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**Financial Aid Office Assessment
and Desk Audit**

Central Connecticut State University

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**CENTRAL CONNECTICUT STATE UNIVERSITY
OFFICE ASSESSMENT
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INTRODUCTION

At the invitation of Charlene Casamento, Central Connecticut State University (CCSU) Chief Financial Officer, Judy Schneider, Senior Consultant, and Michael Shields, Consultant, of Financial Aid Services (FAS) visited CCSU on October 16-20, 2017 to conduct a *Financial Aid Office Effectiveness Review and Desk Audit*. The impetus for this review was the recent placement of CCSU under Provisional Status with regard to Federal Student Aid participation by the U. S. Department of Education (ED), based on “serious, repeated or systemic deficiencies” reflected in audit findings included in the State of Connecticut Single Audit Report, leading to ED questioning the University’s administrative capability.

During the five-day assessment, Judy Schneider and Michael Shields met with the following individuals:

- Dr. Zulma Toro, President
- Charlene Casamento, Chief Financial Officer
- Dr. Susan Pease, Interim Provost and Vice President for Academic Affairs
- Rich Bishop Director of Financial Aid
- Betsy Fangiullo, Bursar
- Larry Hall, Director of Recruitment & Admissions
- Patrick Tucker, Registrar
- Lisa Bigelow, Director of Institutional Advancement
- Chris Simcik, Director, Administrative Technical Services
- Rob Rak, Project Manager, Information Technology
- Ray Hernandez, Associate Dean of Student Affairs
- Brian Wood, Director of Administrative Accounting
- Brian Vaneroef, Associate Director of Administrative Accounting
- D’Lon Wilcox, Fiscal Administrative Assistant, Payroll
- Kathy Moore, Grants Administration Manager
- Lisa Bucher, Budget and Accounting Assistant
- Paul Rossitto, Interim Director, Career Success Center
- Yvonne Kirby, Director, Institutional Research & Assessment
- Paula Bunce, Institutional Research Specialist
- Shiann Rutledge, Retired Perkins Loan Administrator
- Office of Financial Aid Staff:
 - Keri Lupachino, Associate Director
 - Gladys Colon, Assistant Director
 - Frank Bitetto, Assistant Director
 - Sarah Leone, Financial Aid Counselor
 - Anthony Martinez, Office Assistant
 - Colen Moore, Office Assistant
- Student Focus Groups – 7 current students

EXECUTIVE SUMMARY

The placement of CCSU under Provisional Status by the U. S. Department of Education based on recent audit findings was the impetus for the Office Assessment and Desk Audit performed by Financial Aid Services. The Financial Aid Office Assessment conducted by Senior Consultant Judy Schneider included meetings with key stakeholders across the campus (see list above) and each of the administrators from other offices interviewed by the consultant expressed commitment to implementing any changes necessary to achieve the University's restoration to full participation in Federal financial aid programs.

The Desk Audit, conducted by Consultant Michael Shields, included interviews with each of the staff members within the Financial Aid Office. The staff appear to be competent and use technology to administer financial aid programs in such a manner that mitigates concerns about compliance with Title IV regulations. The staff is committed to providing quality customer service to the CCSU students and community.

The Director of Financial Aid (the Director) has been at CCSU for 15 years and had a number of years of prior financial aid experience before coming to CCSU. The Director is knowledgeable about the regulations governing student financial aid. He strives to operate the university's aid office in compliance with federal and state regulations and has automated processes to improve efficiency and accuracy. Although each of the administrators from other offices interviewed by the consultant characterize the Director as a professional committed to delivering financial aid timely, properly, and accurately, some expressed concern about the Director's unwillingness to communicate and to collaborate with other office administrators. Several expressed a perception of the office as adversarial and territorial.

The overall office assessment identified the need for very few corrective actions related to compliance. Observations focused on staff organization, communication, and training, collaboration with external offices, and creating a more collaborative climate.

The consultants express sincere appreciation to the Central staff and students who extended a warm and open welcome during their visit to the campus.

INSTITUTIONAL OVERVIEW

Central Connecticut State University, founded in 1849 as the New Britain Normal School, a teacher-training facility, Central is Connecticut's oldest publicly supported institution of higher education and the largest of four comprehensive universities within the Connecticut State Colleges & University System. The University, located in New Britain, now serves nearly 9,800 students in 100 undergraduate majors in more than 80 fields of study and 2,000 graduate students in 41 academic fields.

Central is accredited through the New England Association of Colleges and Schools, Inc., and the Connecticut Board of Governors for Higher Education.

The National Center of Education Statistics¹ reports

- 85% of the full-time beginning undergraduate students received some type of financial aid in 2015-16
- 65% of all undergraduate students received some type of grant or scholarship aid in 2015-16
- 65% of all undergraduate students received some type of federal student loans aid in 2015-16
- 78% of full-time undergraduate students and 50% of part-time undergraduate students who began their studies in Fall 2015 returned in Fall 2016
- 54% of full-time first-time students who began their studies in Fall 2010 graduated within 150% of the "normal time" to completion for their programs

¹ National Center for Education Statistics, College Navigator search. <http://nces.ed.gov/collegenavigator>

ADVANCE PREPARATION

The Financial Aid Office Assessment involves extensive research and discovery with the goal of pinpointing development opportunities and creating process enhancements by exploring the Office relations with other key departments and by collecting data about those departments' roles and operations. In addition, the assessment considers how the aid office's objectives contribute to the institution's overall strategic plan.

In advance of the on-site visit, Central's Chief Financial Officer coordinated the team's provision of materials at the request of Financial Aid Services for review. The information provided included, but was not limited to, the following:

- **Organizational Structure:**
 - Organizational Chart of College administration
 - Organizational Chart of Financial Aid & Veteran Services Office, with job descriptions and names of individuals in the positions
 - List of other individuals, besides Financial Aid staff, directly involved in the administration of financial aid, e.g., FWS employment, assignment/oversight of other campus employment, administration and collections of Perkins Loan, administration of scholarships, administration of Veterans' services, management of student accounts, accounting of federal funds.
- **U.S. Department of Education Institutional Eligibility and Accreditation Information**
 - U.S. Department of Education Program Participation Agreement (PPA)
 - U.S. Department of Education Eligibility Certification Approval Report (ECAR)
- **College academic and student life policies and programs**
 - CCSU Web Site
 - College Catalogs
 - Term Course Schedules
 - Student Handbook
 - Student Employee/Employer Handbook
 - Institutional Security Program Documentation
- **Consumer Information**
 - Copy of the consumer information disclosure statement
 - Any survey studies and/or reports regarding job placement
 - Notice sent annually to employees containing information on Drug and alcohol prevention
 - Campus Security Report (or the disclosure statement) sent annually to current students and staff
- **Financial Aid**
 - ISIRs received (number will include multiple transactions): 59,576
 - ISIRs processed (unduplicated count): 8,018
 - ISIRs process that were federally selected for verification: 2,994

- Number of aid recipients (unduplicated)
 - 2016/17 = 8,554
 - Number of recipients and amount of aid disbursed 2016-17 award year
 - Federal Pell: 5,502/\$21.154.946
 - FSEOG: 147/\$368,277
 - FWS: 291/\$427,996
 - Direct Loan and PLUS: 11,074/\$51,924,502
- Financial Aid Policies and Procedures manual
- Cost of Attendance Budgets and methodology used for determining them
- Set of Satisfactory Academic Progress (SAP) letters, e.g., probation, suspension, appeal, etc.
- Packaging policies
- Examples of communications sent to students
- Entrance and Exit counseling materials
- Examples of forms completed by students
- Examples for internal forms for office

Recruitment/Admissions

- Enrollment management strategic (or action) plan (if available), including enrollment history
- Examples of recruitment publications
- Examples of admission communications and forms

