



This Webinar's Purpose

A walk through on common audit enrollment reporting compliance pain points including example scenarios of issues identified during financial aid audits and program reviews

- Depth of Content: High Level
- Objective: Review common enrollment reporting audit findings and best practices to avoid data discrepancies and untimely reporting
- Other Available Webinar Sessions:
 Webinar Calendar | Clearinghouse Academy (studentclearinghouse.org)
 - Enrollment Reporting Series
 - Error Resolution on the Web
- For additional school specific support, please contact us directly auditresource@studentclearinghouse.org





Agenda

✓ Common Federal Financial Aid Audit Findings overall

✓ Common Enrollment Reporting Audit Findings

✓ Mitigating Enrollment Reporting Compliance Risk

✓ Resources





Common Federal Financial Aid Audit Findings

Most common findings schools experience <u>overall</u> during an Audit or Program Review





Common Federal Financial Aid Audit Findings Overall

- R2T4
- Student Credit Balance Deficiencies
- Verification Violations
- Entrance/Exit Counseling Deficiencies
- Enrollment Reporting

Common **Enrollment Reporting** Federal Financial Aid Audit Findings

- ✓ Graduated (G) Enrollment Status
- ✓ Withdrawn (W) Enrollment Status (Unofficial/Retroactive)
- ✓ School Policy and Procedure Gaps
- ✓ Incorrect Data

Graduated (G) Enrollment Status Reporting





What is the Federal Guidance requirement for Graduated Enrollment Status Reporting?

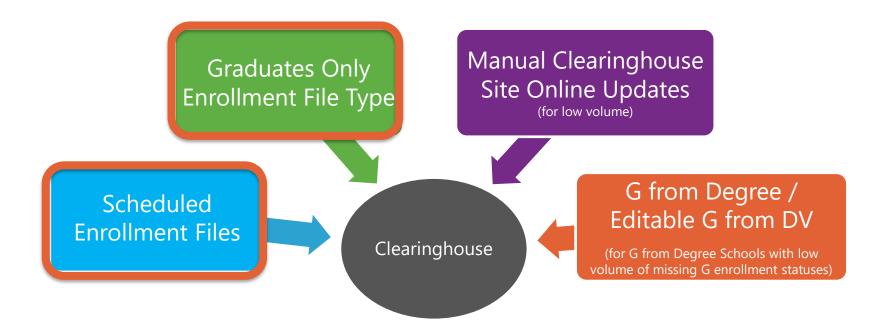
Certify Graduated (G) enrollment statuses for <u>completed programs</u> at the Program Level in Enrollment Reporting to Clearinghouse:

- ✓ Regardless of whether student is currently in-school when the degree is assessed
- ✓ Even if student completes a program later than their last term of enrollment
- ✓ Campus Level Graduated (G) enrollment status is required for students who are separated from the school entirely and completed all current programs in their most recent term of enrollment

How to Avoid Graduated (G) Enrollment Status Audit Findings:

Graduated (G) Enrollment Status Reporting

Leverage Clearinghouse Enrollment Reporting to certify Graduated (G) enrollment statuses in the event the student completed a program at your school



Withdrawn (W) Enrollment Status

Unofficial/Retroactive Withdrawals





Considerations for Unofficial/Retroactive Withdrawals (W) enrollment statuses

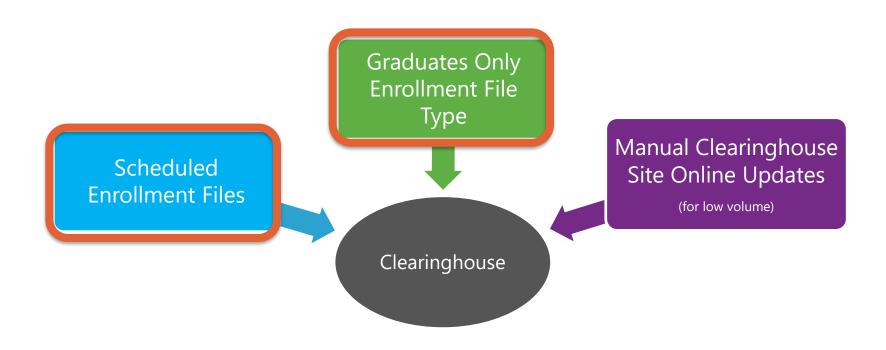
- Unofficial Withdrawal (W) reporting is typically reserved for schools not required to take attendance
- Retroactive Withdrawal (W) reporting can depend on school policy and school approval for a retroactive Withdrawal
- Nature of a status change to Withdrawn (W) can vary, introducing challenges certifying status change to Withdrawn (W) in Enrollment Reporting
- Certain Withdrawn (W) statuses assessed by the school can occur after the student re-enrolled and was reported in an active enrollment status in a later term

