

Compliance Chats Podcast

Podcast Title:	TITLE IV COMPLIANCE – WHAT IT MEANS & HOW WE FIT IN?	Podcast Date:	
Host:	Omar Andujar	Guest Speaker(s):	Carrie Fernandes, Erin Mason, Stephanie Rimoczy
Purpose	In this interview with Carrie Fernandes, Erin Mason, and Stephanie Rimoczy, listeners will learn about Title IV compliance requirements at UConn, as well as related guidance and resources.		
About Guest Speaker(s)	Carrie Fernandes joined the Office of Student Financial Aid Services in 2015 and is responsible for compliance and quality assurance. She holds a BS degree in Environmental Science from the University of Connecticut and is currently pursuing a MS in Organizational Management from Eastern CT State University. Erin Mason joined the Registrar’s Office in 2010 and is responsible for records and enrollment services, scheduling, and federal compliance. She holds a BA degree in Communications from University of Hartford, and a MA degree in Adult Learning from the University of Connecticut. Stephanie Rimoczy joined the Bursar’s Office from Accounting in 2016 and is responsible for compliance management and federal programs reconciliation. She holds a BA degree in Math from the University of Rhode Island and an MBA/Accounting degree from Bryant University. She also is a certified public account.		

SUMMARIZED PODCAST

HOST: Hello everyone and welcome to today’s podcast. My name is Omar Andujar and you are listening to Compliance Chats a podcast series intended to keep Faculty and Staff up-to-date on various compliance matters.

Today we are talking a little bit about Title IV compliance, what it means, and how we fit into the picture. To help us unpack this topic, I’m joined by subject matter experts from 3 distinct university departments. We have Carrie Fernandes from the Office of Student Financial Aid Services, Erin Mason from the Registrar’s Office, and Stephanie Rimoczy from the Bursar’s Office.

INTERVIEW QUESTIONS:

Question 1 – Can you please tell us a bit more about what Title IV is?

GUEST – STEPHANIE: We commonly refer to Title IV as the federal programs UConn participates in to provide student financial assistance awarded by the Office of Student Financial Aid Services, like the Pell Grant and Work-Study. For example in 2016-2017, UConn disbursed \$194.4M in these programs alone to provide financial assistance to students. Per Federal Student Aid, an Office of the US Department of Education, over \$62 trillion was disbursed by public institutions in 2016-2017, and \$119 trillion for all institutions, so we are talking major federal programs.

Question 2 – Can you speak to what Title IV has to do with compliance and why is it so important?

GUEST - CARRIE: A lot of regulations and sub-regulatory guidance, like the Federal Student Aid Handbook, which is over 1,400 pages, have far-reaching impacts. For instance, the Annual Security and Fire Safety Report published by UConn Public Safety is a federal mandate for Title IV participating institutions. Title IV regulations also impact how we offer and monitor distance education, as it relates to being authorized in each state that we enroll a student

from. While the regulations are large in scope, there are also fundamental concepts surrounding Title IV regulations that can easily be impacted by something as simple as the beginning and ending dates of classes or failing to post grades for a student.

For example, if classes run outside of the University's defined semester, it would change what we in financial aid call a 'term-based' calendar to non-term which changes how we award and when students could receive their financial aid. That's just one of the many examples of why it is so important to think about potential (unintended) impacts when beginning new initiatives, programs, or other type of academic program changes.

The other compliance part of Title IV is that because we award financial aid, we have to go through a financial and compliance audit. UConn meets this requirement by going through the Single Audit annually.

There can be potentially devastating consequences for failing to prove administrative capability such as putting the University on a probationary status, or even revoking its ability to offer federal aid. Given the high volume of aid UConn processes, being unable to offer financial aid to our students would drastically impact their ability to pay for a college education.

Question 3 - Who is responsible for compliance at the University?

GUEST: ERIN - The short answer – all of us at the University are responsible for Title IV compliance.

The long answer is that compliance is tightly woven with the curricular, academic, and administrative activities of the University.