Financial Statements and DOE Reports

- Stafford Loan cohort default rate (most recent)
- Audited financial statements for the two (2) most recent years audited (assumes fiscal year is July 1-June 30), including management letter
- Audit of Expenditures of Federal and State Financial Aid Funds for the (2) two most recent years
- Fiscal Operations Report and Application to Participate (FISAP) for (2) two most recent years (not provided)
- Copy of GAPS summary of accounts for Pell, SEOG and FWS
- Documentation of end-of-year reconciliation for most recent year reconciled including the Federal Pell Grant Program, Stafford and PLUS Loan programs and the state programs
- Letter and findings from last state audit

Other Offices' documents

- Examples of Student Account record
- Example of Student Billing
- Example of Student Enrollment Record
- Example of Academic Transcript
- Example of add/drop and withdrawal forms
- Example of Student Employee Time Sheet

OVERALL OBJECTIVES OF THE FINANCIAL AID ASSESSMENT AND DESKTOP AUDIT

The purpose of the five-day consulting visit was to:

- Examine Current Business Practices
- General Overview and Assessment of Financial Aid Operations
 - Financial Aid Policies and Procedures Manual
 - Management Reports
 - Financial Aid Application Review Technology Utilization and Functionality
- Administrative Capability and Adherence to Regulations
- Staffing and Financial Aid Management
- Customer Service
- Communications with Students and Other Campus Offices

Specific Objectives of the Financial Aid Desktop Audit

The desktop audit is a high-level documentary review of policies and procedures. The purpose of the 5 day consulting visit was to assess the organizational design and workflow in the financial aid office and to recommend staffing and organizational changes if needed that will improve the office's effectiveness, efficiency and quality of customer service. In addition, the audit verifies that the financial aid department has developed and implemented effective best practice policies and procedures in compliance with Federal regulations to competently oversee Administrative Capabilities of Title IV Aid.

The analysis included the consultant's evaluation of:

- Office procedures and practices, with particular attention given to redundancies and inefficiencies.
- Organizational structure, to determine appropriate staff positions, staff size, job assignments and reporting relationships for effective and efficient customer service oriented operation.
- Staff needs, such as training, professional development, physical space.
- General overview and assessment of Financial Aid Operations
- Technology Utilization and Functionality
- Administrative Capability

The assessment was performed with the following definitions in mind:

- Effective defined as "having the intended or expected result"
- Efficient defined as "exhibiting a high ratio of output to input, producing with a minimum of waste, expense or unnecessary effort"

Quality customer service is defined as responding to clientele's (students, parents, faculty, staff and outside agencies) requests for information/assistance in a timely manner while meeting or exceeding expectations whenever possible.

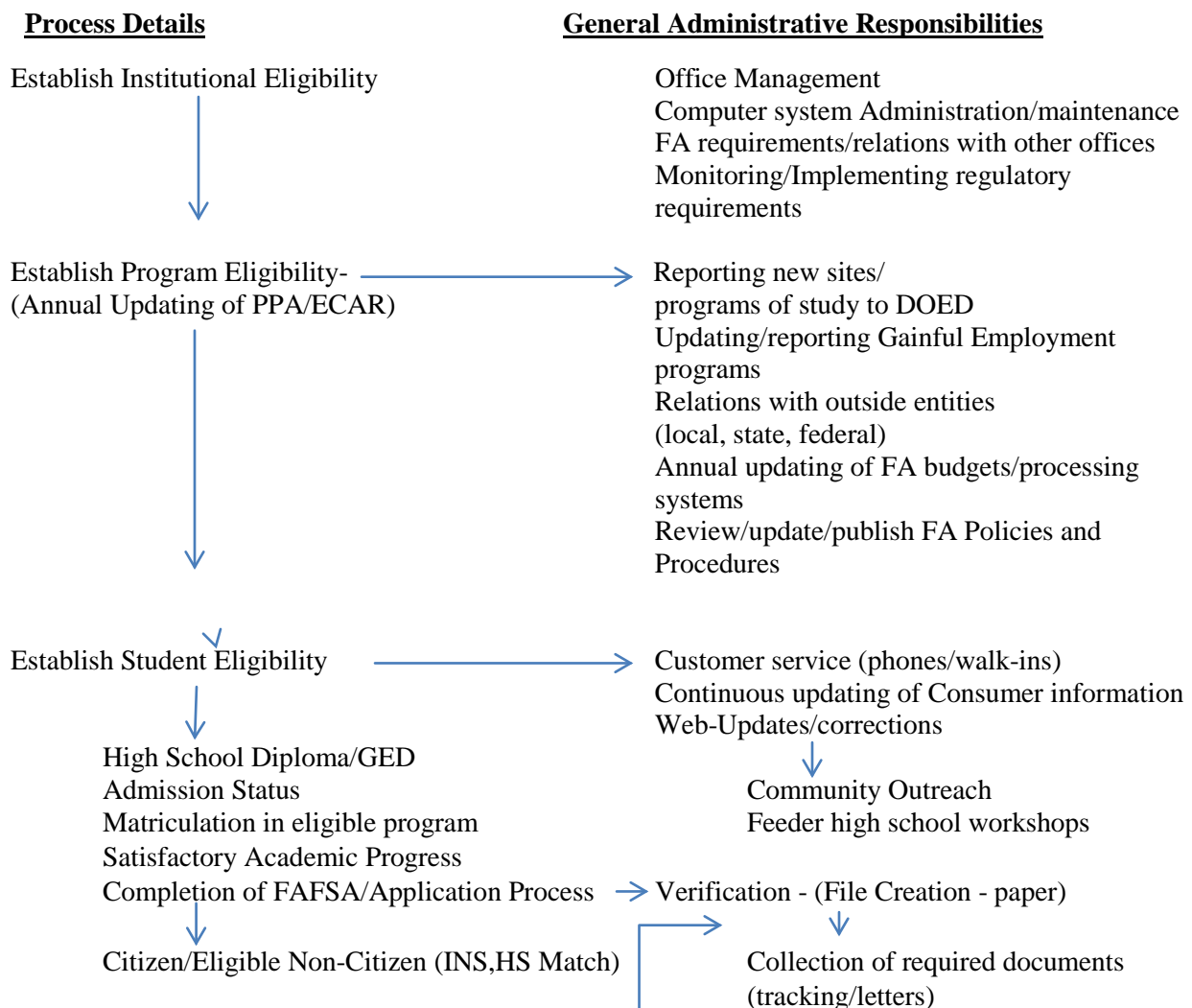
It is the opinion of the reviewer that this report will provide an objective assessment and recommendations for tailoring the staff configuration to maximize efficiencies and customer service. This report combines the findings and recommendations of the Desk Audit and the Office Assessment report as the reports cannot stand alone, and the reader should recognize that the implementation of one set of recommendations without the other will not accomplish the institution's goals with regard to financial aid delivery. One should also recognize that full implementation of these recommendations will happen over time and the benefits may not be recognized immediately, but at a minimum over the course of one full financial aid cycle. For example the 2017-18 financial aid cycle began October 1, 2016 (applications accepted by the Central Processing System [CPS]) and will run through September 30, 2018 (annual federal year- end report due). This report addresses the overall well-being of the financial aid office; it also provides a comprehensive process and procedure review and interoffice interaction recommendations.

