

# The Maryland Higher Education Commission

# Office of Student Financial Assistance

**MHEC Independent Auditor Training** 



# **Agenda**

- I. Purpose of the Audit
- II. Sampling Size Determination
- III. MDCAPS Accessibility
- IV. Overview of Howard P. Rawlings Educational Excellence Awards Programs
- V. Auditing Requirements
- VI. Overview: Calculating Campus-Based Educational Assistance Grant
- VII. Reporting Procedures
- VIII. Independent Audit Review Resources



# **Purpose of the Audit**

The Maryland Higher Education Commission (MHEC) Office of Student Financial Assistance (OSFA) is responsible for maintaining the integrity of state grant/scholarship awarding and distribution at Maryland colleges and universities to students. Institutions are required to certify eligibility of state grant recipients prior to making awards.

To ensure the accuracy of this process, an annual independent audit known as the MHEC Independent Audit is to be conducted annually at each institution on awards granted to students who participate in the Howard P. Rawlings Educational Excellence Awards (EEA) Program which includes the Educational Assistance (EA) Grant, Guaranteed Access (GA) Grant, and Campus Based Educational Assistance Grant (CBEAG).



#### Role of MHEC-OSFA

- OSFA identifies eligible initial and renewal EA and GA applicants who have completed their FAFSA annually by the Maryland state deadline of March 1;
- OSFA performs verification of all initial GA applicants and 25% of GA renewal applicants who have submitted all required documentation by April 1;
- OSFA makes awards to students who are eligible for the EA and GA program; and
- CBEAG funds are allocated to the institution, and the institution selects and awards eligible students.



#### **Role of MHEC-OSFA**

The institution is required to perform certain processes in MDCAPS which include but are not limited to:

- Reporting Institutional Student Information Record (ISIR) based on federal verification performed on selected EA recipients;
- Certify the eligibility of EA and GA recipients per semester in MDCAPS based on program eligibility requirements which include but are not limited to full-time enrollment, Maryland residency demonstrated by the student and parent (if dependent), degree-seeking status, and compliance of Satisfactory Academic Progress (SAP); and
- Updating MDCAPS of all CBEAG recipients awarded by the institution in a given year.



#### Role of the Institution

- The institution's Financial Aid Office is responsible for enforcing both the General Policies and the individual program requirements in accordance with Title 18 of the Education Article, Annotated Code of Maryland, and each program's guidelines and or regulations; and
- All institutions must follow the procedures outlined in the Financial Aid Officer's manual provided by MHEC on an annual basis as well as the Maryland College Aid Processing System (MDCAPS) Financial Aid Officer's User Manual, which is available from the "Help" link in MDCAPS.



#### Role of the Auditor

- The institution's designated auditor(s) must gain access to the Maryland College Aid Processing System (MDCAPS);
- The institution's designated auditor(s) must gain access to the institution's records for each student being reviewed; and
- The institution's designated auditor(s) must compare institutional records to the actual certification of each awarded student's eligibility in MDCAPS.



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#### What is MDCAPS?

- The Maryland College Aid Processing System (MDCAPS) is the financial aid system that allows OSFA to process State scholarship applications and allocate funds to eligible applicants; and
- MDCAPS is utilized by students, institutions, legislators, and OSFA to determine and verify the final eligibility of state aid recipients.





# Access to Maryland College Aid Processing System (MDCAPS)

- To utilize MDCAPS, the Auditor must obtain MDCAPS login information from OSFA;
- To obtain access, the Auditor must first complete the MDCAPS User Agreement and Contact Information Form;
- MHEC will notify the auditor(s) within 2 business days that access to MDCAPS has been granted; and
- MDCAPS access will be view only for the auditor reviewing each institution and access to MDCAPS will be limited to the duration of each specific audit.



# Sample MDCAPS User Agreement

Complete and submit the below MDCAPS User Agreement form.

MDCAPS User Agreement for Independent Auditor Participation

("the Independent Auditor") and

(the "Institution") represent and agree that the Independent Auditor has been retained by the Institution to perform an independent audit ("Audit") of the Institution's state-based financial aid programs pursuant to Subtitle 8, Title 14B of the Code of Maryland Regulations ("COMAR"). The Independent Auditor agrees that the access to the online Maryland College Aid Processing System ("MDCAPS) of the Maryland Higher Education Commission ("MHEC"), Office of Student Financial Assistance ("OSFA"), is subject to all of the terms and conditions of this MDCAPS User Agreement for Independent Auditor Participation ("User

#### Use of MDCAPS

Agreement").

#### The Independent Auditor shall:

- Follow all policies and procedures in the MHEC Independent Auditor Training Manual, a copy of which has been received by the Independent Auditor, and any other policies, procedures, and regulations adopted by MHEC/OSFA for administration of student financial assistance and use of MDCAPS, including but not limited to:
  - Following all requirements for reporting to MHEC;
  - Reviewing financial aid awarded to a student's account, including the award amount, acceptance by the student, and payment to the Institution by MHEC; and
  - Protecting student privacy in accordance with the law;
- Participate in training regarding administration of student financial assistance and MDCAPS as may be requested by MHEC/OSFA or the Institution; and

Contact MHEC or the Institution's chief financial aid officer if there are any questions about use of MD CAPS or about terms and conditions of program participation.

