

APPENDIX A PRIORITIZED COMPLIANCE EXCEPTION CORRECTIVE ACTION CHECKLIST

✓	Compliance Exception	Office Responsible	Corrective Action	Assigned To	Priority	Due By
<i>Institutional Eligibility</i>						
1.	The College does not review its drug prevention programs biennially.	Health and Wellness		Lori Castro-		
2.	SLCC does not have a student loan code of conduct.	Financial Aid and Student Loans & Receivables	Create student loan code of conduct.	Director	1	June 30
<i>Administrative Capability</i>						
3.	<p>The financial aid office's (FAO) verification policies and procedures are incomplete. Missing elements include:</p> <p>³⁵₁₇ How students are notified of the verification results;</p> <p>³⁵₁₇ Consequences of failing to submit verification documents by the established deadline;</p> <p>³⁵₁₇ Procedures to correct erroneous information;</p> <p>³⁵₁₇ Procedure for providing selected applicants a clear and timely explanation of their responsibilities;</p> <p>³⁵₁₇ Treatment of C-codes; and</p> <p>³⁵₁₇ Review and treatment of subsequent Institutional Student Information Record (ISIR) transactions.</p>	Financial Aid Office	Update Policy and Procedure Manual	FAO Management Team	2	June 30

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4.	The College requires students who fail to meet SAP standards and want to appeal to submit a statement regarding why he or she failed to meet SAP standards. The statement must include what has changed in the student's situation to allow him or her to meet SAP at the next evaluation. SLCC's SAP policy does not include a description of this required appeal information.	Financial Aid Office	Update Policy and Procedures Manual	Director	3	June 30
<i>Application Processing and File Review</i>						
5.	The FAO does not review ISIRs after a student has been packaged. Lack of review includes subsequent ISIRs selected for verification and ones with actionable comment codes.	Financial Aid Office	Create process to identify students with subsequent ISIRs. Create procedure to review these and determine outcome.	Advisors Specialists Michelle Walton	4	June 30
6.	This student's loan period academic year dates does not match the College's academic term dates.	Financial Aid Office	Error had been discovered prior to SOE Review and has been corrected.	Michelle Walton	--	Completed
7.	This student's Federal Pell Grant award was reduced to an incorrect amount when she changed enrollment status.	Financial Aid Office	Create Quality Assurance review of awards.	Advisors and Management Team	5	July 15
8.	During file review it was identified that the Federal Pell Grant award was deleted for a student, who had reached the maximum Lifetime Eligibility Used (LEU), but the "Offered" and "Accepted" amounts were not changed to 0.	Financial Aid Office	See #7 above			

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9.	This student's Federal Direct Subsidized Loan was reduced even though she had not met her maximum annual or aggregate subsidized loan limit.	Financial Aid Office	See #7 above.			
<i>Packaging and Awarding</i>						
10.	The FAO does not use the \$300 overaward tolerance to resolve a Title IV overaward involving campus-based funds when a student has received additional aid.	Financial Aid Office	Create policy and train advising staff on use of \$300 tolerance	Management Team	6	June 30
11.	The College does not have a written overaward policies and procedure so overawards are not being consistently resolved.	Financial Aid Office	Update Policy and Procedures Manual.	Director	7	June 30
<i>Cash Management and Disbursement</i>						
12.	The FAO does not have policies and procedures for making late disbursements of Title IV funds.	Financial Aid Office	Create policy and procedures.	Technology Staff and Director	8	June 30
13.	The FAO does not have a parent PLUS authorization form to obtain a parent's authorization to use parent PLUS funds to pay student charges.	Financial Aid Office	Create authorization form	Technology Staff		Completed
<i>Return of Title IV Funds</i>						
14.	SLCC faculty does not consistently report student does not begin class attendance or unofficial withdrawals so a R2T4 calculation can be performed within the required timeframe.	ORAR & AVP of Student Enrollment Services				