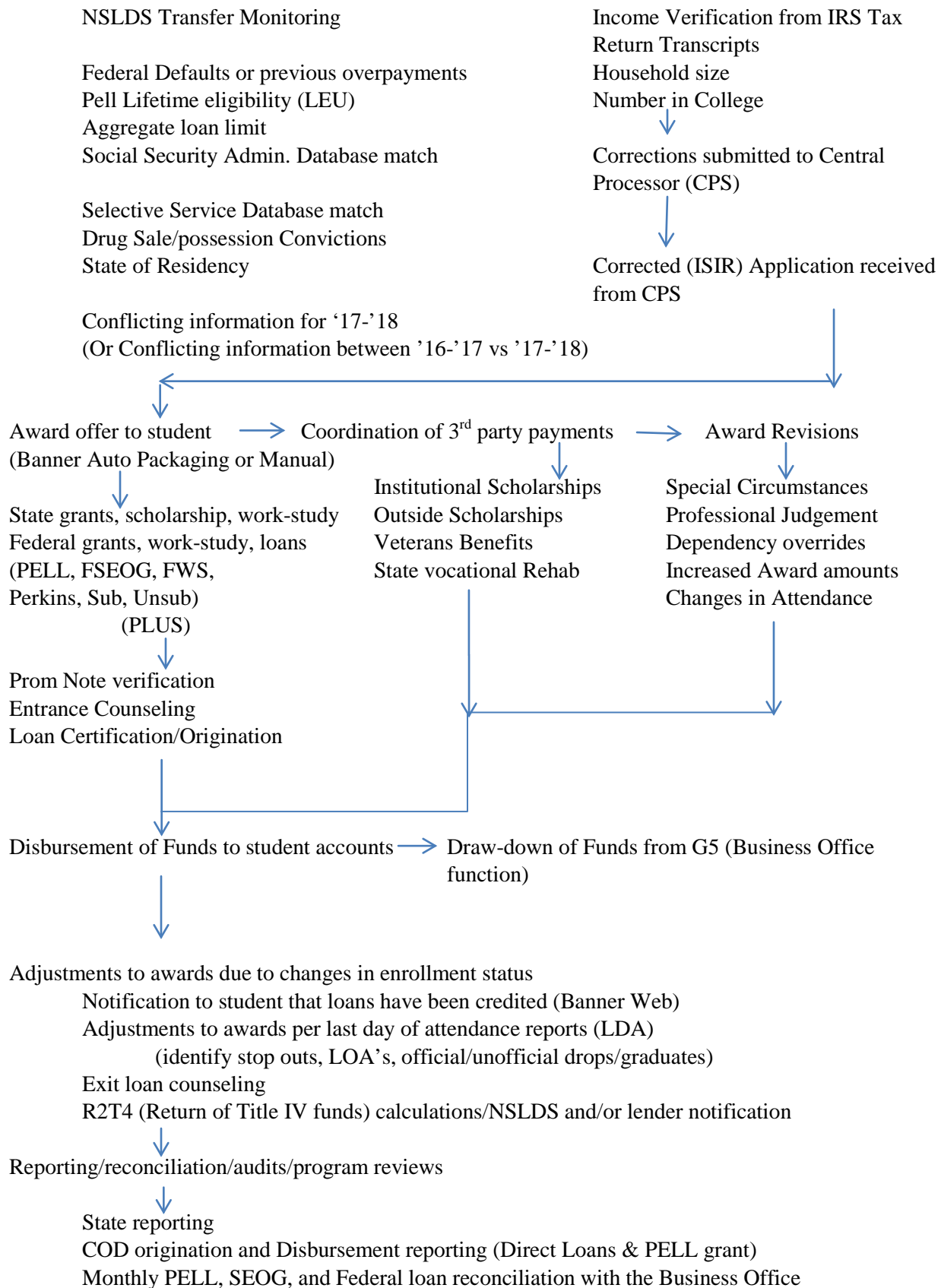
OVERVIEW OF THE FINANCIAL AID PROCESS

The process of delivering financial aid to eligible students is complex and multifaceted. Professional staff must develop and exhibit high levels of specialized knowledge and skill and be adept at multi-tasking. Financial Aid delivery is highly regulated by state and federal governing bodies and is subject to frequent change. Technological advances in higher education administration have provided automated systems to help streamline processes that deliver aid to the majority of applicants, assuring regulatory compliance. However, to properly utilize technology available requires a well-trained customer- service-oriented staff, dedicated IT support and an excellent file management process/system.

The following flow chart represents the basic financial aid process, from start to finish. While it is inclusive of the processes and job functions needed, it is far from all-inclusive when considering the policies and procedures to accomplish the tasks the chart identifies. It does however allow the reader to understand the importance of having adequate professional staffing that have the training and unique skill sets to perform these functions, as well as a leadership team with a strategic vision and systems approach to manage both people and workflow.

Figure 1(Flow Chart)





Clearinghouse (Student Status Confirmation reporting)
VA certification
Fiscal Operations Report and Application to participate (FISAP)

ORGANIZATIONAL STRUCTURE AND NASFAA STAFFING MODEL

An analysis of CCSU's staffing, based on the National Association of Student Financial Aid Administrators (NASFAA) statistical tool for computing the staff size relative to comparable institutions, indicates that a total of 15.68 full-time staff compares to other institutions of CCSU's type, size, and location. Additional information regarding the NASFAA Staffing Model has been provided to the CFO via an email of November 16. (See Appendix A.) The consultants are impressed with the ability of the current staff of 8 FTE to accomplish what they do as quickly as they do. The consultants believe this is the result of the extremely high level of automation and use of the Banner system. (See section on Functionality and Utilization of Technology later in this document.)

Financial Aid Staff interviews

Our consultant met with each of the Financial Aid Staff members; the interviews were an hour in length and in confidence. There were a number of similar questions; the purpose was to gather staff opinions and information as to the following:

- Office work environment
- Workflow processes and assignments
- Level of technology usage and knowledge
- Years of experience in Financial Aid
- Years working in CCSU financial aid department
- Identify training needs
- Individual career goals
- Relationship with Director of Financial Aid
- Department strengths

Office work environment

The staff believes the office has a healthy working environment; coworkers have a professional relationship built on mutual respect for one another. The work schedules accommodate staff(s) needs with evening and weekend work hours assigned as needed which is mainly for orientation and outreach events.

Workflow processes and assignments

The current job descriptions are somewhat outdated with the majority of assignments, task and duties not aligning with the current roles. Part of this can be attributed to the fact that job descriptions are created at the state level based on CCSU being part of the state postsecondary public university system. Therefore staff duties are not clearly identifiable (in writing) and variation at the Assistant Director of Financial Aid position is a good example of the disparity. We did not identify any gaps in the processing of aid applications nor program management. Maximizing the use of technology within the workflow processes is noticeable in the volume of work that is being done given the staffing level. This is directly attributed to the Director of Financial Aid's strong knowledge of the Banner Student Information System (SIS). There are some processes that surprisingly are still manual and with a high potential for errors. These processes are Posting of Foundation Scholarships and Listing of Federal Work-Study Position Requests. It is our opinion that both can be automated which will require coordination and collaboration with other departments within CCSU.

Level of technology usage and knowledge

The entire staff came across as having an adequate level of knowledge of the Banner SIS in order to perform their job duties. There were some staff that expressed a desire to learn more about the SIS beyond the user level, getting to understand and learn how the schools profile is set up in the system for the upcoming fiscal year, creation of reports and updating SIS based on Banner upgrades and federal, state and institutional regulatory changes. Currently the Director is the only (Super User) person within the department that manages the financial aid profile and updates. This puts the University at risk in the event the Director is out of the office for any unforeseen extended period of time. It has been noted there are others on campus that have Banner knowledge beyond user level and can step in to perform system maintenance if needed. We strongly recommend hiring an Associate Director of Financial Aid that is a “Banner Power User” as well as developing/training staff members to become power users.

Financial Aid years of experience/Years with CCSU Financial Aid Department

It was noted that two-thirds of the staff had no prior financial aid experience before working at CCSU. The staff years of experience range from the most senior, Colen Moore – 27 years, to the newest, Sarah Leone - 5 years. The average number of years working in the financial aid office at CCSU is 12.5 which indicates stability.

Training needs

It is mentioned in “**Level of technology usage and knowledge**”, Recommendation 1, that some staff are trained to become Banner power users. This was expressed by some of the staff. Also there are areas where cross training is recommended such as importing and exporting of information with COD, NSLDS and processing R2T4s. Ongoing Customer Service Training of Staff and Student-workers was mentioned by staff to improve the quality of service at the front counter as to knowing what type of information is appropriate to discuss in an open work area. Staff indicated they would like to take part in more off campus training workshops and attend conferences; this was something they were allowed to do in prior years but the number of opportunities has been fewer over the past years due to budget constraints.

