



California  
Community  
Colleges

California  
Virtual Campus

# **CVC Exchange Financial Aid Audit and Regulatory Report**

# CVC EXCHANGE FINANCIAL AID AUDIT & REGULATORY REPORT

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The CVC Exchange is a platform intended to enable cross-registration between California's community colleges. This document outlines audit and regulatory considerations specifically related to financial aid and includes current and proposed mitigation strategies. Though college-based financial aid officers were the envisioned primary audience, it is a potential resource for any college-based stakeholder involved in Exchange implementation.

Federal and state student financial aid programs are subject to review by several regulatory agencies on an ongoing basis. Audit and/or program reviews can be triggered by the U.S. Department of Education and/or the California Student Aid Commission by compliance findings in the annual district audit, reporting errors and/or other college activities that demonstrate non-compliance. The purpose of this report is to identify **only** those areas of compliance impacted by a college's participation in the CVC Exchange under the Federal Financial Aid Consortium Agreement. Regulatory citations are provided at the end of each section.

## Annual Audits and Reports

- District audit (*Federal student aid portion to U.S. Department of Education*)
- California Community Colleges Chancellor's Office Financial Aid MIS report
- California Community Colleges Chancellor's Office BFAP and CCPG reports
- Veterans Administration audit
- Cal Grant audit by California Student Aid Commission (*Every 5-6 Years*)

## Additional Potential Audits

1. U.S. Department of Education Program Review
2. U.S. Department of Education Audit
3. California Community Colleges Chancellor's Office

## Acronyms:

BFAP: Board Financial Assistance Program  
CCCCO: California Community Colleges Chancellor's Office  
CCPG: California College Promise Grant  
CoA: Cost of Attendance  
CVC: California Virtual Campus  
MIS: Management Information System  
R2T4: Return to Title IV  
SAP: Satisfactory Academic Progress  
SIS: Student Information System  
USDoED: U.S. Department of Education

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## **CONSUMER INFORMATION**

### **A. FEDERAL & STATE COMPLIANCE**

Federal Consumer Information regulations stipulate the information that must be provided to enrolled and prospective students. All colleges, including Exchange Home Colleges and Teaching Colleges, must inform all enrolled students of financial aid information and policies, including aid available as a regular student or an Exchange student wishing to aggregate units. This includes fee waivers or other aid available to students taking Exchange courses and how students can apply, how courses taken through the Exchange affect student aid packaging at the Home College, any refund policies, and how funds are disbursed. Federal regulations stipulate how this information must be disseminated: Posted to the college website, site link distributed to students, parents, and/or employees, or sent directly to each student, parent and/or employee.

#### **Compliance Risks**

- Exchange Home Colleges do not provide information to students regarding how Exchange units transfer from Teaching Colleges to Home Colleges and how financial aid packages are affected, including course eligibility, SAP policies and R2T4 policies.
- Exchange colleges do not provide information to students regarding fee waivers and other financial aid programs available to them as a CVC Exchange student.

#### **CVC Current Risk Mitigation Strategies**

- CVC has provided each Exchange college with an electronic copy of their signed Financial Aid Consortium Agreement which is also available via hard copy (PDF) so that colleges may publicly share it with students. Additionally, the [CVC Federal Financial Aid Consortium Agreement](#) is publicly available on the CVC website. The published version includes a dropdown list of all participating colleges that have signed the contractual agreement.
- CVC conducts onboarding webinars and information sessions to inform colleges of the financial aid options available to Exchange students.
- CVC provides online resources for financial aid professionals. Colleges may include these in local consumer information toolkits.

- CVC provides financial aid information directly to cross-enrolled students via email who have requested financial aid from their Home College through the Exchange. Here is [a link](#) to the student workflow.

### **Future Risk Mitigation Strategies**

- CVC will provide updated materials to colleges as Exchange policies and technologies pertaining to financial aid are modified. Product development enhancements are addressed on a quarterly basis and CVC will publish these dates prior to the actual release of any risk mitigation feature offered through the CVC Exchange platform.

