

Session 21: How to use the FSA Assessments

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Training Objectives

1	<ul style="list-style-type: none">• Locate and Review FSA Assessments
2	<ul style="list-style-type: none">• Review Policies & Procedures Activities
3	<ul style="list-style-type: none">• Discuss Benefits of a Manual

FSA Assessments

- ▶ Go to <http://ifap.ed.gov>



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(IFAP) W
resource
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The mos

in the **What's New** section.

Tools for Schools

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

Tools for Schools



Federal Student /
assist in working
systems.

To access these

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](#)

From IFAP Select Tools
For Schools

Select FSA Assessments



FSA Assessments

In collaboration with financial aid professionals, Federal Student Aid has designed management assessment modules to help schools enhance their services. The modules contain links to applicable laws and regulations. If you have questions regarding how to use this useful tool please visit our [FAQ page](#).

[This chart](#) features examples of specific compliance issues and provides recommendations for related assessments that your school may want to complete.

(ALL assessments have been updated with the new 2009-10 FSA Handbook Links!)

Students

[Student Eligibility](#)

[Satisfactory Academic Progress](#)

[Verification](#)

Managing Funds

[Fiscal Management](#)

[Return of Title IV Funds](#)

[FWS](#)

[FSEOG](#)

[Perkins Awarding & Disbursement](#)

[Perkins Due Diligence](#)

[Perkins Repayment](#)

[Perkins Forbearance & Deferment](#)

Schools

[Institutional Eligibility](#)

[Default Prevention & Management](#)

[Consumer Information](#)

[Automation](#)

Innovations

[Policies and Procedures](#)

[A Guide to Creating a Policies and Procedures Manual](#)

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Links

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▶ Intermediate

▶ Advanced

Beginners (New Schools)

If your school is new, it will be very beneficial for you to begin with the Getting Started with Developing Institutional Policies and Procedures Worksheet. This worksheet will help ensure your school meets the basic regulatory requirements in the following policy areas:

Satisfactory Academic Progress (SAP)

Admissions

Refunds

Returns to the Title IV and HEA Programs

Each of these four sections provides a working Topic Template to assist you with the development of your policy and procedure design. Although not required, they can be useful guides.

Once your school has satisfied the basic requirements, you will be ready to move on to the assessments provided in the Intermediate section of the Policies and Procedures Chart.

Policies & Procedures
Activity

Beginners

Procedure: Admissions Policy/ATB.

This section is required only if your Admissions Policy accepts ATB students. 34 CFR 668, Subpart J: 600.4(a)(2); 600.5(a)(3); 600.6(a)(2).

Your policy for Ability to Benefit must include the following:

- The process to ensure that ATB students are beyond the age of compulsory attendance.
- Ability to Benefit limits. To be eligible for Federal Student Aid, students who are beyond the age of compulsory attendance but who do not have a high school diploma or its recognized equivalent must meet ability-to-benefit criteria or meet the student eligibility requirements for a student who is home schooled. No more than 50% of a school's regular students may be enrolled without a high school diploma or equivalent at a school that does not provide a 4-year bachelor's degree or 2-year associate degree program.
- If a test is used, the name of the approved test used.
- Process to show that the test is independently administered.
- If you admit students as ability to benefit based on satisfactorily completing 6 credit hours or equivalent coursework applicable to degree or certificate, include the process for determination.

Beginners



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[Code of Federal Regulations]
[Title 34, Volume 3]
[Revised as of July 1, 2009]
From the U.S. Government Printing Office via GPO Access
[CITE: 34CFR600.4]

[Page 190]

TITLE 34--EDUCATION

CHAPTER VI--OFFICE OF POSTSECONDARY EDUCATION, DEPARTMENT OF EDUCATION

PART 600_INSTITUTIONAL ELIGIBILITY UNDER THE HIGHER EDUCATION ACT OF
1965, AS AMENDED--Table of Contents

Subpart A_General

Sec. 600.4 Institution of higher education.

