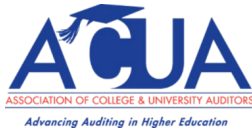


Tuition and Fees Refund Controls

Presented by:
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- Don't forget to connect with us on social media!



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Objectives of Today's Training

- 1) Provide Overview of Audit Steps & Scope.
- 2) Overview of Benchmarking Steps & Benchmarking Results
- 3) Overview of DEI Benchmarking
- 4) Risks
- 5) Control Best Practices and Resources
- 6) Q&A

Objective 1 – Overview of Audit

As a result of restrictions on campus operations as a result of Covid mandates in Oregon, many on-campus services were physically closed to students for a period of time until mandates changed to allow certain facilities and services to be open again for in-person operations.

Due to these operational impacts the Board of Trustees either prorated some of the mandatory fees to students and/or authorized full refunds to students of certain fees due to these impacts on services.

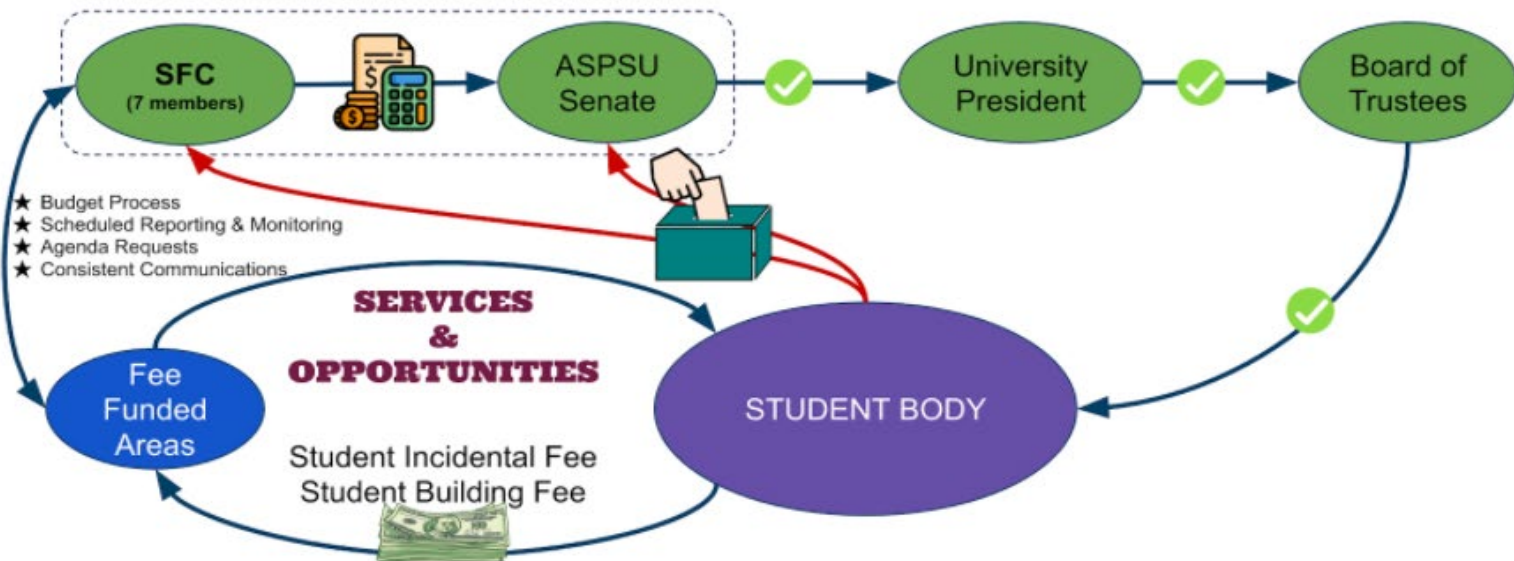
We (Internal Audit) selected refunding controls as higher risk because of these impacts and hence started the audit.

Objective 1 – Overview of Audit

Timeframe under audit – FY18 through FY20.

So, we looked at processes “pre-Covid” and “during Covid”

Objective 1 – Overview of Audit



This provides an overview of the governance process for establishing and updating fees. There were ~8,000 detail codes used in Banner for setting up and tracking fees.

Objective 1 – Overview of Audit – Que A Hard Left

As a result of audit planning/risk assessment interviews, we heard a consistent theme from managers about a process that left a lot of managers with questions and a desire for an independent review.



