



DECEMBER 2018 NEWSLETTER

IMPORTANT DATES:

December 12 (please note new date)

DJA Webinar - 1098-T Reporting
11:00 a.m. CST

December 14

FISAP Corrections Deadline

December 14

Active Confirmation of TG
Numbers Deadline

December 24-26

Christmas Holiday
DJA Closed

January 1

New Year Holiday
DJA Closed

January 2

DJA Webinar - Cohort Default
Rates
11:00 a.m. CST

January 27-28, 2019

PCCS Conference
Kansas City, MO

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- Conditional Acceptance
- Make-Up Hours & Overtime Charges
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- DJA Calendar

Have you heard the latest news regarding verification that was announced last week at the FSA Training Conference? Acting Chief Operation Officer for FSA, Jim Manning updated attendees of two important changes to the verification process. These changes are in response to the overwhelming feedback regarding the burden placed on students selected for verification. First, Manning shared that Financial Aid Administrators may soon accept a personal copy of tax returns to satisfy verification, this serves as a vast improvement over the previous requirement of official IRS tax transcripts. Second, in regards to verification of non-filing selected Independent students and the non-filing parents of selected Dependent students, if FAA's have no reason to doubt the legitimacy of the claim, they may accept a signed statement from the involved party certifying that they did not file and were not required to file a tax return for the 2016 tax year. Both announcements yielded huge rounds of applause from the audience of FAA attendees. I know personally the four team members DJA sent were ecstatic at the relief this should provide our clients in the completion of the verification process. Manning told the audience to expect an Electronic Announcement officially communicating these changes in the coming weeks. Read the DJA newsletter for a brief summary of topics shared at the conference.

As we celebrated 30 years in business this year, DJA is looking forward to new and exciting changes as we enter into another year of serving our many loyal clients. We are close to wrapping up development on our new software program and are excited to implement in 2019. Built with a strong focus on financial aid administration and developed in-house by our team of financial aid experts, we strongly feel this program will help streamline your processing and increase efficiencies internally for your schools.

It is hard to believe December has already arrived and the holiday season is quickly approaching. DJA extends to each of you our warmest greetings and best wishes for a Happy Holiday and prosperous New Year! A reminder that DJA will be closed December 24-26th, as well as January 1st in observance of the holiday. We hope you all take time to celebrate and be merry as well.

*Thank you and until next time, have fun!
Deborah John, President*



ANNUAL FSA TRAINING CONFERENCE SUMMARY

Each year Federal Student Aid hosts an annual training to give Financial Aid Administrators the opportunity to hear from Department of Education officials on ongoing initiatives and regulatory effort, as well as current training on a vast array of industry specific topics. This year the training took place at the Georgia World Congress Center Building in downtown Atlanta, Georgia. As mentioned in Deborah's announcement above, the Department of Education provided updates on a couple of verification changes in an effort to mitigate the burden the process places on students who have been selected. James Manning shared that students selected for verification is at a historical high with statistics showing schools on average have 30 percent of students selected, though Manning admitted for many institutions that number is even higher. He communicated that these changes came as a direct reflection of institutional feedback as recently as two days prior to the conference. However, it became evident throughout the conference that the announcement of the verification changes was all that would be shared and there was very little clarification or expansion on the topic in the following sessions. DJA is hopeful that more information will come in the upcoming Electronic Announcement that is touted to arrive soon.

Secretary of Education, Betsy DeVos truly set the tone for the conference in her keynote address when she declared a "crisis in higher education" and raised a red warning flag for students and American taxpayers in regards to the student federal loan debt. DeVos stated that the problem is one that requires change from all involved- the Government (the lender), the schools (the administrator) and the students (the borrower). Currently, FSA only requires schools to counsel the student twice regarding their federal student loan- once when the loan is taken out and once when the loan is due. DeVos outlined four core principles that must address in order for effective action to take place:

- 1) People- are our greatest national resource. Every individual deserves an opportunity to pursue an education that is the best fit for them.
- 2) Innovation MUST be unleashed and we have to provide an environment supportive of it.
- 3) We need to provide more accessible information to students.
- 4) Nothing is FREE- students must understand that the somewhere, someone is paying.

The Government must step up to be a more responsible lender. Schools have to inform students of the responsibility they have when they borrow federal student loans. Lastly, students must equip themselves with the knowledge to become a better consumer.

