



**Department of Education
Institutional Assessment Visit
Follow Up Summary
September 1, 2020**

Background

Merritt college had an Institutional Assessment Visit by the Department of Education on March 5-7, 2019. The college was provided with a follow report that included twelve recommendations that required corrective actions.

In November of 2019, in my role as Dean I was provided the opportunity to support the Financial Aid Department. The department had not had a supervisor for over three years impacting the oversight of daily operations. As a result, the department has had repeated audit findings in addition to the twelve recommendations.

With the five Financial Aid Specialists we as a team reviewed and discussed the findings and started to research and correct the recommendations provided by the Department of Education. In December 2019, we had a transition in leadership. I was appointed as acting Vice President of Student Services and I took on a more active role to support the needs of the Financial Aid department to work towards meeting our compliance. The following were areas that were reviewed and updated:

- * Maintained meetings with the Department of Education
- * Contributed to the college catalog revisions
- * Completed all SAP appeals and remained current
- * Reviewed and updated the SAP policy and committee
- * Identified and documented Financial Aid website changes
- * All staff signed up for trainings to support current job knowledge and professional development
- * Evaluated processes
- * Updated PPA with current and accurate information
- * Developed policies and procedures to ensure that R2T4 calculations are completed within the established deadlines
- * Identified the Default Prevention team (need to request specialized training from DOE.)
- * Problems were reviewed with staff to incorporate distributive leadership and inclusion
- * Overtime was offered for extended hours to the Financial Aid team
- * District changes were implemented, and each campus was supported to hire the Financial Aid Director
- * Extensive research was completed from November 2019 through March 2020 to identify errors on the Financial Aid website
- * Corrections were made to the Financial Aid website from March 2020 through May 2020.

On April 21, 2020, I became the permanent Vice President of Student Services. I continued to work on the corrective actions with the Financial Aid staff. On May 12, 2020 the Financial Aid Director was appointed. A succession plan was provided to demonstrate the progress of the twelve recommendations. The Financial Aid Director was proactive and continued meeting with our sister colleges and district to contribute to the Merritt Financial Aid Policies & Procedures Manual. Since, May 2020 through September 1, 2020 the Financial Aid Director and I have been meeting to gather evidence, finalize all the recommendations and update the website to meet the DOE's compliance requirements.

Recommendations & College Responses

- I. Recommendation is for the Institution to review the current Drug and Alcohol Prevention Program and document the results of the biennial review to determine if it meets the regulatory requirements.**

College Response:

The college has updated the website to include the Drug Abuse and Alcohol prevention requirements.

<https://www.merritt.edu/wp/financial-aid/drug-abuse-and-alcohol-prevention-program/>

Updated the link to the biennial review. [Annual Security Report 2019](#)

<https://www.merritt.edu/wp/police/wp-content/uploads/sites/98/2020/06/Annual-Security-Report-2-2019-.pdf>

- II. Recommendation is to provide the required consumer information to prospective/current students and /or employees. Examples of missing elements include:**

- a. **Notice of Availability of Institutional and Financial Aid Information**
- b. **Notice of Drug Law Violation Penalty**
- c. **Transfer of Credits Policies and Articulation Agreements**
- d. **Requirements for Withdrawal (Including Online Option)**

Also, the institution must ensure that all publications have consistent information and is updated across all platforms. The institution should consider a point of contact for reviewing and updating consumer information. Please see the FSA resource referenced above for a complete list of required consumer information.

College Response:

The college has updated the necessary items that need to be available to students via the Consumer Information link located on the financial aid webpage.

<https://www.merritt.edu/wp/financial-aid/consumer-information-2/>

- III. Recommendation is for the institution to develop a task force and create a Default Management/Prevention Plan. The MSURSD team will provide specialized training in this area.**

College Response:

The college three-year cohort default rate for 2014, 2015, and 2016 are as follows see table below. Every year the college has reduced the overall default rate.

https://nslds.ed.gov/nslds/nslds_SA/defaultmanagement/search_cohortCY2016.cfm

<i>Year 2014</i>	<i>Year 2015</i>	<i>Year 2016</i>
<i>27.9%</i>	<i>24.3%</i>	<i>23.6%</i>

The data was retrieved from the Department of Education website on 8/17/20.

Membership for Taskforce/Default Management/Prevention Plan: 1. Financial Aid Supervisor, Chair 2. CalWORKs Coordinator or designee from CalWORKs (selected by Dean of Student Support Services) 3. EOPS Coordinator 4. Student Activities Coordinator 5. Two (2) Counselors selected by the Counseling Dept. Chair 6. Dean of Student Support Services

IV. Recommendation is for the institution to develop and implement policies and procedures to reconcile Title IV programs as required. In addition, the institution must reconcile campus-based programs monthly. The institution must document the monthly reconciliation process between the financial aid office and business office.

