2019 Administrative Burden Update Survey Instrument

The following Financial Aid Office Resource Survey is designed to assess your perceptions about financial aid office capacity, resource shortages, the potential impacts any shortages may have on students seeking financial aid, and how many additional resources are necessary, if any, to meet Department of Education standards for adequate financial counseling and administration of Title IV programs. The results of this survey will be published in NASFAA's 2020 Administrative Burden Survey Report, which will serve as a five-year update to our 2015 Administrative Burden Survey Report.

Instructions:
- This survey should take you approximately 30 minutes to complete.
- The survey includes opinion-based questions and data questions related to annual operating budget, full-time equivalent (FTE) staff, and aid applicants. To assist you in completing the survey you may view a PDF version before completing it online.
- All responses will be kept confidential and findings will only be reported in the aggregate.
- Please include information about both undergraduate and graduate student financial aid applicants and recipients during the 2018-19 award year, unless otherwise instructed.
- **Please note:** Due to the logic embedded in the survey there is no back button.

Please complete the survey by **Friday, October 11, 2019**. Any questions about the survey should be directed to NASFAA's Research Department.

INSTITUTIONAL/PERSONAL INFORMATION

How many years have you worked in the financial aid field?
- Years in financial aid_____

How many years have you worked at your current institution's financial aid office?
- Years in current office_____

Please select the program format(s) for which financial aid is awarded? (Select all that apply).
- Semester
- Trimester

- Quarter
- Non-term
- Non-standard term

For the following award years, how many admitted applicants did your institution have overall for any form of aid (including federal, state or institutional)? (Please enter only numbers; do not use comma's (,), decimals (.), etc.)
- 2013-14 Number of applicants_____
- 2018-19 Number of applicants_____

From which financial aid programs do your students receive funds (check all that apply)?
- Federal Direct Loan
- Federal Pell Grant
- Federal Work-Study
- Federal Supplemental Educational Opportunity Grant
- Federal Parent PLUS Loan
- Federal Grad PLUS Loan
- Federal Teacher Education Assistance for College and Higher Education Grant
- Institutional Loan
- State Aid (e.g., grants, loans, scholarships)
- Institutional Gift Aid (e.g., scholarships, grants, fellowships, tuition-waivers)
- Aid from External/Non-government Sources (e.g., grants, scholarships, fellowships)
- Private (alternative) Loan
- Emergency Aid
- Other (please specify)_____

In general, how would you describe the basic *financial aid* literacy of your matriculating students?
- Very limited
- Somewhat limited
- Somewhat sophisticated
- Very sophisticated

In the last five years, how has the average effort in time and resources your financial aid office devotes to an aid applicant changed?
- Greatly Increased
- Somewhat Increased
- Remained Constant
- Somewhat Decreased
- Greatly Decreased

For the following award years what was the total amount of aid your institution disbursed (including federal, state, and institutional)? (Please enter only numbers; do not use commas (,), decimals (.), etc.)

- 2013-14 Total Dollar Amount_____
- 2018-19 Total Dollar Amount_____

Please identify the number of FTE staff in the financial aid office in each of these categories
- Directors, Including Asst. and Assoc._____
- Counselors_____
- Administrative/Support Staff_____
- Student Staff (e.g., work-study/graduate students)_____
- Compliance Officer_____
- IT Computer Support_____
- Other_____

How has your staff size changed over the past five years?
- Greatly Increased
- Somewhat Increased
- Remained Constant
- Somewhat Decreased
- Greatly Decreased

Is your financial aid office the primary administrative unit responsible for Title IV regulatory compliance in areas not directly related to student financial aid processing?
- Yes
- No

> <<If Yes>> What areas below, not directly related to student financial aid processing is your financial aid office the primary administrative unit responsible for Title IV regulatory compliance (check all that apply)?
> - Campus crime
> - Fire safety
> - Textbook pricing
> - Drug abuse prevention program
> - IPEDS
> - Athletics reporting
> - Other (please specify)

Does your financial aid office provide all staff involved in financial aid activities with technical and software support training, if applicable?
- Yes
- No

RESOURCES

This section of the survey asks for your perceptions about your office's capacity to maintain quality financial aid services, the types of constraints you currently face, if any, and those factors that you believe may have caused any perceived shortages.

Federal regulations require that schools provide an "adequate number of qualified persons to administer the Title IV, HEA programs in which the institution participates" (34 C.F.R. §668.16(b)(2)) and provide "adequate financial aid counseling to eligible students who apply for Title IV, HEA assistance" (34 C.F.R. §668.16(h)). Below you will find lists of factors that the Secretary of Education considers with regards to meeting these regulations. Please keep these lists in mind as you complete this section of the survey.

