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Financial Aid Enhancement

One-time funding: \$25,000

Base funding: \$180,000

One-time funding for implementation of software and base funding for ongoing software licensing.



Subject: Financial Aid Enhancement/Title IV Course Auditor

Issue: Potential for federal financial aid being used on non-degree courses putting the federal financial aid program at risk for the offending institution for all students.

Discussion:

Federal Title IV Regulation limits federal financial aid eligibility to coursework that applies toward a student's degree. Campus Solutions, the current institutional processing system, does not support a solution for institutions to meet this federal regulation. A request for consideration of a third-party bolt-on product to accomplish this is being sought.

To be eligible for Title IV funds, a student must be a regular student as defined in 34 CFR 600.2 of the Institutional Eligibility regulations. A regular student is defined as: "A person who is enrolled or accepted for enrollment at an institution for the purpose of obtaining a degree, certificate, or other recognized educational credential offered by that institution." Therefore, the school cannot award federal Title IV aid for credit hours/course work that will not count towards the completion of that student's degree program requirements (or otherwise result in a degree, certificate, or credential).

Recommendation: Provide one-time funding of \$25,000 for implementation of software and \$180,000 of base funding for ongoing software licensing.

Coursework for Degree Completion Solution

Business Case

6/17/2024

Compiled by Brenda Zastoupil, NDUS Financial Aid Director

CONCERN:

Federal Title IV Regulation limits federal financial aid eligibility to coursework that applies toward a student's degree. Campus Solutions, the current institutional processing system, does not support a solution for institutions to meet this federal regulation. Thus, a request for consideration of a third-party bolt-on product to accomplish this is being sought.

REGULATORY CITATION:

To be eligible for Title IV funds, a student must be a regular student as defined in 34 CFR 600.2 of the Institutional Eligibility regulations. A regular student is defined as: "A person who is enrolled or accepted for enrollment at an institution for the purpose of obtaining a degree, certificate, or other recognized educational credential offered by that institution." Therefore, the school cannot award federal Title IV aid for credit hours/course work that will not count towards the completion of that student's degree program requirements (or otherwise result in a degree, certificate, or credential).

SUMMARY OF DISCUSSIONS TO-DATE:

Input 3.1 of the SBHE Efficiency & Opportunity Committee highlighted the concern.

1. Input 3.1: *"Although there are routine upgrades for the PeopleSoft information systems, there are also gaps in the software that do not get addressed and do not adhere to financial aid regulations. An example is that Financial Aid Offices are required to ensure that the classes a student has signed up for count toward their degree programs. Only courses that count toward the degree program are eligible for (federal) financial aid. Currently, PeopleSoft does not offer this functionality, and a third-party vendor would have to be used..."*
2. A working group consisting of financial aid directors, student records personnel, and CTS business analyst staff met over the past year to discuss the issue.
 - a. A recommendation was brought forward to have CTS create a report(s) to determine the extent of the issue. Given the broad scope of creating such reports, CTS was not able to narrow down the criteria given the parameters presented. This approach would provide institutions the option whether to implement, and when. There are CTS staffing and maintenance concerns with development requests. This option was not discussed as a solution, but just a way to gauge compliance.
 - b. A review of implementation of the degree audit feature of Campus Solutions, which would be needed to implement any solution, was done. All but one institution had significant implementation completed. The extent to what additional implementation would be needed is unknown at this time. Degree audit must be updated and kept current in order for any solution to work properly.

- c. Human resources were discussed. Any implementation would require significant time, not only of institutional staff, but also CTS staff. Ongoing review of student data, once implemented, would extend beyond the financial aid office, including the need to keep the degree audit component of CS up to date.
3. An RFI was conducted in 2022. HighPoint was the sole respondent. HighPoint has a bolt-on product specifically for Campus Solutions that could be a viable solution to implement this regulation. Based on that RFI, a recommendation to include a request for funding such solution will be included in the brief to the State Board of Higher Education in June. The request, if approved, would move the item forward to the 2025 Legislative Assembly. If legislative approval and funding is given, it would open the way to conduct an official RFP and engage a CTS project manager. This would be a system-wide solution for all 11 institutions that would be funded through appropriations.
4. June 2024 SBHE Request – 2025-27 Appropriation Request(revised 2-12-25)
 - One Time Funding for implementation : \$25,000
 - Ongoing Funding: \$180,000 for software licensing
 - Institutions would be responsible for the review and evaluation of student

ALL 11 INSTITUTIONS – ACTION ITEMS:

1. July SRUG and CUSAD meetings – Institutions will need to be prepared to vote to:
 - a. Move forward with the funding request (if approved by the SBHE in June), thereby supporting the path to conduct an RFP and seek a third-party vendor to implement a solution.
 - b. Not move forward with the funding request. It will be assumed that each institution will implement their own processes to comply with the Title IV regulation.
2. Conduct discussions with appropriate senior staff and associated departments on each campus and be prepared to vote at the July meetings.