

BOARD OF REGENTS
BRIEFING PAPER

1. **AGENDA ITEM TITLE:** CSN Program Participation Agreement/Financial Aid Status Update

MEETING DATE: June 2018

2. BACKGROUND & POLICY CONTEXT OF ISSUE:

Vice President of Student Affairs Juanita Chrysanthou and Acting President Dr. Margo Martin will present to the Board of Regents a brief history of CSN's Program Participation Agreement with the U.S. Department of Education and current status of CSN's financial aid program, specifically the provisional approval of CSN's PPA.

3. SPECIFIC ACTIONS BEING RECOMMENDED OR REQUESTED:

Information only.

4. IMPETUS (WHY NOW?):

CSN's PPA approval status is currently provisional through March 2019. CSN has taken corrective action so that the college can apply for full approval status to be effective in the coming calendar year.

5. CHECK THE NSHE STRATEGIC PLAN GOAL THAT IS SUPPORTED BY THIS REQUEST:

- X Access (Increase participation in post-secondary education)
- X Success (Increase student success)
- Close the Achievement Gap (Close the achievement gap among underserved student populations)
- Workforce (Collaboratively address the challenges of the workforce and industry education needs of Nevada)
- Research (Co-develop solutions to the critical issues facing 21st century Nevada and raise the overall research profile)
- Not Applicable to NSHE Strategic Plan Goals

INDICATE HOW THE PROPOSAL SUPPORTS THE SPECIFIC STRATEGIC PLAN GOAL

Ensuring that CSN can administer federal financial aid to students is a cornerstone of providing access to higher education and student success for program/degree completion.

6. BULLET POINTS TO SUPPORT REQUEST/RECOMMENDATION:

N/A

7. POTENTIAL ARGUMENTS AGAINST THE REQUEST/RECOMMENDATION:

N/A

8. ALTERNATIVE(S) TO WHAT IS BEING REQUESTED/RECOMMENDED:

N/A

9. RECOMMENDATION FROM THE CHANCELLOR'S OFFICE:

N/A

10. COMPLIANCE WITH BOARD POLICY:

<input type="checkbox"/> Consistent With Current Board Policy: Title #_____ Chapter #_____ Section #_____
<input type="checkbox"/> Amends Current Board Policy: Title #_____ Chapter #_____ Section #_____
<input type="checkbox"/> Amends Current Procedures & Guidelines Manual: Chapter #_____ Section #_____
<input type="checkbox"/> Other:_____
<input type="checkbox"/> Fiscal Impact: Yes_____ No_____
Explain:_____

The seal of the Nevada System of Higher Education is a circular emblem. It features a central shield with a sun rising over a landscape with a building and a tree. The shield is surrounded by a ring of stars. The outermost ring of the seal contains the text "NEVADA SYSTEM OF HIGHER EDUCATION" at the top and "1869" at the bottom.

College of Southern Nevada

Continued Financial Aid Eligibility for Title IV Funds through the Program Participation Agreement (PPA)

What is the Purpose and Scope of the PPA?

- To participate in the Federal Student Aid (FSA) programs, a school must have a current Program Participation Agreement (PPA) signed by the school's president.
- With the PPA the school agrees to comply with the laws, regulations, and policies governing the FSA programs.
- The PPA provides the effective date of a school's approval and the date by which the school must reapply for participation.

Reapplication for CSN

- CSN reapplied for Certification to the PPA on March 31, 2015.
- Eligibility for financial aid is extended by the U.S. Department of Education until they review and respond.
- The PPA is closed at this time to the school for any changes or additions of new programs.

Reapplication for CSN

- Received letter from NWCCC on May 11, 2016 - new programs approved for CSN.
- Awaited response on the Reapplication for Title IV aid until February 2018.
- Contacted DOE requesting action on closed PPA.
- Received response from the Department of Education on February 9, 2018, that CSN was granted Provisional Certification to participate in Title IV, HEA programs until March 31, 2019.
- Required to reapply for the PPA by December 31, 2018.

Special Requirements for Substantial Changes Made during Term of Provisional Certification

- Any institution provisionally certified must apply for and receive approval by the Secretary for program expansion or any substantial change (as hereinafter identified) before it may award, disburse or distribute Title IV, HEA funds based on the substantial change. Substantial changes generally include, but are not limited to: (a) establishment of an additional location; (b) increase in the level of academic offering beyond those listed in the Institution's Eligibility and Certification Approval Report (ECAR); or (c) addition of any educational program (including degree, non-degree, or short-term training programs).

Special Requirements for Substantial Changes Made during Term of Provisional Certification

- If the Institution applies for the Secretary's approval of a substantial change, the Institution must demonstrate that it has the financial and administrative capability necessary to assure the Institution's continued compliance with the standards of financial responsibility (34 C.F.R. 668.15) and administrative capability (34 C.F.R. 668.16).

Reasons Given for Provisional Certification

- New Degree Program at Public or Private Non-profit
 - In addition to the expansions and substantial changes identified above under Special Requirements for Substantial Changes Made During Term of Provisional Certification, as a provisionally certified public or private non-profit institution, the institution must also apply for and receive approval by the Secretary for the addition of any degree programs.

Reasons Given for Provisional Certification

- Gainful Employment Transitional Certification
 - The institution failed to comply with the Gainful Employment (GE) regulations at 34 C.F.R. § 668.414, which required institutions that offer one or more gainful employment programs to submit to the Department of Education (the Department) a GE Transitional Certification no later than December 31, 2015. College of Southern Nevada submitted the required GE Transitional Certification on April 4, 2016. This failure of adherence to regulatory requirements is reflective of the institution's lack of administrative capability.



Immediate Action

February 2018


- In response to notification, CSN was asked to complete the following steps:
 - Print two copies of Program Participation Agreement (PPA).
 - Secure CSN president's signature on both copies.
 - Submit both copies with original signatures.

Actions Completed

- CSN Financial Aid transferred to Student Affairs effective January 1, 2017.
- March 12, 2018 the Program Participation Agreement (PPA) was opened by the Department of Education (DOE) for CSN to add new President.
- March 12, 2018 CSN updated the President name to reflect Acting President, Dr. Margo Martin.
- March 14, 2018 the Program Participation Agreement (PPA) was reopened again by the Department of Education (DOE) for CSN to add additional changes that occurred between the time CSN submitted the original PPA and the time the DOE granted Provisional Approval.
- CSN Added 8 new Programs to the PPA on March, 15, 2018, and is awaiting approval from the DOE.
- April 6, 2018 CSN complied with the Gainful Employment Transitional Certification.

Pending Items

- The DOE notified CSN on April 24, 2018, that the submitted new programs for approval have been approved and that CSN will receive an updated letter soon.
- The DOE notified CSN that the college can submit the PPA recertification as early as 6 months prior to expiration date of March 31, 2019.
- CSN will submit Application for Recertification in September 2018 with all supporting documentation.



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