

Male: Okay. Welcome to session 45, and thank you for ending your first day of the conference with us. We're going to be doing some sharing about some of the analysis you've done in the past week. We just had an MLM training on the 14th. I know not everybody has had the opportunity to do the analysis, but hopefully enough of you have that we can share and find out ways that you maybe have found to tweak your individual criteria.

So the Pell Proper Payment Report. How many have done their homework? All right. All right. Good job. Okay. The first question we promised we were going to ask you, when you did – you looked at your – the records that met a single criteria, was anybody able to find a criteria that was so bad, that had such low average Pell change, low average EFC change, that you're just going to ditch it, you know, stop doing that? Okay.

Audience: [Inaudible comment].

Male: Okay. If you'd like to come to the microphone and say what the criteria was, how it came to be and why – and how you're going to be able to get rid of it.

Audience: You want to share?

Male: You want to share?

Audience: I'll bring you the mic. You don't have to if you don't want to.

Audience: Okay. So we had under parent – under dependent student criteria, we had parents who indicated receiving food stamps, and then looking at certain household size and income requirements that should have indicated whether they were or weren't really eligible for that. And we didn't end up selecting any students with those criteria.

Male: Right. Because you had found that they were correct, that they were --

Audience: Right.

Male: Please tell Jeff Baker that.

Audience: Right. So we're going to be checking that one. And I was also wondering too if at the end here we could discuss if people are going to be – with the changes in federal verification, if people are

going to try to mirror that, or if they're going to try and continue on the way they have been with their criteria.

Male: Sure.

Audience: Good question. Thank you. Did anybody else share a criteria they were just going to dump? I mean, there's nothing to be like – feel bad about. I mean, it's just a criteria that didn't work. No? Oh, got one. I'm sorry, **Greg**.

Audience: That's all right. Two that I found, one was conflict with a previous year for a dependent student, and then the other one was – thank you, SNAP, the food stamps.

Audience: Oh, good. So that seems to be a consistent little theme.

Male: Right. I think you can see sometimes you have a criteria that was reasonable, that would be reasonable to suspect that, but when you actually verified them and then you looked at the results, well, that reasonable, rational explanation didn't pan out. So that's kind of the idea of the analysis.

How about the second question? Were you able to find – you had a criteria that overall was pretty good, but you were able to identify a subgroup of students that you could eliminate from future versions of that criteria. That's when you looked at the different categories for dependency status, the filing status, the income levels, the EFC levels. Any example of that?

Audience: Down in the middle?

Audience: Oh, here we go. I'm going to play Oprah or Phil Donahue. There's my age.

Audience: I think one of the ones I noticed was we find a lot of students that are – if they've been married within the last year, the last fiscal year, we select those who are – students who are independent by marriage but through the last year. We find that there's a lot of errors when it comes to taxes because if they filed separately, they end up – that ends up causing problems, and so those get selected. What I've noticed though is a lot of them, they have an O2 if they filed jointly and everything is fair and they did the data retrieval tool. It's just there's no Pell change. There's no – very minimal EFC stuff, and so we're just looking at that and going that's probably something – an element of that data we can exclude to refine it even more.

Male: Good.

Audience: Is that the idea?

Male: Yeah, that's the idea. Okay. Now, when it comes to – anybody else on the tweaking side? Just – okay.

Audience: *[Inaudible comment]*.

Male: Wait.

Audience: We had some where our independent students that were undergraduates, we were selecting – I'm going off of AGI, of an AGI of \$7,500.00 or above, and there was a section of students, \$7,500.00 to \$10,000.00, it was just not making a difference at all in what we were looking at. And so we're just going to exclude them and just start at \$10,000.00 and look up.

Male: Right. You'll be able to sort of tweak the income levels.

Audience: Right.

Male: Great.

Audience: So we had where we had selected Pell recipients with AGI \$35,000.00 and above, and we're going to tweak that to – we really saw the change coming through at the \$50,000.00 level, so \$50,000.00 and above, so we're going to tweak that for next year, to look at \$50,000.00 and above.

Male: Well, great.

Audience: I know some of my regents have been tweaking. Not tweeting but tweaking. Oh, good.

Audience: All right. Thank you. We were looking at some data a little bit today and just trying to tear some of the data apart, and we noticed one group that was rather interesting. There was a certain category we have that we had 220 students in. And we just broke it down to look at – let's look at different data elements. And we looked at the data element for the parents' income, and we looked at the parents that were – in regards to their filing status, they did file, will – are going to file or will not file.

