

CHAPTER 2

ADMINISTRATIVE CAPABILITY AND ORGANIZATION

San Diego Miramar College . 10440 Black Mountain Road . San Diego, California . 92126

Policy and Procedure Manual 2019 - 2020

Policy: ADMINISTRATIVE CAPABILITY AND ORGANIZATION

Topics: This chapter specifically addresses:

- 2.1 [Institutional Organization and Adequate Staffing](#)
- 2.2 [Separation of Duties: Financial Aid Office and Fiscal Office](#)
- 2.3 [Records Management](#)
- 2.4 [Automation - Electronic Processes](#)
- 2.5 [Financial Aid Counseling](#)
- 2.6 [Default Prevention and Management](#)
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- [Software](#) (2.4)
- [Standards of SAP](#) (2.5)
- [Three Year Cohort](#) (2.7)

Terms: [Terms, Acronyms and Definitions](#)

Resources: [Resources and Regulations](#)

Exhibits: [San Diego Miramar College Exhibits](#)

Responsible Office: The Financial Aid Officer of the Financial Aid & Scholarship Services Office is responsible for reviewing, approving and updating all content in this chapter.

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2.1

INSTITUTIONAL ORGANIZATION AND ADEQUATE STAFFING

Administrative Capability

San Diego
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This chapter identifies school structure and responsibilities of personnel in the administration of Title IV programs at our college. **Refer to:** [668.16\(b\)\(2\)](#)

"To ensure that the organizational structure and administrative procedures are so designed as to provide quality service and economical use of resources" the San Diego Community College District was authorized to support the three colleges: San Diego City College, San Diego Mesa College and San Diego Miramar College. That role is described in [Mission & Goals](#).



Reminder

Enrollment Reporting Changes

Effective: July 1, 2014

Must provide enrollment reporting every 60 days.

Effective: No later than October 1, 2014

- New enrollment reporting file layouts
- New enrollment status code of "Q" for three-quarter-time
- New enrollment status at the program level, not just school level
- Must report enrollment of transfer students who have prior Title IV aid

Refer to: [DCL GEN-14-07](#)

INSTITUTION AND DIVISION REPORTING STRUCTURE

Organizational charts of the institution, division and financial aid office are provided to illustrate our school's structure. **Refer to:** [Exhibits](#)

REPORTING STRUCTURE

Within the District:

- Board of Trustees
- Chancellor
- President
- Vice President of Student Services
- Dean of Student Affairs
- Financial Aid Director

Within Financial Aid & Scholarship Services Office:

- Director of Financial Aid
- Student Assistance Technicians
- Senior Student Services Assistants
- Student Services Assistants
- Work Study Student

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OFFICES INVOLVED IN APPROVING AND DISBURSING TITLE IV AID **Refer to: [668.16\(b\)](#)**

■ **Financial Aid & Scholarship Services Office**

- Manager job title: Financial Aid Officer - Director
- General financial aid related responsibilities of office:
 - Administration of the Title IV programs
 - Administration of institutional scholarship programs: attend monthly Foundation meetings
 - Determination of eligibility for federal and school programs
 - Evaluate deferments of enrollment fees and non-resident tuition
 - Coordination of other resources such as EOPS grant, BIA, Veterans benefits
 - Attendance at Student Services Counsel
 - Manage the budget
 - Administration of Osher Scholarship
 - Review Catalog, Literature, Student Handbooks
 - Supervise staff
 - Review and approve FWS
 - Administration of all scholarships
 - Supervise outreach ambassadors and Coordinate outreach activities
 - Bureau of Indian Affairs (BIA) confirmation of eligibility by completion of application indicating the student's budget, EFC, and estimated financial aid for the school year
 - Provide financial aid presentations for high school outreach events, campus personal growth classes or at a general college activity.

■ **Accounting: Student Accounting Office**

- Manager job title: Student Accounting Supervisor
- General financial aid related responsibilities of office:
 - Process deferments for enrollment fees and non-resident tuition
 - CCPG awards and Nonresident Pell coordination
 - Deliver paper checks to students having mail delivery concerns
 - Scholarship checks deposits
 - Distribute scholarship checks
 - Provide tuition refunds for students who drop classes.

■ **Business Office: District Business Office**

- Manager job title: Controller
- General financial aid related responsibilities of office:
 - Disbursing financial aid to students, including the application of aid to student accounts to pay outstanding school costs with remainder of funds disbursed to students
 - Generate financial aid checks for students.
 - Monitor campus-based matching requirements.
 - Financial recordkeeping and reconciliation of funds coordinated monthly with Financial Aid
 - The Federal Bank Account Identification
 - Draw down financial aid funds.
 - Draw down of administrative allowance funds for use by Financial Aid
 - Maintain fiscal records of Title IV accounts.
 - Coordinate application and reporting requirements: E-APP, FISAP, BFAP, EDPMS, 272s.

