NAVIGATING FINANCIAL AID RESOURCES

NICOLE N. MCMILLIN, DIRECTOR OF FINANCIAL AID, CWI
AGENDA

• UNDERSTANDING THE MAP
  • FA WORLD: DRAWING THE MAP AND FILLING IN DETAILS

• WHAT ARE THE RESOURCES?
  • PROS AND CONS OF EACH

• WAY FINDING: WHERE DOES YOUR QUEST TAKE YOU?
  • RIGHT QUESTION, RIGHT RESOURCE, RIGHT SEARCH

• USE YOUR CLUES AND CUES
  • SEARCHING TIPS AND TRICKS

• YOU FOUND THE HIDDEN MICKEY, NOW WHAT?
QUICK OVERVIEW AND HISTORY

HEA OF 1965 AS AMENDED

- **HEA PROGRAMS FALL INTO 4 MAIN CATEGORIES:**
  - Student Financial Aid
  - Services to help students complete high school and enter and succeed in postsecondary education
  - Aid to institutions
  - Aid to improve K-12 teacher training at postsecondary institutions

- **THERE ARE 7 SECTIONS OF THE HEA**
  - One of most significant is Title IV which addresses student assistance specifically.

SOURCE: [HTTP://WWW.NORTHEASTERN.EDU/GOVERNMENTRELATIONS/PUBLIC_POLICY/FINANCIAL_AID_REGULATION.HTML](HTTP://WWW.NORTHEASTERN.EDU/GOVERNMENTRELATIONS/PUBLIC_POLICY/FINANCIAL_AID_REGULATION.HTML)

PICTURED: A PLAQUE THAT CELEBRATES THE SIGNING OF THE HEA IN 1965 AT PRESIDENT LYNDON B. JOHNSON'S ALMA MATTER, SOUTHWEST TEXAS STATE COLLEGE. THE PLAQUE STANDS WHERE THE ACT WAS SIGNED.
UNDERSTANDING FA WORLD
FA REGULATIONS – HOW IS THE MAP DRAWN AND CHANGED?

- The U.S. Department of Education (ED) is responsible for drafting and implementing federal regulations in conjunction with the Higher Education Act (HEA) of 1965.

- The HEA is consistently reviewed and evaluated and reauthorized.
  - Process should happen every five years approximately.
  - Last reauthorization was 2009.
  - Current reauthorization has been on the table since the 2013-15 Congress.
  - This process is how new regulations (also called rules) are established.
    - ED is responsible for publishing, interpreting, and implementing any new regulations (rules).

*NASFAA has compiled the information and bills related to HEA reauthorization: [https://www.nasfaa.org/higher_education_act_reauthorization](https://www.nasfaa.org/higher_education_act_reauthorization)
RULEMAKING: FILLING IN THE MAP’S GAPS

• AFTER REGULATIONS (RULES) ARE PROPOSED – ESTABLISHING NEW OR CHANGED PROPOSED BOUNDARIES ON THE MAP – WHAT HAPPENS NEXT?

• TYPICALLY, ED DEVELOPS ITS PROPOSED REGULATIONS WITHOUT PUBLIC INPUT AND PUBLISHES THEM IN THE FEDERAL REGISTER FOR COMMENT BY THE PUBLIC.
  • NPRM AND PUBLICATION
  • NEGOTIATED RULE MAKING
  • PUBLIC COMMENT PERIOD (ALL COMMENTS HAVE TO BE READ)
  • FINAL RULE AND PUBLICATION
    • FINAL RULES ARE PUBLISHED IN THE FEDERAL REGISTER
    • MUST CONTAIN AN EFFECTIVE DATE
    • CANNOT BE MADE EFFECTIVE IN LESS THAN 30 DAYS AFTER PUBLICATION WITHOUT EXEMPTION

HTTPS://WWW2.ED.GOV/POLICY/HIGHERED/HEA/NEEDS/NEEDS/NEEDS/HEA.08-FAQ.HTML
RULES ARE SET, WHERE TO NEXT?

