

SESSION #21

Top 10 Compliance Findings

Effie Barnett

U.S. Department of Education

2020 Virtual FSA Training Conference for Financial Aid Professionals

AGENDA

- 01 Top 10 Compliance Audit and Program Review Findings
- 02 Audit Findings – Causes and Solutions
- 03 Program Review Findings – Causes and Solutions
- 04 Contact Information
- 05 Resources by Top 10 Findings
- 06 Top 10 Resources for Compliance Solutions

TOP 10 COMPLIANCE AUDIT AND PROGRAM REVIEW FINDINGS

TOP 10 COMPLIANCE AUDIT FINDINGS

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1. Student Status – Inaccurate/Untimely Reporting
2. Repeat Finding – Failure to Take Corrective Action
3. Return of Title IV (R2T4) Calculation Errors
4. Return of Title IV (R2T4) Funds Made Late
5. Verification Violations

TOP 10 COMPLIANCE AUDIT FINDINGS

6. Qualified Auditor's Opinion Cited in Audit
7. Student Credit Balance Deficiencies
8. Entrance/Exit Counseling Deficiencies
9. G5 Expenditures Untimely/Incorrectly Reported
10. Pell Grants – Overpayment/Underpayment

TOP 10 PROGRAM REVIEW FINDINGS

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1. Student Status – Inaccurate/Untimely Reporting
2. Return to Title IV (R2T4) Calculation Errors
3. Entrance/Exit Counseling Deficiencies
4. Verification Violations
5. Consumer Information Requirements Not Met

TOP 10 PROGRAM REVIEW FINDINGS

6. Satisfactory Academic Progress Policy Not Adequately Developed/Monitored
7. Student Credit Balance Deficiencies
8. Lack of Administrative Capability
9. Account Records Inadequate/Not Reconciled
10. Crime Awareness Requirements Not Met

TOP 10 COMPLIANCE AUDIT AND PROGRAM REVIEW *SHARED FINDINGS*

SHARED FINDINGS

- Student Status – Inaccurate/Untimely Reporting
- Return to *Title IV* (R2T4) Calculation Errors
- Verification Violations
- Student Credit Balance Deficiencies
- Entrance/Exit Counseling Deficiencies

Compliance Audit Findings



STUDENT STATUS – INACCURATE/UNTIMELY REPORTING

- Inaccurate reporting of enrollment status and effective dates
- Failure to report last date of attendance/changes in student enrollment status
- Inaccurate reporting of program–level data
- Untimely reporting of specific student information
- Untimely submission of NSLDS® Roster file

Regulation: 34 C.F.R. § 685.309(b)

ENROLLMENT REPORTING SOLUTIONS

- Establish electronic enrollment reporting schedule
- Implement process to track and monitor enrollment status changes
- Train staff on reporting requirements and procedures
- Create or strengthen institutional policies and procedures
- Originate loans as early as possible
- Add students to transfer monitoring

REPEAT FINDING – FAILURE TO TAKE CORRECTIVE ACTION

- Failure to implement Corrective Action Plan (CAP)
- Instances of noncompliance unresolved by CAP
- Ineffective CAP used from previous year(s)
- Internal controls inadequate to ensure compliance with FSA guidelines

Regulations: 34 C.F.R. §§ 668.16 and 668.174(a)

REPEAT FINDING SOLUTIONS

- Create effective Corrective Action Plan (CAP)
- Share CAP with all accountable offices
- Assign CAP monitoring responsibilities to specific staff
- Establish target dates to review CAP effectiveness
- Create new policies and procedures
- Train staff on required processes

R2T4 CALCULATION ERRORS

- Incorrect number of days used in term/payment period
- Incorrect clock-hours used in payment period
- Incorrect withdrawal date
- Incorrect aid used as “could have been disbursed”
- Incorrect Post-Withdrawal Disbursement
- Mathematical and rounding errors
- Incomplete R2T4 policy