Objective 1 – Overview of Audit

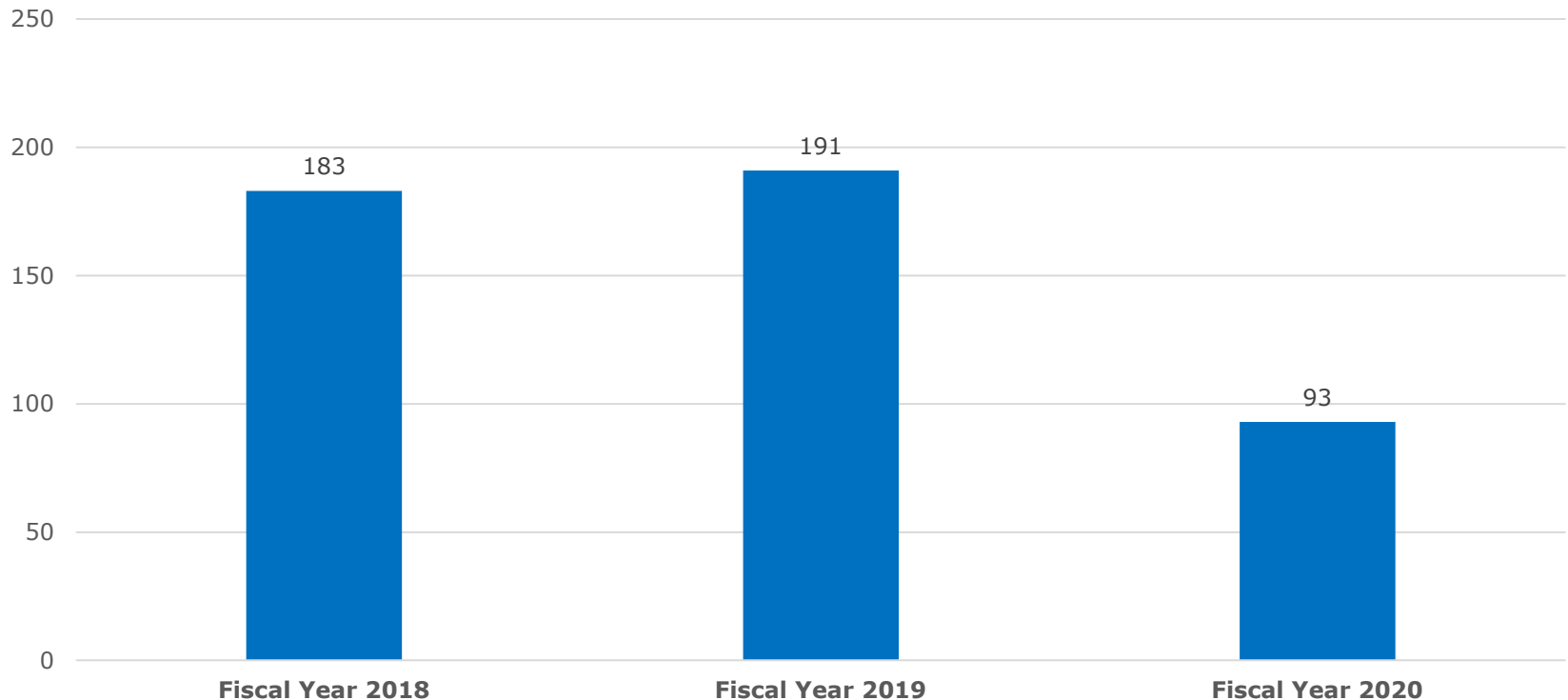
The hard left led us to looking at refunds and related control processes over **Retroactive Withdrawals** or what some institutions call Hardship Withdrawals.

Examples include:

- **Death in the family:** Provide a copy of the obituary, funeral announcement or death certificate.
- **Disabling illness or injury to the student.** Have your licensed health care professional submit a statement documenting your condition.
- **Disabling illness or injury to an immediate family member that required student's care:** Have your family member's licensed health care professional submit a statement documenting their condition.
- **Emotional or mental health issue (for the student) that required professional care:** Have your mental health counselor submit a statement documenting your condition.
- **Other unusual circumstances beyond your control:** Provide any documentation needed to support your claim, if possible. Examples: if a fire or natural disaster occurred at your home, a statement from your insurance agent. If involving a legal matter, a statement from your attorney or the police report. If your problem is related to work, a supporting letter from your employer.

Objective 2 – Benchmarking

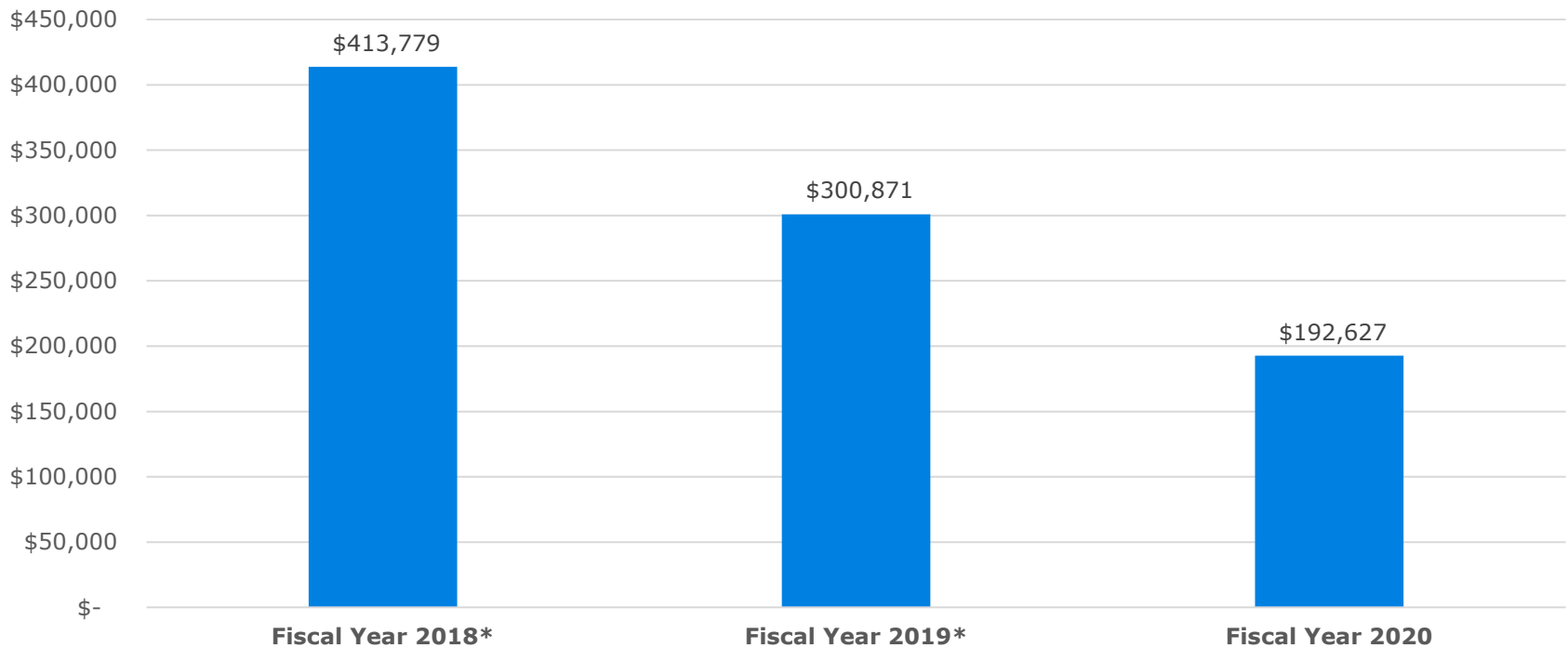
**# of SSC Petitions Approved
Fiscal Years 2018-2020**



SSC = indicates undergraduate retroactive withdrawal petitions.