(a) An institution of higher education is a public or private nonprofit educational institution that--

(1) Is in a State, or for purposes of the Federal Pell Grant, Federal Supplemental Educational Opportunity Grant, Federal Work-Study, and Federal TRIO programs may also be located in the Federated States of Micronesia or the Marshall Islands;

(2) Admits as regular students only persons who--

(i) Have a high school diploma;

(ii) Have the recognized equivalent of a high school diploma; or

(iii) Are beyond the age of compulsory school attendance in the State in which the institution is physically located;

(3) Is legally authorized to provide an educational program beyond secondary education in the State in which the institution is physically located;

(4) Provides an educational program--

(i) For which it awards an associate, baccalaureate, graduate, or professional degree;

(ii) That is at least a two-academic-year program acceptable for

Hyperlink to 600.4(a)(2)



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Description of Policy and Procedure:

Offices that need to be involved

Lead Persons to Coordinate Policy and Procedure:

Name: _____ Name: _____

Title: _____ Title: _____

Phone Number: _____ Phone Number: _____

Start Date (mm/dd/yy):

Anticipated Completion Date:

Actual Completion Date:

Did you review and test the procedure for accuracy?

Was the policies and procedures manual updated to reflect appropriate changes? Yes or No

1. If Yes, what section was updated?
2. Enter the date that the Policies and Procedures Manual was updated to reflect these changes:
3. Were staff members properly trained about new procedures? Yes or No

We recommend that your school annually review your policies and procedures and revise accordingly. Remember, you must consistently follow all policies and procedures developed by your school.

Beginners



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▶ Beginners

▶ Intermediate

▶ Advanced

Intermediate

Use the activities and resources in the Intermediate section of the Policies and Procedures Chart if:

- your school is new and has satisfied the basic requirements;
- your staff is unsure about the existing policies and procedures; or
- your school wants to enhance existing policies and procedures.

The activities featured in the Intermediate section are designed to help your school meet the minimum general requirements. This section also provides links to *A Guide to Creating a Policies and Procedures Manual* and other activities to assist you with the development of your policy and procedure design.

The Policies and Procedures Chart is structured as follows:

1. **Topic Template:** Click on a topic and it will link to the template for that policy and procedure. Use the template to either help create a new policy and/or procedure or to test current policies and procedures by completing a related assessment.
2. **P&P Section:** Click on the text and it will link to the appropriate chapter from *A Guide to Creating a Policies and Procedures Manual* related to that topic.
3. **Related Assessment Activities:** If an assessment is identified in this column, we encourage you to complete the associated activities to help evaluate your policies and procedures.

Once your school has satisfied the minimum general requirements, you will be ready to move on to the activities provided in the Advanced section of the Policies and Procedures Chart.

Policies & Procedures
Activity

Intermediate

Intermediate

This chart provides Topic Templates and Activities that will help Intermediate level schools meet Minimum General Requirements.



Topic Template	P&P Section	Related Assessment Activities
Institutional Eligibility	Section 2	Institutional Eligibility
Adequate Staffing	Section 1	Fiscal Management
Consumer Information	Section 1 and 3	Consumer Information
Admissions Policy/ATB	Section 2 and 3	Student Eligibility
Secondary Confirmation	Section 3	Student Eligibility
Certification	Section 3	Student Eligibility
Satisfactory Academic Progress	Section 1	SAP
Return of Title IV/Refund Repayments	Section 3 and 10	R2T4
Awarding/Packaging Policies	Section 4, 5, and 6	FSEOG , FWS , Perkins Awarding and Disbursement
Verification	Section 3	Verification
Documentation	Section 3	Student Eligibility
Conflicting Data	Section 1	Verification
Professional Judgment	Section 3	Verification
Misrepresentation	Section 3	Verification
Adequate Checks and Balances	Section 1	Fiscal Management
Financial Aid Counseling	Section 1	Consumer Information , Fiscal Management
Fiscal Reports and Financial Statements	Section 1	Fiscal Management
ACG and National SMART	Section 8	Fiscal Management
Federal Pell Program	Section 7	Fiscal Management
Federal SEOG Program	Section 6	FSEOG
Federal Work-Study Program	Section 5	FWS
Federal Perkins Loan Processes	Section 4	Awarding & Disbursement , Due Diligence , Cancellation , Repayment , Forbearance & Deferment
FFEL Loan Process	Section 9	Fiscal Management , Consumer Information ,