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■ Human Resources

- Manager job title: Vice President of Human Resources
- General financial aid related responsibilities of office:
 - Handle final hiring process for FWS
 - Authorize a student to begin work based on results of background check and TB test
 - Handle final payroll processing for FWS

■ Registrar-Records: Records Office

- Manager job title: Student Services Supervisor I
- General financial aid related responsibilities of office:
 - Verification of enrollment
 - Loan deferment completion
 - Return of Title IV
 - Provide the "F" grade data based on last date of attendance
 - Grade and withdrawal posting
 - Coordination with financial aid for SAP monitoring.
 - GPA verification for students applying for Cal Grants

■ Student Payroll: Payroll Department at the District Office

- Manager job title: Payroll Supervisor
- General financial aid related responsibilities of office:
 - Process approved FWS timecards for payment
 - 90% are direct deposit



GOOD PRACTICE

COORDINATION WITH OTHER OFFICES AND PROGRAMS

Various offices participate in different aspects of financial aid administration. Listed below are the office areas and their involvement.

■ Admissions Office

- Manager job title: Student Services Supervisor II
- General financial aid related responsibilities of office:
 - Coordinate with financial aid to verify admission status for aid applicants
 - Document AB 540 students for residency status
 - Provide enrollment status confirmation; except SSCR is done by District's IT Office.
 - Coordinate determination of non-resident status.
 - Coordinate student ID merges for all students.
 - Provide placement, licensing statistics, and completion rates

■ Business Office: Campus Business Services

- Manager job title: VP of Administrative Services
- General financial aid related responsibilities of office:
 - Oversee budget expenditures
 - Reconcile non-Title IV.
 - Process travel requests
 - Process requisitions and other vendor contracts
 - Review hiring documents collected by Financial Aid Office; forward to HR
 - Process payroll for FWS, hourly and contracted employees; forward to HR

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- **Campus Security: College Police**
 - Manager job title: Chief of Police
 - General financial aid related responsibilities of office:
 - The Campus Security Act-Clery Report is posted on the Campus Police website.
- **Computing Services: IT Department**
 - Manager job title: Vice Chancellor of IT
 - General financial aid related responsibilities of office:
 - **District IT Liaison**
 - Daily - copies and uploads COD files through Ed Connect
 - Daily - receives COD files, backs them up, and then process into PS.
 - Once a week receives Cal ISIR files and Cal Rosters from each campus and processes them in PS.
 - Once a week creates ECQ at campuses direction and once they have reviewed create a file for them to upload to CSAC.
 - Once a month retrieves FWS through our automatic process and notify campuses it has been processed.
 - Once a week create NSLDS files and send through Ed Connect. Then the next day receive the response files and load them into PS.
 - Maintains Run Controls – creating and scheduling
 - Does Aid year processing.
 - Assists with query update and troubleshooting.
 - Assists campuses and Student Services with issue and questions that come up.
 - Participates in bi-weekly financial aid meetings.
 - Backup to Student Services - SSCR reporting into the National Student Clearinghouse
 - Handles the technical specs for new FA projects. Creates Phire projects for programmers to assign them the work.
 - Tests new PUMs that come out four times a year.
 - Tests new FA projects once programmers have finished programming.
- **Computing Services: District Business Analyzes/System Support Technician**
 - Manager job title: Vice Chancellor of Student Services
 - General financial aid related responsibilities of office:
 - Provide districtwide technical support for the Student Information System FA Module and student services related computing issues; maintain computer software system tables for the Student Information System and Student Aid Management System; monitor and analyze system performance; establish and maintain training manuals.
 - Assist in the development and maintenance of R2T4 system customization. Complete R2T4 weekly manual calculations and distribution of batch processed calculations for office staff review and approval. Compilation of term R2T4 summaries at the end of each semester.
 - Assist financial aid offices with the manual posting of financial aid awards not automatically processed or awarded by the system and the posting of external awards.
 - Manage financial aid suspense file.
 - Assist resolving duplicate records.
 - Assist students submitting portal tickets related to financial aid.
 - Assist with system testing of financial aid processes and yearly rollover.
 - Report to campus Financial Aid Directors PeopleSoft updates and unresolved system issues pertaining to or affecting the financial aid module processes.
 - Assist with implementation of High Point Course Auditor Project or other financial aid related system implementations.
 - Serve as liaison between student services system users and District Student Services; provide training.
 - Provide workshops and training materials and manuals as necessary.

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- Conduct research and analyses of a paraprofessional nature; coordinate, plan, and organize special projects, studies, and analyses; collect information and data from internal and external services; compile, organize, arrange, and analyze collected data and information.
- Assist in the formulation and preparation of operational policies, procedures, and forms related to the student services system; submit recommendations on assigned projects.
- Apply and interpret District policies, procedures, rules, and regulations. Address sensitive materials; assist staff members with administrative problems and procedures.
- May represent department or unit in meetings or conferences; act as liaison between student services and other segments of the District or the public.
- Train and provide work direction to clerical and other staff as assigned; may provide in-service training to administrative, clerical, and other staff.
- Conduct research of student records and gather documents in support of student issues.
- Facilitate bi-weekly financial aid meetings.

