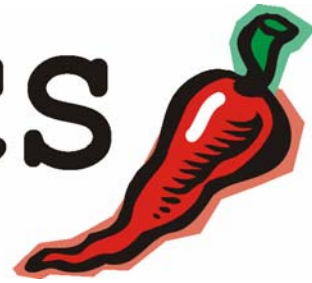


# hot TOPICS



IPD Financial Aid News  
Volume 5, Issue 3

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## 2003 CAAHE Conference

Not even a ferocious summer thunderstorm could dampen the high intellectual spirits of 140 CAAHE Conference participants this past June in Atlanta, GA. Graciously hosted by Shorter College, this year's conference theme, "Leading Through Change," was evident throughout the 12 distinct workshops and keynote speakers. In fact, a last-minute cancellation by the opening keynote speaker resulted in a wonderful, highly relevant presentation by CAAHE's Chair, Dr. Jan Jones, Shorter College's Dean of the School of Professional Programs.



Feedback from attendees pinpointed the presentation by this year's Paul E. Hoffner Outstanding Faculty Award recipient, Dan Crowe of Shorter College, as another conference highlight. Mr. Crowe's presentation, "Faculty and Study Teams: Who's Leading Whom?," was so informative and engaging that he was asked for an encore, which he humbly provided.

The annual conference provides the perfect venue for CAAHE to accomplish its primary purpose—to promote and facilitate the sharing of best practices, information, techniques, practices, and resources among member institutions.

The membership extends a huge thank you to Shorter College for hosting such a fun, informative conference. In addition, many thanks to the conference planning committee members for their many hours of careful planning:

A copy of the full agenda can be accessed at [www.caahe.org](http://www.caahe.org).

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## Life Experience Credits:



As communicated earlier, there is some new language in the 2003–2004 Federal Student Aid (FSA) Handbook that we are seeking additional guidance on from the Department of Education (ED). It states in Volume 2, Chapter 3 page 8–23 that “Credits awarded for ‘Life Experience’ do not affect the grade level—only academic credits earned for coursework.” Good news! While at the NASFAA Conference last week, we were able to speak with Jeff Baker, ED. He was asked if he could clarify what the handbook states in regards to our two statements of concern. (Transfer students must have an associate degree in order to receive third-year loan limits, and credits awarded for “life experience” don’t affect the grade level.) He was shown a copy of the handbook, and once he read through it—he said it was incorrect. He took the copy and told us to continue doing as we have in the past. Nothing has changed. He indicated there will be clarification sent out in the near future regarding those statements.

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## Dependency Overrides

The Higher Education Act of 1965, as amended (HEA), defines an independent student as someone who fits into one or more of the following categories:

- 1) Is 24 years of age or older by December 31 of the award year;
- 2) Is an orphan or ward of the court or was a ward of the court until the individual reached the age of 18;
- 3) Is a veteran of the Armed Forces of the United States;
- 4) Is a graduate or professional student;
- 5) Is a married individual; or
- 6) Has legal dependents other than a spouse.

If a student does not fit into one or more of the above categories, the student is considered dependent, and his/her parent’s information must be provided on the Free Application for Student Aid (FAFSA). However, for those students in unusual circumstances, the Higher Education Act allows financial aid administrators to make dependency overrides on a case-by-case basis. An example of an unusual circumstance could include conditions such as an abusive family environment or abandonment by parents. However, it is important to note that none of the conditions listed below, individually or in combination with one another, qualify as unusual circumstances and do not merit a dependency override:

- 1) Parents refuse to contribute to the student’s education;
- 2) Parents are unwilling to provide information on the application or for verification;
- 3) Parents do not claim the student as a dependent for income tax purposes;
- 4) Student demonstrates total self-sufficiency.

## Dependency Overrides, continued

A financial aid administrator may override only from a dependent student to an independent student, not vice versa. Furthermore, it is important to note that the law requires a determination of unusual circumstances be made each award year. Even though a determination of independence was made one award year, it does not automatically make the same student independent for a subsequent award year. In addition, a dependency override at one institution is not binding at another institution. The law requires that the financial aid administrator at the school the student is currently attending make the determination and have sufficient documentation to support its decision.

When collecting information for a dependency override, third-party written documentation is usually required to support a student's unusual circumstances. However, in limited cases where the only available statement is from the student, the statement must include facts related to the student's unusual circumstances. It is the school's responsibility to include, in writing, all other relevant facts relating to the dependency override.