- Once new regulations are set and implemented, you should...
  - Understand how to use your resources
  - Use resources to gain understanding of the changes or new requirements
  - Review institutional P & P
  - Update documentation
  - Communicate and train
WHAT ARE YOUR RESOURCES?
# FA RESOURCES: WHAT BELONGS WHERE?

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<th>U.S. Department of Education (ED)</th>
<th>IFAP</th>
<th>NASFAA</th>
<th>Other Federal Resources</th>
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<td>• OCR complaint process</td>
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<td>• Training &amp; Events</td>
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<td>• Student Loans</td>
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- **List-servs/Newsletters**:
  - User based
  - Software Based
  - Organizations
  - Associations
  - Finaid-L
  - Higher Ed newsletters

- **Other**:
  - Your P & P Professionals
  - Other Schools
  - Conferences
  - Association Training
  - Guarantor Training
  - Finaid.org
  - Google
## Pros and Cons

<table>
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<tr>
<td>IFAP: Guidance based on the Regulation, From the Horse’s Mouth</td>
<td>IFAP: Varied Search Results</td>
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<td>NASFAA: Includes Links to Handbook and Regulations, Questions from practitioners</td>
<td>NASFAA: Cost of Membership</td>
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<tr>
<td>Other Federal Resources: “Source of Truth”</td>
<td>FSA: Some are consumer rather than practitioner focus</td>
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<td>List-Serv: User POV</td>
<td>List-Serv: User POV, institutional nuance</td>
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<tr>
<td>Other: Varied information</td>
<td>Other: User beware</td>
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WAY FINDING
WAY FINDING
WHERE SHOULD YOU BEGIN AND WHERE MIGHT IT TAKE YOU?

1. DETERMINE THE QUESTION YOU ARE ASKING.

2. WHICH RESOURCE MAKES THE MOST SENSE?

3. TIME IS A VALUABLE RESOURCE!
WHAT IS YOUR QUESTION?

BE AS SPECIFIC AS POSSIBLE

• IS YOUR QUESTION ABOUT...
  • REGULATION
  • GUIDANCE
  • FAFSA QUESTION
  • SCHOOL POLICY OR PRACTICE
  • SYSTEM QUESTION
  • VERIFICATION
  • STUDENT AID RECEIVED
WHICH RESOURCE SHOULD YOU USE?

- **REGULATION**
  - FEDERAL REGISTER – EXACT LANGUAGE FROM PUBLISHED FINAL RULE
  - HANDBOOK – LOOK FOR SPECIFIC TOPIC OR KEY WORDS
  - NASFAA ASK REGS

- **GUIDANCE**
  - HANDBOOK – INTERPRETATION OF WHAT IS IN THE FEDERAL REGISTER
  - DEAR COLLEAGUE LETTERS
  - ELECTRONIC ANNOUNCEMENTS THAT FOLLOW-UP DEAR COLLEAGUE LETTERS
WHICH RESOURCE SHOULD YOU USE?

• FAFSA QUESTION
  • FAFSA PAPER FORM
  • STUDENTAID.GOV
  • APPLICATION AND VERIFICATION GUIDE
• SCHOOL POLICY OR PRACTICE
  • FA DIRECTOR AND/OR MANAGEMENT
  • FA P & P
  • SCHOOL POLICIES
WHICH RESOURCE SHOULD YOU USE?

- SYSTEM QUESTION
  - VENDOR HELP SITES
  - SYSTEM USER GROUPS
  - COLLEAGUE WHO USES THE SAME SYSTEM AT YOUR SCHOOL OR ANOTHER SCHOOL

- VERIFICATION
  - FEDERAL REGISTER (NEED ANALYSIS METHODOLOGY & ACCEPTABLE DOCUMENTATION)
  - APPLICATION AND VERIFICATION GUIDE
  - FA P & P

- STUDENT AID RECEIVED
  - NSLDS
  - COD
REMEMBER: TIME IS A VALUABLE RESOURCE!