■ **Counseling Office**

- Manager job title: Counseling Chair
- General financial aid related responsibilities of office:
 - Prepare educational program plans (Ed Plans); required from all students in an appeal situation or from students who request a sophomore level loan
 - Academic counseling for students on financial aid appeal
 - Representative for appeals committee

■ **Disability Support Programs and Services**

- Manager job title: Counselor/Professor
- General financial aid related responsibilities of office:
 - Coordination of budget adjustments so disability-related expenses will be considered.
 - Prepare education plans for disabled students
 - Coordination of Voc-Rehab resources for consideration when awarding student aid

■ **EOPS**

- Manager job title: EOPS Coordinator
- General financial aid related responsibilities of office:
 - Coordination of EOPS Awards to ensure students do not exceed their financial need.
 - Coordination of CARE assistance to ensure students do not exceed their financial need.
 - Coordination of CalWORKS/Work-Study Awards to ensure students do not exceed their financial need.
 - Coordination of NEXTUp assistance to ensure students do not exceed their financial need.

■ **Evaluations Office**

- Manager job title: Admissions Director coordinates with District Office
- General financial aid related responsibilities of office:
 - Calculate manual GPAs for Cal Grant (most GPAs provided electronically by system)

■ **Institutional Research**

- Manager job title: Director of Institutional Research
- General financial aid related responsibilities of office:
 - Compile and submit statistical data required for Title IV requirements, such as College Navigator, IPEDS, MIS, Gainful Employment and Student Right to Know

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■ Outreach-Recruitment Office

- Manager job title: Outreach Coordinator
- General financial aid related responsibilities of office:
 - High school visitations, financial aid nights
 - Campus tours, in-reach and out-reach throughout San Diego County
 - Guide and manage Student Ambassadors

■ Placement Center

- Manager job title: Placement Center Supervisor
- General financial aid related responsibilities of office:
 - Assistance with application process
 - Job postings of Non-FWS part-time jobs in community
 - Practice job interview skills
 - Test Coordination
 - Placement services
 - Resume services

■ Scholarships: Financial Aid & Scholarship Services Office

- Manager job title: Financial Aid Officer
- General financial aid related responsibilities of office:
 - Coordination and awarding of Foundation, institution and outside scholarships
 - Coordination of Scholarship opportunities with Donors
 - Coordination of Scholarship announcements
 - Coordination of Annual Scholarship Awards Ceremony
 - Development of and maintenance of MOU's and Fund raising activities
 - Work with Accounting Office for disbursement.
 - Attend Foundation meetings; coordination and participation in fund raising events.
 - National Merit Awards

■ Student Affairs

- Manager job title: Dean of Student Affairs
- General financial aid related responsibilities of office:
 - Handle deferment processing
 - Coordinate Constitution Day program, campus drug and alcohol abuse prevention program, Campus Security Act-Clery Report, Student Right to Know
 - Enforce Student Code of Conduct
 - Handle complaints regarding the Financial Aid & Scholarship Services Office

■ Student Employment – FWS: Financial Aid & Scholarship Services Office

- Job title: Student Services Assistant – Provide clerical support to the FWS program
- General financial aid related responsibilities of office:
 - Posting FWS positions,
 - Collects all employment documents needed for hiring; forward to Campus Business Office and submits to District Personnel-Payroll Office.
 - The Financial Aid Director signs-off hiring forms.
 - Prepares time cards for payroll; forward to Campus Business Office
 - The Financial Aid Director approves FWS timesheets
 - Monitor budget to ensure we meet fund usage
 - Monitor individual student employee's earnings to ensure earnings do not exceed eligibility
 - Coordination of meeting Community Service requirements
 - Coordination of auditing FWS timesheets.

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- **Transfer Center**
 - Manager job title: Transfer Center Coordinator
 - General financial aid related responsibilities of office:
 - Transfer requirements and agreements
- **Veterans Services**
 - Manager job title: Student Service Supervisor I
 - General financial aid related responsibilities of office:
 - Certification of benefits

NON-SCHOOL AGENCIES INVOLVED WITH FINANCIAL AID OFFICE ADMINISTRATION

- **Third-Party Servicer for the Administration of Title IV Aid**
 - National Student Loan Clearinghouse (NSLC)
 - Enrollment updates
- **State Agency Liaisons:**
 - **Liaison for Cal Grant:** School Services Division of California Student Aid Commission (CSAC)
 - **Liaison for BOGFW:** California Community College Chancellors Office
 - **Liaison for TANE:** Department of Social Services
 - **Liaison for Voc Rehab:** Department of Rehabilitation

2.2

SEPARATION OF DUTIES FINANCIAL AID OFFICE & FISCAL OFFICE *Administrative Capability*

San Diego
Miramar College

At Miramar College, the administration of financial aid programs is divided between Financial Aid & Scholarship Services Office and District Business Services Office and Campus Business Services Office.
Refer to: [668.16\(c\)\(1\)](#)

ADEQUATE CHECKS AND BALANCES

Our school maintains a separation of functions as outlined in [668.16\(c\)](#). The functions of authorizing payments and disbursing or delivering funds are divided so that no office has responsibility for both functions with respect to any student aided under the programs.

