



NASFAA's Compliance Engine

GREG GEARHART, DIRECTOR OF FINANCIAL AID, MESSIAH COLLEGE

TIFFANY GIBBS, COMPLIANCE PRODUCTS MANAGER, NASFAA

October 7-9, 2019

PASFAA 2019 – HARVESTING KNOWLEDGE

Self-Evaluation Checklists



October 7-9, 2019

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Intended Uses of the Self-Evaluation Checklists



Self-audit tool to help prepare for outside audits and program reviews;

Develop a profile of financial aid operations for affirmation and/or revision of institutional policies, office procedures, and administrative controls;

Document the need for an operating budget, staffing, and/or physical accommodations commensurate with the size and scope of the institution's financial aid programs;

Train new staff and enhance the skills and knowledge of current staff;

Assist in the preparation of reports;

Serve as an outline for periodic checks of financial aid operations to determine progress being made in plans for improvement; and

Provide an outline of information to be included in the financial aid and/or institutional policies and procedures manuals.

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Tiffany

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MY CHECKLISTS

ASSIGNMENTS

START A NEW CHECKLIST

Unsure where to start?

Choose compliance goals below to view applicable checklists.

WHAT WOULD YOU LIKE TO DO?

- ☐ Assess our administrative capability
- ☐ Evaluate our federal grant programs
- ☐ Evaluate our federal loan programs
- ☐ Evaluate our campus-based programs
- ☐ Assess student eligibility requirements
- ☐ Assess needs of special populations
- ☐ Review supporting compliance-related materials

GET STARTED

Search and Browse Checklists

Keyword:

Keyword

☒ Include User-Entered Content

☒ Include Archived Content

SEARCH CHECKLISTS

October 7-9, 2019

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ce PASFAA SELF-EVALUATION CHECKLISTS
A COMPLIANCE ENGINE MODULE

Unsure where to start?
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- ☐ Evaluate our campus-based programs
- ☐ Assess student eligibility requirements
- ☐ Assess needs of special populations
- ☐ Review supporting compliance-related materials

[GET STARTED](#)

Choose Checklists According to Goals

Search and Browse Checklists

Keyword:

☒ Include User-Entered Content
☒ Include Archived Content

[SEARCH CHECKLISTS](#)

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ce PASFAA SELF-EVALUATION CHECKLISTS
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Search by Checklist Title or Topic

WHAT WOULD YOU LIKE TO DO?

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- ☐ Assess student eligibility requirements
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- ☐ Review supporting compliance-related materials

[GET STARTED](#)


Search and Browse Checklists

Keyword:

☒ Include User-Entered Content
☒ Include Archived Content

[SEARCH CHECKLISTS](#)

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MY CHECKLISTS
ASSIGNMENTS
START A NEW CHECKLIST

Unsure where to start?

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- ☐ Evaluate our federal loan programs
- ☐ Evaluate our campus-based programs
- ☐ Assess student eligibility requirements
- ☐ Assess needs of special populations
- ☐ Review supporting compliance-related materials

GET STARTED

Search and Browse Checklists

Keyword:

Satisfactory Academic Progress


☒ Include User-Entered Content

☒ Include Archived Content

SEARCH CHECKLISTS

View all checklists

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MY CHECKLISTS
ASSIGNMENTS
START A NEW CHECKLIST

Search Results

Enter a term to search saved and new checklists and if selected, user-entered content. You may wish to make your search term specific to limit results.

Satisfactory Academic Progi Search ☒ Include Archived Content

Keyword: Satisfactory Academic Progress

13 Results

Sorted by: Checklist Name | Date Created

Any Saved Checklists will show first

My Saved Checklists

Your search term appears in the following checklists. Select an item to work within that existing checklist, or review checklists managed by your colleagues.

Keyword: Satisfactory Academic Progress

13 Results

Sorted by: Checklist Name | Date Created

Followed by any New Checklists

New Checklists


Enter a term to search template and, if selected, user-entered content. You may wish to make your search term specific to limit results.

Federal Direct Student Loan Program - 2017-18 April 2018

Tab: Loan Limits

Item: Direct Loans - VLL

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PASFAA
**SELF-EVALUATION
CHECKLISTS**
A COMPLIANCE ENGINE MODULE

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START A NEW CHECKLIST

Satisfactory Academic Progress - 2018-19

Note: Periodically, exceptions to or waivers of certain statutory and regulatory requirements are granted due to national emergencies and/or federally declared disasters. Information regarding exceptions/waivers for the 2018-19 award year may be found in the Checklist Instructions.