Procedure: Satisfactory Academic Progress (SAP).

This section is required [668.16\(e\)](#).

Required information:

1. Establish, publish and apply reasonable standards for measuring whether an otherwise eligible student is making SAP in their education program.
2. Identify if the standard is the same or stricter than the institution's standards for a student enrolled in the same educational program who is not receiving Title IV assistance.
3. List the qualitative component that consists of grades (provided that the standards meet or exceed the requirements of [668.34](#)), work projects completed, or comparable factors that are measurable against a norm.
4. List the quantitative component that consists of a maximum time frame in which a student must complete their education program.
5. Provide the time frame for an undergraduate program; it may not be longer than 150% of the published length.
6. Identify when you will check SAP, not to exceed the lesser of one academic year or one-half the published length of the educational program.
7. Provide schedule established by the institution designating the minimum percentage or amount of work that a student must successfully complete at the end of each increment to complete their educational program within the maximum time frames.
8. Establish written policies defining the effect of course incompletes, withdrawals, repetitions and noncredit remedial courses on SAP.
9. Identify how a school implements a consistent application of standards and documents the SAP decision.
10. Provide appeal procedure for those not making SAP.
11. Provide a procedure for a student to re-establish and document they have made SAP.



- ▶ Beginners
- ▶ Intermediate
- ▶ **Advanced**

Advanced

Use the activities and resources in the Advanced section of the Policies and Procedures Chart if:

- your school has satisfied the minimum general requirements; and
- your school wants to go above and beyond its existing policies and procedures and institute good practices; or
- your school wants to test existing policies and procedures by completing the appropriate activity.

Policies & Procedures
Activity

Advanced

Advanced

In addition to providing Topic Templates and Activities that will help Advanced level schools institute good practices, the Intermediate chart below provides Topic Templates and Activities that will help Advanced level schools test their current policies and procedures.

Topic Template	P&P Section	Related Assessment Activities
Overview	Section 1	
Description of all aid programs	Section 1	
Organizational Structure of Financial Aid Office/Business Office	Section 1	
Calendar of Financial Aid Activities	Section 1	
Audits and Program Review Process/ Self-Evaluation Process	Section 1	
Samples of all Forms used by school	Section 1	
Academic Year Definition	Section 2	
Cost of Attendance	Section 7	
Office Automation	Section 1	Automation
NSLDS Processes	Section 2	Student Eligibility
FERPA	Section 3	Consumer Information



Procedure: Organizational Structure of Financial Aid Office and Business Office.

This section is a good practice.

Suggested information:

1. Description of the organizational structures of the business office and the financial aid office.
2. Include a flow chart or organizational chart that shows the structure of both offices.
3. Include copies of Job Descriptions for key positions in both offices.
4. You may want to include the structure of other offices that work closely with the Financial Aid Office.
5. Include the general office hours for the office and how appointments are made to assist students.

Description of Policy and Procedure:

Offices that need to be involved:



[Policies and Procedures Activities At-A-Glance](#) is an additional chart that makes it easy to review the areas identified in the linked activities. It identifies areas outlined in the law and regulations that require a written policy and procedure and also provides links to the regulations for you to review.

Knowing the regulations will assist you in being good stewards in the development and implementation of your policies and procedures. It will also assist you in your audit and program review experiences.

