LEADING STRATEGIES

The Financial Aid Office as an Essential Strategic Partner in SEM

By Rocky Christensen, Cynthia Grunden, and Keri Walters

Strategic enrollment management (SEM) initiatives benefit when SEM committees are inclusive and collaborative. When financial aid professionals are excluded, the risk that certain initiatives will fail increases, especially if those initiatives involve academic changes. Here, the authors explore the reasons financial aid offices and academic affairs, including other college personnel who contribute to academic program development, may struggle to collaborate and identify some of the essential contributions financial aid leaders can make to SEM. Finally, ideas for increased collaboration between academic affairs and financial aid are provided.

Anywhere Community College's (ACC) Strategic Enrollment Management (SEM) committee was thrilled when a local employer approached the dean of manufacturing programs to inquire about offering an existing manufacturing management associate degree program onsite for their employees. One of the SEM committee's goals is to strengthen relationships with local employers to ensure alignment of the curriculum with employer needs, create internship opportunities for students, and increase enrollment by creating onsite programs exactly like this one. The proposed partnership was also very cost effective and relatively easy to operationalize because the site, a learning space owned by the employer, is only five miles from ACC's main campus and ACC already has adjunct faculty qualified to teach the courses. Not wanting to lose this amazing opportunity, the SEM committee encouraged the dean to act quickly to formalize the agreement and begin enrolling students. Admissions and registrar representatives on the SEM committee offered to prioritize the creation of a special application for admission and to batch register admitted students into course sections restricted to this partnership program. The accreditation liaison immediately reached out to the accreditor and the state to approve the new site. The initiative was a great success because students could begin their courses in August, a mere four months after the proposal of the partnership. At the request of ACC's public relations office, a local newspaper wrote a flattering story about the program. Unfortunately, the celebration ended when ACC's director of financial aid read about the partnership in the local paper. The director was not a member of the SEM committee and was unaware that ACC was offering a program at a new site that was not reported to the U.S.

Department of Education (ED). ACC enrolled the participating students in an existing degree program, and there was nothing in the student information system to indicate the new meeting location, so the financial aid office disbursed federal financial aid to these students for more than a year without knowledge of the new location. The director of financial aid was placed in the unfortunate position to inform the president and the provost that ACC was now financially liable for any funds disbursed for students enrolled at the new location. More than 50 percent of the program was being taught at the workplace, and ACC failed to report the new location to ED (Federal Student Aid 2023a).

Although ACC is a fictitious institution, and their mishap may seem extreme, this scenario illustrates a costly finding that has occurred in some federal program reviews. It is critical that financial aid professionals participate in the planning stages of SEM initiatives to avoid compliance-related mishaps. Further, beyond assisting with compliance-related questions, the financial aid office has strategic insights to offer that are often overlooked by institutions that sometimes limit their role in SEM to tactical levels such as executing discounting strategy or participating in recruitment events. Institutions generally recognize the value of including diverse perspectives in SEM planning, but it is challenging to identify key stakeholders when making decisions. Sometimes institutions develop a SEM strategy and supporting tactics without a full understanding of the operational impact, and this risk is heightened when the tactic is related to academic programs that are inextricably linked to an institution's compliance with federal regulations. Many potentially brilliant initiatives have been thwarted by the financial aid office belatedly learning of an institution's plans and being placed in the unfortunate and unfair role of explaining the downsides and risks of the plan. The financial aid office could have planned for and helped successfully mitigate such downsides and risks had they been involved during the planning stages. As the recipient of most notifications from ED, the financial aid office often has early information on key changes to federal financial aid rules and regulations that affect an institution's SEM initiatives. This article discusses some reasons academic affairs and the financial aid office struggle to collaborate, advocates to include the financial aid office on the SEM committee, identifies key areas where early collaboration with financial aid experts is essential, and offers suggestions for increasing collaboration.

Challenges to Collaboration

The opening scenario demonstrates that failing to share information with essential stakeholders can cause egregious mistakes and missed opportunities to advance an institution's SEM goals. This lack of communication and collaboration is especially risky when academic affairs and other college personnel who contribute to academic program development do not collaborate with the financial aid office. Although it is challenging to find an institution that does not espouse the values of communication and collaboration, the reality at many institutions is that departments operate as silos. Talsma (2016) describes the silo mentality as "a mindset present when certain departments or sectors do not wish to share information with others in the same company, " which "reduce[s] efficiency in the overall operation, reduce[s] morale, and may contribute to the demise of a productive company culture" (2).