Select Sub-Tab

Contents
General
Pace of Progression and Transfer Credits
Review of SAP After Each Payment Period
Review

General

Pace of Progression and Transfer Credits

Review of SAP After Each Payment Period

Note: Institutions that review SAP less frequently than after each payment period should skip this section.


Review of SAP Annually

Note: Institutions that completed the section, "Review of SAP After Each Payment Period" should skip this section.

Schools That Do Not Allow Appeals, Students Who Do Not Appeal, and Students Whose Appeals Have Been Denied

PROCEED

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PASFAA
**SELF-EVALUATION
CHECKLISTS**
A COMPLIANCE ENGINE MODULE

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MY CHECKLISTS
ASSIGNMENTS
START A NEW CHECKLIST

Satisfactory Academic Progress - 2018-19

View/Add Assignments/Comments

ASSIGN CHECKLIST ITEMS

Contents
General
Pace of Progression and Transfer Credits
Review of SAP After Each Payment Period
Review

Jump to first unanswered checklist item

Direct Links to Compiled Regulations and Other Resources

5 COLUMN(S) DISPLAY

RESOURCES	ITEM	Responsible Office	RESPONSE	DUE DATE	COMPLETE?
668.16(e) 668.42(c)(2)	A. Does the school have a financial aid satisfactory academic progress (SAP) policy that it publishes and makes readily available to current and prospective students? Add Comments	<input type="text"/>	<input type="radio"/> Yes <input type="radio"/> No		<input type="checkbox"/>
668.34(x)(1) 2018-19 FSA Handbook, Vol. 1, Ch. 1	Updated item since previous version B. Is the financial aid SAP policy the same as or stricter than the school's academic progress policy for non-Title IV recipients? Add Comments	<input type="text"/>	<input type="radio"/> Yes <input type="radio"/> No		<input type="checkbox"/>

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ce PASFAA SELF-EVALUATION CHECKLISTS A COMPLIANCE ENGINE MODULE

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[ASSIGN CHECKLIST ITEMS](#)

Satisfactory Academic Progress - 2018-19

[View/Add Assignments Comments](#)

Contents | General | **Pace of Progression** | Payment Period | Review of SAP Annually | Schc

Jump to first unanswered checklist item 5 COLUMN(S) DISPLAY

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View and Add Comments

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Jump to first unanswered checklist item 5 COLUMN(S) DISPLAY

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**Note Appropriate Office
Not an Assignment**

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Jump to first unanswered checklist item

Record Response

5 COLUMN(S) DISPLAY

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What Do the Responses Mean?

A **"yes"** response to a question indicates the institution is meeting the requirement or standard presented;

A **"no"** response means some follow-up action is necessary to ensure the requirement is met;

A **"n/a"** response should be used whenever the question is not applicable to the institution (e.g., the institution may not be participating in all of the Title IV programs); and

Comments or explanations of certain responses may be provided in the space available with each individual item.

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Satisfactory Academic Progress - 2018-19 [ASSIGN CHECKLIST ITEMS](#)

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Jump to first unanswered checklist item

Populates if Assigned

5 COLUMN(S) DISPLAY

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Jump to first unanswered checklist item

Indicate if Complete

5 COLUMN(S) DISPLAY

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Satisfactory Academic Progress - 2018-19

View/Add Assignments Comments

Organization Assignments

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Assign Items for: Satisfactory Academic Progress - 2018-19: General

Individuals you can assign tasks to are listed below. Primary contacts can visit the myNASFAA area of the NASFAA website to adjust the roster.

☒ Assign Tab ☐ Assign Entire Checklist

ASSIGN TO

Comments/Instructions

Due Date

📅

ASSIGN

An email notification will be sent immediately to the assignee.

[Assign Individual Checklist Items or Unassign Items](#)

Promote Interdepartmental collaboration.

Assign to individuals in your organization

Assign individual items, tabs or entire checklist (all tabs)

Set due date

Include message if desired

Assignments emailed to users

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View Your Checklists

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ce NISPA SELF-EVALUATION CHECKLISTS A COMPLIANCE ONLINE MODULE

Unsure where to start?
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- ☐ Assess our administrative capability
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- ☐ Evaluate our campus-based programs
- ☐ Assess student eligibility requirements
- ☐ Assess needs of special populations
- ☐ Review supporting compliance-related materials

[GET STARTED](#)

Search and
Keyword:
Keyword

- ☒ Include User-Entered Content
- ☒ Include Archived Content

[SEARCH CHECKLISTS](#)

• Checklists you started
• Checklists assigned to you
• Print Checklist data

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View Checklist Assignments

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[GET STARTED](#)