Once all documentation pertaining to the student's unusual circumstance is reviewed, the financial aid administrator must make a determination. If it is determined that a dependency override is warranted, the financial aid administrator must write a statement of that determination. The statement must include the identification of the specific unusual circumstance upon which the financial aid administrator based his/her determination. The institution must maintain this documentation along with any supporting documentation used to make each individual determination. Dear Partner (Colleague) Letter GEN-03-07 is posted to the federal Web site at <http://ifap.ed.gov/dpclatters/GEN0307.html>.



### CB-03-10: Fiscal Operations Report and Application to Participate (FISAP)

The National Association of Student Financial Aid Administrators (NASFAA) Web site <http://www.NASFAA.org/publications/2003/cb0310.html> provides information about the Fiscal Operations Report for 2002-2003 and Application to Participate for 2004-2005 (FISAP). It includes a series of questions and answers relating to the FISAP for 2004-2005 and also features links to the FISAP Instructions Booklet, FISAP Form, and FISAP Reference to the CB-03-10 letter to aid in preparation of the FISAP for 2004-2005.



### Tens Of Thousands Will Lose College Aid, Report Says (*The New York Times*)

"The first report to document the impact of the government's new formula for financial aid has found that it will reduce the nation's largest grant program by \$270 million and bar 84,000 college students from receiving any award at all," *The New York Times* reports. To read the article, see the NASFAA Web site at <http://www.NASFAA.org/publications/2003/awaidformula071803.html>.



## Consumer Information Requirement Revisited

In order for an institution to participate in any Title IV, HEA programs other than Leveraging Educational Assistance Partnership (LEAP) and National Early Intervention Scholarship and Partnership (NEISP), the regulations require that institution to sign a Program Participation Agreement (34 CFR 668 §14) in which the institution agrees to comply with all the program regulations. Some of the regulations pertain to the dissemination of information to currently enrolled and prospective students, and to current and prospective employees. These provisions are commonly referred to as the “consumer information” requirements or “consumerism.” This article provides a broad overview of the consumerism requirements, as opposed to addressing the requirements individually. For more details, please access Code of Federal Regulations: Title 34, Part 668 at [http://www.access.gpo.gov/nara/cfr/waisidx\\_02/34cfr668\\_02.html](http://www.access.gpo.gov/nara/cfr/waisidx_02/34cfr668_02.html).

### Reporting and Disclosure of Information

The disclosure of information (34 CFR 668 §41) may be through a variety of means. The regulations provide that “Notice” is the notification required to an individual on a one-to-one basis through an appropriate mailing or publication, including direct mailing through the U.S. Postal Service, campus mail, or electronic mail. Posting on an Internet Web site or an Intranet Web site does not constitute notice. Some information, however, may be disclosed through Internet or Intranet Web sites that are reasonably accessible to those individuals for whom the information is intended. Types of information to be disclosed include:

- ◆ Rights under the Family Education Rights and Privacy Act (FERPA);
- ◆ Notice to enrolled students—briefly describes notification information and how to obtain it;
- ◆ General information to enrolled and prospective students regarding financial assistance available, the institution itself, and the institution’s completion or graduation rate;
- ◆ Completion/Graduation rate and, if applicable, transfer-out rate;
- ◆ Annual security report; or
- ◆ Student-athlete information, including the completion and graduation rates for student-athletes athletic program participation rates, and financial support data.



### Family Education Rights and Privacy Act (FERPA) §99.7

The full report must be disclosed to students/parents upon request, and it must include the following:

- ◆ Right to review the student’s educational records;
- ◆ Procedures for inspecting the student’s educational records;
- ◆ Right to request an amendment of the student’s education records;
- ◆ Procedures to request an amendment to their records;
- ◆ Right to consent to disclosure of personally identifiable information contained in student’s education records;
- ◆ Right to file a complaint with ED for alleged school or educational agency’s failure to comply with FERPA requirements; and
- ◆ Right to review the school’s definition of a school official and/or a legitimate educational interest, if the school’s policy is to disclose personally identifiable information from the student’s education records without prior consent.



The Family Educational Rights and Privacy Act (FERPA) (20 U.S.C. § 1232g; 34 CFR Part 99) can be found at <http://www.ed.gov/offices/Oll/fpco/ferpa/index.html>.