#### Administration



#### **Contact Information Form**

In addition to the MDCAPS User Agreement, each institution must complete the Contact Information form indicating the contact information of the Auditor(s) designated to perform the institutional audit.



Larry Hogs Govern Boyd K, Rutherfo Lt. Govern Anwer Hass Chairpersc James D. Fielder, Jr., Ph. I

#### Office of Student Financial Assistance State Aid Independent Audit Review

Contact Information

Institution:		
Date(s) Audit Performed:		
Name of Institutional Representative: _		
Phone Number:	_ Email:	
Independent Auditor:		-
Name of Auditor's Representative:		_
Phone Number:	_ Email:	-
Name of Auditor's Representative:		-
Phone Number:	Email:	-

Additional pages may be used if more than two Auditor's Representatives have been authorized by the Institutio



# Howard P. Rawlings Educational Excellence Awards Program: *An Overview*



# Howard P. Rawlings Educational Excellence Awards (EEA) Program

The Howard P. Rawlings Educational Excellence Awards (EEA) programs include the following need-based grants:

- Educational Assistance Grant;
- Guaranteed Access Grant; and
- Campus Based Educational Assistance Grant (CBEAG).



#### **Educational Assistance Grant**

#### **Program Requirements**

The Howard P. Rawlings Educational Assistance (EA) Grant provides postsecondary financial assistance to eligible in-state students who are current high school seniors and/or students who will enroll as full-time, degree-seeking undergraduates at a Maryland college or university.

- FAFSA must be filed annually by March 1;
- All initial applicants are ranked by Expected Family Contribution (EFC); and
- An EA Grant is determined by student need as determined by OSFA.



#### **Guaranteed Access Grant**

#### **Program Requirements**

The Howard P. Rawlings Guaranteed Access (GA) Grant provides postsecondary financial assistance to eligible in-state students currently enrolled as high school seniors who:

- Have filed the FAFSA by March 1;
- Will complete a college preparatory program;
- Maintain High School GPA of 2.5;
- Meet annual income requirements determined by MHEC; and
- Submit all required GA documentation requested by MHEC by April 1 of each year.

<u>Note</u>: The amount of the GA Grant equals 100 percent of the student's financial need.



# **Campus Based Educational Assistance Grant**

#### **Program Requirements:**

The Howard P. Rawlings Campus Based Educational Assistance Grant (CBEAG) provides postsecondary financial assistance to eligible instate students who are:

- Current high school seniors and full-time, degree-seeking undergraduates;
- FAFSA must be filed <u>after March 1</u> each year; and
- A CBEAG award is determined by the institution.



# Sampling Size Determination: The Process

Upon receiving access to MDCAPS the MHEC Compliance Officer will provide the Auditor with the following reports for the respective aid year applicable to the institution being audited:

- 1. The Sampling Size template;
- 2. A standard report of the total number of Guaranteed Access (GA) Grant recipients awarded/paid;
- 3. A standard report of the total number of Educational Assistance (EA) Grant recipients **selected** for verification by MHEC who were awarded/paid;
- 4. A standard report of the total number of Educational Assistance (EA) Grant recipients **not** selected for verification awarded/paid; and
- 5. A standard report of the total number of Campus Based Educational Assistance Grant (CBEAG) awarded.



# Sampling Size Determination (cont'd)

#### **How to Determine the Sample Sizes:**

If population > 100, use HYPGEOM.DIST formula

If population > 10 but < 100, select 10% of total

If population < or = 10, select all records



# **Sampling Size Determination Worksheet**

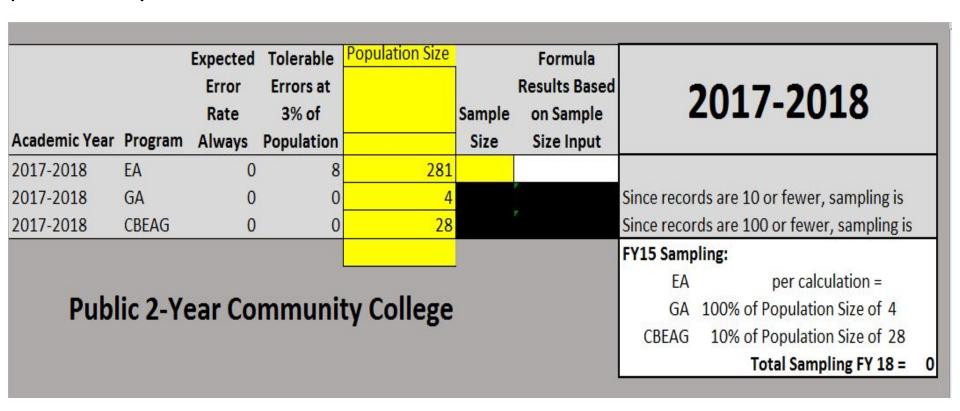
Below is the sample size worksheet that will be provided by MHEC to the Independent Auditors once they have obtained access to MDCAPS.

