

CAS Self-Assessment Guide

FINANCIAL AID PROGRAMS 2015



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FINANCIAL AID PROGRAMS CAS Contextual Statement

According to National Association of Student Financial Aid Administrator's (NASFAA) *2014 National Student Aid Profile: Overview of 2014 Federal Programs*, more and more Americans have relied on federal student financial assistance programs to assist with college costs. The number of students applying for federal financial assistance rose from 19.4 million in 2007-08 to nearly 31.4 million in 2011-12, a 62 percent increase over five years. Among the multitude of student financial aid sources, the U.S. Federal government provided the majority of student aid, 71 percent (or \$238.5 billion dollars), in 2012-13. The Pell Grant program, which provides grants to low-income undergraduates with the greatest demonstrated financial need, provided approximately \$35 billion to approximately 9.4 million undergraduate students in 2011-12. *Trends in Student Aid 2014*, from The College Board, also indicated in 2013-14, 58 percent of U.S. federal education loans accounted for all federal student aid and 43 percent of aid from all sources— \$62,925 million. Along with federal student aid, other sources of aid were state governments; college and universities; private scholarships and employer programs; and other nonfederal agencies, such as state-or institution-sponsored and private-education loans. The mission of the financial aid office focuses on service to students and stewardship of funds. Practically speaking, the financial aid office assumes primary responsibility on behalf of the institution for compliance with government requirements for financial aid distribution.

An effective and comprehensive aid program must be supported by leaders at the institution who understand the increasing administrative and operational responsibilities, obligations, and the potential liabilities that accompany participation in federal aid programs. It also requires that leaders be aware of the challenges and conflicts imposed on the administration of aid and the delivery of quality services to their students. Leaders can take several steps to ensure that the financial aid program advances the goals of the institution without compromising service quality or program integrity. The consistency between institutional goals and those of the aid program can be evaluated by examining the level of commitment of internal resources, the composition of aid packages, the levels of unmet need, and the extent of commitment to need-based aid.

The establishment and support of goals and measures that ensure high-quality financial aid operations should be a high priority for all institutions. Of equal importance is the institution's responsibility for educating the community about its goals and mission and the role of financial aid in defining and meeting them. Communicating the importance of financial aid to both internal and external constituencies is critical. Presidents, trustees, and others must understand and support the policies of their financial aid programs and serve as effective advocates at the institutional and governmental levels. These advocacy efforts should

- provide opportunities for representatives from all academic and administrative areas of the institution to discuss and help formulate institutional goals;
- coordinate with the financial aid office to develop mission statements and strategic goals that consider its relationship with other offices;
- present the philosophy, purpose, goals and strategies, and the principle governing financial aid awards and disseminate these statements to demonstrate the leadership's support of them and their complementary relationship to broader objectives of the institution;
- provide forums to make known the impact of pending federal and state developments on the institution and the financial aid office; and
- communicate widely the criteria by which financial aid policies are defined and evaluated and create opportunities to highlight program successes and the positive impact they have on students and the broader community.

Institutions committed to these strategies draw upon tools provided by the government, the National Association of Student Financial Aid Administrators (NASFAA), and other non-governmental entities. When institutions



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NASFAA Statement of Ethical Principles, they should defer to the NASFAA Statement of Ethical Principles and Code of Conduct for guidance.

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Council for the Advancement of Standards in Higher Educations

INTRODUCTION AND INSTRUCTIONS

CAS Self-Assessment Guide

The *Self-Assessment Guides* (SAG) translate functional area CAS standards and guidelines into tools for conducting self-study. Educators can use this SAG to gain informed perspectives on the strengths and deficiencies of their programs and services as well as to plan for improvements. Grounded in the reflective, self-regulation approach to quality assurance in higher education endorsed by CAS, this SAG provides institutional, divisional, departmental, and unit leaders with a tool to assess programs and services using currently accepted standards of practice.

The *Introduction* outlines the self-assessment process, describes how to complete a programmatic self-study, and is organized into three sections:

- I. Self-Assessment Guide Organization and Process
- II. Rating Examples
- III. Formulating an Action Plan, Preparing a Report, and Closing the Loop

The introduction is followed by the *Self-Assessment Worksheet*, which presents the CAS standards for the functional area and incorporates a series of criterion measures for rating purposes.

I. Self-Assessment Guide and Process

CAS developed and has incorporated a number of common criteria that have relevance for each and every functional area, no matter what its primary focus. These common criteria are referred to as "General Standards," which form the core of all functional area standards. CAS standards and guidelines are organized into 12 components, and the SAG workbook corresponds with the same sections:

- Part1.MissionPart7.Part2.ProgramPart8.Part3.Organization and LeadershipPart9.Part4.Human ResourcesPart10.Part5.EthicsPart11.Part6.Law, Policy, and GovernancePart12.
- Part 7. Diversity, Equity, and Access
 - 8. Internal and External Relations
 - Part 9. Financial Resources
 - Part 10. Technology
 - Part 11. Facilities and Equipment
 - Part 12. Assessment

For each set of standards and guidelines, CAS provides a Self-Assessment Guide (SAG) that includes a recommended comprehensive self-study process for program evaluation. Seven basic steps to using a SAG are suggested for implementing a functional area self-study. The following self-study process is recommended.

1. Plan the Process Map out steps for process, develop timeline, build buy-in with all stakeholders, and explicitly identify desired outcomes of the self-study	5. Develop an Action Plan Identify discrepancies, corrective action, and recommended steps (e.g., identify strengths, weaknesses, recommendations, benchmarks for achievement, resources, timeframe, and responsible individuals)
2. Assemble and Educate the Self-Assessment Team Determine who should be on the team and how to educate the team about the self-study process	6. Prepare a Report Identify audience for report(s); describe the self-study process, evidence gathering, rating process, and evaluations; summarize strengths and weaknesses; describe the action plan; and draft an executive summary
3. Identify, Collect, and Review Evidence Define what constitutes evidence; then gather, collect,	7. Close the Loop Put action plans into practice; work to navigate politics and

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manage, and review evidence	secure resources; identify barriers to overcome; and build
	buy-in to the program review results
4. Conduct and Interpret Ratings Using Evaluative	
Evidence	
Clarify team's rating criteria; employ a process for rating	
[small group, individual, staff]; negotiate rating differences;	
and manage group ratings	

The first four steps in conducting self-assessment will lead you through planning your process, preparing your team, gathering evidence, and assigning ratings to the criterion measures.

- A. Plan the self-study process
- B. Assemble and educate self-study team(s)
- C. Identify, collect, and review documentary evidence
- D. Conduct ratings using evaluative evidence

Step A: Plan the Self-Study Process

Prior to beginning a program review, division and functional area leaders need to determine the area (or areas) to be evaluated and the reasons for the project. This may be dictated by institutional program review cycles or planning for accreditation processes, or it may result from internal divisional goals and needs. Explicitly identifying desired outcomes and key audiences for a self-study will help leaders facilitate a process that makes the most sense for the project.

Critical first phases of a program review include mapping out the planned steps for a program review and developing timelines. Leaders will also want to build buy-in with stakeholders of the functional area. In the initial planning stage of the self-study process it is desirable to involve the full functional area staff, including support staff members, knowledgeable students, and faculty members when feasible. This approach provides opportunity for shared ownership in the evaluation.

Step B: Assemble and Educate the Self-Assessment Review Team

The second step is to identify an individual to coordinate the self-assessment process. CAS recommends that the coordinator be someone other than the leader of the unit under review; this facilitates honest critique by the review team and enhances credibility of the final report. Once a leader is designated, members of the institutional community [e.g., professional staff members, faculty members, students] need to be identified and invited to participate. Whether a sole functional area or a full division is to be reviewed, the self-study team will be strengthened by the inclusion of members from outside the area(s) undergoing review.

In preparing the team for the self-study, it is imperative to train the team on the CAS standards, as well as selfassessment concepts and principles. CAS standards and guidelines are formulated by representatives of 41 higher education professional associations concerned with student learning and development. The CAS standards represent essential practices; the CAS guidelines, on the other hand, are suggestions for practice and serve to elaborate and amplify standards through the use of suggestions, descriptions, and examples. Guidelines can often be employed to enhance program practice. Following a long-standing CAS precedent, the functional area standards and guidelines presented as an appendix to the self-assessment instrument—are formatted so that standards (i.e., essentials of quality practice) are printed in bold type. Guidelines, which complement the standards, are printed in light-face type. Standards use the auxiliary verbs "must" and "shall" while guidelines use "should" and "may."

In this self-assessment instrument, the CAS standards have been translated into criterion measures and grouped into subcategories for rating purposes. The criterion measures are not designed to focus on discrete ideas; rather, the



measures are designed to capture the major ideas and elements reflected in the standards. For each of the 12 component parts, team members will rate clusters of criterion measures. If the assessment team decides to incorporate one or more of the guidelines into the review process, each guideline can be similarly translated into a measurable statement to facilitate rating.

As a group, the review team should examine the standards carefully and read through the entire self-assessment guide before beginning to assign ratings. It may be desirable for the team, in collaboration with the full staff, to discuss the meaning of each standard. Through this method, differing interpretations can be examined and agreement generally reached about how the standard will be interpreted for purposes of the self-assessment.

Step C: Identify, Collect, and Review Documentary Evidence

Collecting and documenting evidence of program effectiveness is an important step in the assessment process. No self-assessment is complete without relevant data and related documentation being used. It is good practice for programs to collect and file relevant data routinely, which can then be used to document program effectiveness over time. Available documentation should be assembled by the unit under review and provided to the review team at the outset of the study. The team may request additional information as needed as the review is conducted.