DeVos also took great pride in the NextGen initiatives and the implementation of the Mobile FAFSA App. Throughout the conference, Government officials shared the purpose of the NextGen initiative is to modernize FSA, create brand unity and increase the customer service experience for both borrowers and FAA's. NextGen aims to support innovation and change in our industry, right-size and clarify regulations to all involved parties and establish a unified system interface.

We could expand on so much more shared in the conference, but fortunately FSA has already made the conference sessions available on the IFAP website. We encourage clients who were unable to attend to take advantage of this invaluable training resource. Should you have any questions, DJA sent several team members and we would be happy to address any of your inquiries.



http://www.webcastregister.live/2018fsatc_records/registration_view_catalog_public.php.

FSA CYBERSECURITY COMPLIANCE

It is almost a year ago that the Department of Education announced a renewed focus on Cybersecurity Compliance and this message continued to be shared at the FSA annual training last week. Following up to the Active Phishing Campaign announced in an Electronic Announcement dated 08/31/18, the Department shared it is still monitoring the scam and warned institutions to continue to be hyperaware that the industry continues to be an environment ripe with PII data, thus making it a target for hackers. Officials warned schools to also educate students, as they continue to see a rise in Third Party Debt Relief scams, being sent to students advertising free assistance with paying off federal student loans. The sessions regarding Cybersecurity Compliance were much a review of the information DJA presented in our previous three newsletters in the Compliance Corner section. Additionally, we have developed a webinar presentation regarding this topic that can be found on our DJA website.

<https://ifap.ed.gov/eannouncements/083118ActivePhishingCampaignTargetStudentEmailAccount.html>

CONDITIONAL ACCEPTANCE AND TRIAL PERIODS OF ENROLLMENT

Schools may offer trial periods of enrollment to allow a student to “try out” a program, without incurring charges or receiving Title IV aid. A trial period can play a valuable role by allowing a student to attend classes for a brief period before making a financial commitment to regular enrollment in the program.

Some schools admit students provisionally, for example, until they provide further documentation, such as academic transcripts or test scores, or demonstrate an ability to succeed in the program by receiving acceptable grades in program coursework, the student is only provisionally accepted. Typically, the school will limit these students’ enrollment in terms of number of courses or enrollment status until they meet the necessary conditions.

If the student continues beyond the trial period and enrolls as a regular student, the school can pay him FSA grants for the entire payment period and loans for the period of enrollment. Students admitted as conditional are regular students only if the school officially accepts them into the eligible degree or certificate program. USDE does not define official acceptance or admission. If the student is merely allowed to take some courses before being officially admitted to the program, she is not considered a regular student and is not eligible until she is officially admitted.

The term “trial or conditional period” is used to describe the beginning of the student’s attendance in an eligible program, in a situation where the institution has not admitted the student as a regular student. The trial period provides an opportunity for a student to take classes on a trial basis before deciding to continue attending the program as a regular student, at which time the student would be responsible for program charges and would, if otherwise eligible, become eligible for Title IV program funds.



While the details of each program may vary, the trial period of attendance is a part of an eligible program and academic credit earned by the student will count toward the student's completion of that program if the student becomes a regular student after the trial period. Because this trial period is part of the eligible program, if the institution admits the student as a regular student after the trial period, total charges for the program would include the trial period, and, if otherwise eligible, the student could receive Title IV aid for the trial period.

For example, if an institution has an educational program that is 18 weeks in length and includes a four-week trial period:

- Student A completed the four-week trial period at which time the institution admits the student as a regular student. Student A would now be assessed institutional charges and become eligible for Title IV funds for the program, including the trial period.
- Student B completes two weeks of the trial period and decides not to continue enrollment. Student B is not assessed institutional charges and would not be eligible for any Title IV funds for enrollment during the trial period.
- Student C completed the four-week trial period at which time the institution admits the student as a regular student. Student C would now be assessed institutional charges and become eligible for Title IV funds for the program, including the trial period. However, after three more weeks as a regular student, Student C decides to withdraw from the program. The institution must perform a Return of Title IV Aid calculation to determine the amount of aid that the student earned as of the student's withdrawal date at the end of the seventh week as provided in the regulation at 34 CFR 668.22.

Policies and Procedures include Standards for Participation

Policies and procedures for a trial period of enrollment must specifically include information on which students are required to participate in the trial period and which students may participate at the student's option. Students participating in a trial period must also be provided with clear information about the trial period, including that they are not eligible for Title IV aid unless and until the institution admits the student as a regular student after the trial period. After or just prior to the end of the trial period, students need to confirm their intention to continue the program. Once determined to be a regular student, otherwise eligible students become eligible for Title IV funds back to the beginning of the payment or loan period, as applicable, including the trial period. The institution must ensure that students have the necessary books and other materials to succeed during the trial period.