Individual career goals

Some staff (Assistant Director Frank Bitetto, Financial Aid Counselor Sarah Leone and Office Assistant Anthony Martinez) expressed a desire to pursue a professional career in financial aid so training opportunities and staff development is very important to them. Another (Assistant Director Gladys Colon) wants to be more involved with financial literacy programs and outreach activities within the community.

Relationship with Director of Financial Aid

Overall the Financial Aid Staff has a great respect for the Director and his leadership but would like for him to take the lead in initiating:

- Regular staff meetings (we recommend weekly meetings)
- Creation of a formal process developed for cross training of staff
- Better communication and collaboration between departments
- Re-evaluation of staff work load and duty assignments to better utilize staff skill sets

Position of Perkins Loan Administrator

The consultants interviewed the recently retired Perkins Loan Administrator. During the interview it was reported that CCSU utilizes a third party vendor, "University Accounting Services," that over the past several years serviced the Perkins Loan program 100%. Also as of September 30, 2017 the program has expired; no new loans can be originated. Based on this information it is our recommendation that the position of Perkins Loan Administrator and the Assistant Administrator be repurposed within the Student Accounts Office under the leadership of the Bursar. We estimate approximately 10 hours/week can be allocated within this new role, with primary Perkins duties of reviewing and monitoring reports and updates from the vendor. (# years of service; overstaffed)

Department Strengths

The Financial Aid Office currently uses the Banner Student Information System to perform its verification and C-Code processing of Student Aid Reports. It is a system that is very efficient and effective in controlling regulatory requirements and guidelines. The financial aid staff at CCSU is trained on how to reconcile students' financial aid applications that have been selected for verification and those who have C-Code(s) assigned to them. The check and balance process within the Banner system assures required documentation and or document(s) are received, reviewed and verified prior to awarding and posting of federal aid to a student's account. The benefit is the students and parents do not have to be redirected to another web portal, the financial aid office does not have to wait to get notification as to the status of a file and the aid administrator is in full control of the whole process.

The third party vendor Inceptia is the company we were told the state university system is contracting with to process students files selected for verification; we have not been told if C-Code processing is included. In reviewing the Inceptia website, their product is a web portal through which families submit their information to complete the verification process as well as having all communications with the students and parents.

The school is given two options from Inceptia:

Verification Gateway Full Service. Final verifications are completed by Inceptia and processed within two business days of receipt of all documents.

Verification Gateway SaaS. A software-only option, which enables the school to complete verification.

The Financial Aid Office at CCSU has leveraged the Banner system to its fullest abilities as it relates to the Verification and C-Code processing. We believe this is due to the Director of Financial Aid being considered a super user of the system and the level of Banner knowledge may not be the same at the other state schools nor the degree to which the system is used. Arguably, even if students and parents are directed to the vendor site there will still be students and parents reaching out to the Financial Aid Office to submit documents and with questions pertaining to verification, therefore not totally freeing up staff as implied by vendor.

We recommend CCSU conduct a comparative review of the process flows of Inceptia "Verification Gateway" vs Banner to identify the differences to determine the impact of such a transition of services to CCSU students and parents. At this point, the staff is up to date with no backlogs. The consultants see no improvement of service to students or parents with contracting with Inceptia for verification.

Desk Audit Conclusion:

Within this report it has been noted that the Financial Aid Office staff is very lean as it relates to NASFAA's Staffing Model recommendation but they are a very well trained group that functions well as a team. Staff appears well suited for the jobs they perform. The level in which the department uses technology to administer federal aid places the institution at a low risk of non-compliance to Title IV regulatory guidelines. Overall impression is a well-managed Financial Aid Office that provides quality customer service to the CCSU students and the university community.

FUNCTIONALITY AND UTILIZATION OF TECHNOLOGY

Observations:

The University's student information system is currently Ellucian's Banner 8, with plans to transition to the cloud in February 2018 and eventually to Banner 9. The 4 state universities will retain separate instances of Banner, while the 12 community colleges will have a single instance. As previously noted, the Financial Aid Director, Rich Bishop, who has been at Central for 15 years, is exceptionally adept in using Banner. Frequently, the term to describe someone with Mr. Bishop's level of expertise is "Super User." Central has benefitted enormously from his talent, as he has automated the financial aid processes to an exceptional degree. The IT staff has given Mr. Bishop a remarkable level of access to data, a testament to their respect for his knowledge and abilities. The IT staff reports that the Financial Aid Office requires very little support from them.

The office utilizes ImageNow for document imaging, linking, and workflow and forms required for Federal verification have been automated for online submission through the student BlueNet portal. Currently, the forms are automatically loaded to ImageNow and routed through workflow. Mr. Bishop hopes to implement a process that will load the data from the electronic forms directly into Banner.

These processes, as well as the routine and ad hoc reports Mr. Bishop can produce, has streamlined processing to the extent that student applications can be reviewed and awards produced within days of the completion of the application. As noted in the Staffing section above, the knowledge and technical skills of Mr. Bishop have provided enormous benefit to Central. However, the consultants are concerned about the lack of back-up for the Director and documentation of the processes he has implemented. While the new Associate Director, Keri Lupachino, appears to be very capable, the consensus is that she is not currently ready to fill the position of Director.

The Director of Admissions reports that he has access to some Financial Aid Banner screens (view only) but no one else in his office has access. The Bursar indicates she has limited access and would benefit from access to the Financial Aid comment screens.

Recommendations:

1. The consultants strongly recommend the hiring of a second Associate Director for technology and compliance from outside CCSU. The person should have in-depth experience with Banner and financial aid regulations. This person should eventually achieve the status of "Power User," a term that is used to describe a system user with a high level of skill but below the level of "Super User."
2. The consultants also recommend the Director develop detailed documentation of his processes with screen shots and narrative that would permit the office's continued operation in the unexpected absence of the Director.
3. The consultants recommend a review of the policy of granting access to Financial Aid screens by other campus officials. According to the Federal Student Aid Handbook, Volume 2, Chapter 7, pp. 149-151:
4. The FERPA regulations include a list of exceptions where the school may disclose personally identifiable information from the student's file without prior written consent. Several of these

allowable disclosures are of particular interest to the financial aid office, since they are likely to involve the release of financial aid records.

5. Disclosures to school officials - Some of these disclosures may be made to officials at your school or another school who have a legitimate interest in the student's records. Typically, these might be admissions records, grades, or financial aid records. Disclosure may be made to:
 - other school officials, including teachers, within the school whom the school has determined to have legitimate educational interests.

CURRENT BUSINESS PRACTICES

The consultants reviewed the overall physical structure and workflow processes of the financial aid office to determine if the office is designed to functionally create an environment to provide quality customer service and an efficient operation.

Financial Aid Policies and Procedures Manual

Observations:

CCSU has a Policy and Procedure (P&P) Manual which does not appear to have been thoroughly updated since 2006. The responsibility for creating and maintaining the P&P Manual is assigned to the Director. (The Director started the process of updating the manual using NASFAA's manual builder prior to the end of the Desktop Audit.)

The P&P Manual primarily documents policies with limited documentation of procedures and does not include screen shots or step-by-step instructions for completing procedures.

Recommendations:

6. The responsibility for annually coordinating and maintaining the P&P Manual should be assigned to an Associate Director (ideally, a new Associate Director for Technology and Compliance.) Each staff member should provide documentation of their actual processes, including screen shots.
7. Each staff member should develop desk manuals of all daily, weekly, semester and annual office procedures including all step-by-step instructions and screen shots that make it possible for all procedures to continue in the absence of the primary responsible staff member. Have staff members exchange desk manuals to see if the coworker can follow the documented steps.

Reconciliation

Observation:

Reconciliation of disbursements of student loans and Pell Grants between the Accounting and Financial Aid Office is completed each semester.