Documentary evidence often used to support evaluative judgments includes:

- Student Recruitment and Marketing Materials: brochures and other sources of information about the program, participation policies and procedures, and reports about program results and participant evaluations
- *Program Documents:* mission statements, catalogs, brochures and other related materials, staff and student manuals, policy and procedure statements, evaluation and periodic reports, contracts, and staff memos
- Institutional Administrative Documents: statements about program purpose and philosophy relative to other educational programs, organizational charts, financial resource statements, student and staff profiles, and assessment reports
- *Research, Assessment, and Evaluation Data*: needs assessments, follow-up studies, program evaluations, outcome measures and methodologies, and previous self-study reports
- *Staff Activity Reports*: annual reports; staff member vitae; service to departments, colleges, university, and other agencies; evidence of effectiveness; scholarship activities, and contributions to the profession
- *Student Activity Reports*: developmental transcripts, portfolios, and other evidence of student contributions to the institution, community, and professional organizations; reports of special student accomplishments; and employer reports on student employment experiences

In the SAG, each section provides recommended evidence and documentation that should be collected and compiled prior to conducting ratings. The evidence collected is likely applicable across numerous sections.

Raters can best make judgments about the program expectations articulated in the standards when they have a variety of evidence available. Multiple forms of evidence should be reviewed and reported in the narrative section of the SAG worksheets. Through the rating process, a self-study team may identify a need to obtain additional information or documentation before proceeding, in order to lend substance to judgments about a given assessment criterion. Evidence and documentation should be appended and referenced in the final self-assessment report.



Step D: Conduct and Interpret Ratings Using Evaluative Evidence

When the program review team has gathered and reviewed necessary evidence, they will be able to assign and interpret ratings to individual criterion measures, following three steps.

- 1) Rate Criterion Measures
 - a) Team members individually rate criterion measures based on their understanding of the evidence.
 - b) Team discusses and assigns collective ratings for criterion measures.
- 2) Provide Narrative Rationale
 - a) Document the reasoning and evidence for the rating assigned to each subsection, in the space provided for *Rationale*.
 - b) Explain what evidence has been collected and reviewed to support individual and/or team ratings and judgments.
 - c) Provide information for follow-up and relevant details about ratings (e.g., if *Partly Meets* is assigned as a rating, what aspects of the program or service do and do not meet which standards statements).
- 3) Answer Overview Questions (In the Instrument)
 - a) Respond, in writing in the space provided, to the *Overview Questions* that immediately follow the rating section of each of the 12 components.
 - b) Use answers to the *Overview Questions*, which are designed to stimulate summary thinking about overarching issues, to facilitate interpretation of the ratings and development of the self-study report.

Assessment criterion measures are used to judge how well areas under review meet CAS standards. These criterion measures are designed to be evaluated using a 4-point rating scale. In addition to the numerical rating options, *Does Not Apply* (DNA) and *Insufficient Evidence/Unable to Rate* (IE) ratings are provided. This rating scale is designed to estimate broadly the extent to which a given practice has been performed.

CAS CRITERION MEASURE RATING SCALE

DNA	IE	0	1	2	3
Does Not	Insufficient Evidence/	Does Not	Partly Meets	Meets	Exceeds
Apply	Unable to Rate	Meet			

Under rare circumstances, it may be determined that a criterion measure used to judge the standard is not applicable for the particular program (e.g., a single sex or other unique institution that cannot meet a criterion measure for that reason). In such instances, raters may use a DNA rating and, in the self-study report, describe their rationale for excluding the practice in the criterion measure. The IE response can be used when relevant data are unavailable to support a judgment. When either the DNA or the IE ratings are used, an explanatory note should be provided in the report. Items rated with 0 should generate careful group consideration and appropriate follow-up action.

Program leaders may wish to incorporate additional criterion measures, such as selected CAS guidelines or other rating scales, into the procedures before the self-assessment process begins. Such practice is encouraged, and the SAG instrument can be amended to incorporate additional criterion measures for judging the program. In such instances, additional pages to accommodate the additional criterion measures may be required.



Whatever procedures are used to arrive at judgments, deliberate discussions should occur about how to initiate the rating process and select the optimal rating strategy. In such discussions, it is expected that disagreements among team members will occur and that resulting clarifications will inform all participants. It is important that the team achieve consensual resolution of such differences before proceeding with individual ratings.

CAS suggests a two-tiered (individual and group) judgment approach for determining the extent to which the program meets the CAS standard. First, the self-assessment team members (and functional area staff members, if desired) individually should rate the clusters of criterion measures using separate copies of the CAS Self-Assessment Guide. In addition, they will need to document their reasoning and evidence for the rating assigned to each subsection in the space provided for *Rationale*. This individualized rating procedure is then followed by a collective review and analysis of the individual ratings.

The individual ratings should be reviewed, discussed, and translated into a collective rating by the team; then the team is ready to move to the interpretation phase of the self-assessment. Interpretation typically incorporates discussion among team members to assure that all aspects of the program were given fair and impartial consideration prior to a final collective judgment. At this point, persistent disagreements over performance ratings may call for additional data collection.

After the team review is completed, a meeting with relevant administrators, staff members, and student leaders should be scheduled for a general review of the self-assessment results. The next step, including discussion of alternative approaches that might be used to strengthen and enhance the program, is to generate steps and activities to be incorporated into an action plan. This step is best done by the unit staff, informed by the results of the review and, when feasible, in consultation with the review team. The Work Forms will guide this process.



II. Rating Examples

Rating Standard Criterion Measures

All CAS standards, printed in bold type, are viewed as being essential to a sound and relevant program or service that contributes to student learning and development. Many of the statements contained in CAS standards incorporate multiple criteria that have been grouped for rating purposes. Consequently, raters may need to judge several standards statements through a single criterion measure. Using the "Ethics" standards as an example, the following illustrates how criterion measures are grouped into subcategories for rating.

Part 5. ETHICS

Suggested Evidence and Documentation:

- 1. Program code or statement of ethics
- 2. Ethics statements from relevant functional area professional associations
- 3. Personnel policies, procedures and/or handbook
- 4. Student code of conduct
- Operating policies and procedures related to human subjects research (Institutional Review Board, IRB)
- 6. Minutes from meetings during which staff reviewed and discussed ethics

Criterion Measures:

DNA	IE	0	1	2	3
Does Not Apply	Insufficient Evidence/ Unable to Rate	Does Not Meet	Partly Meets	Meets	Exceeds
5.1 Eth	ical Standards			-1.1100100-0001100000000000000000000000	
•	Programs and services revie develop and implement app				d adopt or
•	Programs and services publi periodic review, and orient prelated institutional policies	new personnel			
Rationale:					
5.2 Stat	ement of Ethical Standards				
•	Statements of ethical standa privacy and maintain confid				

Using Guidelines to Make Judgments about the Program

As discussed above, program leaders may wish to include selected *CAS Guidelines* to be rated along with the standards. To accomplish this, criterion measure statements must be written for the guidelines selected. The self-study team can readily create statements to be judged as part of the rating process. Programs generally considered in compliance with the standards especially can benefit by using guidelines because guidelines typically call for enhanced program quality.

Not all programs under review will incorporate guidelines to be rated as part of their self-studies. Even though the guidelines are optional for rating purposes, raters are strongly encouraged to read and review them as part of the training process. When *CAS Guidelines* or other criterion measures are rated, they should be treated as if they were standards.



III. Formulating an Action Plan, Preparing a Report, and Closing the Loop

The final three steps in the self-assessment process help a review team and unit plan for and take action using the information garnered through the review of documentary evidence and rating process.

Step E: Formulating an Action Plan

Typically, the assessment process will identify areas where the program is not in compliance with the standards. Action planning designed to overcome program shortcomings and provide program enhancements must then occur. Following is an outline of recommended steps for establishing a comprehensive plan of action using the CAS self-assessment work forms. Space is provided in the SAG for recording relevant information.

- 1) Resolve Rating Discrepancies (Work Form A)
 - a) Identify criterion statements for which there is a substantial rating discrepancy.
 - b) Discuss these items and come to a resolution or final decision. Note any measures where consensus could not be reached.
- 2) Identify Areas of Program Strength (Work Form B)
 - a) Identify criterion measure ratings where *strength* in performance or accomplishment was noted (i.e., program exceeds criterion with a rating of 4).
- 3) Identify Areas for Improvement (Work Form B)
 - a) Identify criterion measures where program weaknesses (i.e., program shortcomings that fail to meet criterion measures, and received a rating of 0 or 1) were noted.
- 4) Recommend Areas for Unit Action (Work Form C)
 - a) Note items that need follow-up action for improvement and indicate what requires action.
 - b) This is the last form to be completed by the review team.
- 5) Prepare the Action Plan (Work Form D)
 - a) This step should be completed by the unit being reviewed.
 - b) Use the items requiring attention listed in Work Form C to formulate a brief action plan. The focus and intended outcomes of the next steps to be taken should be identified.
- 6) Write Program Action Plan (Work Form E)
 - a) List each specific action identified in the self-study that would enhance and strengthen services.
 - b) Determine the actions needed to improve for each practice.
 - c) Identify responsible parties to complete the action steps.
 - d) Set dates by which specific actions are to be completed.
- 7) Prepare Report
 - a) Prepare a comprehensive action plan for implementing program changes.
 - b) Identify resources (i.e., human, fiscal, physical) that are essential to program enhancement.
 - c) Set tentative start-up date for initiating a subsequent self-study.