When we looked at it out, out of the 220 of them, we had a very

good EFC and Pell change. We had something like 120 of them change, which is a good yield. But when we broke it up, of the students that will not file, nobody had a change. I was – and we know that the low income, of course, doesn't need a lot of changes, but it was like so we're going to basically – to be able to refine the verification group we're doing, we will not be doing that group, and we really will save probably 80 or 90 students from doing that verification and make it a more efficient yield. So it was rather interesting.

Male: Right. I get an assist on that one. We did that in the resource room

Audience: Right. That's right.

Audience: Awesome. Well, good.

Audience: We – well, initially my director said I want to look at all of those with a negative AGI, parent AGI. And we had about 70 that fit in that criteria. And the change was not significant at all. They really were negative AGIs, so we won't be looking at those next year, which is great.

Audience: Awesome.

Male: Right. Again, something that's reasonable that doesn't sort of pan out when you actually look at it.

Audience: We actually found a couple things for our independent students with AGI \$60,000.00 to \$100,000.00. We couldn't find a lot of discrepancy there. And also \$70,000.00 to \$100,000.00 on an untaxed income, so they seem to be reporting it correctly.

Male: Okay, good.

Audience: So that's a good thing.

Audience: Yes.

Audience: We like good things. Oh, perfect.

Audience: We have some criteria where part of it is that the EFC is less than the COA. And we find that the upper range of that, like an EFC of higher than \$25,000.00, even though after verification our EFC may change by several thousand dollars, it's not going to affect their aid.

Audience: Good to know. I just love that report. Are you all enjoying the Pell and Proper Payment Report? Isn't that an awesome report? I did not lie to you. I could have been a little slower in my enthusiasm, but I did not lie about that report. It's an awesome report.

Male: Okay. And then the final question is how are you going to be able to apply the results? And particularly in terms of timing. Sort of when we look at our calendar, we encourage you to do your analysis around conference time. Do you have enough time to apply the results that you had, you know, this month to the '13/'14 institutional verification? Is this – anybody know? I see a lot of nodding, but anybody know?

Audience: I guess I would like to see the webinars offered earlier. We find that we're working on setting our criteria for '13/'14 right now because when I go back we're going to roll our data from '12/'13 to '13/'14 and start doing our system setup for '13/'14, which means our analysis has to be done.

Male: Right.

Audience: And the webinars are kind of late in the process for people who want to look at the webinars, figure out how to make the software work, do the analysis to try for us to get together as an office, sit down and discuss it, tweak our criteria and actually have it ready to go. So if we could back up the webinars a little bit – I mean, I know we don't want to do them in August while – or at the beginning of September when school is starting, but if we could start them a little bit sooner, that would be helpful.

Male: Earlier fall.

Audience: Mm-hmm.

Male: How – is there any reason not to do that amongst the other --

Audience: Do people have their data by then?

Male: Do people have their data? I mean --

Audience: Well, we don't start school till the end of September, and we still have --

Audience: Let me give the mic.

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- Audience:* We still have _____ awarded or verified.
- Audience:* Could you repeat that?
- Audience:* Sorry. We're a fall quarter school who starts at the end of September, and I think we would still have a good number verified and/or awarded by October, maybe late October. Where when you get into November, you hit the holidays and everything and just lose days right and left.
- Male:* Right.
- Audience:* For a show of hands just because we could always – because you have your regional reps, for those who really need it earlier, for example, I could do it earlier for my schools who would need it a month earlier. I could do that. By a show of hands, who would need it earlier? So we have enough of you, so that we could try and do it earlier, and our regional reps could, for those of you who need it earlier, could be prepared to do that. We could do that for you, for the '12 --
- Male:* Right. We kind of developed our core calendar based upon the fall conference just because that's when we could see you. That's when you're going to be traveling anyway. But given our presence in the fall conference, we don't know, so we might want to abandon that anchor and do it earlier.
- Audience:* That's the big thing is there – it seems like October/November, we're so busy traveling with trainings and things like that, that we'd hate to miss it. So if it could be out on the site, on a website where we could look at it at our convenience, that might be better, a prerecorded session, you could view it if you needed to.
- Audience:* And you all like the prerecorded? You like that a lot? Because we could do that. We have control. Finally on something. Not a lot but something. That's good. Thank you.
- Male:* Any other feedback on – I mean, I think some of the MLM sessions, they work best if they're less than an hour because you have – I'm sure you get tired of listening to us, and we get tired of talking. I mean, you're --
- Audience:* Me get tired of talking? No.
- Male:* Your throat gets dry. *[Laughs]*

Audience: Maybe David.

Male: Okay. Well, thanks for the feedback. We wanted to give you a tip on further analysis, and I need to sort of show you this up on the dais. We had you look at – this is off. We had you look at the records that met a single one of your criteria, the ones that equaled A or equaled B or whatever, that didn't have the combinations, and the reason for that was it's easier to look at things that wouldn't be verified if you changed them. So if one of your records met your criteria B and C, if you change your criteria B and don't change C, you're still going to select that record for verification. That's why we had you use the filter equals and just select the single ones.

