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ABOUT NASFAA

The National Association of Student Financial Aid Administrators (NASFAA) is a nonprofit membership organization that represents more than 20,000 financial aid professionals at nearly 3,000 colleges, universities, and career schools across the country. NASFAA member institutions serve nine out of every ten undergraduates in the U.S. Based in Washington, DC; NASFAA is the only national association with a primary focus on student aid legislation, regulatory analysis, and training for financial aid administrators. For more information, visit www.nasfaa.org.

ABOUT THE STANDARDS OF EXCELLENCE REVIEW PROGRAM

NASFAA’s Standards of Excellence Review Program offers reviews of postsecondary education institutions by qualified and experienced financial aid professionals. It provides a professional and consistent means of assessing an institution’s financial aid program, and a reliable measure of confidence to institutional leaders. NASFAA’s peer review program examines financial aid operations and delivery of funds to students; compliance with Title IV statutes and regulations; computer systems, automation, and technology usage; human resources and facilities; and customer service issues.

This program also identifies and highlights innovations in the delivery of financial aid, recognizes institutional strengths, and collects data to establish national benchmarks for successful administration of financial aid programs at all types of colleges and universities. In essence, the Standards of Excellence Review Program is about strengthening and enhancing the efforts of colleges and universities to administer and deliver financial aid on their campuses.
ABOUT THIS REPORT

This report represents a summary of the data collected before and during the on-site review. The document is divided as follows:

1. Methodology—briefly details the activities and procedures of each phase of the review.
2. Executive Summary—provides a brief overview of the peer review team’s findings.
3. Strengths—describe the good practices and institutional efforts to achieve excellence in student services related to application procedures identified.
4. Compliance Exceptions—cite violations of federal statutes, regulations, or current guidance.
5. Recommendations—offer guidance to help improve current procedures, diminish instances of noncompliance with federal regulations, or enhance service to students.
6. Interview Summaries—provide a compilation of the feedback received from the individuals interviewed before and during the site visit.
7. Employee Assessment Summary—summarizes the responses to the diagnostic assessment of the office of student financial aid and scholarship staff. It helps to identify areas where staff needs additional training.
8. Office of student financial aid and scholarship appraisal Summary—compiles the written comments from financial aid employees on selected issues, such as financial aid operations, student service, and financial aid delivery to students.
9. Conclusion—offers the peer review team’s overall opinion of financial aid administration and identifies major issues to be immediately addressed.
10. Resources—a list of NASFAA management tools referenced throughout the report and how to access them.
11. Peer Review Team Members—provides a listing of the Standards of Excellence peer review team members who conducted the review.
METHODOLOGY

1. Demographic data about the institution as well as information provided by institutional staff was used to match peer reviewers with institutional needs.

2. A preliminary review of documents provided by the institution (called a desk audit) was used to assess institutional strengths and weaknesses and identified issues unique to the institution.

3. Peer reviewers conducted the on-site review using assessment tools developed by NASFAA, including federal Title IV guidelines, review worksheets, staff assessment documents, and other reference materials. Peer reviewers assessed Title IV compliance; identified institutional good practices; evaluated human resources and facilities; reviewed institutional operations and financial aid delivery; examined systems, automation, and technology utilization; and performed a preliminary analysis of customer service at the Institution.

4. Admission, financial aid, and disbursement records were reviewed; staff and administrators were interviewed; financial aid staff members were given diagnostic assessments; computer technology was evaluated; and other institutional documents were examined for regulatory compliance.

5. The most recently completed award year was reviewed. In this report, the 2012–13 academic year was reviewed, and all references contained herein are applicable to that award year, unless otherwise noted.

6. The review was conducted in accordance with generally accepted standards. These standards require the peer review team to plan and perform the review to obtain reasonable data regarding the institution’s delivery of Title IV assistance. The review included a limited examination of evidence supporting claims and disclosures made by the institution. NASFAA believes the review provides a reasonable basis for the opinion rendered in this report. However, because of inherent limitations in any review errors, irregularities, or areas of noncompliance may nevertheless exist and may not be detected.

7. Compliance exceptions, recommendations, and strengths are identified in the review report. Suggested actions to address compliance exceptions and the rationale for each recommendation are also included. In addition, the final report includes management tools and training materials to help the institution establish more compliant and student-oriented financial aid services. The management tools and materials are provided at no additional cost to the institution.
EXECUTIVE SUMMARY

During the period of March 24 - 27, 2014, a NASFAA Standards of Excellence (SOE) Peer Review team visited the University of Nevada Reno (UNR) by invitation to provide an assessment of the office of student financial aid and scholarships (OSFAS) operations and identify any compliance concerns needing management attention.

During the three and a half day visit, the peer review team interviewed office staff, key business office personnel, senior university administrator, personnel in admissions, student records staff, and campus safety staff. Additionally, the peer review team examined all facets of the financial aid operation including software systems and technology; program operations policies and practices; publications and website information; financial aid awarding and disbursement; cash management; coordination of federal, state, and institutional financial aid sources; records and reporting; and customer service. The team also reviewed a sample of student files for accuracy and compliance with federal financial aid requirements.

UNR is a large public university that participates in all the Title IV programs and offers undergraduate, graduate and professional degrees. The OSFAS director has been at UNR for 4 years and has over 28 years of financial aid experience at multiple institutions. Roughly three years ago the OSFAS went through a PeopleSoft conversion which resulted in some difficult times for both staff and students seeking financial assistance. The primary goal of the SOE review was to affirm the University is moving in a positive direction and to identify any compliance exceptions and inefficiencies in the financial aid process. Another important focus was an examination of the OSFAS’s organizational structure and staff size in comparison with other universities of similar size and scope.

The OSFAS has experienced more than usual staff turnover over the years, with nine staff leaving within the period of one year. Therefore, an immediate need is to maintain stable staffing. A number of identified compliance exceptions were the result of a lack of written policies and procedures and an insufficient number of staff. The peer review team fully understands the University budget constraints and does not make recommendations for additional staff lightly. However, based upon the number and type of compliance exceptions outlined in this report, it would not be unreasonable to add a compliance officer position. Many large public institutions have a staff member whose main responsibility is updating policies and procedures and ensuring the University is in compliance.

The compliance errors that require immediate attention deal with institutional eligibility (compliance finding numbers 4 and 5), application processing and file review (compliance finding number 11), cash management and disbursement (compliance findings 16, 17 and 19), and student consumer information (compliance finding number 25). UNR should address these areas at the earliest opportunity to close this window of exposure.

