



# TITLE IV COMPLIANCE

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**Its Everyone's Job**

# Presenters from Wentworth Institute of Technology

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# Agenda

- What is Title IV Compliance?
- Why do we care?
- Effective Collaboration is Key
- How does it impact you?
  - Admissions
  - Registrar
- Examples
- Resources
- Q&A
- Our contact information

# What is Title IV Compliance?

- Title IV of the Higher Education Act of 1965 covers the administration of the US federal student financial aid programs.
- Title IV compliance refers the federal regulations (laws) that guide the administration of the federal student financial aid programs.
  - Over 800 pages of law

# Example of Regulation (Law) Guiding Enrollment Reporting

## **§685.309 Administrative and fiscal control and fund accounting requirements for schools participating in the Direct Loan Program.**

(a) *General.* A participating school must—

(1) Establish and maintain proper administrative and fiscal procedures and all necessary records as set forth in this part and in 34 CFR part 688; and

(2) Submit all reports required by this part and 34 CFR part 688 to the Secretary.

(b) *Enrollment reporting process.* (1) Upon receipt of an enrollment report from the Secretary, a school must update all information included in the report and return the report to the Secretary—

(i) In the manner and format prescribed by the Secretary; and

(ii) Within the timeframe prescribed by the Secretary.

(2) Unless it expects to submit its next updated enrollment report to the Secretary within the next 60 days, a school must notify the Secretary within 30 days after the date the school discovers that—

(i) A loan under title IV of the Act was made to or on behalf of a student who was enrolled or accepted for enrollment at the school, and the student has ceased to be enrolled on at least a half-time basis or failed to enroll on at least a half-time basis for the period for which the loan was intended; or

(ii) A student who is enrolled at the school and who received a loan under title IV of the Act has changed his or her permanent address.

(c) *Record retention requirements.* An institution must follow the record retention and examination requirements in this part and in 34 CFR 688.24.

(d) *Accounting requirements.* A school must follow accounting requirements in 34 CFR 688.24(b).

(e) *Direct Loan Program bank account.* Schools must follow the procedures for maintaining funds established in 34 CFR 688.163.

(f) *Division of functions.* Schools must follow the procedures for division of functions in 34 CFR 688.16(c).

(g) *Limit on use of funds.* Funds received by a school under this part may be used only to make Direct Loans to eligible borrowers and may not be used or hypothecated for any other purpose.

(Approved by the Office of Management and Budget under control number 1840-0672)

(Authority: 20 U.S.C. 1087a *et seq.*)

[59 FR 61690, Dec. 1, 1994, as amended at 60 FR 33345, June 28, 1995; 61 FR 60493, Nov. 27, 1996; 61 FR 60610, Nov. 29, 1996; 78 FR 65841, Nov. 1, 2013]

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# Why do we care?

- To participate in any Title IV program, a school must demonstrate that it is administratively capable of managing its basic operations.
- Administrative capability: The ability a school must demonstrate in providing the education it promises and properly managing the Title IV federal student aid (FSA) programs.
- Since Title IV funds are provided to the school, managing the program properly is a **school-wide** responsibility. Therefore, all offices at a school must work together to ensure successful program management.
- The regulations state that a school demonstrates administrative capability if every office within the institution communicates to the financial aid office all information received that is related to a student's eligibility for Title IV assistance. To put this requirement into action requires the total involvement of every office within the institution.



- Every year the school is required to have an A133 Audit performed by an outside agency. The A133 is a school-wide audit to ensure that we are managing federal aid appropriately and following all of the applicable regulations.
- The regulations don't simply govern how federal aid is awarded and disbursed, they govern
  - They way we report crime statistics
  - How we market academic programs
  - How we safeguard student information
  - That we provide the ISBN for every required text book
  - How we present information about drug & alcohol prevention information to students
  - Basically anytime congress wants schools to do something they tie it federal student aid
- The audit results are then submitted back to the Department of Education.
- **Although it varies by school size and type, the percentage of federal funds that were used to pay for tuition and fees last year was around 30%. So if we aren't following the regulations we can lose the ability to participate in the federal aid programs**



# Effective Collaboration is key

- It is important to bring key folks (those with decision making power and those who actually process the work) to the table:
  - Financial Aid
  - Registrar
  - Bursar
  - Faculty
  - Advising
  - Etc

Meet every week for the first 6 to 12 months

Once bigger issues are out of the way, meeting every other week is sufficient

# How does it impact you?

- **Admissions Office**
  - Incentive Compensation
  - Fraud
    - Attending multiple institutions
    - Diploma Mills
  - Initial Student and Parent Contact
    - Consumer Information
    - Provides Financial Aid Information
  - Collects Critical Student Eligibility Data
    - High School diploma or its equivalent
    - Conflicting Information

# How does it impact you?

- **Registrar**

- FERPA
- Consumer Information
  - Academic Catalog
- Satisfactory Academic Progress
  - Accurate and timely grades and GPAs
- Enrollment Reporting
  - Students who have withdrawn (for Return to Title IV funds calculations)
  - Students who never began attendance
  - SULA
- Gainful Employment Reporting

# Examples of A133 Findings

## Registrar Office:

- Number 2 Audit Finding is NSLDS Roster Reporting- inaccurate/untimely reporting
- Numbers 3 and 4 relate to Return to Title IV Funds which are impacted by the communication between the Registrar and Financial Aid offices

## Admissions Office:

- Not on the top 10 list but very important:
  - ensuring the student has a HS diploma or its equivalent
  - misrepresentations made about the nature of an eligible institution's educational programs, its financial charges, or the employability of its graduates

# School Success...

Cooperation, collaboration and communication between all departments is needed to ensure successful program delivery.

# Resources

- Admissions
  - IFAP.ed.gov
  - NEACAC [neacac.org](http://neacac.org)
  - NACAC [nacac.org](http://nacac.org)
  - Your Financial Aid office
- Registrar
  - IFAP.ed.gov
  - NSLDS Enrollment reporting guide  
[ifap.ed.gov/nsldsmaterials/attachments/NewNSLDSEnrollmentReportingGuide.pdf](http://ifap.ed.gov/nsldsmaterials/attachments/NewNSLDSEnrollmentReportingGuide.pdf)
  - NACAC [nacac.org](http://nacac.org)
  - NEACRO [neacrao.org](http://neacrao.org)
  - AACRAO [aacrao.org](http://aacrao.org)
  - Your Financial Aid office

# QUESTIONS

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# Our contact Information

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