assessment Design

➤ Page Layout

➤ Topic

➤ Regulation

➤ Activity

Please note the regulatory citations are referenced in the first column of the assessment. To link to any of the regulatory references, click on the link in the regulatory link column and scroll down to the applicable section.

| Consumer Information | Regulatory Link(s) | Activity |
|---|-------------------------------|--|
| Method of Disclosure: 668.41(b)(c); 668.44 | 34 CFR 86 | Consumer Information Activity 1: Institutional and Financial Assistance Information for Students |
| Financial Assistance Information: 668.42 | 34 CFR 99 | |
| Institutional Information: 668.43 | 34 CFR 99.31 | |
| <ul style="list-style-type: none"> • Required Information about the School 668.43 • Net Price Calculator DCL GEN 08-12; Net Price Calculator • Vaccination Policy DCL GEN 08-12; 20 U.S.C. 1092(a)(1) • Copyright Information 668.43(a)(10) | 34 CFR 99.36 | |
| Other Institutional Information: DCL GEN 08-12 | 34 CFR 601.2 | |
| <ul style="list-style-type: none"> • Penalties associated with drug-related offenses • College Navigator Website • Student Body Diversity • Textbook information • Teacher Preparation Program Report • Voter Registration Form | 34 CFR 601.10 | |
| Availability of Employee for Dissemination Purposes: 668.48 | 34 CFR 601.11 | |
| Constitution and Citizenship Day: Federal Register 5/24/2005 | 34 CFR 601.12 | |
| Drug and Alcohol Abuse Prevention Information: 668.14; the Drug-Free Schools and Communities Act ; Public Law 101-226 | 34 CFR 601.20 | |
| | 34 CFR 601.21 | |
| | 34 CFR 601.30 | Consumer Information Activity 2: Drug & Alcohol Prevention |
| | 34 CFR 668.6 | |
| | 34 CFR 668.7 | |
| | 34 CFR 668.14 | |



Find

- Identify an Assessment
- Complete the Assessment

Fix

- Identify area of Improvement
- Develop Action Plan

Enhance

- Implement Changes
- Review Annually



Identify FSA Assessment



- Consumer Information Assessment
- A Guide to Creating a Policies & Procedures Manual

Scenario

The school provides required Consumer Information disclosures on their website but no subsequent notice to students.

- Does this satisfy the regulatory requirements?
- Complete the Consumer Information Assessment to find out

Consumer Information

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Additional Links: [2010-11 FSA Handbook, School Eligibility & Operations, Chapter 6; Chapter 7 and Chapter 8; Handbook for Campus Crime Reporting](#)



Scenario

The school provides required Consumer Information disclosures on its website but no subsequent notice to students.

Activity 1

This Activity covers the following topics:

- ❑ Method of Disclosure [668.41\(b\)\(c\)](#)
- ❑ Financial Assistance Information [668.42](#)
- ❑ Institutional Information [668.43](#)
- ❑ Availability of Employees for Information dissemination purposes [668.44](#)
- ❑ Constitution and Citizenship Day [Federal Register 5/24/2005](#)

Review and record what office is responsible for reviewing and updating the information listed below. Also indicate where this information is located and when it was last updated.

Topic – Method of Disclosure [668.41\(b\)\(c\)](#)

| | |
|---|--|
| Office Responsible: | |
| Area Information is located: | |
| Date Document was last updated: | |
| Date Policy and Procedure was last updated: | |

Method of Disclosure [668.41\(b\)\(c\)](#):

A school must annually provide a NOTICE directly (one-on-one distribution) to all enrolled students describing the availability of the required consumer information. The notice must contain a brief description of the various disclosures and how to obtain the full disclosures. If a disclosure is posted to a website, the notice must provide the exact electronic address and provide a statement that paper copies are available.

Scenario

The school provides required Consumer Information disclosures on its website but no subsequent notice to students.

A Guide to Creating a Policies & Procedures Manual

| | | |
|----------|----------------------|---|
| Part 3.4 | Consumer Information | This section is required: 601.11 , 601.30 , 668.14 , 668.41 , 668.42 , 668.43 , 668.44 , 668.45 , 668.46 , 668.47 , 668.48 ; 668.49 ; 668.164(j) |
|----------|----------------------|---|

This section includes:

Procedures outlining the requirements for Consumer Information related to specific institutional information, graduation rates, annual security report, and athletic reporting. You should ensure that your procedures include all consumer information requirements. It is a good practice to include a copy of any printed materials as part of your Policies and Procedures. Review the [Consumer Information Disclosures At A Glance](#) document for more information about the required Disclosures.