In addition, the peer review team identified a number of other compliance issues that are serious but many can be remedied fairly quickly. In fact, OSFAS staff already had ideas how to correct several of the errors before the team departed. The areas that need immediate attention are:
Institutional Eligibility

Institutional eligibility issues can potentially affect the University’s participation in Title IV programs. UNR could not produce a signed Program Participation Agreement (PPA). The Eligibility Certification and Approval Report (ECAR) did not list all the University’s third party servicers.

Application Processing and File Review

ED requires institutions to verify the accuracy of a certain percentage of the Free Application for Federal Student Aid (FAFSA’s) applications. ED provides parameters for the various data elements to be verified, including who should be included in the household and number in college. However, OSFAS staff has added additional criteria above and beyond ED guidance. UNR is a Quality Assurance (QA) school which does allow for some leeway in setting their verification policies and procedures, but holding families to a higher standard in these two categories is not one of them. This has resulted in some students receiving smaller Federal Pell Grants than which they should have actually received.

Cash Management and Disbursement

Federal Pell Grant recipients, who are due a credit balance, must receive their funds no later than seven days following the start of the term. Additionally, they must have the opportunity to use their refunds to purchase books at a vendor of their choosing. Currently as the result of UNR requiring all students to complete an enrollment verification form prior to disbursement, not all Federal Pell Grant recipients receive their refunds in a timely fashion. Secondly, the University is using current year financial aid to pay prior year charges of greater than $200. The regulations only allow institutions to pay up to $200 of prior year charges with current year financial aid.

Student Consumer Information

There are many regulations for student consumer information with which the University must comply. It is a task that must be done with attention to detail and the work reviewed no less than yearly to ensure all items are being disclosed. Ideally a staff person within the appropriate office should be dedicated to this task to ensure all student consumer information is made available and communications are compliant.
STRENGTHS

The peer review team identified the following items as strengths at the University of Nevada Reno (UNR). The Standards of Excellence Review Program defines strengths as practices at an institution that exceed minimum regulations or requirements. Usually, strengths enhance student service and/or the overall Title IV program operations at an institution.

Institutional Eligibility

1. **Drug Prevention Policy**

   The University has a very strong drug prevention and treatment policy that partners the school with the court system to ensure that any student entering the court system due to a drug or alcohol related infraction will receive treatment and support at the University. UNR also has extensive programming including work with the Greek system and within the residence halls.

2. **Financial Aid Appeal Board**

   The Financial Aid Appeal Board has been well thought out and is chaired by two Senior Financial Aid Advisors. The board consists of three additional financial aid staff and representatives from university housing, academic advising, the disabilities resource center, etc. Such action pulls the university together as a team in approaching satisfactory academic progress (SAP) appeals which is a very positive thing.

Application Processing and File Review

3. **Individual C-Flag Messages**

   Many schools provide a generic message instructing students to check their Free Application for Federal Student Aid (FAFSA) for C-flag messages. The office of student financial aid and scholarships (OSFAS) posts individual messages for each of the comments relating to C-flag codes. Doing so provides very specific and useful information to students.

Cash Management and Disbursement

4. **Private Loan Entrance Counseling**

   Students who want to borrow a private student loan for the first time are required to complete entrance counseling prior to receipt of the funds. Providing counseling is a great tool to ensure students understand the terms and conditions of the loans and will hopefully curb the student’s overall indebtedness.
Return of Title IV Funds (R2T4)

5. **R2T4 Internal Worksheet**

UNR’s R2T4 coordinator is well versed in the R2T4 regulations and has created a number of tools to assist with ensuring compliance. Specifically, she created an R2T4 checklist which outlines each of the steps that must be completed in the R2T4 process. The checklist is very thorough and easy to understand.

Technology Utilization, Systems Processing, and Functionality

6. **Hardware Technology**

OSFAS seems very well-equipped with regard to hardware technology. Modern equipment and high-end monitors seem to permeate the building.

7. **Posting Items to PeopleSoft**

The OSFAS has access to a custom process called Query Based Update (QBU) developed by an outside consultant. This product allows the office to update various fields in PeopleSoft in a robust, yet simple way. QBU is a unique process not available at many schools.

Student Consumer Information

8. **Campus Security Authority Training**

Every two years, employees are required to complete online security training. The training is meant to remind staff of their responsibility to report to the proper authorities any suspicious activities viewed or learned through other methods.

Family Educational Rights and Privacy Act (FERPA)

9. **Protection of Data**

Protection of personally identifiable information is well done. Every employee with computing access is assigned a PeopleSoft role and the role defines what information the employee may access. The department or division head must approve any additional access requests. Then the request is vetted through another approval process. Security of data is taken very seriously.

Human Resources and Facilities

10. **OSFAS Facilities**
Recently the OSFAS facilities were remodeled and are top notch. The reception area is welcoming for students and parents and the workspace is modern and roomy. The space contains a scanning room, a lunch room, a conference room, and a great workspace for the many students which they employ.

11. Security Access

Access to the OSFAS employee workspace is restricted to only those with key card access. This significant security feature ensures employees feel comfortable in their work environment.

Customer Service

12. Outreach

The OSFAS has made it a priority for staff to provide on and off-campus outreach to educate others about financial aid. To help with admission efforts, the OSFAS staff offers in-person counseling sessions four days each month in Las Vegas during the spring and summer.
COMPLIANCE EXCEPTIONS

The peer review team identified the following items as compliance exceptions at the University of Nevada Reno (UNR). The Standards of Excellence Review Program defines compliance exceptions as violations of federal laws, regulations, or regulatory guidance. Failure to address these compliance exceptions in a timely manner could lead to systemic problems in the administration of Title IV programs. If left unaddressed, the U.S. Department of Education (ED) could levy financial liabilities and/or termination of the institution’s eligibility to participate in one or more Title IV programs. The UNR is strongly urged to take immediate action to correct the exceptions noted.

Institutional Eligibility

1. Exception: Incomplete Consortium Agreement Form

The University’s current consortium agreement form does not include the following information:

- The student’s tuition, fees, and room and board costs at each school;
- The student’s enrollment status at each school;
- The school that will grant the degree or certificate; and
- The procedures for calculating awards, disbursing aid, monitoring satisfactory progress and other student eligibility requirements.

**Suggested Corrective Action:**

The University must revise the consortium agreement to include all the required elements.

2. Exception: Private Education Loan Applicant Self-Certification Form Not Available

The University does not provide the private education loan applicant self-certification form for students applying for private education loans.