### **Compliance Reference Documents:**

- [Consumer Information, 2021-2022 FSA Handbook, Vol. 2, Chapter 6, pp. 153-164](#)

*\*Please note that, while we endeavor to keep these citations current, updates to the Federal Student Aid Handbook may be available on the [FSA Partner Connect website](#) .*

**CVC CONSORTIUM AGREEMENT:**  
***Requirement to Inform Students of an Arrangement***

**B. FEDERAL AID COMPLIANCE**

Federal regulations stipulate that the consumer information provided by a college must include Consortium Agreements with other colleges, and describe specific policies, including, how credits are accepted and applied. Federal regulations describe the context of a Consortium Agreement as allowing a student to take courses at another college (*e.g. Exchange Teaching College*) and apply those units to the student's program at the host or home school (*Exchange Home College*). Under a consortium or contractual agreement, the Home College must give credit for courses taken at Teaching Colleges on the same basis as if it had provided the training. The assumption of such an agreement is that the Home College has found the Teaching College's academic standards equivalent to its own, and the instruction an acceptable substitute for its own. There is no limit on the number of units that a student can take under a Consortium Agreement, although limits can be set in the agreement. The agreement must make clear which school will grant the degree, costs, enrollment status at each school, financial aid provided by each school, and procedures for calculating aid, R2T4, SAP and other requirements.

**Compliance Risks**

- Exchange colleges do not inform students of the Financial Consortium Agreement provisions as required by Consumer Information regulations (*34 CFR 668.43(a)(12)*)
- Teaching Colleges inadvertently awarded federal aid to Exchange students already receiving federal aid from the Home College under the Consortium Agreement.
- The Exchange does not provide the data necessary for Home Colleges to process awards, R2T4 or Satisfactory Academic Progress (SAP).

**CVC Current Risk Mitigation Strategies**

- CVC has provided each college with an electronic copy of their signed Financial Aid Consortium Agreement which is also available via hard copy (*PDF*) so that colleges may publicly share information with students. Additionally, the [CVC Federal Financial Aid Consortium Agreement](#) is publicly available on the CVC website. The published version includes a dropdown list of all participating colleges that have signed the contractual agreement.

- The CVC Exchange currently utilizes technology allowing Teaching Colleges to attach a unique SIS identifier to Exchange student enrollments. Additionally, all Exchange college financial aid offices have access to an Exchange Admin Dashboard which provides student enrollment data and reports, including requests for financial aid under the consortium agreement. Financial Aid personnel can use this information to verify if a student is seeking federal aid from their Home College as part of the consortium agreement, and thus avoid awarding additional federal aid.
- The CVC Exchange currently utilizes technology that facilitates the automated sharing of data needed by the Home College once a request for financial aid under the consortium agreement has been received. Data is shared in the form of an automated email notification, as well as enrollment reports accessible through the Exchange Admin Dashboard. Both the email and reports contain all relevant student enrollment and course data needed by the Home College financial aid office, including Student name, CCCID, Teaching College name, Teaching College ID, course title, # of units, course start/end date, Teaching College financial aid contact information.

### **Future Risk Mitigation Strategies**

- CVC will confirm that each Home College signing the CVC Federal Financial Aid Consortium Agreement has made the information publicly available on their website.
- CVC implementations will require evidence of the public notification of the existence of the CVC Federal Financial Aid Consortium Agreement prior to a college being launched in the Exchange as a Teaching College.
- CVC will include in all implementation training and marketing materials notification to colleges about making the CVC Federal Financial Aid Consortium Agreement information available to students as an audit requirement.

### **Compliance Reference Documents:**

- [Written Agreements Between Schools Consortium Agreements - 2021-2022 FSA Handbook, Vol. 2, pp 41-42](#)
- [CVC Federal Financial Aid Consortium Agreement](#)

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## **CALCULATING & AWARDING FINANCIAL AID**

### **C. FEDERAL & STATE COMPLIANCE**

When a student enrolled in a program at a Home College takes classes under a Consortium Agreement at a Teaching College, his/her financial aid is based on the aggregated units. The U.S. Department of Education does not mandate whether the Teaching College or the Home College - or both - disburse a student's financial aid. That is determined by the Consortium Agreement.