Once you've done that analysis, there's a way to tweak your analysis. Say you want to be really sure before you change it, you want to look at everyone that meets criteria B before you change that. The way you would do that is you would change the filter from an equals to a contains. This will bring in all combinations that include B. But there's a problem because it brings in all of the combinations that include B. You want to put all of those combinations into a single row, or you want to obscure that. That's what you want to look at, but you don't want to look at all the different combinations separately. So how are you going to do that?

Just to get out into the – this is the same _____ Pell and Proper Payment Report. We just build the roll-up table like we did before. Where is that? We have the Ys. It's amazing how good you get at this after Holly makes you practice a million times.

Audience: I did.

Male: Okay. And where is the – okay. We change it to the average here. Get it out of the way. And so the filter here is – when we do the filter we want a not equals but contains. And we want to put B as – remember B is the one we found things on, and we looked at those other A and E and didn't find anything either. So schools – you know, you did your analysis, and you couldn't find some way to tweak, that wasn't necessarily the bad thing.

So now we have the filter that's got anything with B. But look, we've got how many rows of B? We don't want all of those rows of B. How are we going to get those all together? Well, we go back to the chart roll-up tool, and you'll see there's this group by institutional verification criteria. You need to have something there. So we can't just get rid of this yet. We need to keep

something there at all times. We can do it two different ways. One is we could bring something else over. Here we have dependency status. Bring that in, so now we have the dependent and independent students. Remember, it was the independent students that we could get rid of anyway. We found that out in the webinar training. But to get rid of all of those different combinations of A/B, B/C, whatever, we just get rid of that institutional criteria in the roll-up table and press okay.

So here, notice, we have more records than we had when we looked at it on the webinar because we have any possible combination that includes B, but we've obscured that because we've taken institutional criteria out of our roll-up table. If you would want to see everybody there by itself, just get to the chart roll-up tool again, you can use the school – select it by school. Where is that? Select it by school. Everybody should be a yes, and get rid of dependency status this time, and then you'd have the 380 of those records all in a single row.

The only trick is you have to have something in the roll-up table. You've got to have something in that group-by box, but you don't want to have the institutional criteria anymore because you don't want all of those different combinations. Does that make sense? And the reason you would do that is just to give yourself some more records, to give yourself some more confidence in your decision to tweak something.

And let's get back to the full PowerPoint. Where is that? _____ the slide show. Come on. I got the whole – I got the slideshow. From the beginning, here we go. And – okay. And the difference simply is on this slide, when we use the contains, we have all the different combinations, and the trick is you've got to delete that institutional verification criteria, but you have to have something in the group-by box. If you have nothing, the box will just be empty, and it's really hard to get it back. Okay. And then I did the live demonstration, and I did it out of order.

Okay. There's another MLM coming in December on the 10th, and our time, the 1:30 Eastern Time is kind of a time when the whole country can join us, so that's the time that we sort of focus in on. It's going to be looking at the FSA assessments. Holly and Mike have a session here on the assessment. This MLM training is going to focus on what your requirements are for the next award year. You choose two of those to do as part of your participation in the quality assurance program. It's optional for all the other schools in Title IV to do an FSA assessment. You all have to do it.

Audience: Right. And I just wanted to take a second here, and what we're going to really pay --

Male: Oh, excuse me. *[Laughter]* Sorry.

Audience: Okay. What did I do? No. I yelled at him for being a professor. That's what I get. No.

We're really going to pay particular attention on what you're required to do as a quality assurance school in regard to verification and your policies and procedures. I've been finding in a lot of your audits and program reviews that you've all been having some issues with verification, both in policies and with procedures and in some of your verification findings. So I think it's really important that we spend a little bit of time on how you should be looking for your assessments for verification. So if you haven't had a verification assessment done in a while, I really want you to be paying particular attention to that. And we're going to talk about some of those issues during that training, and I think it's really important.

And it's not just one school. It's not just two schools. It's not just three schools. It's many more than that. So that has me a little concerned, so I think we need to pay a little bit of attention to that and go over some of what those issues are and make sure that you're all compliant, alrighty, in your policies and procedures, and get you healthy. So we're going to do that. So that session, I think, is important. Alrighty. Thank you, David.