SAN DIEGO MIRAMAR COLLEGE TITLE IV FINANCIAL AID ADMINISTRATION IS DESCRIBED BELOW.

FINANCIAL AID & SCHOLARSHIP SERVICES OFFICE

AREAS OF RESPONSIBILITY

- Administration of the federal financial aid programs, coordination of those programs to ensure the student's need is not exceeded, authorizing payment, manage all scholarship programs
- Job title of person responsible: Financial Aid Officer

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GOOD PRACTICE

Understanding how our Title IV operation is arranged.

- **Organizational chart:** Refer to: [Exhibits](#)
- **Job descriptions:** Refer to: CHAPTER 1.5 for summary descriptions
- **Our general office hours:**
 - Monday -Thursday: 8:00am-7:00pm
 - Friday: 8:00am-5:00pm
- **Summer hours:**
 - Monday - Thursday: 8:00am-7:00pm
 - Friday: 8:00am-5:00pm
- **Appointments:**
 - No scheduled appointments are necessary
 - All meetings are via walk-in, even with the Financial Aid Officer.

BUSINESS SERVICES OFFICE

AREAS OF RESPONSIBILITY

Campus: Maintain budget, reconcile non-Title IV, process payroll for FWS, hourly and contracted employees

District: Disbursing or delivering Title IV funds, maintaining records of Title IV fund accounts, monthly reconciliation, annual reporting through FISAP

- **Job title of persons responsible:**
 - **District:** Controller
 - **Campus:** VP of Administrative Services



GOOD PRACTICE

Understanding how our Title IV operation is structured.

- **General office hours for the Business Services Office:**
 - Campus: Mon-Fri: 8:00 AM – 4:30 PM
 - District: Mon-Fri: 8:00 AM – 5:00 PM
- **Appointments are made to assist our students:**
 - Campus: No appointments are taken; students are handled on a walk-in basis.
 - District: No student appointments are taken; not open to the public.

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2.3

RECORDS MANAGEMENT

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San Diego Miramar College maintains records to support its administration of the Title IV programs in accordance with all applicable requirements. Refer to: [668.24\(d\)\(3\)\(i\) through \(iv\)](#)

RECORDS MAINTENANCE

Financial records reflect each HEA, Title IV program transaction, separate from other school financial activities.

- **Miramar College maintains all required records in retrievable formats as required by the Secretary.**
 - Electronic records, such as ISIR, are maintained as part of regular system back-up.
 - Documents received in paper format are imaged as received (Web Extender) and stored in system.
 - Paper kept for 3 months; then sent to be shredded.
- **Our procedures ensure that we meet the record retention requirements.**
 - Disposal of records is done according to this schedule: Started imaging documents in 2007.
 - We are down to a very small file that we are retaining.
 - Annually we purge files starting in October.
 - All documents are permanent record and every 3 months we send paper to shred.
- **Location of records**
 - A school is not required to maintain records in any specific location. The responsible administrator in the office maintaining the records should be aware of all applicable record retention requirements.

FISCAL RECORDS ARE MAINTAINED IN THESE LOCATIONS AT SAN DIEGO MIRAMAR COLLEGE	
COPY OF SIGNED FISAP	District Business Services Office
OFFICIAL GENERAL LEDGER	District Business Services Office
AUDIT RECORDS	District Business Services Office
RECORDS OF DISBURSEMENT	District Business Services Office
RECONCILIATION, G5 AND DRAW-DOWNS	District Business Services Office
VA CHAPTER 33 - VOC REHAB 3RD PARTY BILLING	District Accounts Receivable
OUTSIDE SCHOLARSHIPS	Campus Accounting Office
529 PLANS	Campus Accounting Office
CA BFAP REPORT	Financial Aid & Scholarship Services Office
CLOSE OUT OF ALL PROGRAMS	FA&SSO with District Business Services Office

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AUDIT AND PROGRAM REVIEW PROCESS

- Miramar College cooperates with any reviews, audits, investigations, or program reviews authorized by law.
 - Annual audit review is coordinated by district Business Services.
 - Entrance interview is handled by Financial Aid Officer; exit interview by district.
 - About 1-2 weeks before the audit the school gets a listing of students from auditor.
 - Financial Aid gathers records and prepared for the audit.
 - The district gets the preliminary exit report and has the exit interview.
 - CSAC Cal Grant review is coordinated with the Financial Aid Officer.
 - Both entrance and exit interviews are done with Financial Aid Officer.

