



Consortium Agreements, Written Arrangements & Study Abroad

July 14, 2021

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July 2021



NASFAA Webinar

Consortium Agreements, Written Arrangements & Study Abroad

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NASFAA's Webinar Series Consortium Agreements, Written Arrangements & Study Abroad

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Introductions

- **Tiffany Gibbs**

- *Compliance Products Manager*
- *NASFAA*



- **Lissa Powell**

- *Training Content and Presentation Specialist*
- *NASFAA*



- **Eunice Powell**

- *Regulatory Specialist*
- *NASFAA*



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Introductions

- **Maureen “Mo” Amos**

- *Executive Director of Financial Aid, Scholarships, & Student Employment*
- *Northeastern Illinois University*



- **Lisa Koretoff**

- *Director of Financial Aid*
- *Guilford Technical Community College*



- **Jennifer Martin**

- *Director of University Financial Aid Compliance*
- *Johns Hopkins University*



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Poll

Are you involved in the consortium or contractual agreements at your institution?

- Yes
- No
- What is a consortium or contractual agreement?

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► Definitions



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Written Agreements

Consortium
Agreements

Contractual
Agreements

Eligible
Institution

Home
School

Host
School

Educational
Program

See page 33 of the handout for chart with definitions.

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Reasons for Written Agreements

- Provide access to courses at local schools
- Allow students to take courses at other schools during the summer
- Allow students to take a term or longer at another school domestically or courses applicable to the student's degree at a foreign institution
- To facilitate partnerships between schools

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Federal Requirements

- Regulations covering written arrangements can be found in 34 CFR 668.5
- Key aspects to remember:
 - The school which disburses aid must take account for all hours enrolled at each school which apply to the student's degree program
 - The disbursing school must also maintain all records which pertain to eligibility for aid
- New regulations 668.5(f),(g), and (h)



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Transfer of Credits

- The home school must accept coursework from a host school which would be acceptable for the home school's resident students
- Grades from the host school do not have to be included in the home school's GPA for the student, but the credits must count when calculating quantitative component of satisfactory academic progress (SAP)
- Coursework taken without a consortium agreement does **NOT** have to be accepted by the home school

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Poll – Study Abroad & Foreign Institutions

Can students who participate in an exchange program receive Title IV aid?

- Yes, if the coursework is part of a consortium or contractual agreement
- Yes, under any circumstances
- No, not under any circumstances
- No, coursework at a foreign institution is never considered a part of an eligible program

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Study Abroad & Foreign Institutions

Written arrangement with outside provider

Coursework taken at host school does not impact program's academic calendar

Can overlap home institution's term and/or take place over a different time period

Provided by foreign location of home institution

Academic calendar at foreign location need not align with domestic calendar

Calendar at foreign location still must meet term length requirements to be considered standard term

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Panel Discussion



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▶ Consortium Agreement Requirements



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Consortium Agreement Requirements

Home Institution Typically:

- Is the school that will grant the degree or certificate
- Determines eligibility for Title IV aid and responsible for disbursement

Host Institution:

- Provides coursework that will count toward program of study at home institution
- Reports course completion or withdrawal information to home institution

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Completing the Agreement

- No regulatory requirement dictating which school official, or office, is responsible for constructing and collecting agreement
- Agreement should contain all elements required for Title IV purposes
- Contents will vary depending on school and accrediting or state agency requirements

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Completing the Agreement

- All consortium agreements should contain:
 - ✓ The school that will grant the degree or certificate;
 - ✓ The costs associated with the period of study covered by the agreement;
 - ✓ The enrollment status at each institution entering into the agreement;
 - ✓ The school that will be responsible for monitoring student eligibility and disbursing aid; and
 - ✓ The process for determining aid amounts, monitoring SAP and returning funds in the event of a withdrawal

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Student Participation in Agreement

No requirement that student sign agreement; it is between two institutions

May be considered a best practice

At discretion of school

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Home School and Host School

- Host school may determine eligibility and disburse Title IV aid only if Title IV-eligible institution
 - If host school is not Title IV-eligible, only home school can determine eligibility and disburse
- Consortium agreement must stipulate which school will offer and disburse the funds
- Home school must agree to treat coursework at host school:
 - In same manner as if those courses were taken at the home school; and
 - As counting toward degree completion at the home school

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Accepting Coursework

- Under consortium or contractual agreement, the home school must give credit for courses taken at other school on the same basis as if it provided the training itself



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Poll Question

If the home institution considers a “D” to be a passing grade, and a student earns a “D” at the host school and a consortium agreement is in place, could the home school refuse to accept the credits for which the student earned a “D” and require that a student earn at least a “C” in order to receive transfer credit?