**Suggested Corrective Action:**

The OSFAS should make the self-certification form available to students in a written or electronic format; the electronic version should be posted to their website. In addition, the OSFAS should provide students with information required to complete the form.

3. Exception: Student Loan Code of Conduct Not Available and Not Disclosed Annually

The University has not published a student loan code of conduct, nor does it annually notify employees of the policy.
**Suggested Corrective Action:**

The University must develop a student loan code of conduct. The code of conduct must be published and provided annually to notify all employees of their responsibility to follow the policy.

4. **Exception: Third-Party Servicers Not Reported on the Eligibility and Certification Approval Report (ECAR)**

The University has not listed its third party servicers, ECSI, COAST, Conserve, General Revenue and William and Fudge on the ECAR.

**Suggested Corrective Action:**

The University should promptly report all third-party services by updating Section J of its *Electronic Application for Approval to Participate in Federal Student Aid Programs* at [http://www.eligcert.ed.gov/](http://www.eligcert.ed.gov/).

5. **Exception: Unsigned Program Participation Agreement (PPA)**

The University could not produce a signed copy of the PPA.

**Suggested Corrective Action:**

The University should locate the signed PPA. If it is unable to do so, it should request a copy from its ED regional office. Note the University is currently in the process of completing the recertification process and soon should be receiving an updated signed PPA. A copy signed by both ED and the University should be maintained in the Office of Student Financial Aid and Scholarships (OSFAS) and the president’s office.

**Administrative Capability**

6. **Exception: Degree Completion Not Monitored**

The University does not have a mechanism to identify students who have met their undergraduate degree requirements, but have not yet formally graduated.

**Suggested Corrective Action:**

The University must conduct degree audits to identify and code in PeopleSoft those students who have completed all the requirements for a baccalaureate degree. Student records must be coded in such a way to indicate a student is no longer degree-seeking and, therefore, no longer eligible for the applicable Title IV funds once they have met all degree requirements.
7. Exception: Incomplete Satisfactory Academic Progress (SAP) Policy

The University’s SAP policy does not address the following items:

- How SAP is measured for students enrolled in the School of Medicine;
- The effect of English as a Second Language (ESL) and remedial courses on progress; and
- A statement informing students that neither paying for classes on their own nor sitting out for an enrollment period is sufficient for students to re-establish Title IV aid eligibility.

Suggested Corrective Action:

With the assistance of the NASFAA Policies & Procedures Tools and NASFAA Monograph 25: Satisfactory Academic Progress as guides, the University must update its SAP policy to address all the required elements.

8. Exception: Incomplete Verification Policies and Procedures

The University’s verification policies and procedures fail to address the following:

- Procedures for referring suspected fraud; and
- Procedures to identify all eligible applicants for whom modification and waiving of some statutory and regulatory provisions applies under the Higher Education Relief Opportunities for Students (HEROES) Act of 2003.

Suggested Corrective Action:

Using the NASFAA Policies & Procedures Tools as a guide, the verification policies and procedures must be updated to address the missing information.

9. Exception: Not Verifying High School Completion

The University does not have a policy and procedure to evaluate the validity of a student’s high school completion if the school or ED has reason to believe a student does not have a valid high school diploma or it was not obtained from an entity that provides secondary education.

Suggested Corrective Action:

The University must determine the most appropriate office to review such information and create policies and procedures to document the high school diploma validity.

Application Processing and File Review
10. Exception: **Not Processing Award for Those Granted a Tax Extension**

The OSFAS does not process an award or disburse funds to students whose application has been selected for verification, even though the student and parent can provide the appropriate information showing they have filed an extension with the Internal Revenue Service (IRS).

**Suggested Corrective Action:**

The OSFAS should update their verification policies and procedures accordingly so students receive their award and Title IV funds are disbursed in a timely fashion.

11. Exception: **Using Incorrect Household Size and Number in College**

The OSFAS does not follow ED guidance defining who should be included in the household size and number in college on the Free Application for Federal Student Aid (FAFSA). The OSFAS has created its own criteria based upon age and tax exemptions.

**Suggested Corrective Action:**

Using the NASFAA Policies & Procedures Tools as a guide, the verification policies and procedures should be updated accordingly so UNR students are treated in a manner compliant with Federal Student Aid (FSA) requirements.

**Packaging and Awarding**

12. Exception: **Federal Loan Fees Excluded for Direct Loan Borrowers**

The OSFAS does not include Federal Direct Loan fees in the student borrowers’ cost of attendance (COA).

**Suggested Corrective Action:**

Using the NASFAA Monograph 24: *Developing the Cost of Attendance* as a guide, the OSFAS must establish an appropriate amount of Federal Direct Loan fees. This can be achieved by:

- Calculating the actual loan fee charged to the individual student borrower and add that fee amount to the COA; or
• Calculating an average level of borrowing for students receiving federal loans, determine the fees derived from that average, and incorporate those average loan fees into the COA for each student awarded a loan.

Staff must ensure the loan fee is included only in students’ COA for those that actually borrow the appropriate loans. The inclusion of loan fees in a student’s COA who do not borrow could result in an overaward.

13. Exception: Incorrect Packaging of AmeriCorps Benefits

The OSFAS incorrectly uses AmeriCorps benefits as estimated financial assistance (EFA) when determining eligibility for Federal Direct Subsidized Loans.

**Suggested Corrective Action:**

The OSFA must develop a policy and procedure to exclude AmeriCorps benefits as EFA when calculating eligibility for a Federal Direct Subsidized Loan.

14. Exception: Lack Supporting Documentation for COA

The OSFAS was unable to provide documentation how it derives its COA amounts.

**Suggested Corrective Action:**

Using the NASFAA Monograph #24 *Developing the Cost of Attendance* as a guide, the University must develop and implement policies and procedures to review and revise COA amounts on an annual basis to more accurately reflect the educational expenses its students incur.

15. Exception: Not Adjusting Budgets and EFC’s Correctly For Summer Term Enrollment

The OSFAS does not have a two month summer budget for students who only attend during two of the summer mini-sessions. Additionally, they are not using an 11 month EFC for these students. Currently, the OSFAS has 1 and 3 month budgets and are using either a 10 or 12 month expected family contribution (EFC).

