



# Using NASFAA Tools to Ensure Title IV Compliance

National Association of Student  
Financial Aid Administrators

The following is a presentation  
prepared for

**MASFAA**

**Grand Rapids, MI**  
**October 9-12, 2011**

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National Association of Student  
Financial Aid Administrators

**Using NASFAA Tools  
to Ensure  
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Presenter

Eunice Powell  
Senior Training Specialist, NASFAA

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# Using NASFAA Tools to Ensure Title IV Compliance

## NASFAA Resources

Resources to help you comply are available at NASFAA.org, including:

- Analysis of new laws, regulations and guidance
- Text of laws, regulations and ED guidance
- NASFAA-developed tools and resources
- Online live and on-demand training and analysis
- Centers with resources to help you comply with new regulations

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## Where to Find Resources



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## Still Can't Find It? Try Searching



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# Using NASFAA Tools to Ensure Title IV Compliance

### Sample Search: Gainful Employment

**TEXT SEARCH**

with all of the words:

**exact phrase:**

at least one of the words:

without the word:

**LIMIT BY**

**Publisher:** Department of Education

Series: Department of Education

Resource Type: Federal Reserve

Award Year:

Publication Date:

Search

We're looking for the gainful employment final rules

Using the "exact phrase" option will narrow our search by excluding any content that has the words "gainful" and "employment," but not the phrase "gainful employment"

Selecting the publisher will narrow the search even further by excluding content that was not published by the U.S. Department of Education

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### Sample Search (continued)

**Series:** Federal Register

**Resource Type:** Regulation: Final

Dear Colleague Letter

Electronic Announcement

**Award Year:**

Journal of Student Financial Aid

NASFAA Advocacy Update

NASFAA Conference

National Conversation

QuickScan Survey

Student Aid Transcript

Today's News

Article

Bill

Book

Brochure

Comment Request

Curriculum

Form

Guide

Index/Glossary

Letter

Monograph

Notice

Online Course

Presentation

Press Release

Regulation: Final

Regulation: Proposed

Report

Identifying the series and the type of resource helps narrow the search even further.

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### Sample Search Results

Matches 1-2 of 2, Sorted By Relevance.

[Edit Search](#) | [Start Over](#)

**Final Rule: Program Integrity: Gainful Employment--New Programs**

The Secretary amends the regulations for Institutional Eligibility Under the Higher Education Act of 1965, as amended (HEA), to establish a process under which an institution applies for approval to offer an educational program that leads to gainful employment in a recognized occupation.

Series=Federal Register Resource Type=Regulation: Final Publication Date=10/29/2010 Publisher=Department of Education ID=2229

**Program Integrity Final Rules Linked**

NASFAA's hyperlinked version of the October 29, 2010, Program Integrity Final Rules Federal Register.

Series=Federal Register Resource Type=Regulation: Final Publication Date=10/29/2010 Publisher=Department of Education ID=3409

Using advanced search gives you specific results. The first is the actual final rule published in the Federal Register by the Department and the second is an enhanced version with internal links to facilitate navigation.

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# Using NASFAA Tools to Ensure Title IV Compliance

NASFAA Website

**Professional Practice Tools**

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**NASFAA's  
Compiled Title IV  
Legislation**

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*NASFAA Compiled Title IV Legislation*

- Searchable PDF for each major subchapter of U.S. Code that relates to student financial assistance programs for higher education
- Files constructed by incorporating amendments to the law

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# Using NASFAA Tools to Ensure Title IV Compliance

## NASFAA Compiled Title IV Legislation

- Each document contains bookmarks for easier navigation
- For ED regulations that interpret and implement these sections of law, see [Compiled Title IV Regulations](#)
- For official version of the law, visit [Thomas](#) at <http://thomas.loc.gov/home/thomas.php>

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## NASFAA Compiled Title IV Legislation



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## NASFAA Compiled Title IV Legislation



Sample of § 1070a. Federal Pell Grants: amount and determinations; applications [HEA § 401]

- *Strikeout text is deleted effective with the 2011-12 award year and succeeding years;*
- *Red text is added at that time*

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# Using NASFAA Tools to Ensure Title IV Compliance



**NASFAA's  
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Regulations**

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N·A·S·F·A·A

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*NASFAA Compiled Title IV Regulations*

- Searchable PDF document
- Linked table of contents in each document
- New regulations incorporated each award year

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*NASFAA Compiled Title IV Regulations*

- Current edition is as of July 1, 2011, effective 2011-12 award year
- Revisions that become effective July 1, 2011, are shown in:
  - red (added text) or
  - ~~strikeout (like this)~~ for deleted text
- Keys applicable to individual sections of regulation are noted in the footer
- Gray shading used to denote early implementation at institution's option
- Bookmarks added to permit navigation in document

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# Using NASFAA Tools to Ensure Title IV Compliance