Regulation: 34 C.F.R. § 668.22

R2T4 CALCULATION SOLUTIONS

- Establish correct academic calendar in online R2T4 calculator
- Create scheduled hours chart for programs
- Verify withdrawal date and date of determination
- Provide correct information to Third-Party Servicer
- Develop/Evaluate R2T4 policies and procedures
- Train staff on R2T4 calculations
- Create peer review system to check for accuracy
- Review R2T4 consumer information policy

R2T4 FUNDS MADE LATE

- Returns not made within 45-day allowable time frame
 - School's policy and procedures not followed
 - Inadequate system in place to identify/track official and unofficial withdrawals
 - No system in place to track number of days remaining to return funds

Regulations: 34 C.F.R. §§ 668.22(a)(6), (j), and 668.173(b), (c), (d)

TIMELY RETURN OF FUNDS SOLUTIONS

- Coordinate student withdrawal process with registrar and student accounts
- Develop R2T4 tracking system
- Develop/evaluate R2T4 policies and procedures
- Develop/evaluate official/unofficial withdrawal policies and procedures
- Train all staff involved in student withdrawal process

VERIFICATION VIOLATIONS

- Inaccurate verification of selected applicants
- Verification documentation missing/incomplete
- Interim disbursement rules not followed
- Conflicting data not resolved
- Missing verification policies

Regulations: 34 C.F.R. §§ 668.51– 668.61 (Subpart E) and 668.16(f)

VERIFICATION SOLUTIONS

- Develop/enhance verification policies and procedures
- Use/create verification checklist
- Use straight edge tool when reviewing tax information
- Resolve conflicting information
- Monitor ISIR corrections processing and status codes
- Create peer review system to check for accuracy
- Develop/review verification consumer information policy

QUALIFIED AUDITOR'S OPINION CITED IN AUDIT

- Anything other than unqualified opinion
- Serious deficiencies/areas of concern in compliance audit/financial statements
 - R2T4 violations
 - Inadequate accounting systems and/or procedures
 - Lack of internal controls

Regulations: 34 C.F.R. §§ 668.16(a)–(c), and 668.171(h)

QUALIFIED AUDITOR'S OPINION SOLUTIONS

- Design institution-wide action plan when necessary
- Implement effective and timely Corrective Action Plan
- Address serious deficiencies using measurable steps
 - Develop correct policies and procedures
 - Provide staff training
 - Peer review system
 - Set milestones for improvements

STUDENT CREDIT BALANCE DEFICIENCIES

- Lack of internal controls to manage credit balance process
- Credit balance not released to student within 14 days
- Credit balances not released by end of loan period or award year
- Unclaimed credit balances not returned
- Inadequate Title IV credit balance authorization

Regulations: 34 C.F.R. §§ 668.164(h) and 668.165(b)

STUDENT CREDIT BALANCE SOLUTIONS

- Establish internal controls to guarantee timely release of funds
- Create policies and procedures that implement requirements
- Train staff responsible for Title IV credit balance refunds
- Conduct periodic self-audits of Title IV credit balance process
- Pay held credit balances before end of loan period or award year
- Review credit balance authorization for all required elements

ENTRANCE/EXIT COUNSELING DEFICIENCIES

- Exit counseling not conducted/documentated for withdrawn students or graduates
- Exit counseling materials not mailed to students who failed to complete counseling
- Exit counseling completed late

Regulation: 34 C.F.R. §§ 668.24(c)(1)(v) and 685.304

ENTRANCE/EXIT COUNSELING SOLUTIONS

- Coordinate student enrollment process with registrar and student accounts
- Post studentaid.gov loan counseling links and requirements on school website
- Make exit counseling requirement for graduation
- Develop system to provide all less-than-half-time and nonattending students exit counseling notification and materials within 30 days
 - Provide materials to students by email or mail
 - Include direct link to or attach *Direct Loan Exit Counseling Guide* and/or other materials when emailing students

G5 EXPENDITURES UNTIMELY/INCORRECTLY REPORTED

- Failure to submit disbursement records to COD within 15 days after making or adjusting disbursements
- Disbursement dates on student ledgers do not match disbursement dates in COD
- Disbursement amounts on student ledger do not match disbursement amounts in COD