## Consumer Information Requirement Revisited, continued

### Financial Assistance



Institutions are required to publish and make readily available to all current and prospective students, the description of financial assistance programs available to enrolled students (34 CFR 668 §42):

- ◆ Procedures and forms used to apply for assistance, student eligibility requirements, criteria for selecting recipients, and criteria for determining award amounts for recipients;
- ◆ Rights and responsibilities of students receiving financial assistance including criteria for continuing student eligibility, criteria for reestablishing eligibility, method and frequency of financial aid disbursements, terms of loans including sample loan repayment, terms of employment, and entrance and exit counseling;
- ◆ If the school participates in Title IV Campus Based Aid Programs, information on prevention of drug and alcohol abuse;
- ◆ Information on funds for study abroad and study abroad programs; and
- ◆ Terms and conditions on deferments for service under the Domestic Volunteer Service Act, service in the Peace Corps, and comparable volunteer service for tax-exempt organization of demonstrated effectiveness in the community service field.

### Institutional Information



Institutions must make readily available, upon request to enrolled and prospective students, information regarding attending the institution. This may include (34 CFR 668 §44):

- ◆ Costs of tuition and fees, books and supplies, room and board, transportation costs;
- ◆ Refund policies;
- ◆ Withdrawal procedures and subsequent return of grants and/or funds;
- ◆ Institution's degrees, training programs, or other educational offerings;
- ◆ Academic programs with details of instructional, laboratory, and other physical facilities;
- ◆ Availability of the GED Program for schools that admit students without high school diplomas;
- ◆ Accrediting and licensing associations and agencies;
- ◆ Facilities and services available to disabled students;
- ◆ A list of faculty and instructional staff;
- ◆ Satisfactory Progress;
- ◆ Campus Security Report; or
- ◆ Title and availability of employees responsible for dissemination of institutional and financial assistance disclosure information and how to contact them.

### Completion/Graduation Rates and Transfer-Out Rates

The full report must include the following (34 CFR 668 §45):

- ◆ Completion/graduation rates of cohort of full-time undergraduates who graduated/completed their program within 150% of the normal time for graduation/completion; and
- ◆ Completion/graduation rates (if applicable, transfer-out rates) of students receiving athletically related student aid.



## Consumer Information Requirement Revisited, continued

### Security Policies and Crime Statistics

The ownership and use of buildings and properties of and around the campus are factors used to determine the responsibility for security and reporting thereon. The institution must prepare an annual security report for all areas deemed to be within its realm of responsibility and/or control. This report must contain the following (34 CFR 668 §46):



- ◆ Crime statistics;
- ◆ Statement of current policies for reporting campus crime and emergencies;
- ◆ Statement of current policies concerning security of and access to campus facilities;
- ◆ Statement of current policies addressing the enforcement authority of campus personnel, the timely reporting of crimes, and procedures for counseling victims who report their crimes;
- ◆ Description of programs about prevention of crimes;
- ◆ Statement of current policies regarding the use of alcohol and drugs and description of drug and alcohol abuse programs; and
- ◆ Statement of current policies regarding campus sexual assault programs promoting awareness, procedures for victims to notify authorities, and availability of counseling.

The annual report must also contain:

- ◆ Crime statistics for the three most recent calendar years on criminal homicide; sex offenses, robbery, aggravated assault,; burglary, motor vehicle theft, arson, and arrests for liquor, drug, and illegal weapons possession.
- ◆ Crime statistics categorized by calendar year and by location, by determination of hate crime, and without the identification of the victim or the accused.

In addition, the institution must:

- ◆ Issue annual reports for each separate campus;
- ◆ Issue timely warnings to the campus community; and
- ◆ Maintain an up-to-date, detailed crime log open to public inspection.



### Athletic Programs

The requirements for reporting of athletic programs apply to any coeducational institution that participates in any Title IV, HEA program and has an intercollegiate athletic program. The institution must report annually on the completion and graduation rates of student athletes, the athletic program participation rates, and the financial support data.

The completion and graduation rates of student-athletes must be categorized by race, gender, and within each sport, and must contain the following (34 CFR 668 §47):

- ◆ Number of students attending the institution and those attending who received athletically related student aid;
- ◆ Completion or graduation rate of entering undergraduate students and the rates of those who received athletically related student aid ; and
- ◆ Average completion or graduation rate for the four most recent completing or graduating classes and the average rates of those who received athletically related student aid.

The institution must prepare annually a report containing (34 CFR 668 §48):

- ◆ Number of male and female full-time undergraduate students attending the university;
- ◆ Listing of varsity teams in intercollegiate competition detailing the number of team members, total operating expenses, and the number and gender of the head and assistant coaches and whether they were full-time or part-time; and
- ◆ Unduplicated head count of participants on varsity teams by gender.