Refer to: CHAPTER 3 FISCAL MANAGEMENT; [P&P Manual FSA Assessment, Section 1](#), pp.22-25

Self-Evaluation Process

- We do a program review for prior year to review prior year goals and set new goals.
- We submit yearly goals as part of Student Services Learning Outcomes to target a process or specific population to determine whether our procedures have made a difference, such as the use of financial literacy orientations.
 - Utilize NASFAA's Self Evaluation Guide for an internal compliance audit. If there are particular areas of concern, focus on those.
 - Set processing goals at the start of the cycle and track meeting those goals. Include number of apps with first reviews completed by target dates; time for file processing turnaround goals from app/doc receipt to completion
 - Approximately one week after start of a term, have a staff debriefing meeting to talk through what types of issues there were and ideas for what to do differently for the next term to improve.

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2.4

AUTOMATION - ELECTRONIC PROCESSES

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This section summarizes automation support used by Miramar College for the administration of Title IV programs. Refer to: [668.16\(o\)](#)

SOFTWARE

- **Type of software application used by our Financial Aid & Scholarship Services Office:**
 - Sigma SAM
 - Integrated system, including extensive District enhancements
 - Campus Solution (PeopleSoft) – Live Spring 2019 of 2018-2019 AY.
- **Type of software application used by the Business Office:**
 - Datatel (HR also uses Datatel.)
 - Campus Solution (PeopleSoft)
- **Our process for how ISIR records are received through EDconnect or FAA Access to CPS online is:**
 - Downloaded from EDconnect by IT Department once per week to Sigma SAM
- **How that data is entered into our computer system:**
 - Automatic system, daily downloads into FA system; packaging then is done daily.

AUTOMATION SYSTEMS

- **System for Reviewing Files:**
 - School sets criteria and system evaluates.
 - Campus Solution (PeopleSoft) gives an output report that identifies those records that are auto packaging and advises of which ones are ready for review and verification; system requests docs appropriately
- **System for Requesting Verification Documents:** Campus Solution (PeopleSoft)
 - We program docs requested based on data transfer and comment codes from ISIR. Example: if did not file, request W-2. Staff can add notes on what's missing that can be seen real time by students.
 - Automatic: Two follow-ups monthly.
 - Third follow up is on request
- **System for Budget Construction:** Campus Solution (PeopleSoft)
 - Automatic generation (streamline packaging with budget types)
- **System for Packaging:** Campus Solution (PeopleSoft)
 - We package twice per week; package on weekend and every Wednesday night.
- **System for SAP Determinations:** Campus Solution (PeopleSoft)
 - After final grades are posted and approximately 3 weeks after semester has ended.

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- **Computer systems are backed up in this way for all records:**
 - Data from financial aid system is backed up every night by Computing Services.
 - Data information is kept active for a year after school year ends, and then it is archived. Data can be retrieved from archive upon request.
 - A weekly “emergency” disk listing pertinent financial aid student information is kept up to date in Financial Aid & Scholarship Services Office.
 - Every week 3 copies are made by District
 1. IT Department copy
 2. Server secure drive stored off site
 3. Downloaded to a thumb drive at the campus level (kept in a safe)
- **Security Measures in place to protect private information include:**
 - User name and password authentication
 - **LEVELS OF SECURITY:**
 - Access level is based on office position. Access is restricted to “need to know” for job function.
 - Financial Aid has access to SSN; for some other offices, the SSN is masked.
 - **ENCRYPTION:**
 - Use ED’s security protocol for financial aid processing (for COD, CPS, NSLDS).
 - Campus data system is secure for privacy when students or parents submit confidential information.

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2.5

FINANCIAL AID COUNSELING

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Financial aid counseling for students at San Diego Miramar College addresses the points listed below.

Refer to: [668.16\(h\)](#); [668.22](#)

CONSUMER INFORMATION

There are specific topics of information that must be made available to students regarding such things as the availability of financial aid programs, application procedures, how eligibility is determined, a student's rights and responsibilities and other policies that affect a financial aid recipient.

■ REVIEW AND UPDATE PROCESS

- Financial Aid consumer information is provided in various publications including:
 - [College Catalog](#)
 - [College Schedule](#)
 - [Financial Aid Bulletin](#)
 - [Satisfactory Academic Progress\(SAP\) for Financial Aid](#)
- Consumer information publications are made available to all students by placing the bulletins and brochures on display racks. In addition, the catalog is available on-line and at the bookstore.
- [The Catalog](#): V.P. of Student Services revises the catalog annually, with input from various campus departments.
- [The District Financial Aid Bulletin](#): The Financial Aid Directors revise annually. If changes are made, the District Student Services Council approves them.
 - Consumer information is reviewed once a year around November or December.
 - The Financial Aid directors in the District meet and confer about the Financial Aid Bulletin. The Financial Aid Bulletin is a combined consumer information publication for San Diego City, Mesa and Miramar colleges.
 - The Financial Aid Bulletin is distributed in January for the upcoming academic year. This joint publication is done to provide similar information at all campuses and to reduce overall printing costs.