Male: Thanks. Okay. I also wanted to remind you in '13/'14, we're bringing back the random sample. This is the third time I've gone through these slides. There'll be an MLM training in January that will give schools a chance to ask questions. As we sort of get into it, something will come up, but basically the idea is we want you to draw a random sample of at least 350 records amongst undergraduates that demonstrate financial need at your school, okay. And you'll perform standard verification on those records, whether or not they're selected for your school verification or not. You will comply with the federal documentation requirements, which means an IRS retrieval through the FAFSA or an IRS transcript for the tax information, just for those 350.

Question?

Audience: The _____, how does that impact that? It only gets selected for staff _____.

Male: Okay. The question is how does the CPS verification flags factor into your sample. They don't. When you draw a record into the sample, whether they have B1, B67, you treat it as if it was B1. It doesn't matter what it actually is. You treat it as if it's B1, and you complete that standard verification for that record. Good question, okay.

Okay. We've also shared with you that we'd like to encourage you, you're not required, but to document the identify of records that have a flag of V4 or V5. That is something that you could choose to add to your institutional verification procedures, if you choose to. Your QA school, you can develop your own documentation requirements for that information.

Audience: And David, remember, for V4 and V5, we're only asking you to do the identity statement only, not the other items under V4 or V5. We're just asking you if you choose, we're encouraging, not requiring, you just to – to verify that identity issue. We don't expect there to be a lot of them. You can run something in your computer system to see how many are hitting that edit anyway ahead of time if you want to relieve the stress, if you think there's a lot of them. We don't think there are going to be.

We suspect it's probably a real issue if they're hitting four or five. We have a system in place. We really think it's a problem. Because you're exempt from acceptable documentation, you get to decide what that acceptable documentation could be to identify that identity, something that you think is reasonable, and it's only the identity that we're asking you to verify. The important thing with that is make sure you have it clearly identified in your policies and procedures. You're looking confused. Yes?

Audience: You just said we could – as it says up there, establish our own documentation.

Audience: Yes.

Audience: I thought part of the point of doing a federal – and I know this is not the exact issue. But I thought part of the process of doing the federal verification on our sample, we had to follow the federal guidelines?

- Audience:* Right. But we're only asking you to do V1 for your sample. Your sampling is only required to do V1. Not V4. Not V5. V4 and –
- Audience:* *[Inaudible comment].*
- Audience:* That's right. V4 and V5 is unique. It's just a unique thing.
- Male:* Right. In hindsight, perhaps these two points should be on the same slide.
- Audience:* Speak into the mic.
- Audience:* We need to make the clarification that for your random sample of 350, we have to use the federal documentation requirements as V1. But for your own institutional verification, you can choose your own documentation for your – those that meet your criteria. And that's important.
- Audience:* And that's correct. And that's where we're putting V4 and V5 under, as if it were your own institutional.
- Audience:* So it sounds like then for '13/'14, we definitely want to – in doing our verification criteria, follow or mirror to some extent what the Feds are doing, unless you want to re-create numerous tracking items for requesting information from the students, right? Okay. So the Feds are going to these different verification groups, right?
- Audience:* Yes.
- Audience:* So being QA, we get to select our own students, but we have to verify them in the way the Feds are verifying them? No. But for this random sample we do, so unless people like a lot of extra work, I'm going to recommend that we – our school mirror what the Feds are doing as far as documentation and so forth because I don't want to re-create two different types of documentation requirements for this group of students and then for the rest of my students.
- Audience:* Well, that's something QA schools have always had to do. I mean, that's nothing different than any other random sample year since the beginning of this program. So I don't know why that would stress you out any more than any other random sample year. This has been nothing different.
- Audience:* But we have always mirrored that.

- Male:* Oh, you yourself as an institution has always done that.
- Audience:* As far as documentation and the types of documentation.
- Male:* So that's something you've done as an institution in the past. That's your choice.
- Audience:* *[Inaudible comment].*
- Male:* That's your choice as an institution. I can't tell you to do that or not to do that. That's your choice.
- Audience:* *[Inaudible comment].*
- Male:* Oh, are other schools doing that, are other – let's ask the question. I think it's a good question. Are other schools going to mirror the CPS edits and not do their own institutional verification next year? We have one other school doing that.
- Audience:* We've always _____.
- Male:* You've always done that?
- Audience:* *[Inaudible comment].*
- Male:* Okay. So you have one other school doing the same thing. Okay. We'll have – you do? So we have three – four schools? Five. Okay. Don't be embarrassed. Raise your hands if you do that. And we just have one hand to represent one school, so you have five.
- Male:* Six?
- Audience:* Six. Raise your hand so I can – raise your hands high if you mirror the CPS edits in a random sample, so this gal does not feel alone. So we have one, two, three, four, five, six, seven, eight, nine. That's a lot more than just two. So you have nine colleagues that do the same thing. You feel better? She's feeling better. Thank you for sharing. There's nothing wrong with it. You can do that.
- Audience:* It's just a safer bet.
- Audience:* You know, for some people it's easy but not for everybody. Some people have the systems that are setup that can do that. Okay. Here's a mic. I'm not sure what I would do, to be honest with you.