**Suggested Corrective Action:**

Using the NASFAA Monograph 24: *Developing the Cost of Attendance* as a guide, the OSFAS needs to develop policies and procedures to ensure students summer budgets and EFC’s are reflective of the number of months enrolled.
Cash Management and Disbursement

16. Exception: Book Buy Opt Out Not Available

UNR does not provide an option for an eligible student to opt out or decline to participate in the process the school provides for Federal Pell Grant recipients to obtain or purchase required books and supplies by the seventh day of the payment period.

Suggested Corrective Action:

UNR must provide all financial aid recipients with the opportunity to purchase books and supplies wherever they choose. As consumers, students have the right to purchase books at the lowest cost possible which may not always be the campus book store. UNR may, but is not required to, offer another way to purchase books and supplies as long as that method does not delay a refund of student’s credit balance.

17. Exception: Delay in Providing Pell Grant Recipients Option to Obtain or Purchase Books

UNR has added an additional step each term prior to disbursement requiring all students to complete a financial aid enrollment form, which requires certification of their enrollment. As a result, they are withholding disbursement and thus, the ability for some Federal Pell Grant recipients to obtain or purchase required books and supplies beyond the seventh day of the payment period.

Suggested Corrective Action:

The UNR must provide a method by which students who are eligible for a Federal Pell Grant are able to obtain or purchase books and supplies prior to the seventh day of the payment period.

18. Exception: Title IV Accounts Not Labeled Properly

UNR does not properly label Title IV funds accounts as federal funds.

Suggested Corrective Action:

UNR must identify the accounts containing FSA funds as such.

19. Exception: Using Current Year Title IV Funds to Pay Prior Year Balances

The University does not ensure current year funds are used to cover only prior year balances of $200 or less. Students are allowed to use any amount of current year funds to cover a prior year
balance as long as they sign the consent form.

**Suggested Corrective Action:**

Using the NASFAA Policies & Procedures Tools as a guide, UNR needs to update their cash management authorization policies and procedures to ensure current year funds do not pay greater than $200 in prior year charges.

**Return of Title IV Funds (R2T4)**

20. Exception: Withdrawal Date Not Reported to ED

| Student Identifier: 8000082706 |

UNR did not report this student’s correct unofficial withdrawal date to ED via the National Student Loan Data System (NSLDS) or the National Student Clearinghouse.

**Suggested Corrective Action:**

Using NASFAA’s CORE training materials Module 12: Return of Title IV Funds as a guide, the University must revise its policies and procedures for reporting a student’s withdrawal date to ED via NSLDS or the National Student Clearinghouse. The withdrawal date must be the same date used to calculate the student’s R2T4 calculations. Staff reported this exception has been addressed for the 2013-14 academic year.

**Financial Aid Program Administration**

21. Exception: Federal Work-Study (FWS) Funds Inappropriately Disbursed

UNR pays FWS wages through the end of May, which is roughly three weeks after the conclusion of the spring term. Students who graduate and do not plan on attending during the next period of enrollment are inappropriately being paid FWS wages during a period of nonattendance.

**Suggested Corrective Action:**

Using the NASFAA Policies & Procedures Tools as a guide, UNR needs to update its FWS policies and procedures regarding payments made following the conclusion of a payment period. Generally most institutions will cease paying FWS funds during the payroll period that ends prior to the conclusion of the spring term.
22. Exception: **Inappropriate Payment of FWS Funds For Community Service Positions**

The University is paying FWS funds to a select number of students while they are student teaching. However, students are generally not paid for such experiences and should not be paid just to comply with spending a portion of their allocation for community service positions.

**Suggested Corrective Action:**

The University must cease the current practice unless it is willing to pay all students for similar experiences. UNR should identify other opportunities to meet their community service requirement.

23. Exception: **No Exit Counseling Follow-up For Direct Loan Borrowers**

The OSFAS makes an effort to provide loan exit counseling to students prior to graduation by sending emails. However, the OSFAS does not identify students who did not complete the online process.

**Suggested Corrective Action:**

The OSFAS should collaborate with the information technology (IT) staff to identify students who do not complete the online exit counseling. In these cases, the OSFAS should send either the print or PDF version of *Exit Counseling Guide for Federal Student Loan Borrowers* via mail or email within 30 days of learning that a borrower did not complete electronic exit counseling.

**Financial Aid Reconciliation and Reporting**

24. Exception: **Lack of Monthly Reconciliation**

The University does not consistently reconcile all federal funds on a monthly basis.

**Suggested Corrective Action:**

Using the NASFAA *Policies & Procedures Tools* template as a guide, the University must establish policies and procedures for monthly reconciliation of its federal accounts. The University should use ED’s *Reconciliation Year-End Worksheet* ([www.ifap.ed.gov](http://www.ifap.ed.gov)). The worksheet ties together all of the reconciliation points – financial aid records, business office records, Common Origination and Disbursement (COD) System, G5 drawdowns, Fiscal Operations Report and Application to Participate (FISAP), and general ledger totals.

**Student Consumer Information**
25. Exception: **Annual Disclosure of All Information Lacking**

The University does not provide all of the required annual disclosure notices to students. The peer reviewers were unable to verify the following disclosures were being provided on an annual basis:

- General disclosures for enrolled or prospective students;
- The Equity in Athletics Data (EADA); and
- Drug and alcohol abuse prevention information.

**Suggested Corrective Action:**

The University must develop policies and procedures to annually provide students with the appropriate disclosures. For assistance, UNR should refer to *NASFAA Self-Evaluation Guide* and ED’s Consumer Information Assessment at [http://ifap.ed.gov/gahome/qaassessments/consumerinformation.html](http://ifap.ed.gov/gahome/qaassessments/consumerinformation.html).

26. Exception: **Incorrectly Identifying Federal Programs**

The University does not use the word “Federal” in all instances when describing the various Title IV Programs on its award letters, publications and on the web site.

**Suggested Corrective Action:**

The University should review all web and printed materials to ensure the correct name is used when identifying the various Title IV programs.

27. Exception: **Student Diversity of Federal Pell Grant Recipients Not Disclosed**

The University does not publish the student diversity of its full-time Federal Pell Grant recipients.

**Suggested Corrective Action:**

The University must assign the appropriate office with the task of making this information available to prospective and enrolled students.

**Family Educational Rights and Privacy Act (FERPA)**

28. Exception: **Incomplete Annual FERPA Notice**

The annual FERPA notice does not contain the following information:
• Procedure for requesting amendment of records;
• The definition of school officials with legitimate education interests;
• The criteria used to determine who is a school official; and
• A definition of a legitimate educational interest.