Step F: Preparing a Report

To complete the process, a summary document should be produced that (a) explains the mission, purpose, and philosophy of the program; (b) reviews the outcome of the assessment; and (c) recommends specific plans for action.



In addition, depending on the report's audience, describe the process, evidence gathering, ratings, and evaluations, and summarize strengths and weaknesses.

Step G: Closing the Loop

Finally, to close the loop on a program's self-study process, functional area staff members must implement the recommended changes to enhance the quality of their program. In this final step, the staff endeavors to put action plans into practice. In some cases, there will be institutional politics to be navigated; continued support from functional area leaders remains essential. Staff members will want to work collectively to secure resources, identify barriers to implementation, and build stakeholder buy-in to the results. CAS recommends that closing the loop on a self-study process be integrated into regular staff meetings, individual supervision, trainings, and annual reports. A key to successfully using program review in post-secondary student services is weaving the entire process, from planning through taking action, into the fabric of the functional area, departmental, and divisional culture.



FINANCIAL AID PROGRAMS

CAS Self-Assessment Guide

Part 1: MISSION

Suggested Evidence and Documentation:

- 1. Current mission statement, brief description of how it was developed, and date of last review
- 2. Additional goals, values, and statements of purpose
- 3. Description and copies (if applicable) of where mission statement is disseminated (e.g., included in operating and personnel policies, procedures and/or handbook, hanging in office common space, on website, in strategic plan, and other promotional materials)
- 4. Institutional/divisional mission statements (e.g., map program mission to broader mission statements)
- 5. Any additional professional standards aligned with program/service (e.g., standards promoted by functional area organizations)
- 6. Institutional demographics, description of student population served, and information about community setting

Criterion Measures:

DNA	IE	0	1	2	3
Does Not Apply	Insufficient Evidence/	Does Not Meet	Partly Meets	Meets	Exceeds
	Unable to Rate				

- 1.1 Program Mission and Goals
 - The mission of Financial Aid Programs (FAP) is to develop, review, and disseminate financial resources and information to students to assist them in achieving their educational goals from preenrollment through graduation.
 - FAP goals are consistent with the mission, goals, policies, procedures, and characteristics of the institution and compatible with the ability of the institution to provide adequate resources to meet the needs and educational goals of students.
 - Institutional goals for financial aid are developed and reviewed regularly. Goals comply with laws, regulations, policies, and other providers of funding.
 - Goals are consistent with statements of good practices articulated by relevant and appropriate professional associations such as the National Association of Student Financial Aid Administrators and the Canadian Association of Student Financial Aid Administrators.

Rationale:

1.2 Mission Implementation and Review

FAP develops, disseminates, implements, and regularly reviews its mission.

Rationale:



- 1.3 Mission Statement
 - The mission statement is consistent with that of the institution and with professional standards; is appropriate for student populations and community settings; and references learning and development.

Rationale:



Overview Questions:

- 1. How does the mission embrace student learning and development?
- 2. In what ways does FAP mission complement the mission of the institution?
- 3. To what extent is the mission used to guide practice?

Part 2: PROGRAM

Suggested Evidence and Documentation:

- 1. Program student learning and development outcomes, and brief description of how they were developed
- 2. List of current collaborations across the institution that facilitate student learning and development
- 3. Map of program activities and ways they connect to student learning and development outcomes
- 4. Map or report of outcome assessment activities, including results
- 5. Strategic plans program design and enhancement
- 6. Specifications or requirements (if applicable)

Criterion Measures:

DNA	IE	0	1	2	3
Does Not Apply	Insufficient Evidence/	Does Not Meet	Partly Meets	Meets	Exceeds
	Unable to Rate				

2.1 Program Contribution to Student Learning and Development

- Financial Aid Programs (FAP) contributes to students' formal education (the curriculum and cocurriculum), learning, and development.
- FAP contributes to students' progression toward and timely completion of educational goals and preparation for their careers, citizenship, and lives.
- FAP identifies relevant and desirable student learning and development outcomes that align with the CAS Learning and Development Outcomes and related domains and dimensions.

Rationale:

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- 2.2 Assessment of Learning and Development
 - FAP engages in outcomes assessment, documents evidence of its impact, and articulates the role it plays in student learning and success.
 - FAP uses evidence to create strategies for improvement of programs.

Rationale:



2.3 Program Design

- FAP bases its work on intentional student learning and development outcomes.
- FAP reflects developmental and demographic profiles of the student population and responds to needs of individuals, populations with distinct needs, and relevant constituencies.
- FAP is delivered using multiple formats, strategies, and contexts and is designed to provide universal access.

Rationale:



2.4 Collaboration

• FAP collaborates with others across the institution in ways that benefit students.

Rationale:

2.5 Address Barriers to Student Achievement

- FAP assists students by addressing financial issues that may serve as barriers to enrollment and the achievement of educational goals, including students in transition, financial aid practices, and financial Counseling.
- Financial aid administrators track student financial aid histories and the impact of past aid on receiving aid in the future.
- Practices establish, promulgate, and implement financial aid criteria that accurately represent the financial needs of the applicant pool, set priorities within the applicant group, and respond with funding to the extent possible.
- Financial counseling provides services to students for (a) the purpose of providing better understanding of financial aid, (b) financial guidance, (c) individual review of situations that may require special consideration, (d) guidance in academic and financial matters especially as they relate to satisfactory academic progress, and (e) guidance on default management, budgeting, and loan repayment.

Rationale:

2.6 Financial Aid Education and Distribution

- FAP promotes and maintains integrity, accuracy, and timeliness in the delivery of financial aid.
- FAP provides comprehensive information and clear policies and procedures for students and their parents/guardians and families to make informed decisions regarding the financing of their education.
- FAP clarifies the types of financial assistance to the student.
- Print and online communication includes financial aid deadlines and information on opportunities for financial aid.

Rationale:

Overview Questions:

- 1. What are the most significant student learning and development outcomes of FAP?
- 2. What difference does FAP make for students who engage with it?
- 3. What is the demonstrated impact of FAP on student learning, development, and success?
- 4. How has collaboration in program development and delivery affected its impact or outcomes?
- 5. What changes or adjustments have been made as a result of assessment activities?

Part 3: ORGANIZATION AND LEADERSHIP

Suggested Evidence and Documentation:

- 1. Program goals and outcomes
- 2. Operating policies, procedures and/or handbook
- 3. Personnel and student handbook(s), policies and procedures, and organizational chart(s)
- 4. Personnel position descriptions, expectations, and performance review templates



- 5. Periodic reports, contracts, and personnel memos
- 6. Annual reports by program leaders
- 7. Program leader resumes, including additional professional involvement
- 8. Strategic and operating plans
- 9. Needs assessment of program constituents
- 10. Report of professional development activities

Criterion Measures:

DNA	IE	0	1	2	3
Does Not Apply	Insufficient Evidence/	Does Not Meet	Partly Meets	Meets	Exceeds
	Unable to Rate				

3.1 Organization Documents

• Financial Aid Programs (FAP) has clearly stated and current goals and outcomes, policies and procedures, descriptions of personnel responsibilities and expectations, and clear organizational charts.

Rationale:



3.2 Actions of Leaders

- Leaders model ethical behavior and institutional citizenship.
- Leaders with organizational authority provide strategic planning, management and supervision, and program advancement.

Rationale:



3.3 Strategic Planning

- FAP leaders articulate a vision and mission, as well as set goals and objectives based on the needs of populations served, intended student learning and development outcomes, and program outcomes.
- FAP leaders facilitate continuous development, implementation, and assessment of effectiveness and goal attainment congruent with institutional mission and strategic plans.
- FAP leaders promote environments that provide meaningful opportunities for student learning, development, and engagement.
- FAP leaders develop, adapt, and improve programs and services for populations served and institutional priorities.
- FAP leaders include diverse perspectives to inform decision making.

Rationale:

3.4 Management

- FAP leaders plan, allocate, and monitor the use of fiscal, physical, human, intellectual, and technological resources.
- FAP leaders manage human resource processes including recruitment, selection, performance planning, and succession planning.
- FAP leaders use evidence to inform decisions, incorporate sustainability practices, understand and integrate appropriate technologies, and are knowledgeable about relevant codes and laws.
- FAP leaders assess and take action to mitigate potential risks.
- FAP leaders ensure timely and fair administration of policies regarding financial aid decisions,

proper notification, and appeal processes.

• FAP leaders ensure the development of policies and procedures that provide clear descriptions of the administrative processes; clearly stated criteria used in the decision-making process for awarding financial aid and the source of authority for the criteria employed; steps for appealing, evaluating, or revising policies and procedures; and an effective system to manage the programs, services, and personnel of the FAP.

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Rationale:

3.5 Supervision

- FAP leaders manage human resource processes including professional development, supervision, evaluation, recognition, and reward.
- FAP leaders empower personnel to become effective leaders and to contribute to the effectiveness and success of the unit.
- FAP leaders encourage and support collaboration across the institution and scholarly contributions to the profession.
- FAP leaders identify and address individual, organizational, and environmental conditions that foster or inhibit mission achievement.

Rationale:

3.6 Program Advancement

- FAP leaders advocate for and actively promote the mission and goals of the programs and services.
- FAP leaders advocate for and represent the financial needs of students, the operation and staffing of the financial aid program, and the institution.
- FAP leaders inform stakeholders about issues affecting practice.
- FAP leaders facilitate processes to reach consensus where wide support is needed.
- FAP leaders advocate for representation in strategic planning initiatives at divisional and institutional levels.