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<i>Financial Aid Program Administration</i>						
15.	The FAO does not maintain policies and procedures for awarding FWS.	Financial Aid Office	Create policies and procedures	FCWS Advisor/Asst Dir South Region	9	May 31
16.	The FAO made some FSEOG awards for \$22 and \$89, which are below the regulatory minimum of \$100.	Financial Aid Office	Review packaging policy in P&P and in Banner. Conduct advisor training	AD-Technology and Director	10	June 30
17.	The FAO does not add parent PLUS fees to the student's COA if a dependent student's parent is borrowing a parent PLUS.	Financial Aid Office	Update P&P and create procedure for adding fees after PLUS is awarded.	Technology Staff	11	Completed
<i>Student Consumer Information</i>						
18.	The College does not always refer to Title IV programs as federal programs.	Financial Aid Office	Correct information on website and publications	Advisor – Jordan and Director	12	June 30
19.	The College does not provide the following R2T4 information: ³⁵ ₁₇ The institution's and the student's responsibilities for returning Title IV funds; and ³⁵ ₁₇ Any applicable deadlines.	Financial Aid Office	Update website and publications	Advisor – Jordan, AD – Technology and director	13	June 30
<i>Family Educational Rights and Privacy Act</i>						
20.	The College does not have written policies and procedures regarding the redisclosure of personally identifiable information requirements	Office of the Registrar and Academic Records				

**APPENDIX B
PRIORITIZED RECOMMENDATION IMPLEMENTATION CHECKLIST AND ACTION PLAN**

✓	Recommendation	Office Responsible	Action Plan	Assigned To	Priority	Due By
<i>Institutional Eligibility</i>						
1.	When SLCC is the host school for a consortium student, it is noted as a comment in Banner. If the student submits a Free Application for Federal Student Aid (FAFSA) to SLCC and is not selected for verification, they will be packaged. The financial aid office (FAO) should collaborate with the information technology (IT) office to develop a code that will prevent the student from auto packaging.	Financial Aid Office and IT	Work with IT to implement new coding	Advisor – Consortium Agreements and AD-Technology		August 15
<i>Administrative Capability</i>						
2.	During all staff focus groups, concerns were expressed in several areas related to financial aid office (FAO) communications. These concerns included: ³⁵ ₁₇ Unproductive staff meetings; ³⁵ ₁₇ Repeatedly requesting information, decisions and/or action and having to wait an excessive amount of time for a response (or never receiving any response at all); and ³⁵ ₁₇ A general disconnect regarding the sharing of information on a regular basis.	Financial Aid Office	Solicit suggestions from staff for on-campus speakers Insure all decisions are disseminated at staff meeting or by general email.	Director	1	Partially completed Completed Completed

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	The financial aid director should schedule regular staff meetings with agendas and minutes to provide documentation and consistency in decision making. Organized staff meetings give staff an opportunity to express their opinions and offer suggestions, as well as to have their issues addressed.		Staff meetings are already scheduled for the 3 rd Wednesday of each month. An agenda is created and minutes are sent out within one week of the meeting.			Completed
3.	The FAO should create a short and long term strategic plan that incorporates ideas from internal and external staff members. The FAO would benefit from strategic planning to be used as a guide for improved processing. Strategic planning should be conducted in a manner that reflects institutional goals and objectives. The plan should include specific goals, a time frame for accomplishing those goals, and a specific person accountable for each objective. The management team should meet quarterly to review and monitor progress and make adjustments as needed.	Financial Aid Office	Beginning with December retreat, work on short- and long-range plans that are created by all staff.	Management Team	3	September 1
4.	SLCC should schedule a minimum number of self-assessments or self-evaluation topics to review annually. Each year those departments involved in the orderly operation of Title IV programs should complete two or three of the Department of Education's (ED's) <i>Federal Student Aid (FSA) Assessments</i> . These assessments are	Financial Aid Office	Assign assessments to Assistant Directors and specific advisors during April evaluations.	Director	4	April 15 (assign) Complete assignment by December 15, 2015

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	<p>available on the ED website (http://www.ifap.ed.gov/qahome/fsaassesment.html).</p> <p>NASFAA's <i>Self-Evaluation Guide</i> also is a good tool to evaluate the effectiveness of financial aid functions, enhance compliance awareness, reduce risk, improve staff knowledge and identify areas for additional training</p>					
5.	<p>The financial aid director should develop and implement an ongoing structured training program for new and existing employees. Training should assess and address all level of employees' needs in addition to cross-training staff on critical Title IV program functions When developing its training program, the financial aid office should explore using NASFAA and ED training materials and webinars, including NASFAA's <i>CORE</i> training materials and NASFAA University online courses as well as <i>FSA COACH</i> web-based training.</p>	Financial Aid Office	Create training programs	AD – Compliance and Training		December 15
6.	<p>Using the NASFAA <i>Policies & Procedures Tool</i> as a guide, the College should review its current policies and procedures and develop missing ones. Once the manual is completed it should be put on an intranet drive allowing all employees involved in Title IV operations to access it. Additionally, as a best practice, each year</p>	Financial Aid Office	Update Policies and Procedures Manual	Director, Assistant Directors, other employees based on job responsibilities	2	June 30

