

## Financial Aid Responsibilities in All Collaborative Program Agreements

Federal regulations prohibit a student from receiving financial aid at more than one institution during the same award period. Financial Aid applicants who enroll in courses at another eligible institution may receive financial aid from the degree-granting college through a consortium agreement. The degree-granting college may give permission to the other college to pay financial aid on their behalf if agreed to in that consortium agreement. According to Department of Education, the degree-granting college is considered to be the HOME college and the other college is considered the HOST college.

This agreement will serve as the official consortium agreement and business process among WTCS Financial Aid Directors in the following types of delivery:

WTCS to WTCS -shared programs. Home school disburses aid. (template)  
WTCS to WTCS (Liberal Studies). Host school disburses aid. (template)  
WTCS to UW Colleges (2 year) – 1 + 1. Host school disburses aid. (template)  
WTCS to Universities (4 year) - 1 + 3. Host school disburses aid. (template)  
WTCS to Private (Interwoven). Host school disburses aid (template)  
WTCS to WTCS (E-Tech courses) Home school disburses aid. (template)  
Individual Agreement. Home school disburses aid. (template)

**FRAMEWORK:** While the list below is not all-encompassing, the following financial aid responsibilities must be agreed upon based on the type of delivery above:

- Determine eligibility.
- Perform verification on selected files.
- Adjust the student's cost of attendance to include the combined credits for which the student is enrolled at both institutions. Since WTCS tuition is set statewide for all Wisconsin Technical Colleges, only credit level and unique costs will impact the cost of attendance. University and Private College tuition must be considered if the student is concurrently (dual) enrolled.
- Provide financial aid award letters to students in a timely manner.
- Agree on handling billing and deferrals.
- Provide entrance and exit loan counseling for students who take out loans.
- Disburse financial aid on the disbursing school's FA census date. [Verify combined enrollment at both institutions prior to disbursement of financial aid.]
- Monitor Satisfactory Academic Progress according to the home school's SAP. policy [NOTE: Even though grades received through consortium agreements do not have to be included in the calculation of the student grade point average, the credits must be included when calculating the quantitative component of a student's satisfactory academic progress:  $\text{credits earned} \div \text{credit attempted} = \text{completion rate}$ .]
- Report enrollment to NSLDS via the National Student Clearinghouse.
- Calculate the return of Title IV Funds for students who withdraw.
- Pay students who have earned Federal Work-Study.

- All participating colleges will complete agreements and retain records per financial aid records retention requirements.
- In order to be considered, a student must:  
Submit a financial aid application (FAFSA) to the U.S. Dept. of Education  
Be accepted in an eligible financial aid program  
Must be enrolled in mutual college agreed-upon equivalent courses

### **BUSINESS PROCESS:**

- A roster will be used to communicate with the other college to verify admissions acceptance, enrollment, enrollment changes, etc. throughout each term.
- Depending upon what type of consortium agreement, the WTCS office may assign a special aid code to track those students at the entry (host) college and the WTCS Office.

These items will be agreed upon between the colleges entering into the agreements according to the Federal Regulations using the “Guidance on Financial Aid Requirements for All Consortium Agreements” and the templates provided.

### **Guidance on Financial Aid Requirements for All Consortium Agreements**

According to the Department of Education,\* there must be three components in the *consortium agreement* in order to make students eligible for financial aid. These must be in place in a *consortium agreement* and signed before financial aid can be awarded.

1. The Student must be *accepted as a Regular Student* in a Financial Aid eligible program.

A person must be enrolled as a regular student *in an eligible program* in order to receive FSA funds. A *regular student* is someone who is *enrolled or accepted* for enrollment in an eligible institution for the purpose of obtaining a (financial aid eligible program) degree offered by the school. A school must document a student’s enrollment in an eligible program at the time of admission, and it must have a system to notify the financial aid office if the student leaves the program. It must also document that an aid recipient is a *regular student*.