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Keyword:
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- ☒ Include Archived Content

[SEARCH CHECKLISTS](#)


• Checklists you assigned
• Checklists assigned to you
• Print assignments info

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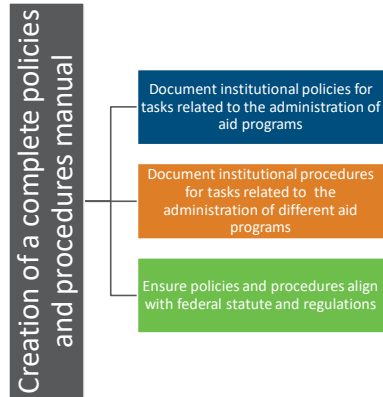
Screenshare

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Policies and Procedures
Builder 

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Intended Uses of the P&P Builder



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[GET STARTED](#)

Create Policies and Procedures Manuals

Search and Browse Checklists

Keyword:


☒ Include User-Entered Content
☒ Include Archived Content

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[MY MANUALS](#)
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[START A NEW MANUAL](#)

Start A New Manual

When naming your manual, we suggest including the academic year in your manual name, such as "University of School's 2016-17 Policies & Procedures." Proceed to enter your manual content. After you've selected "Save" or "Save and Proceed" in any section, your manual will be available in your My Manuals dashboard. Once saved, P&P manual components can be assigned to staff on your institution/organization roster and, across departments. We welcome your feedback and suggestions via the [Compliance Engine Feedback Form](#).

NASFAA is pleased to offer an option for schools that want help with this work from experienced professionals. [Financial Aid Services \(FAS\)](#), NASFAA's preferred provider for P&P conversions, has tenured consultants with deep financial aid knowledge who can do the heavy lifting for you.

Enter a custom name for your institution's Policies & Procedures Manual:

☐ Limit access of this manual to owner and assignees, only. Other users in your organization will not be able to view this item, but the manual will still appear in organization lists. Owners and Primary Contacts are able to transfer ownership of items with this setting.


☒ Allow anyone from my organization read-only access to this manual. Owner and assignees can make changes, owners and Primary Contacts can transfer ownership.

[CREATE A NEW MANUAL](#)

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[View Manuals and Assignment Summaries](#)

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[CREATE A NEW MANUAL](#)

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Enter Content into Template

RESOURCES
ITEM Show All Item Comments Expand All Items Collapse All Items
DUE DATE COMPLETE?

4.1 PRIVATE EDUCATION LOAN DISCLOSURES
0

Policies

601.2(b)
601.11(a)-(c)

If the institution or any of its institution-affiliated organizations provides information regarding a private education loan from a lender to a prospective borrower, the institution or institution-affiliated organization also must provide the following disclosures regardless of whether a preferred-lender arrangement exists:

- Information required under section 1238(e)(1) of the Truth in Lending Act (TILA) for private education loans
- The borrower may qualify for loans or other assistance under Title IV programs
- The terms and conditions of loans under the Title IV programs may be more favorable than those of private education loans

The financial aid office staff should be aware of institutional policies and practices for providing information about private education information prospective borrowers. Identify any administrative office, academic office, and institution-affiliated organization that provide information about loans to prospective borrowers.

Procedures

Explain how institutional offices and institution-affiliated organizations are made aware of the disclosure requirements. Describe procedures for making the required disclosures, when they must be made, and in what format. Identify who is responsible for ensuring the information about private education loans is presented distinctly from information about Title IV loans, monitoring any change in the disclosure requirements, updating the disclosure information as needed, and making the disclosure information available to each institutional office and institution-affiliated organization. If another office is responsible, you may want to cross-reference this office's policies and procedures.

Paragraph
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Populates if Assigned

RESOURCES
ITEM Show All Item Comments Expand All Items Collapse All Items
DUE DATE COMPLETE?

4.1 PRIVATE EDUCATION LOAN DISCLOSURES
0

Policies

601.2(b)
601.11(a)-(c)
Federal Register, 10/28/09, p. 55628
2017-18 PSA Handbook, Vol. 2, Ch. 5

Updated item or resource from last year's version.

If the institution or any of its institution-affiliated organizations provides information regarding a private education loan from a lender to a prospective borrower, the institution or institution-affiliated organization also must provide the following disclosures regardless of whether a preferred-lender arrangement exists:

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Procedures

Explain how institutional offices and institution-affiliated organizations are made aware of the disclosure requirements. Describe procedures for making the required disclosures, when they must be made, and in what format. Identify who is responsible for ensuring the information about private education loans is presented distinctly from information about Title IV loans, monitoring any change in the disclosure requirements, updating the disclosure information as needed, and making the disclosure information available to each institutional office and institution-affiliated organization. If another office is responsible, you may want to cross-reference this office's policies and procedures.