Unofficial/Retroactive Withdrawn 'W' Status Reporting How to Avoid Withdrawn 'W' Status Audit Findings:

- Consult School Policy and review/create Best Practices
 - Is there agreement within the school for when a student is considered Withdrawn 'W' versus continuously enrolled?
 - If a Retroactive Withdrawal 'W' is granted, how does Financial Aid address that for Title IV students?
 - <u>2022-2023 FSA Handbook Volume 5 (ed.gov)</u> includes the latest information, effective July 1st, 2021 RE: Withdrawal Exemptions
- If your school commonly assesses Withdrawn students from last term <u>after</u>
 the next term has been reported, please contact Clearinghouse if there are
 questions. We can review the scenario to support your compliance needs,
 <u>auditresource@studentclearinghouse.org</u>

Unofficial/Retroactive Withdrawn (W) Status Reporting How to Avoid Withdrawn (W) Status Audit Findings:

Leverage Enrollment Reporting to certify Withdrawn (W) enrollment statuses in the event the student is Withdrawn from the school



Mitigating Enrollment Reporting Compliance Risk





Critical Role of School Policy and Procedures

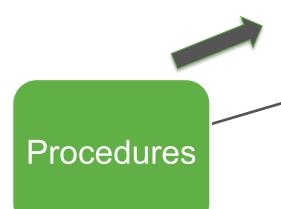












Consistent, Enrollment Reporting for Title IV Compliance

Executing timely accurate reporting

Federal Enrollment Reporting Requirements

NSLDS Rosters must be completed at least every **2** months

NSLDS Rosters returned to NSLDS within 15 days of receipt

Clearinghouse manages NSLDS Roster schedule and responding timely to Rosters

Correct NSLDS Errors within 10 days of receipt

Report enrollment status changes swiftly to Clearinghouse to meet NSLDS' **60**-day timeliness

Schools' NSLDS Enrollment Reporting Statistics Score must be ≥ **90**% (Program certifications & Programs reflecting CIP Year 2020)

Clearinghouse emails alert to school users and posts errors on secure site

School users manage Clearinghouse Enrollment Reporting Schedule via the secure site

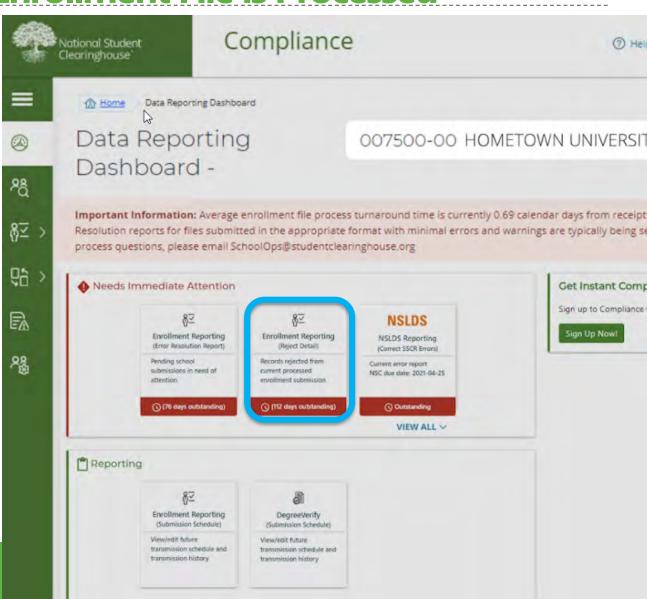
Clearinghouse Enrollment Reporting model and error/warning logic supports consistent, complete data reporting for NSLDS compliance



Correct Clearinghouse Enrollment File Reject Detail After Enrollment File is Processed

✓ Clearinghouse places enrollment records requiring attention on our secure site for school action

Access the report by navigating to <u>studentclearinghouse.org</u> user login link > <u>Student Reporting</u> tab > <u>Data Reporting Dashboard</u> > <u>Enrollment Reporting (Reject Detail) tile</u>