College Response:

The college has been working diligently with District Finance to ensure that federal program funds are reconciled with G5 draw downs. In addition, the college has developed and implemented a monthly reconciliation of the federal direct loan program. Evidence provided demonstrates that all federal funds have been reconciled.

Attachments for District

- *Direct loans @FY19-20*
- *FWS @FY19-20*
- *G5 Drawdown Summary (DL)*
- *G5 Drawdown Summary FWS*
- *G5 Drawdown Summary Pell*
- *PELL@FY19-20*
- *G5 Drawdown Summary SEOG*
- *SEOG@FY19-20*

Attachment for Merritt College

- *DL Reconciliation 19-20 Excel*

V. Recommendation is for the institution to have a policies and procedures manual in coordination with the district wide manual.

College Response:

The college and the district have collaborated and updated the Financial Aid Policies and Procedures Manual. Attachment is included.

VI. The FY2018 Audit included a Return of Title IV (R2T4) finding for returns made late. Recommendation is for the institution to review and continue to implement its Corrective Actions Plan to avoid repeat finding(s).

College Response: The college has implemented the following corrective actions:

- The district held districtwide meetings to discuss and improve the R2T4 process. As a result, we have developed procedures to identify students who have received a federal payment and withdrew from all their classes in order to perform the R2T4 calculation, adjust the students' disbursement and return the funds within that week. *You can find information and evidence on page 88 of the Merritt Financial Aid Policies & Procedures Handbook.*
- These duties fall on the FA Supervisor at which time Merritt College had been without the staff member for the last three years. To support this task two specialists were asked to work with the district financial aid director to meet the requirements of R2T4.
- Hired a full-time Financial Aid Director to oversee and administer the process to ensure that the college is complying.

VII. Recommendation is for the institution to review its Satisfactory Academic Progress (SAP) Policy and determine if it meets the Title IV compliance standards. The institution may consider including departments outside of financial aid on the SAP appeal committee. Additionally, the faculty should submit grades in a timely manner to ensure that Satisfactory Academic Progress (SAP) standards are checked prior to the beginning of the next term.

College Response:

- *The policy has been reviewed and updated in the Financial Aid Policies and Procedures Manual.*
- *Membership for FA Appeals Committee per Participatory Governance Handbook: 1. Financial Aid Supervisor, Chair 2. CalWORKs Coordinator or designee from CalWORKs (selected by Dean of Student Support Services) 3. EOPS Coordinator 4. Student Activities Coordinator 5. Two (2) Counselors selected by the Counseling Dept. Chair 6. Dean of Student Support Services*

- *The Vice Chancellor of Academic & Student Affairs sends out email reminders to faculty every semester requesting that they submit grades by the established deadlines. See attached copies of evidence for Spring and Summer 2020.*

VIII. Recommendation is for the institution to review its Program Participation Agreement (PPA) and ensure all elements are correct. Additionally, the institution's current certification expires June 30, 2019. The reapplication due date is 90 days prior to the certification expiration date.

College Response:

The college has completed the Program Participation Agreement (PPA) and attached evidence of approved PPA. See attached letter dated 6/17/2020.

IX. Recommendation is for the institution to consider imaging files. Also, the institution must ensure that the institution data security plan/program meets the regulations outlined by the Department of Education (DOE).

College Response:

- *The District and colleges have purchased Campus logic and the implementation will take place in fall 2020 this new tool will allow students to upload documents via a secure cloud.*
- *The district has provided the evidence for the data security plan. See attachment*

X. Recommendation is for the institution to expand its use of the student portal.

College Response:

The college currently utilizes peoplesoft software for student access into their portal. The district has agreed to implement and expand the student information system via campus logic to allow students to submit documents through their ipads, phones, computers or any electronic and/or portable device to improve the student experience. Email evidence from VC Brown implementation in progress.

XI. Recommendation is for the institution to designate a coordinating official to administer Title IV programs. The institution should consider reinstating the Financial Aid Supervisor position.

College Response:

The college has hired a permanent Financial Aid Director as of May 12, 2020

XII. Recommendation is for the financial aid office and business office staff to attend Federal Student Aid Fundamentals Training, Federal Student Aid Annual Conference, and other National, Regional, State, and Local Title IV training opportunities. Also, the institution should provide annual FERPA training for employees.

College Response:

The FA Director has provided a list of trainings that the Financial Aid Staff have attended for June and July. See attachment.

If you need more information, please do not hesitate to contact me. Thanking you in advance for your support.