- Basic student eligibility issues:
  - ☒ must be enrolled as a regular student in an eligible program
  - ☒ cannot also be enrolled in elementary or secondary school
  - ☒ must have a high school diploma or equivalent; pass an approved ability-to-benefit test, or have been home schooled
  - ☒ must make satisfactory progress
  - ☒ must meet enrollment status requirements
  - ☒ must have resolved any drug conviction issue

2. Aid eligible program

Two or more schools may enter into a *consortium* or contractual *agreement* so that a student can continue to receive Federal Student Aid (FSA) funds while studying at a school or organization other than his or her “*home*” school. (The *home* school is the one that will grant the student’s degree or certificate.) When there is a written arrangement between eligible schools, any of the schools participating in the written arrangement may make Federal Student Aid calculations and disbursements. This is true even if the student is not currently taking courses at the school that is calculating and disbursing the aid. The school must ensure that a student is accepted in a

financial aid eligible program before awarding Federal Student Aid funds to students in that program.

The Degree-granting (*Home*) College must be counting the student as a current student for the term during which the student is taking coursework at the *Host* College in order for the student to be eligible for Title IV financial aid. Future enrollment at the Degree-granting (*Home*) College does not make the student eligible for aid at the *Host* College. There is no FA eligible program at the *Host* College. If the student is just taking courses at the *host* college with the intent to transfer, the *consortium agreement* does not apply for FA eligibility if the student is not enrolled at the degree-granting school.

According to Jamie Malone, Department of Education, (email below) Enrolled means "*is currently a regular student in an eligible program*". *Accepted* means "*meets the admission requirements and may enroll at a future date*". If the (*HOME*) College is not counting the student as a current student registered for the term during which the student is taking coursework (at the *HOST* College), the student is not Title IV eligible. Future enrollment (at the *HOME* College) does not make the student eligible for aid (at the *HOST* College). There is no eligible program (at the *HOST* College).

3. Written Agreements between Schools must include:

- The school that will grant the (federal FA eligible) degree.
- List of equivalent courses. Under a consortium agreement, the home school (degree granting) must give credit for courses taken at the other school on the same basis as if it provided the training itself. A student can only receive FSA assistance for courses that are applicable to the student's eligible degree program.
- The student's tuition, fees and room and board costs at each school.
- The student's enrollment status at each school.
- The school that will be responsible for disbursing aid and monitoring student eligibility.
- Procedures for calculating awards, disbursing aid, monitoring satisfactory progress and other student eligibility requirements, keeping records, and returning funds in the event the student withdraws.

DEFINITIONS

Department of Education Term	Relevance to WTCS
<p>1. <u>Consortium Agreement</u> – A written agreement between two eligible schools under which the host school provides all or part of the program for students enrolled in the home school - if the home school gives credit to students enrolled in that part of the program on the same basis as if it provided that program itself.</p> <p><u>Home School</u>- The degree-granting college where the student is enrolled in a “financial aid eligible” degree program.</p> <p><u>Host School</u>-The college where the student is taking part of his or her program requirements through a consortium agreement.</p>	<p>WTCS Districts are interested in providing more opportunities and access for students by entering into agreements with other WTCS Colleges, UW-Colleges (2 year), University of WI Colleges (4 year), and Private Colleges.</p> <p>WTCS Colleges offer Technical Diploma and Associate Degree level programs and not Baccalaureate level degrees, so students must be accepted into financial aid eligible degree programs to be eligible for any type of financial aid.</p>
<p>2. Student must be <u>enrolled</u> as a “regular student” in an eligible program</p>	<p>2. The degree-granting college (home) who holds the “financial aid eligible program” must demonstrate that the student has applied and is accepted into a financial aid eligible program according to basic “regular” student eligibility rules. The home college must show the student is actively pursuing the degree which is established by the student “applying” and meeting the requirements for the program. The home college must show the student is actively pursuing the degree for each term that the host college is paying financial aid. The home college must notify the host college (where student is attending) if the student discontinues the program of study.</p>
<p>3. <u>Regular Student</u> –someone who is enrolled or accepted for enrollment in an eligible institution for the purpose of obtaining a (financial aid eligible program) degree at the time of admission.</p>	<p>3. Student must have a high-school diploma or equivalent; pass an approved ability-to-benefit test, or have been home schooled; must not be enrolled in elementary or secondary school, must meet satisfactory progress, must meet enrollment status requirements and must have resolved any drug conviction issue.</p>
<p>4. <u>Accepted</u> as a regular student</p>	<p>4. The student has met all of the admission criteria determined by the College granting the degree for entrance into the financial aid eligible program.</p>
<p>5. The degree-granting college must be</p>	<p>5. The home college has recognized the</p>