POLICIES AND PROCEDURES

At-A-Glance



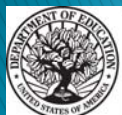
Administrative Capability	Section 1	Policy and Procedure Regulatory Citation
		668.16 (b) (Adequate number of qualified persons to administer the Title IV Programs)
		668.16 (c) (Adequate checks and balances)
		668.16 (e) (Satisfactory Academic Progress)
		668.16 (f) (Conflicting Data)
		668.16 (d) ; 668.24 (b) ; 668.164 (Fiscal Reports and Financial Statements)
		668.16 (h) (Financial Aid Counseling)
Institutional Eligibility	Section 2	Policy and Procedure Regulatory Citation
		600.20 ; 600.21 (General Requirements)
		600.20 ; 600.21 (Updating Application Information)
		600.4 (a)(2) ; 600.5 (a)(3) ; 600.6 (a)(2) (Admission Policy for Public or Private Nonprofit educational institution, Proprietary Institution of higher education, and Postsecondary Vocational Institution)
General Provisions	Section 3	Policy and Procedure Regulatory Citation
		668.13 (Certification)



A Guide to Creating a Policies & Procedures Manual

We are pleased to announce the availability of "A Guide to Creating a Policies and Procedures Manual." We have developed this guide to assist schools in creating and revising written documentation of how they comply with the various federal regulations pertaining to the administration of the Title IV programs. The guide features activities designed to help a school meet the minimum general requirements with regard to documented policies and procedures. The document also highlights additional areas for which written policies and procedures are suggested in the Federal Student Aid Handbook.

Section	Description
Cover page and Table of Contents	A Cover Page that can be used when designing your Policies and Procedures Manual.
Introduction and Section 1	This policies and procedures guide is designed to assist institutions in documenting policies and procedures that are required by federal regulations as they pertain to the administration of the Title IV student assistance programs. The activities featured in the guide are designed to help a school understand the minimum general statutory and regulatory requirements. Additional information is also provided for consideration in the development of a comprehensive policies and procedures manual.
Section 2	This section addresses Institutional Eligibility in regards to application procedures for establishing, re-establishing, maintaining, or expanding institutional eligibility and certification and updating application information.
Section 3	This section outlines the requirements contained in the General Provisions Regulations.
Section 4	This section provides requirements for the Federal Perkins Loans.
Section 5	This section addresses the requirements for the FWS and Job Location and Development Program.
Section 6	This section provides guidance on the administration of the Federal SEOG Program.



Introduction and Section 1

A Guide to Creating a Policies and Procedures Manual (Updated for 2010-11 Award Year requirements)

This policies and procedures guide is designed to assist institutions in documenting policies and procedures that are required by federal regulations as they pertain to the administration of the Title IV student assistance programs. The activities featured in the guide are designed to help a school understand the minimum general statutory and regulatory requirements. Additional information is also provided for consideration in the development of a comprehensive policies and procedures manual.

Federal regulations require schools to have written policies and procedures for the administration of the Title IV student assistance programs; however a manual is not required. Experience shows that having a manual will assist schools in implementing and adhering to established procedures, as well as routinely reviewing and updating them. A manual may also streamline audit and program review experiences. It is a tool to assist schools in being good stewards in the administration of the Title IV programs and the delivery of dollars and services to students.

To assist your school with revising or creating a policies and procedures manual, we recommend that you begin with these sections first. These areas are typically requested prior to a program review:

[Satisfactory Academic Progress \(SAP\)](#) (Section 1.3)

[Admissions](#) (Sections 2.3 and 3.10)

[Refunds](#) (Sections 9.3 and 10.3)

[Returns to Title IV and HEA Programs](#) (Section 3.2)

[Consumer Information](#) (Section 3.3)

[Verification](#) (Section 3.4)



Suggested ICONS

Icon Definition

Icons are a useful way of designating categories of information.

The following icons have been developed for use with your policies and procedures.



Good Practice

Good Practice suggestion. However, if you commit to a good practice you must ensure it is followed.