The Secretary considers the following factors to determine whether an institution uses an adequate number of qualified persons to administer the Title IV, HEA programs in which the institution participates—

(i) The number and types of programs in which the institution participates;
(ii) The number of applications evaluated;
(iii) The number of students who receive any student financial assistance at the institution and the amount of funds administered;
(iv) The financial aid delivery system used by the institution;
(v) The degree of office automation used by the institution in the administration of the Title IV, HEA programs;
(vi) The number and distribution of financial aid staff; and
(vii) The use of third-party servicers to aid in the administration of the Title IV, HEA programs.

In assessing whether a school has adequate financial aid counseling, the Secretary considers the following information—

(1) The source and amount of each type of aid offered;
(2) The method by which aid is determined and disbursed, delivered, or applied to a student's account; and
(3) The rights and responsibilities of the student with respect to enrollment at the institution and receipt of financial aid. This information includes the institution's refund policy, the requirements for the treatment of Title IV, HEA program funds when a student withdraws under §668.22, its standards of satisfactory progress, and other conditions that may alter the student's aid package.

To what degree does your office face resource shortages (e.g. human, technological) that affect your capacity to maintain what you perceive to be quality financial aid services and comply with all federal/state/institutional requirements?
- No Shortage
- Some Shortage (Does not affect level of services)
- Moderate Shortage (Affects level of services during peak processing periods)
- Severe Shortage

In your opinion, does your institution have a shortage of human or other resources to provide "adequate administration of Title IV funding programs" as defined by federal regulations?
- Yes

- No

In your opinion, does your institution have a shortage of human or other resources to provide "adequate financial aid counseling" as defined by federal regulations?
- Yes
- No

In your opinion, is any shortage transitional (e.g., a one-time operational adjustment) or permanent (i.e., ongoing)?
- Transitional
- Permanent

To what extent do you believe that last-minute congressional action (e.g., federal budget) adversely affects both financial aid office workload and students' aid decision making?

	No impact	Little impact	Some impact	Significant Impact
Financial aid workload				
Students' aid decisions				

If you have any particular comments related to last-minute congressional action that you would like to share, you may do so below.

Do resource shortages occur throughout the financial aid calendar/award year or are they concentrated at particular time periods in the financial aid calendar?
- Ongoing
- Concentrated

This Question is Conditionally Shown if: (Answer above is 'Concentrated')
If you answered concentrated to the previous question, please select the periods of the calendar most affected (you may select more than one).
- January
- February
- March
- April
- May
- June
- July
- August
- September

- October
- November
- December

Please select from the list below the constraints your office faces. For each, please tell us if you think the shortage is temporary or longer-term.

	Drop Down: Temporary Long Term Not a shortage
Not enough administrative/support staff	
Not enough counseling staff	
Significant staff turnover	
Inefficient organizational structure	
Insufficient use of 3rd party servicers	
Out-of-date/insufficient technology	
Lack of technology training	
Limited operating autonomy	
Too many responsibilities outside of core mission (e.g., non-financial aid compliance)	
Limited operating budget	
Other (box for text)	

What factors do you think best explains why you face these constraints? For each one you identify, please indicate whether you think this is a major or minor cause.

	Drop Down: Major Minor Not a cause
State budget	
Institutional budget	
Greater regulatory/compliance workload in general	

Greater number of students with financial aid need	
Increases in federal verification	
Increases in professional judgment requests	
Insufficient Administrative Cost Allowance	
Lack of qualified applicants for open positions	
Cost associated with third party support services	
Bureaucratic inefficiency	
Title IV requirements unrelated to financial aid (admin. burden)	
Other (box for text)	

IMPACT ON STUDENTS

One of NASFAA's primary concerns is the impact of financial aid office resource constraints on student support. This section of the survey asks you to identify specific impacts that any resource constraints have had on the quality of financial aid services delivered.

To what extent have resource shortages affected your office's ability to meet its obligations to students?
- No Impact
- Little Impact
- Some Impact
- Significant Impact

In your opinion, to what extent is your office capable of engaging in the types of activities that you believe best serve The needs of your particular students?
- Very Limited Capability
- Somewhat Limited Capability
- Sufficient Capability

In your opinion, are any processes and/or activities preventing you from best serving the needs of your particular students? If so, please list.

Please indicate to what extent each of the following functions have suffered a direct negative impact by shortages of resources. If the function is not a financial aid office responsibility, please indicate N/A.