<p>counting the student as a current student <u>registered</u> for the term during which the student is taking coursework at the host college in order for the student to be eligible for Title IV financial aid.</p>	<p>student as accepted and actively pursuing the “financial aid eligible” program of study. The home college will create a student record and assign the appropriate program code to the student record. For example, WTCS liberal arts collegiate transfer degree colleges (home) will verify the student has met acceptance standards for the degree and apply the WTCS Aid Code 20 to “count” and “register” the student as actively seeking the degree. The host college will “track” the student with the WTCS Aid Code 10 assigned once submitted and approved by WTCS. The home college should not record any course or credit activity to that record unless the student is simultaneously enrolled at both the home and host colleges (dual enrolled). The host college will be reporting course or credit activity to WTCS under the assigned Aid Code 10.</p>
<p>6. Student must <u>meet enrollment status requirements</u>.</p>	<p>6. Financial aid eligibility must be based on the student’s enrollment for the term. Students in a consortium agreement do <u>not</u> have to be enrolled simultaneously (dual enrolled) at both colleges as part of the agreement. If students are enrolled at either college, the Financial Aid Office disbursing the funds must take enrollment at both colleges into consideration for eligibility.</p>

\*References:

**2008-09 Federal Student Aid Handbook: School Eligibility and Operations**

Volume 1, Student Eligibility, Chapter 1 School Determined Requirements; Title 34: Education CFR 668.32

<http://www.ifap.ed.gov/sfahandbooks/attachments/0809FSAHbkVol1Ch1.pdf>

Volume 2 School Eligibility and Operations, Chapter 7 Written Agreements Between Schools: Title 34: CFR 668.5

<http://www.ifap.ed.gov/sfahandbooks/attachments/Vol2Ch70809.pdf>

**Guidance from Jamie Malone, Department of Education**

-----Original Message-----

From: Malone, Jamie [mailto:Jamie.Malone@ed.gov]

Sent: Tuesday, March 25, 2008 5:00 PM

To: Green, Mary Jo

Subject: RE: Question on Consortium agreements -need another perspective

Mary Jo,

Sorry, I think I missed your Tuesday deadline.

I'm understanding that MATC is granting the associate degree and Mid-State is not granting any degree to these students. If that's correct, then the student must be enrolled at MATC as a regular student in an eligible program to be Title IV eligible. If the student is taking classes at Mid-State and not enrolled at MATC, the student is not Title IV eligible because he is not enrolled as a regular student in an eligible program at Mid-State. The student is just taking courses at Mid-State with the intent to transfer to MATC. The consortium does no good if the student is not enrolled at the degree granting school. If the student is enrolled at MATC, Mid-State may pay the aid for the first year through the consortium, since the students are taking the coursework for the first year at Mid-State.

Hope this is helpful,  
Jamie

Jamie A. Malone  
Training Officer  
U.S. Department of Education

**From:** Malone, Jamie [mailto:Jamie.Malone@ed.gov]

**Sent:** Thursday, April 03, 2008 4:59 PM

**To:** Green, Mary Jo

**Subject:** RE: Question on Consortium agreements -need another perspective

MaryJo,

Enrolled means is currently a regular student in an eligible program. Accepted means meets the admission requirements and may enroll at a future date. If MATC is not counting the student as a current student registered for the term during which the student is taking coursework at MSTC, the student is not Title IV eligible. Future enrollment at MATC does not make the student eligible for aid at MSTC. There is no eligible program at MSTC.