■ SOURCES AND AMOUNTS of each type of aid awarded:

- Provided on a student's award letter
- Provided in online award
- May be viewed on [Reg-e](#) (enrollment system) and provided in paper format

■ METHOD by which aid is determined and disbursed, delivered or applied to a student's account:

Provided online:

- [Financial Aid Page](#)
- [Disbursement \(Payment\) Dates](#)
- [Notification of awards and disbursement of funds](#)
- May be viewed on [Reg-e](#) and provided in paper format

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■ **RIGHTS AND RESPONSIBILITIES OF STUDENT** with respect to enrollment and receipt of financial aid

Provided online and in paper format

- [Terms of Agreement](#) is an electronic version provided as needed
- [Financial Aid Bulletin](#) p.18

■ **REFUND POLICY** and the treatment of Title IV funds when a student withdraws

Provided online and in paper format

- [Refund of Title IV Policy](#)
- [Notification of Awards and Disbursement of Funds](#)
- [Financial Aid Bulletin](#) p.12

■ **STANDARDS OF SAP**

Provided online:

- [Financial Aid Page - SAP](#)
- [Satisfactory Academic Progress](#)
- [Financial Aid Bulletin – SAP](#), p.16
- SAP brochure and Bulletin are also provided in paper format.

■ **OTHER CONDITIONS**, such as outside resources, that may alter the student's aid package

Provided online:

- [Financial Aid Bulletin](#) p.6

Refer to: CHAPTER 18.6 FEDERAL DIRECT LOANS – *Counseling Borrowers*

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2.6

DEFAULT PREVENTION AND MANAGEMENT

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Default prevention and management promote student success, helps our students learn, graduate, obtain employment, and demonstrate financial responsibility through repayment of the funds borrowed to finance their education. **Refer to:** [34 CFR Subpart N](#); [Appendix A to Subpart N](#)

MIRAMAR COLLEGE DEFAULT PREVENTION AND MANAGEMENT PLAN

STEPS TAKEN TO PREVENT DEFAULTS AND MANAGE THE STUDENT LOAN PROGRAM:

- Designated Default Prevention and Retention Staff: Student Assistance Technician
- We access the loan information in the National Student Loan Data System (NSLDS) to help prevent ineligible students from receiving loans and ensure that legal loan limits are not exceeded.
- To encourage lower borrowing limits, any student who is borrowing an Unsub loan must have a one-on-one meeting with coordinator prior to application being given out; we do not post app online.

BORROWER CONTACT

SAN DIEGO MIRAMAR COLLEGE PROVIDES BORROWERS THE FOLLOWING RESOURCES AND TAKES THESE STEPS TO SUPPORT AND ENCOURAGE SUCCESSFUL REPAYMENT:

- **At Enrollment**
 - Entrance counseling and financial literacy are provided for borrowers
- **While Enrolled:**
 - We contact students who drop below half time.
- **At Withdrawal:**
 - We provide exit notification.
- **Early-Late Stage Delinquency, we utilize NSLDS Date Entered Repayment (DER) Report:**
 - Begin Early Stage Delinquency Assistance at time of separation or early in the grace period.
 - Offer Late Stage Delinquency Assistance (LSDA) to rescue severely delinquent borrowers.
 - Phone each student for whom we have student contact information.

Refer to: CHAPTER 18.6 FEDERAL DIRECT LOANS – *Counseling Borrowers*



GOOD PRACTICE

SUGGESTIONS TO IMPLEMENT

Borrower Contact for Proactive Default Management

At Initial Loan Application

- Add [Entrance Counseling Guide](#) to our resources list
- Add Introduction to [NSLDS Student Access](#) to our resources list
- Add [Federal Student Loan Basics for Students](#) to our resources list

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- **At Enrollment:**
 - Develop a default prevention and management plan to implement as early as during student enrollment.
 - Track and analyze records of defaulted borrowers to determine patterns or problems that can be addressed at earlier stages for prevention.
 - Review details of the “drop out” student population through enhanced enrollment retention and academic persistence efforts, including counseling and academic assistance, especially for high-risk students.
- **While Enrolled**
 - Staff (Academic Advisors, faculty, Cashiers, Records) to communicate across campus with applicable personnel regarding a student’s plan change that may affect financial aid eligibility.
 - Periodic email blasts to students or blurbs in student paper about money management tips.
 - Periodic emails to borrowers about loan management tips.
 - Add [Entrance Counseling Guide](#) to our resources list
 - Add [Federal Student Loans Basics for Students](#) to our resources list
- **Before Leaving**
 - Provide loan management information at late stages of attendance.
 - Coordinate with Transfer Center to provide workshops.
 - Based on anticipated completion date, send reminder email about next loan management step.
- **At Graduation or Transfer**
 - Provide counseling and links to websites for students graduating from school (proactive to remind students prior to entering repayment).
 - Staff maintains contact (PHONE CALLS) after students leave school to confirm movement into repayment or aid with deferment processing.
- **At Withdrawal**
 - Notify servicer of withdrawal.
 - Communicate to students about the withdrawal process; make it quick and easy to do. Give a benefit or reward for notifying school.
 - Provide counseling for students who withdraw from school because these borrowers are at the highest risk of default and can possibly be helped while still on campus.
 - Maintain contact after students leave school. Identify reason/s for leaving and support return to school if that is student’s desire.
 - Provide referrals to child care resources; offer transportation options; coach borrowers into repayment.
- **During Early-Late Stage Delinquency**
 - Begin Early Stage Delinquency Assistance at the time of separation or early in the grace period.
 - Offer Late Stage Delinquency Assistance to rescue severely delinquent borrowers.
 - Analyze defaulted loan data to identify defaulter characteristics to discern who is defaulting and why.
 - Develop targeted interventions.
 - Utilize servicer for Date Entered Repayment Report
 - Loan Coordinator to verify enrollment level for Clearinghouse
 - Utilize NSLDS Date Entered Repayment Report