Silos are not an accidental structure in higher education; rather, they exist by design. The organization of student service functions, such as the financial aid office, into distinct divisions with different chains of command and often separated from the academic departments creates a structural obstacle to collaboration. Further, Friedman (2021) explains that the structure of academic departments encourages them to think of their subject matters as their turf. These organizational structures are useful for the management of a modern institution, and the specialization and segregation of duties are often required by accreditors and regulators. Academic affairs personnel and student services administrators are experts in their respective fields, and institutions benefit from their formal training and practical experiences garnered through their distinct roles. However, this bureaucratic structure requires deliberate efforts to bust through silos to achieve goals.

Typically, academic affairs units develop programs, ensure the quality of the educational product, and maintain the institution's relevance to its students, employers, and the community. Financial aid offices mitigate institutional risk, ensure Title IV (federal financial aid) program eligibility, guide students through the process of paying for college, and develop and support discounting and other SEM strategies. Strained relationships between these two units can be viewed through a historical lens as leaders examine the shift in the meaning of "shared governance" at institutions over the past few decades and a perceived loss of faculty authority, coupled with the rise of increased federal oversight and compliance requirements. The faculty possess the expertise, knowledge, and connection to industry to create innovative offerings that will attract more students. However, the role of faculty on campus has been shifting over the past decade. Faculty report feeling less influence in decision-making (Schuster and Finkelstein 2008), and there is a perceived loss in the level of shared governance, which was exacerbated during the COVID-19 pandemic as many significant institutional decisions were made without faculty involvement (American Association of University Professors 2021). This type of climate can make effective collaboration more difficult because of a lack of trust and the loss of some autonomy in the curricular development process.

An institution's ability to function as good stewards of federal financial aid dollars and ensure compliance with regulations depends on a talented and well-informed financial aid team. Over the past 20 years, federal oversight has increased, and requirements have been added to the list of mandatory tasks with which institutions must comply. In its 2015 report, the Task Force on Federal Regulations[1] recounts an astonishing volume of compliance requirements that would likely surprise any office on campus other than the financial aid office. For example, the task force report recounts that "[i]n 2012 alone, the Department [ED] released approximately 270 'Dear Colleague' letters and other electronic announcements—this means that more than one directive or clarification was issued every working day of the year" (10). This is one of many examples cited in the report, and compliance requirements have continued to grow and evolve since 2012. In fact, the Biden administration published several final rules in 2022 (Lederman 2023) and in 2023 (Knott 2023b) that will substantially affect institutional operations and announced several potentially significant topics for negotiated rulemaking in 2024 that include accreditation requirements, state authorization, the definition of distance education as it pertains to clock hour programs, the Return of Title IV calculation (which applies to withdrawn students who receive Title IV funds), and the disbursement of Title IV funds to students (U.S. Department of Education 2023). Faculty are often not aware of specific compliance-based requirements and how they intersect with academic program development. Within the context of increasing dissatisfaction among faculty, receiving instruction on how to better structure an academic program from the perspective of Title IV compliance can feel like an unwelcome and intrusive directive. It is easy to understand why academic personnel and faculty view financial aid officers as bureaucrats with a limited role in SEM and academic innovation, as they often say "no" and cite complicated and evolving guidance. Financial aid teams often contribute to this perception by speaking in financial aid jargon, treating federal compliance as their turf, and being resistant to innovative academic changes that are likely to create additional work for the financial aid office. Financial aid teams can end up feeling undervalued, misunderstood, and frustrated by a lack of communication and involvement in the academic process. From the financial aid office's perspective, academic affairs can seem exception-driven and out of touch with essential compliance requirements. This often-challenging dynamic becomes fraught when academic affairs has a seat at the table of the SEM committee while the financial aid office is excluded or provided with a limited role.

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[1] A bipartisan group of U.S. senators who, in 2013, enlisted a group of college leaders to draft its *Recalibrating Regulation of Colleges and Universities* report.