Your school must also provide information describing the procedure for withdrawing after the trial period if the student decides not to continue enrollment. This information should make clear that students will not be eligible for Title IV funds during the trial period if they do not continue enrollment. Students who do not attend beyond the end of a trial period should only be charged a nominal fee (such as an application fee), if any, to participate.

For additional information visit the following links:

<https://ifap.ed.gov/dpcletters/GEN1112.html>



<https://ifap.ed.gov/fsahandbook/attachments/1819FSAHbkVol1Ch1.pdf> (pages 1-5)

MAKE UP HOURS AND OVERTIME CHARGE POLICIES

There is nothing to preclude your school from charging a fee for the completion of missed hours. However, to participate in the Title IV programs, an institution must at all times act with the competency and integrity necessary to qualify as a fiduciary. As a fiduciary an institution is subject to the highest standard of care. A school's policies surrounding overtime charges must be in line with this standard.

Your school should have a policy, in writing, which clearly explains all charges for each program, including charges for making up time. Your school's enrollment agreement sets the cost of tuition, fees, books, and kits. The agreement may also inform the students that additional overtime charges will be imposed if the student does not complete his/her program of study by a specified date. The agreement may provide a grace period after which a student would be charged for each additional hour he/she attended after the specified date and grace period elapsed. Charges for make-up hours should not be excessive!

Offer opportunities for students to make up time early and often. Do not set a policy that provides students a tight time frame for completing hours owed before the student begins incurring overtime charges. If you wait until late in the program, the students will not have sufficient time to make up the missing hours prior to reaching the expected completion date. Explain what your policy is regarding holding transcripts or diplomas if charges are not paid in full at graduation.

On an ongoing basis, provide the student with a full accounting breakdown of the overtime charges by hour. Always emphasize that Title IV funds may not be used to pay charges even if a school obtains a student's (or parent's) authorization to do so, and have the student sign off on the documentation to back your records. Whatever you decide for your policy, run it by your accrediting and state agencies, and keep in mind that you must follow it!

NOTE: This restriction on paying overtime charges applies to both clock-hour and non-term credit-hour programs. For example, some clock-hour programs assess "overtime charges" for students who don't complete the program within an established timeframe. Some credit-hour programs also charge additional tuition or fees for each course a student takes if the student fails to complete his/her program(s) within an established timeframe. In both cases, such charges may not be counted in the Title IV COA, and Title IV funds may not be used to pay for the additional charges.

REMINDER: TITLE IV AID DISBURSEMENT REPORTING, EXCESS CASH, AND RECONCILIATION REQUIREMENTS



Important

Reconciliation is a process that a school must perform in operating the FSA programs. It is also a tool that a school should use to ensure that its management of the FSA programs is optimal. Most importantly, reconciliation is a shared responsibility. That is, the business office and the financial aid office are equally responsible for performing the periodic reconciliation that is required to make certain that a school is managing the FSA programs as they should be managed. This responsibility involves much more than the mere sharing of reports. It requires joint action by the financial aid and business office to identify discrepancies and to correct them in a timely manner.

Last year at this time, in an electronic announcement posted to the IFAP website on 11/22/17, the USDE reminded schools of the general disbursement reporting, excess cash, and reconciliation requirements for all Title IV programs. DJA feels the topic deserves to be mentioned again as it is such an important facet of administering financial aid. Because these requirements apply to disbursement *and* financial data, both the Financial Aid Office and Business Office should review the information provided below and in this announcement at

<https://ifap.ed.gov/eannouncements/112217TitleIVAidDisburseReportExcessCashReconcilRequirements.html>

Disbursement Reporting Requirements

The disbursement and disbursement adjustment reporting requirements for all Title IV aid are announced in an annual Federal Register Notice. The most recent Federal Register Notice, published on [June 27, 2017](#), specifies that a school must submit disbursement records no later than 15 days after making the disbursement or becoming aware of the need to adjust a student's previously reported disbursement.

Excess Cash Requirements

The USDE considers excess cash to be any amount of Title IV funds (other than Federal Perkins Loan Program funds) that a school does not disburse to students or parents by the end of the third business day after the date the school (1) received the funds from the Department, or (2) deposited or transferred to its federal account previously disbursed Title IV funds received from the Department. In some circumstances, cash may be held for up to 7 calendar days if a school meets the excess cash tolerance and can disburse the aid to students within that time frame. In no circumstance should cash balances remain beyond the 7-day period.