Objective 2 – Benchmarking

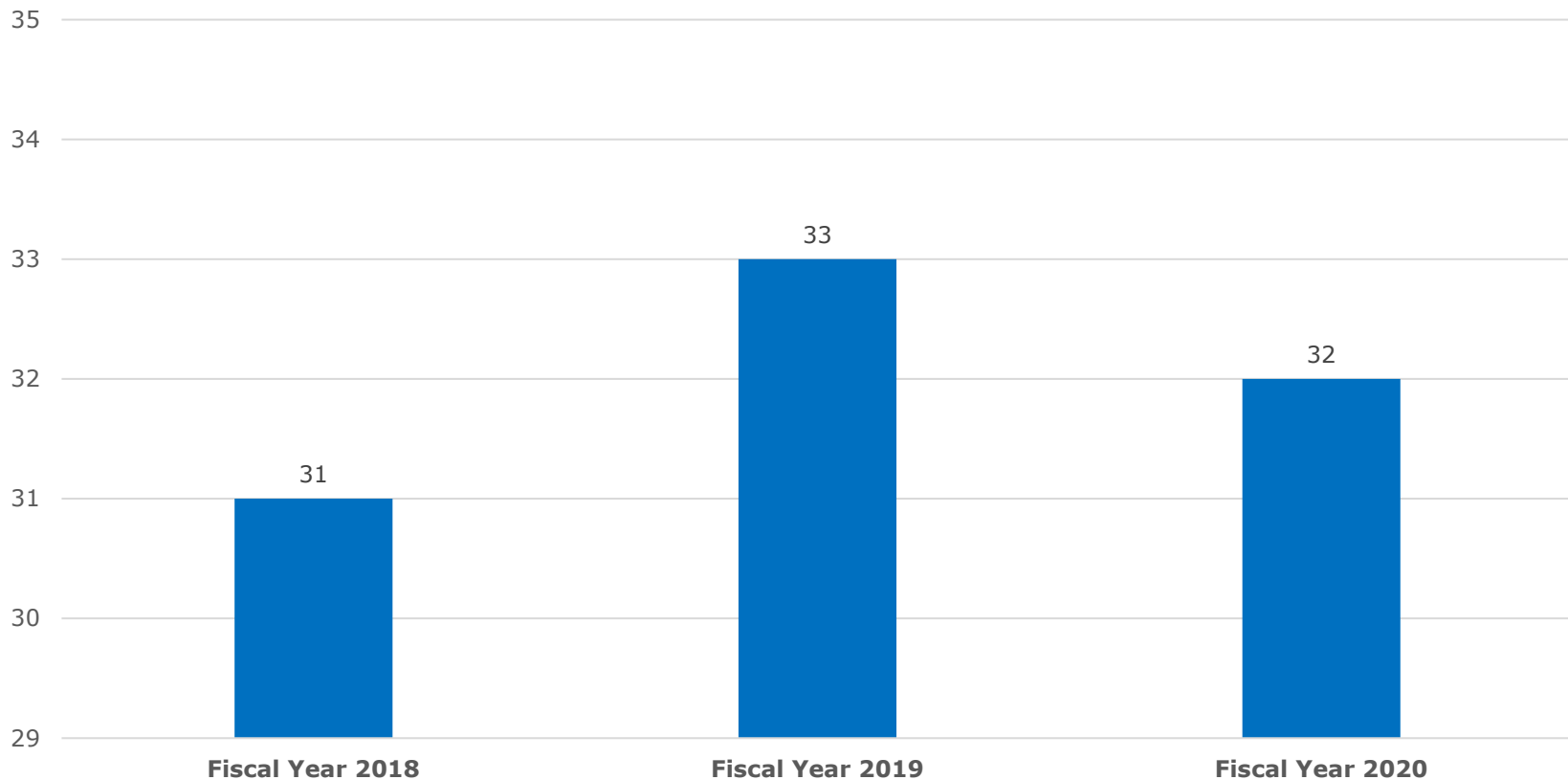
**Amount of Tuition & Fees
Refunded from Approved SSC Petitions
Fiscal Years 2018-2020**



* = Indicates extrapolated estimate based on sampling & testing 25% of that year's petitions.