Audience: [Inaudible comment].

Audience: It's a big room.

Audience: Okay. I think your previous slide though is – at least for me, it somewhat combines the two things that are needed for the V4. There's a – there's identity, which is basically a copy of a driver's license, state issued thing, and then there is a statement of educational purpose. When you say just the identity statement, do you mean just the identity portion of it or the identity and the statement of educational purpose? Because identity statement, to me, is both things, although identity itself – this is what the Feds – okay. We went through the verification.

The Feds are actually going to provide the language that they want – not want – are going to expect every school to use and understand verification to have the students sign. That language for the statement of educational purpose is going to be given to schools at some point in the next two weeks, they said. However, the identity portion of it is simply a copy of either a driver's license, state-issued, passport, that type of thing. There's two separate issues under V4. So if you want to – if you want us to do V4, then technically we have to do both of them, and it would require if you wanted to do your own statement of educational purpose for us to re-create the wheel, when really why not just use the Feds.

Male: It was my understanding that we were interested in both parts of V4, and we just weren't interested in the additional parts, if you're also – I mean, V5 is basically V4 plus. We're not interested in the plus parts of V5. So it's the identity, the ID and the educational statement. But as a QA school, you can do – I mean, there's – the reason they're flagged is that they have a reasonable question of the identity, not the educational statement.

Audience: Okay.

Audience: Okay. Thank you. Well, thank you, that was news to me.

Male: So I guess we could open it up for further questions on this or other questions.

Audience: Okay. Just for clarification. So for clarification, QA schools are required or have an option for the V4 and V5. It's optional.

Male: Right.

Audience: Okay. Strongly encouraged but optional, so you might as well do it. Just wanted to be sure.

Audience: I mean, it is optional, but we're encouraging you because we do believe that the identity – when we mark somebody for a four or five, we have good reason to believe there's a problem with that file, and it's not a random selection. We really believe there is truly a problem with that file. So that's why we're strongly encouraging you to look for that identity of that person. We – again, we don't think there's a lot of them, and we don't think it's going to be a big deal. Oh, lord, that could come bite me in the butt. But that's why we're asking you to take a look.

And again, you could ask your systems people right upfront how many people that really is to see if it's a big number. And if it's a big number, call your rep and say what should I do, and we can talk it through with you. But I don't think it's going to be a lot of people, I really don't. And again, you know, using a statement that we provide you, that's good advice, just to use the statement we gave you, why reinvent the wheel. I agree. And thank you for clarifying that; I didn't realize that. And then collecting some kind of identity from that person is a good idea, but what you collect is your choice and how you collect it is your choice. And that will be good.

Audience: All right. Going back to the pulling the random sample, I know there will be as many answers as there are schools in the room, but what's the typical best time of the year to start pulling that random sample in school opinions?

Male: Right. Basically the best time to pull the random sample is when you can identify people who are actually going to show up in the fall or whenever that award year starts, and you have enough time to complete the verification exercise without making everybody crazy. So you've got to do this process of verifying that information. But the later you wait, the more sure you're going to be that those people that are still in the queue are actually going to show up. So those two things.

Audience: *[Inaudible comment].*

Male: Yeah, I mean, basically it would be early summer, to start early summer.

Audience: *[Inaudible comment].*

Male: When do classes start?

Audience: [Inaudible comment].

Male: Right. So then probably late May or early June.

Audience: Okay. We ready?

Audience: If you have to, on the random sample, verify them based on the federal information now or the federal guidelines, they don't have a worksheet out there. So are we supposed to use our own worksheet?

Male: Right.

Audience: And with what I'm reading, we're not really providing really with worksheets anymore. We're just providing you guidance for worksheets, so you really are now going to have to be creating your own worksheets. Well, we're providing you language. Aren't we nice? So that's – but most of you have been doing that for quite a while. And maybe we should talk about – a mic – we're going to need a mic over there.

Audience: [Inaudible comment].

Audience: And then I'll get to you, I promise. Maybe we should think about ways that we could share worksheets amongst ourselves as QA schools. So maybe we should think about a way to upload that and share. Do you guys like that idea? So let me think about how to do that. I'll talk to **Warren** and see if there's a way we can put sample worksheets out there that you all can share with each other. I'll write myself a note right now while we have this question going in, and I know we have a question over there. And we'll get over there.