Reconciliation

Reconciliation is the process by which a school reviews and compares Title IV aid (grants, loans, and campus-based aid) recorded on the USDE's systems with the information in the school's internal records. Schools should reconcile both internally (between Business Office and Financial Aid Office data) and externally



(between school data and the COD System/G5). Through reconciliation, disbursement and cash discrepancies are identified and resolved in a timely manner to ensure the school meets all regulatory requirements. Schools must document their reconciliation efforts and retain this documentation for auditing purposes.

At a minimum, your school should reconcile its FSA financial records monthly. However, the more frequently your school performs reconciliation, the more likely you will be able to identify issues and resolve them before they become part of a systemic problem. Frequent reconciliation is an important internal control procedure that can make a significant contribution to increasing the overall program integrity of the FSA programs at your school. In addition, schools that have systems in place to compare and identify discrepancies between their internal records and data from USDE reports will find that the required monthly reconciliation is much easier and makes closing out a year less time consuming.

Internal reconciliation

Discrepancies that occur between the financial aid and business offices are usually caused by a lapse in communication. Note that these discrepancies often do not show up in a comparison of the financial aid office's records to COD, or in the comparison of drawdowns/returns between the business office and G5 payment system.

Before you compare your school's records to the USDE's records, you should ensure the financial aid office and the business office agree on the amount of funds that should have been drawn down from G5 to cover the funds disbursed to students. The first step in the reconciliation process should be to confirm that business office records of actual disbursements posted to student accounts are consistent with financial aid office records of student award and scheduled disbursement amounts.

Internal reconciliation should also include steps to reconcile cash transactions such as drawdowns and refunds of cash. Your school should ensure that bank statements correctly reflect all funds drawn or returned and confirm that any returns of Title IV aid calculated by the financial aid office are reflected correctly in the business office student account records. Ensure that any funds not necessary for immediate use have been returned to the USDE.

In addition, you should also compare business office and financial aid office records of adjustments (refunds of cash) made during the month. Often, returns of cash due to withdrawals performed by the financial aid office aren't applied by the business office. Just as often, adjustments made by the business office aren't noted in the financial aid office. Either of these omissions can cause an internal discrepancy that will affect a school's Ending Cash Balance and should be resolved before a school begins its external reconciliation process.

External reconciliation

During internal reconciliation, the school will have resolved any differences between records in the financial aid office and those in the business office. In external reconciliation, a school will reconcile its records to the USDE's records.



Final Reconciliation

If a school is meeting all disbursement/adjustment reporting, excess cash, and reconciliation requirements, a final reconciliation should begin no later than the last award or payment period end date at the school for a given program and year. A school should be able to reconcile to a zero ending cash balance soon after its final disbursements and should not carry an ending cash balance (positive or negative) for an extended period.

Recommended general reconciliation practices

A key factor in facilitating reconciliation is staying on top of the process. USDE encourages schools to:

- define responsibilities of key individuals and offices;
- document your reconciliation procedures;
- build in regular communication between your business office, financial aid office, and school's technical staff;
- compare internal student accounts and business office/bursar records with financial aid office records and resolve any discrepancies;
- balance all subsidiary accounts to the general ledger;
- ensure that all drawdowns and refunds of cash are accounted for and applied to the correct program year;
- ensure that all batches have been sent to and accepted by the COD system, all disbursements and adjustments are accurately reflected on the COD system, and all responses are imported into the school's system;
- ensure that all un-booked loans are booked or inactivated (reduced to \$0) for Direct Loans;
- resolve all outstanding rejected records;
- return all refunds of cash via G5; and
- request any remaining funds owed to the school based on actual disbursements accepted by the COD System

Reconciliation and Third-Party Servicers

If your school uses a third-party servicer, your school is ultimately responsible to ensure that all regulatory requirements are being met and that your school is reconciling on a regular basis. You should request and retain documentation of your reconciliation efforts. Also, a part of your reconciliation should include ensuring that your schools internal records match what is at the servicer as well as what is in the COD System.

DJA not only reconciles Direct Loan accounts for our clients on a monthly basis, we also reconcile Pell each month to ensure they are balanced. The final reconciliation for both programs is done by our team as well. Although DJA reconciles the DL SAS, Pell Grant YTD, FSEOG and FWS reports to our accounting records monthly, institutions must do an internal reconciliation to these reports as well. Please reconcile that all disbursements have been credited to the student's accounts and any credit balance was returned within the required 14 day time frame.