ESTABLISH GUIDELINES TO KEEP YOU ON TRACK AND AVOID WASTING TIME

• ESTABLISH MAXIMUM TIME SPENT ON SEARCHING/SEEKING ANSWER
  • ALLOW FOR DIFFERENCES FOR LEVEL/TYPE OF QUESTION BEING ASKED (EASY, MEDIUM, DIFFICULT)
  • ALLOW FOR DIFFERENCES BASED ON THE RESOURCE YOU ARE USING (E.G., SEARCHING A WEBSITE VERSUS MAKING CONTACT WITH SOMEONE)

• ONCE YOU HAVE THE INFORMATION, DETERMINE SCOPE AND SIGNIFICANCE
  • DOES IT JIVE WITH WHAT YOU THOUGHT YOU UNDERSTOOD?
  • DOES IT MAKE SENSE?
  • DO YOU NEED TO SEARCH FOR ADDITIONAL INFORMATION?
  • IS IT OPEN TO INTERPRETATION?
  • DO YOU NEED TO REQUEST CLARIFICATION OR REQUIRE ADDITIONAL UNDERSTANDING OF WHY?
  • DO YOU NEED TO SEARCH FOR MORE STUDENTS IN THE SAME BOAT?
USE YOUR CUES AND CLUES

KEY WORDS AND PHRASES
RECOGNIZING KEY WORDS AND PHRASES

WHEN READING (PARTICULARLY IN THE HANDBOOK) IT IS IMPORTANT TO PAY ATTENTION TO UNIQUE WORDS, PHRASES, AND NUMBERS. THESE ALLOW YOU TO SEARCH WITH MUCH MORE EASE!

THIS WILL ALSO HELP AS YOU TAKE YOUR CREDENTIAL TESTS TO SEARCH THE PARTICIPANT GUIDE QUICKLY.
EXAMPLES OF SEARCHING TIPS AND TRICKS

RESOURCE = IFAP

1. TYPE IN KEY WORDS, PHRASES, OR NUMBERS
2. USUALLY PULLS UP OLDER HANDBOOKS, BUT YOU CAN SEE THE VOLUME AND CHAPTER AND GO TO THE CURRENT ONE TO SEARCH
3. OPEN THE ENTIRE VOLUME UNLESS YOU KNOW SPECIFIC CHAPTER
4. SEARCH KEY WORD, PHRASE, NUMBER IN THE VOLUME OR CHAPTER
Q: YOU KNOW THERE IS SOMETHING RELATED TO VERIFICATION WHERE YOU DON'T HAVE TO MAKE CHANGES IF IT IS BELOW A CERTAIN DOLLAR VALUE.

A: THIS IS A QUESTION RELATED TO VERIFICATION, AVG IS THE RIGHT RESOURCE.

• YOU OPEN AVG FROM THE IFAP SITE.
• YOU REMEMBER THAT THIS CONCEPT USES THE UNIQUE WORD NON-DOLLAR.
• YOU SEARCH FOR NON-DOLLAR.
• YOU GO RIGHT TO YOUR ANSWER!

CORRECTING ERRORS
As explained in the last section, you only make updates in specified situations, but for students who are not selected for verification, you or they must correct and submit for processing any errors reported on the original FAFSA that would change the EFC or that determine the students’ eligibility for aid.

For students who are selected for verification and receiving subsidized student aid, changes that result to any non-dollar item and to any dollar item of $25 or more must be submitted for processing. See the section on changes to a selected applicant’s FAFSA.
Q: YOU HAVE REACHED THE END OF THE SEMESTER AND HAVE A STUDENT THAT DIDN’T RECEIVE A DIRECT LOAN DISBURSEMENT, BUT COMPLETED THE SEMESTER AND ISN’T ENROLLED IN THE NEXT SEMESTER. THE LOAN WAS ORIGINATED AND YOU THINK THEY MIGHT BE ELIGIBLE TO RECEIVE A DISBURSEMENT.

A: FOR A DISBURSEMENT QUESTION, THE HANDBOOK IS THE RIGHT RESOURCE.