Academic Year	Program	Expected Error Rate Always	Tolerable Errors at 3% of Population	Population Size	Sample Size	Formula Results Based on Sample Size Input	2017-2018
2017-2018	EA	0	0				Since records are 100 or fewer, sampling is
2017-2018	GA	0	0		1	5	Since records are 10 or fewer, sampling is
2017-2018	CBEAG	0	0				Since records are 10 or fewer, sampling is
Public	2-Ye	ar Con	nmunity	Colleg	е		FY15 Sampling:  EA 100% of Population Size of 0  GA 100% of Population Size of 0  CBEAG 100% of Population Size of 0  Total Sampling FY 18 =



# Sampling Size Determination Worksheet cont'd

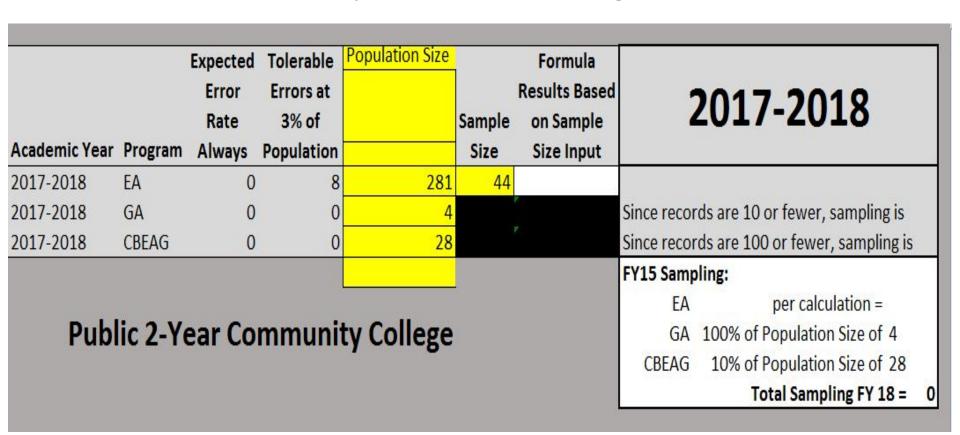
Enter the population sizes for each EEA Program noted on the report(s) provided by MHEC to the Auditor.





# Sampling Size Determination Worksheet cont'd

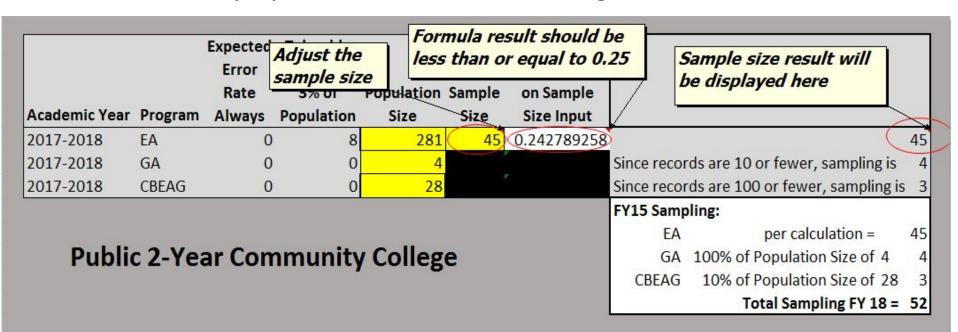
Enter an estimate of the sample size for the EA Program.





# Sampling Size Determination Worksheet cont'd

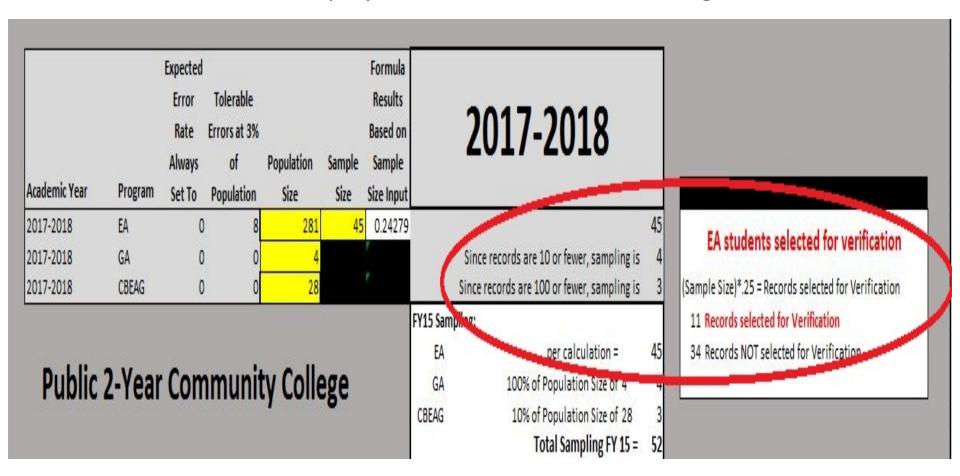
- Adjust the EA Program Sample Size to yield a Formula Result value that is less than or equal to 0.25; and
- The total Sample Size (the number of record to be reviewed) result will be displayed in the next cell to the right.