Under the CVC Federal Financial Aid Consortium Agreement, the Home College (*i.e. the college awarding the financial aid*) will manage the student's official records, including the student's FAFSA information. Additionally, the Home College is responsible for disbursing all federal aid and Cal Grants. However, any fee waivers the student qualifies for at a Teaching College will be administered by the Teaching College to offset student account charges. This system requires clear and close communication between the student, the Home College and the Teaching College. If the student does not fully register at the Teaching College, some student record data required to determine eligibility for a fee waiver at the Teaching College may not be available. Although the Home College can increase the student's federal student aid budget by the expenses associated with the course at the Teaching College, the Home College should require verification of additional fees before adjusting the CoA. (*See CoA Section*)

#### **Compliance Risks**

- Home Colleges do not have sufficient student data to verify a student is taking a financial aid-eligible course from a Teaching College.
- Teaching Colleges run the risk of awarding federal aid which is not allowed under the conditions of the CVC Federal Financial Aid Consortium Agreement.
- Completed grades for courses taken at a Teaching College may not be available, or available in a timely fashion, for accurate SAP monitoring and R2T4 calculations

#### **CVC Current Risk Mitigation Strategies**

- The CVC Exchange currently utilizes technology that allows for the automated sharing of data needed by the Home College to make a determination of financial aid eligibility once it receives a student's request for aid under the consortium agreement. Data is shared in the form of an automated email notification, as well as via enrollment reports accessible through the CVC Admin Dashboard. Both the email and the reports contain all relevant student



enrollment and course data needed by the Home College financial aid office. This includes the following information: Student name, CCCID, Teaching College name, Teaching College ID, course name, # of units, course start/end date, and Teaching College financial aid contact information.

- The CVC Exchange currently utilizes technology allowing Teaching Colleges to attach a unique SIS identifier to all Exchange students. This identifier is an indicator to Teaching College financial aid staff that an Exchange student is requesting to aggregate their units in order to receive maximum federal aid benefits from their Home College and, as such, federal aid should not be awarded by the Teaching College (beyond the CCPG fee waivers).
- Teaching Colleges have agreed to provide course transcripts to the Home College via e-Transcripts California for all courses taken through the Exchange once a term is completed. Exchange technology sends an immediate email notification to the Home College financial aid office when a student is dropped or withdrawn from an Exchange course. Withdrawal records are also readily available in the CVC Admin Dashboard enrollment report. Home College financial aid offices have the ability to filter enrollment records to locate drop and withdrawal records for any student who requested financial aid under the consortium agreement.

### **Future Risk Mitigation Strategies**

- Due to limitations with the e-Transcript platform and a need for CCC system policy modification regarding payment for transcripts, CVC is exploring a more scalable and workable option for the sharing of transcripts.
- A notification reminder will be sent to Teaching Colleges reminding them not to process federal aid for Exchange students.
- Automated reminders will be sent to Teaching Colleges intended to prevent delays in sending e-transcripts to Home Colleges.

### **Compliance Reference Documents**

- [Student Eligibility, 2021- 2022 FSA Handbook Vol 1](#)
- [School Eligibility and Operations, 2021-2022 FSA Handbook vol 2,](#)

*\*Please note that, while we endeavor to keep these citations current, updates to the Federal Student Aid Handbook may be available on the [FSA Partner Connect website](#) .*

## **DETERMINING COST OF ATTENDANCE (COA)**

### **D. FEDERAL & STATE COMPLIANCE**

A student's financial need calculation is based on the total cost of attendance at both the Home College and Teaching College. Normally, additional tuition and fees would be reported to Home Colleges and added to the student's total COA. If the student receives a fee waiver that offsets the additional fees, either they are ignored (*since there is no actual cost*) or both the fees and the fee waiver are reported by the Teaching College to the Home College. Administrative fees, material costs, lab fees and other fees not covered by a fee waiver at the Teaching College can be reported to the Home College and the student's COA adjusted. In most cases, this would increase the student's financial aid eligibility. Financial aid officers have legal authority under the Higher Education Act (HEA) to perform Professional Judgment (PJ) adjustments to the student's financial aid information to account for changes in information, such as, loss of employment.