Regulations: 34 C.F.R. §§ 668.164, 685.301(c), and 690.83

G5 EXPENDITURES SOLUTIONS

- Develop/enhance disbursement rules policies and procedures
- Submit/adjust COD disbursement records timely
- Immediately update COD estimated disbursement dates when aid is posted to student's account
- Perform periodic reconciliation of disbursement dates and amounts
- Send correct disbursement dates to Third-Party Servicer

PELL GRANT OVERPAYMENT/UNDERPAYMENT

- Incorrect Pell Grant formula
- Inaccurate calculations
 - Proration
 - Incorrect EFC
 - Incorrect number of weeks/hours
- Change in enrollment status

Regulations 34 C.F.R. §§ 690.62-690.63, and 690.79-690.80

PELL GRANT AWARDING SOLUTIONS

- Establish policies and procedures to strengthen awarding process
- Use packaging worksheet or system to document Pell award
 - Scheduled Award
 - Enrollment status *or* clock hours and number of weeks
 - Transfer credits
 - Award proration when necessary
- Implement process to check enrollment status before disbursement
- Train staff on Pell awarding
- Conduct file reviews

Program Review Findings



TOP 10 PROGRAM REVIEW FINDINGS

1. Student Status – Inaccurate/Untimely Reporting
2. Return to Title IV (R2T4) Calculation Errors
3. Entrance/Exit Counseling Deficiencies
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5. Consumer Information Requirements Not Met

TOP 10 PROGRAM REVIEW FINDINGS

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8. Lack of Administrative Capability
9. Account Records Inadequate/Not Reconciled
10. Crime Awareness Requirements Not Met

CONSUMER INFORMATION REQUIREMENTS NOT MET

- Incomplete/missing elements:
 - Institutional financial assistance information
 - Institutional information
 - Health and safety information
 - Disclosures of institutional outcomes
 - FERPA disclosure information
 - NSLDS[®] disclosure information
 - Equity in Athletics information

Regulations: 34 C.F.R. §§ 99.7, 668.41-668.45, and 668.47-668.48

CONSUMER INFORMATION SOLUTIONS

- Design institution-wide action plan
 - Divide requirements by responsible office
 - Assign specific responsibilities to staff
- Make information easily accessible
- Keep consumer information disclosures in one place
- Use FSA resources
 - Consumer Information Disclosures At-A-Glance
 - Federal Student Aid Handbook – Appendix F
 - FERPA Model Notification Postsecondary Officials

SATISFACTORY ACADEMIC PROGRESS POLICY NOT ADEQUATELY DEVELOPED/MONITORED

- Inadequate Satisfactory Academic Progress (SAP) Policy
 - Missing elements
 - Incorrect elements
- Failure to apply SAP policy
- Incorrect SAP assessments
- Insufficient or missing documentation to support SAP
- Aid disbursed to students not meeting SAP standards

Regulations: 34 C.F.R. §§ 668.16(e), 668.32(f) and 668.34

SATISFACTORY ACADEMIC PROGRESS SOLUTIONS

- Review/revise SAP policy to include all correct elements
- Publish revised SAP policy in consumer information
- Retain SAP document in student file or store documentation in system
- Strengthen policies and procedures to consistently apply SAP standards
- Train staff on SAP procedures
- Conduct periodic random file reviews

LACK OF ADMINISTRATIVE CAPABILITY

- Serious and systemic violations
- Incapable and/or inadequate staffing
- Evidence of issues affecting Title IV administration
- Otherwise appears to lack ability to competently administer Title IV programs

Regulations: 34 C.F.R. § 668.16

STANDARDS OF ADMINISTRATIVE CAPABILITY SOLUTIONS

- Designate capable individuals to coordinate Title IV administration
- Hire adequate number of staff
- Create/strengthen policies and procedures
- Provide recurring staff training
- Submit applications/reports to ED timely
- Protect student information
- Develop quality Default Prevention Plan
- Use peer review system to detect errors and negligence