- The home school can refuse to accept the credits
- The home school must accept the credits
- What is this, twenty questions?

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Answer—Accepting Coursework

- The home school must accept the credits
 - The home institution may not decline a grade from the host school if that grade would be acceptable if taken at home institution

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Remedial Coursework

- No prohibition on taking remedial coursework at host institution
- Same rules apply
 - Must be admitted in eligible program of study
 - Coursework maximum of:
 - ◆ 30 semester or trimester credit hours;
 - ◆ 45 quarter credit hours; or
 - ◆ 900 clock hours

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Timing of Agreement Completion

Scenario: School received consortium agreement in April for courses taken during the previous fall term. School is standard term, semester-based school with fall/spring terms.

In this case, the school may not enter agreement retroactively. There is no provision for providing funds for the student for the previous fall term coursework taken at another institution. The agreement must be complete prior to paying student aid for coursework taken under that agreement.

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Constructing the Consortium Agreement

- Considerations:
 - Which offices need to be involved in consortium agreement development and completion?
 - What is the process flow of an agreement at your institution?
 - ◆ Who initiates the form?
 - ◆ Whose signatures must be included on the document for it to be considered complete?
 - ◆ What office maintains the document?
 - ◆ Which offices must obtain information before, during and after the enrollment period covered in the agreement ends?

Consortium Agreement Sample Forms in the
NASFAA Member-Generated Content Library
https://www.nasfaa.org/consortium_agreements

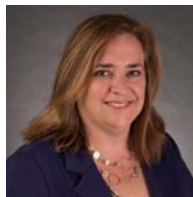
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Panel Discussion



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▶ Period of Enrollment Covered by Agreement



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Payment Period Beginning and End Dates

- Either the home school or host school may provide aid
- School that agrees to provide Title IV aid should do so based on its own academic calendar

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Concurrent Enrollment

- Whether the home school or the host school provides aid, the following is true:
 - Courses from both institutions are used to determine the student's overall enrollment status; and
 - Only courses applicable to the degree program at the home school may be counted for enrollment status and reporting
- There is no requirement that the student be enrolled for any coursework at the home school while taking classes at the host school

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Concurrent Enrollment - Brandi

Local University	Local Community College	Combined Enrollment
English 101 (3 credits)	Math 201 (4 credits)	
History 101 (3 credits)	Biology 101 (4 credits)	
6 credits	8 credits	Total Enrollment = 14 credits

*Note: Math 201 and Biology 101 are both applicable to Brandi's degree program at Local University.

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Establishing Cost of Attendance Components

- COA should reflect the period the student is enrolled at both institutions
 - Tuition and fees
 - Room and board
 - Transportation
- The home school's normal COA may not accurately reflect the costs the student may incur while enrolled under a written agreement
- Communication between all schools under the agreement is key to establishing an accurate COA

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Establishing Cost of Attendance Components – Study Abroad

- Depending on the structure of the program, the student may be charged based on:
 - The home school's costs;
 - The host school's costs; or
 - A combination of home school and host school costs

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Enrollment Requirements – Defining Enrollment Status

- The home school must agree to treat all the coursework taken at the host school the same as if those courses were taken at the home school, and that the courses taken at the host school will transfer and count toward degree completion at the home school
- Based on combined enrollment between both schools

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Poll Question

If a college processes consortium agreement, can the college require a student to be enrolled at least half-time on the campus that is providing aid?

- Yes
- No
- It depends on the terms of the agreement

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Answer—Enrollment Requirements

It depends on the terms of the written agreement. There is no regulatory requirement which specifies a minimum enrollment requirement at either school.

