2018 NATIONAL HISTORICALLY BLACK COLLEGES AND UNIVERSITIES WEEK CONFERENCE

HBCU COMPETITIVENESS:

Aligning Institutional Missions With America's Priorities

September 16-19, 2018
Washington Marriott Wardman Park
2660 Woodley Road, NW
Washington, DC 20008

Presidential Leadership-Implications for Title IV Compliance and Student Success

Minority Serving and Under Resourced School Division

Dr. Marcia Boyd
Director
Federal Student Aid

Minority-Serving and Under-Resourced School Division

- Unit was created in response to a series of Presidential Executive Orders

- Provide assistance to strengthen the Title IV administrative capabilities

Minority-Serving and Under-Resourced School Division

Staff Locations

Atlanta

5

DC

8

Dallas

1

San Juan, PR

1

Minority-Serving and Under-Resourced School Division

School Clients

- Historically Black Colleges & Universities
- Hispanic-Serving Institutions (HBCUs)
- Tribal Colleges & Universities (TCUs)
- Asian American & Native American Pacific Islander-Serving Institutions (AANAPISIs)
- Alaska Native & Native Hawaiian Institutions (ANNH)
- Predominately Black Institutions (PBIs)

Minority-Serving and Under-Resourced School Division

- Expand opportunities for these institutions to participate in Title IV and other Federal Programs.

- Proactively identify the unique service needs of HBCU's, HSI's, TCU's, PBIs, AANAPISIs, and ANNHs as it relates to the management of the Title IV programs.

- Work collaboratively with other USED and government agencies to strengthen institutions and increase funding levels.

White House Initiative on Historically
Black Colleges and Universities

Minority-Serving and Under-Resourced School Division

MSURSD Services and Training

- Internal Institutional Title IV Assessments
- Specialized Staff Training
- Technical Assistance
- On-campus Site Visits
- Management Consultations

Minority-Serving and Under-Resourced School Division

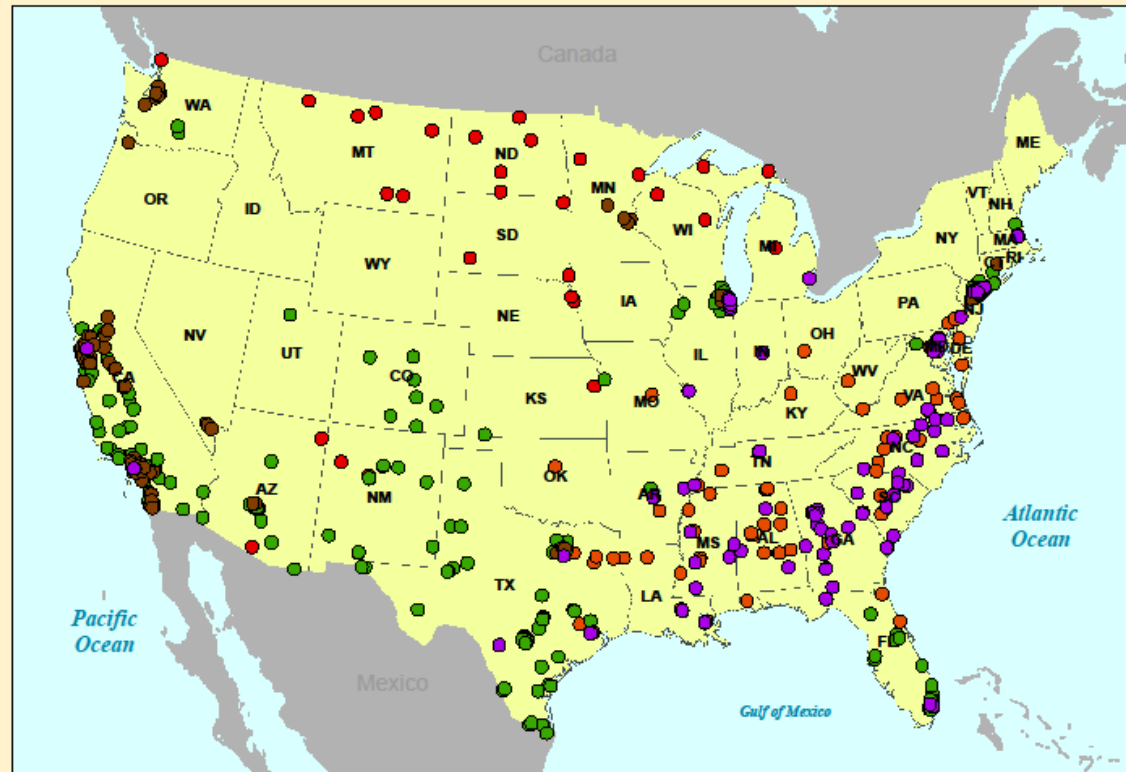Minority Serving Institutions and Predominately Black Institutions (MSIs and PBIs) 799

Legend
Minority Serving Institutions and Predominately Black Institutions
- TCU
- HBCU
- HSI
- AANAPISI
- ANNH
- PBI

Note: Only institutions in the United States are shown.