# Sampling Size Determination Worksheet cont'd

Detailed results will be displayed in the next cells to the right.





# **Auditing Requirements**

#### **Institutional Policies**

The review of student records by the auditor should be performed with a view toward ensuring that the institution has complied with its own stated policies regarding the following policy areas:

- RESIDENCY
- VERIFICATION
- SATISFACTORY ACADEMIC PROGRESS (SAP)
- STUDENT HOUSING



# **Auditing Requirements (cont'd)**

The following areas of review and corresponding documents noted below (as applicable) must be reviewed by the independent auditor for each student record to ensure the institution properly confirmed the students' eligibility for the award:

- RESIDENCY (i.e. Admissions documentation, state license, or other documents used by the institution to determine Maryland residency)
- DEGREE PROGRAM (i.e. Academic transcript, class schedule, etc.)
- ENROLLMENT STATUS (Academic transcript, class schedule, add/drop slips, etc.)
- SAP STATUS (Academic transcript, SAP forms/appeals collected from the student by the institution)
- VERIFICATION (Documentation required for each V-group as outlined in Title IV regulation)



# **Auditing Requirements (cont'd)**

- HOUSING STATUS (billing/housing statements, student leases, documentation from institution's Housing Office, etc.)
- ISIR or STUDENT AID REPORT (SAR) (Copy of ISIR or SAR upon which the student was <u>paid</u> the state award
- CAMPUS BASED EAG CALCULATIONS (if institution awarded funds for that program)
- Any other documents relating to each student's enrollment including the school enrollment contract, records of disciplinary action, drop slips, etc.



# **Auditing Requirements (cont'd)**

For more information on acceptable documentation that may be collected from the institution for auditing purposes, please reference the *Independent Audit Review Manual*.

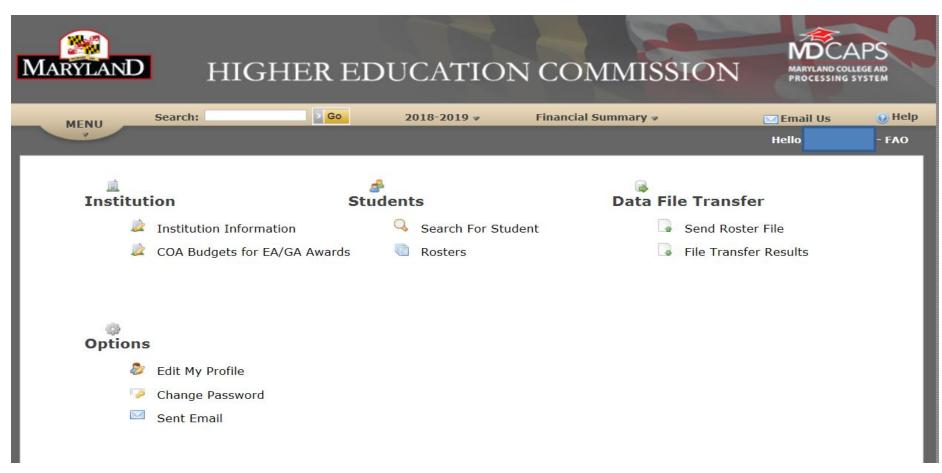
The below chart provides the page numbers which you may reference in the IAR manual:

Acceptable Documentation	IAR Manual Page Number		
Residency	25-28		
Degree Program	34		
Enrollment Status	29-30		
SAP Status	31		
Verification	38-41		
Housing	36-37		
ISIR or SAR Reporting	41		



# **Auditing Requirements (cont'd)**

Below is a screenshot of the MDCAPS home screen once logged in:

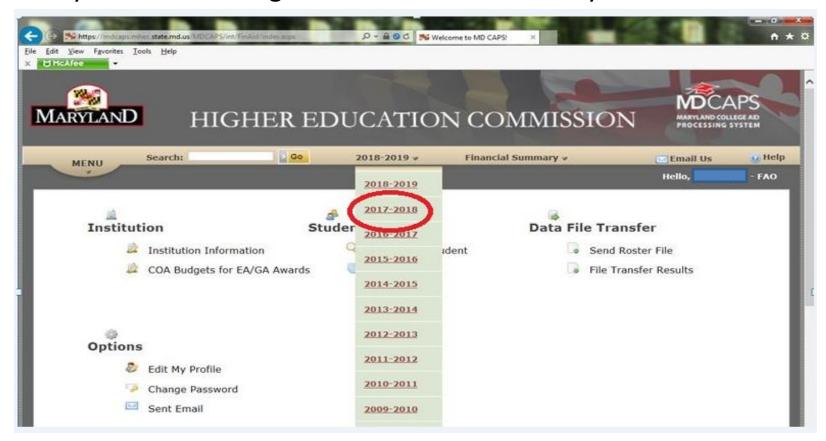




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# **Auditing Requirements (cont'd)**

Click on the 2018-2019 year down arrow and select the 2017-2018 year to ensure you are reviewing records from the correct year.