Paragraph
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RESOURCES

ITEM

Show All Item Comments

Expand All Items

Collapse All Items

Indicate if Complete

DATE

COMPLETE?

4.1 PRIVATE EDUCATION LOAN DISCLOSURES

Policies

601.2(b)

601.11(a-c)

Federal Register, 10/28/09, p. 58628

2017-18 FSA Handbook, Vol. 2, Ch. 5

Updated item or resource from last year's version.

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The financial aid office staff should be aware of institutional policies and practices for providing information about private academic office, and institution-affiliated institution's policies for providing information

Paragraph

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NEXT

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P&P BUILDER

A COMPLIANCE ENGINE MODULE

XYZ University 2019-20

View/Add Assignments Comments

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Assign items to others

START A NEW MANUAL

ASSIGN P&P ITEMS

Section 2: Administrative Organization and Office Management

Section 3: Financial Aid Programs

Section 4: Institutional Requirements Relating to

3 COLUMN(S) DISPLAY

RESOURCES

ITEM

Show All Item Comments

Expand All Items

Collapse All Items

DUE DATE

COMPLETE?

4.1 PRIVATE EDUCATION LOAN DISCLOSURES

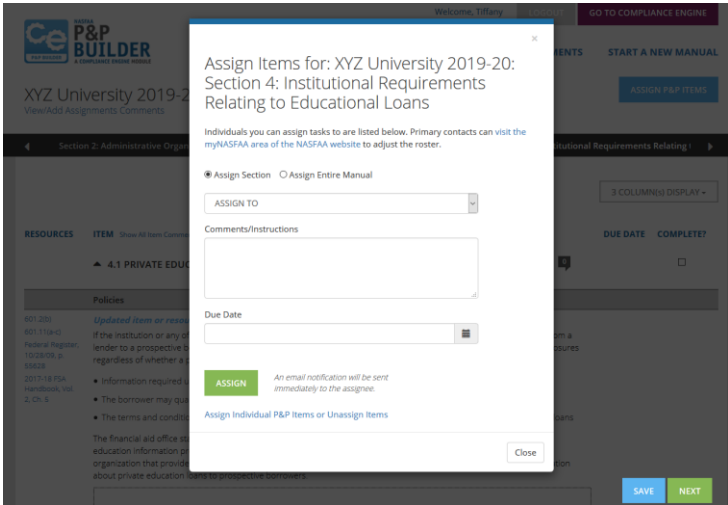
4.2 PREFERRED LENDER ARRANGEMENTS

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Assign Items for: XYZ University 2019-20:
Section 4: Institutional Requirements
Relating to Educational Loans

Individuals you can assign tasks to are listed below. Primary contacts can visit the myNASFAA area of the NASFAA website to adjust the roster.

☒ Assign Section ☐ Assign Entire Manual

ASSIGN TO: [Dropdown Menu]

Comments/Instructions: [Text Area]

Due Date: [Date Picker]

ASSIGN An email notification will be sent immediately to the assignee.

Assign Individual P&P Items or Unassign Items

Close


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Screenshare

Cost

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Self-Evaluation Checklist Module = Free member benefit!



P&P Builder = \$99 or Included with Value Plus Membership!

Request a Demonstration of the P&P Builder



The screenshot shows a web browser window with the URL <https://www.pasfaa.org/online-feedback>. The page is titled "Compliance Engine Feedback Form". On the left is a sidebar with "Tools & Resources" including links to ASKREGS, COMPLIANCE RESOURCES, CREATE A FINANCIAL AID TIMELINE, DIRECTOR DOWNLOAD, DIRECTORIES & LISTSERV, LAW & REGULATION, MEMBER-GENERATED CONTENT LIBRARY, PUBLICATIONS, STANDARDS OF EXCELLENCE PROGRAM, STATE & REGIONS, STUDENT AID INDEX, SHOP, and BLUE ICON ADVISORS. The main form area contains a message: "We value our members' feedback and suggestions regarding the NASFAA Compliance Engine. Please use this form to submit feedback and suggestions and NASFAA staff will be in touch shortly." Below this are input fields for First Name (Tiffany), Last Name (Gibbs), Email address (gibbs@nasfaa.org), and Phone Number (0202 785-0453). The Feedback Category dropdown is set to "Request Demo". There is a large text area for "Your Feedback:" and buttons for "SUBMIT" and "Clear Form".

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