Tip

Suggestions for handling a form or procedures efficiently



Help

Points the reader to helpful information



Policy

Briefly states or refers reader to specific policy documents available in other offices



Important

A critical piece of information that, if overlooked, could result in an error



Exception

A way of doing something that is an exception to the general rule and why it is an exception





Institutional Overview

(Good Practice Suggestion)

An institutional overview provides information specific to your institution that provides colleagues with an understanding of your financial aid operations.

Name of Institution:

OPE ID:

Suggested information:

1. School and its mission, number of students receiving Financial Aid, and its philosophies.
2. Information pertaining to your school that is unique and may require explanation.

Calendar of Activities

Suggested information:

- Include a calendar of all financial aid activities. The calendar should include an explanation of activities for each month of the year. Be sure to include activities that may involve other offices and list those offices.

Sample of all Forms and Materials used by the school

Suggested information:



Part 1.1

Adequate Staffing Procedure

This section is required
668.16(b)

1. List the offices involved in approving and Disbursing Title IV Aid. Provide a short description of each office as indicated (If other offices are involved at your school and are not listed below, include descriptions of those offices as well):

Academic or Education Personnel/Registrar:

Employee job duties and staff functions

Institutional communication (how the Registrar communicates with other institutional offices)

Admissions Personnel:

Employee job duties and staff functions

Institutional Communication (how the Admissions Office communicates with other institutional offices)

Financial Aid Personnel:

Employee job duties and staff functions

Institutional Communication (how the Financial Aid Office communicates with other institutional offices)



Documentation to show clear and separate division of responsibility for the administration of financial aid programs that are divided between the Financial Aid Office and the Fiscal Office.

Complete the information below to indicate individuals who are responsible for the Financial Aid and Fiscal Office as applicable at your institution. You must ensure that there is a separation of function as outlined in [668.16](#):

Financial Aid Office

Fiscal or Business Office



Good Practices

(Good Practice Suggestion)

Providing specific detail of your organizational structure assists in an understanding of how your Title IV aid operation is structured.

-
- Describe the organizational structures of the business office and the financial aid office.
 - Include the general office hours for the offices and how appointments are made to assist students.
 - Include a flow chart or organizational chart that shows the structure and interfaces of



Documentation to show that Satisfactory Academic Progress standards are published and are reasonably applied for measuring whether an otherwise eligible student is making SAP in his/her educational program.

Academic Standards:

SAP Standard for Title IV students:

Standard for student enrolled in same educational program who is not receiving Title IV assistance:

Are standards for Title IV students the same or stricter than non Title IV students enrolled in the same educational program? Y N

List the:

- Qualitative component for measuring SAP (must consist of grades with standards that meet or exceed the requirements of 668.34, work projects completed, or comparable factors that are measurable against a norm):

- Quantitative component (that consists of a maximum timeframe) for which a student must complete his/her educational program:





Important A critical piece of information that, if overlooked, could result in an error

Academic Year Definition (668.3):

Schools are required to define their academic year. It is essential to include the definition in this section in order to understand your SAP standards.

1. Include whether the school offers programs in credit hours with terms, clock hours, or credit hours without terms.
2. Include the minimum academic year definition for all programs.
3. Include whether your school's academic year is more than the minimum requirement.
4. Include whether the school has one definition for all programs. If not, include an explanation of those programs that need a different definition.
5. Include whether the payment periods are determined by terms or by hours and weeks.

Part 1.4

Conflicting Data

**This section is required
668.16 (f)**

Schools must have an adequate system to identify and resolve discrepancies in the information that the school receives from different sources with respect to a student's application for financial aid under the Title IV, HEA programs. Use the information in this section to help you develop your procedures for resolving conflicting data.



START HERE
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Good practices vs. what is required



Chart A provides examples of issues that are considered **Conflicting Data**. Although the chart is designed to be extensive, it is not to be construed as an all-inclusive list. The chart is provided for information only and has been developed to help you review your policies and procedures.