**Suggested Corrective Action:**

The University should update the annual notice to students to include the missing information. Additionally, the University should update all printed materials and its website to include this information.
RECOMMENDATIONS

The Standards of Excellence Review Program defines recommendations as non-regulatory guidance offered to enhance financial aid delivery. NASFAA’s Standards of Excellence Peer Review Team recommends the following to the University of Nevada Reno (UNR):

Institutional Eligibility

1. Recommendation: Remove Consortium Agreement Form From the Web

The Office of Student Financial Aid and Scholarships (OSFAS) should remove the consortium agreement form from its website. This form is only for those students in programs where they are required by their UNR academic program to enroll in classes at another institution.

Rationale:

The consortium agreement is not appropriate for all students and is only used when students have been advised by their academic program to seek a portion of their enrollment elsewhere. Students who are simply choosing to take classes at another school are submitting the form hoping to receive aid. However, the form is not used for this purpose and should only be available when the alternate enrollment is required.

Many large public institutions do not participate in consortium agreements except in the case of study abroad. ED does not require institutions to enter into such agreements; this is left up to the institution. In such arrangements, UNR is accepting some additional liability and is relying on the institution with which they have entered the agreement to monitor the student’s enrollment and report back to UNR.

Administrative Capability

2. Recommendation: Additional Office of Student Financial Aid and Scholarship (OSFAS) Staff

The University should provide OSFAS with resources to hire one additional staff. Based upon the number of compliance exceptions noted and the work needed to correct them, it would not be unreasonable to add a compliance person. The position should focus on compliance issues which includes annually updating the OSFAS policies and procedures.

Rationale:

NASFAA has a staffing model which compares like institutions in terms of size and structure from across the country and specifically the region. Based upon this analysis, financial aid staff sizes at similar type University’s ranged from 25.2 to 12.4, with the average being 18.8 full-time staff. It should be noted that this model does have its limitations as not all financial aid operations are alike. For example, the OSFAS at UNR does much more outreach than like institutions and has also
chosen to add some additional processes to reduce receivables that normally are not the responsibility of the financial aid staff. Likewise, some financial aid operations also handle the Veteran Affairs paperwork and all the student employment transactions, which the UNR financial aid office does not.

OSFAS relies heavily on student workers to assist with tasks such as answering the phone, scanning, reviewing documents for completeness, and assisting students at the reception area. In order to stay afloat, the OSFAS relies much more on student workers than the peer reviewers have witnessed at many other institutions. In addition, lack of adequate staffing could be a compliance exception; see below:

3. **Recommendation: Conduct Regular Financial Aid Staff Meetings**

The OSFAS staff should conduct regular staff meetings. Although the office reserves time every Friday morning for staff to meet, it is common for the meetings to be cancelled to allow staff time to catchup on other tasks. Staff has expressed an interest in meeting more regularly. The OSFAS director should assign a staff member to create an agenda of topics staff want to cover.

**Rationale:**

To ensure effective Title IV aid administration and communication the OSFAS staff should meet at least bi-weekly. Meeting regularly will allow the staff to address current issues and plan for upcoming peak activities. This will enable staff to have a better understanding of policies and procedures.

4. **Recommendation: Cross-Train OSFAS Staff**

The OSFAS staff should be crossed-trained to ensure the office continues to operate smoothly when others are unavailable or out of the office. Cross-training should cover institutional protocols, PeopleSoft functionality, and all aspects of the proper delivery of Title IV aid.

**Rationale:**

Cross-training would allow for multiple people to complete certain processes and also improve customer service. This could potentially help with the normal bottlenecks that happen during peak times and the overall workflow within the office. Cross training would ensure no interruptions of financial aid processing when key people are away from the office.


The OSFAS should update their policies and procedures for Title IV processing operations. Priority should be given to those topics most likely to be scrutinized under a federal program review, including but not limited to:
• Satisfactory academic progress (SAP);
• Return of Title IV funds (R2T4);
• Verification and file review;
• Cost of attendance (COA);
• Packaging and awarding; and
• Professional Judgment (PJ).

Staff should use the most current NASFAA’s Polices & Procedures Tools as a template to detail the various topics. Once the policy and procedure manual is developed, the OSFAS should put it an intranet so all University employees involved in Title IV operations can view it.

Rationale:

As noted throughout this report the lack of current and detailed Title IV policies and procedures has resulted in compliance exceptions. Written policies and procedures are essential in training staff and to ensure consistency of application for all employees involved in ensuring the University maintains institutional eligibility for participation in federal aid programs.

6. Recommendation: Develop a OSFAS Operational Calendar

The OSFAS should develop a comprehensive 12-month operational calendar. The calendar should include:

• Due dates for federal, state, and institutional reports;
• Dates for updating system reports/programs; and
• When various student communications are sent.

The calendar should also list which staff member is responsible for coordinating or completing various tasks.

Rationale:

Having an operational calendar is one way to stay organized and to be pro-active. Staff can review and update the calendar during staff meetings so everyone knows what tasks need to be completed daily and in the future. The use of an operations calendar also holds people accountable as they can no longer say they forgot, or they thought someone else was completing a certain task.

7. Recommendation: Modify Satisfactory Academic Progress (SAP) Processes

The peer reviewers have the following recommendations related to the SAP process:

• Improve the existing language to better explain how it will notify a student of any SAP evaluation impacting eligibility;
• The semester end review of academic plans should be completed by the academic area; and

• The OSFAS should notify students earlier to provide students the opportunity to change enrollment decisions and potentially complete their programs within the 150 percent time frame.

Currently the University reviews SAP at the end of each semester, which amounts to three times each academic year. Per the regulations, institutions are required to only review once per academic year. The University must weigh the added work of reviewing SAP three times a year versus the benefit of using a warning status for one semester. This is really an institutional decision based upon what they feel is best for their specific student population.

**Rationale:**

Communicating timely information to students about the University SAP policy is extremely important. Currently students are notified they are approaching their maximum time frame in the middle of the semester in which the student will hit the 150 percent. By this time, it is often too late for the student to effectively change behavior, leaving the student with no option but to appeal. Secondly, the policy should simply state all communications are sent via email rather than being vague on the method of communication. Third, OSFAS staff are not academic advisors and, therefore, maybe ill-equipped to review student’s academic progress as stipulated in the academic plans.