Rationale:

Overview Questions:

- 1. Explain the extent to which FAP leader(s) are viewed as and held responsible for advancing the departmental mission.
- 2. Explain the opportunities and limitations present for FAP leader(s) as they seek to fulfill the program mission.
- 3. How do FAP leaders advance the organization?
- 4. How do FAP leaders encourage collaboration across the institution?
- 5. How are FAP leaders accountable for their performance?
- 6. How have FAP leaders empowered personnel and engaged stakeholders?

Part 4: HUMAN RESOURCES

Suggested Evidence and Documentation:

- 1. Program mission, goals, and outcomes
- 2. Operating policy and procedure manuals/statements for program and institution
- 3. Organizational chart(s)



- 4. Personnel handbook, position descriptions (including student employees, volunteers, and graduate students), expectations, and performance review templates
- 5. Annual reports, including data on student utilization and staff-to-student ratios
- 6. Association or benchmark reports on operations and staffing
- 7. Student and staff personnel profiles or resumes, including demographic characteristics, educational background, and previous experience
- 8. Reports on personnel, including student employees and volunteers, employment experiences
- 9. Training agendas and schedules
- 10. Statement of staffing philosophy
- 11. Professional development activities
- 12. Minutes from staff meetings at which human resources related standards were discussed and addressed

Criterion Measures:

DNA	IE	0	1	2	3
Does Not Apply	Insufficient Evidence/	Does Not Meet	Partly Meets	Meets	Exceeds
	Unable to Rate				

4.1 Adequate Staffing and Support

- Financial Aid Programs (FAP) is staffed adequately to accomplish mission and goals.
- FAP has access to technical and support personnel adequate to accomplish the mission.

Rationale:

4.2 Recruitment, Supervision, and Professional Development

- FAP establishes procedures and expectations for personnel recruitment and selection, training, supervision, performance, and evaluation.
- FAP provides personnel access to education and professional development opportunities to improve their competence, skills, and leadership capacity.
- FAP considers work/life options available to personnel to promote recruitment and retention.

Rationale:



4.3 Employment Practices

- Administrators of FAP maintain personnel position descriptions, implement recruitment and hiring strategies that produce an inclusive workforce, and develop promotion practices that are fair, inclusive, proactive, and non-discriminatory.
- Personnel responsible for delivery of programs and services have written performance goals, objectives, and outcomes for each year's performance cycle to be used to plan, review, and evaluate work and performance and update them regularly.
- Results of individual personnel evaluations are used to recognize personnel performance, address performance issues, implement individual and/or collective personnel development and training programs, and inform the assessment of programs and services.

Rationale:



4.4 Personnel Training

• Personnel, including student employees and volunteers, receive appropriate and thorough training when hired and throughout their employment.



- Personnel have access to resources or receive specific training on institutional and governmental policies; procedures and laws pertaining to functions or activities they support; privacy and confidentiality; access to student records; sensitive institutional information; ethical and legal uses of technology; and technology used to store or access student records and institutional data.
- FAP ensures that personnel are knowledgeable of and trained on the rights and responsibilities as an employee of the institution.
- Personnel are trained on how and when to refer those in need of additional assistance to qualified personnel.
- Personnel are trained on systems and technologies necessary to perform their assigned responsibilities.
- Personnel engage in continuing professional development activities to keep abreast of research, theories, legislation, policies, and developments that affect programs and services.
- Administrators ensure that personnel are knowledgeable about and trained in safety, emergency procedures, and crisis prevention and response, including identification of threatening conduct or behavior, and incorporate a system for responding to and reporting such behaviors.
- Personnel are knowledgeable of and trained in safety and emergency procedures for securing and vacating facilities.

Rationale:

4.5 Professional Personnel

• Professional personnel either hold an earned graduate or professional degree in a field relevant to their position or possess an appropriate confirmation of educational credentials and related work experience.

Rationale:

4.6 Interns and Graduate Assistants

- Degree- or credential-seeking interns or graduate assistants are qualified by enrollment in an appropriate field of study and by relevant experience.
- Degree- or credential-seeking interns or graduate assistants are trained and supervised by professional personnel who possess applicable educational credentials and work experience, have supervisory experience and are cognizant of the dual roles of interns and graduate assistants as students and employees.
- Supervisors of interns or graduate assistants adhere to parameters of students' job descriptions, articulate intended learning outcomes in student job descriptions, adhere to agreed-upon work hours and schedules, and offer flexible scheduling when circumstances necessitate.
- Supervisors and students both agree to suitable compensation if circumstances necessitate additional hours.

Rationale:



4.7 Student Employees and Volunteers

• Student employees and volunteers are carefully selected, trained, supervised, and evaluated; have access to a supervisor; and are provided clear job descriptions, pre-service training based on assessed needs, and continuing development.

Rationale:



4.8 Privacy and Confidentiality

• FAP personnel protect the privacy of students and ensure the confidentiality of personal circumstances.

Rationale:

Overview Questions:

- 1. In what ways are personnel qualifications examined, performance evaluated, and personnel recognized for exemplary performance?
- 2. How are professional development efforts designed, how do they support achievement of FAP mission, and how do they prepare and educate staff on relevant information?
- 3. How has the staffing model been developed to ensure successful program operations?
- 4. Describe FAP philosophy toward engaging graduate interns and assistants, and student employees and volunteers in the program human resource pool.

Part 5: ETHICS

Suggested Evidence and Documentation:

- 1. Program code or statement of ethics
- 2. Ethics statements from relevant functional area professional associations
- 3. Personnel policies, procedures and/or handbook
- 4. Student code of conduct
- 5. Operating policies and procedures related to human subjects research (Institutional Review Board, IRB)
- 6. Minutes from meetings during which staff reviewed and discussed ethics

Criterion Measures:

DNA	IE	0	1	2	3
Does Not Apply	Insufficient Evidence/	Does Not Meet	Partly Meets	Meets	Exceeds
	Unable to Rate				

5.1 Ethical Standards

- Financial Aid Programs (FAP) reviews applicable professional ethical standards and adopts or develops and implements appropriate statements of ethical practice.
- FAP publishes and adheres to statements of ethical practice, ensures their periodic review, and orients new personnel to relevant statements of ethical practice and related institutional policies.

Rationale:



5.2 Statement of Ethical Standards

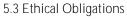
- Statements of ethical standards specify that FAP personnel respect privacy and maintain confidentiality in communications and records as delineated by privacy laws.
- Statements of ethical standards specify limits on disclosure of information contained in students' records as well as requirements to disclose to appropriate authorities.
- Statements of ethical standards address conflicts of interest, or appearance thereof, by personnel in the performance of their work and reflect the responsibility of personnel to be fair, objective, and impartial in their interactions with others.

• Statements of ethical standards reference management of institutional funds, appropriate behavior regarding research and assessment with human participants, confidentiality of research and assessment data, students' rights and responsibilities, and issues surrounding scholarly integrity.

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• Statements of ethical standards include the expectation that personnel confront and hold accountable other personnel who exhibit unethical behavior.

Rationale:



- FAP personnel employ ethical decision making in the performance of their duties.
- FAP personnel inform users of programs and services of ethical obligations and limitations emanating from codes and laws or from licensure requirements.
- FAP avoids misrepresentation as defined by applicable laws, regulations, and policies.
- FAP personnel recognize and avoid conflicts of interest that could adversely influence their judgment or objectivity and, when unavoidable, recuse themselves from the situation.
- FAP personnel perform their duties within the scope of their position, training, expertise, and competence and make referrals when issues presented exceed the scope of the position.

Rationale:

Overview Questions:

- 1. What is FAP's strategy for managing student and personnel confidentiality and privacy issues?
- 2. How are ethical dilemmas and conflicts of interest identified and addressed?
- 3. How are ethics incorporated into the daily management and decision-making processes of FAP?

Part 6: LAW, POLICY, AND GOVERNANCE

Suggested Evidence and Documentation:

- 1. Emergency procedures
- 2. Operating policies and procedures
- 3. Personnel policies, procedures and/or handbook
- 4. Institutional codes of conduct
- 5. Contracts
- 6. Copies of related laws and legal obligations
- 7. Resources of professional liability insurance

Criterion Measures:

DNA	IE	0	1	2	3
Does Not Apply	Insufficient Evidence/	Does Not Meet	Partly Meets	Meets	Exceeds
	Unable to Rate				

6.1 Legal Obligations and Responsibilities

- Financial Aid Programs (FAP) is in compliance with laws, regulations, and policies that relate to their respective responsibilities and that pose legal obligations, limitations, risks, and liabilities for the institution as a whole.
- Financial aid is awarded in compliance with applicable rules and regulations governing financial aid.
- FAP has access to legal advice needed for personnel to carry out their assigned responsibilities.

FAP informs personnel, appropriate officials, and users of programs and services about existing and

Council for the

changing legal obligations, risks and liabilities, and limitations.
FAP informs personnel about professional liability insurance options and refer them to external sources if the institution does not provide coverage.

Rationale:

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6.2 Policies and Procedures

- FAP has written policies and procedures on operations, transactions, or tasks that have legal implications.
- FAP regularly reviews policies that are informed by best practices, available evidence, and policy issues in higher education.
- FAP has procedures, systems and guidelines consistent with institutional policy for responding to threats, emergencies, and crisis situations and disseminate timely and accurate information to students, other members of the institutional community, and appropriate external organizations during emergency situations.