(Important) A critical piece of information that, if overlooked, could result in an error.



Chart B provides examples of issues not considered **Conflicting Data**, but would be a good practice to consider. The chart is provided for information only and has been developed to help you review your policies and procedures.

(Good Practice Suggestion)

Chart A: Examples of issues considered **Conflicting Data**

- A student not selected for verification, the tax return is on file and information conflicts with items on the FAFSA.
- 1040 shows parent single head of household and the FAFSA/ISIR shows the same person as married.
- Parent or student report on their FAFSA and signed a verification worksheet that they will not file an IRS 1040. You have reason to believe that they would have been required to file a U.S. Income Tax Return, as the amount of reported income is greater than or equal to the minimum amount required to file as indicated in the instructions provided on the 1040.
- Statements or information that suggest that the copy of the Income Tax Return you received is not the return actually filed with the IRS.
- School receives Profile from CSS. Student reports a specific amount in untaxed income; FAFSA reports a different amount (If the school receives the CSS Profile, it must ensure that information contained there does not conflict with other documents received by the school).
- Veterans Affairs (VA) benefits verified by the certifying official in the Registrar's Office don't match the FAFSA. (To resolve conflict, can rely on certifying official).



Additional fiscal requirements are found throughout most sections of this manual. The fiscal requirements here are also be *part* of the fiscal requirements in Sections 4-11 of this manual. You may choose to repeat the information contained in this section (in sections 4-11) or you can refer to this section as appropriate. However, you must still include the specific information required in addition to this general fiscal information as applicable in each section.

Maintaining records required under the individual Title IV HEA program regulations. Specifically,


Fiscal reports and financial statements

- Identify systems that will provide all program financial statements required for compliance. Include bank account and internal ledger reconciliation procedures.

Develop and follow procedures for maintaining general fiscal records for Title IV programs as outlined in [34 CFR 668.24 \(b\)](#).

Title IV program Fiscal records

An institution shall account for the receipt and expenditure of Title IV, HEA program funds in accordance with generally accepted accounting principles.

 Section 7	Procedures designed to ensure accountability regarding Fiscal Control and fund accounting for the Federal Pell Grant Program.
Section 8	This section covers the administration of the ACG and National SMART Grants.
Section 9	This section includes the administration of the FFEL Program.
Section 10	This section includes the administration of the Federal Direct Loan.
Section 11	This section covers the administration of the TEACH Grant.
Appendix A	Acronyms and Terms
Appendix B	Example of a Completed Section of the Administrative Capability Policy & Procedure
Appendix C	Policies and Procedures at a Glance

Disclaimer: This document has been prepared to provide schools with basic guidance to develop policies and procedures. However, it should not be assumed that this document is all-inclusive. For a more complete explanation of specific program requirements, your school should refer to the applicable statutes, regulations, and the Federal Student Aid Handbook. It is the school's responsibility to ensure that all Title IV requirements outlined in the Law and regulations are met.



Section 7

Policy: **Federal Pell Grant Program**
Regulations: [690.63](#) (Calculating Federal Pell Grant Awards), [690.80](#) (Recalculation of a Federal Pell Grant Award), [690.81](#) (Fiscal Control and fund accounting procedures)

Purpose: Procedures designed to ensure accountability regarding Fiscal Control and fund accounting for the Federal Pell Grant Program.

Scope: **Specifically Address:**

- 7.1 Calculating Federal Pell Grant Awards
- 7.2 Federal Pell Grant required and optional recalculations
- 7.3 Fiscal records and disbursement requirements for Pell Grants

Responsibilities:
(Identify individuals and/or offices responsible for developing and updating this section)

Definitions:
(Identify acronyms or definitions that will be used in this section)



Schools are required to calculate Pell Grant payments for students. To ensure Pell Grants funds are awarded properly, the following topics need to be addressed:

- Scheduled award, award year and annual award
- Terms and payment methods
- Standard terms
- Nonstandard terms
- Nonterm programs
- Formulas 1, 2, 3, 4 or 5
- Summer terms and other crossover payment periods
- Transfer Students
- Two Pell's in an Award Year
- Cross Over Transition 2009-2010 Award Year



New
Highlights something new for 2009-2010

2009-2010 Cross-Over Transition for Pell:

A school must have a written policy on how it will determine to which award year a student's cross-over payment period will be assigned.