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Enrollment Requirements – NSLDS Reporting

- The student's enrollment status is always reported to NSLDS by the home institution
 - The home school is responsible for accurate and timely reporting to NSLDS of a student's withdrawal or graduation dates, as well as any changes in the student's enrollment status

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Enrollment Requirements – FISAP

- The disbursing school reports the student on the FISAP
 - This avoids double-counting the student

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Panel Discussion



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▶ Disbursing Title IV Aid



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Offering and Disbursing Aid

- Most often home institution
 - In some instances, easier for host school to monitor eligibility
- School that disburses is responsible for
 - Documenting how amounts were calculated;
 - Monitoring what money is disbursed; and
 - Returning funds for overpayment

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Offering and Disbursing Aid

- Enrollment status based on all courses taken that apply to eligible program
- School disbursing aid must combine enrollment of student attending more than one school under consortium agreement

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Offering and Disbursing Aid

Scenario: Casey is enrolled in an eligible program at Great University (GU), located in the mountains. She wants to spend a summer in the sun and would like to take 4 credit hours of coursework from Hawaiian Beach University (HBU) in addition to the 4 credit hours of coursework she is taking online from GU. GU has agreed to enter into a consortium agreement with HBU and will offer and disburse aid.

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Offering and Disbursing Aid

- GU combines COA information provided by HBU with their costs for the four-hour course and offers Casey aid based on enrollment in 8 credit hours
- Casey is Pell Grant-eligible and is provided a Federal Pell Grant based on half-time enrollment
- Casey has eligibility for a Direct Loan because of the combined enrollment status, so GU originates a loan and makes the disbursement

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Offering and Disbursing Aid

Federal Pell Grants, TEACH Grants and Campus-Based Aid

- Provided based on home school's academic calendar
- Disbursed based on host school's academic calendar
- Disbursed based on actual dates of enrollment

Federal Direct Loans

- Offered and disbursed based on host school's academic calendar and the student's actual dates of enrollment

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Poll—Making Direct Payments

We have a consortium agreement with another local university that owns a study-abroad facility in England. After disbursing a student's aid to their school account, can we send that money directly to the host school or must we send the funds to the student or parent borrower?

- Yes. That is how it should always be done to make sure the student pays the host school
- Yes, at the host school's request
- Yes, with signed authorization from the student and/or parent borrower
- No. The funds should be paid to the student and/or parent borrower
- It depends
- Your guess is as good as mine

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Answer—Making Direct Payments

- No
- Generally, a Title IV credit balance must be paid directly to student or parent borrower
- Funds cannot be redirected to another entity, even with written authorization

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Poll—Making Disbursements

Burt recently took a position at a new school. At his former school, students taking coursework under a consortium agreement do not receive their aid until after the period has ended and an official transcript has been received by the home school. The staff at his new institution feel that may be out of compliance. The former school chose to time disbursements in this way to avoid potential return of Title IV funds or recalculation requirements.

Is Burt's former school out of compliance?

- Yes. The school is adding disbursement requirements that are not established in Title IV regulations
- No. The school is ensuring students only receive funds they are eligible to receive
- I have no idea

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Answer—Making Disbursements

- Yes. By requiring a student to complete coursework and provide a transcript prior to disbursement, the school is adding requirements not established in Title IV regulation
- The school is out of compliance

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Making Disbursements with Consortium Agreement

- Must treat students with consortium agreement in same manner as all enrolled students
 - Disburse in substantially equal multiple payments, unless exempt based on cohort default rate (CDR)
 - Apply 30-day delayed disbursement of first disbursement of loan to “first-time, first-year” student borrowers, unless exempt

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Cash Management and Consortium Agreements

- Provide means to obtain required books and supplies by 7th day of payment period, if 10 days before payment period:
 - School could disburse Title IV aid for which student is eligible; and
 - Student would have Title IV credit balance
- Notification rules apply
 - Notify borrower when Title IV funds are credited
 - Written notification of anticipated amounts and date
 - Borrower's right to cancel

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Panel Discussion



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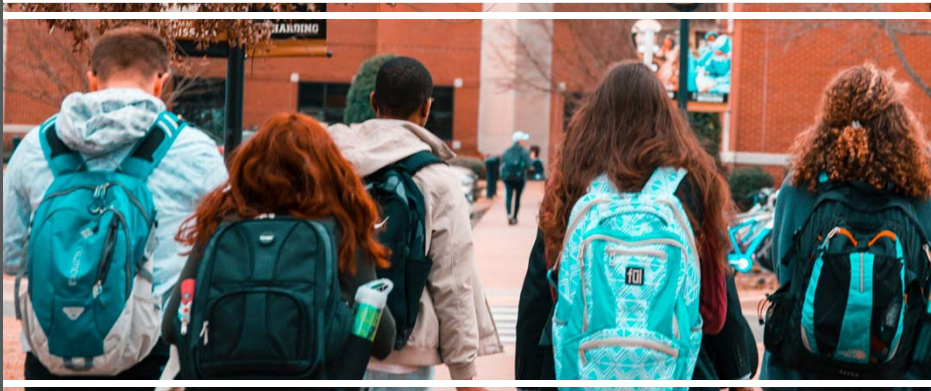