Essential Areas of Collaboration

Although the financial aid office typically takes the lead in ensuring federal financial aid compliance, ED considers compliance to be an institutional responsibility. Institutional officials are required to work collaboratively to avoid compliance exceptions, which can be challenging because of the complexity of the rules and the decentralized and siloed nature of many postsecondary institutions. In SEM planning, institutions commonly develop strategies and underlying tactics intended to grow key relationships, redistribute resources to more promising initiatives, and experiment with different ways of offering instruction and academic programs. This section discusses a few examples of common academic strategies and tactics related to SEM planning that benefit from early and frequent collaboration with the financial aid office. These instances highlight the essential role of the financial aid office in ensuring compliance and guiding strategy as it relates to what institutions typically consider academic matters.

Academic Program Offerings

As institutions seek to respond to prospective students' interests and employers' emerging needs, they consider changes to the academic programs they offer. In collaboration with faculty and academic affairs, SEM committees may advocate for adding new programs or ending existing programs that are no longer flourishing. Although academic personnel commonly understand the role of the institution's accreditor in approving new programs and significant changes to existing programs, the financial aid office's role in program management is often less understood. The financial aid office is an essential resource in assessing the financial aid eligibility of new programs, researching program requirements related to financial aid, and understanding regulations that vary by type of program. Every program offered by an institution and approved by its accreditor is not automatically eligible for financial aid. Although in some cases an institution may make a self-determination of the federal financial aid eligibility of a program at the same credential level as its currently approved programs, in other cases the institution must notify ED or even wait for ED's approval prior to disbursing Title IV funds (Federal Student Aid 2023a). The financial aid office can confirm if an institution can make a self-determination of federal financial aid eligibility or if additional actions are required prior to enrolling students in the program with the expectation of financial aid eligibility.

In most cases, if a non-profit institution offers a program that does not lead to a degree (commonly called a certificate program) it is considered a gainful employment program and must be reported to ED by the institution within ten days of receiving final approval from its accreditor and other oversight bodies. Almost all degree and certificate programs offered by proprietary institutions are gainful employment programs (Federal Student Aid 2023b). Under the current rules, to be considered a federal financial aid eligible program, a gainful employment program must prepare students for training in a recognized occupation and demonstrate a reasonable relationship between the entry-level requirements for the occupation and the length of the program (2023b). Financial aid and academic administrators who have been working in higher education for more than a decade will likely recall the tumultuous history of requiring gainful employment programs to achieve certain student debt-to-earnings ratios to retain federal student aid eligibility prior to the rules being fully repealed in 2020 (Kreighbaum 2019). On October 10, 2023, the most recent iteration of the gainful employment rule was published in the Federal Register with an effective date of July 1, 2024 (Office of Postsecondary Education 2023). Under the new rule, institutions and SEM committees need to consider how gainful employment programs will perform under the more rigorous metrics, provide student and program-level data to ED for all programs (including non-gainful employment programs), and in some cases provide additional consumer information regarding program outcomes to prospective and current students. The financial aid office will serve an essential and strategic role in advising SEM committees and academic affairs on the new requirements, monitoring program eligibility, and ensuring institutional compliance.

Changes to Instructional Modality

In consultation with academic affairs, SEM committees may determine that new or increased online offerings present an opportunity to grow enrollment and retain students who appreciate the convenience of distance learning. Although this type of academic decision may seem unrelated to the administration of federal financial aid, the financial aid office is an essential strategic partner in planning and implementing certain types of changes to instructional modalities.