Recommendation:

8. Financial Aid and Accounting should begin monthly reconciliation of student loans and Pell.

Communication

Observations:

Communication with other offices receives mixed reviews. While some staff in other offices believe they communicate satisfactorily with Financial Aid, other staff, especially in offices that interact with Financial Aid on financial issues, express a sincere desire for improved communication and collaboration. Communication among the Financial Aid Office and all constituencies on campus (including students, staff, faculty, administrators, and executive leaders) is critical to the ongoing successful administration of federal financial aid programs at an institution. Increasing amounts of complexities in administering the federal financial aid programs may often lead to regulations that are misunderstood and viewed as bureaucratic to the general campus culture, which leads to rising levels of tension between campus partners, administrative area faculty and staff and the financial aid staff.

Specific issues regarding communication and collaboration relate to adjustments made to financial aid awards (especially reductions/R2T4) without timely or complete notification to the Bursar or the Grants Administration Office. Both of these offices have been cited in recent audits as failing to return Federal funds to G-5 within the required timeframe. The Grants Administrator indicates she maintains a “cushion” of \$10-15,000 in her Federal G-5 Accounts so that a downward adjustment to the account due to a return of financial aid funds that exceeds 3 days. (It is permissible for the institution to apply credit to students’ accounts, in essence using institutional funds, before drawing down funds through G-5 to cover the disbursements.)

With regard to automating and implementing cross checks to catch/detect/prevent errors, since the majority of the data involved in processing financial aid for CCSU students comes into the system electronically and is processed in a systematic workflow, the likelihood of errors within the Financial Aid Office is minimal. The reviewers believe the small number of audit findings related to the delivery of Title IV aid indicates the office has adequate quality control processes in place.

Coordination with the University’s Foundation did not go well during the 2017-18 award year. The Foundation purchased and implemented Academic Works (a replacement for a home-grown SDI system) to match student applicants with named endowed funds. The SDI system had limitations in its matching function but was able to load scholarship recipient data directly into the Banner Financial Aid student records. Academic Works, with a more robust matching feature, does not have the capability of transmitting data to Banner. As a result, the Foundation provided a roster of over 900 individual awards to Financial Aid for manual entry into Banner. The manual posting resulted in a significant number of errors, resulting in incorrect disbursements and extremely difficult reconciliation of the Foundation’s awards with Financial Aid.

Recommendations:

9. The consultants strongly recommend that the Director work to create a more communicative and collaborative climate with offices across campus.
10. The consultants recommend that the Grants Administrator maintain a more substantial “cushion” between the G-5 request for funds and the funds actually credited to students’ accounts. In addition, it is critical that the Financial Aid Office alert the Grants Administrator prior to substantial award reductions (primarily due to R2T4 calculations.)
11. The reviewers recommend the policies and procedures that exist to ensure quality control be documented in the updated/revised Policy and Procedure Manual recommended in our report.

Of slightly greater concern, with regard to errors, relates to processes that involve interaction with other offices. The US Department of Education provides an array of self assessments for institutions to use to assist institutions with compliance. The link to the site is:
<https://ifap.ed.gov/qahome/fsaassessment.html>

Among the specific assessments that may be helpful to CCSU are the following:

Direct Loans:

Direct Loan Activity 1: Direct Loan Reconciliation (Program Year Closeout)

Direct Loan Activity 2: Direct Loan Quality Assurance

Direct Loan Activity 4: Direct Loan Fiscal Requirements

Fiscal Management:

Fiscal Management Activity 1: **Reconciliation Worksheets**

Fiscal Management Activity 2: **General Fiscal Requirements**

Fiscal Management Activity 3: **Excess Cash**

Recommendation:

12. A mechanism to transmit Foundation scholarship award information directly into Banner should be implemented prior to the 2018-19 award cycle.

Customer Service

Observations:

The arrangement of the reception area of the Financial Aid Office does not provide for private conversations between staff and students.

All 7 students participating in the Focus Group reported exceptional satisfaction with their interactions with the Financial Aid Office. Most of the interactions were via phone, with few visits to the office required. All reported that they check their CCSU emails regularly and understood the financial aid application and disbursement processes. They were not familiar with the process for qualifying for Work Study, however.

Recommendations:

13. Consider re-structuring the reception area to ensure an adequate level of confidentiality and to decrease data entry errors due to interruptions. This can be done by using one of the empty staff offices in FA to move the two FA Assistants into a shared office space. This will create an area in the front end to move the FA Advisor from the counter and construct a partitioned work station (4 foot walls) in the space where the two FA Assistants were. This still allows the FA Advisor to oversee the work-study students.
14. Additional Customer Service training is recommended for the front counter Student Workers as to the type of information that can be shared in an open office environment and when to refer student/parents to a staff member.
15. The consultants commend the Financial Aid Office on its exceptional customer service. This factor is significantly influenced by the automation within the office that permits such rapid

service. The consultants recommend better communication about the process for being awarded Federal Work Study. (See next section on FWS administration.)

Federal Work Study (FWS) Awarding

Observations:

The current Policy and Procedure Manual indicates the following regarding “Selection of Students” (page 35 of P&P):

The policy regarding dissemination of FWS funds is to award monies to as many students as possible. This is accomplished by awarding funds to needy students on a priority basis until funds are exhausted.

The Financial Aid website under Types of Aid contains the following:

The Federal Work Study Program provides funds to employ students who qualify for financial aid. Students will be considered for an award by submitting their FAFSA by the priority deadline and demonstrating eligibility. Students awarded Work-Study may apply for part-time jobs throughout a variety of departments on campus.

Failure to secure a position after the start of the semester would result in cancellation of this award.

However, it appears that students must inquire about the FWS program in order to be offered funds. Students can find a reference to student jobs through the Career Success Center, through word of mouth, or from potential employers on campus. A follow-up response from the Director indicates this statement is incorrect and that FWS offers are included in initial award notifications. The reviewers suggest that the awarding procedures be reviewed to determine they meet the following requirement:

From the Federal Student Aid Handbook, Volume 3, Chapter 6, page 3-140:

AWARDING FEDERAL WORK-STUDY (FWS)

Unlike the other two Campus-Based Programs, the FWS Program does not require that priority be given to students who have exceptional financial need. However, you must make FWS jobs reasonably available, to the extent of available funds, to all eligible students. Your selection procedures must be in writing, uniformly applied, and kept in your school’s files. There are no specific award limits for FWS earnings, other than the requirement that the amount of the FWS award not exceed the student’s financial need. For a full discussion of packaging FWS with other aid, see Chapter 7 in this volume. When deciding on an appropriate FWS award for a student, you should consider the student’s academic work load and any other factors that might affect the hours that a student could work each week.

It is unclear whether job descriptions exist for FWS positions or how wage rates are determined within the 3 classes of wages discussed with Payroll. According to the *Federal Student Aid Handbook, Volume 6, Chapter 2, p. 6-45*:

Job descriptions for all FWS positions should be a part of the control procedures included in your school's policies and procedures manual. A written job description will help you ensure that the position is one that qualifies under the FWS program regulations. In addition, a written job description provides students with the information they need to determine whether they qualify for the job, whether the job is related to their educational or career objectives, and whether the job is of interest to them. Moreover, by considering the rates of pay applicable to the position, the qualifications for each pay level, and the qualifications of a student applicant, a financial aid administrator can determine the hours a student will need to work in order to earn the funds specified in the student's FWS award. Finally, a written job description establishes a record to which all parties can refer. In addition, a written job description can help avoid disagreements and adjudication and provide a reference in such cases.

Further, regarding wage rates, according to the *Federal Student Aid Handbook, Volume 6, Chapter 2, p. 6-47*:

A student's need places a limit on the total FWS earnings permissible but has no bearing on his or her wage rate. It is not acceptable to base the wage rate on need or on any other factor not related to the student's skills or job description. If a student's skill level depends on his or her academic advancement, the school may pay a student on that basis. For example, a junior or third-year lab student may be paid a higher rate than a sophomore or second-year lab student. However, in most cases, students performing jobs comparable to those of other employees should be paid comparable wages, whether the other employees are students at different class levels or are regular employees.