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▶ Evaluating Satisfactory Academic Progress



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SAP Notification Requirements

- SAP consumer information must include information on the:
 - Standards students must maintain to be making and maintaining SAP in a program of study for purposes of receiving Title IV aid; and
 - Criteria by which a student who failed to make SAP may re-establish her eligibility
- These requirements can be found in 668.42(c)(1) and (2) of the consumer information section of the regulations, not in the SAP regulations in 668.34

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Monitoring SAP

- Procedures for monitoring SAP should be in the agreement
- The school that provides aid is also responsible for monitoring SAP, as well as additional student eligibility requirements

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Exchanging Academic Records with School Monitoring SAP

- Communication between the schools in the consortium agreement is necessary to ensure the monitoring school has grades in a timely manner
- A timeframe or deadline for grade submittal may be included in the written agreement

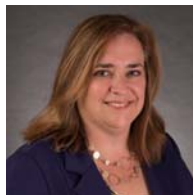
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Panel Discussion



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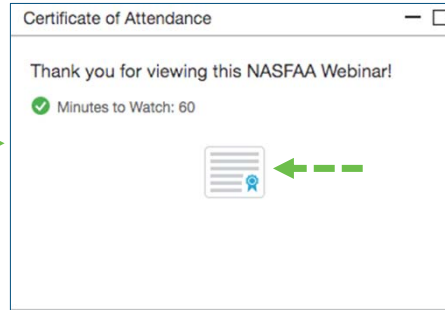




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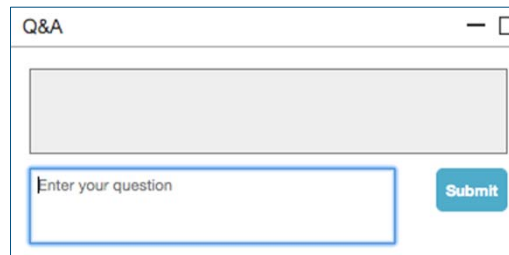
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2021-22 Course Schedule



- Fundamentals of Student Financial Aid – 7/6/21
- Return of Title IV Funds – 8/24/21
- Academic Calendars Certificate Course – 9/20/21
- Higher Education Loans Certificate Course – 10/19/21
- Verification 2022-2023 – 11/8/21
- Return of Title IV Funds – 1/10/22
- Fundamentals of Student Financial Aid – 1/11/22
- Verification 2022-2023 – 2/14/22
- Cash Management – 3/15/22
- Student Eligibility – 4/11/22
- Application Processing – 5/10/22
- Fundamentals of Student Financial Aid – 7/5/22

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Thank you for
joining us!

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Consortium Agreements, Written Arrangements, and Study Abroad: Definitions

Eligible Institution
An institution which can apply to participate in programs authorized by the Higher Education Act of 1965 (HEA). Eligible institutions include institutions of higher education, proprietary institutions, or postsecondary institutions. [See 34 CFR 600.1 , 600.2 , 600.4 , 600.5 , and 600.6]
Educational Program
A program offered by a school whereby the school provides at least some of the coursework itself. It must also meet all requirements of an “eligible program” for students to receive Title IV Aid. [600.2; 668.8] Note: A school is not considered to provide an educational program if the school does not provide instruction itself, but merely gives credit for instruction provided by other schools; examinations provided by agencies or organizations; or other accomplishments such as “life experience.”
Home School
The school where the student is enrolled as a regular student in a degree or certificate program. Typically, but not always the school which disburses Title IV aid and monitors student eligibility.
Host School
The school where the student is taking additional coursework applicable to the student’s program requirements. May be an eligible or ineligible institution, depending on the type of written arrangement.
Consortium Agreement
A written agreement between eligible institutions. [668.5(a)] There is no limit on the portion of the eligible program offered by the host school.
Contractual Agreement
A written agreement between an eligible institution and an ineligible institution. The regulations limit the amount of an educational program which may be provided by the ineligible school or organization to generally 25 percent or less of a program or, under certain circumstances, more than 25 percent but less than 50 percent of a program. [668.5(c)]



Consortium Agreements – Considerations for Differences in Academic Calendars

Here are some items to consider regarding consortium agreements when the host school and home school academic calendars do not align. While this is not an all-inclusive list, it will hopefully cover several items that are helpful.