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2.7

COHORT DEFAULT RATE AND MANAGEMENT

Administrative Capability

2.7

COHORT DEFAULT RATE **Refer to:** [668.16\(m\)\(1\)](#); [34 CFR Subpart N](#)

- For schools having 30 or more borrowers entering repayment in a fiscal year, the school's cohort default rate is the percentage of a school's borrowers who enter repayment on certain Federal Family Education Loans and or Direct Loans during that fiscal year AND default within the cohort default period.

COHORT DEFAULT PERIOD:

- The time during which a borrower's default affects the school's cohort default rate.
- The cohort default period refers to the three-year period that begins on October 1st of the fiscal year when the borrower enters repayment and ends on September 30th of the second fiscal year following the fiscal year in which the borrower entered repayment.



Reminder

THREE-YEAR COHORT DEFAULT RATES

Effective: Beginning in 2014

With the release of the three-year cohort default rates from FY 2011, schools will no longer receive both two- and three-year rates.

EFFECT OF CDR [668.16\(m\)\(1\)](#)

A school is not considered to be administratively capable when:

- CDR for Federal Stafford/SLS loans or Direct Subsidized/ Unsubsidized Loans made to students for attendance at the school equals or exceeds 30% for two of the three most recent fiscal years, or
- CDR for Perkins loans made to students for attendance at the school exceeds 15%.

When a high default rate demonstrates a lack of administrative capability, a school may become ineligible to participate in the Direct Loan, Pell Grant, or Perkins programs. The Department may choose to provisionally certify such a school.

Refer to: [Cohort Default Rate Guide](#) (for default requirements and challenges and appeals to default rates)



GOOD PRACTICE

PROACTIVE COHORT DEFAULT RATE MANAGEMENT

- Analyze defaulted loan data to identify defaulter characteristics to discern who is defaulting and why.
- Develop targeted interventions.

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2.7

COHORT DEFAULT RATE AND MANAGEMENT OUR PROCEDURES

San Diego
Miramar College

MIRAMAR CDR

THREE-YEAR RATES

THREE YEAR RATE	FY2013	FY2012	FY2011
DEFAULT RATE	15	16.8	21.0
NO. IN DEFAULT	36	46	44
NO. IN REPAY	239	273	209
ENROLLMENT FIGURES	20,702	23,179	21,822
PERCENTAGE CALCULATION	1.1	1.1	0.9

SOURCE: [Three Year Official Cohort Default Rates for Schools](#)

Fiscal Year	Process Date	San Diego Miramar College
Loans in this group first entered repayment during the federal fiscal year.	The official cohort default rates were calculated and announced to the public during this calendar date	The Cohort Default Rates (CDRs) for loans used to attend San Diego Miramar College
2017	8/8/2020	10.1%
2016	8/3/2019	9.1%
2015	8/18/2018	12.7%

MIRAMAR PROCEDURES

WE MONITOR AND DECREASE OUR COHORT DEFAULT RATE INCLUDING THESE STEPS:

- Analyze data on Loan Record Detail Report (LRDR).
- Ensure rates are accurate by examination of the draft and official CDR data.
- We currently do NOT challenge data reflected since we have a relatively low CDR.

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TERMS, ACRONYMS AND DEFINITIONS

Administrative Capability and Organization

Term	Acronym	Definition
Financial Aid Administrator	FAA	An individual employed by an institution to administer and coordinate student financial aid programs.
Institutional Student Information Record	ISIR	A summary of information from the student's Free Application for Federal Student Aid (FAFSA) submitted electronically to institutions and state agencies.
National Student Loan Data System	NSLDS	An ED integrated system that collects and reports information about the financial aid history of students who receive federal student aid and maintains that information in an online database available to the financial aid community. The database stores information about loans, grants, students, borrowers, lenders, guaranty agencies (GAs), schools and loan servicers. The CPS conducts a match of FAFSA data against this database to confirm the student's identification and eligibility for federal student financial aid. Located at: http://www.NSLDS.ed.gov
The Secretary of the Department of Education	Secretary	The Secretary of the Department of Education or an official or Employee of the Department of Education acting for the Secretary under a delegation of authority.
Third Party Servicer		An individual or organization that enters a contract with a school to administer any aspect of the institution's FSA participation.
Title IV Federal Student Aid	Title IV	Financial aid programs for postsecondary students, authorized under Title IV of the Higher Education Act of 1965, as amended (Title IV, HEA) and administered by the U.S. Department of Education.

