



How NASFAA's Policy and Procedure Manual Can Save Your Department

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Why Do We Need Policies & Procedures?

- The Department strongly recommends P&P manuals to cover the entirety of the school's participation in FSA programs.
- It is critical to establishing internal controls.
- It helps ensure effective and efficient operation of a school's FSA programs.
- Employees will receive a clear message from senior administrators that control responsibilities must be taken seriously.

Why Do We Need Policies & Procedures?

- Helps employees understand their own roles in the internal control system.
- Helps employees understand how individual activities relate to the work of others.
- It's a means of communicating significant information to those administrators who can affect change.
- P&Ps are provided to auditors, program reviewers and for E-APP Recertification

What Are Control Activities?

- Policies and Procedures that help ensure a school's administrative directives are followed.
 - Help guarantee that the actions necessary to reduce risk are carried out
 - Occur throughout an organization and include a range of activities:
 - Approvals
 - Authorizations
 - Verifications
 - Reconciliations
 - Periodic reviews of performance
 - Security of funds
 - Separation of functions

What are Control Activities?

- Control Activities usually involve two elements:
 - A policy that establishes what should be done
 - Procedures to implement the policy
- Policies and Procedures should be written
 - Should be part of new employees' orientation
 - Periodic training tool for continuing employees

Address the Following Questions in your Procedure

- Who is involved in implementing the procedures?
 - There may be a third-party process that is a step in your procedures; a student or staff member may also have some sort of involvement in the steps to complete any policy and procedure requirements.
- What needs to occur in order to implement key processes associated with a procedure?
 - It is recommended that you outline your process in quick easy bullet steps. You can use any procedure as a desk reference to help training new staff in understanding the steps it takes to perform any function if you use this process.

Address the Following Questions in your Procedure

- When does it happen?
 - Most of the Title IV, HEA processes have some sort of timeline that is associated to implementing a P&P. Review the current FSA Handbooks, Electronic Announcements, Dear Colleague Letters, etc.
- Why does it happen?
 - Each year the new Handbook comes out with updated guidance that may require you to make updates to your current P&P.
- How does it happen?
 - It does not happen automatically! Someone has to do something to start and then complete the process.

What Policies & Procedures are Needed?

- FSA Handbook 2021-2022, Vol 4, Appendix B, Page 4-207 Policy and Procedures Manuals
- Who's responsible for development?
- What are your methods for updating information and documentation?
- Other examples:
 - Satisfactory Academic Process
 - R2T4 Process
 - Professional Judgment
 - Verification