During the COVID-19 pandemic, institutions explored new teaching and learning modalities, including offering courses in a hybrid model as well as entirely online. Because of their success and popularity with students and faculty, many colleges are now considering making these modality changes permanent (Ubell 2022; Villasenor 2022). As institutions continue to experiment with new instructional modalities, they must be cognizant of recent significant guidance from ED on distance education and institutional Title IV eligibility. Failing to implement this guidance can cause considerable financial liabilities and program ineligibility. The distance education and innovation final rule published to the *Federal Register* on September 2, 2020, introduced several key changes to distance education requirements that became effective on July 1, 2021. The most significant changes include formally defining activities that qualify as "academic engagement," requiring that institutions provide "regular and substantive interaction" between the instructor and the student in distance education courses on a "predictable and scheduled basis" (including in asynchronous courses), requiring active monitoring of student engagement in distance education courses measured in clock hours, and ensuring that each scheduled week of instruction in asynchronous distance education includes an activity that qualifies as academic engagement (Office of Postsecondary Education 2020). Additionally, on January 19, 2021 ED published an electronic announcement describing updated guidance regarding accreditation requirements for distance education to require that "before an institution offers *any* distance education programs that can be eligible for Title IV, the institution must be evaluated and accredited for its effective delivery of distance education programs by a recognized agency that has distance education in its scope of recognition" (Office of Postsecondary Education 2021). Further, ED recently promulgated guidance requiring that institutions report online program managers (OPM) as third-party servicers and have signaled that they plan to consider changes to incentive compensation guidance as it relates to OPMs (Knott 2023a). At the time of the drafting of this article, implementation of the guidance regarding third-party servicers has been delayed to early 2024 as ED considers stakeholders' feedback (Kvaal 2023; U.S. Department of Education 2023). However, it is likely that the final version of the guidance will address OPMs. Although the financial aid office would not be the responsible department for implementing this quickly evolving guidance regarding distance education, they are the party most likely to be aware of it as ED primarily promulgates such information through FSA Partner Connect, a website used daily by financial aid professionals. If the financial aid office is included in conversations on instructional modality and asked to monitor relevant guidance, institutions can proactively ensure compliance and SEM committees will be well informed and prepared to incorporate this guidance into their plans.

Teaching and Learning Locations

A relatively common SEM strategy is to open a new teaching and learning location. Institutions choose to do this for many reasons such as population and demographic changes and to strengthen the relationship between the institution and key workforce partners by delivering academic programs to employees at their workplace. As discussed in the opening scenario in this article, when planning to open a new location, academic personnel and the SEM committee may be unaware of the Title IV implications. It is essential to discuss any potentially new locations with the financial aid office prior to executing an agreement or spending any resources as an institution's federal financial aid eligibility does not automatically extend to new locations. The financial aid office will know if any restrictions related to adding new locations apply. Once the institution has obtained accreditor approval and legal authorization from the state where the new location is physically located, the financial aid office can report the new location to ED as required. For the same reasons, the financial aid office needs to be notified in advance if an existing location that previously did not offer 50 percent or more of an eligible program will be increasing to 50 percent or greater (Federal Student Aid 2023a). Failure to include the financial aid office in these discussions prior to marketing to or enrolling students with the expectation of federal financial aid eligibility could cause serious financial liabilities for the institution.

Conversely, a SEM committee may advocate for closing an under-enrolled location to free up funds and faculty to be redeployed to potentially more beneficial locations, programs, or initiatives. Whereas an institution does not need approval from ED to close a location, ED must be notified of the decision, and the institution may be determined financially liable for any closed school loan discharges approved for students by ED. On November 1, 2022, ED published new rules pertaining to closed school loan discharges that became effective July 1, 2023 (Office of Postsecondary Education 2022) and should be reviewed by any institution planning to close a location. When discussing the possibility of closing a location, the financial aid office should be consulted so that they can provide an estimate of any potential closed school discharges and assist in developing a strategy to minimize potential costs to the institution. With the financial aid office's perspective and expertise, an institution may conclude that it is most advantageous to teach out all enrolled students at a location prior to closing it.

The above topics are only intended as examples of the importance of including the financial aid office in potential academic and SEM initiatives and is not an all-inclusive list. As Schultheis (2014) explains, "Financial Aid Directors must possess an extraordinarily detailed and broad knowledge base related to regulations associated not only with disbursement of funds through their offices but also with percentages of instruction offered through different modalities or at different locations which can affect their ability to apply aid and require additional Cleary *[sic]* Act reporting" (14). Clearly, this broad base of knowledge is an invaluable institutional asset that SEM committees should utilize.

Increasing Collaboration

This article advocates for including the financial aid office on the SEM committee by providing several examples of how their inclusion adds value and mitigates risk. However, merely including the financial aid office in these conversations will not magically repair any existing rift or lack of collaboration between the financial aid office and academic affairs. Also, the financial aid office may be openly resistant to participating and feel that SEM planning is a distraction from their core responsibilities. As previously discussed, the silo structure of higher education organizations does not lead to collaboration and communication without intentional efforts to foster inclusion. "Silo busting" requires potential partners to understand and appreciate each other's strengths and contributions and deliberately break out of individualized and departmentalized behaviors (de Waal, Weaver, Day and van der Heijden 2019; Gulati 2007; Kovvali 2022; Roper 2021).