Audience: Actually I don't have a question. I just wanted to comment. We have been in QA for quite a while, and a couple of years ago when we had a random sample, we didn't select our students until the middle of summer, and we were in a big rush to get it done. And we had students that were now all of the sudden owing money, and it was nightmarish. So what we're going to try and do this year is actually select them earlier when we do our QA selection. As best we can, we're going to over-select, like – we typically have done, I don't know, 800 or 1,000 even students we select offhand, knowing that not all of them are going to come. And then when

we hit our 350, we actually will back some of that off.

The other thing we're doing because we do have to follow the standard regulations, we're actually going to have two separate verification worksheets. One that has our QA information requested on it, and one of them that does tell them how to go out and get the transcript. So we can track that then separately in our system and know – you know, direct the student to the correct verifications and the correct directions on what documentation they need. So that's what we're doing.

Audience: So this is going back to the random sample of 350. So if we select 500 people in May or June to do the random sample on, and they're enrolled, and they end up not coming in the fall, they cannot be counted in the random sample, or is it – or can they be counted because they were enrolled at the time we did pull the random sample?

Male: Well, do they provide you with documentation or not?

Audience: I'm sorry, I didn't hear.

Male: I mean, they brought into the random sample. The key part is not being enrolled. It's them providing you with the documentation to correct the _____.

Audience: So if we're pulling a random sample of people who are enrolled in May or June, and they're enrolled for fall, and they provide the documentation to us, but they don't come in the fall for some reason, we can still include them in our random sample?

Male: Yeah. They don't have to enroll. You just have to have a leverage on them to provide that because if they don't provide you with that documentation, you can't use it in your analysis. And you don't turn into a pumpkin, we don't kick you out of the QA program if we have 349 records for your analysis; 348 and you're out of here. *[Laughs]* But the idea of 350 is – I mean, we've found – especially this fall's analysis I think emphasizes if you don't have enough records in a certain row, you can't evaluate that piece of information. And the 350, there's nothing magic about it. It's just that was the number that we thought you'd be able to cover most of the boxes you'd be able to cover, while still having a reasonable amount of workload.

Any school that's willing to do a larger random sample, you'll get better data analysis if you have a larger random sample. It used to

– you used to have a limit of 1,500 records. You could bring it in two at a time. Now you have 1,000. I mean, so the larger your random sample is, the more useful it will be for your analysis, but we realize that there's a lot of work in getting that data from the students.

Audience: Okay. I have a question also here. Can I ask – and – oh, you go over here, and then I'll do it.

Audience: *[Inaudible comment].*

Audience: This has to do with the sample. Thank you. I appreciate you sharing the mic. I have a sampling question. And the school, when they're doing their sample, the fact that the student doesn't come, they obviously can't use that. So it's only the records where the students come for that 350. I mean, they're going to upload those records of those students who actually registered and came to their institution.

Male: Well, you could use the information if you've documented it. There's an _____.

Audience: Not if they didn't come.

Male: Why not?

Audience: And if they didn't come – but they didn't come to that institution.

Male: It's got a valid EFC. It's got their school code on it. They can use it.

Audience: *[Inaudible comment].*

Audience: But they didn't come to that institution, so --

Male: It doesn't matter. It doesn't matter.

Audience: But that profile of that _____ _____ _____.

Audience: *[Inaudible comment].*

Audience: That's right. You're not going to have a paid-on record because they didn't come to that institution.

Male: You'll have a transaction that's documented. You will say that will be the paid-on transaction.

Audience: David, I've never had my schools do that. Only those students that came to their institution were put up into – all of my regions, one, two and five, are students that actually came to that institution.

Male: Well, that's one way of expanding the sample. If you've got documentation and use it.

Audience: We'll have to discuss it and get back to you because we definitely have a dispute because my schools aren't doing that.

Audience: And we'll have a discussion and get back to you on that particular issue.

Male: I'll cough at Holly and see what happens. *[Laughter]*

Audience: So, wow, so my question is actually just kind of for the audience about people that are trying and experimenting with really fun or innovative criteria. This year we started moving towards isolated verification items on solely verifying households and just doing income and using cross-year edit comment codes as part of our selection criteria. And I was just – if there's people out there that are really proud of or find their criteria really innovative, I would love to give you my business card.

Audience: Anyone want to share?

Audience: He's from Oregon State.

Audience: Is there a reason why since we provide you all with our QA criteria, is there a reason why you couldn't provide all of us with our QA criteria, so we can see what other schools are doing? We don't have to put a name on the school, but just throw out some criteria, so we have an idea of what other schools are doing just to get other ideas?