Available Resources

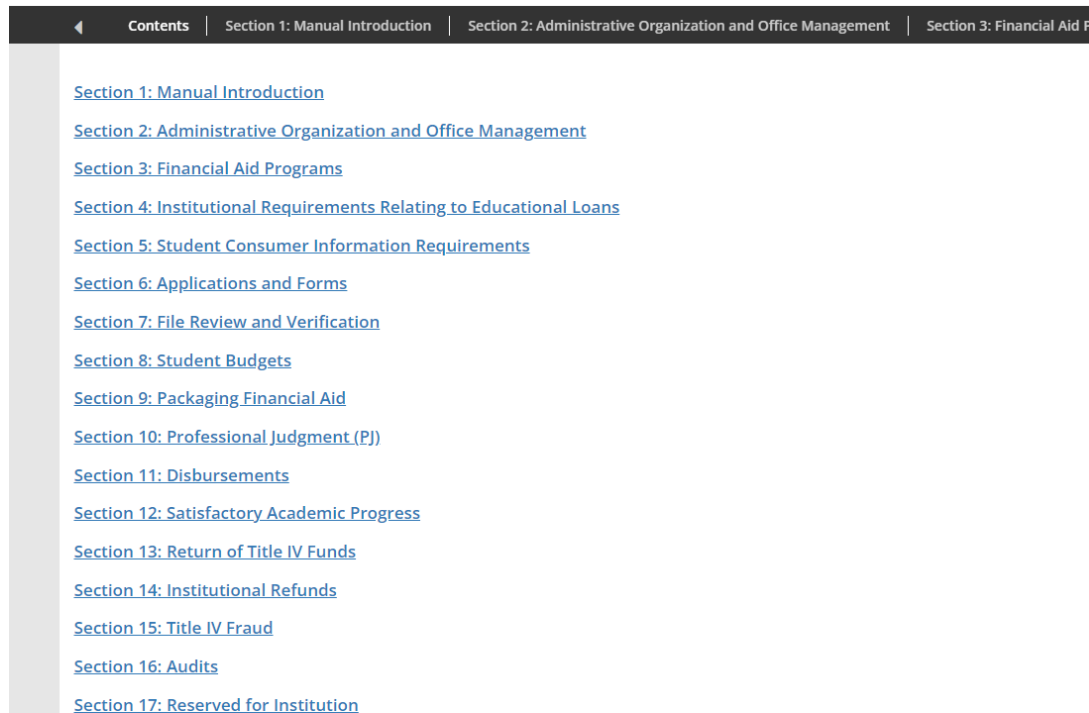
- NASFAA Compliance Resources: Policies & Procedure Builder
 - Comes with your Value Plus-level membership or it can be purchased as an add on to a Standard or Value level membership.
- FSA: A Guide to Creating a Policies and Procedures Manual
 - <https://fsapartners.ed.gov/knowledge-center/library/fsa-assessments/2022-04-13/guide-creating-policies-and-procedures-manual#>

Who's responsible

- Each person write their own section and add or provide their update to someone to add
- Word document and PDF. Create as a Word document and save as both a Word document and PDF.
- Timing and when to update

Getting Started with the P&P Builder

Florida State College at Jacksonville Policies and Procedures Manual
2021-2022



Contents	Section 1: Manual Introduction	Section 2: Administrative Organization and Office Management	Section 3: Financial Aid Programs
Section 1: Manual Introduction			
Section 2: Administrative Organization and Office Management			
Section 3: Financial Aid Programs			
Section 4: Institutional Requirements Relating to Educational Loans			
Section 5: Student Consumer Information Requirements			
Section 6: Applications and Forms			
Section 7: File Review and Verification			
Section 8: Student Budgets			
Section 9: Packaging Financial Aid			
Section 10: Professional Judgment (PJ)			
Section 11: Disbursements			
Section 12: Satisfactory Academic Progress			
Section 13: Return of Title IV Funds			
Section 14: Institutional Refunds			
Section 15: Title IV Fraud			
Section 16: Audits			
Section 17: Reserved for Institution			

- You can assign P&P items
 - Sections or individual items
 - Add comments/instructions
 - Due Date

A Guide to Creating a Policies and Procedures Manual

Print

Tags

FSA Assessments

SUBJECT: A Guide to Creating a Policies and Procedures Manual

This assessment outlines the minimum policies and procedures requirements for administering Title IV Aid.

Policies and Procedures Activities At-A-Glance identifies areas outlined in the law and regulations that require a written policy and procedure and also provides links to the regulations. If you identify areas requiring a corrective action, we recommend that you complete an Action Plan.

Activity Bar:

Policies and Procedures Activity 1: Developing or Enhancing Procedures

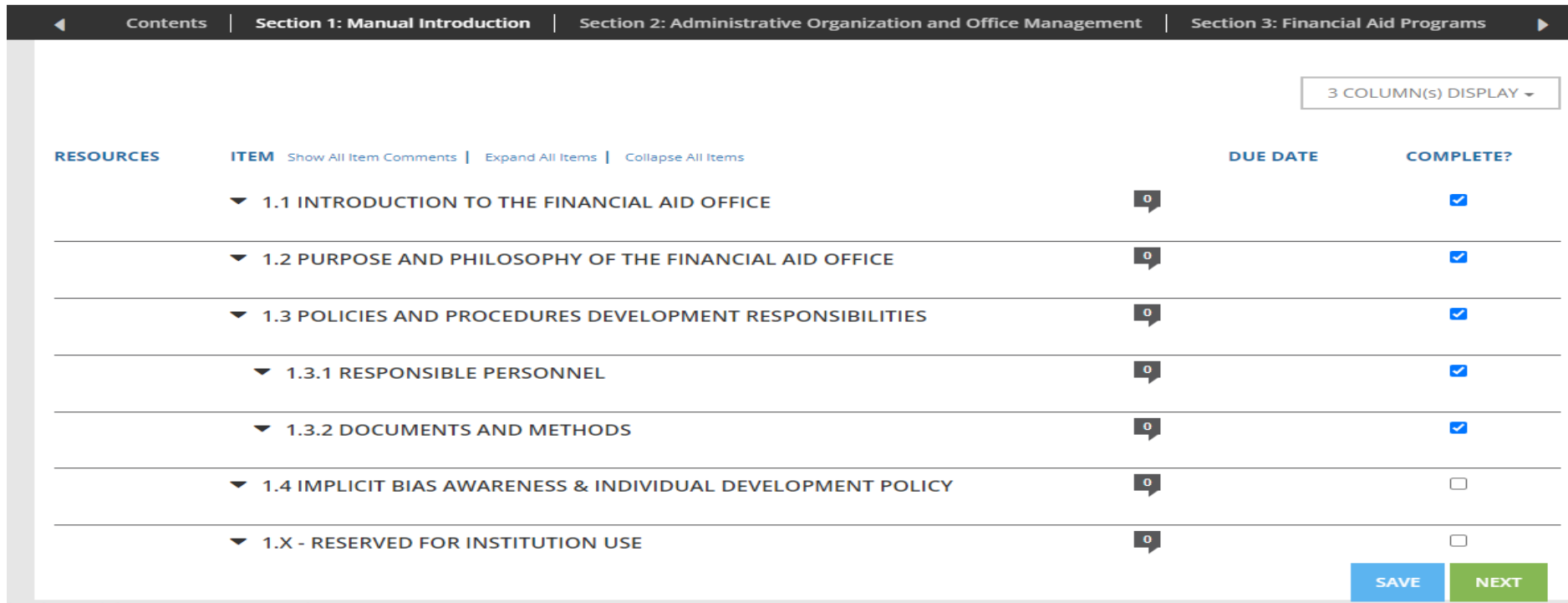
Policies and Procedures Activity 2: Preparation for an Audit or Program Review

Section	Description	Activity
Cover page and Table of Contents	A Cover Page that can be used when designing your Policies and Procedures Manual.	Policies and Procedures Activity 1: Developing or Enhancing Procedures
Introduction and Section 1	Administrative Capability	
Section 2	Institutional Eligibility	Policies and Procedures Activity 2: Preparation for an Audit or Program Review
Section 3	General Provisions Regulations	
Section 4	Federal Perkins Loans Program	
Section 5	FWS and Job Location and Development Program	
Section 6	Federal SEOG Program	
Section 7	Federal Pell Grant Program	
Section 8	Federal Direct Loan Program	
Section 9	TEACH Grant Program	
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	
Appendix D	COVID 19 2020-2021 Guidance	

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

Break it down

- Sections for each topic
 - Each section broken down further



Contents | Section 1: Manual Introduction | Section 2: Administrative Organization and Office Management | Section 3: Financial Aid Programs