Objective 2 – Benchmarking

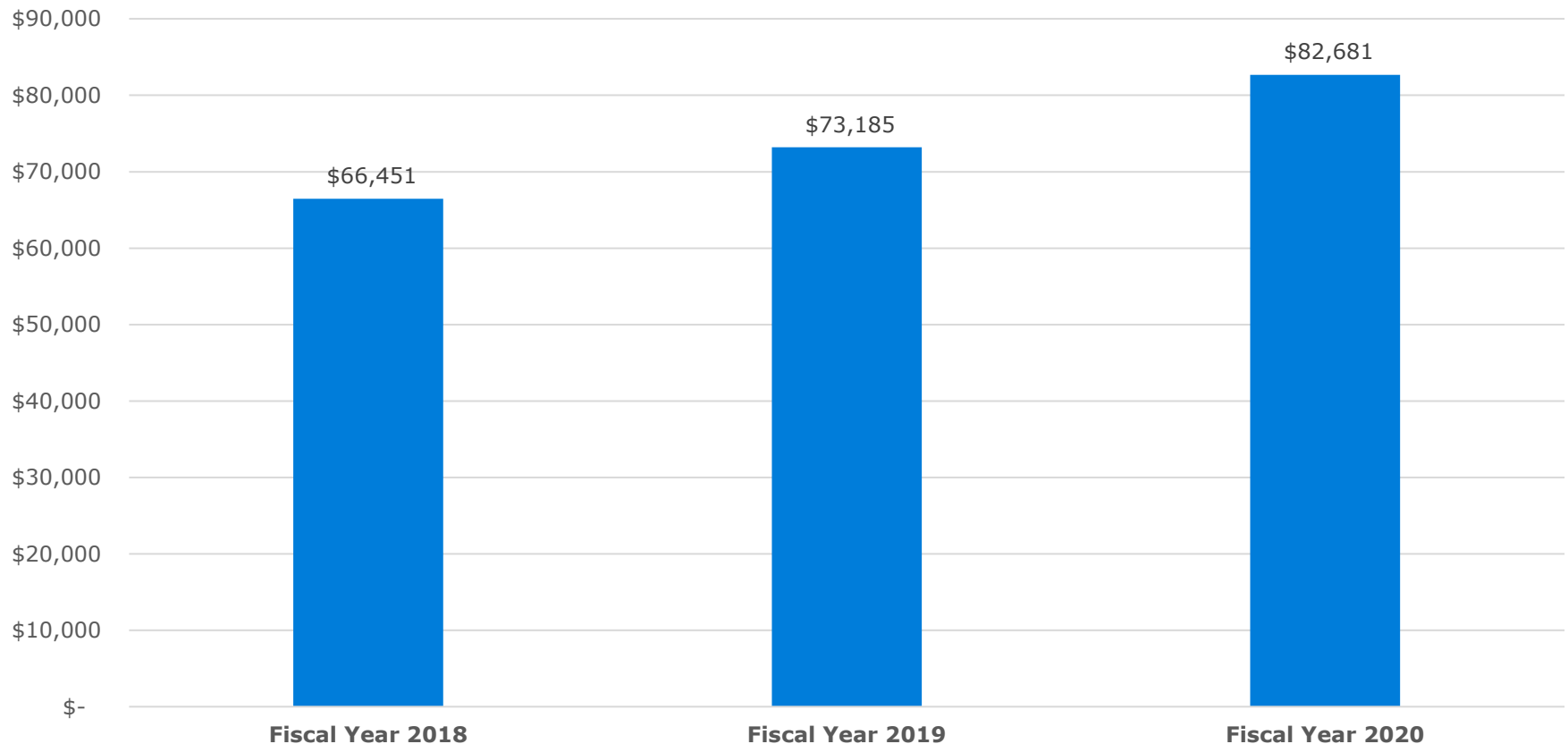
of Grad Council Refunds Approved



Grad Council = indicates graduate level students' retroactive withdrawal petitions.