Rationale:

6.3 Harassment and Hostile Environments

• FAP personnel neither participate in nor condone any form of harassment or activity that demeans persons or creates an intimidating, hostile, or offensive environment.

Rationale:



6.4 Copyright Compliance

• FAP purchases or obtains permission to use copyrighted materials and instruments and includes appropriate citations on materials and instruments.

Rationale:

6.5 Governance

• FAP informs personnel about internal and external governance organizations that affect programs and services.

Rationale:

Overview Questions:

- 1. What are the crucial legal, policy and, governance issues faced by FAP, and how are they addressed?
- 2. How are personnel instructed, advised, or assisted with legal, policy, and governance concerns?
- 3. How are personnel informed about internal and external governance systems?

Part 7: DIVERSITY, EQUITY, AND ACCESS

Suggested Evidence and Documentation:

- 1. Diversity statements
- 2. Goals and objectives related to diversity, equity, and access



- 3. Training plans and agendas for personnel
- 4. Lists of programs and curriculums related to diversity, equity, and access
- 5. Personnel policies, procedures, and/or handbook (specifically statements against harassment or discrimination)
- 6. Facilities audit
- 7. Assessment results such as participation rates, demographics, campus climate, and student needs

Criterion Measures:

DNA	IE	0	1	2	3
Does Not Apply	Insufficient Evidence/	Does Not Meet	Partly Meets	Meets	Exceeds
	Unable to Rate				

- 7.1 Inclusive Work Environments
 - Financial Aid Programs (FAP) creates and maintains educational work environments that are welcoming, accessible, inclusive, equitable, and free from harassment.
 - FAP does not discriminate on the basis of ability; age; cultural identity; ethnicity; family educational history; gender identity and expression; nationality; political affiliation; race; religious affiliation; sex; sexual orientation; economic, marital, social, or veteran status; or any other basis included in institutional policies and codes and laws.

Rationale:

- 7.2 Structural Aspects of Equity, Access, and Inclusion
 - FAP ensures physical, program, and resource access for all constituents; modifies or removes policies, practices, systems, technologies, facilities, and structures that create barriers or produce inequities; and ensures that when facilities and structures cannot be modified, they do not impede access.
 - FAP responds to the needs of all constituents served when establishing hours of operation and developing methods of delivering programs, services, and resources.
 - FAP recognizes the needs of distance and online learning students by directly providing or assisting them to gain access to comparable services and resources.

Rationale:

7.3 Ensuring Diversity, Equity, and Access

- FAP advocates for sensitivity to multicultural and social justice concerns by the institution and its personnel.
- FAP establishes goals for diversity, equity, and access; fosters communication and practices that enhance understanding of identity, culture, self-expression, and heritage; and promotes respect for commonalities and differences among people within their historical and cultural contexts.
- FAP addresses the characteristics and needs of diverse constituents when establishing and implementing culturally relevant and inclusive programs, services, policies, procedures, and practices.
- FAP provides personnel with diversity, equity, and access training and holds personnel accountable for applying the training to their work.

Rationale:

Overview Questions:



- 1. How does FAP ensure constituents experience a welcoming, accessible, and inclusive environment that is equitable and free from harassment?
- 2. How does FAP address imbalance in participation among selected populations of students?
- 3. How does FAP address imbalance in staffing patterns among selected populations of program personnel?
- 4. How does FAP ensure cultural competence of its personnel to ensure inclusion in the program?
- 5. How does FAP encourage and provide opportunities for ongoing professional development for its personnel?

Part 8: INTERNAL AND EXTERNAL RELATIONS

Suggested Evidence and Documentation:

- 1. Promotional material (brochures/sources of information about the program, catalogs, brochures, staff and student handbooks)
- 2. Media procedures and guidelines
- 3. List and description of relationships with internal and external partners
- 4. Minutes from meetings/interactions with key stakeholders

Criterion Measures:

DNA	IE	0	1	2	3
Does Not Apply	Insufficient Evidence/	Does Not Meet	Partly Meets	Meets	Exceeds
	Unable to Rate				

8.1 Internal and External Populations

- Financial Aid Programs (FAP) reaches out to internal and external populations to establish, maintain, and promote understanding and effective relations with those that have a significant interest in or potential effect on the students or other constituents served by the programs and services.
- FAP reaches out to internal and external populations to garner support and resources for programs and services, collaborate in offering or improving programs and services to meet the needs of students and other constituents and to achieve program and student outcomes, and engage diverse individuals, groups, communities, and organizations to enrich the educational environment and experiences of students and other constituents.
- FAP reaches out to internal and external populations to disseminate information about the programs and services.

Rationale:

8.2 Marketing

• Promotional and descriptive information is accurate and free of deception and misrepresentation.

Rationale:



8.3 Procedures and Guidelines

• FAP has procedures and guidelines consistent with institutional policy to communicate with the media; distribute information through print, broadcast, and online sources; contract with external organizations for delivery of programs and services; cultivate, solicit, and manage gifts; and apply to and manage funds from grants.



- Financial aid and admission decisions are made independently.
- FAP has access to appropriate information in the student's admission file to assure compliance with applicable rules and regulations and to assist in awarding scholarships.

Rationale:

Overview Questions:

- 1. With which relevant individuals, campus offices, and external agencies must FAP maintain effective relations? Why are these relationships important, and how are they mutually beneficial?
- 2. How does FAP maintain effective relationships with program constituents?
- 3. How does FAP assess the effectiveness of its relations with individuals, campus offices and external agencies?

Part 9: FINANCIAL RESOURCES

Suggested Evidence and Documentation:

- 1. Budgets and the budget process
- 2. Financial statements and audit reports
- 3. Student fee process and allocation (if applicable)
- 4. Financial statements for grants, gifts, and other external resources

Criterion Measures:

DNA	IE	0	1	2	3
Does Not Apply	Insufficient Evidence/	Does Not Meet	Partly Meets	Meets	Exceeds
	Unable to Rate				



9.1 Adequate Funding

• Financial Aid Programs (FAP) has funding to accomplish its mission and goals.

Rationale:



9.2 Financial Planning and Implementation

- FAP conducts a comprehensive analysis to determine unmet needs, relevant expenditures, external and internal resources, and impact on students and the institution.
- FAP uses the budget as a planning tool to reflect commitment to the mission and goals of the programs and services and of the institution.
- Financial reports provide an accurate financial overview of the organization and provide clear, understandable, and timely data upon which personnel can plan and make informed decisions.

Rationale:



9.3 Policies, Procedures, and Protocols

- FAP administers funds in accordance with established institutional accounting procedures.
- FAP demonstrates efficient and effective use and responsible stewardship of fiscal resources consistent with institutional protocols.
- Procurement procedures are consistent with institutional policies, ensure purchases comply with laws and codes for usability and access, ensure the institution receives value for the funds spent, and consider information available for comparing the ethical and environmental impact of products

and services purchased.

Rationale:

Overview Questions:

- 1. What is the funding strategy for FAP, and why is this the most appropriate approach?
- 2. How does FAP ensure fiscal responsibility, responsible stewardship, and cost-effectiveness?
- 3. If applicable, how does FAP go about increasing financial resources?

Part 10: TECHNOLOGY

Suggested Evidence and Documentation:

- 1. Technology policies and procedures
- 2. Equipment inventory

Criterion Measures:

DNA	IE	0	1	2	3
Does Not Apply	Insufficient Evidence/	Does Not Meet	Partly Meets	Meets	Exceeds
	Unable to Rate				

10.1 Current and Adequate Technology

• Financial Aid Programs (FAP) has adequate technology to support achievement of its mission and goals.

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• Use of technology complies with institutional policies and procedures and relevant codes and laws.

Rationale:



10.2 Use of Technology

- FAP uses current technology to provide updated information regarding mission, location, staffing, programs, services, and official contacts to students and other constituents in accessible formats.
- FAP uses current technology to provide an avenue for students and other constituents to communicate sensitive information in a secure format, and enhance the delivery of programs and services for all students.

Rationale:



10.3 Data Protection and Upgrades

- FAP backs up data on a regular basis.
- FAP articulates and adheres to policies and procedures regarding ethical and legal use of technology, as well as for protecting the confidentiality and security of information.
- FAP implements a replacement plan and cycle for all technology with attention to sustainability and incorporates accessibility features into technology-based programs and services.

Rationale:



10.4 Student Technology Access

• FAP has policies on student use of technology that are clear, easy to understand, and available to all students.

• FAP provides information or referral to support services for those needing assistance in accessing or using technology, provides instruction or training on how to use the technology, and informs students of implications of misuse of technologies.

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Rationale:

Overview Questions:

- 1. How is technology inventoried, maintained, and updated?
- 2. How is information security maintained?
- 3. How does FAP ensure that relevant technology is available for all who are served by the program?
- 4. How does FAP use technology to enhance the delivery of programs, resources, services and overall operations?
- 5. How does FAP utilize technology to foster its learning outcomes?

Part 11: FACILITIES AND EQUIPMENT

Suggested Evidence and Documentation:

- 1. Equipment inventory
- 2. Facilities audit and plans for renovations, additions, and enhancements
- 3. Capital projects, if applicable
- 4. Structural design or maps to show space allocation
- 5. Images of the space

Criterion Measures:

DNA	IE	0	1	2	3
Does Not Apply	Insufficient Evidence/	Does Not Meet	Partly Meets	Meets	Exceeds
	Unable to Rate				



11.1 Design of Facilities

- Financial Aid Programs (FAP) facilities are intentionally designed and located in suitable, accessible, and safe spaces that demonstrate universal design and support the program's mission and goals.
- Facilities are designed to engage various constituents and promote learning.
- The design of the facilities guarantees the security and privacy of records and ensures the confidentiality of sensitive information and conversations.