Minority-Serving and Under-Resourced School Division

MSURSD Services/Outreach Efforts

− Institutional Title IV Assessments

− Staff Training/Technical Assistance

− Interactions with Presidential/Higher Educational Associations

Minority-Serving and Under-Resourced School Division

Cluster Category	Number of Institutions
Asian American and Pacific Islander-Serving Institutions	147
Alaskan Native and Native Hawaiian Institutions	26
Historically Black Colleges and Universities	102
Hispanic-Serving Institutions	392
Predominately Black Institutions	98
Tribally Controlled Colleges and Universities	34
Total	799

Please Note: Some institutions have dual designations and are counted under both designations.

White House Initiative on Historically
Black Colleges and Universities

Minority-Serving and Under-Resourced School Division

Annual Enrollments (Fall 2016)

Cluster Category	Enrollment
Asian American and Pacific Islander-Serving Institutions	1,041,545
Alaskan Native and Native Hawaiian Institutions	51,441
Historically Black Colleges and Universities	234,483
Hispanic-Serving Institutions	1,905,579
Predominately Black Institutions	197,396
Tribally Controlled Colleges and Universities	9,989
Totals	3,435,697

Please Note: Some institutions have dual designations and are counted under both designations.

Minority-Serving and Under-Resourced School Division

Cluster Category	Total Title IV Disbursed
Asian American and Pacific Islander-Serving Institutions	7,565,594,529
Alaskan Native and Native Hawaiian Institutions	383,537,871
Historically Black Colleges and Universities	3,371,845,418
Hispanic-Serving Institutions	14,716,518,082
Predominate Black Institutions	2,104,817,466
Tribally Controlled Colleges and Universities	44,850,377
Totals	28, 187,163,744

Please Note: Some institutions have dual designations and are counted under both designations.

Common Concerns

Staff Turnover - Significant turnover in senior leadership and administrative ranks

Technology – lack of campus staff expertise, often student information systems are used to patch problems rather than solve them.

Training – lack of awareness of rules that govern Title IV funding, staff are not trained properly, resulting in numerous audit findings and large liabilities

Consumer Disclosures – common finding for not providing required information to prospective, current students, faculty and staff and result in large sanctions and fines

Risk Management – Securing student files and personal identifiable information, no assessments of policies and procedures or staff, cyber-security and protecting campus computing systems

Common Concerns:
Campus Involvement and Understanding of the importance of Title IV aid to the institution. Everyone plays a role, and the it starts with the CEO/President. Ultimately, the CEO/President is responsible for the Title IV Program.

Essential Strategic Considerations

Develop a succession plan, for senior level and key administrative positions.

Develop homegrown talent

Develop a plan that addresses technological needs, IT staffing needs, training needs of staff (campus-wide), plans to protect the system from cyber attacks, fraud and abuse

Form a campus-wide committee to ensure all Consumer Disclosures are prepared and disseminated properly

Develop policies and procedures and operational manuals for all departments that play a role in the administration of Title IV funding

Secure technology that solves problems rather than patch it

Develop an annual Financial Aid Calendar that is shared with the entire Leadership cabinet, (i.e. The Fiscal Operations Report and Application to Participate – FISAP, authorization and disbursements, audits, etc.)

Respond, Respond, Respond to ED's phone calls, emails, requests, its in your best interests!

Minority-Serving and Under-Resourced School Division

Partnerships/External

NASFAA

College Board

FDIC

WHI/HBCUs

WHI/TCUs

WHI/HSIs
Group

PBIs

SACS

NAACP

NAFEO

UNCF

USA Funds

MSI Funders

HBCU Title IV Compliance:
Warning Indicators and TA Resources

Robin S. Minor
Chief Compliance Officer
# Federal Student Aid

HBCU Engine Light Flashing
What Does the Data Show

- Over the past several years, and with increasing frequency, FSA's Program Compliance Office has noticed a concerning trend of HBCU's encountering administrative and financial challenges.

- Results are increased punitive TIV compliance actions, escalation in audit irregularities and findings, restrictive method of payment across HBCUs, and in some cases, institutional closure.