ACCOUNT RECORDS INADEQUATE/NOT RECONCILED

- Inaccurate disbursement records
 - Late submission of disbursement records in COD
 - COD records do not match student ledgers
- Inaccurate fiscal records and accounting for funds
 - Failure to reconcile Title IV accounts
 - Failure to identify Title IV bank accounts

*Regulations: 34 C.F.R. §§ 668.24, 668.161-668.167,
674.19, 675.19, 676.19,
685.300(b)(5), 685.301(c),
and 690.83*

ACCOUNT RECORDS SOLUTIONS

- Implement solutions for G5 expenditures audit finding
- Follow Heightened Cash Monitoring rules, if required
- Maintain accurate and complete fiscal records
 - Reconcile Title IV accounts monthly
 - Verify “Federal” in each Title IV bank account title
 - Demonstrate clear audit trail from subsidiary to general ledger accounts
 - Use understandable student account statement/ledger system
- Drawdown funds for immediate use only

CRIME AWARENESS REQUIREMENTS NOT MET

- Annual Security Report (ASR) requirement not met
 - ASR not distributed by October 1
 - Incomplete ASR
- Campus security policies not adequately developed
- Crime tracking system inadequate or missing
- Crime statistics reporting discrepancies

Regulations: 34 C.F.R. §§ 668.41, 668.46, and 668.49

CRIME AWARENESS SOLUTIONS

- Design institution-wide action plan
 - Forward ED campus security information to responsible office
 - Develop multi-office team responsible for ASR preparation, timely distribution, and record retention
 - Establish peer review of campus security disclosures
- Make campus safety information easily accessible
- Use FSA resources
 - The Handbook for Campus Safety and Security Reporting
 - Consumer Information Disclosures At-A-Glance
 - Federal Student Aid Handbook – Appendix F

SCHOOL ELIGIBILITY AND OVERSIGHT SERVICE GROUP (SEOSG)

Nancy Gifford – Acting Director, School Eligibility and Oversight Service Group
215-656-6436

School Eligibility and Oversight Service Group General Number: 202-377-3173 or email: CaseTeams@ed.gov

Or call/email the appropriate School Participation Division below for information and guidance on audit resolution, financial analysis, program reviews, school and program eligibility/recertification, and school closure information.

New York/Boston School Participation Division

*Connecticut, Maine, Massachusetts, New Hampshire, Rhode Island, Vermont,
New Jersey, New York, Puerto Rico, Virgin Islands*