APPLICATION PROCESSING

	Drop Down: Greatly Affected Somewhat Affected Slightly Affected Not Affected N/A
Accurately determining student eligibility and resolving C-codes	
Accurately awarding aid according to program requirements	
Formulating/updating costs of attendance	
Verification: Discretionary verification of additional data elements	
Verification: Accuracy of verification results	
Resolution of conflicting information outside of verification process	
Student file maintenance	
Other (box for text)	

OTHER AID PROCESSING

	Drop Down: Greatly Affected Somewhat Affected Slightly Affected Not Affected N/A
Generating aid packages	
Award revisions (due to changes in EFC, enrollment status, housing, COA, etc.)	
Identification and resolution of overawards	
Implementation of 150% rule for Direct Loan interest subsidy	
Timely restoration of overpayments due to overawards to program accounts	
Pell Grant Lifetime Eligibility Used	
Gainful Employment (if applicable)	
Timely disbursement	

Resolution of Satisfactory Academic Progress issues for students	
Data transfer to and from U.S. Department of Education (e.g., exporting records to COD, importing COD response files, importing ISIRs)	
Other (box for text)	

PROFESSIONAL JUDGMENT

	Drop Down: Greatly Affected Somewhat Affected Slightly Affected Not Affected N/A
Proactive identification of possible exceptional circumstances	
Processing requests	
Making adjustments	
Other (box for text)	

COMPLIANCE

	Drop Down: Greatly Affected Somewhat Affected Slightly Affected Not Affected N/A
Meeting existing federal rules and regulations directly related to the Title IV aid programs (e.g., program requirements, recordkeeping and reporting, etc.)	
Meeting existing federal rules and regulations indirectly related to the Title IV aid programs (e.g., crime statistics, fire safety, athletically-related disclosures.)	

Incorporating new Title IV regulatory requirements	
Meeting non-Title IV federal regulatory requirements (FERPA, HHS, etc.)	
Meeting state aid rules	
Meeting private aid rules	
Meeting institutional policies and procedures with regard to financial aid	
Analyzing and responding to notices of proposed rulemaking (NPRMs)	
Default prevention and resolution activities	
Other (box for text)	

RETURN OF TITLE IV FUNDS

	Drop Down: Greatly Affected Somewhat Affected Slightly Affected Not Affected N/A
Identification of withdrawn students/dropouts	
Determination of withdrawal date (e.g., use of midpoint versus last date of attendance)	
Accuracy of return of Title IV calculations	
Timeliness of return of Title IV calculations	
Timeliness of restoring program funds to Title IV accounts and making post-withdrawal disbursements	
Other (box for text)	

Student Services

	Drop Down: Greatly Affected Somewhat Affected Slightly Affected

	Not Affected N/A
Regular office hours	
Flexible/extended office hours	
Walk-in hours	
Face-to-face financial aid counseling	
Loan counseling	
Phone contact with students	
Email contact with students	
Orientation activities	
Outreach efforts (e.g., presentations, webinars, admissions activities, high school counselor training)	
Focusing on target populations	
Web and social media content/information	
Financial literacy services	
Other (box for text)	

Student/Family Consumer Information

	Drop Down: Greatly Affected Somewhat Affected Slightly Affected Not Affected N/A
Updating institutional costs	
Updating and producing annual aid application information (e.g., catalog, webpage)	
Compliance with consumer disclosure requirements	
Other activities related to student/family consumer information not listed above	

PROFESSIONAL DEVELOPMENT

	Drop Down: Greatly Affected Somewhat Affected Slightly Affected Not Affected N/A
Staff training	
Conflict resolution	
Providing/updating office equipment	
Orientation/onboarding for new staff	
Other (box for text)	

RESOURCE NEED

This section of the survey asks for your perceptions about additional resources that your office needs to maintain quality financial aid services. Again, please keep in mind the regulations related to providing an "adequate number of qualified persons to administer the Title IV, HEA programs in which the institution participates" (34 C.F.R. §668.16(b)(2)) and providing "adequate financial aid counseling to eligible students who apply for Title IV, HEA assistance" (34 C.F.R. §668.16(h)) as you complete this section of the survey.

The Secretary considers the following factors to determine whether an institution uses an adequate number of qualified persons to administer the Title IV, HEA programs in which the institution participates—

(i) The number and types of programs in which the institution participates;
(ii) The number of applications evaluated;
(iii) The number of students who receive any student financial assistance at the institution and the amount of funds administered;
(iv) The financial aid delivery system used by the institution;
(v) The degree of office automation used by the institution in the administration of the Title IV, HEA programs;
(vi) The number and distribution of financial aid staff; and
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In assessing whether a school has adequate financial aid counseling, the Secretary considers the following information—

(1) The source and amount of each type of aid offered;
(2) The method by which aid is determined and disbursed, delivered, or applied to a student's account; and

(3) The rights and responsibilities of the student with respect to enrollment at the institution and receipt of financial aid. This information includes the institution's refund policy, the requirements for the treatment of title IV, HEA program funds when a student withdraws under §668.22, its standards of satisfactory progress, and other conditions that may alter the student's aid package.

Please identify those areas and resources your office needs more of in order to effectively meet the Department of Education's standards for administration of Title IV funding programs and financial aid counseling.