8. Recommendation: *Provide Outside Training Opportunities*

The OSFAS staff should participate in training opportunities such as Web training and outside conferences. The U.S. Department of Education (ED) and NASFAA offer a variety of on-line training opportunities to include NASFAA University, NASFAA Webinars, or ED’s [http://ifap.ed.gov/ifap/fsacoach.jsp](http://ifap.ed.gov/ifap/fsacoach.jsp) web-based training modules. There are conferences and workshops offered annually by PeopleSoft, national, regional, and state financial aid associations, as well as ED, so staff can stay abreast of the latest changes.

**Rationale**

Web-based training modules allow staff to access training at their convenience. Attending financial aid conferences allows staff to network with other financial aid administrators. A well trained staff is essential to the University maintaining administrative capability.

9. Recommendation: *Provide the OSFAS Additional Funds for Training*

The OSFAS budget should be increased specifically to allow more staff to attend regional and national conferences and workshops.

**Rationale**
The OSFAS budget does not allow for generally more than one or two staff members to attend training outside of the immediate area in a year. Allowing multiple staff to attend national and regional conferences on an annual basis would expand the knowledge base of the OSFAS, thus not being so dependent on one or two staff members. A well-trained financial aid staff will likely result in less compliance exceptions, which would be a worthwhile investment.

10. Recommendation: Review OSFAS Organizational Chart

A number of newer entry level staff report directly to the director. The OSFAS’s organizational structure should be modified so only the associate or assistant director’s report directly to the director. Newer staff should report to an associate or assistant director.

Rationale:

New staff members generally have more questions and need much more day-to-day mentoring. Due to the many demands on a director at a larger public institution, it is very difficult to be available as often as needed for newer staff.


The University should use NASFAA’s Self-Evaluation Guide to conduct Title IV compliance assessments (at least biennially) for all departments involved in ensuring Title IV compliance. The NASFAA Self-Study Guides are a good resource for even the most experienced financial aid administrator.

Rationale:

The Self-Evaluation Guide is a good tool to:

- Evaluate the effectiveness of all Title IV operations;
- Enhance compliance awareness;
- Reduce risk;
- Improve staff knowledge; and
- Identify areas for additional training.

NASFAA’s Self-Study Guides are designed for the independent learner; each Self-Study Guide includes multiple lessons with a variety of exercises to reinforce each lesson.

Application Processing and File Review

12. Recommendation: Consolidate Forms
Staff should review quantity of forms students are required to submit. In addition, the office should consider consolidating forms pertaining to a specific category. The following forms could be combined:

- The budget revision and the child care budget increase request;
- The two SAP appeal forms; and
- The special circumstances and reevaluation request forms.

**Rationale:**

Consolidating forms would streamline the financial aid process making less confusing for the student and reduce the OSFAS’s workload.

13. Recommendation: **Do Not Wait for Corrections Before Packaging**

After correcting Institutional Student Information Records (ISIR) PeopleSoft recalculates the expected family contribution (EFC). Rather than waiting for the Central Processor System (CPS) to send a corrected EFC, the OSFAS should package the student based on the PeopleSoft EFC.

**Rationale:**

Packaging the student on the PeopleSoft EFC will speed up the process while eliminating extra steps for the financial aid staff. Students will receive their award letter sooner which is good customer service.

14. Recommendation: **Streamline Verification Process**

The OSFAS staff should review the entire verification process with the intent of streamlining it to make it easier and more efficient for students and staff. The OSFAS needs to encourage students to use the FAFSA IRS Data Retrieval Transfer (DRT), rather than requiring them to submit all their tax documents. Staff currently ignores when students and parents complete the DRT and are still requiring them to submit their tax returns as they want to check additional items not contained in the DRT. ED has clearly stated that if an individual completes the DRT, this is acceptable tax information and institutions do not need to check these data elements unless they believe there is conflicting information.

**Rationale:**

Developing a streamlined, compliant process offers much opportunity for staff being able to focus on other pressing operational and customer service tasks. Most QA institutions actually use this designation as an opportunity to target their efforts towards certain student populations they view as greater risks in making errors on the FAFSA. In many cases this results in schools actually doing a little less work than required by the regulations, which is perfectly acceptable based upon their QA designation.
Packaging and Awarding

15. Recommendation: **Eliminate Funding Level Change Request Form**

The OSFAS should eliminate the funding level change request form which informs students that they may not drop courses without first submitting this form to OSFAS.

**Rationale:**

The OSFAS has no authority over students dropping classes. Rather than the OSFAS requesting the student complete a form, the appropriate office should administer the drop process. The peer reviewers understand this form was a process developed to decrease accounts receivable, but it appears requesting this form has encouraged a lot of additional OSFAS traffic and forms to be submitted at a time when some staff are saying the office is understaffed.

Cash Management and Disbursement

16. Recommendation: **Encourage Direct Deposit**

Currently a majority of refunds are being provided via a paper check. UNR should encourage students to sign up for direct deposit for receiving credit balances.

**Rationale:**

Producing and mailing a check is more time consuming and expensive than providing student refunds via direct deposit.

17. Recommendation: **Eliminate Financial Aid Enrollment Form**

In the summer, the OSFAS sends a communication to all students with a FAFSA requiring them to submit a financial aid enrollment form. The form asks many questions for which the University already has answer. Staff needs to ask themselves, “What is the simplest, most efficient, and most courteous way that we can best serve the largest percentage of students?” If they truly ask this question as they review their processes, they would not ask all students to confirm their enrollment when they know that most students are full time. Additionally, the OSFAS is already holding disbursements in cases when there is not a match in the between number of hours enrolled and the number of hours on which the award was based. So this form seems redundant and unnecessary for a large percentage of the students. The OSFAS should eliminate the financial aid enrollment form or at the very least reevaluate the population required to complete the form.

**Rationale:**

Many of the questions on this form do not relate to the average student.
Return of Title IV Funds (R2T4)

18. Recommendation: Update R2T4 Policies

UNR should update its R2T4 policy as does not currently address modular programs (i.e. wintermester and summer terms). It is unclear the dates used for the start and end of the modular terms. The peer reviewers felt that in practice, the person responsible for R2T4 was addressing modules and was using start and end dates as provided for the entire campus. However, if one just reads the policies and procedures, it is unclear how the University would calculate an R2T4 for a student enrolled in modular programs.

Rationale:

As the R2T4 policy reads, it is confusing and auditors may not understand it. In addition, the OSFAS staff must understand it so they can explain it to students and families.

Financial Aid Program Administration

19. Recommendation: Address Federal Perkins Loan Default Rate

When the peer reviewers asked multiple staff about the measures they were taking to reduce the Federal Perkins Loan default rate, they seemed unaware the University’s default rate was close to 19 percent. The University should work closely with their third-party services to lower their default rate.