E-mail Mailbox: NYBostonSPD@ed.gov

Betty Coughlin, Division Chief 646-428-3737

Chris Curry – New York 646-428-3738

Jennifer Uhlir – Boston 617-289-0121

Teresa Martinez – New York 646-428-3748

Philadelphia School Participation Division

District of Columbia, Delaware, Maryland, Pennsylvania, Virginia, West Virginia

E-mail Mailbox: PhiladelphiaSPD@ed.gov

Sherrie Bell, Acting Division Chief 202-377-3349

Bronsdon Thompson – Philadelphia 202-377-3747

Multi-Regional and Foreign Schools

Participation Division

E-mail Mailbox: Multi-RegionalSPD@ed.gov

FSA.Foreign.Schools.Team@ed.gov

Michael Frola, Division Chief 202-377-3364

Mark Busskohl – Washington, DC 202-377-4572

Michelle Allred – Dallas 214-661-9466

Julie Arthur – Seattle 206-615-2232

David Garza – Dallas 214-661-9694

Atlanta School Participation and Financial Analysis Division

*Alabama, Florida, Georgia, Mississippi, North Carolina,
South Carolina*

E-mail Mailbox: AtlantaSPD@ed.gov

Christopher Miller, Division Chief 404-974-9297

Vanessa Dillard – Atlanta 404-974-9418

Vinita Simpson – Atlanta 404-974-9260

Dallas School Participation Division

Arkansas, Louisiana, New Mexico, Oklahoma, Texas

E-mail Mailbox: DallasSPD@ed.gov

Cynthia Thornton, Division Chief 214-661-9457

Jesus Moya – Dallas 214-661-9472

Kim Peeler – Dallas 214-661-9471

Kansas City School Participation and Third-Party Servicer Division

Iowa, Kansas, Kentucky, Missouri, Nebraska, Tennessee

E-mail Mailbox: KansascitySPD@ed.gov

FSAPC3rdpartyserviceroversight@ed.gov

Dvak Corwin, Division Chief 816-268-0420

Angie Beam – Kansas City 816-268-0534

Kathy Feith – Kansas City 816-268-0406

Chicago/Denver School Participation Division

*Illinois, Minnesota, Ohio, Wisconsin, Indiana, Colorado, Michigan,
Montana, North Dakota, South Dakota, Utah, Wyoming*

E-mail Mailbox: Chicago.Denver.SPD@ed.gov

Jeremy Early, Division Chief 312-730-1529

Jason Charlton – Chicago 312-730-1695

Tammi Sawyer – Chicago 312-730-1531

Brenda Yette – Chicago 312-730-1522

San Francisco/Seattle School Participation Division

*American Samoa, Arizona, California, Guam, Hawaii, Nevada,
Palau, Marshall Islands, North Marianas, State of Micronesia,*

Alaska, Idaho, Oregon, Washington

E-mail Mailbox: Sanfrancisco.Seattle.SPD@ed.gov

Martina Fernandez-Rosario, Division Chief

415-486-5605

Erik Fosker – San Francisco 415-486-5606

Kim Meadows – Washington, DC 202-377-3058



We appreciate your feedback and comments.

CONTACT INFORMATION

Effie Barnett

Effie.Barnett@ed.gov

312-730-1587

RESOURCES BY TOP 10 FINDINGS

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- **Student Status – Inaccurate/Untimely Reporting**
 - Regulation: 34 C.F.R. § 685.309(b)
 - NSLDS® Enrollment Reporting Guide
(ifap.ed.gov/nslds-reference-materials/nsldsenrollmentreportingguide112519)
 - NSLDSFAP website - newsletter updates (nsldsfap.ed.gov/nslds_FAP/)
 - “News & Events” menu item

RESOURCES BY TOP 10 FINDINGS

- **Repeat Finding (Audit)**
 - Regulations: 34 C.F.R. §§ 668.16 and 668.174(a)
 - FSA Assessments: Assessments Addressing School Topics – A Guide to Creating a Policies and Procedures Manual
 - Federal Student Aid Handbook, Volume 4, Appendix B (Policies and procedures manuals and internal controls)

RESOURCES BY TOP 10 FINDINGS

- **R2T4 Calculation Errors and R2T4 Made Late**
 - Regulations: 34 C.F.R. §§ 668.22 and 668.173(b)
 - FSA Assessments: Assessments Addressing School Topics – Return of Title IV Funds
 - *FSA Handbook, Volume 5*
 - R2T4 Worksheets
 - Electronic Web Application (cod.ed.gov)
 - Paper (*FSA Handbook, Appendix to Volume 5*)

RESOURCES BY TOP 10 FINDINGS

- **Verification Violations**
 - Regulations: 34 C.F.R. §§ 668.51– 668.61 (Subpart E) and 668.16(f)
 - FSA Assessments: Assessments Addressing Student Topics – Verification
 - *FSA Handbook, Application & Verification Guide*, Chapters 4 and 5, and Volume 2, Chapter 3

RESOURCES BY TOP 10 FINDINGS

- **Qualified Auditor's Opinion Cited in Audit**
 - Regulations: 34 C.F.R. §§ 668.16(a)–(c), and § 668.171(h)
 - FSA Coach Fundamentals (fsatraining.ed.gov)
 - FSA Assessments
 - *FSA Handbook, Application and Verification Guide, Volumes 2, 4, and 5*
- **Student Credit Balance Deficiencies**
 - Regulations: 34 C.F.R. §§ 668.164(h) and 668.165(b)
 - *FSA Handbook, Volume 4, Chapter 2*