This article concludes by outlining some ideas for increasing collaboration between academic affairs and other college personnel who contribute to academic program development and financial aid units. The authors derived these interventions from their professional experience and made tangible strides toward more informed decision-making and successful SEM outcomes.

- **Start by starting.** As discussed further below, a simple first step toward effective collaboration is examining the structure of SEM committees and ensuring representation from key departments, including the financial aid office. If a strong collaborative partnership between academic affairs and financial aid is not yet part of the campus culture, remember that large-scale changes do not need to be made all at once. It is normal to encounter some resistance when attempting to add a layer of feedback to the curriculum development process or requiring faculty and academic administrators to take part in a presentation on compliance-based training and development. Also, as discussed above, the financial aid team may view participation as a burdensome additional task rather than as an opportunity to connect with academic personnel and contribute to the institution's SEM goals. Instead of feeling discouraged, try collaborating first with those entities who are open to it and interested in participating. Starting small can make a powerful impact, especially when combined with efforts to publicize the results of these initiatives. In their book that explores small steps that institutions can take to improve, Light and Jegla (2022) recommend recognizing effort as much as success because "the entire effort conveys that the university promotes an innovative culture that permeates the campus from administration to students" (27). SEM committees are focused on achieving goals for the future health of the university, and promoting a culture that values innovation is key to achieving those goals.

- **Be intentional.** Collaboration between groups that otherwise rarely come together is unlikely to happen organically. Consider the culture on campus and survey opportunities to set up intentional spaces, events, or communications that will foster the growth of these relationships and the formal or informal sharing of information. For example, are there formal structured events where these groups could gather to give presentations on financial aid initiatives (discounting strategies, new or upcoming federal compliance requirements) and academic initiatives (upcoming academic program proposals, new academic calendars, or scheduling models)? These could include college, departmental, or faculty retreats, regular department chair meetings, or university-wide assemblies. If no appropriate structures exist, develop one for this purpose and ensure these conversations are taking place in SEM committee meetings.
- **Examine the makeup of the campus SEM committee structure.** Commonly, SEM committees include senior members from academic affairs, enrollment management, admissions, and institutional research. As illustrated in this article, it is also essential to include a knowledgeable representative from the financial aid office on the committee. When financial aid professionals participate in SEM planning from the beginning, potentially costly mistakes can be avoided before they even happen, and fresh ideas will be brought to the table through a different and valuable lens. Hossler and Bontrager (2014) provide a foundational approach any college might consider when building their SEM stakeholder groups, which includes the creation of several key categories of stakeholders throughout the process. Their foundational model includes all the following key stakeholder groups: executive team, SEM steering committee, recruitment council, three to four recruitment council subcommittees, retention council, three to four retention council subcommittees, and a data team (Hossler and Bontrager 2014). This suggested model should be adjusted to best fit the needs and size of the institution. Further, Schultheis (2014) provides a rationale to expand the SEM committees to include not only the director of financial aid, but also personnel from the financial aid office who are most directly connected to students as they will have valuable insights to share regarding students' personal situations and experiences.
- **Review the curriculum development process.** Consider the curriculum development process for new academic programs and changes to existing programs, and review who participates in the feedback and approval process. Often, the faculty will initiate new program proposals or changes, and these will flow through the academic affairs' hierarchical structures. Typically included in this workflow are the department chair, curriculum committees, faculty senate, deans and provost, or chief academic officer before moving on to the registrar for implementation. Strategically inserting a stakeholder feedback group early in this workflow is an excellent way to involve not only financial aid units but also enrollment management/admissions, academic advising, and other groups with a specific lens through which useful observations can be invited and shared. New stakeholders will require an intro-

duction to the curriculum development process to understand that their role is not to approve or deny programs but rather to advise on how academic programs interact with other areas of the college (such as financial aid requirements) so that the new or updated program can be smoothly implemented once all feedback is considered and all levels of approval are achieved. Involving a stakeholder group will help to ensure that any pitfalls concerning the structure of the program are brought to light early in the process and can be addressed before moving the proposal forward. This not only improves the proposal but also helps to prevent resentful feelings that can arise when proposals are halted toward the end of the curricular process.

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