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	the manual should be archived for audit purposes and a new year-specific manual started.					
7.	Staff and supervisory focus groups expressed concerns about communication flow between financial aid and the other student services offices. Confusion exists in communicating what the various offices do. The financial aid office should engage in regularly scheduled meetings, perhaps quarterly, but at least annually, with other student service area offices to promote information sharing and coordination of services and data.	Financial Aid Office	See #2 above			
8.	Students whose satisfactory academic progress (SAP) appeals are denied by the SAP committee are allowed to have their denials reviewed by the financial aid director and assistant vice president. The SAP appeals committee should have the final authority to approve or deny student appeals		After discussion, the Financial Aid Office chooses not to implement this recommendation.			
<i>Application Processing and File Review</i>						
9.	Incomplete documents are scanned into Nolij (imaging system) and the item is marked incomplete on RRAAREQ and the paper copy is kept. Since the file cannot be verified until all documentation is received, it seems unnecessary to save the incomplete paper document.		After discussion with the specialists, many have made the decision to shred the paperwork after a specific time. Others like the comfort level of keeping them.			

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10.	The FAO should add a line to the verification form asking for student/spouse and parent (for dependent students) wages and space to ask for zero income documentation. Students who do not have W-2 forms can explain their source(s) of income without completing another form.		After discussion, the Financial Aid Office chooses not to implement this recommendation.			
11.	The FAO uses institutional forms to collect some of the same student information found on the FAFSA. For example, one form asks if the student is interested in work-study. The information technology (IT) office can add this information from the FAFSA to the Banner packaging rules. All institutional forms should be reviewed and determined if the information is available elsewhere and can be pulled through a report or if the information is even necessary to collect.		After discussion, the Financial Aid Office chooses not to implement this recommendation.			
12.	The peer review team was unable to confirm the FAO always uses the correct EFC when packaging students who enroll for one semester. The staff should review its policies and procedures for processing federal aid for students enrolled for one term.		After discussion, the Financial Aid Office chooses not to implement this recommendation.			

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13.	The FAO sends one missing documents email after the student's Institutional Student Information Record (ISIR) is loaded into Banner. Then after the term starts they send another email to registered students who have outstanding documents. The FAO should send a second missing information email two weeks after the first and then another one two weeks thereafter.		After discussion, the Financial Aid Office chooses not to implement this recommendation.			
<i>Packaging and Awarding</i>						
14.	Both financial aid advisors and assistant directors should review and process reconsideration appeals.		After discussion, the Financial Aid Office chooses not to implement			
15.	The IT staff should create a report that compares students' admission residency status with the state residency listed on the ISIR. In-state students may be packaged with an out of state budget which in turn if not caught could create an overaward.		After discussion, the Financial Aid Office chooses not to implement this recommendation.			
16.	The FAO should notify those students who are ineligible for federal aid. In addition, these students should be informed of non-need based financial aid options.	Financial Aid Office	Create automated procedure to notify students	Technology Staff	5	August 1

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17.	FSEOG is awarded to students with a zero EFC until the funds are depleted, which is usually by the first or second packaging run. Many zero EFC students do not receive an FSEOG award. The FAO should run simulations to see how many more students would receive FSEOG awards if the amount awarded is decreased.	Financial Aid Office	Create reports to collect information on different awarding amount scenarios.	Assistant Director – Technology and Director		August 1
18.	The FAO should auto package loans and discontinue requiring students to complete the student information form to be considered for a federal loan.		After discussion & review of current default rates, the FAO chooses not to implement this recommendation.			
19.	The sign in the financial aid lobby states “November 14 is the last day to turn in your Fall Direct Loan request”. Per federal regulations, a student who has submitted a FAFSA can have a federal student loan originated up until his/her last day of enrollment. Based on this, the sign should be changed to either reflect the correct date or indicate it is recommended the loan form be turned in by November 14 rather than it being a deadline.	Financial Aid Office	Discuss new procedures with Loan Specialist and determine most efficient way to implement this recommendation.	Technology Staff and Director.	6	August 1
20.	Using a tool such as Survey Monkey, the SLCC should survey students to determine the actual amounts spent for rent, food, utilities, etc.	Financial Aid Office	The office had already decided to conduct a survey to construct budgets for 2015-17	All staff	7	February 1, 2016