- As of August 2018, roughly one half of all HBCUs were experiencing issues related to accreditation, had open audit and program review concerns, and/or were participating in Title IV programs under a Provisional Program Participation Agreement.
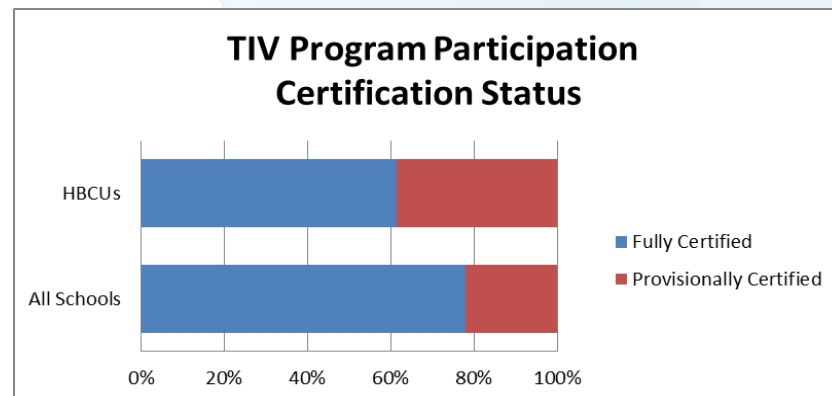
TIV Compliance Data Dashboard

HBCUs on Heightened Cash Monitoring
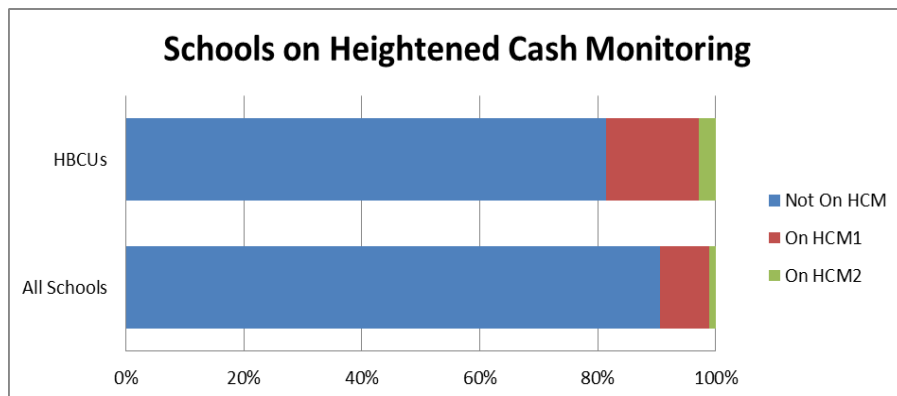
June 2018

- 9% of <u>all</u> participating TIV institutions were on restrictive cash monitoring.
- 19% of all HBCUs were on HCM1 or HCM2.
- 3% of HBCUs were participating via HCM2 vs. 1% of all TIV institutions.
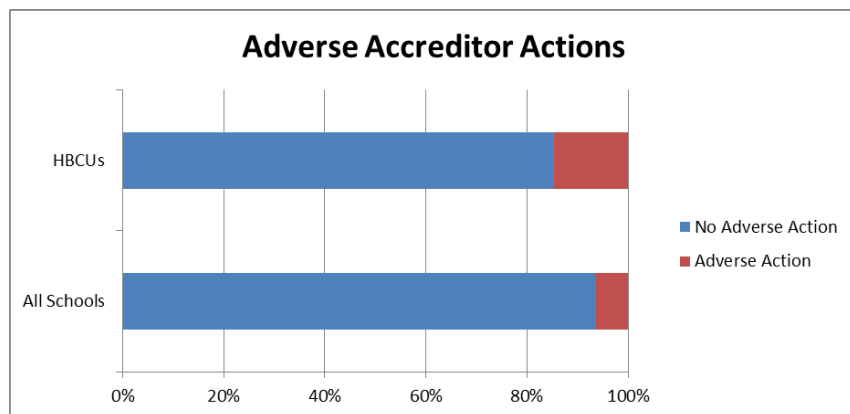
HBCUs with Provisional PPAs

August 2018

- 22% of all eligible institutions are provisionally certified to participate in TIV programs.