RESOURCES BY TOP 10 FINDINGS

- **Entrance/Exit Counseling Deficiencies**
 - Regulations: 34 C.F.R. § 668.24(c)(1)(v) and § 685.304
 - FSA Coach Fundamentals (fsatraining.ed.gov)
 - Packaging – Direct Loan Entrance Counseling
 - Departure – Exit Loan Counseling
 - *FSA Handbook, Volume 2, Chapter 6*
 - Federal Student Aid (studentaid.gov)

RESOURCES BY TOP 10 FINDINGS

- **G5 Expenditures Untimely/Incorrectly Reported**
 - Regulations: 34 C.F.R. §§ 668.164(a), 685.301(c), 690.83
 - Federal Register: Award Year Deadline Dates
 - 2020-2021 dates: Federal Register/Vol. 85, No. 135/Tuesday July 14, 2020
 - *FSA Handbook*, Volume 4, Chapter 2
 - FSA Coach Fundamentals
 - Disbursement – Cash Management and Disbursements

RESOURCES BY TOP 10 FINDINGS

- **Pell Grants Overpayment/Underpayment**
 - Regulation: 34 C.F.R. Part 690
 - *FSA Handbook*, Volume 3, Chapter 3, and Volume 4, Chapter 3
 - FSA Coach Fundamentals
 - Disbursement – Overawards and Overpayments

RESOURCES BY TOP 10 FINDINGS

- **Consumer Information Requirements Not Met**
 - Regulations: 34 C.F.R. Part 99, §§ 668.41 - 668.50 and Appendix A (Subpart D)
 - Higher Education Act of 1965, as amended, Sec. 485
 - *FSA Handbook, Volume 2, Chapters 6 and 7*
 - FSA Training: Search “Consumer Information” (fsatraining.ed.gov)
 - FSA Assessments: Assessments Addressing School Topics – Consumer Information
 - *Consumer Information Disclosures At-A-Glance*
 - Model Notification of Rights under FERPA for Postsecondary Institutions (www2.ed.gov/policy/gen/guid/fpco/ferpa/ps-officials.html)

RESOURCES BY TOP 10 FINDINGS

- **Satisfactory Academic Progress Policy Not Adequately Developed/Monitored**
 - Regulations: 34 C.F.R. §§ 668.16(e), 668.32(f), and 668.34
 - FSA Coach Fundamentals (fsatraining.ed.gov)
 - Review – Satisfactory Academic Progress
 - FSA Assessments: Assessments Addressing Student Topics – Satisfactory Academic Progress
 - *FSA Handbook*, Volume 1, Chapter 1, and Volume 2, Chapter 3

RESOURCES BY TOP 10 FINDINGS

- **Lack of Administrative Capability**
 - Regulations: 34 C.F.R. § 668.16
 - *FSA Handbook, Volume 2, Chapter 3*
- **Account Records Inadequate/Not Reconciled**
 - Regulations: 34 C.F.R. § 668.24, §§ 668.161-668.167 (Subpart K), and §§ 668.171 – 668.176 and Appendices (Subpart L), § 674.19, § 675.19, § 676.19, §§ 685.300(b)(5) and 685.301(c), and § 690.83
 - Federal Register: Award Year Deadline Dates
 - 2020-2021 dates: Federal Register/Vol. 85, No. 135/Tuesday July 14, 2020
 - FSA Coach Fundamentals
 - Disbursement – Cash Management and Disbursements
 - *FSA Handbook, Volume 4 and Volume 6, Chapter 2*

RESOURCES BY TOP 10 FINDINGS

- **Crime Awareness Requirements Not Met**
 - Regulations: 34 C.F.R. §§ 668.41 - 668.49 (Subpart D)
 - Higher Education Act of 1965, as amended, Sec. 485
 - *FSA Handbook, Volume 2, Chapters 6 and 7*
 - FSA Training: Search “Campus Security” (fsatraining.ed.gov)
 - FSA Assessments: Assessments Addressing School Topics – Consumer Information
 - *Consumer Information Disclosures At-A-Glance*
 - *The Handbook for Campus Safety and Security Reporting*
www2.ed.gov/admins/lead/safety/campus.html