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21.	The financial aid staff manually reviews each student's NSLDS data prior to awarding summer aid. There are over 2,000 students for which this is done. The FAO should collaborate with the IT staff to automate this process in Banner. The system can automatically load all students who have registered for summer school and batch load their NSLDS data. Using that information, the students can be auto packaged.					
22.	The FAO should develop a policy and procedure by which it notifies students of an overaward situation by using email or U.S. mail.					
<i>Cash Management and Disbursements</i>						
23.	The FAO and business office should review their uncashed federal check policies and procedures regarding stale-dated checks to ensure consistency. During focus group interviews there appeared to be inconsistencies in how the two offices handled uncashed federal aid checks.					
24.	The College should review Title IV bank statements to ensure any interest earned over \$250 during the award year is returned to ED.					

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<i>Return to Title IV (R2T4)</i>						
25.	Since the R2T4 worksheet is completed on a computer, it is unnecessary to print the form and then scan it to Nolij. The form should be scanned as a PDF and saved to Nolij directly.					
<i>Financial Aid Reporting and Reconciliation</i>						
26.	The FAO and the business office perform monthly and year-end reconciliation separately. However, documentation to support jointly reconciled was lacking. The peer review team found this practice confusing and lacking in transparency. Minimally, at year-end there should be one document that ties together all reconciliation totals with supporting documentation which is transparent so that no explanation is needed.					
<i>Technology Utilization, Systems Processing, and Functionality</i>						
27.	Scholarship opportunities are listed on the SLCC website. To apply, a student must download the each scholarship application, complete and submit it with other required documentation. For the Entering Students Scholarships, the student must submit several copies of the one page application, each with a transcript attached, to be considered for the multiple scholarships offered. This process is very labor-intensive, both for					

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	the student and the FAO. The College should automate the scholarship application process. Software products are available to provide this functionality, including such features as one online application for all scholarships, which, behind the scenes, matches students to the specific scholarships for which they may be eligible.					
28.	A Banner report should be written and run on at least a semester basis to ensure the offered and accepted amounts in Banner match with the paid column					
29.	The FAO should provide a sign-in kiosk for students to swipe their SLCC ID card into [or enter their name and student ID/Social Security Number (SSN) if they don't have their card]. The front counter person would bring up the student's record on Banner and then call out the student's name (first name and last name initial only - e.g., John L.) to come forward. The front counter person would still ask to see a photo ID for protection.					

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30.	Several staff in the focus group expressed concern that their computers were not adequate to support their job functions. In addition, there was concern about an inadequate number of peripherals such as scanners and printers to support office operations. The College should review all staff workstations for adequate equipment. A computer replacement plan should be established to upgrade computers on a scheduled basis (perhaps every three years). SLCC should also evaluate the number of peripherals to ensure there is an adequate number in the office.					
31.	SLCC uses another software system to perform R2T4 calculations even though Banner has this functionality. The College should contact other Banner schools regarding what it would take to program Banner for this process. If this analysis shows that the Banner functionality would work the College should utilize it instead of the outside software currently being used.					
32.	The IT staff should collaborate with the FAO to customize the My Page experience for students. My Page should contain a student's COA and financial aid awards so a PDF attachment would not need to be emailed students.					

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33.	When their financial aid award(s) have changed, students are notified to review My Page and are also sent a new PDF of the change. The FAO should use Banner to generate student email notifications using the ROAMESG function.					
34.	The financial aid office should develop a communication plan to provide timely student correspondence. A good communications plan anticipates needed information and proactively sends it to targeted groups. For document tracking, a communication plan should have a succession hierarchy by which the message requesting missing information intensifies or is delivered through different methods when students fail to respond to requests. All correspondence should be logged into Banner and then reports or jobs set to indicate or send what subsequent communication should be sent.					

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<i>Student Consumer Information</i>						
35.	The College should create a central location on its website for all student consumer information. Having a central link where all student consumer information is located; allows students easier access to the information they are seeking. The data can still live in and be updated in its native area, with links to it on the central location. The required annual notice can be sent to students instructing them where to find all of the required information on the website.					
36.	The FAO should include a link on the award notice to the terms and conditions of the student's award.					
37.	Each academic department is responsible for its published GE information. The information provided appears to vary in format and location by program. Each program should provide GE information in the same format and location. An individual should be tasked to oversee all reporting.					
38.	The College does not provide verification information on the financial aid webpage. As a best practice the FAO should include verification information with other financial aid information on the financial aid webpage.					