Recommendations:

16. The consultants recommend that the Financial Aid Office review its procedure for awarding FWS. Ideally, FWS offers are included in the packaging process, based on the students' indication of interest in work-study in Question 31 of the FAFSA. The University's FWS allocation is currently approximately \$300,000; traditionally institutions offer at least 200% of their anticipated authorization.
17. The consultants recommend the University evaluate its policy on job descriptions for FWS positions and determination of wages paid for each position.

Institutional Scholarship Awarding

Observation:

A recent proposal was sent to President Toro regarding revisions to the policy for awarding merit based scholarships. Under the current policy, some students have been allowed to "stack" institutional merit scholarships, meaning the students might receive more than one merit scholarship. The new policy proposes to make it clear to entering students that specific merit scholarships cannot be stacked. In addition, the Admissions Office has been allocated additional merit funds to award to students as they are admitted. (Previously, limited funds were awarded by Admissions upon the students' admission, with other awards being made later, which has a negative impact on recruiting.) The new proposal includes the following Proposed Footnote on Admission Acceptance Letter Merit Awards:

Congratulations on receiving a Merit Based Admissions Scholarship Award in your Acceptance Letter. Students are eligible to receive either the Merit-based Admissions

Scholarship Award(s) offered in your Acceptance Letter, or one of the following: the Johnny Floyd Scholarship, an Honors Scholarship, full Athletic Scholarship or a CCSU Foundation full tuition scholarship sponsored by a corporate sponsor. If you are awarded the Johnny Floyd Scholarship, an Honors Scholarship, full Athletic Scholarship or a CCSU Foundation full tuition scholarship sponsored by a corporate sponsor after you have been awarded a Merit Based Admissions Scholarship in your Acceptance Letter, the University will assume that you have elected to retain only the scholarship with the highest value, unless you notify the University otherwise within 15 days of receipt of the second scholarship.

Recommendation:

18. The consultants strongly support this proposal and recommend the University and the Admissions Office engage in predictive modeling to target merit awards based on institutional enrollment goals. (See Appendix B regarding Enrollment Management Models and Predictive Modeling.)

ADMINISTRATIVE CAPABILITY AND ADHERENCE TO REGULATIONS

Department of Education Provisional Status

The Program Participation Agreement issued April 2, 2017, by the U. S. Department of Education includes the following statement:

Deficiencies in Administrative Capability

Recent audits and/or a recent program review of the institution's performance of its responsibilities as a participant in the Title IV, HEA programs have disclosed **serious, repeated or systemic deficiencies** [*emphasis added*] that directly relate to the regulatory elements identified in 34 CFR § 667.16.

Observations:

A review of the Single Audit Matrix, prepared in May 2017 but the Chief Financial Officer, the consultants did not find systemic compliance errors that have not been addressed.

Further, the reviewer did research to determine what comprises "repeated deficiencies" and found the following:

The Department of Education no longer publishes its Audit Guide (last published in 2001.) Further, the ED Blue Book is described as:

The Blue Book provides guidance on accounting, recordkeeping, managing, and reporting by postsecondary educational institutions that participate in federal student aid programs.

The Blue Book ceased publication in 2013. For current guidance, refer to the Federal Student Aid Handbook.

From a recent Department of Education presentation entitled "Top 10 Audit and Program Review Findings,"

(<https://ifap.ed.gov/presentations/attachments/22Top10AuditandProgramReviewFindingsV1.pdf>) a slide includes the following wording:

Repeat Finding – Failure to take corrective action

Applicable Federal Regulations cited in the presentation are 34 C.F.R. §§ 668.16 (Administrative Capability) and 668.174 (Past Performance):

https://www.ecfr.gov/cgi-bin/text-idx?SID=aa8129193ffab12005f95815e0a8b18&mc=true&node=se34.3.668_116&rgn=div8

https://www.ecfr.gov/cgi-bin/text-idx?SID=aa8129193ffab12005f95815e0a8b18&mc=true&node=se34.3.668_1174&rgn=div8

From 668.174:

- (a) *Past performance of an institution.* An institution is not financially responsible if the institution—
- (4) Has failed to resolve satisfactorily any compliance problems identified in audit or program review reports based upon a final decision of the Secretary issued pursuant to subpart G or H of this part.

In the opinion of the reviewer, and based on the above information, a “repeat finding” implies a finding that is the same as a prior finding, with no corrective action taken as indicated in the prior audit response. In other words, the SAME corrective action would be needed to address the “repeat finding.” The findings that might be considered “repeat” at CCSU require DIFFERENT corrective actions. For further information, please review the links to both CFR citations above.

In a discussion with the Registrar, he believes findings related to reporting to NSLDS are of three types:

- Social Security Number accuracy due to the University’s use of the Common Application, which does not collect SSNs.
- University policies and procedures for classifying student status, specifically university (vs. ED) Leave of Absence and Post-Bac Teacher Certification students classified as Withdrawn instead of Graduated.
- Enrollment reporting difficulties related to the National Student Clearinghouse.

The Registrar believes that all problems with reporting have been addressed that can be addressed. (Clearinghouse issues may continue to develop over which the University has no control until the issues surface.)

Findings related to Cash Management generally are related to holding excess cash. This issue was addressed in the Communication section, Recommendation #8. One instance occurred due to a deposit to an incorrect account. The Director of Accounting reports that deposits are now being monitored.

Conclusion regarding Provisional Status:

The consultants did not identify any systemic weaknesses in the departments we examined nor do we believe there are significant numbers of repeat findings. All staff in the involved departments are dedicated to complying with all Federal regulations and maintain up-to-date regulatory knowledge. Unfortunately, occasional mistakes will occur due to human error. Evidence of mistakes resulting from inadequate system processes or training needs should be addressed to prevent future instances.

Satisfactory Academic Progress Policy

Observation:

Satisfactory Academic Progress (SAP) is reviewed following the production of grades after each semester. Students failing to meet SAP are placed on warning without appeal for the subsequent semester. Students who fail to achieve SAP after their warning semesters are notified that they are ineligible for further financial aid and given the opportunity to appeal by submitting an appeal form and documentation of mitigating circumstances to the Financial Aid Office. Financial Aid forwards the appeals to the Registrar's Office for review and determination of outcome. The Registrar indicated he reviews all appeals and makes the decision regarding the students' aid eligibility. If an Academic Plan is required, the Registrar develops the Plan and may include a referral to the Learning Center for meetings with academic coaches.

While Federal regulations governing SAP do not require a Financial Aid representative to sit on a Financial Aid SAP committee there are numerous regulatory requirements surrounding SAP that the Financial Aid administration is responsible for. At the recent Federal Student Aid Conference it was "strongly recommended" by the Department of Education that at least one member of the committee be from Financial Aid and be someone who is aware of the regulations regarding Financial Aid SAP appeal requirements which can be very different from Academic appeal requirements and documentation.

Recommendation:

19. The consultants, addition to the U.S. Department of Education, very strongly recommend creating a SAP Appeal Committee that includes at least one senior representative from the Financial Aid Office.

CONCLUSION

The Office of Financial Aid and other related departments at Central Connecticut State University exist to support the mission of the college:

Central Connecticut State University is a community of learners dedicated to teaching and scholarship that emphasizes development and application of knowledge and ideas through research and outreach activities, and prepares students to be thoughtful, responsible and successful citizens. As a comprehensive public university, we provide broad access to quality degree programs at the baccalaureate, master's, and doctoral levels.

In supporting the mission, all departments must examine their policies, practices and structure to determine how it can best support the mission and serve the University's students while maintaining a strong commitment to compliance. The Financial Aid Office currently utilizes Banner to its fullest extent and the consultants would support the sharing of the wealth of knowledge of the Director with others on campus.