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RESOURCES AND REGULATIONS

Administrative Capability and Organization

REGULATIONS

- [668.16](#) Standards of administrative capability
- [668.22](#) Treatment of Title IV funds when student withdraws
- [668.23](#) Compliance audits
- [668.24](#) Record retention and examination
- [668.163](#) Maintaining and accounting for funds
- [34 CFR Subpart N](#) Cohort Default Rates; [Appendix A to Subpart N](#) Sample Default Prevention Plan

Action Plan

[HEA 1965](#)

[HEA 1998](#)

[HEOA 2008](#)

REQUIRED ELECTRONIC PROCESSES	
E-App Submit & Update School's Eligibility Information	www.eligcert.ed.gov
Student Aid Internet Gateway (SAIG) Enroll in SAIG	www.fsawebenroll.ed.gov
FAA Access or its SAIG Mailbox Exchange FAFSA or ISIR Data with Department's Central Processing System	http://www.fafsa.ed.gov/FOTWebWebApp/faf/faf.jsp or www.saigportal.ed.gov
COD Website or its SAIG Mailbox Exchange Award and Disbursement Data for Pell Grants, TEACH Grants, Direct Loans	cod.ed.gov or www.saigportal.ed.gov
eCampus-Based System (eCB) File FISAP Application and Report	www.cbfsip.ed.gov
NSLDS Submit School's Federal Perkins Loan Data, Student Enrollment Records, FSA Program Overpayments and NSLDS Transfer Student Monitoring Records; and Gainful Employment Records (if applicable)	https://www.nslsdfap.ed.gov/secure/logon.asp
Audits Submit School's Annual Compliance and Financial Statement Audits, and any Other Required Audits	www.ezaudit.ed.gov
Default Management Website Receive Draft and Official Cohort Default Rate Data Electronically	www.ifap.ed.gov/DefaultManagement
IFAP Website Review Dear Colleague Letters, Announcements or Federal Registers	www.ifap.ed.gov

Several of Federal Student Aid's systems, such as COD, eCB, and NSLDS, are located behind the Access and Identity Management System (AIMS), for which users have a single ID and password. An ID that has not been used within 90 days will be suspended or, after 365 days, deactivated.

Refer to: [Electronic Announcement 1/24/14](#) Instructions to reinstate a suspended or deactivated FSA user ID and PW

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Automation FSA Assessment

Activity 1: [Required Electronic Processes Worksheet](#)

Default Prevention & Management FSA Assessment

Activity 1: [Early-Late Stage Delinquency](#)

Activity 2: [Default Management Plan](#)

Activity 3: [Defaulted Borrower Profile Templates](#)

P&P Manual FSA Assessment, Section 1, pp.22-25

Three Year Official Cohort Default Rates for Schools

Default Prevention & Management Resources:

- [Default Prevention Resource Information Web page](#)
- [Entrance Counseling on studentloans.gov](#)
- [Exit Counseling on studentloans.gov](#)
- [TEACH Entrance Counseling](#)
- [TEACH Exit Counseling on NSLDS](#)
- [Your Federal Student Loans Booklet](#)
- [NSLDS Reference Materials - Newsletters](#)
- [Ensuring Student Loan Repayment Best Practices for Schools](#)
- [NSLDS Reference Materials](#)
-
- [Cohort Default Rate Guide](#)
- [NSLDS Professional Access](#)

NSLDS Reporting Requirements

- [DCL GEN-14-07](#) **Changes to NSLDS Enrollment Reporting** and
- [DCL GEN-14-17](#) **NSLDS Program Level Enrollment Reporting**

Contacting default office: The Operations Performance Division in Federal Student Aid:

- (1) Responds to questions about FFEL/DL cohort default rates,
- (2) Reviews FFEL/DL cohort default rate challenges, adjustments, and appeals, and
- (3) Provides technical assistance and outreach to schools to assist them in lowering their default rates.

Web: www.ifap.ed.gov/DefaultManagement

Email: fsa.schools.default.management@ed.gov

Hotline: 202-377-4259

FAX: 202-275-0913

ED School Participation Teams

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EXHIBITS

Administrative Capability and Organization

San Diego
Miramar College

ORGANIZATIONAL CHARTS



Organizational
Chart. Miramar.xlsx



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FINANCIAL AID BULLETIN

http://www.sdmiramar.edu/webfm_send/15112

<https://studentweb.sdccd.edu/docs/Financial%20Aid%20Bulletin.pdf>

FINANCIAL AID PROGRAMS

<http://www.sdmiramar.edu/students/financial/programs>



financial_aid_progra
ms.pdf

ONLINE RESOURCES

<http://www.sdmiramar.edu/students/financial/resources>



online_resources.pdf

RETURN TO TITLE IV POLICY

<http://www.sdmiramar.edu/content/return-title-iv-policy>



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pdf