# **Auditing Requirements (cont'd)**

After selecting the correct academic year, enter the student's MHEC ID number as noted on the spreadsheet, and hit the GO button or the Enter key on your keyboard.

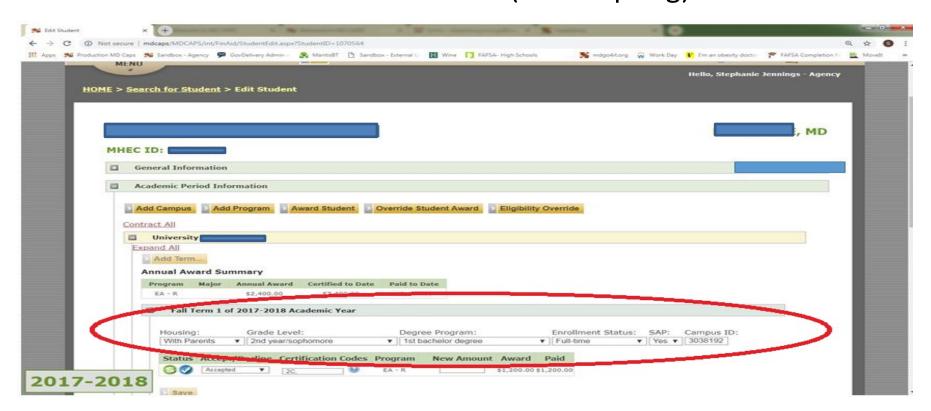




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# **Auditing Requirements (cont'd)**

Next, go to the Academic Period Information section and review the certification information for each term (Fall & Spring).





# **Auditing Requirements (cont'd)**

#### **Housing Certification Requirements:**

- The housing status for students must be updated in MDCAPS to reflect the student's housing as determined by the institution's policy
- MHEC defines a student's housing in one of the following ways:
  - On Campus- residing in on campus housing where charges are directly applied by the institution;
  - Off Campus- residing in off campus housing, not with a parent; and
  - With Parent- residing off campus with a parent.
- Schools are required to certify the housing status for each student receiving a State award(s). For more information on acceptable documentation that may be collected to verify the housing status of each student, refer to page 36-37 of the IAR manual.

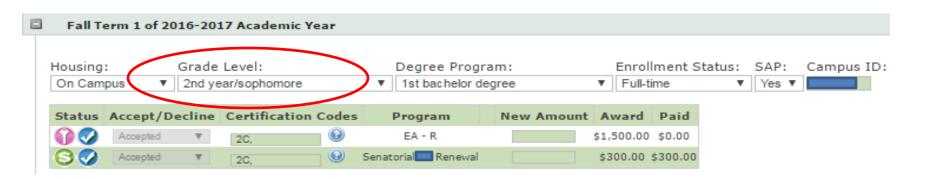




# **Auditing Requirements (cont'd)**

#### **Grade Level Certification Requirements:**

The grade level should be certified as determined by the institution's policy.

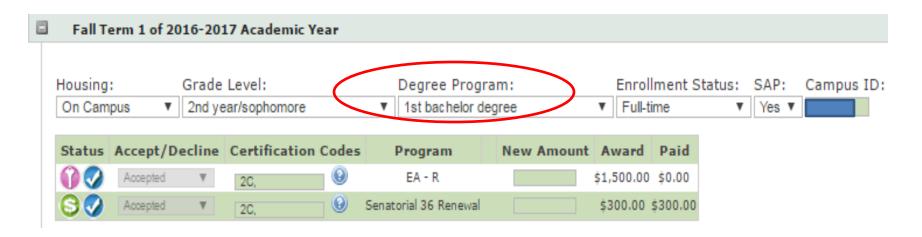




# **Auditing Requirements (cont'd)**

#### **Degree Program Certification Requirements:**

The degree program should be certified based on the degree status of the student at the time of certification.





# **Auditing Requirements (cont'd)**

#### **Enrollment Status Certification Requirements:**



<u>Note</u>: MHEC awards and disburses scholarships on a semester basis. Therefore, if an institution follows a trimester/quarter calendar it must determine the appropriate distribution of awards according to the established Billing Roster cycles.



### **Auditing Requirements (cont'd)**

#### **Enrollment Status Certification Requirements:**

The enrollment status should be certified at the time that the student's eligibility can be confirmed.