Rationale:



11.2 Work Space

- Personnel have workspaces that are suitably located and accessible, well equipped, adequate in size, and designed to support their work and responsibilities.
- Personnel are able to secure their work.

Rationale:



11.3 Equipment Acquisition and Facilities Use

- FAP incorporates sustainable practices in use of facilities and purchase of equipment.
- Facilities and equipment are evaluated on an established cycle and are in compliance with codes,



laws, and accepted practices for access, health, safety, and security.

 When acquiring capital equipment, FAP takes into account expenses related to regular maintenance and life-cycle costs.

Rationale:

Overview Questions:

- 1. How are facilities inventoried and maintained?
- 2. How does FAP integrate sustainable practices?
- 3. How does FAP ensure that facilities, workspaces, and equipment are considered in decision-making?
- 4. How is FAP intentional about space allocation and usage?

Part 12: ASSESSMENT

Suggested Evidence and Documentation:

- 1. Program goals, key indicators, outcomes, and related assessment data
- 2. Program student learning and development outcomes and related assessment data
- 3. Description of assessment cycle
- 4. Assessment plans and annual assessment reports
- 5. Minutes of meetings at which assessment activities and results discussed
- 6. Professional development activities to improve assessment competence

Criterion Measures:

DNA	IE	0	1	2	3
Does Not Apply	Insufficient Evidence/	Does Not Meet	Partly Meets	Meets	Exceeds
	Unable to Rate				

12.1 Assessment Plan and Practice

- Financial Aid Programs (FAP) develops an ongoing cycle of assessment plans, processes, and activities.
- FAP identifies programmatic goals and intended program outcomes as well as outcomes for student learning and development.
- FAP documents progress toward achievement of goals and outcomes.
- FAP employs multiple measures, methods, and manageable processes for gathering, interpreting, and evaluating data.
- FAP employs ethical practices in the assessment process.
- FAP has access to adequate fiscal, human, professional development, and technological resources to develop and implement assessment plans.

Rationale:

12.2 Reporting and Implementing Results

- FAP interprets and uses assessment results to demonstrate accountability and inform planning and decision-making.
- FAP reports aggregated results to respondent groups and stakeholders.
- FAP assesses effectiveness of implemented changes and provides evidence of improvement of programs and services.

Rationale:



Overview Questions:

- 1. What is the comprehensive assessment strategy for FAP?
- 2. What are priorities of the assessment program, and how are those developed?
- 3. How does FAP integrate assessment and evaluation into all aspects of daily operations (e.g., advising, event planning)?
- 4. How are tangible, measurable learning and program outcomes determined to ensure FAP achievement of mission and goals?
- 5. How effective is the assessment strategy in demonstrating goal achievement and student learning?
- 6. How does FAP use assessment results to inform program improvement?
- 7. How does FAP share assessment results with relevant constituencies?
- 8. How does FAP support ongoing development of assessment competencies for personnel?

General Standards revised in 2014;

FAP content developed/revised in 1986, 1997, 2005, and 2014



Work Form A – Rating Discrepancies

INSTRUCTIONS:

This work form should be completed following a review of the individual ratings of the team members. Item numbers for which there is a substantial rating discrepancy should be discussed before completing the remaining work forms. Discrepancies among ratings should be identified, discussed, and reconciled for consensus.

Part	Discrepancies	Resolution/Final Decision
1. Mission		
2. Program		
3. Organization and Leadership		
4. Human Resources		
5. Ethics		
6. Law, Policy, and Governance		
7. Diversity, Equity, and Access		
8. Internal and External Relations		
9. Financial Resources		
10. Technology		
11. Facilities and Equipment		
12. Assessment		



Work Form B – Strengths and Areas for Improvement

INSTRUCTIONS:

This work form should be completed following a review of the individual ratings of the team members. Examine the ratings of each criterion measure by the team members, and record the following in the form below:

- Strengths: Item number(s) for which all participants have given a rating of 3, indicating agreement that the criterion *exceeds* the standard.
- Areas for Improvement: Item number(s) for which all participants have given a rating of 0 or 1, indicating agreement that the criterion *does not meet* or *partly meets* the standard. Items rated IE for *insufficient evidence/unable to rate* should be listed here as well.

Note – Items not listed in one of these categories represent consensus among the raters that practice in that area is satisfactory, having been rated a 2, which indicates agreement that the criterion *meets* the standard.

Part	Strengths: Items that exceed the standard (consensus ratings = 3)	Areas for Improvement: Items that do not meet or partly meet the standard (consensus ratings = 0, 1)
1. Mission		
2. Program		
3. Organization and Leadership		
4. Human Resources		
5. Ethics		
6. Law, Policy, and Governance		
7. Diversity, Equity, and Access		
8. Internal and External Relations		
9. Financial Resources		



10. Technology	
11. Facilities and Equipment	
12. Assessment	



Work Form C – Recommendations for Unit Action

INSTRUCTIONS:

This is the last form to be completed by the review team. List the items needing follow-up action for improvement and indicate what requires attention. The team or coordinator should consider including any criterion measure rated as being not met by the reviewers, as well as those with significant discrepancies that are not resolved by team discussion.

Part	Item Requiring Attention
1. Mission	
2. Program	
3. Organization and Leadership	
4. Human Resources	
5. Ethics	
6. Law, Policy, and Governance	
7. Diversity, Equity, and Access	
8. Internal and External Relations	
9. Financial Resources	
10. Technology	
11. Facilities and Equipment	
12. Assessment	



Work Form D – Beginning the Action Plan

INSTRUCTIONS:

This work form is for use by the staff of the unit being reviewed and is the first step in identifying the actions to be taken as a consequence of study results. Using the Items Requiring Attention listed in Work Form C, write a brief action plan that identifies the focus and intended outcomes of the next steps in to be taken in each area.

Part 1. Mission

Part 2. Program

Part 3. Organization and Leadership

Part 4. Human Resources

Part 5. Ethics

Part 6. Law, Policy, and Governance

Part 7. Diversity, Equity, and Access

Part 8. Internal and External Relations

Part 9. Financial Resources



Part 10. Technology

Part 11. Facilities and Equipment

Part 12. Assessment



Work Form E – Action Plan

INSTRUCTIONS:

Using this work form, the unit staff will turn the summary of areas to be addressed identified by the review team (Work Form D) into a specific plan of action. After reviewing the information provided in Work Forms B and C, unit staff teams should describe practices in need of improvement, the actions to be taken, the individual responsible, and the timeline for achieving compliance with the standard.

Current Practice Description	Corrective Action Needed	Task Assigned To	Timeline/ Due Dates



FINANCIAL AID PROGRAMS

CAS Standards and Guidelines

Part 1. MISSION

The mission of Financial Aid Programs (FAP) is to develop, review, and disseminate financial resources and information to students to assist them in achieving their educational goals from pre-enrollment through graduation.

FAP must develop, disseminate, implement, and regularly review their missions, which must be consistent with the mission of the institution and with applicable professional standards. The mission must be appropriate for the institution's students and other constituents. Mission statements must reference student learning and development.

FAP goals must be consistent with the mission, goals, policies, procedures, and characteristics of the institution and compatible with the ability of the institution to provide adequate resources to meet the needs and educational goals of students.

Institutional goals for financial aid must be developed and reviewed regularly. Goals must comply with laws, regulations, policies, and other providers of funding.

Such goals must be consistent with statements of good practices articulated by relevant and appropriate professional associations such as the National Association of Student Financial Aid Administrators and the Canadian Association of Student Financial Aid Administrators.

Part 2. PROGRAM

To achieve their mission, Financial Aid Programs (FAP) must contribute to

- students' formal education, which includes both the curriculum and the co-curriculum
- student progression and timely completion of educational goals
- preparation of students for their careers, citizenship, and lives
- student learning and development •

To contribute to student learning and development, FAP must

- identify relevant and desirable student learning and development outcomes •
- articulate how the student learning and development outcomes align with the six CAS student learning and development domains and related dimensions
- assess relevant and desirable student learning and development
- provide evidence of impact on outcomes •
- articulate contributions to or support of student learning and development in the domains not specifically assessed
- use evidence gathered to create strategies for improvement of programs and services •

STUDENT LEARNING AND DEVELOPMENT DOMAINS AND DIMENSIONS.



Domain: knowledge acquisition, integration, construction, and application

• Dimensions: understanding knowledge from a range of disciplines; connecting knowledge to other knowledge, ideas, and experiences; constructing knowledge; and relating knowledge to daily life

Domain: cognitive complexity

• Dimensions: critical thinking, reflective thinking, effective reasoning, and creativity

Domain: intrapersonal development

• Dimensions: realistic self-appraisal, self-understanding, and self-respect; identity development; commitment to ethics and integrity; and spiritual awareness

Domain: interpersonal competence

• Dimensions: meaningful relationships, interdependence, collaboration, and effective leadership

Domain: humanitarianism and civic engagement

• Dimensions: understanding and appreciation of cultural and human differences, social responsibility, global perspective, and sense of civic responsibility

Domain: practical competence

• Dimensions: pursuing goals, communicating effectively, technical competence, managing personal affairs, managing career development, demonstrating professionalism, maintaining health and wellness, and living a purposeful and satisfying life

[LD Outcomes: See *The Council for the Advancement of Standards Learning and Development Outcomes* statement for examples of outcomes related to these domains and dimensions.]

