



Course Program of Study: The Audit Finding

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Course Program of Study What is CPoS?

- A federal regulation that requires higher education institutions to **only offer financial aid to students for classes that are officially part of their required and documented program of study.**
 - A documented program of study is typically the majors, minors, and other programs that have been officially declared and are in a student's degree audit (J1 advising worksheet)
 - The program of study also includes institutional requirements for the degree such as minimum number of credit hours, course distribution requirements, etc.
 - Courses outside of the official program of study are not eligible for federal or state financial aid



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What is the purpose of CPoS?


- *Some of the reasons federal officials put the CPoS regulation in place were to:*
 - Help reduce time-to-degree and increase college completion rates
 - Reduce student debt and increase college affordability
 - Combat financial aid fraud



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Which financial aid is impacted?

- Federal & state aid is awarded based on a student's enrollment classification, which determined by their declared program of study.
- Federal aid**
 - Grants**
 - Example: If a student is eligible for a Federal Pell Grant and enroll in 12 credit hours but only 9 of the 12 credit hours are required for their declared program of study, the Pell Grant will be reduced to a three-quarter time award based on the 9 countable credit hours.
 - Loans**
 - Example: Federal student loans for undergraduate students require 6 eligible credit hours of enrollment. If a student is enrolled in 12 credit hours and only 3 credit hours are required for their program of study, they are not eligible for federal student loans.
 - Work study**
- All State aid**




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Why is compliance important?

Failure to comply with this regulation jeopardizes BVU's eligibility for Title IV funding.


It also subjects us to audit findings that may in turn jeopardize our accreditation.




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Why now?

- Improved technology in Financial Aid & Registrar allows us to run reports that can flag students who are out of CPoS compliance
- New leadership in Enrollment Management & Financial Aid that brings with it additional knowledge & experience
- Increased scrutiny by financial aid auditors





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Who is most likely to be affected?

- Usually most acute for seniors, so key to be proactive initially and scrutinize rising seniors (current juniors) and any fifth year students.
- It has the potential to affect any student so being planful from the start is key.






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What does this mean for advisors?


- Increased emphasis on thoughtful and strategic academic planning
- Increased emphasis on declaring all majors, minors, etc. as soon as decided
- Increased emphasis on submitting course substitutions as soon as possible
- Increased attention to each advisee's transfer credits, elective buckets, course sequencing, credit pacing, etc.

An area for national improvement
 Data from a recent StudentVoices survey of over 3,000 undergrads at 120+ institutions by Inside Higher Ed and College Pulse revealed that only **56% of students** at four-year colleges say they have "received guidance on required courses and course sequences needed for graduation" via the advising process. And just **52% of students** say they've been advised on their degree progress to make sure they're on track to graduate.






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More to come in the fall

Initial Advising Tips

- Encourage students to officially declare majors and minors as soon as decided
- Use the J1 advising worksheet as the authoritative source of what is in a student's program of study
- Submit any course substitution academic actions as soon as possible
- Pay attention to students' elective buckets, especially students who transferred in significant credits
- Pay attention to students who are tracking ahead (first-year students with sophomore status, etc.) and develop academic plans, think about credit hour pacing, etc.
- Help students be strategic about taking non-program courses for credit (consider zero credit options)
- Be planful about non-degree-required travel, study abroad, internships, etc. and consider ways to substitute in program if possible






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Sample Scenarios

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Only 6 hours needed to finish
Student needs 6 hours to complete a program and wants to take another 6 hours to be fulltime that do not count towards a declared program, but their electives are used up. Title IV aid cannot be used to pay for the 6 unneeded hours. Aid pays on the 6 required hours only in this case.



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Undeclared minor
Student declares a major in Psychology and is following a minor in Spanish but has not declared it. Student enrolls in 9 hours for the major and 3 hours for the minor. Aid pays on 9 hours only because the formal degree plan for that student's official record does not account for courses in an intended (but so far undeclared) minor.


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Credits beyond 12
A student plans to enroll in 17 hours, including 3 hours that don't apply toward outstanding requirements in their officially declared program of study. Students can take between 12-18 credits of any courses. They must be in 12 credits that count towards their degree. Students have additional charges for courses starting at 19 credits/semester.


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Advising Worksheet Examples

- All coursework applies towards degree
- 6 hours of coursework that does NOT apply towards degree









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Support now and later

- Current scope of issue after initial reports
 - Steph & Jamii meeting now and monitoring over spring & summer to develop strategies & solutions
- Attention to juniors and especially rising or continuing seniors in this spring advising cycle
- More robust advising tools (J1 Academic Planning), continual update of FAQs, etc.
- Education/communication plan for students in the works
- Regular reports run and advisors will be alerted and supported (not on your own to discover or solve)





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St. Ambrose Program Review

- St. Ambrose had two findings related to monitoring completion:
 - We did not have a written policy or a procedure in place of how we were monitoring courses applying to program completion
 - We did not have a written policy about duration of eligibility in regards to the mathematical possibility of completing within 180 credit hours.

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St. Ambrose Program Review

- We did not have a written policy or a procedure in place of how we were monitoring courses applying to program completion
 - We added this to our policy and procedure manual and to the online catalog. We now send duration of eligibility letters to all students once they hit 100 credits completed advising them of the rule and the importance of meeting with their advisor or doing a degree audit with the Registrar's office.
 - Created a process in which I run evaluations on individual students and compare this with their registration, adjusting aid accordingly. My Registrar does not manage this process, for no

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St. Ambrose Program Review

- We did not have a written policy about duration of eligibility in regards to the mathematical possibility of completing within 180 credit hours.
 - We added this to our online catalog and to our policy and procedure manual. This monitoring goes hand in hand with the evaluation process. Very few students get to this point at our institution.



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Iowa State University - Communicating the Change to Campus



- Increased functionality with the implementation of a new Student Information System
- Shared concerns with upper administration
- Developed talking points to share with campus community

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Iowa State University - Communicating the Change to Campus



- Identified key stakeholders who will be affected by increased compliance:
 - Faculty/Staff Advisers
 - Staff
 - Students
- Communication stream
 - Change Management team to distribute messaging multiple times to stakeholders
 - Shared information at 2022 and 2023 Campus Partners Conference

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Iowa State University - Changing our Processes

- Currently identifying future state processing maps
 - How will OSFA staff review and resolve?
 - How will students be notified?
- Testing potential number of students affected

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KEY RESOURCE FOR ALL
<https://www.bvu.edu/admissions/financial-assistance/policies-and-procedures/cpos>

CPOS FAQ PAGE ON BVU WEBSITE



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QUESTIONS YOU HAVE?



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