## NASFAA Compiled Title IV Regulations

### Part 600: Institutional Eligibility

Compiled by NASFAA 11/2010 PART 600—INSTITUTIONAL ELIGIBILITY UNDER THE HIGHER EDUCATION ACT OF 1965, AS AMENDED Since published as a compilation through December 1994, the following amendments have been incorporated into part 600: -Technical corrections of 6/30/95 - Technical corrections of 6/12/96 -Improved oversight

### Part 601: Institution and Lender Requirements Relating to Education Loans

Compiled by NASFAA 11/2010 PART 601— INSTITUTION AND LENDER REQUIREMENTS RELATING TO EDUCATION LOANS First published 10/28/09 – effective date 7/1/10 with early implementation permitted for Secs. 601.11(a),(b),(c); 601.12; 601.21; and 601.40(a) Subpart A—General 601.1 Scope. 601.2 Definitions.

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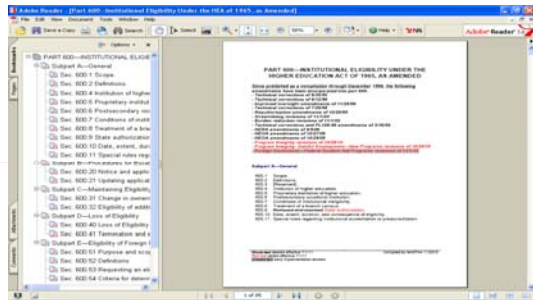
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## NASFAA Compiled Title IV Regulations



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## NASFAA Compiled Title IV Regulations



- Sec. 600.4, Institution of Higher Education
- Contains both:
  - ✓ red text indicating new language effective 7/1/11
  - ✓ strikethrough text indicating language was deleted

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# Using NASFAA Tools to Ensure Title IV Compliance

*NASFAA Policies & Procedures Tools*

**NASFAA**  
POLICIES & PROCEDURES  
**TOOLS**

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**What's in the Toolbox?**

- Tools for formatting, implementing, and evaluating policies and procedures
- *Regulatory Resources Guide* containing:
  - Explicit and implied regulatory requirements
  - Areas where schools have implementation options

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**What's in the Toolbox?**

- Tips for formatting your P&P manual
  - Page format samples
  - Style decisions
  - Master tracking document
- Guidance for reading and interpreting statutes and regulations

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# Using NASFAA Tools to Ensure Title IV Compliance

## Template Features

Click-and-type functionality to easily add your school's information

Procedures	
Describe the process of identifying those applicants or applications selected for verification. Include a statement regarding the process of identifying and verifying subsequent or additional applications. Explain how the institution will monitor the number of selected applicants to make sure verification policies are enforced and/or percentages are met.	888.54(a)
<a href="#">Click here to insert your school's procedures</a>	
Last updated: <a href="#">Click here to insert date</a>	

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## NASFAA's Self-Evaluation Guide



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## What is the NASFAA Self-Evaluation Guide?

- In-house evaluation tool for Title IV and HHS programs
- Describes majority of requirements
- Includes good practices

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# Using NASFAA Tools to Ensure Title IV Compliance

## What is the NASFAA Self-Evaluation Guide?

- Contains regulatory citations & other references
- Questions designed to easily identify areas of noncompliance
- Interactive form fields



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## Use Self-Evaluation Guide to:

- Prepare for audit and program reviews
- Affirm and/or revise financial aid operations, policies, and procedures
- Provide outline for policies and procedures manual

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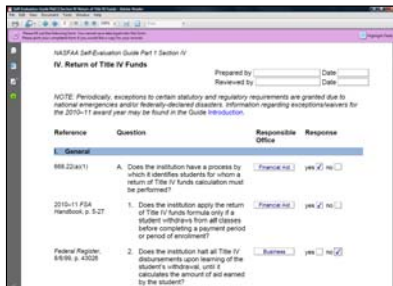
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## How to Complete the Guide



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# Using NASFAA Tools to Ensure Title IV Compliance

**NASFAA**  
*Guide to Adding New  
Academic Programs  
and Locations*

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**Adding New Programs and Locations**

- Highlights major areas schools should review when:
  - Establishing new academic programs
  - Adding locations
- Notes institutional eligibility and program eligibility considerations

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**Adding New Programs and Locations**

- Lists regulatory and statutory citations for each area reviewed
- Provides related NASFAA & Department of Education (ED) resources for further guidance

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# Using NASFAA Tools to Ensure Title IV Compliance

NASFAA's ASKREGS



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NASFAA's ASKREGS

- AskRegs service gives members personal assistance with regulatory or compliance questions
- Questions are thoroughly researched to provide a comprehensive answer, including regulatory citations

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**NASFAA's  
Using Federal  
Tax Returns  
in Need Analysis**

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# Using NASFAA Tools to Ensure Title IV Compliance

## Using Federal Tax Returns in Need Analysis

- Reference tool on how to use federal income tax returns, forms & schedules for:
  - Verification
  - Need analysis
- Updated annually by NASFAA

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## Using Federal Tax Returns in Need Analysis