Jamie

**(Template Checklist to use in all Consortium Agreements)**

**Consortium Agreement between:**

Office of Financial Aid (degree granting) \_\_\_\_\_

Office of Financial Aid (Host) \_\_\_\_\_

For Program \_\_\_\_\_ Fiscal Year \_\_\_\_\_

<u>Responsibilities</u>	<u>Degree Granting</u>	<u>Host</u>	<u>Comments</u>
Signed contract on file	<input type="checkbox"/>	<input type="checkbox"/>	
List of approved coursework on file	<input type="checkbox"/>	<input type="checkbox"/>	
Verify acceptance/Program code available	<input type="checkbox"/>	<input type="checkbox"/>	
FA Consortium agreement initiated	<input type="checkbox"/>	<input type="checkbox"/>	
Responsible for administration of financial aid	<input type="checkbox"/>	<input type="checkbox"/>	
Entrance counseling	<input type="checkbox"/>	<input type="checkbox"/>	
Verify registration/credit loads	<input type="checkbox"/>	<input type="checkbox"/>	
Tuition payment/deferment/date/location	<input type="checkbox"/>	<input type="checkbox"/>	
Reporting enrollment status to NSLC	<input type="checkbox"/>	<input type="checkbox"/>	

	<u>Fall</u>	<u>Spring</u>	<u>Summer</u>
Start date of classes			
Census date			
End date of classes			
Additional cost of attendance			
FA Disbursement dates			
Grade/grade transcripts			
Satisfactory progress	<input type="checkbox"/>	<input type="checkbox"/>	
Exit counseling	<input type="checkbox"/>	<input type="checkbox"/>	
R2T4	<input type="checkbox"/>	<input type="checkbox"/>	
Class roster (attached)	<input type="checkbox"/>	<input type="checkbox"/>	

<u>Degree granting school</u>		<u>Host school</u>	
Name of school		Name of school	
FA Officer Name		FA Officer Name	
FA Officer Signature		FA Officer Signature	
Address		Address	
Phone		Phone	
Fax		Fax	
E-mail		E-mail	





WCTS Consortium Agreement for all Collaborative Programs

Signature: Sue Ullrick

Date: 9-28-12

Sue Ullrick  
Financial Aid Coordinator  
Blackhawk Technical College

Signature: Mary Jo Green

Date: 9/28/12

Mary Jo Green  
Financial Aid Supervisor  
Mid-State Technical College

Signature: Joy Kite

Date: 10/26/2012

Joy Kite  
Student Financial Assistant Manager  
Southwest Wis. Technical College

Signature: Mary E. Gorud

Date: 9-28-12

Mary Gorud  
Financial Aid Manager  
Chippewa Valley Technical College

Signature: Jerome Manz

Date: 9/28/12

Jerome Manz  
Interim Director of Financial Aid  
Milwaukee Area Technical College

Signature: Tim K. Jacobson

Date: 9/28/12

Tim Jacobson  
Financial Aid Manager  
Waukesha County Technical College

Signature: Stacy Doran

Date: 9-28-12

Stacy Doran  
Director, Student Finance  
Fox Valley Technical College

Signature: Julie Waldvogel-Leitner

Date: 10/4/12

Julie Waldvogel-Leitner  
Financial Aid Associate  
Moraine Park Technical College

Signature: Jerolyn Grandall

Date: 9-28-12

Jerolyn Grandall  
Financial Aid Manager  
Western Technical College

Signature: Janice Riutta

Date: 10.14.2012

Janice Riutta  
Financial Aid Director  
Gateway Technical College

Signature: Jill Price

Date: 9/28/12

Jill Price  
Director of Financial Aid  
Nicolet Area Technical College

Signature: Terry Klein

Date: 9/28/12

Terry Klein  
Director, Financial Aid  
Wis. Indianhead Technical College

Signature: Corey Givens-Novak

Date: 9-28-12

Corey Givens-Novak  
Financial Aid Manager  
Lakeshore Technical College

Signature: May Lee

Date: 9/28/12

May Lee  
Director of Financial Aid  
Northcentral Technical College

Signature: Jennifer Hoega

Date: 9-28-12

Jennifer Hoega  
Director of Financial Aid  
Madison Area Technical College

Signature: Emily Ysebaert

Date: 10/9/2012

Emily Ysebaert  
Director of Financial Aid  
Northeast Wis. Technical College