#### **Compliance Risks**

- If the Teaching College does not report aid distribution data to the Home College (e.g. *waivers for CCPG, enrollment fees, books and/or supplies*) for classes covered under the consortium agreement, the Home College may not accurately calculate a student's financial need.

#### **CVC Current Risk Mitigation Strategies**

- The Home College is required to contact the Teaching College directly for fee waiver information required to calculate CoA.

#### **Future Risk Mitigation Strategies**

- CVC will introduce automated notifications and/or a Teaching College fee waiver indicator in the Exchange Admin Dashboard to alert Home Colleges that the Teaching College has awarded a CCPG waiver and/or other aid. This will allow Home Colleges to accurately assess and calculate a student's financial need under the consortium agreement.

#### **Compliance Reference Documents:**

- [HEA Sec. 471 - 472](#)
- [2021- 2022 FSA Handbook Vol 3, Chapter 2](#)

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## **SYSTEM SUPPORT ISSUES**

### **E. FEDERAL & STATE COMPLIANCE**

HEA and federal regulations require that colleges have the administrative capability to manage their financial aid programs. To successfully participate in the Exchange, colleges must have the infrastructure in place to send / receive data and update and monitor student records.

#### **Compliance Risks**

- Exchange-related processes and technological limitations could potentially introduce new business processes for financial aid offices, thereby impacting workload on financial aid offices with limited staffing.

#### **CVC Current Risk Mitigation Strategies**

- The CVC Exchange currently utilizes technology that allows for the automated sharing of data between Home Colleges and Teaching Colleges. All financial aid data required by the Home College to aggregate units from the Teaching College and determine eligibility is sent via an automated email notification, in addition to being accessible through the Exchange Admin Dashboard. Available data includes Student name, CCCID, Teaching College name, Teaching College ID, course name, course units, course start/end date, and Teaching College financial aid contact information. Course completion data is also made available via e-Transcript to Home Colleges at the end of each term (*per the Federal Financial Aid Consortium Agreement*).
- The CVC Exchange has automated many of the business processes related to consortium financial aid requests thereby minimizing the workload impact on participating financial aid offices. The student request is automated within the Exchange, as are notifications of added and dropped courses. All the information required to process Exchange student financial aid requests is available to financial aid offices through automated notifications and the Exchange Admin Dashboard.

#### **Future Risk Mitigation Strategies**

- The CVC Exchange team is in the process of employing technology to share course units from the Teaching College directly into the Home College's SIS by way of a "marker" course that acts as a placeholder. As envisioned, the marker course leveraged in combination with each college's automated process for packaging financial aid, will minimize the need for manual

workflows associated with the awarding of financial aid to Exchange students.

**Compliance Reference Documents:**

- [Administrative capability and resolving conflicting information 34 CFR 668.16\(f\)](#)
- [2021-2022 FSA Handbook vol 2, p. 53 -54](#)
- [2021-2022 FSA Handbook vol 2, p. 58 -59](#)
- [IPEDS Reporting for Students in Consortium Agreement](#)

*\*Please note that, while we endeavor to keep these citations current, updates to the Federal Student Aid Handbook may be available on the [FSA Partner Connect website](#).*

## **MIS REPORTING OF FINANCIAL AID DATA & CALIFORNIA COLLEGE PROMISE GRANT (CCPG)**

### **F. FEDERAL & STATE COMPLIANCE**

The CCCCCO requires each community college district to report comprehensive student data, annually. The required financial data elements include most items from students' FAFSA forms, award amounts and types, and enrollment data from student master records, in addition to other institutional information. Home Colleges are responsible for reporting student master record data and financial aid information, including the student's FAFSA data elements, financial aid awards, award amounts, and student enrollment data. Both the Home College and the Teaching College report any awarded fee waivers. The system's logic verifies that financial aid funds, including CCPG fee waivers, are correctly awarded by comparing enrollment records and FAFSA data elements. If there is missing or incorrect data, affiliated awards are excluded from a college's report. This is significant because California's Student-Centered Funding Formula - the calculation used to determine budget apportionment for most community colleges - is partially based on the number of Pell Grants and fee waivers a college has awarded.