MHEC defines a student's enrollment in one of the following ways:

	Undergraduate Students	Graduate Students
Full-time	12+	9
Three-quarter time	9-11	N/A
Half-time	6-8	6-8
Less than half-time	<6	<6



### **Auditing Requirements (cont'd)**

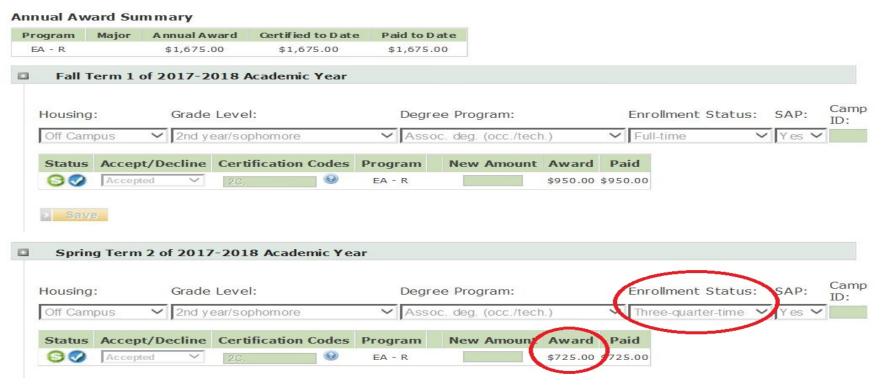
#### **Enrollment Status Certification Requirements:**

- A student may appeal for less than Full-time enrollment and qualify for a prorated award under certain circumstances;
- If enrolled in a qualifying program which requires clinical training, as documented by the institution (e.g. Nursing); or
- Other special circumstances, (e.g. documented disability), as approved by OSFA.



### **Auditing Requirements (cont'd)**

Enrollment Status Certification Requirements for less than 12 credits (if appeal was approved by OSFA):



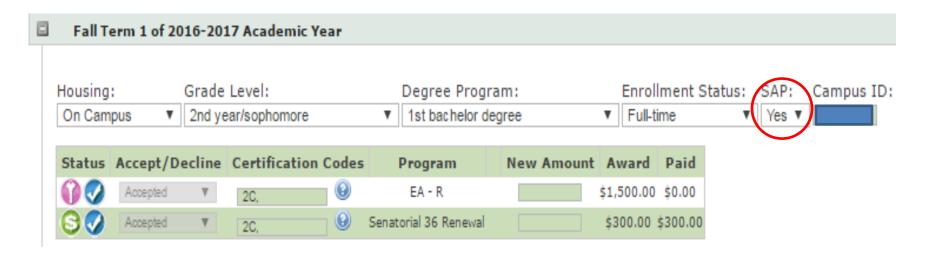
**Note**: Confirm that prorated award amount is displayed as **Award**.



# **Auditing Requirements (cont'd)**

#### **SAP Certification Requirements:**

SAP should be certified as determined by federal regulations in accordance with the institution's policy.





# **Auditing Requirements (cont'd)**

#### **Proper Usage of Certification Codes**

Institutions are required to report the appropriate certification codes in MDCAPS in each student record.

- System Assigned cancellation codes are automatically applied to the student's record once the institution has properly updated the student's Housing, Grade Level, Degree Program, Enrollment Status and SAP.
- To certify or cancel an award for any other reason, the institution must enter the appropriate code(s) into the certification box or click the for a full listing of all cancellation codes.





### **Auditing Requirements (cont'd)**

#### **Examples of Certification Codes**





### **Audit Review Requirements (cont'd)**

Institutions are required to report ISIR information in MDCAPS for EA recipients under the following circumstances:

If a student was an on-time applicant and selected for verification;

#### OR

 If a student was not selected for verification and was an on-time applicant and there is an increase or decrease in the student's EFC (Estimated Family Contribution).

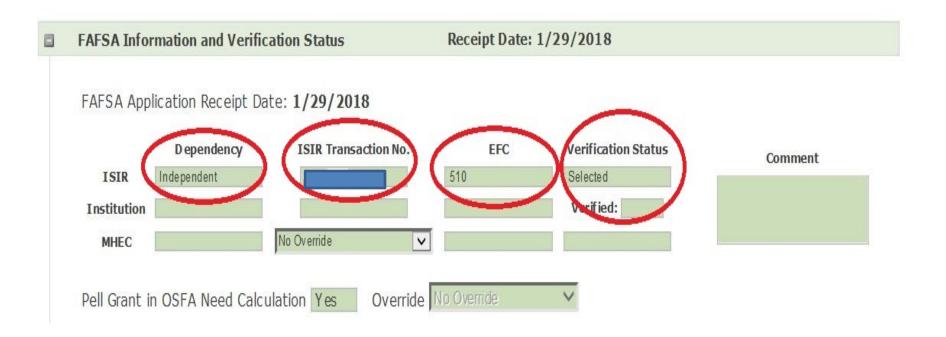
\* Note all institutions must update the Institutional line in MDCAPS for students selected for verification regardless if the EFC changes.