Cost of Attendance (COA): It will be important to ensure that the COA accurately reflects the period the student will be enrolled, particularly related to room and board or transportation expenses. Your normal COA allowances used for those items may not reflect the estimated expenses the student would incur when enrolled for a longer period or in a different locale.

Academic Year: The academic year format is not affected if the coursework taken at a host school overlaps or does not take place within the same timeframe as the home school's normal terms. If the home school is the school awarding aid, it must include credits taken at the host school in the student's enrollment status for a term that occurs at a time reasonably like the timeframe for the host school's coursework.

Enrollment Status: The home school must agree to treat all of the coursework taken at the host school the same as if those courses were taken at the home school, and that the courses taken at the host school will transfer and count toward degree completion at the home school.

Awards and Disbursements: Federal Pell Grants, TEACH Grants, and campus-based aid will continue to be awarded based on the home school's academic calendar and disbursed based on the host school's calendar. Direct Loans must be awarded and disbursed based on the host school's academic calendar and the student's actual dates of enrollment.

Satisfactory Academic Progress (SAP): SAP must be evaluated by the home institution using its own standards. If a student is in a consortium agreement, a different timeframe for review may be established. The home institution must publish clear information about the intervals for students studying under a consortium agreement. Note that if a student is still engaged in coursework at the host school when the home school evaluates SAP, the coursework must be treated per the institution's policies for incomplete coursework.

Return of Title IV Funds (R2T4): If the student withdraws during the payment period or period of enrollment covered by the consortium agreement, the institution awarding and disbursing aid must complete the R2T4 calculation. In the R2T4 calculation, the denominator would consist of all the days the student was scheduled to attend at both the home and host school. The numerator would include all the days attended at either institution. Institutional charges would include all charges originally assessed to the student by either school.

Common Origination and Disbursement (COD) Reporting Requirements: The institution that awards the Title IV aid is responsible for reporting to COD. For Federal Pell Grants, Iraq and Afghanistan Service Grants (IASGs), and TEACH Grants, the reported academic year, payment periods, and disbursement dates must be those of the school that is awarding the aid. For Direct Loans, the academic year and loan period reported to COD must reflect the actual period for which the loan is being originated.

NSLDS Reporting Requirements: The student's enrollment status is always reported to NSLDS by the home institution. The home school is responsible for accurate and timely reporting to NSLDS of a student's withdrawal or graduation dates, as well as any changes in the student's enrollment status.

Reference [34 CFR 668.5](#) of the Student Assistance General Provisions regulations and Volume 2, Chapter 2 of the *FSA Handbook*.

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All webinars begin at 2:00 pm ET, unless otherwise noted, and last 60 to 90 minutes. Archives are usually available after the webinar for purchase; these archives are also free to webinar package purchasers.

Webinar Schedule for 2021-22 - See You Online!

Topic	Air Date
Panel Discussion: Cohort Default Rates	Sep 15, 2021
Always Never the Same: What's New with SAP and R2T4?	Sep 29, 2021
FAFSA Update: 2022-23	Oct 13, 2021
Center Stage: Verification 2022-23 (Extended Edition)	Oct 27, 2021
Recognizing and Eliminating Bias in Aid Office Policies And Procedures	Nov 17, 2021
Economics of Financial Aid Conversation	Dec 08, 2021
NASFAA Policy Update	Dec 15, 2021
Homeless Youth	Jan 26, 2022
Panel Discussion: 21st Century Skills for Financial Aid Administrators	Feb 23, 2022
NASFAA Quiz Show - Test Your Financial Aid Knowledge	Mar 09, 2022
Graduate and Professional School Town Hall 2021-22	Mar 16, 2022
Center Stage: Resolving Frequently Assigned Comment Codes, Flags, and Reject Codes	Mar 30, 2022
Center Stage: Summer Aid Issues	Apr 20, 2022
Hot Topic - TBD	May 18, 2022
NASFAA Policy Update	May 24, 2022
Hot Topic - TBD	Jun 08, 2022

* Complimentary for all Members. All other webinars are offered at the following rates: Site License: \$120 members/\$240 non-members/no charge for [webinar package](#) purchasers or Value Plus Members.

**The National Association of Student
Financial Aid Administrators (NASFAA)
provides professional development
for financial aid administrators;
advocates for public policies
that increase student access and
success; serves as a forum on
student financial aid issues;
and is committed to diversity
throughout all activities.**

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