- **Method of Disclosure [668.41\(b\)\(c\)](#):** A school must annually provide a NOTICE directly (one-on-one distribution) to all enrolled students describing the availability of the required consumer information. The notice must contain a brief description of the various disclosures and how to obtain the full disclosures. If a disclosure is posted to a website, the notice must provide the exact electronic address and provide a statement that paper copies are available.
- **General Disclosures.** Identify publications and how they are distributed (mailing or electronic media) to disclose the following to enrolled or prospective students or employees as outlined in [668.41](#):
 - **Basic financial aid information.** Financial Assistance available to students enrolled in the school pursuant to [668.42](#). Include information about financial assistance that the institution must publish and make readily available to current and prospective students. The information must include, but is not limited to, a description of all the Federal, State, local, private and institutional student financial assistance programs available to students who enroll at the institution. (Refer to [Consumer Information Activity 1](#))
 - **General information about the school outlined in [668.43](#).** Include institutional information that must be made readily available upon request to enrolled and prospective students. (Refer to [Consumer Information Activity 1](#))



Assessment



- Identify Improvement
- Identify Corrective Action

Consumer Information

- Improvement area: Consumer information disclosures
- Corrective Action: Develop notice, notify students, and provide hard copy upon request



- Complete Action Plan
- Implement Action Plan

- Complete Action Plan
- Implement Action Plan
- Review Process

Locate Action Plan

A Guide to Creating a Policies & Procedures Manual

This assessment outlines the minimum policies and procedures requirements for administering Title IV Aid.

[Policies and Procedures Activities At-A-Glance](#) identifies areas outlined in the law and regulations that require a written policy and procedure and also provides links to the regulations. If you identify areas requiring a corrective action, we recommend that you complete an [Action Plan](#).

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Action Plan



What assessment is this enhancement item related to? Consumer Information

Action Item: (Provide a detailed description of the policy, procedure or system that needs to be improved)

Write the Notice. Notice must include the web address where the disclosures are located, and that hard copies are available upon request. Notify students that the required Consumer Information Disclosures are available on the website, provide the actual link to the website, and notify students that paper copies are available upon request.

Action Plan: (Provide a detailed description of your plan of action to improve the above enhancement item)

Determine how to notify student via school email address, dorm, or home address. First, we send written notice to students who have a school email address. If the student does not have a school email address, we send written notice to dorm. If the student is not in a dorm, written notice is sent to address on file from FAFSA.

Offices that need to be involved:

Financial Aid Office, Registrar, Admissions Office

Lead Persons to Coordinate Action Plan:

Name: Find It

Title: Financial Aid Coordinator

Phone Number: (999)999-9999

Name: Fix It

Title: Financial Aid Coordinator

Phone Number: (999)999-9999



Near-Term Enhancement? Yes No

Long-Term Enhancement? Yes No

Start Date (mm/dd/yy): 10/28/2011

Anticipated Completion Date: 12/28/2011

Actual Completion Date: 11/29/2011

After implementation, explain the final results:

Sent out all written notification. Followed up with all returned mail for non-sufficient address. We investigated the addresses with Registrar and Admissions Office to locate student. The revised policy has been updated, published and shared with staff and students.

Did you update your Policies and Procedures Manual to reflect changes made as a result of the action plan implemented?

1. Yes No

2. Section Updated: *Consumer Information*

3. Date Policies and Procedures Manual Updated? (11/29/2011)

Comments:



Potential Findings

Consumer Information Requirements Not Met

Crime Awareness Requirements Not Met

Drug Abuse Prevention Requirements Not Met

Identify FSA Assessment



- Satisfactory Academic Progress (SAP) Assessment
- A Guide to Creating a Policies & Procedures Manual

Scenario

The school reviews SAP annually.

Their SAP policy automatically places a student on financial aid probation if they do not meet SAP.

- Does this satisfy the regulatory requirements?
- Complete the SAP assessment to find out

SAP

➤ Additional Links

➤ Q & A Link

➤ SAP Policies & Procedures

Satisfactory Academic Progress

This assessment provides you with an opportunity to review and evaluate your procedures regarding Satisfactory Academic Progress (SAP).

If you identify areas requiring a corrective action, we recommend that you complete an [Action Plan](#).