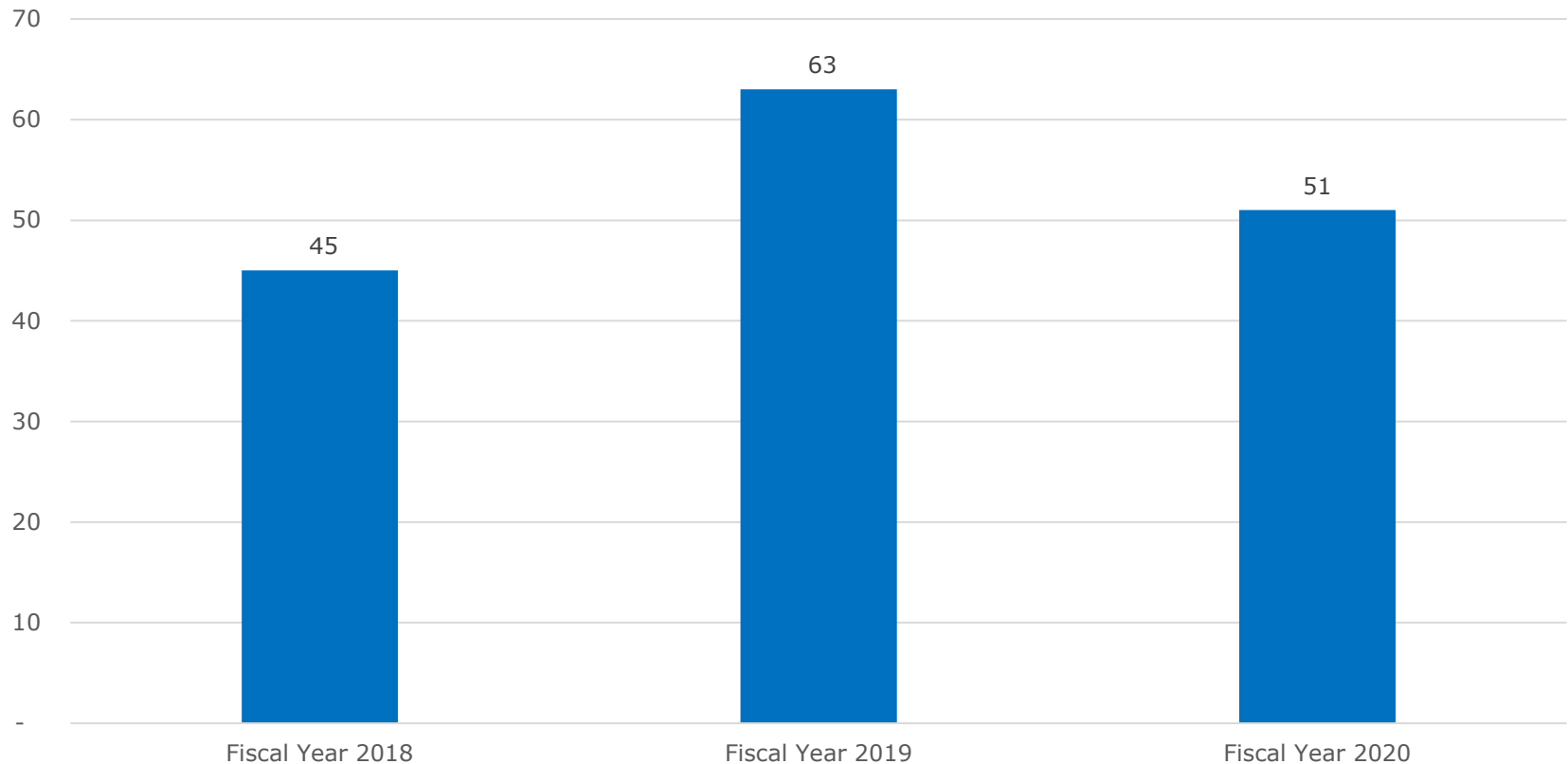
Objective 2 – Benchmarking

**Amount of Tuition & Fees
Refunded from Approved Grad Council Petitions**



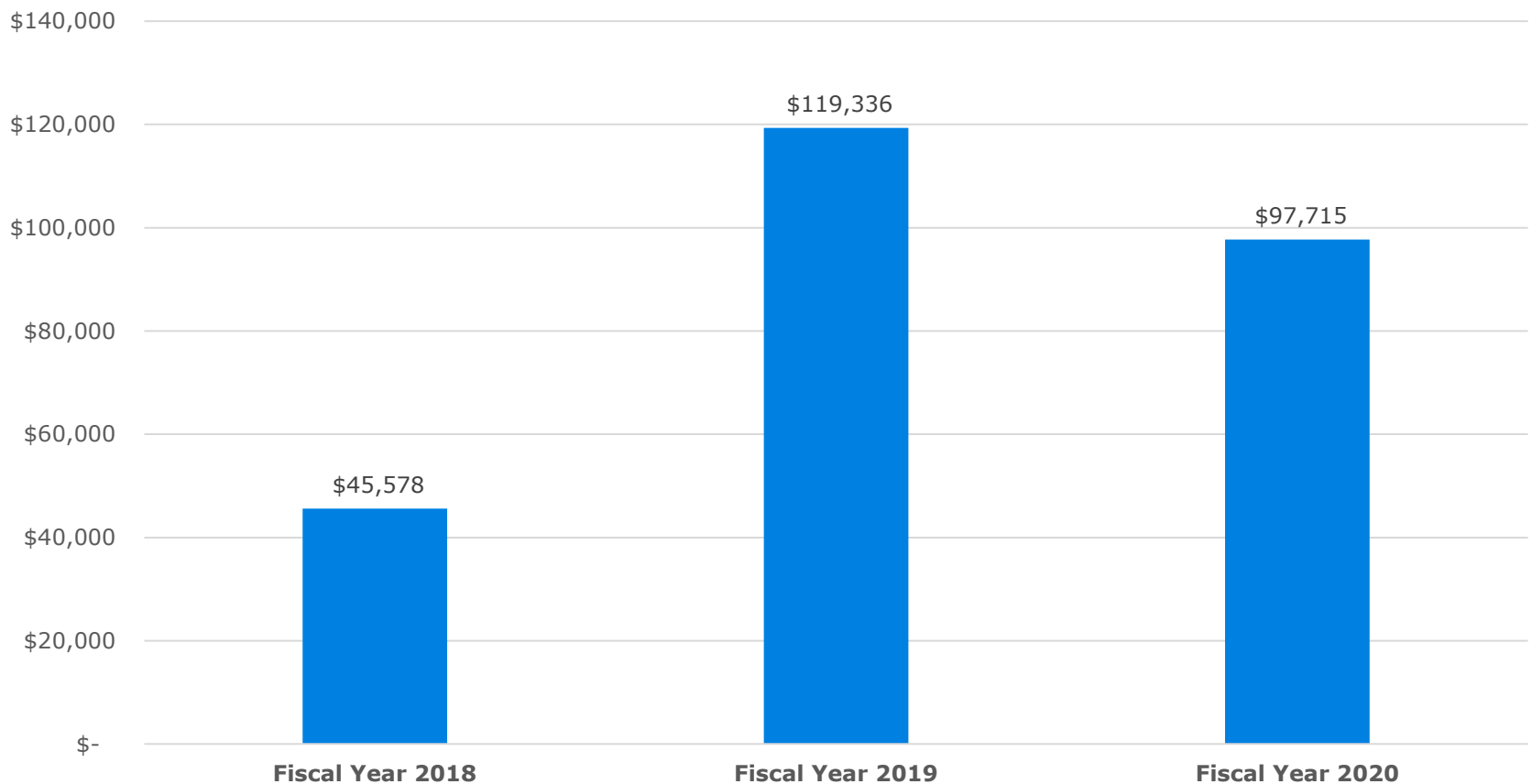
Objective 2 – Benchmarking

**# of Title IX/Dean Refunds Approved
Fiscal Years 2018-2020**



Objective 2 – Benchmarking

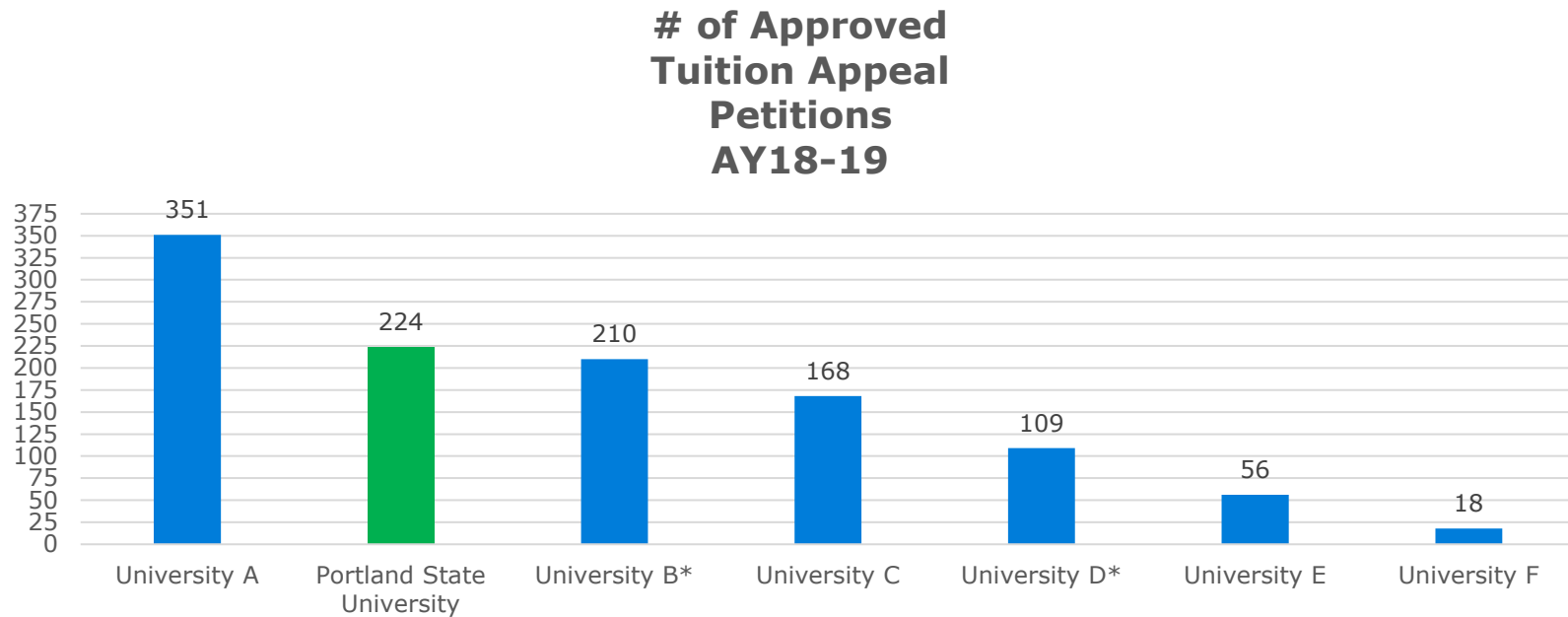
Amount of Tuition & Fees Refunded from Approved Title IX and Administrative Petitions