- Cross-references FAFSA line items to tax returns, W-2 forms and schedules
- Describes commonly used tax forms
- Highlights use of W-2 forms for verifying certain taxable and untaxed income
- Contains *Guide to Implied Income and Assets*

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## Forms and Schedules Comparison Sample

2010 Federal Tax Forms and Schedules Comparison

Need Analysis Data Element	1040	1040A	1040EZ	FAFSA
Exemptions Claimed	Line 6d	Line 6d	Line 5	37(S) 85(P)
Adjusted Gross Income (AGI)	Line 37	Line 21	Line 4	35(S) 83(P)
Earnings from Work	Lines 7 + 12 + 18 + Schedule K-1, Box 14, Code A Form W-2, Box 1	Line 7 Form W-2, Box 1	Line 1 Form W-2, Box 1	38-39(S) 86-87(P)
U.S. Income Tax Paid	Line 55	Line 35	Line 11	39(S) 84(P)
Tax-Exempt Interest Income	Line 8b	Line 8b	N/A	44(S) 92(P)
IRA Distributions (untaxed portions)	Lines 15a minus 15b (excludes rollovers)	Lines 11a minus 11b (excludes rollovers)	N/A	44c(S) 92e(P)
Pension and Annuity Distributions (untaxed portions)	Lines 16a minus 16b (excludes rollovers)	Lines 12a minus 12b (excludes rollovers)	N/A	44f(S) 92f(P)
Tax-Deferred Payments to Pensions and Savings Plans, IRA, SEP, SIMPLE, Keogh, and Other Qualified Plans	Lines 28 + 32 Form W-2, Boxes 12a-d, Codes D, E, F, G, H, S	Line 17 Form W-2, Boxes 12a-d, Codes D, E, F, G, H, S	N/A	44a, 44b(S) 92a, 92b(P)

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# Using NASFAA Tools to Ensure Title IV Compliance



**NASFAA PUBLICATIONS**

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**NASFAA Publications**

Quick Reference Guides

- Deadlines: Direct Loan Program Year Closeout vs. Reconciliation Q & A
- 2011–12 Graduate & Professional Reference Sheet
- 2011–12 Health Professions Loans & Scholarships Reference Sheet
- 2011–12 Student Aid Reference Sheet
- Cash For College

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**NASFAA Publications**

***Student Aid Transcript***

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# Using NASFAA Tools to Ensure Title IV Compliance

## NASFAA's *Student Aid Transcript*



The *Student Aid Transcript* is the magazine of NASFAA, featuring in-depth articles by NASFAA members, policy experts, and colleagues in related industries

Vol. 22, No. 2 Summer 2011

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## NASFAA RESOURCES

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## NASFAA's *Standards of Excellence Review Program*



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# Using NASFAA Tools to Ensure Title IV Compliance

## What is the SOE Program?

- Voluntary appraisal of financial aid operations
- Assesses strengths and weaknesses
- Makes recommendations to improve Title IV operations and customer service
- Comprised of a team of your peers

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## SOE Contact Information

For a quote or more information contact:  
 Kenneth McGhee  
 Program Coordinator  
 202-785-0543  
[excellence@nasfaa.org](mailto:excellence@nasfaa.org)  
[mcgheek@nasfaa.org](mailto:mcgheek@nasfaa.org)

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## NASFAA Distance Learning

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# Using NASFAA Tools to Ensure Title IV Compliance

## Live Webinars



Live webinars bring the latest information and allow you to actively engage with NASFAA staff and featured presenters from government, partner organizations, and fellow aid administrators

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## On Demand Webinars



Recordings of previously broadcast events are available for purchase and viewing at your convenience

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## NASFAA Graduate and Professional Listserv

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# Using NASFAA Tools to Ensure Title IV Compliance

## Graduate and Professional Listserv



- Free service for NASFAA members at graduate and professional institutions
- Serves as a communications forum for issues specifically related to the administration of financial aid at Grad/Prof schools

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## Contact



**Questions?**

[powelle@nasfaa.org](mailto:powelle@nasfaa.org)

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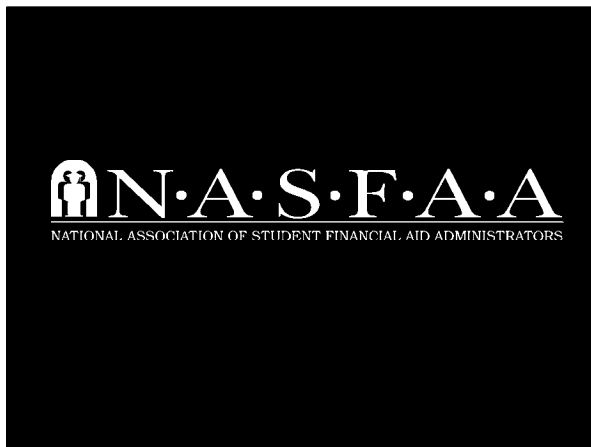
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