Male: Actually the report that just got cleared the week before Thanksgiving identifies 25 criteria that we identified as being sort of the most efficient because like 10 that had the highest Pell – average Pell change, 10 that had the highest percentage of Pell changes, and then the 10 that had the highest percentage of EFC changes. The EFC changes were the most institution specific, but those five very efficient criteria, all five of them, over 98 percent of the records that they selected had a change. So in the report, we identify that criteria, and we have a description of it. And then we also use the '10/' 11 random sample data when we could to see how

it performed program wide.

I mean, some of those very efficient criteria were school specific, and some were translated better with the random sample data that they'd be good for anybody. That report will be available on the QA website. Warren _____ needs to post it, and I need to make sure I have all of the mother-may-Is in place. But I've got **Jim Runtzie's** mother-may-I, so I think I got trump no matter what.

Audience: [Inaudible comment].

Male: It should be up in December.

Audience: Here you go.

Audience: Sorry. One other question. I'm wondering if anybody's doing any QA analysis on asset information.

Audience: [Inaudible comment].

Male: I'll make sure I get my son, who's a senior in high school, to apply to your schools.

Audience: Business assets, savings?

Audience: [Inaudible comment].

Audience: Oh, good. Let's share.

Audience: We do asset on our normal verification, but when we do our selection, we don't do asset follow ups on that. But when we do our normal – we do 100 percent verification on all incoming students, so we do asset information at that time.

Audience: Okay. So like all freshmen?

Audience: All freshmen, all transfers, anybody that's new to the school.

Audience: You just do it that one time, and then you know that one time.

Audience: We just incorporated asking for the asset information on our worksheet because we use an electronic form, and it's got some skip logic in there and that sort of thing. But we're asking them for household size and all the untaxed income and that sort of stuff. And then we just finish it off with asking for the assets.

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- Audience:* For those that document the – or look at the assets, just what documentation do you collect?
- Audience:* What is the documentation you collect?
- Audience:* We use the tax return to see what kind of assets are reported, and then we do manual follow ups with those and sale, okay, you've reported on your tax return you're showing rental income, but you didn't report any asset for that, or you're showing a high interest rate and high interest earnings, and you reported \$10.00 in savings. We say please explain that. And so – and at that time we may ask for appraisals on property, bank statements, whatever. If we don't get good information then we'll ask for further documentation.
- Audience:* So you start out with self certification, and then you might --
- Audience:* Self certification, and then we go – if it doesn't sound reasonable, then we'll go to some more stiff follow up.
- Audience:* She has another question. Does anybody have any other comments on the assets? All right. We'll get to your question.
- Audience:* If a student changes their asset information from their original _____, we would request an asset form to verify why they're changing the assets. And we just basically re-ask the asset questions on the FAFSA. We created our own form. And then we also look at the tax return dividend and interest income. If it doesn't match up, then we request that asset form.
- Audience:* We pretty much do the same thing. We look at it as discrepant information if we see no assets reported and it's not blank. That's a new thing that's come in; we have to check that, that they haven't been going through skip logic. But if they were supposed to report assets and did and reported them as either zero or low, and they have a lot of income that looks like it's coming from that, we question it. We go out.
- Audience:* Okay. My --
- Audience:* She has another asset one.
- Audience:* On our asset stuff, we have it on a worksheet that we created, and we have a lot of rental properties, rental income that we find from the tax return. So we did that little study, but I can't remember what it was. I can't remember what the criteria was that we setup. But when we reviewed the records, if we were to just look at the

tax transcripts without looking at like the rental properties and that, it did make a big impact, so we're going to keep asking for it on our worksheet, and then verifying that it makes sense because then it becomes conflicting information.

Audience: Anymore asset comments from the first question? Because we have another question here, I believe.

Audience: It's an asset question. And I think I heard someone over there mention a piece of this, but has anyone figured out a way to really utilize the asset threshold flags to our benefit? *[Laughs]* I mean, if it says something and it's supposed to trigger you to go look for something else, we just haven't had – we haven't figured out how to get a handle on that to really use it for our benefit.

Audience: We need to figure out a way to have a tweet amongst QA schools, so QA schools can talk to each other.

Audience: We do.

Audience: *[Inaudible comment]*.

Audience: Right. I'd like a QA Facebook page or something. I'm going to tell **Barbara** there's an interest for that, so we can have these kind of discussions among ourselves. Would you guys like that? Show me hands, so I can go back and let Barbara know there's an actual interest. All right. Okay. We all saw that. Okay. Thank you. Oh, question?

Audience: *[Inaudible comment]*.

Audience: The e-mail listserv? I'm – we could check that. I know there's an – that is an issue. That is a problem with that. I know Warren has been trying to figure that out for a while, so that – I think the department's moving more towards Facebook and Twitter. I think we have a better chance going that route than we do e-mail listserv because we've been trying to do a listserv, and we've had roadblocks with that. So I think honestly we have a better chance with either the Twitter or the Facebook because we've had roadblocks with the e-mail.