Objective 2 – Benchmarking

Petition Type	Time Period	% Denied
SSC	Fiscal Year 2018	26%
SSC	Fiscal Year 2019	25%
SSC	Fiscal Year 2020	47%
Grad Council	Academic Year 2017-18	10%
Grad Council	Academic Year 2018-19	6%
Grad Council	Academic Year 2019-20	5%

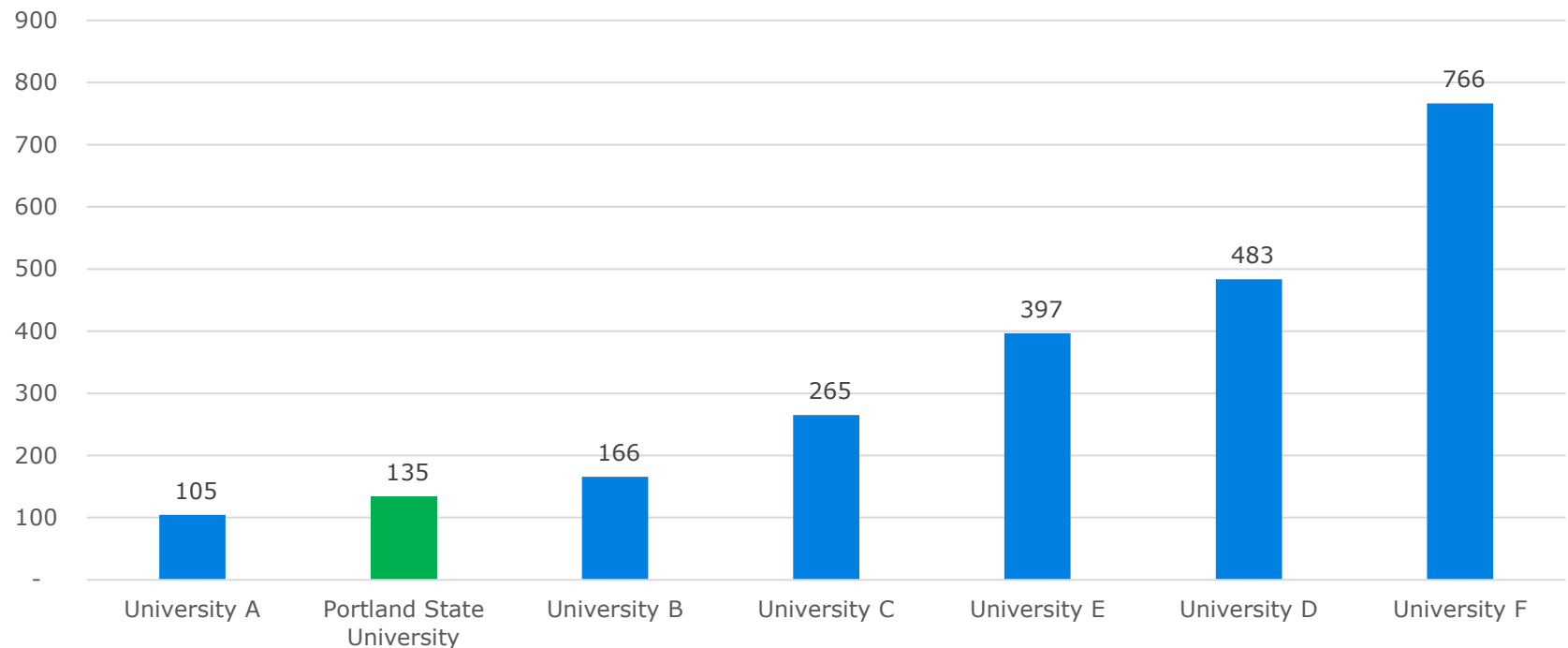
Objective 2 – Benchmarking



* = denotes that these petition numbers are for undergraduate students only, but all others include graduate and undergraduate petitions.

Objective 2 – Benchmarking

Ratio of Student Enrollment AY 18-19 to # Petitions



This graph indicates that for every 115 students PSU served during academic year 2018-19, 1 of those students submitted a petition to the PSU SSC or Grad Council that was approved resulting in a refund of tuition and fees back to the student as compared to University F that approved 1 petition for every 766 students they served in academic year 2018-19.