Keep in mind that if your school is under the Heightened Cash Monitoring payment method, a school must credit a student's ledger account for the amount of Title IV funds the student or parent is eligible to receive,



and pay the amount of any credit balance due under 668.164(h) before the school submits a request for funds.

UPDATED NSLDS ENROLLMENT REPORTING GUIDE (NOVEMBER 2018)

The [updated National Student Loan Data System \(NSLDS\) Enrollment Reporting Guide](#) is a comprehensive document containing step-by-step instructions for reporting enrollment information to NSLDS®. The November 2017 update introduces a new chapter, Chapter 8: Monitoring of Reporting Compliance, to provide detailed information about the online tools and reports available for schools to monitor compliance with NSLDS enrollment reporting requirements. The guide has also been updated to reflect guidance on enrollment reporting that has been posted to the Information for Financial Aid Professionals (IFAP) website since the guide's last publication (November 2016). Refer to the "What's New?" section at the beginning of the guide for a complete description of all updates.

The updated NSLDS Enrollment Reporting Guide (November 2018) is available at <https://ifap.ed.gov/nsldsmaterials/NSLDSEnrollmentReportingGuide111418.html>.

COMPLIANCE CORNER SATISFACTORY ACADEMIC PROGRESS (SAP) PACE OF PROGRESSION AND MAXIMUM TIME FRAME

Your SAP policy must specify the *quantitative* standard (pace) at which students must progress through their program to ensure that they will graduate within the **maximum timeframe**, and each academic progress check must measure this.

It is important to understand how pace relates to maximum timeframe. Maximum timeframe refers to a period that is set by the school but that can't be longer than 150 percent of the published program length. The maximum timeframe percentage determines what percent the minimum pace of completion should be set at. Schools often talk about monitoring maximum timeframe, but what they're actually monitoring, or should be monitoring, is the pace of completion. If the student is maintaining the required pace of completion, he/she will be able to finish the program of study within the maximum timeframe. Misalignment of maximum timeframe and pace of completion is a frequent audit and program review finding, so you need to make sure that these components are properly aligned in your policy.

Pace and maximum time frame are not identical, but are not isolated components either. Both are part of the quantitative measure by which student progress is monitored in that the pace calculation is how you monitor the maximum time frame. The pace at which a student is progressing is calculated by dividing the total number of hours the student has successfully completed by the total number he/she has attempted.



Below is a simple example of how a school would calculate pace of completion for a term based credit hour program. Probably the most common scenario found in traditional credit hour schools is a maximum time frame set at 150%. The minimum pace of completion required to complete a program within 150% maximum time frame would be 67%.

- BA requires 120 credits for graduation
- Maximum Time Frame = 150% X 120 = 180 credits
- Pace calculation
 - $120/180 = 66.6\%$ (usually rounded to 67%)
 - Student earning 67% of credits attempted is on pace to complete the program within the maximum time frame

While 150% is the longest amount of time that is allowed for maximum time frame, a school can set a shorter maximum time frame if it chooses. Setting a shorter maximum time frame might be something a school would want to do for a shorter program. In this example, the maximum time frame is set at 125%; as a result, the minimum pace of completion required to complete the program within the 125% maximum time frame would be 80%.

- BA requires 40 credits for graduation
- Maximum Time Frame = 125% X 40 = 50 credits
- Pace calculation
 - $40/50 = 80\%$

In this example, a student earning 80% of credits attempted is on pace to complete the program within the maximum time frame

Clock hour schools evaluate cumulative clock hours required to complete as expressed in calendar time (weeks, etc.). Your school must review a student's academic progress at the end of a payment period to determine if a student is eligible for a subsequent Title IV payment by selecting one of the following options for all students in the program. There are three options for clock hour schools:

Option 1: At the point when the student's scheduled clock hours for the payment period have elapsed, regardless of whether the student attended them.

This may not match the total calendar weeks of the program, for example, if you close the school for two weeks at Christmas, you need to be sure to keep track of the scheduled weeks in the program in order to properly calculate the maximum time frame for a clock hour program. In this example, the student should have completed 450 scheduled hours in 15 weeks of instruction when the pace was evaluated. However, the student has only completed 300 hrs. in 10 weeks of instruction. At 67%, this student has met the minimum amount required to keep pace within the 150% maximum time frame.