SUMMARY OF RECOMMENDATIONS

Functionality and Utilization of Technology

1. The consultants strongly recommend the hiring of a second Associate Director for technology and compliance from outside CCSU. The person should have in-depth experience with Banner and financial aid regulations. This person should eventually achieve the status of “Power User,” a term that is used to describe a system user with a high level of skill but below the level of “Super User.”
2. The consultants also recommend the Director develop detailed documentation of his processes with screen shots and narrative that would permit the office’s continued operation in the unexpected absence of the Director.
3. The consultants recommend a review of the policy of granting access to Financial Aid screens by other campus officials. According to the *Federal Student Aid Handbook, Volume 2, Chapter 7, pp. 149-151*:
4. The FERPA regulations include a list of exceptions where the school may disclose personally identifiable information from the student’s file without prior written consent. Several of these allowable disclosures are of particular interest to the financial aid office, since they are likely to involve the release of financial aid records.
5. Disclosures to school officials - Some of these disclosures may be made to officials at your school or another school who have a legitimate interest in the student’s records. Typically, these might be admissions records, grades, or financial aid records. Disclosure may be made to:
 - other school officials, including teachers, within the school whom the school has determined to have legitimate educational interests.

Current Business Practices

Financial Aid Policies and Procedures Manual

6. The responsibility for annually coordinating and maintaining the P&P Manual should be assigned to an Associate Director (ideally, a new Associate Director for Technology and Compliance.) Each staff member should provide documentation of their actual processes, including screen shots.
7. Each staff member should develop desk manuals of all daily, weekly, semester and annual office procedures including all step-by-step instructions and screen shots that make it possible for all procedures to continue in the absence of the primary responsible staff member. Have staff members exchange desk manuals to see if the coworker can follow the documented steps.

Reconciliation

8. Financial Aid and Accounting should begin monthly reconciliation of student loans and Pell.

Communication

9. The consultants strongly recommend that the Director work to create a more communicative and collaborative climate with offices across campus.
10. The consultants recommend that the Grants Administrator maintain a more substantial “cushion” between the G-5 request for funds and the funds actually credited to students’ accounts. In addition, it is critical that the Financial Aid Office alert the Grants Administrator prior to substantial award reductions (primarily due to R2T4 calculations.)
11. The reviewers recommend the policies and procedures that exist to ensure quality control be documented in the updated/revised Policy and Procedure Manual recommended in our report.

Of slightly greater concern, with regard to errors, relates to processes that involve interaction with other offices. The US Department of Education provides an array of self-assessments for institutions to use to assist institutions with compliance. The link to the site is:

<https://ifap.ed.gov/qahome/fsaassessment.html>

Among the specific assessments that may be helpful to CCSU are the following:

Direct Loans:

Direct Loan Activity 1: Direct Loan Reconciliation (Program Year Closeout)

Direct Loan Activity 2: Direct Loan Quality Assurance

Direct Loan Activity 4: Direct Loan Fiscal Requirements

Fiscal Management:

Fiscal Management Activity 1: **Reconciliation Worksheets**

Fiscal Management Activity 2: **General Fiscal Requirements**

Fiscal Management Activity 3: **Excess Cash**

12. A mechanism to transmit Foundation scholarship award information directly into Banner should be implemented prior to the 2018-19 award cycle.

Customer Service

13. Consider re-structuring the reception area to ensure an adequate level of confidentiality and to decrease data entry errors due to interruptions. This can be done by using one of the empty staff offices in FA to move the two FA Assistants into a shared office space. This will create an area in the front end to move the FA Advisor from the counter and construct a partitioned work station (4 foot walls) in the space where the two FA Assistants were. This still allows the FA Advisor to oversee the work-study students.
14. Additional Customer Service training is recommended for the front counter Student Workers as to the type of information that can be shared in an open office environment and when to refer student/parents to a staff member.
15. The consultants commend the Financial Aid Office on its exceptional customer service. This factor is significantly influenced by the automation within the office that permits such rapid

service. The consultants recommend better communication about the process for being awarded Federal Work Study. (See next section on FWS administration.)

Federal Work Study (FWS) Awarding

16. The consultants recommend that the Financial Aid Office review its procedure for awarding FWS. Ideally, FWS offers are included in the packaging process, based on the students' indication of interest in work-study in Question 31 of the FAFSA. The University's FWS allocation is currently approximately \$300,000; traditionally institutions offer at least 200% of their anticipated authorization.
17. The consultants recommend the University evaluate its policy on job descriptions for FWS positions and determination of wages paid for each position.

Institutional Scholarship Awarding

18. The consultants strongly support this proposal and recommend the University and the Admissions Office engage in predictive modeling to target merit awards based on institutional enrollment goals. (See Appendix B regarding Enrollment Management Models and Predictive Modeling.)

Administrative Capability and Adherence to Regulations

Satisfactory Academic Progress Policy

19. The consultants, addition to the U. S. Department of Education, very strongly recommend creating a SAP Appeal Committee that includes at least one senior representative from the Financial Aid Office.

**APPENDIX A – NASFAA STAFFING MODEL DATA NASFAA STAFFING
PREDICTOR MODEL FOR CCSU USING 2016-17 DATA**

* Institution Type	Public, 4-year and/or above ▼
* NASFAA Regional Affiliation	EASFAA ▼
* Total Number of Undergraduate Students	11213
* Total Number of Graduate/Professional Students	03067
* Total Number of Financial Aid Applicants	08018
* Total Number of Financial Aid Recipients	08554
* Which best describes your financial aid office environment?	Centralized Administration, tra ▼
* Does your institution have a one-stop shop?	No ▼

PERMANENT, UNDUPLICATED FTE EMPLOYEES

Student Accounts / Cashier / Bursar	<input type="text" value="0.0"/>
Admissions	<input type="text" value="0.0"/>
Registrar	<input type="text" value="0.0"/>
Career Services / Student Employment Office	<input type="text" value="0.0"/>
Scholarship Office (if separate from Financial Aid)	<input type="text" value="0.0"/>
Loan Collection	<input type="text" value="1"/>
Veterans Services Office	<input type="text" value="01"/>
Institutional Advancement / Fund Raising Office	<input type="text" value="0.5"/>
Accounting / Comptroller	<input type="text" value="0.0"/>
Gear Up	<input type="text" value="0.0"/>
TRIO	<input type="text" value="0.0"/>
Academic Advising	<input type="text" value="0.0"/>
Athletics	<input type="text" value="0.0"/>

Staff Size Benchmarking

Your school compares to other institutions of your type, size, and location as follows. Please note that these results do not necessarily benchmark your optimal staffing level. The results are based on a survey of financial aid offices, and if the surveyed offices were understaffed, this normative model may calculate an average that is less than the actual number required to provide an optimal staffing level.

Average FTE for similar institutions: 15.86

APPENDIX B – ENROLLMENT MANAGEMENT MODEL AND PREDICTIVE MODELING

The intent of our campus visit did not include a review of the organizational model in which the Student Support divisions of CCSU function. We were asked to provide our thoughts as to the model of Enrollment Management in higher education. The following is an overview of this model and some of its benefits. We are not advocating using this model at CCSU but we understand the institution is taking into consideration implementing an Enrollment Management model.

True enrollment management is a concept and a process. "In the traditional sense, enrollment management involves marketing, recruitment, pricing, financial aid, financing, student employment, academic registration, housing, career development and placement, minority student affairs, international student affairs, research, and market research. In the non-traditional sense, it includes many functions that cross office and divisional lines. Recruitment, retention, and student success is a job for everyone.

For effective enrollment management to occur, critical elements must be present. While not exhaustive, the following list contains elements that are necessary for successful enrollment management: leadership, teamwork, strategic planning, comprehensive programming, knowledge about the competition, critical timing, accurate, secure and available data along with appropriate support systems, clear and workable strategies, and the necessary resources."

Orehovec and Ingold, 2011

Historical:

"Enrollment management implies an assertive approach to ensuring the steady supply of qualified students required to maintain institutional vitality."

Kemerer, Baldrige and Green, 1982

"Effective enrollment management not only requires the marketing of the institution and selection of students but also involves more broadly based and all-encompassing activities."