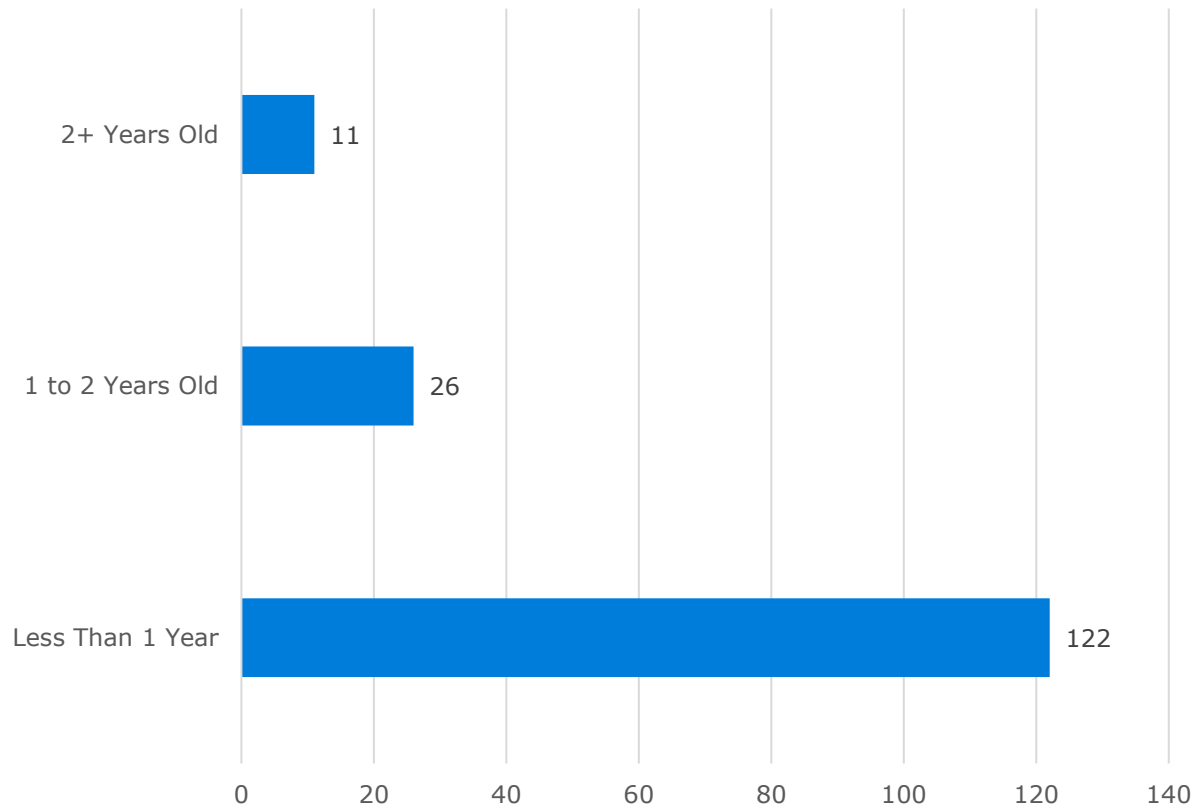
Objective 2 – Benchmarking

Steps taken when we looked at our institution's retroactive withdrawal practices:

- 1) How "old" could a petition be that would be processed?** Petition filed within **1 year** was standard. We did find some institutions that required petition to be filed within 60 to 130 days of the last day of classes of the applicable term/semester.
- 2) Is there a fee charged for processing a hardship petition?** Our institution did not charge a fee; however, we found that it was typical that institutions charged \$20 to \$40 for processing a petition.

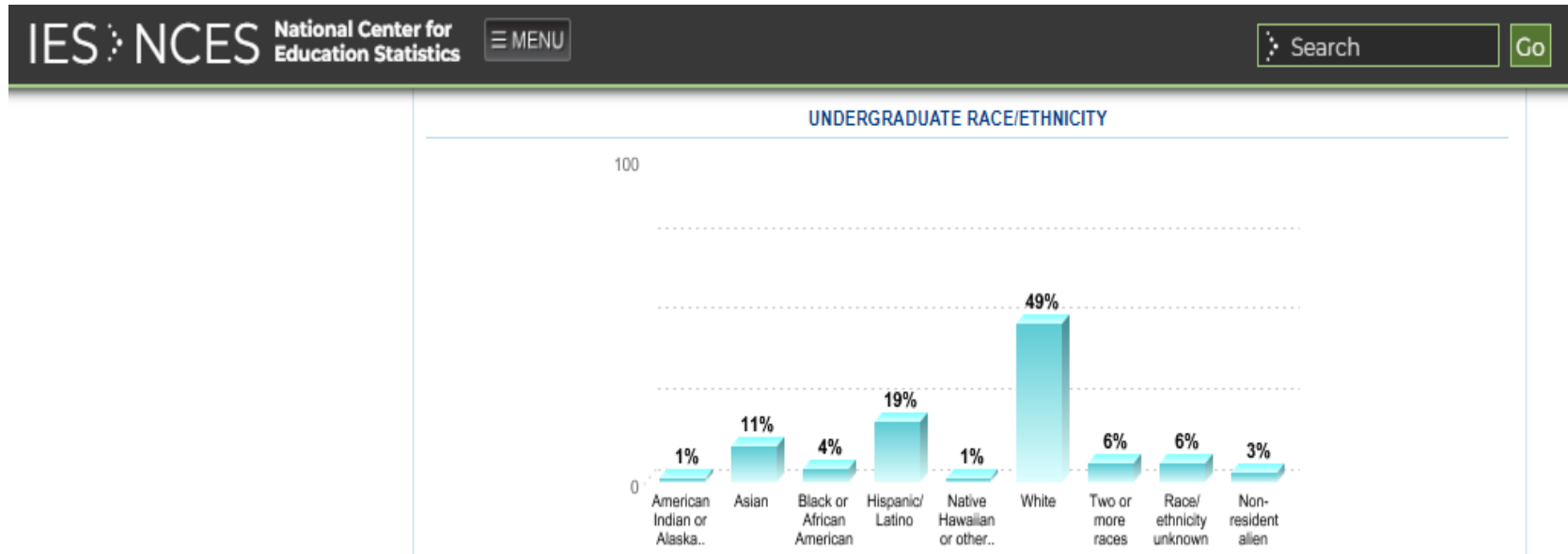
Objective 2 – Benchmarking

of Approved Petitions by Length of Time Since Incident of Petition



Note – This is a theoretical example of how demographics could potentially be analyzed.