Rationale:

UNR should address this issue sooner rather than later as they are getting close to be required by ED to have a default management plan. The University could possibly lose eligibility to participate in the Federal Perkins Loan Program if the default rate continues to rise.

Note: The Federal Perkins Loan Program is set to sunset on September 30, 2015 unless Congress takes specific action to extend by September 30, 2014.

20. Recommendation: Be More Accommodating With Special Circumstance Requests

Professional judgment (PJ) authority as noted in HEA Sec. 479A (a) is an option for financial aid administrators to help families with unusual circumstances that affect their ability to pay for college. The OSFAS will not exercise PJ for a family due to reduced income until they are able to provide the current year tax forms. For example, if the Free Application for Federal Student Aid (FAFSA) asked for 2012 tax information and the family indicates their 2013 income will be greatly reduced due to both parents losing their jobs in March of 2013, the OSFAS would require the family to provide their final 2013 tax form which may not occur until February or March of 2014. The
OSFAS should allow for families to submit forms to document projected 2013 income based upon check stubs, unemployment statements, etc. to address the situation as soon as possible.

Rationale:

Students may not be able to enroll without additional assistance due to their family's change in income. Most schools would address the issue as soon as possible and not drag out the process.


The OSFAS should standardize FSEOG award amounts for the full year at $1,000 ($500 per term).

Rationale:

FSEOG funds are very limited and there are many more eligible applicants than funds provided. Currently awards seem to range from $3,000 to $1,000 for the year. By making all awards at $1,000 for the academic year, more students will be eligible to receive some funds. Additionally, by making the award amount the same for all, it provides much more consistency and eliminates the need to have to explain treating students differently.

22. Recommendation: Revise Federal Work-Study (FWS) Eligibility Criteria

The OSFAS literature says it does not award FWS funds to students who do not maintain a 2.0 grade point average (GPA). The FWS criteria should be revised to reflect the actual criteria used to determine eligibility for FWS funds, i.e. meeting SAP.

Rationale:

The current language used is incorrect and is confusing.

23. Recommendation: Update Teacher Education Assistance for College and Higher Education (TEACH) Aggregate Limit

The OSFAS should configure the Federal TEACH Grant aggregate limit screen in PeopleSoft so the lifetime limit is automatically captured.

Rationale:

A staff member manually checks the lifetime limit for each TEACH recipient. PeopleSoft could easily be programed to handle this duty; freeing staff for other duties. Any time a manual process is automated, the chance of human error is eliminated.

Financial Aid Reconciliation and Reporting

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24. Recommendation: Increase Campus-Based Funding Level Request

When completing the Fiscal Operations and Application to Participate (FISAP), the University has the opportunity to request additional FWS and FSEOG funding. The University should take the number of Federal Pell Grants recipient’s times the maximum award amounts for each program when determining the amount requested.

Rationale:

Currently the University is requesting $900,000 funding for each program. There is no assurance that by requesting more the University will receive additional funding. However, the amount being requested is very low based upon the percentage of students receiving Federal Pell Grants and the UNR students could use much more.

Technology Utilization, Systems Processing, and Functionality

25. Recommendation: Archived Data Snapshots Should Be Taken

The OSFAS should capture snapshots of data from its current system at key points throughout the years. Data should include the number of ISIR’s received, number of packages completed, and the number of verification completed or pending.

Rationale:

Archived data snapshots are critical in making key policy and process decisions. On numerous occasions it was mentioned that forms were established to meet certain needs. However, it was sometimes difficult to see the data upon which these decisions were made. Data snapshots can also be critical in establishing new aid programs or awarding strategies.

26. Recommendation: Update Information on The Web

The Academic Competitive Grants (ACG) and the Science and Mathematics Access to Retain Talent (SMART) Grant programs are still referenced with the R2T4 process, even though those two programs have been eliminated. Additionally, there is a link for the loan authorization form, which is dated for the 2012-13 year but should be labeled 2013-14. The web pages contain a good amount of information, but it would be helpful for graduate and professional students if a page was created just for their needs, rather than making them search through the entire site. The OSFAS should:

- Review the information being provided periodically to ensure it is accurate and up to date;
- Review the links being provided to ensure they are working properly; and
- Create a web page specific to graduate and professional financial aid programs.
Rationale

Students and parents are not going to use the University’s website to research their questions if they learn the information is outdated and incomplete. Having current and complete Web information may reduce phone calls and office visits, freeing staff for other duties.

27. Recommendation: Increase Use of Imaging System

The OSFAS uses its imaging system only as an archive of the information after it has been processed. Instead, scanning should be conducted on the front-end of the process and then use the images in the verification process. A procedure should be developed as part of the scanning process to verify the scanned image is accurate, legible and a complete copy of the original document that, when printed, is approximately the same size as the original document.

Rationale:

Reviewing scanned documents is a more efficient use of the imaging system and a more effective way to process documents.

28. Recommendation: Implement a Reporting Tool

UNR is exploring the use of a data warehouse solution which should be put in place as soon as possible. In the interim, the University should implement a robust and user-friendly reporting tool. The PeopleSoft Query tool is not an ideal reporting solution.

Rationale:

The OSFAS should be able to access data and run reports easily. Such action will allow the office to be more efficient.

Student Consumer Information

29. Recommendation: Create Website for Consumer Information

UNR should create a central location for all student consumer information to be listed. Most information is provided, but it is very difficult to find in a timely manner. The University should use the NASFAA’s Self-Evaluation Guide and the ED Consumer Information Assessment for references to ensure all information is provided.

Rationale:

By having a link to a central location where all the required consumer information is provided, students and staff can access the information more easily. Providing this information at one location also is a good way to easily demonstrate compliance with the regulations.
Customer Service

30. Recommendation: Conduct Student Service Survey

The OSFAS should conduct an annual student service survey.

Rationale:

Student service surveys can be of key value to obtain information about students’ perceptions of the OSFAS. Also, an annual survey will provide student feedback of how the office has done in streamlining financial aid processing and providing good customer service. A survey will permit the office to target those areas most in need. The office has chosen to engage students in certain manual processes that require active steps on the part of students. A survey would measure whether students believe these steps provide valuable service or unnecessary steps in the process.

31. Recommendation: Involve More Staff in Outreach

The OSFAS places a great emphasis on staff outreach on and off campus. All staff should take an active role and be expected to assist with such activities throughout the year.