Both Home Colleges and Teaching Colleges can award a CCPG fee waiver for courses taken at their respective campuses. These funds can be available to pay for enrollment fees.

Most of the above information is held at the Home College. Either the information must be shared with the Teaching College or students must provide their FAFSA and other eligibility documents to both the Home College and Teaching College or add the Teaching College as a recipient to their FAFSA). Both colleges report the CCPG waivers they award in their CCPG report and the corresponding MIS elements for the student and the award in their MIS report.

#### **Compliance Risks**

- Without access to all relevant data required for MIS reporting, an Exchange college may fail to report accurate data.
- If Teaching Colleges do not report CCPG waiver and other aid information, Home Colleges run the risk of inaccurately calculating student need.

#### **CVC Current Risk Mitigation Strategies**

- Students may apply for the CCPG separately at both their Home College and Teaching College. This allows each college to individually collect and access the relevant student data required for MIS reporting.

- The CVC Exchange provides an integration for students to their CCPG application process by offering the Teaching College CCPG application as a payment option when students add courses in the Exchange.
- A second payment option allows students to complete the FAFSA/CADAA at both their Home College and Teaching College. This facilitates Teaching College processing of CCPG and other state aid utilizing a unique student identifier that prevents the awarding of federal financial aid per the Federal Financial Aid Consortium Agreement.

### **Future Risk Mitigation Strategies**

- CVC is exploring further automation that would allow for the Home College CCPG determination to be accepted by the Teaching College, and for the transfer of relevant MIS data to the Teaching College, thereby eliminating the need for students to fill out a second CCPG application.
- CVC is working to improve the messaging and payment user interface to clarify for students when it is appropriate to apply for CCPG.

### **Compliance Reference Documents**

- [CA Ed Code, Title 3, Div 7, Part 46.5, 75010 - CCPG](#)
- [AB19 - California College Promise](#)
- [CA Community College Promise Grant \(CCPG\) and Special Programs Manual \(revised October 2019\)](#)
- [CCCCO MIS Data Dictionary](#)

## **FINANCIAL AID FRAUD PREVENTION**

### **G. FEDERAL & STATE COMPLIANCE**

In order to utilize the CVC Exchange cross enrollment functionality, students must be matriculated at a Home College and provide application, residency and FAFSA documentation. It is the responsibility of Home Colleges to verify the legitimacy of each student and their records. Federal regulations require an institution to notify the Office of the Inspector General if fraud is suspected. The most frequent type of fraud comes in the form of incorrect FAFSA information entered as a mechanism to qualify for financial aid. This is an individual offense but can be a concern for the CVC Exchange. In these cases, if a Home College uncovers incorrect or fraudulent FAFSA information potentially affecting a student's fee waiver eligibility at Teaching Colleges, that information needs to be communicated. Since the Teaching College may not have the student's FAFSA in an "active" status in order to avoid automatically awarding federal aid to the student, it may not get the updated FAFSA data indicating the student is no longer eligible for fee waivers or other aid the Teaching College may have awarded.

#### **Compliance Risks**

- Teaching Colleges may not be aware that an Exchange student may be engaged in fraudulent activities and would no longer be eligible for fee waivers or other aid that the Teaching College may have awarded.

#### **CVC Current Risk Mitigation Strategies**

- All cross-enrolled students at Teaching Colleges are assigned a common cross-enrollment identifier in the Teaching College SIS. As such, the Teaching College Financial Aid Office is instructed to not provide federal aid to Exchange students until they can verify with the Home College that the student is not already receiving federal aid.
- The Exchange utilizes a bot detection service on the Exchange platform to identify, challenge, and then block any verified fraudulent automations or bots from accessing the service to create new accounts at Exchange Teaching Colleges. According to the CCCCCO, roughly 20% of all fraudulent traffic is the result of bot automations.
- Additional financial aid fraud concerns are to be addressed at the college level. As the intermediary service the CVC Exchange is not processing student financial aid information, and only interacts with student data after it has been received by the colleges. CVC, as part of its routine data and traffic analyses, is

taking note of irregularities and will share such information with both the Home and Teaching Colleges as necessary.