Objective 3 – DEI Benchmarking



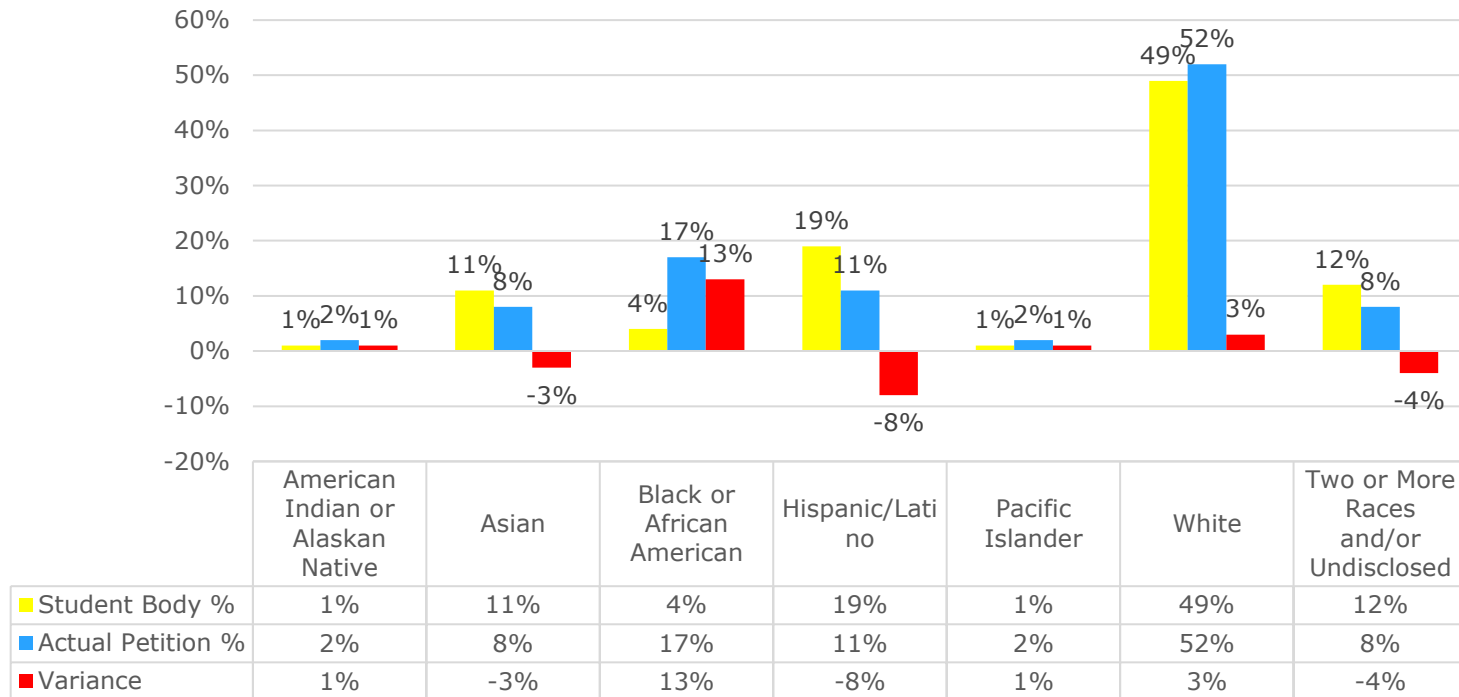
Source: IPEDS database for Portland State University Data at [College Navigator - Portland State University \(ed.gov\)](https://collegenavigator.ed.gov/portland-state-university)

Objective 3 – DEI Benchmarking

Question – How would your institution’s hardship petition approval and/or denial demographic information compare to your institution’s total student body demographics and would this data comparison identify potential barriers that certain groups may experience at your institution?

Objective 3 – DEI Benchmarking

**Student Body by Race
Compared to Approved Petitions by Race**



Note – This is a theoretical example of how demographics could potentially be analyzed.

Objective 4 – Risks

- 1) Academic Dishonesty** – Would your control processes identify a student that is claiming a retroactive withdrawal from a course that they were found guilty of academic dishonesty on?
- 2) International Students** – If you have an international student apply for a hardship/retroactive withdrawal, what are your obligations for SEVIS reporting (i.e. 22 CFR 62.13)
- 3) Student Accounts Sent to Collection Agency** – If you have a student apply for a hardship/retroactive withdrawal, but the student's related account balance has already been sent to collections and/or was collected on, how do you process these situations?

Objective 4 – Risks

- 4) **What Qualifies for a Serious Medical Situation?** What criteria does your organization use for determining what type of medical situations qualify for a petition? For example, do you have a trained medical professional that helps decide these cases or is there set criteria posted of what does and doesn't qualify for a medical petition (i.e. could a simple skin rash qualify).
- 5) **Are all Fees Refunded if Petition Approved?** Does your process refund certain fees where a service was provided? For example, is the student health insurance premium fee refunded if a hardship petition is approved?
- 6) **Student Athletes** – If a student athlete submits a retroactive withdrawal petition, is Athletics notified of the petition? Also, if it is related to a medical situation, then does the petition committee get a copy of the athlete's medical red shirt waiver (if applicable)?

Objective 4 – Risks

- 7) If Petitions that are more than 1 year old are approved, then how does your institutions:**
- a) Verify that prior 1098-T tax forms are accurate?
 - b) Verify that Title IV Financial Aid is refunded via R2T4 (if applicable)?
 - c) Verify that the related annual FISAP report is accurate (if Title IV aid is impacted)?
 - d) If transcripts are altered where a class is removed via the petition process, then how are financial aid repeat course rules and the 150 percent rule for financial aid impacted at your institution?
- 8) State Funding -** If your institution receives funding from your State government that is based on student credit hour production, then how are student credit hours removed via a retroactive withdrawal process “trued up” with your State?

Objective 5 – Control Practices & Resources

- 1) Processing Fee for Petitions** – Many institutions have a petition fee. These fees typically range from \$20 to \$40 and can be refundable. See <https://registrar.oregonstate.edu/late-change-registration> and [Withdrawal - Office of the Registrar \(boisestate.edu\)](#) for examples
- 2) Academic Dishonesty** – Have petitions checked against academic misconduct files. Also, indicate in your policy you don't refund on academic dishonesty cases. See [General Regulations < University of North Alabama \(una.edu\)](#)

Objective 5 – Control Practices & Resources

- 3) Accounts Sent to Collections** – Define in your policy if account balances sent to collections are refundable via a retroactive petition. See [Refunds of Student Tuition/Fees \(nku.edu\)](#) for an example.

Questions?



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- Write a Kick Starter.

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