- 450 hours scheduled, student has completed 300 hours
 - $300 \text{ hours}/450 \text{ hours} = 67\%$
 - $10 \text{ week}/15 \text{ weeks} = 67\%$

The next SAP review is at 900 scheduled hours.

Option 2: At the point when the student has attended the scheduled clock-hours.



In this example, at the time 600 hours have elapsed, the student has attended 450 hours. Calculating in terms of hours, the pace would be $450/600 = 75\%$, or as expressed in calendar time, $15 \text{ weeks}/20 \text{ weeks} = 75\%$. Note that both items must be checked according to the definition of maximum timeframe in Sec. 668.34(b) and that standard rounding is allowed.

- 600 scheduled hours have elapsed, student has attended 450 hours
 - $450 \text{ hours}/600 \text{ hours} = 75\%$
 - $15 \text{ weeks}/20 \text{ weeks} = 75\%$

Although the student has attended the hours, the student is not eligible for the second disbursement until he successfully completes 450 hours and 15 weeks of instructional time.

Option 3: At the point when the student successfully completes the scheduled clock-hours for that payment period.

Here's an example of how this option works. The student successfully completes the 450 hours required for the payment period at the point where he was scheduled to complete 600 hours. The calculated pace in hours would be $450/600 = 75\%$, or as expressed in calendar time, $15 \text{ weeks}/20 \text{ weeks} = 75\%$. Remember that schools must evaluate both the clock hours and weeks of instructional time.

- 450 hours completed, 600 hours were scheduled
 - $450 \text{ hours}/600 \text{ hours} = 75\%$
 - $15 \text{ weeks}/20 \text{ weeks} = 75\%$

Because the student has successfully completed both the hours and the weeks in the payment period, the second disbursement would be made at this time

Note: Non-Term Credit-Hour Schools have only two options. 1) On the date when the student was scheduled to earn the credit-hours; or 2) when the student successfully earns the credit-hours

Checking a student's pace of completion allows for variations of enrollment status since you look at the percentage of classes successfully completed rather than the number. Also, you can use a graduated completion percentage for each year of a program. For instance, your policy can permit students to complete a lower percentage of their classes in the first academic year but require them to complete an increasing percentage in subsequent years so that they finish their program in time. A student is ineligible (via the maximum timeframe element) when it becomes mathematically impossible for him to complete his program within 150% of its length if it is an undergraduate program, or within the maximum timeframe established by the school if it is a graduate program. In this situation, an appeal would be possible if your school accepts appeals.

For more information DJA conducts a webinar on Satisfactory Academic Progress each April as part of our Monthly Webinar Training series. Past webinars are accessible on the DJA website.



DJA CALENDAR

2018 DJA WEBINAR SCHEDULE

Upcoming DJA Webinars:

1098-T Reporting – Wednesday, December 12: 11 a.m. CST (PLEASE NOTE THIS DATE IS A WEEK LATER THAN PREVIOUSLY SCHEDULED)

NOTE: There may be a difference between DJA local time and your time zone. To determine your time zone equivalent, click on this link to view a time zone map: <http://www.worldtimezone.com/time-usa12.php>

Webinars are free to clients. There is a fee for all others who may be interested in joining us for these presentations. Invitations are automatically sent to all clients, however if you do not receive an invitation, email Andrew Packard at apackard@gotodja.com. After registering, you will receive the log-in information. Questions can be directed to Andrew by email or by calling toll free at 1-800-242-0977.

JAN 2	Cohort Default Rate
FEB 6	Consumer Information, Record Keeping and Disclosures
MAR 6	Administrative Capabilities
APR 3	Satisfactory Academic Progress
MAY 1	Return of Title IV Funds (Including LOA)
JUN 5	General Participation Requirements
JUL 3	Campus Crime Report
AUG 7	Entrance and Exit Counseling
SEPT 4	Cash Management
OCT 2	Enrollment Reporting Using NSLDS
NOV 6	Program Integrity (Audits, Program Review)
DEC 4	1098-T Reporting

Region VII PCCS Conference – Kansas City, Mo. January 27-28, 2018

As in previous years, this upcoming event will be in Kansas City at the KC Airport Embassy Suites Hotel. This PCCS Workshop is open to all postsecondary schools in the Region VII area. DJA will be in at this conference. We would love to visit with you!

Disclaimer: The information presented in this Newsletter is provided as a service and represents our best efforts to assist institutions with federal student aid regulations. We have collected information we believe to be important in finding and obtaining the resources for administering federal student aid; however, we assume



no liability for the use of this information. The information in this newsletter does not constitute, and should not be construed as, legal advice.