**Future Risk Mitigation Strategies**

- CVC should continue to alert colleges to any irregularities regarding student records if fraudulent activities are suspected.

**Compliance Reference Documents:**

- [2021-2022 FSA Handbook Vol 2, Chap. 3, p. 60](#)
- [Administrative capability and resolving conflicting information- 34 CFR 668.16\(f\)](#)
- [OIG referrals - 34 CFR 668.16\(g\)](#)

*\*Please note that, while we endeavor to keep these citations current, updates to the Federal Student Aid Handbook may be available on the [FSA Partner Connect website](#).*



## **SATISFACTORY ACADEMIC PROGRESS (SAP) TRANSCRIPT TRANSFER**

### **H. FEDERAL & STATE COMPLIANCE**

Eligibility for federal and Cal Grant aid is partially based on student Satisfactory Academic Progress (SAP), which must be reviewed each term or each year depending on each college's local policy. Generally speaking, SAP standards require students to maintain a minimum college-specific GPA of 2.0, complete a specified minimum percentage of all attempted units (*Pace*), and complete a program of study within 150% of the number of units required for the degree or certificate (*Maximum Timeframe*). Since federal aid is awarded by the Home College, it is the Home College's policies that determine a student's SAP status. Units taken at a Teaching College as part of the student's program at the Home College must be included in the Home College's SAP review of student aid eligibility, must be counted for completion, and may be counted toward the GPA calculation.

#### **Compliance Risks**

- The Home College financial aid office fails to accurately report a student's SAP status because they do not receive completed course grades or transcripts from the Teaching College.
- The Teaching College may be delayed in providing completed grades and transcripts to the Home College, thereby creating a delay at the Home College with regards to processing aid for the following term.

#### **CVC Current Risk Mitigation Strategies**

- When registering for courses through the Exchange, students consent to have their completed transcripts from the Teaching College shared with the Home College at the end of each term.
- Teaching Colleges participating in the Exchange have agreed to share student course-taking records with Home College's via e-Transcripts at the end of each term.

#### **Future Risk Mitigation Strategies**

- Due to limitations with the e-Transcript platform and policies related to payment for transcripts, CVC is exploring a more scalable and workable option for the sharing of transcript information.
- CVC will send automated reminders to Teaching Colleges to prevent delays in the sending of transcripts to the Home College.

- The CVC team will explore a reciprocity agreement between colleges which speaks to the need to have transcripts evaluated within a timely fashion once they have been received by Home Colleges.

**Compliance Reference Documents:**

- [2021-2022 FSA Handbook Vol 2, Chap. 1, p. 21,](#)
- [34 CFR 668.34\),](#)
- [34 CFR 668.16\(e\).](#)

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## **RETURN TO TITLE IV (R2T4)**

### **I. FEDERAL AID COMPLIANCE**

For students who receive federal student aid and withdraw from all of their courses prior to completing 60% of the term, their Home Colleges must follow a federal formula and timelines to calculate if these students are required to return some of the aid received.

#### **Compliance Risks**

- Home College's may fail to notify students of the required timeline for returning funds if they do not receive - or fail to act upon - withdrawal data from the Teaching Colleges.
- Home College's may fail to return funds to the U.S. DoE within 45 days of a student's withdrawal if they do not receive - or fail to act upon - withdrawal data from the Teaching Colleges.

#### **CVC Current Risk Mitigation Strategies**

- The Exchange platform sends an immediate email notification to Home College financial aid offices when a student is dropped or withdraws from an Exchange course at a Teaching College. Withdrawal records are also readily available to Home Colleges in the Exchange Admin Dashboard. Home College financial aid offices have the ability to filter enrollment records to locate drop and withdrawal records for any student who requested financial aid under the consortium agreement.

#### **Future Risk Mitigation Strategies**

- Maintain current automated withdrawal notification practices.

#### **Compliance Reference Documents:**

- [34 CFR 668.22](#)
- [2021-2022 FSA Handbook Vol. 5.](#)

*\*Please note that, while we endeavor to keep these citations current, updates to the Federal Student Aid Handbook may be available on the [FSA Partner Connect website](#) .*