Audience: *[Inaudible comment]*.

Male: Uh-uh. But we have tried that e-mail, and I know what you're saying. It's so much nicer because we had the QA, the main QA one, but we did have a problem with that. But I'll talk to Warren

because he's our master of all of that. And we'll see what we can come up with, and I'll get back to you guys.

Audience: I just wanted to get some feedback from some of the other schools who may have been allowing students to – who use the data retrieval to and had that 02 code either not to submit tax returns or to omit them from even being selected for verification. In this past year when we did our analysis, right before – well, actually when we ran a little quick study before we started selected students, we didn't have a lot who actually used the tool and had an 02 code there. We went ahead and continued to include them in our selection, and we didn't exclude anybody, and they had to turn the same documents in as everyone else.

We still were allowing students to turn in tax returns this year, and we did do the data retrieval study. So I was just wondering with other schools if several of you are finding that it's beneficial not to ask them for the tax returns, or if you're just taking them out of your selection criteria altogether?

Audience: What – did you find many changes?

Audience: We actually found --

Audience: Because other people are going to share, so I'm curious to see if you found any changes.

Audience: So far with actually using the Pell and Proper Payment Report and then also looking – because when we loaded our data for David right before we actually loaded everyone else, and we had to put it back in there because David forgot to tell us to _____.

Male: Thank you. Thank you.

Audience: But when we first loaded it, the flat file for the IRS study, we actually – I ran the Pell and Proper Payment Report then, and then I actually just did some analysis with using some of the standard reports and some of the custom reports at that time. So far what we're finding is obviously as maybe some other people have found, that the vast majority of changes are to parent income or are to student wages because that's something that they can't properly report by using that tool. And then of course we have a lot of people who – we are requesting asset information on the worksheets, so we had a lot of asset changes. And we did also have a lot of people who did not – had a lot of changes obviously to whether or not they can follow the 1040A or EZ.

So right now, based on the numbers that we have, we are seeing some changes there that we wouldn't have been able to make if we had not asked for W2s and other things.

Male: And the EFC changed?

Audience: Yeah, we were seeing some pretty big changes there with the wages being different and also some students who when we did flip the asset threshold question, they actually did have some changes there. So we're just trying to get some feedback from other people, so we can see maybe if it's not drastic enough, then maybe we don't really need to make any changes.

Audience: What did other people find that did the study? Oh, raise your hand. I'm curious. Thank you. A sneak preview.

Audience: We actually – if they had done the data retrieval with no changes, we did not request tax forms. And when we did our analysis, we didn't see any significant problems with that, so we were going to continue to do that for next year. We also found that we had been asking for W2s for both students and parents, but the amount of change that occurred with the students was not significant enough to continue to ask for W2s. But we will continue to ask for W2s with the parents and in the combination with the data retrieval.

Audience: Anybody else data retrieval results?

Audience: We selected regardless of whether they had used the data retrieval tool, but we didn't request tax returns if they did use the tool. What we found was there was a very large group who did – we did give them information at the time we went out, asking of the tax returns telling them that if they did use the IRS data retrieval tool now, they would not have to turn it in. And we had a large percentage of them who did the data retrieval tool later. And we were able to exempt them from having to turn in a tax return. So for us it has reduced our workload a little bit.

Audience: We actually sent the e-mail out four times for all 4,000 students, and maybe like 300 of them did it. _____, so it really didn't work with our students, but we sent them an e-mail reminder and said, hey, you won't get selected for verification if you just do this, and it did not actually work. So that's what – that's another reason why _____.

Audience: We did use the data retrieval tool for our students. At first they were a little resistant to it. We had lots of complaints. “Why didn’t you tell us?” We did, we did, we did. We got through that. It was smooth as butter. I’m talking we stayed caught up within four days for months, so it was really good. I think there are a lot of students that – we had a lot of students that couldn’t get a copy of it, but their parents said I filed it, but they lost it. So I think there’s lots of abuse that goes on out there. And even with a paper copy of a tax return, it’s not as legitimate as we think it is. I applaud the government for – I mean, the department for going through the processes that they did because I think it’s really benefited us.

Male: Well, it is almost 6:00, so maybe just one more question.

Audience: I was just going to say after FSA last year, we inadvertently had done the study for ‘11/’12. We went back and looked at individuals who had done the data retrieval, but we had also asked them for the tax return after the fact, type of thing. In over 100 cases, we did not find one difference, so for ‘12/’13, we were allowing people to fall out of verification if they did the data retrieval.

Male: Good. That makes sense. Well, thank you everybody so much for coming, especially at the end of the day. Enjoy the rest of the conference.

[End of Audio]