- YOU GO TO THE SEARCH BOX FOR HANDBOOK SEARCH.
- YOU TYPE IN “LATE DISBURSEMENT” AND CHANGE RADIO BUTTON TO “ALL”.
- YOU SEE LOTS OF REFERENCES IN OLD HANDBOOKS, BUT ALSO SEE THIS PHRASE IS IN VOLUME 4, CHAPTER 2.
- YOU GO TO CURRENT YEAR HANDBOOK AND SELECT VOLUME 4, CHAPTER 2, DISBURSING FSA FUNDS.
- HIT CTRL F AND SEARCH: LATE DISBURSEMENT.
- READ THROUGH ELIGIBILITY REQUIREMENTS AND DETERMINE IF THEY ARE ELIGIBLE FOR THE LOAN.
HIDDEN MICKEY’S

YOU FOUND THE INFORMATION NOW WHAT?

LAYER YOUR RESOURCES AND RESULTS.

CHECK YOUR INTERPRETATION.

WHAT DOES IT MEAN IN PRACTICE/PROCEDURE?

WHERE TO NEXT?
WHAT DOES IT MEAN TO LAYER RESOURCES/RESULTS?

- **REMEMBER HOW WE STARTED THIS TOPIC...UNDERSTANDING THE MAP**
  - Recognition that many of the areas of regulation overlap and/or determine next steps or the next part of regulation to search for is key.
- **RARELY IS A CONCEPT INSULAR OR MEANT TO BE UNDERSTOOD AS A STAND ALONE TOPIC**
  - Tomorrowland may start to blur into Fantasyland
  - In fact, this would look like understanding how verification and conflicting information overlap and co-exist:
    - When reviewing guidance on verification and conflicting information, one does not trump the other, nor can the specifics of either be ignored when dealing with one or the other. If both are present, both must be addressed under the guidance unique to each.
CHECK MATE!

- Because many of our resources are interpretations of federal regulations which are written in ways that leave them open to different interpretations/understanding, it is important to check your understanding.

- How do you do that?
  - Cross reference resources
  - Consult subject matter experts
  - Check with others in your office or at other schools (remember some parts leave decision points to the institution so they could vary and there is also spelled out may versus must which can also cause variance)
  - Check with your director or management
DOES THIS CHANGE PRACTICE OR PROCEDURE?

• HAS THE REGULATION CHANGED OR THERE IS NEW GUIDANCE THAT WOULD REQUIRE A CHANGE IN PRACTICE OR PROCEDURE?

• DOES THE INFORMATION YOU HAVE SEEM TO CONTRADICT A CURRENT INSTITUTIONAL PRACTICE OR PROCEDURE?

• CHANGES MAY REQUIRE TIME TO IMPLEMENT.
  • THINK THROUGH ALL THE RAMIFICATIONS AND CHANGES NEEDED
  • UPDATES TO SYSTEM
  • UPDATES TO COMMUNICATIONS OR FORMS

• THE FA OFFICE SHOULD KEEP THEIR P & P UP-TO-DATE AND TRACK THE UPDATES SO YOU KNOW HOW LONG AGO ANY PARTICULAR PART OF IT WAS LAST REVIEWED.
WHERE TO NEXT?

• CONTINUE TO BUILD YOUR KNOWLEDGE AND REMEMBER THAT ROME WASN’T BUILT IN A DAY!
  • YEARS 1-3 IN FA
    • START TO FIGURE OUT THE DAY TO DAY AND AS YEARS PASS THE CYCLE OF THE ACADEMIC YEAR
    • GOOD TIME TO SOAK IN INFORMATION AND START TO UNDERSTAND UP FROM DOWN RELATED TO FEDERAL REGULATIONS
  • YEARS 4-6 IN FA
    • FIGURING OUT AND UNDERSTANDING MORE AND MORE ABOUT FEDERAL REGULATIONS AND STARTING TO CONNECT CONCEPTS
    • GOOD TIME TO START TO QUESTION AND UNDERSTAND THE WHY BEHIND PRACTICE, SYSTEM SET-UP, ETC.
  • YEAR 7+
    • YOU FOUND YOUR CALLING AND CAREER! CONTINUE TO HELP STUDENTS REACH THEIR DREAMS AND FIND THEIRS!
Q & A
THANK YOU!

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