Hossler, 1984

"Organizational system supporting the integration of activities associated with the overall enrollment process. Enrollment management has emerged as a comprehensive and integrated approach of related functions to enhance and improve the recruitment, retention and graduation of students."

Maguire, late 80s

Predictive Modeling

The term enrollment management refers to the ability of institutions of higher education to exert more systematic influence over the number and characteristics of new students, as well as influence the persistence of students to continue their enrollment from the time of their matriculation to their graduation.

A key tool of enrollment management is Predictive Modeling, a systematic set of activities designed to enable educational institutions to exert more influence over their student enrollments.

Predictive modeling uses statistical analysis of past behavior to simulate future results. For campuses, a predictive model assesses the likelihood that a student will enroll at your institution by the degree to which the student shares the characteristics of the current student body.

The history behind who enrolled at your school tells a powerful story about who you can expect to enroll in future terms. You can find characteristics that influence enrollment and also weigh the amount of their influence on enrollment, then apply that model against each student in your pool to see how much they fit the profile of a student who did enroll. (This can be refined and strengthened even further by appending additional socioeconomic and demographic data to the model.) Your prospective students receive a qualifying score that helps you quickly gauge their enrollment likelihood.

A predictive model not only can enhance your primary market recruitment, but also identify how your institution can effectively and deliberately target students and populations in your secondary and tertiary markets—leading to increased enrollment numbers via a more efficient recruitment process. These models inform and affect not only communication strategies, but also territory management and travel, providing enrollment managers and counselors with valuable model scoring information by region and high school that assists in understanding where your institution has the greatest potential for future and/or continued growth. Such a tool, therefore, takes travel—notoriously a low return on investment venture—and improves this return significantly by placing statistical data and modeling at the center of territory management.

Using predictive modeling can be highly beneficial in developing specific stages of the enrollment funnel.

Four ways predictive modeling makes your funnel more manageable.

Benefit 1: Qualifying lists before purchasing student names

Benefit 2: Prioritizing your inquiry pool

Benefit 3: Distinguish “soft applicants” from those you should pursue in your applicant pool

Benefit 4: Optimize communications with students in your admit pool

Results: Deploying resources more strategically to reap better enrollment yields

The Most Common Types of Predictive Models

Search Model - search name to enroll

Inquiry Model - inquiry to enroll (aka lead scoring model when used in performance-based marketing)

Applicant Model - application to enroll

Yield Model - admit to enroll

Econometric Model - financial aid modeling, usually for admit to enroll

Retention Model - enroll to first-year retention

EnrollmentBuilder.com and RuffalNL.com

CONSULTANT PROFILES

Judy Schneider

Senior Consultant

Judy Schneider has over 30 years of student financial aid experience in both two-year and four-year public and four-year private institutions. Judy came to FAS in 2009. As a senior consultant, she supports financial aid offices across the country. She provides *Interim Staffing, Consulting and Assessment* services to improve business processes, strengthen compliance efforts and enhance student satisfaction.

Her previous experience includes tenure with the National Association of Student Financial Aid Administrators, where she was manager of NASFAA's Professional Excellence Programs.

For 18 years prior to joining the National Association of Student Financial Aid Administrators (NASFAA), Judy was assistant vice president and director of financial aid at The University of Texas at Arlington.

She is experienced with several financial aid software systems, including Ellucian (SunGard) Banner, Oracle PeopleSoft, Ellucian (Datatel) Colleague, College Board PowerFAIDS and the U.S. Department of Education's suite of applications and website for administering Federal Student Aid.

Judy served as NASFAA's National Chair from 1998 to 1999 and has been active on many of the association's committees. She was President and Treasurer of both the Southwest Association of Student Financial Aid Administrators (SWASFAA) and the Texas Association of Student Financial Aid Administrators (TASFAA). She has made countless presentations at NASFAA, SWASFAA, TASFAA, and other state conferences over the years.

Judy received her Bachelors of Science and Masters in Business Administration from Texas Christian University.

Michael Shields

Consultant

Michael Shields has over 30 years of student financial aid experience in two-year and four-year public, for-profit private and four-year private institutions. Michael came to FAS in 2017. As a consultant, he supports financial aid offices across the country. He provides *Interim Staffing, Consulting* and *Assessment* services to improve business processes and enhance student satisfaction. He has a strong knowledge of federal regulations and regulatory guidelines to assist clients in strengthening their compliance efforts.

His most recent tenure was with Antonelli College, where he was Vice President of Student Finance, overseeing the Financial Aid, Student Accounts, Registrar and Default Management areas.

Prior to joining Antonelli College, Michael was Executive Director of Financial Aid at Kaplan University, managing Financial Aid Training, the Office of the Ombudsman and the Regulatory and Compliance teams. He has served as a senior aid administrator for the majority of his professional career in higher education.

He is experienced with several financial aid software systems, including Ellucian (SunGard) Banner, Ellucian (Datatel) Colleague, College Board PowerFAIDS and the U.S. Department of Education's suite of applications and website for administering Federal Student Aid.

Michael has been active in the financial aid professional associations at national, regional and state levels. He has served on a variety of different committees and made numerous presentations at the Midwest Association of Student Financial Aid Administrators (MASFAA) and the Illinois Association of Student Financial Aid Administrators (ILASFAA). His reputation as a trainer and presenter earned Michael invitations to speak at many other state conferences over the years.

Michael received his Bachelors of Science from Illinois State University and Masters in Administration in Higher Education from DePaul University in Chicago Illinois.

FINANCIAL AID SERVICES

Financial Aid Services (FAS) was established in 1991 to provide consulting, processing, on-site staffing and other customized services to assist colleges and universities in improving operational efficiency, student satisfaction and regulatory compliance.

Financial Aid Services is a privately held corporation employing 52 permanent staff and a similar number of part-time staff. With its headquarters in Atlanta, Georgia, FAS offices comprise three primary areas of focus – *Consulting, Processing Services* and *Interim Staffing*. FAS professional staff are interchangeable between these service areas. Project teams are composed according to skill set and the specific requirements of the client. FAS seeks the best match in assembling personnel to meet the goals of the engagement. Each team has a client services manager who also serves as a liaison to the institution.

Collectively, the FAS staff has nearly 1,100 years of experience in financial aid from a variety of campuses including: Bucknell University, Clark Atlanta University, Community College of Allegheny County, Dillard University, Emory University, George Fox University, George Washington University, Georgia Institute of Technology, Georgia State University, Illinois State University, Knox College, Loyola University Chicago, Northeast State Community College, Northwestern University, Oklahoma State University, Texas Christian University, University of California Santa Barbara, University of Chicago, University of Florida, University of Idaho, University of St. Thomas, and University of Texas.

The professionals at Financial Aid Services bring unparalleled expertise in program management. All are former financial aid administrators whose innovations led to notable improvements in student satisfaction, enrollment, cash flow and regulatory compliance. They consult with institutions throughout the country, provide advanced, full-service processing support for financial aid offices, and are frequently invited to present at regional and national conferences.

Our consultants and client services managers work closely with the U.S. Department of Education to assist institutions responding to program reviews and in rebuilding financial aid offices. Several institutions have utilized FAS to address audit issues with the U. S. Department of Education, significantly reducing the amount of liability incurred. The U.S. Department of Education has given FAS an exceptional performance rating on the files submitted for “reimbursement.” After partnering with Financial Aid Services, a number of institutions have been relieved of the cash flow restrictions associated with the reimbursement funding method.

A large university drew upon FAS’ expertise to reconstruct its financial aid delivery after a difficult software implementation resulted in a series of sizable challenges and negative consequences. The results of that partnership were highly successful. They included awards being available weeks earlier than in prior years, improved student satisfaction, and double the amount of disburseable aid being available to students by the start of classes.

Throughout FAS’ 25-year history, many of our over 1,100 clients have expanded their relationships with us to include multiple services. Some of those colleges and universities have incorporated FAS’ service into their institutional strategic plans and consider our professionals to be integral parts of their successes.