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39.	The College should document and publish Constitution Day activities for reference.					
40.	The FAO should provide information about what causes overawards and how they can be resolved. This information should be made available on the website and in all printed financial aid materials.					
<i>Family Educational Rights and Privacy Act</i>						
41.	The FAO should secure documents that are not scanned and purged. At times, these documents are left out on employees' desks.					
<i>Human Resources and Facilities</i>						
42.	The financial aid office staff and supervisors should participate in team-building activities. These activities could be as simple as a ten-minute icebreaker at the beginning of staff meetings to other more in-depth activities such as personality assessments (e.g., Myers-Briggs) and discussion of how best to communicate with different personality types or gaining a greater awareness of how other personality types are likely to react or operate.					

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43.	<p>The financial aid staff should collaborate to revise its financial aid mission statement and guiding principles. Ideally, a third party (i.e., a college counselor or instructor whose expertise includes teambuilding) should be involved in this exercise to lend unbiased support. All staff members should have equal opportunity to provide input. The results should be a product of consensus. The statement should be prominently displayed for departmental guidance and reference.</p>					
44.	<p>The FAO should collect data in order to make the best decision regarding financial aid processes.</p> <p>For example, financial aid staff told the SOE team that financial aid staff performs verification with the student present for 40 percent of the applications being verified. If this number is correct, it would appear this practice results in long lines of students waiting to see staff. Another example is staff not responding to students emails anywhere from a week to a month later, depending upon the time of year.</p>					

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45.	<p>The College should review FAO staff organization and make changes made for greater efficiency and more effective use of human resources. Some issues to be reviewed include the following:</p> <p>³⁵₁₇ The financial aid office needs a position to oversee all operational matters. This person should not be the financial aid director but rather someone who has overall authority and responsibility to ensure all processing and technical aspects are running smoothly and to troubleshoot problems;</p> <p>³⁵₁₇ The identified “chain of command” for staff members to get answers to their questions does not work well because there are other individuals not in the “chain of command” who have more information than direct supervisors;</p> <p>³⁵₁₇ Staff are not aligned to address all student issues regarding outreach sites; and</p> <p>³⁵₁₇ Staff may not be aligned well in relation to specific financial aid tasks (e.g., cohort of staff dealing with SAP appeals).</p>					

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46.	The assistant financial aid directors are responsible for returning emails and phone calls. Some emails and returned phone calls can take up to one to two weeks during slow periods of financial aid activity. During peak times, returning phone calls and responding to emails can take up to a month. The hierarchy of staff answering the general email messages and incoming phone calls should be reviewed and redistributed according to knowledge level.					
47.	A panic button should be installed at the front counter workstations that staff can discreetly press if there is a dangerous situation. Pushing the button should automatically alert both financial aid management and the public safety department that immediate attention is needed.					
48.	The College should examine the financial aid office lobby space to allow front counter staff to counsel students and parents in a more private environment.					

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<i>Customer Service</i>						
49.	<p>The FAO's philosophy promotes personal service for students who are in need. So this model can be sustained, it is critical the office review and, as needed, revise its processes to ensure wherever possible, the processes promote students' self-reliance. By doing so, the majority of the students who do not need personal attention can complete any requirements without taxing financial aid office staff resources, thus allowing those resources to be more ready available to the students who truly need it.</p> <p>In addition to generally recommending that all processes involving students in the office be evaluated and potentially re-engineered (and/or communications updated, etc.) to provide for more student self-reliance, the practice of providing one-on-one verification services should be reviewed closely. As part of this review, the office should look towards redesigning verification forms and instructions, changing communications wording and frequency, etc., so students can more easily complete the process without intervention. Included in this would also be an awareness campaign including promoting such things as faxing completed documents to the office rather than dropping them off in person.</p>					

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50.	<p>When the FAO receives a rejected Institutional Student Information Record (ISIR), the student receives an email stating his/her FAFSA information has been rejected. The student is instructed to call ED and a phone number is provided. The email should be changed as follows: The Department of Education's Central Processing System has rejected some of your Free Application for Federal Aid data. To correct any errors or provide additional information you should:</p> <p>³⁵₁₇ Login into the Free Application for Federal Student Aid (https://fafsa.ed.gov/);</p> <p>³⁵₁₇ Review error code(s); and</p> <p>³⁵₁₇ Correct and/or provide any additional information needed to process your FAFSA information.</p>					