Activity Bar:

[SAP Activity 1: SAP File Review Worksheet](#)

Additional Links: [2011-12 FSA Handbook Student Eligibility Chapter 1](#); [2010-11 FSA Handbook School Eligibility & Operations, Chapter 3](#); [Program Integrity Questions & Answers - Satisfactory Academic Progress](#)

| Satisfactory Academic Progress | Regulatory Link(s) | Activity |
|--|-------------------------------|--|
| Administrative Capability 34 CFR 668.16(e) | 34 CFR 668.2 | |
| | 34 CFR 668.16 | |
| | 34 CFR 668.32 | |
| Student Eligibility 34 CFR 668.32 | 34 CFR 668.34 | Satisfactory Academic Progress Policies and Procedures |



Scenario: School's Current Policy

The school reviews SAP annually.

Their SAP policy automatically places a student on financial aid probation if they do not meet SAP.

Program Integrity Q & A - SAP

Financial Aid Probation (PROB)

PROB-Q1: Under what circumstances would a student be placed on SAP probation?

PROB-A1: A student who fails SAP must successfully appeal to be placed on probation. Probation may not be given automatically. At the end of one payment period on probation, the student must make SAP or must be meeting the requirements of the academic plan. [Guidance issued 8/26/2011]

Scenario: School's Current Policy

The school reviews SAP annually.

Their SAP policy automatically places a student on financial aid probation if they do not meet SAP.

SAP Assessment

Part 1.3

Satisfactory Academic Progress Procedure

This section is required
668.16 (e); 668.34

SAP Policy for 2011-12 and beyond

The school must establish, publish and apply reasonable standards for measuring whether an otherwise eligible student is making SAP in their educational program.

For schools that evaluate SAP annually or less frequently than the end of each payment period, the policy must specifically address the following:

- If a student is not making SAP according to the school's policy, the school may place the student on financial aid probation and may disburse Title IV, HEA program funds to the student for the subsequent payment period if –a) the school evaluates that the student is not making satisfactory academic progress; b) the student appeals the determination; and c) the school determines that the student should be able to make satisfactory academic progress during the subsequent payment period and meet the school's satisfactory academic progress standards at the end of that payment period, or the school develops an academic plan for the student that, if followed, will ensure that the student is able to meet the school's satisfactory academic progress standards by a specific point in time.



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Assessment



- Identify Area of Improvement
- Identify Corrective Action Plan

SAP Policies and Procedures

- Improvement area: 2011-12 SAP policy does not reflect new regulatory requirements
- Corrective action: Revise P&P to reflect the requirements for placing students on probation



- Identify Corrective Action
- Complete Action Plan

- Complete Action Plan
- Implement Action Plan
- Review Process

Locate Action Plan

A Guide to Creating a Policies & Procedures Manual

This assessment outlines the minimum policies and procedures requirements for administering Title IV Aid.

[Policies and Procedures Activities At-A-Glance](#) identifies areas outlined in the law and regulations that require a written policy and procedure and also provides links to the regulations. If you identify areas requiring a corrective action, we recommend that you complete an [Action Plan](#).

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Action Plan



What assessment is this enhancement item related to? SAP

Action Item: (Provide a detailed description of the policy, procedure or system that needs to be improved)

Include appeal process before a student is allowed to be placed on probation. School chose to create an appeals form that students complete in order to be considered for probation.

Action Plan: (Provide a detailed description of your plan of action to improve the above enhancement item)

Include an appeal process in the policies and procedures. Since school caught this early in the process there were no students who have yet to be reviewed for SAP. Therefore, no students have been placed on probation for the 2011-12 cycle.

Offices that need to be involved:

Financial Aid Office; Registrar

Lead Persons to Coordinate Action Plan:

Name: Find It

Title: Financial Aid Coordinator

Phone Number: (999)999-9999

Name: Fix It

Title: Assistant Registrar

Phone Number: (999)999-9999



Near-Term Enhancement? Yes No

Long-Term Enhancement? Yes No

Start Date (mm/dd/yy): 10/28/2011

Anticipated Completion Date: 12/28/2011

Actual Completion Date: 11/29/2011

After implementation, explain the final results:

The revised policy has been updated, published and shared with staff and students.

Did you update your Policies and Procedures Manual to reflect changes made as a result of the action plan implemented?

1. Yes No
2. Section Updated: SAP Section
3. Date Policies and Procedures Manual Updated (11/29/2011)

Comments:

We recommend that your school annually review all action plans implemented by the school.



Potential Findings

Satisfactory Academic Policy Not Adequately Developed/Monitored

Ineligible Student: Not Making Satisfactory Academic Progress



Importance of a Manual



Live Demonstration



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What We Have Learned

Find

- IFAP.ED.GOV

Fix

- Select an Assessment
- Complete the Assessment

Enhance

- Complete Action Plan
- Implement and Review Annually



Contact Information

We appreciate your feedback and comments:

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