3 COLUMN(S) DISPLAY

RESOURCES	ITEM Show All Item Comments Expand All Items Collapse All Items	DUE DATE	COMPLETE?
	▼ 1.1 INTRODUCTION TO THE FINANCIAL AID OFFICE	0	<input checked="" type="checkbox"/>
	▼ 1.2 PURPOSE AND PHILOSOPHY OF THE FINANCIAL AID OFFICE	0	<input checked="" type="checkbox"/>
	▼ 1.3 POLICIES AND PROCEDURES DEVELOPMENT RESPONSIBILITIES	0	<input checked="" type="checkbox"/>
	▼ 1.3.1 RESPONSIBLE PERSONNEL	0	<input checked="" type="checkbox"/>
	▼ 1.3.2 DOCUMENTS AND METHODS	0	<input checked="" type="checkbox"/>
	▼ 1.4 IMPLICIT BIAS AWARENESS & INDIVIDUAL DEVELOPMENT POLICY	0	<input type="checkbox"/>
	▼ 1.X - RESERVED FOR INSTITUTION USE	0	<input type="checkbox"/>

SAVE NEXT

Example

▲ 3.3.6 SIXTH FEDERAL PROGRAM (E.G., FEDERAL DIRECT STUDENT LOAN PROGRAM)

New item since previous version

The Federal Direct Student Loan (Direct Loan) program encompasses the Direct Subsidized, Direct Unsubsidized, Direct PLUS and Direct Consolidation Loan Programs. Typically, institutions opt to break the Direct PLUS Loan into a separate category as it has different criteria than the Direct Subsidized and Direct Unsubsidized loans. Loan funds for these programs are provided by the federal government to students and parents through postsecondary institutions.

The Direct Loan process is managed by an Assistant Director who reports to the Associate Director of Processing. The Assistant Director uses various tools from PeopleSoft-Campus Solutions and Common Origination and Disbursement (COD) to manage reporting, reconciling missing documents and Reconciling Disbursement and Cash Drawdowns as required by Direct Loan Quality Assurance.

The following are the available resources from PS-Campus Solutions for reporting and reconciling missing documents. These COD reports are used for missing documents (DLoan Entrance Counseling ACK, YY-YY Promissory Note, EXIT Counsel RPT NSLDS Fixed Length). There are PS processes that create To Do Items for Entrance Counseling and Master Promissory Note. These must be completed before a loan will authorize for disbursement:

The screenshot displays the PeopleSoft-Campus Solutions interface. The breadcrumb navigation path is: Favorites > Main Menu > Financial Aid > Loans > Process Loans. The left sidebar shows the FSCJ Florida State College at Jacksonville logo and a 'Loan Origination' section with search criteria and buttons for 'Find an Existing Value' and 'Add a New Value'. The main content area shows a navigation tree with folders for File Management, Institutional Application Data, Federal Application Data, Canadian Application Data, Aid Year Activation, Verification, Financial Aid Term, Budgets, Ability to Benefit, Awards, Disbursement, Loans, Pell Payment, Fund Management, Return to Title IV Funds, Satisfactory Academic Progress, Financial Aid History, Student Loans Company, View Financial Aid Status, and View Parking Status. The 'Loans' folder is expanded, showing sub-folders for Commonline Management, Commonline Reconciliation, and Direct Lending Management. The 'Direct Lending Management' folder is further expanded, showing a list of actions: Manage Direct Loan Application, View Loan Processing Actions, View Promissory Note Actions, Override Loan Application Data, Hold/Suspend, Override Processing Status, and Review Promissory Note Actions. At the bottom of this list are 'SAVE' and 'NEXT' buttons.

Items to add

- Screenshots
- Links
- Forms
- Acronyms and abbreviations (Did the student receive their SAR and the college the ISIR, you can check FAA Access to CPS for that. What is their EFC, SAP, any NSLDS matches, what does COD say their LEU is?)



Availability

- If you use NASFAA's P&P Builder, it is available to all eligible users at your school.
- Save to Network Drive
- Print it out

A few reminders

- Make sure what you say you are doing in writing is what you are doing
- Make sure your website statements match your P&P
- Update your P&P as regulations change, third party changes, and systems change.

Business Partners





Questions?