Rationale:

It appears the director is doing more outreach activities than other staff. While the director should take the lead in certain events, other staff should assist with some outreach events so the director does not always have to represent the office.
INTERVIEW SUMMARIES

The following represents a summary of the feedback received from the individual or individuals interviewed at the University of Nevada, Reno (UNR).

**Administrative Supervisor (Associate Vice President, Enrollment Services) Interview**

**Knowledgeable and Qualified Staff**

The financial aid director is knowledgeable and has done much since his arrival. Feels the rest of the staff is a good combination of more experienced and newer staff and everyone works well together. She feels the office is in a much better position today than it was four years ago.

**Financial Aid Office Concerns**

There has been a good amount of turnover in staff, so always a concern when you have multiple people leave in a short time span. However, this has enabled the office to hire some staff with new ideas, but it will take some time to get everyone trained and up to speed. She held the Office of Student Financial Aid and Scholarships (OSFAS) harmless with the deep budget cuts that have occurred in the last five years as she knows the importance of having an adequately sized and qualified staff.

**Service to Students and the Institution**

The OSFAS has made great strides in the last few years in communicating with students. Service in most cases appears to be timely and the staff seems to work well together and understand the University’s service philosophy. She pointed to the start of the fall 2013 term that the lines were very small and did not hear any concerns from students, thus was evidence of the hard work staff had done throughout the summer to be proactive in processing student files.

**Areas of Focus for Review**

While there are no known compliance issues, the University would like an assessment of both current compliance and risks for future compliance.

**Desired Outcome of Review**

The peer review team will identify any compliance exceptions and how to resolve them. The team will provide recommendations on improving financial aid delivery thus enhancing student service.

**General Observations**
She is interested in learning best practices and how the University compares to other similar type institutions from across the country. Feels doing a good job, but would like affirmation and open to new ideas.
Supervisory Staff (Director and Assistant Directors) Interviews

Desired Outcome of Review

The individuals mentioned they are understaffed and are always being reactive and do not have much time to be proactive. So they would like to get an idea on staffing level and organization structure of the office compared to other similar type institutions. Additionally, they would like an assessment of current and future compliance risks and how to resolve them. The staff also would welcome ideas on streamlining processes and enhancing the student service experience.

Understanding of Duties and Expectations

They generally feel the staff has a good understanding of what is expected of them. Staff work very hard to avoid student complaints and are not afraid to modify processes if multiple concerns are expressed on the same issue. Staff is not tied to the concept that we must do it one way as we have always done it that way, are open to new fresh innovative ideas.

Communication

In general, the managers work well together and respect each other professionally. It was repeatedly said the entire staff is open to helping one another whenever needed. Communications with offices around campus seems adequate, but there is always room for improvement and educating people on the financial aid processes. Feel some people on and off campus do not understand the many regulations that dictate the daily functions of the financial aid operations.

Current Needs

The office must get all financial aid staff up to speed and trained. There are some training opportunities in the near future being held in Reno which will allow for a good number of staff to take part in these activities. If training is not local, the current office budget does not allow for off-campus training opportunities. Training is a big concern as takes multiple years to get a new staff member up to speed on the numerous regulations and tasks with which they need to be comfortable to do their jobs.

Service to Students

Everyone agrees the office serves students well and believe the majority of students would agree. Due to the lack of sufficient resources for all students and the numerous regulations, the financial aid staff knows they cannot make everyone happy. Some students express frustration not due to the service they received, but because they did not receive as much financial assistance as they felt they deserve.
Remaining Office of Student Financial Aid and Scholarship (OSFAS) Staff Interviews

Desired Outcome of Review

At first the financial aid staff was not provided much information on the nature of the review so unsure of the reasons behind requesting. This group feels they work very hard and are getting burnt out and would like some recognition of all they do well. They understand the current financial limitations (it’s been over five years with no raises, annual furloughs and increased costs for other benefits), but feel the University could show their appreciation to staff in other ways not costing money. The group has a genuine interest in learning about any compliance exceptions, ways to streamline processes, and suggestions on how to offer better service to students.

Understanding of Duties and Expectations

The staff believed they generally have a good understanding of what is expected of them, just not sure if those expectations are realistic given current resources. Staff expressed the three main goals are the following:

- No complaints;
- No lines; and
- No delays.

The staff feels that during peak processing times at the beginning of the terms with the amount of inquires (phone, email, and walk-ins) delays are impossible to avoid. The group expressed how much they rely on student employees to assist with many tasks, but it has gotten to the point where even some student workers are stressed about work.

Communication

The staff expressed an interest in having more regular staff meeting. However, they do not want to meet for the sake of meeting, if they meet they want to discuss substantive issues. The staff feels meetings are very helpful in communicating to all current problems and resolutions of the problems. They feel meetings are very helpful in keeping everyone current and on the same page. If unable to meet in a given week, staff expressed that a weekly email update of pertinent items would suffice.

Current Needs

The staff expressed a number of pressing needs including more staff, more training opportunities and updated written policies and procedures.

Service to Students
The group feels overall student service is good. The staff feels occasionally students and other campus offices misunderstand that saying “no” means bad customer service. The group expressed the summer when they were converting to PeopleSoft three years ago was very rough for everyone. As a result students who had dealings with the OSFAS at that time may not have forgotten this experience. Staff believes newer students would generally give positive reviews because of the very good customer service they receive and students recognize the “helping atmosphere.”

Other Comments

The following are some additional comments mentioned during the interview process with this particular group of staff members:

- Staff expressed the lack of office privacy.
- Critical PeopleSoft fixes are not always loaded in a timely fashion, thus they are not able to start financial aid processing in a timely manner.
- The OSFAS still performs a number of processes manually. This includes state grants awarding, one term awards, etc.
- Students are unable to find financial aid web pages, as there are no direct links from the University homepage.
- Staff strengths are verification accuracy, outreach activities, and communications with students.
- Admissions office communication is good as a number of current staff used to work in admissions as students
- Staff does not have much interaction with most other campus offices except the cashier’s office.
- One weakness is the speed in reviewing forms which is a result of really scrutinizing every document submitted.
Overall Observations on Interviews

Summary of overall observations:

Results from all of the interviews were remarkably consistent. Virtually all staff at every level identified the following:

- More financial aid staff is needed;
- More training is needed at every level;
- Need to improve and streamline some tasks; and
- In general, the Office of Student Financial Aid and Scholarships (OSFAS) is doing a good job and serves the University well.