## Consumer Information Requirement Revisited, continued



Financial support must be reported according to the following categories (34 CFR 668 §47):

- ◆ Total revenues attributable to intercollegiate athletic activities;
- ◆ Total revenues attributable to all men's sports combined and all women's sports combined;
- ◆ Revenues attributable to each sport, keeping separate football, men's basketball, women's basketball, men's combined other sports, and women's combined other sports;
- ◆ Expenses incurred by the institution in the above categories;
- ◆ Total money spent on athletically related student aid, aggregately for men's teams and aggregately for women's teams, as well as the ratio of awarded aid for men and for women;
- ◆ Total amount of recruiting expenses, aggregately for men's teams and aggregately for women's teams; and
- ◆ Salaries of coaches and assistant coaches of men's teams and of women's teams.

Revenues not attributable to a particular sport (non-targeted alumni contributions, investment income, student activity fees, etc.) must be included only in the total revenues, combining men's and women's sports if appropriate.

While this article highlights some of the major consumerism requirements, it does not address each consumerism requirement individually. Therefore, institutions are encouraged to review relevant regulatory authority to ensure compliance with all consumerism requirements.

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## IPD Financial Aid Training

IPD is pleased to announce financial aid training for directors/adult program processors. This offer is extended to new client institutions and existing partner institutions with employees new to the financial aid position. The training will be basic financial aid training for nontraditional programs utilizing non-term methodology. Topics to be discussed include:

- ◆ Application Process
- ◆ Satisfactory Academic Progress
- ◆ Scheduling
- ◆ Cash Management
- ◆ Loan Processing
- ◆ Return of Funds
- ◆ Pell Processing
- ◆ Regulatory Update
- ◆ Verification

The training is scheduled to be held in Phoenix, Arizona on October 6–7, 2003. Participants should plan to arrive in Phoenix on Sunday, October 5th.

Please e-mail Kristen Vedder [kristen.vedder@apollogrp.edu](mailto:kristen.vedder@apollogrp.edu), by August 20, if you are interested in participating or sending a staff member. Please include all contact information (name, title, mailing address, phone number, and e-mail address) for the participant in the e-mail. See you in Phoenix!

## Other Financial Aid Opportunities

NAME OF ASSOCIATION	TENTATIVE DATES for WORKSHOP/CONFERENCE	LOCATION
<b>DEPT. OF ED</b>		
Title IV Cash Management Training	September 10–December 12, 2003	Multiple locations
Electronic Access Conferences	November 2–5, 2003 December 2–5, 2003	San Diego, CA New Orleans, LA
<b>MASFAA</b>		
Annual Conference	October 12–15, 2003	Milwaukee, WI
<b>SWASFAA</b>		
Annual Conference	November 19–21, 2003	Little Rock, AR
<b>CASFAA</b>		
Association Meeting	December 13–15, 2003	Monterey, CA

Title IV Cash Management Training <http://ifap.ed.gov/dpcletters/ann0307.html>  
 Electronic Access Conferences <http://edeworkshop.ncspearson.com/SanDiego.htm>  
 MASFAA/SWASFAA Annual Conferences and CASFAA Association Meeting  
<http://www.nasfaa.org/EventsCalendar2003.asp>

## Financial Aid Global Distribution List



The Financial Aid Global Distribution List (including only CAAHE members) is available to allow you to consult with one another about the common problems you face and solutions you have found that have provided positive results. To use the list, open a regular e-mail and type [ipdfinaid@apollogrp.edu](mailto:ipdfinaid@apollogrp.edu) in the “To” section of the message. When the e-mail is sent, it will go to all the members of the list. Clicking “Reply To All” in response to the e-mail will send the response to all members of the list. Thanks to all who have been using this list, and to those providing timely responses to requests.

## Goings On

Congratulations to Linda Hayes at Thomas More! She was recently promoted to Director of Financial Aid for the college.

Do you have information about job openings or upcoming events at your institution that you would like to share with the other IPD Partner Institutions? Just e-mail the information (including the name of the event or job opening; any relevant dates; and a name, telephone number, or e-mail address of a contact person) by September 15, 2002, to Kristen Vedder at [kristen.vedder@apollogrp.edu](mailto:kristen.vedder@apollogrp.edu) so that your information will be included in the next newsletter.

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