# **Auditing Requirements (cont'd)**

#### **ISIR (FAFSA) information:**

The ISIR data should be reviewed as follows:





# Overview: Calculating Campus-Based Educational Assistance Grant



### **Campus Based Educational Assistance Grant**

 The CBEAG program is a decentralized program, whereby institutions are allocated funds by MHEC and institutions then make award determinations at the campus level; and

 Auditors are required to review and determine the institution's accuracy in calculating CBEAG award amounts.



### **Campus Based Educational Assistance Grant**

Since the CBEAG program is decentralized, the institutions make the awards to eligible students.

Auditors are required to review and determine the institution's accuracy in calculating CB-EAG award amounts.

When determining award eligibility of the Campus Based Educational Assistance Grant program (CBEAG), institutions must use the following formula:

**OSFA Cost of Attendance** 

- FFC
- +/- COLA adjustment
- Pell Grant Award
- Other awards (if listed below)

= OSFA Adjusted Need

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### Campus Based EAG (cont'd)

- The Cost of Attendance (COA) is the cost of attendance reported by institutions into MDCAPS for the given academic year; and
- The COA to be used when calculating a Campus Based EAG award should not be adjusted to reflect recent adjustments in tuition and fees. The COA budgets can be found in MDCAPS under the **INSTITUTION** menu.

**EFC**: The student's expected family contribution, as determined by the FAFSA.



### Campus Based EAG (cont'd)

The **Cost of Living Adjustment (COLA)** is used for the CBEAG program to adjust for variable costs associated with the student's area of residence, as described below:

<u>COLA adjustment derived by</u>: EFC x adjustment factor = COLA. The result is added to the calculation, as listed above. However, when/if the adjustment factor percent is below 1.00 (e.g.: 0.96), then the auditor would subtract the COLA from the calculation. For the 2017-2018 academic year, all adjustment factors are above 1.00.

- when the first three digits of the zip code is greater than 209 but less than 217, the
   Baltimore adjustment is used: 1.05
- when the first three digits of the zip code is greater than 199 but less than 210, the
   Washington adjustment is used: 1.17
- all other zip codes use the "other" adjustment: 1.03

Multiply EFC x adjustment factor. The EFC should then be subtracted from the result. That is the COLA figure that will be used in the calculation of need. For example, an EFC of 4,000 x 1.05 factor would result in a figure of 4200. The difference between the new figure and the EFC is 200. **This is your COLA figure.** 



# Campus Based EAG (cont'd)

**Pell**: The Pell Award that the student is receiving.

The student **MUST BE RECEIVING** a Pell Grant award in order to be considered for a Campus Based EAG award.

Other Awards are: The Maryland Workforce Shortage Student Assistance Grant. When calculating a Campus Based EAG award, this award must be deducted from the student's COA when determining the student's adjusted need. You only need to subtract this award for the 2017-2018 academic year. You would not deduct SEOG, FWS, Perkins, or other State funds when determining a student's eligibility for Campus-Based EAG.

**OSFA Adjusted Need**: This is the amount of need that you will use when determining a student's Campus Based EAG award.

<u>Percent of Need:</u> 2017-2018 academic year: the type of institution the student attends will determine the percent of need. The percent of need for 2- and 4-year independent and 4-year public institutions is 40%. The percent of need for 2-year public institutions (community colleges) is 60%.



### Campus Based EAG (cont'd)

### Percent of Need: 2017-2018 academic year:

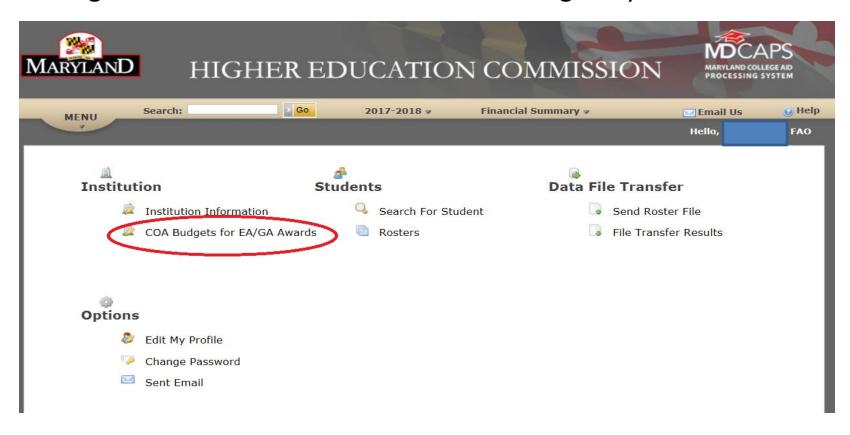
 The type of institution the student attends will determine the percent of need; and

 The percent of need for 2- and 4-year independent and 4-year public institutions is 40%. The percent of need for 2-year public institutions (community colleges) is 60%.