The whole point of Title IV compliance is to ensure fairness and that students across the US get access to academically sound programs. That's why there are rules like definition of a credit hour and the amount of weeks in the semester. We've seen issues occur because well-intentioned people create new academic programs that inadvertently impact students adversely. This can have serious consequences. It can result in the loss of financial aid or the misrepresentation of enrollment status to the Federal government and it can also result in audit findings.

That's why, when you are thinking about creating a new or entrepreneurial program, which we see very often at the graduate level, it can be important to seek consultation with our offices. We've seen great success when departments have looped our offices into the program creation process from the beginning. We worked extensively with various groups-- UConn Law, School of Business, and others to design programs that meet the needs of students and faculty and are federally-compliant.

Question 4 – How are each one of your offices specifically involved with compliance?

GUEST: Carrie – For Financial Aid, we manage the financial aid cluster of the Single Wide Audit, and are responsible for being administratively capable for the Title IV programs at the University. Being administratively capable means a variety of things such as having appropriate number of staffing to manage the Title IV programs, adequate checks and balances for internal controls, substantive documented policies and procedures, providing adequate financial aid counseling, reviewing and reporting suspected financial aid fraud, and determining student eligibility in a consistent manner as it relates to awarding, disbursements, enrollment status, Satisfactory Academic Progress standards, and student status changes. The phrase 'administratively capable' is really a catch-all for everything financial aid does.

GUEST: Steph – Within the last two years, the Bursar's Office has created a new unit with a dedicated focus on Title IV compliance, to assist with various compliance audits and adhere to federal, state, and University regulations. The Bursar's Office is responsible for identifying Title IV recipients who separate from the University and have not earned all of their financial aid in which the student had received for the given semester. Something called a Return to Title IV funds calculation is required to determine what percentage of aid must be returned to

the Department of Education (DOE). This is a really complex calculation with tight deadlines, so it is very important to have accurate student records while establishing consistency and quality in the administration of programs and University policies, including the manner in which financial aid literacy is communicated to students and the collaboration between departments and administrative offices. At times, the Registrar's Office, Dean of Students, Financial Aid, the Bursars Office, and sometimes other departments are involved in this calculation to ensure that we are separating students in accordance with federal regulations.

GUEST: Erin- There are two major ways in which the Registrar's Office is responsible for compliance. The first is through the accurate reporting of enrollment data to the National Student Loan Data System, which impacts when students go into deferment or repayment. The second is the services we provide to the University (in collaboration with the Bursar and Financial Aid Offices) when we consult in the program development or review process of academic programs to ensure they are in compliance with federal and state guidelines.

HOST: Question 5 - Where can listeners learn more about compliance and your offices?

GUEST - ERIN: You can reach out to any one of our offices to begin the conversation and we involve the appropriate campus partners. As we have mentioned in the conversation, we really want to stress that there is a direct connection between compliance and curriculum development. Even if you don't have one student in your program that receives financial aid, we are all still required to act in accordance with the federal regulations.

If you reach out to us about the current curriculum or your proposed curriculum, the process includes a few meetings, but it doesn't have to be scary! This includes brainstorming sessions, throwing out creative ideas, and seeing how we can make things work while also remaining federally compliant. Sometimes the process requires compromises, or it includes reaching out to other schools for best practices, and sometimes even the Department of Education. By working together with faculty and program administrators, we can avoid the confusion for faculty and students and reduce or omit risks. We have a demonstrated track record of working in this capacity and would love for others to reach out to us when reviewing current or developing new curricular programming or with any questions you have about Title IV.

RESOURCES MENTIONED BY SPEAKERS:

<https://bursar.uconn.edu/>

<https://financialaid.uconn.edu/>

<https://registrar.uconn.edu/>

MUSIC CREDITS:

On the Ground. Kevin MacLeod. Royalty Free 2014. Retrieved from: <http://incompetech.com/music/royalty-free/index.html?genre=Jazz>

Rollin at 5. Kevin MacLeod. Royalty Free 2014. Retrieved from: <http://incompetech.com/music/royalty-free/index.html?genre=Jazz>