Resource Area	Resource Needed Yes/No
Management staff	
Counseling staff	
Support staff	
Student staff	
Technical support staff	
Technological upgrades	
Training (technological)	
Training (process and procedures)	
Operating budget	
Aid available for students	
Automation	
Third party servicers	
Other A (box for text)	
Other B (box for text)	
Other C (box for text)	
Other D (box for text)	

For each item you selected, please list the total additional amount of that resource needed (e.g., 1.5 FTE counseling staff) and the estimate of total added cost. (Please enter only numbers; do not use commas (,), or dollar signs ($). Decimals may be used).

Resource Area	Amount of resources needed (e.g., 1.5 FTE counseling staff)	Estimated additional cost
Carry forward choices from previous question.		

If you could add only one additional resource in order to improve the functioning of your office, what would it be?
- Management staff
- Counseling staff
- Support staff
- Student staff
- IT Support Staff
- Technological upgrades
- Training (technological)
- Training (process and procedures)
- Operating budget
- Aid available for students
- Automation
- Third party servicers
- Operating autonomy
- In my opinion, my office is adequately resourced
- Other (please specify)_____

VERIFICATION

The following questions are intended to learn more about your institution's verification burden.

For the following award years, what percentage of your applicants were selected for verification? (Please enter only numbers; do not use commas (,), decimals (.), percent (%), etc.)

	Selected by ED	Selected by Your Office (that were not selected by ED)
Award Year 2013-14		
Award Year 2018-19		

On average what percentage of your total operating budget goes to complying with verification (include staff, fringe benefits, facilities, and office resources).

- 0-4%
- 5-9%
- 10-14%
- 15-19%
- 20% or more

If your financial aid office **does not** outsource verification, please answer the following questions:

What verification tracking group is the most burdensome for your staff?
- V1
- V4
- V5

How much time on average does your staff spend to verify **a single application** (including communication of verification requirement, follow up, answering questions, document collection/data entry, completing verification/updating systems)?
- 0-4 minutes
- 5-9 minutes
- 10-19 minutes
- 20-29 minutes
- 30-44 minutes
- 45-59 minutes
- Great than one hr

On average how many resources are needed (e.g. 1.5 FTE counseling staff) to process all verifications in a single academic year. (Please enter only numbers, do not use commas (,), or dollar signs ($). Decimals may be used). OPEN BOX

Further Defining Administrative Capability in Law

The following questions seek to obtain feedback on further defining administrative capability in law or regulation. The results of these questions will be used to inform NASFAA's policy and advocacy efforts in this area and will be shared with NASFAA's membership in the aggregate, in a separate report from our 2020 Administrative Burden Survey Report. No individuals or institutions will be identified.

Background:
Institutions are required to demonstrate that they are capable of administering the Title IV aid programs as a condition of their participation. These administrative capability conditions include requirements to establish a coordinating official for Title IV aid funds, to have adequate staffing, and to have a system of checks and balances between authorizing and disbursing funds. Current regulations do not establish specific parameters or thresholds that would indicate that an institution is "administratively capable." That lack of specificity may make it difficult for some institutions to garner the resources they need to become or remain administratively capable. On the other hand,

specifically defining administrative capability could come with some downsides. This survey seeks to obtain preliminary member feedback and impressions on this topic.

Would you want administrative capability further defined in statute or regulation?
- Yes
- No
- Unsure

In your opinion, which of the following would be valid ways to define or signal that an institution is administratively capable to participate in the Title IV aid programs? **Please select all that apply.**
- Dollars spent on financial aid staff training and professional development relative to other institutions of similar size, mission, etc.
- Dollars spent on financial aid staff salaries relative to other institutions of similar size, mission, geography, etc.
- Number of financial aid related conferences attended annually
- Number of financial aid related trainings completed annually
- Credentials earned or Certified Financial Aid Administrator™ (CFAA) program completion by staff
- A ratio of dollars provided to the financial aid office for ongoing training and staffing based on student population or other factor
- Audit findings
- Compliance review (could be done through NASFAA, by an outside company, or internally)
- Percentage of administrative cost allowance allocated toward training
- Number of staff that administers financial aid per FTE
- Average tenure of staff that administers financial aid

What is your opinion of having Administrative Capability assigned a dollar amount per FTE that sets a minimum standard to signal a school is administratively capable? For instance, for an institution to be considered administratively capable, it would have to spend more than a set amount per student per year on financial aid office staffing and/or training and professional development.

How comfortable would you be with thresholds for Administrative Capability that could be used to potentially incentivize a school to provide adequate resources to a financial aid office? For instance, an institution could be guaranteed to be exempt from a program review if it had a CFAA on staff and five years with no audit findings.

Please use the space below to provide any other feedback you have related to further defining Administrative Capability in law.

OTHER FEEDBACK

Please use the following space to outline any other factors/issues that you believe are important in the survey's general context but were not captured by the previous questions.