#### **OSFA Cost of Attendance**

The institution's OSFA Cost of Attendance is to be used as the basis for determining a student's need and CBEAG award eligibility.





### **OSFA Cost of Attendance (cont'd)**

The Auditor should access the COA Budgets for EA/GA Awards screen to view the results for the specific institution (example below); and

The Auditor must calculate the student's CBEAG eligibility using the Cost of Attendance associated with the student's housing status.

	With Parents	On Campus	Off Campus
Tuition and Mandatory Fees	\$5,118.00	\$5,118.00	\$5,118.00
Room and Board	\$0.00	\$0.00	\$0.00
OSFA Allowance	\$3,200.00	\$3,200.00	\$5,100.00
OSFA Cost of Attendance	\$8,318.00	\$8,318.00	\$10,218.00



### Campus Based EAG (cont'd)

### **Numerical example:**

	COA	10,218
-	EFC	- 4,000
+	COLA Adjustment Figure	+ 200
-	Pell Grant	- 1970
-	Other Scholarships (i.e. WSSAG)	- 3,000
=	OSFA Adjusted Need	1,448

Multiply 1,448 by 60% (if a 2-Year institution), and the student would get an award of \$900 (rounded up from 868).

**Note:** The award amount is rounded to the nearest \$100



### **Campus Based EAG Calculator**

Below is a sample spreadsheet that may be used to calculate CBEAG eligibility:

CBEAG Calo			Independent and					
	4 Year P	ublic Insitu	tions					
				ou!			Correct	
				- Other	= OSFA		CB/EAG	
				OSFA	adjusted	OSFA Need	Award	
OSFA COA	- EFC	+ COLA	- Pell	awards	need	X .40	Amount	ISIR date
14,010	646	19	5,270	0	8,113	3,245	3,000	6/23/2017
*ISIR DATE	MUST BE A	FTER MARG	CH 1					
CBEAG C	alculation f	or 2 Year F	ublic Insitutions					
	(Comm	unity Colle	ges)					
							Correct	
				- Other	= OSFA		CB/EAG	
				OSFA	adjusted	OSFA Need	Award	
OSFA COA	- EFC	+ COLA	- Pell	awards	need	X .60	Amount	ISIR date
10,218	4,000	200	1,970	3,000	1,448	869	900	3/5/2017
*ISIR DATE	MUST BE A	FTER MAR	CH 1					



### Campus Based EAG Calculator (cont'd)

#### Remember...

- The OSFA need is rounded to the nearest \$100 to obtain the "Correct CBEAG award amount";
- The "Correct CBEAG award amount" may not exceed \$3,000 or be less than \$400; and
- The ISIR date must be after March 1.



#### **CBEAG Last Dollar Award**

- If the Institution's CBEAG allocation was at "last dollar", then the award amount made to the student may be less than their calculated amount of eligibility;
- <u>"Last dollar"</u> means that the institution's allocation had been exhausted to the extent that an eligible student could not be awarded the full amount for which they would otherwise have been eligible; and
- With the exception of the award being "last dollar" there should be no other circumstance in which a student is not awarded their full eligibility in CBEAG.



### **Completion of the Independent Audit Review**

The Auditor shall send a final audit report to MHEC, to include:

- Itemization of any findings;
- The institution's responses to any findings; and
- The institution's corrective plans for any findings.



# **Audit Reporting Procedures**



# **Audit Reporting**

- Upon completion of the audit review, the Auditor will send a final audit report to MHEC of all areas reviewed;
- The Auditor will utilize data provided during each Audit to generate the formal audit report;
- This report is to be sent to MHEC for final review by June 1 each year to ensure accuracy of reporting; and
- Reports should be sent to the attention of:

Robert Magee, OSFA Compliance Officer

6 N. Liberty St.

Baltimore, MD 21201

<u>Note</u>: Additional information regarding reporting requirements may be found on page 10 of the Independent Audit Review Manual.



### **Reporting Procedures**

- Within 45 days of receipt of the final audit report, MHEC will send a memo to the institution verifying whether financial reimbursements (return of funds) are due back to MHEC as a result of findings identified during the audit. MHEC will notify the institution should no return of funds be assessed;
- Institutions that must remit payment based upon findings cited will be notified by MHEC of the procedures and deadlines associated with the payment process; and
- FAOs will be responsible for adjusting all student records in MDCAPS that have been assessed as a finding and resulted in payment remittance. MHEC will notify each institution as to the time and date that the adjustments are to occur.



### **Independent Audit Review Resources**

- As of June 11, 2018 the EEA Audit Regulations were approved by the Commission for Publication and are accessible online through COMAR at http://www.dsd.state.md.us/COMAR/ComarHome.html;
- The Independent Audit Review Manual has been distributed to all applicable institutions; and
- Any inquiries regarding the Independent Audit process may be sent to osfacompliance.mhec@maryland.gov.



### **Questions**



Office of Student Financial Assistance www.mhec.maryland.gov