TOP 10 RESOURCES FOR COMPLIANCE SOLUTIONS

TOP 10 RESOURCES

- FSA Assessments

ifap.ed.gov/ilibrary/document-types/fsa-assessments

- A Guide to Creating a Policies and Procedures Manual
- Consumer Information/Campus Security
- Fiscal Management
- Institutional Eligibility
- Return of *Title IV* Funds
- Satisfactory Academic Progress
- Verification

TOP 10 RESOURCES

- FSA Training
fsatraining.ed.gov
 - Fundamentals Training Series (Coach Fundamentals and Workshops)
 - Learning Tracks
 - Systems and Software Training
 - Quick Take Videos
 - Recorded Webinars

TOP 10 RESOURCES

- *Federal Student Aid (FSA) Handbook*
 - Application and Verification Guide
 - Chapter 4: Verification, Updates, and Corrections
 - Chapter 5: Special Cases
 - Volume 1 (Student Eligibility)
 - Chapter 1: School-Determined Requirements (Satisfactory Academic Progress)
 - Volume 2 (School Eligibility and Operations)
 - Chapter 3: FSA Administrative & Related Requirements (Administrative Capability)
 - Chapter 6: Consumer Information and School Reporting
 - Chapter 7: Record Keeping, Privacy & Electronic Processes
 - Chapter 8: Program Reviews, Sanctions & Closeout

TOP 10 RESOURCES

- *FSA Handbook*
 - Volume 3 (Calculating Awards and Packaging)
 - Chapter 1: Academic Calendar, Payment Periods, & Disbursements
 - Volume 4 (Processing Aid and Managing FSA Funds)
 - Chapter 1: Requesting and Managing FSA Funds
 - Chapter 2: Disbursing FSA Funds
 - Chapter 3: Overawards and Overpayments
 - Chapter 5: Reconciliation in the Pell Grant and Campus-Based Programs
 - Chapter 6: Reconciliation in the Direct Loan Program
 - Appendix A: Accounting Systems
 - Appendix B: A School's Financial Management Systems

TOP 10 RESOURCES

- *FSA Handbook*
 - Volume 5 (Withdrawals and the Return of Title IV Funds)
 - Chapter 1: Withdrawals and the Return of Title IV Funds
 - Chapter 2: The Steps in a Return of Title IV Aid Calculation
 - Appendix: Forms Associated with a Return of Title IV Aid Calculation
 - Volume 6 (The Campus-Based Programs)
 - Chapter 2: The Federal Work-Study Program
 - Appendices A – G

TOP 10 RESOURCES

- Code of Federal Regulations
 - Title 34, Education
 - ecfr.federalregister.gov/current/title-34 (new beta eCFR site)
 - Subtitle A: Office of the Secretary, Department of Education
 - Part 84 (Drug Free Workplace)
 - Part 86 (Drug and Alcohol Abuse Prevention)
 - Part 99 (Family Education Rights and Privacy)
 - Subtitle B: Regulations of the Offices of the Department of Education, Chapter VI
 - Part 600 (Institutional Eligibility under the *Higher Education Act of 1965*, as amended)
 - Part 668 (Student Assistance General Provisions)
 - Parts 673 – 676 (Campus-Based Provisions)
 - Part 685 (William D. Ford Federal Direct Loan Program)
 - Part 686 (TEACH Grant Program)
 - Part 690 (Federal Pell Grant Program)

TOP 10 RESOURCES

- FSA Worksheets, Schedules, & Tables
 - Student Aid Eligibility, EFC Formula, Pell Grant Payment and Disbursement Schedules, and R2T4 Worksheets
ifap.ed.gov/worksheets-schedules-tables
- Return of *Title IV* (R2T4) on the Web
cod.ed.gov (Tools)

TOP 10 RESOURCES

- Campus Security
www2.ed.gov/admins/lead/safety/campus.html
fsatraining.ed.gov (selected topics)
- Entrance/Exit Counseling
studentaid.gov
- Cohort Default Rate Guide
ifap.ed.gov/dm/finalcdrg
- School Data on StudentAid.gov
studentaid.gov/data-center/school