FAP must be

- intentionally designed
- guided by theories and knowledge of learning and development
- integrated into the life of the institution
- reflective of developmental and demographic profiles of the student population
- responsive to needs of individuals, populations with distinct needs, and relevant constituencies
- delivered using multiple formats, strategies, and contexts
- designed to provide universal access

FAP must collaborate with colleagues and departments across the institution to promote student learning and development, persistence, and success.



FAP must assist students by addressing financial issues that may serve as barriers to enrollment and the achievement of educational goals. Issues include

• Students in Transition

Financial aid administrators must track student financial aid histories and the impact of past aid on receiving aid in the future.

FAP personnel should consider that students move from secondary to postsecondary education, from one postsecondary institution to another, from undergraduate to graduate school, as well as return from a period of non-enrollment to formal learning or re-enrollment in the institution.

• Financial Aid Practices

Practices must establish, promulgate, and implement financial aid criteria that accurately represent the financial needs of the applicant pool, set priorities within the applicant group, and respond with funding to the extent possible.

• Financial Counseling

Financial counseling must provide services to students for (a) the purpose of providing better understanding of financial aid, (b) financial guidance, (c) individual review of situations that may require special consideration, (d) guidance in academic and financial matters especially as they relate to satisfactory academic progress, and (e) guidance on default management, budgeting, and loan repayment.

FAP leaders should provide information for students, parents/guardians, and families to conduct a cost/benefit analysis of college enrollment.

FAP must

- promote and maintain integrity, accuracy, and timeliness in the delivery of financial aid
- provide comprehensive information and clear policies and procedures for students and their parents/guardians and families to make informed decisions regarding the financing of their education
- clarify the types of financial assistance to the student

Print and online communication must include financial aid deadlines and information on opportunities for financial aid.

Part 3. ORGANIZATION AND LEADERSHIP

To achieve program and student learning and development outcomes, Financial Aid Programs (FAP) must be purposefully structured for effectiveness. FAP must have clearly stated and current

• goals and outcomes



- policies and procedures
- responsibilities and performance expectations for personnel
- organizational charts demonstrating clear channels of authority

Leaders must model ethical behavior and institutional citizenship.

Leaders with organizational authority for FAP must provide strategic planning, management and supervision, and program advancement.

Strategic Planning

- articulate a vision and mission that drive short- and long-term planning
- set goals and objectives based on the needs of the populations served, intended student learning and development outcomes, and program outcomes
- facilitate continuous development, implementation, and assessment of program effectiveness and goal attainment congruent with institutional mission and strategic plans
- promote environments that provide opportunities for student learning, development, and engagement
- develop, adapt, and improve programs and services in response to the changing needs of populations served and evolving institutional priorities
- include diverse perspectives to inform decision making

Management and Supervision

- plan, allocate, and monitor the use of fiscal, physical, human, intellectual, and technological resources
- manage human resource processes including recruitment, selection, professional development, supervision, performance planning, succession planning, evaluation, recognition, and reward
- influence others to contribute to the effectiveness and success of the unit
- empower professional, support, and student personnel to become effective leaders
- encourage and support collaboration with colleagues and departments across the institution
- encourage and support scholarly contributions to the profession
- identify and address individual, organizational, and environmental conditions that foster or inhibit mission achievement
- use current and valid evidence to inform decisions
- incorporate sustainability practices in the management and design of programs, services, and facilities
- understand appropriate technologies and integrate them into programs and services
- be knowledgeable about codes and laws relevant to programs and services and ensure that programs and services meet those requirements
- assess and take action to mitigate potential risks

Program Advancement

- advocate for and actively promote the mission and goals of the programs and services
- inform stakeholders about issues affecting practice
- facilitate processes to reach consensus where wide support is needed



• advocate for representation in strategic planning initiatives at divisional and institutional levels

FAP leaders must advocate for and represent the financial needs of students, the operation and staffing of the financial aid program, and the institution.

FAP leaders should advocate for financial aid programs at the governmental and policy levels and inform lawmakers on financial aid programs and their benefits.

FAP leaders must ensure timely and fair administration of policies regarding financial aid decisions, proper notification, and appeal processes.

A FAP leader with appropriate financial aid experience and training should be designated to lead the FAP staff.

FAP leaders must ensure the development of

- policies and procedures that provide clear descriptions of the administrative processes
- clearly stated criteria used in the decision-making process for awarding financial aid and the source of authority for the criteria employed
- steps for appealing, evaluating, or revising policies and procedures
- an effective system to manage the programs, services, and personnel of the FAP

Part 4. HUMAN RESOURCES

Financial Aid Programs (FAP) must be staffed adequately by individuals qualified to accomplish mission and goals.

FAP must have access to technical and support personnel adequate to accomplish their mission.

Within institutional guidelines, FAP must

- establish procedures for personnel recruitment and selection, training, performance planning, and evaluation
- set expectations for supervision and performance
- provide personnel access to continuing and advanced education and appropriate professional development opportunities to improve their competence, skills, and leadership capacity
- consider work/life options available to personnel (e.g., compressed work schedules, flextime, job sharing, remote work, or telework) to promote recruitment and retention of personnel

Administrators of FAP must

- ensure that all personnel have updated position descriptions
- implement recruitment and selection/hiring strategies that produce a workforce inclusive of under-represented populations
- develop promotion practices that are fair, inclusive, proactive, and non-discriminatory



Personnel responsible for delivery of FAP must have written performance goals, objectives, and outcomes **for each year's performance cycle to be used to plan, review, and evaluate work and performance. The** performance plan must be updated regularly to reflect changes during the performance cycle.

Results of individual personnel evaluations must be used to recognize personnel performance, address performance issues, implement individual and/or collective personnel development and training programs, and inform the assessment of programs and services.

FAP personnel, when hired and throughout their employment, must receive appropriate and thorough training.

Suggested formal training in preparation for professional financial aid employment includes fields such as business administration, computer sciences, information systems, college student affairs, higher education administration, counseling, and other human behavior disciplines; course work may include computer literacy, research and statistical methods, counseling, legal issues of higher education, leadership and management, or any related degree program or certification.

Additional training may include conferences, webinars, workshops, and other specialized training in financial aid, enrollment management, customer/student service, advising, or other higher education fields.

Institutional training for all FAP personnel should include familiarization with campus facilities, publications, academic programs, admission policies, institutional financial aid policies and procedures, and services of the institution.

FAP personnel, including student employees and volunteers, must have access to resources or receive specific training on

- institutional policies pertaining to functions or activities they support
- privacy and confidentiality policies
- laws regarding access to student records
- policies and procedures for dealing with sensitive institutional information
- policies and procedures related to technology used to store or access student records and institutional data
- how and when to refer those in need of additional assistance to qualified personnel and have access to a supervisor for assistance in making these judgments
- systems and technologies necessary to perform their assigned responsibilities
- ethical and legal uses of technology

FAP must ensure that personnel are knowledgeable of and trained on the rights and responsibilities as an employee of the institution.

FAP personnel must engage in continuing professional development activities to keep abreast of the research, theories, legislation, policies, and developments that affect their programs and services.



Administrators of FAP must ensure that personnel are knowledgeable about and trained in safety, emergency procedures, and crisis prevention and response. Risk management efforts must address identification of threatening conduct or behavior and must incorporate a system for responding to and reporting such behaviors.

FAP personnel must be knowledgeable of and trained in safety and emergency procedures for securing and vacating facilities.

PROFESSIONAL PERSONNEL

FAP professional personnel either must hold an earned graduate or professional degree in a field relevant to their position or must possess an appropriate combination of educational credentials and related work experience.

Professional association staffing models may be utilized by FAP leadership to determine appropriate staffing levels.

Professional association publications may be utilized by FAP leadership to determine appropriate compensation for personnel.

Support personnel should be skilled in interpersonal communications, public relations, referral techniques, and dissemination of information. Support personnel with higher technical responsibilities should possess the academic background and experience for effective performance.

INTERNS OR GRADUATE ASSISTANTS

Degree- or credential-seeking interns or graduate assistants must be qualified by enrollment in an appropriate field of study and relevant experience. These students must be trained and supervised by professional personnel who possess applicable educational credentials and work experience and have supervisory experience. Supervisors must be cognizant of the dual roles interns and graduate assistants have as both student and employee.

Supervisors must

- adhere to parameters of students' job descriptions
- articulate intended learning outcomes in student job descriptions
- adhere to agreed-upon work hours and schedules
- offer flexible scheduling when circumstances necessitate

Supervisors and students must both agree to suitable compensation if circumstances necessitate additional hours.

STUDENT EMPLOYEES AND VOLUNTEERS



Student employees and volunteers must be carefully selected, trained, supervised, and evaluated. Students must have access to a supervisor. Student employees and volunteers must be provided clear job descriptions, pre-service training based on assessed needs, and continuing development.

If student employees and volunteers will be assisting students, parents/guardians, and families, they should be trained in public relations, referral techniques, peer counseling, and dissemination of information.

FAP personnel must protect the privacy of students and ensure the confidentiality of personal circumstances.