- 39% of all HBCUs are provisionally certified to participate in TIV programs.
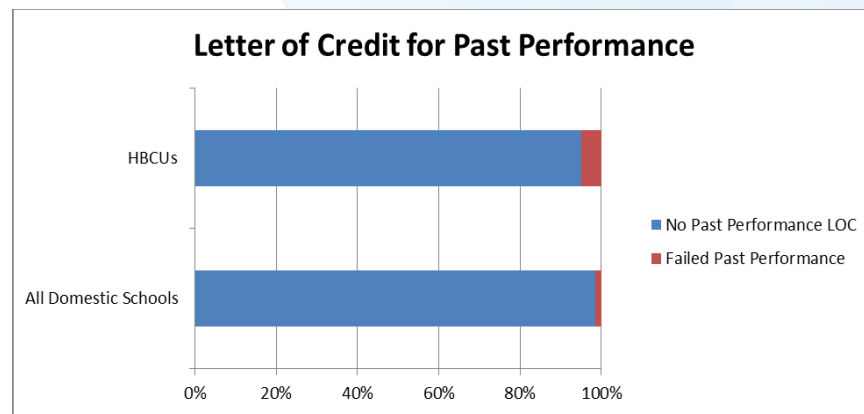
TIV Compliance Data Dashboard

HBCUs: Adverse Accreditor Actions

HBCUs: LOC for Past Performance

Adverse Accreditor Actions

Legend:
- No Adverse Action (blue)
- Adverse Action (red)

Categories: HBCUs, All Schools
Axis: 0% 20% 40% 60% 80% 100%

Letter of Credit for Past Performance

Legend:
- No Past Performance LOC (blue)
- Failed Past Performance (red)

Categories: HBCUs, All Domestic Schools
Axis: 0% 20% 40% 60% 80% 100%

January 2014 to August 2018

- 6% of all participating TIV institutions were placed on probation, show cause or an equivalent by an accreditor.

- 15% of HBCUs were sanctioned by accreditors during this timeframe.

June 2018

- 2% of all participating TIV institutions remitted Letters of Credit due to failure of the past performance standard.

- 5% of HBCUs had remitted Letters of Credit to ED for this reason.

White House Initiative on Historically Black Colleges and Universities

Need Help: Where to Go

- Contact your Regional Program Compliance School Participation Division for questions on compliance actions and sanctions.

- Reach out to the Department's MSURSD for campus-based training and technical assistance opportunities.

MSI Title IV Leadership Best Practices: Research and Training

Barbara Walker
Project Manager
WindWalker Group

About Windwalker Group

- An award-winning, 8(a) small business with more than 25 years of experience

- Research

   − We helped measure and assess American high school students' problem-solving skills.

   − We helped assess the math and science skills of American elementary and middle school students.

   − We helped the U.S. Department of Education understand the condition of education for Native American and Alaska Native students.

About Windwalker Group cont.

- Training

  − We created award-winning training on the US Army's substance abuse program, ensuring that soldiers struggling with addiction can get the help they need.

  − We helped Amtrak train first responders for train-related emergencies in their communities.

  − We trained the entire U.S. Postal Inspection Service on a new web-based information system.

MSI Leadership Best Practices Research Methodology

- Semi-structured interviews with college presidents and leaders from industry organizations who were asked to share leadership actions or strategies that:

  − Are having a positive impact on affordability at their institution

  − Are implemented to comply with the timely and accurate submission of OMB Circular A-133 audit requirement

  − Ensure that the institutional use of Title IV funds is maximized to support institutional student success metric goals

  − Set an overall institutional ethos and environment that is consistent with the Department of Education's specific Clery Act provisions for that require the monitoring and reporting of crime related activities

MSI Leadership Best Practices Research Outcomes

- Identification of ten best practices
- Affordability
  - Asking the right questions
  - Centering around the student, serving the community
- OMB Circular A-133 audit requirement
  - Maintaining a rigorous audit environment

MSI Leadership Best Practices Research Outcomes cont.

- Use of Title IV funds to support student success goals
  - Focusing on student success, not student deficits
  - Reaching students where they are
  - Providing less expensive forms of aid while keeping tuition low
  - Diversifying funding sources
  - Providing financial literacy training for students

MSI Leadership Best Practices Research Outcomes cont.

- Overall institutional ethos and environment consistent with Clery Act provisions
  - − Forming relationships with state and local law enforcement agencies
  - − Creating a welcoming, inclusive environment
  - − Ensuring ease of Access
  - − Providing financial literacy training for students

MSI Leadership Best Practices Training

- Launching at the 1st Annual Title IV Presidential Leadership Summit, Nov. 26 – 27, 2018
- Four interactive and engaging workshops
  - Higher Education Act and Clery Act regulations
  - Managing the institution's most critical risks
  - Title IV audit compliance strategies and specific A-133 challenges
  - Improving overall institutional student success

Questions