- Generally, if awarding second Scheduled Award from 2009-2010 (including summer 2010 cross-over) new regulations do not apply
- Generally, if awarding from 2010-2011 and beyond (including summer 2010 cross-over) new regulations do apply



Federal Pell Grant required and optional recalculation.

Required Federal Pell Grant recalculations 690.80. Schools are required to have a process for Pell Grant recalculations. Including this process in your manual is a good practice.

Include the process for recalculation of Federal Pell Grant funds for recipients under the following conditions:

- **Change in EFC.** If a student's EFC changes due to corrections, updating, or an adjustment and the EFC would change the amount of Pell award, your school recalculates the Pell award for the entire year. Our procedures are:



Part 7.3

Fiscal Records and Disbursement requirements for Federal Pell Grants

This section is required
Regulation: [690.81](#)

Procedures that outline and follow provisions for maintaining general fiscal records as outlined in [34 CFR 668.24\(b\)](#) and [34 CFR 668.164](#).

Please ensure that you have developed Fiscal procedures for this section. The Fiscal procedures that should be included are outlined in Section 1.5 of this guide. You may want to include a reference to that section of the guide to show that your Fiscal Control and funding accounting procedures are in place for the Federal Pell Grant Program.

APPENDIX B: Example of a completed section of the Administrative Capability policy and procedure

Part 1.4

Conflicting Data

This section is required
668.16 (f)

This section addresses procedures for Conflicting Data and reporting fraud and abuse.

Part 1: Resolving Conflicting Data:

Our procedures ensure that we resolve conflicting data for our applicants as follows:

- **Applicants selected for verification** - If we have reason to believe that any information on the application used to calculate the EFC is discrepant or inaccurate (or if any supporting documentation is discrepant or inaccurate), we require the applicant to provide adequate documentation to resolve the conflict.
- **Applicants not selected for verification** – We resolve conflicting information regardless of whether or not the applicant was selected for verification. As required, the financial aid office will review all tax returns provided to the school even if they were not requested. All C Codes on the ISIR will be reviewed and resolved by the financial aid office.
- **Other applicant information received by the school** - We have an adequate internal system to identify conflicting information that we may have regardless of the source. The office lead for each of the following offices is required to provide information that could impact the financial aid status of each student applicant, e.g. **(Admissions Office:** High School Diploma, **Fiscal Office:** Report outside awards, **Graduate Aid Office:** Report outside awards, **Registrar:** Report changes in enrollment, **FWS Office:** Report FWS earning in a calendar year, **NSLDS:** Review financial aid history, including aid received from prior colleges attended.

In addition, the following chart provides examples of issues we treat as conflicting data and requiring resolution:

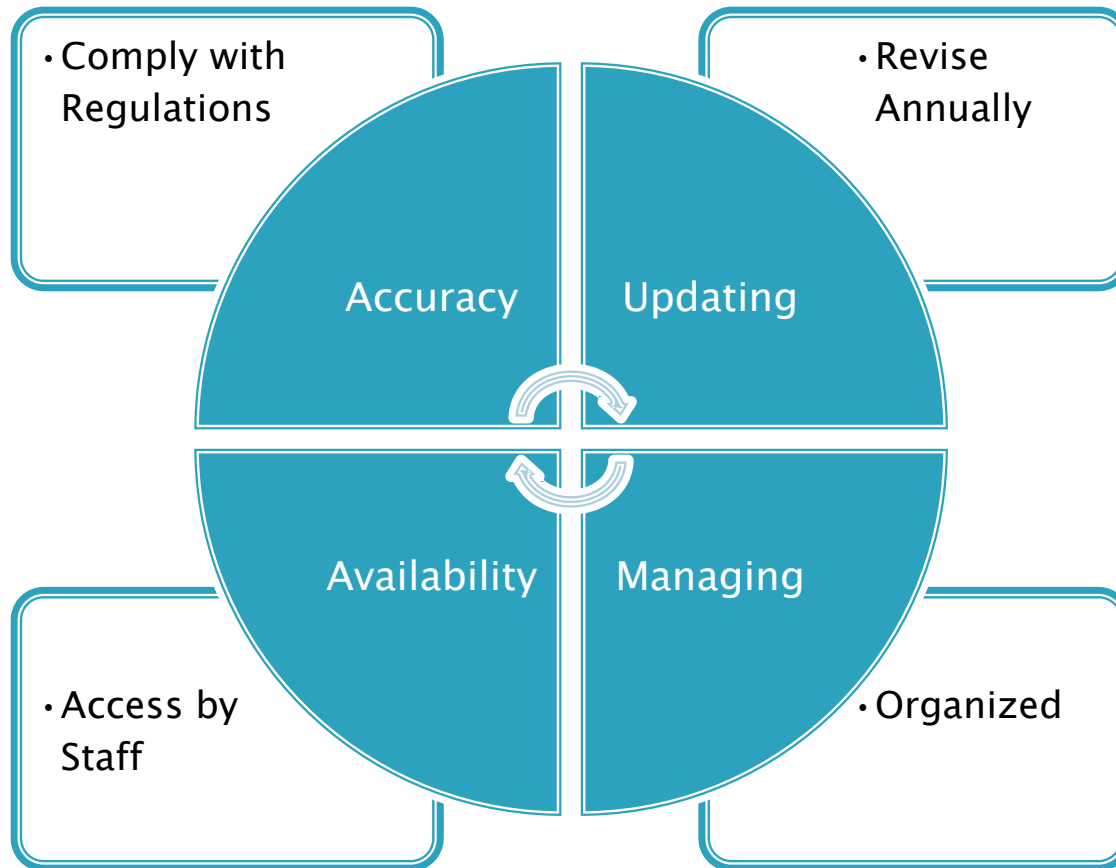


APPENDIX C: POLICIES AND PROCEDURES AT A GLANCE

Administrative Capability	Section 1	Policy and Procedure Regulatory Citation
		668.16 (b) (Adequate number of qualified persons to administer the Title IV Programs)
		668.16 (c) (Adequate checks and balances)
		668.16 (e) (Satisfactory Academic Progress)
		668.16 (f) (Conflicting Data)
		668.16 (d) ; 668.24 (b) ; 668.164 (Fiscal Reports and Financial Statements)
		668.16 (h) (Financial Aid Counseling)
Institutional Eligibility	Section 2	Policy and Procedure Regulatory Citation
		600.20 ; 600.21 (General Requirements)
		600.20 ; 600.21 (Updating Application Information)
		600.4 (a)(2) ; 600.5 (a)(3) ; 600.6 (a)(2) (Admission Policy for Public or Private Nonprofit educational institution, Proprietary Institution of higher education, and Postsecondary Vocational Institution)
General Provisions	Section 3	Policy and Procedure Regulatory Citation



Benefits of a Manual



What We Have Learned

- ▶ Where to locate the Assessments
- ▶ How to use the Policies & Procedures Templates
- ▶ How to use the Guide to Creating a Policies and Procedures Manual
- ▶ The value of having a Manual

Contact Information

We appreciate your feedback and comments:

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- E-mail: Holly.Langer-Evans@ed.gov
- Fax: 617-289-0167

or

Michael Cagle

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- E-mail: Michael.Cagle@ed.gov
- Fax: 206-615-3644