All FAP personnel should be

- willing to seek out and implement new ideas
- able to translate new ideas into practical methods for improving the overall operation of the financial aid program
- willing to seek out and use new conceptual frameworks, equipment, and technology that bring information to students more clearly and effectively
- aware of relevant developments in higher education and be able to incorporate these developments

Part 5. ETHICS

Financial Aid Programs (FAP) must

- review applicable professional ethical standards and must adopt or develop and implement appropriate statements of ethical practice
- publish and adhere to statements of ethical practice and ensure their periodic review
- orient new personnel to relevant ethical standards and statements of ethical practice and related institutional policies

Statements of ethical standards must

- specify that FAP personnel respect privacy and maintain confidentiality in communications and records as delineated by privacy laws
- specify limits on disclosure of information contained in students' records as well as requirements to disclose to appropriate authorities
- address conflicts of interest, or appearance thereof, by personnel in the performance of their work
- reflect the responsibility of personnel to be fair, objective, and impartial in their interactions with others
- reference management of institutional funds
- reference appropriate behavior regarding research and assessment with human participants, confidentiality of research and assessment data, and students' rights and responsibilities
- include the expectation that personnel confront and hold accountable other personnel who exhibit unethical behavior
- address issues surrounding scholarly integrity

When conflict exists between the mission and goals of the institution and the educational goals of the student, students must be given relevant information for decision making.



FAP personnel must

- employ ethical decision making in the performance of their duties
- inform users of programs and services of ethical obligations and limitations emanating from codes and laws or from licensure requirements
- recognize and avoid conflicts of interest that could adversely influence their judgment or objectivity and, when unavoidable, recuse themselves from the situation
- perform their duties within the scope of their position, training, expertise, and competence
- make referrals when issues presented exceed the scope of the position

FAP must avoid misrepresentation as defined by applicable laws, regulations, and policies.

Part 6. LAW, POLICY, AND GOVERNANCE

Financial Aid Programs (FAP) must be in compliance with laws, regulations, and policies that relate to their respective responsibilities and that pose legal obligations, limitations, risks, and liabilities for the institution as a whole. Examples include constitutional, statutory, regulatory, and case law; relevant law and orders emanating from codes and laws; and the institution's policies.

Financial aid must be awarded in compliance with applicable rules and regulations governing financial aid.

FAP must have access to legal advice needed for personnel to carry out their assigned responsibilities.

FAP must inform personnel, appropriate officials, and users of programs and services about existing and changing legal obligations, risks and liabilities, and limitations.

FAP must inform personnel about professional liability insurance options and refer them to external sources if the institution does not provide coverage.

FAP must have written policies and procedures on operations, transactions, or tasks that have legal implications.

When appropriate, FAP leaders and personnel may need to exercise professional judgment in making exceptions to established financial aid policies. These decisions should be made in a fair and objective manner with supporting documentation that meets the criteria for evidence-based decisions.

FAP must regularly review policies. The revision and creation of policies must be informed by best practices, available evidence, and policy issues in higher education.

FAP must have procedures and guidelines consistent with institutional policy for responding to threats, emergencies, and crisis situations. Systems and procedures must be in place to disseminate timely and accurate information to students, other members of the institutional community, and appropriate external organizations during emergency situations.



Personnel must neither participate in nor condone any form of harassment or activity that demeans persons or creates an intimidating, hostile, or offensive environment.

FAP must purchase or obtain permission to use copyrighted materials and instruments. References to copyrighted materials and instruments must include appropriate citations.

FAP must inform personnel about internal and external governance organizations that affect programs and services.

Part 7. DIVERSITY, EQUITY, AND ACCESS

Within the context of each institution's mission and in accordance with institutional policies and applicable codes and laws, Financial Aid Programs (FAP) must create and maintain educational and work environments that are welcoming, accessible, inclusive, equitable, and free from harassment.

FAP must not discriminate on the basis of disability; age; race; cultural identity; ethnicity; nationality; family educational history (e.g., first generation to attend college); political affiliation; religious affiliation; sex; sexual orientation; gender identity and expression; marital, social, economic, or veteran status; or any other basis included in institutional policies and codes and laws.

FAP must

- advocate for sensitivity to multicultural and social justice concerns by the institution and its personnel
- ensure physical, program, and resource access for all constituents
- modify or remove policies, practices, systems, technologies, facilities, and structures that create barriers or produce inequities
- ensure that when facilities and structures cannot be modified, they do not impede access to programs, services and resources
- establish goals for diversity, equity, and access
- foster communication and practices that enhance understanding of identity, culture, selfexpression, and heritage
- promote respect for commonalities and differences among people within their historical and cultural contexts
- address the characteristics and needs of diverse constituents when establishing and implementing culturally relevant and inclusive programs, services, policies, procedures, and practices
- provide personnel with diversity, equity, and access training and hold personnel accountable for applying the training to their work
- respond to the needs of all constituents served when establishing hours of operation and developing methods of delivering programs, services, and resources
- recognize the needs of distance and online learning students by directly providing or assisting them to gain access to comparable services and resources

FAP staff members should be sensitive to the needs of first generation, nontraditional, under-represented students, and students with special needs.



Part 8. INTERNAL AND EXTERNAL RELATIONS

Financial Aid Programs (FAP) must reach out to individuals, groups, communities, and organizations internal and external to the institution to

- establish, maintain, and promote understanding and effective relations with those that have a significant interest in or potential effect on the students or other constituents served by the programs and services
- garner support and resources for programs and services as defined by the mission
- collaborate in offering or improving programs and services to meet the needs of students and other constituents and to achieve program and student outcomes
- engage diverse individuals, groups, communities, and organizations to enrich the educational environment and experiences of students and other constituents
- disseminate information about the programs and services

FAP should maintain relationships with interested groups within the community regarding general and institutional financial aid practices. The community may include grant and scholarship agencies, high schools, and other community outreach programs.

Promotional and descriptive information must be accurate and free of deception and misrepresentation.

FAP must have procedures and guidelines consistent with institutional policy for

- communicating with the media
- distributing information through print, broadcast, and online sources
- contracting with external organizations for delivery of programs and services
- cultivating, soliciting, and managing gifts
- applying to and managing funds from grants

Financial aid and admission decisions must be made independently.

FAP must have access to appropriate information in the student's admission file to assure compliance with applicable rules and regulations and to assist in awarding scholarships.

Part 9. FINANCIAL RESOURCES

Financial Aid Programs (FAP) must have funding to accomplish the mission and goals.

In establishing and prioritizing funding resources, FAP must conduct comprehensive analyses to determine

- unmet needs of the unit
- relevant expenditures
- external and internal resources
- impact on students and the institution



FAP must use the budget as a planning tool to reflect commitment to the mission and goals of the programs and services and of the institution.

FAP must administer funds in accordance with established institutional accounting procedures.

FAP must demonstrate efficient and effective use and responsible stewardship of fiscal resources consistent with institutional protocols.

Financial reports must provide an accurate financial overview of the organization and provide clear, understandable, and timely data upon which personnel can plan and make informed decisions.

Procurement procedures must

- be consistent with institutional policies
- ensure that purchases comply with laws and codes for usability and access
- ensure that the institution receives value for the funds spent
- consider information available for comparing the ethical and environmental impact of products and services purchased

Part 10. TECHNOLOGY

Financial Aid Programs (FAP) must have technology to support the achievement of their mission and goals. The technology and its use must comply with institutional policies and procedures and with relevant codes and laws.

FAP must use technologies to

- provide updated information regarding mission, location, staffing, programs, services, and official contacts to students and other constituents in accessible formats
- provide an avenue for students and other constituents to communicate sensitive information in a secure format
- enhance the delivery of programs and services for all students

FAP must

- back up data on a regular basis
- adhere to institutional policies regarding ethical and legal use of technology
- articulate policies and procedures for protecting the confidentiality and security of information
- implement a replacement plan and cycle for all technology with attention to sustainability
- incorporate accessibility features into technology-based programs and services

When providing student access to technology, FAP must

- have policies on the use of technology that are clear, easy to understand, and available to all students
- provide information or referral to support services for those needing assistance in-accessing or using technology
- provide instruction or training on how to use the technology



• inform students of implications of misuse of technologies

Part 11. FACILITIES AND EQUIPMENT

Financial Aid Programs' (FAP) facilities must be intentionally designed and located in suitable, accessible, and safe spaces that demonstrate universal design and support the program's mission and goals.

Facilities must be designed to engage various constituents and promote learning.

Personnel must have workspaces that are suitably located and accessible, well equipped, adequate in size, and designed to support their work and responsibilities.

The design of the facilities must guarantee the security and privacy of records and ensure the confidentiality of sensitive information and conversations. Personnel must be able to secure their work.

FAP must incorporate sustainable practices in use of facilities and purchase of equipment. Facilities and equipment must be evaluated on an established cycle and be in compliance with codes, laws, and accepted practices for access, health, safety and security.

When acquiring capital equipment, FAP must take into account expenses related to regular maintenance and life cycle costs.

Part 12. ASSESSMENT

Financial Aid Programs (FAP) must develop assessment plans and processes.

Assessment plans must articulate an ongoing cycle of assessment activities.

FAP must

- specify programmatic goals and intended outcomes
- identify student learning and development outcomes
- employ multiple measures and methods
- develop manageable processes for gathering, interpreting, and evaluating data
- document progress toward achievement of goals and outcomes
- interpret and use assessment results to demonstrate accountability
- report aggregated results to respondent groups and stakeholders
- use assessment results to inform planning and decision-making
- assess effectiveness of implemented changes
- provide evidence of improvement of programs and services

Assessment resources from governmental agencies and professional associations may be used to evaluate financial aid programs and services.

FAP must employ ethical practices in the assessment process.



FAP must have access to adequate fiscal, human, professional development, and technological resources to develop and implement assessment plans.

General Standards revised in 2014; FAP content developed/revised in 1986, 1997, 2005, and 2014