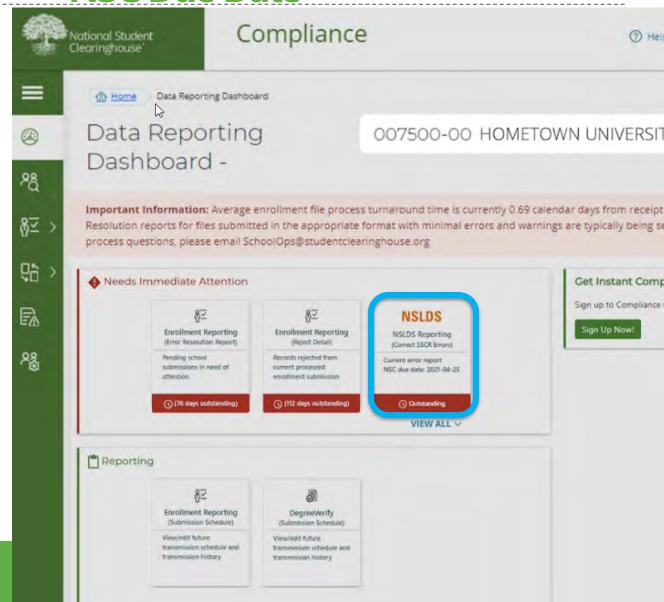




Correct Current NSLDS SSCR Errors by NSC Due Date

✓ Clearinghouse presents
 NSLDS errors on the
 secure site

Access the report by navigating to studentclearinghouse.org user login link > Student Reporting tab > Data Reporting Dashboard link > NSLDS Reporting (Correct SSCR Errors) tile





Incorrect Data





Incorrect Data

The Clearinghouse Enrollment Reporting Process has built in, **compliance-driven logic** to avoid reporting discrepancies <u>wherever possible</u>.

Beyond Enrollment Reporting logic, data errors can still occur

Data inconsistencies

Example: Mismatch between Campus Level Status Start Date (SSD) and Program Level Program Status Effective Date (PSED)

Clearinghouse Enrollment Reporting Error Resolution Report **Warning Code 1800 series**

SIS Programming Issues (can be large scale)

Example: Students with Full-Time course load inadvertently reported as Three-Quarter Time

Clerical Data Entry Issues (typically small scale)

Example: School user submits Online Update for a student with status start date typo reporting Withdrawn effective 05/15 when school determined effective date is 05/05



How to Avoid Audit Findings: Incorrect Data

Clearinghouse Recommendation

Conduct a regular review of your federal aid Title IV students' enrollment reporting

Audit these areas for your student sample:

- ✓ Published Course Catalog
- ✓ COD (Common Origination and Disbursement)
- ✓ SIS (Student Information System)
- ✓ Financial Aid paperwork (RT24)
- ✓ Clearinghouse secure site Student Look-Up tab
 - ✓ Review *Enrollment History* and *NSLDS Reporting History* tabs
- ✓ NSLDS
 - ✓ Review "all active and inactive" Advanced Display Option for Enrollment Detail and Program Enrollment Detail pages

Regular Internal Enrollment Reporting Audit Between Annual Audits

Reviewing Title IV students in a known, variety of enrollment scenarios to mitigate Federal Aid Audit and Title IV compliance risk

First Time Freshman, First Time Borrower

Unofficial/Retroactive Withdrawal

Graduated Spring
Graduated Fall
Graduated Summer

Approved Leave of Absence 'A'

Federal Aid disbursed at prior institution but not your institution (for students with outstanding federal aid)

Pell Grant Only Recipient



Support Resource: Clearinghouse's Audit Resource Center (ARC)

Let us help by providing a compliance assessment and any support with next steps

- NSLDS compliance concerns?
- Federal financial aid auditor or program reviewer citing your school for enrollment reporting?

We are here for you to support your institution and the auditor through the enrollment reporting testing process

Please contact our dedicated Audit and Compliance resource:

Contact Clearinghouse's Audit Resource Center <u>auditresource@studentclearinghouse.org</u>

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Support Resources

Data Integrity OperationsEnrollment & Degree File Processing
schoolops@studentclearinghouse.org

Audit Resource Center
Federal Aid Audits & Program Reviews
auditresource@studentclearinghouse.org

NSLDS SSCR Error Questions sscrerrors@studentclearinghouse.org

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