



800.242.0977

djainfo@gotodja.com

P.O.Box 456

Wichita, KS 67002

## JULY/AUGUST 2025 NEWSLETTER

### IMPORTANT DATES:

#### **August 20**

Campus Based Reallocation  
Form due

#### **August 24-27**

ACCET Annual Conference  
Chicago, IL

#### **September 3**

DJA Webinar: Cash  
Management  
11am CST

#### **September 6-8**

NACCAS Workshop  
Las Vegas, NV

#### **September 8-11**

CSPEN Conference  
Houston, TX

#### **September 13**

24/25 Corrections Due

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- DJA Calendar

*As the long days of summer give way to the brisk pace of fall, the higher education world is anything but quiet. July and August have brought their usual whirlwind—navigating the crossover between award years, racing to meet closeout deadlines, and onboarding waves of new students. But this year, the seasonal hustle comes with an added layer of complexity: the recent passage of the One Big Beautiful Bill Act and a new Executive Order requiring schools to report race-based admission practices. The policy landscape is shifting rapidly, and institutions are balancing the demands of compliance while keeping the academic year on track.*

*To help your school navigate this fast-moving—and sometimes unpredictable—ride, this edition of our newsletter begins with a clear summary of key changes under the OBBA set to affect the higher education industry. The regulatory provisions outlined under the Act are currently in negotiated rulemaking as the two committees hear comments on their focused topics.*

*While the impact of OBBA is set in the future, current regulatory requirements should keep institutions busy with many deadlines looming in the near future. FSA sent out a reminder last month regarding the reporting requirements under the Financial Value Transparency and Gainful employment regulations. The 2024 reporting cycle is due September 30<sup>th</sup> and the 2025 reporting cycle has a deadline soon after on October 1<sup>st</sup>. In addition to reading our article on this topic, be sure to review our section on upcoming deadlines to best prepare your institution.*

*We have waited over a year for the opening of Identity Verification reporting and FSA confirmed the wait is over. Institutions can anticipate the opening of this ability to be provided on August 30<sup>th</sup>- but only for 25/26 reporting' 24/25 will not be required. Lastly, we remind you of the October 1<sup>st</sup> deadline for the Annual Security Report. Visit our Compliance Corner for guidance on what should be included and the necessary disclosures to be shared.*

*Until next month, stay informed and engaged,*

*Renee Ford, Vice President*



## ***IN THE NEWS: SUMMARY OF HIGHER EDUCATION CHANGES UNDER THE OBBBA***

As we mentioned last month, President Trump's One Big Beautiful Bill Act (OBBBA) was signed into law on July 4, 2025. The budget reconciliation bill pushes significant tax cuts and spending changes. These changes will also impact institutions of Higher Education, with most becoming effective July 1, 2026. It is important to note the Senate version removed several provisions pushed by the House that were poised to negatively affect our industry. We've outlined a summary below notating the House provisions that did not make it into final law, as well as a review of the regulatory changes we can expect to see under the Senate version which gained the President's signature.

### **House Provisions that were NOT implemented by the Senate:**

- The House proposed cutting Title IV eligibility for specific non-citizen categories of students. The Senate cited the provision as being incongruent with the Byrd Rule.
- Earlier provisions introduced an adjustment to the need analysis determination as the median cost of college (MCOC) minus the Student Aid Index (SAI) minus other financial aid. The Senate's version removed this provision.
- The House version eliminated subsidized loans for undergraduate students, while the final law removed this provision and retained eligibility for undergraduate students to receive subsidized loans.
- The House sought to increase the full-time definition to 30 credit hours per academic year; however, the Senate maintained the current 24 credit hours per academic year.
- In addition to aiming to increase the full-time definition, earlier versions also sought to remove Pell eligibility for students enrolled less than half-time. The law does not include such provisions.
- The House version pushed to create a new campus-based program called the Promise Grant. The Senate did not include such a program in their version.
- Earlier versions included a "skin in the game" provision that introduced an institutional risk-sharing model for schools participating in the Direct Loan program. The law does not include such a model, but instead creates an accountability measure we review in more detail below.
- Under the House proposal, the bill would eliminate the 90/10 Rule entirely and throughout the Higher Education Act (HEA) it removed the phrase "gainful employment" from several definitions. While the Senate version does provide some regulatory relief, these cuts were not included in the final bill.

### **Changes Affecting Higher Education under OBBA**

- **Asset Exemption:**
  - The law reinstates prior asset exemptions of the family farm and small business assets from the SAI calculation and introduces an exemption of family-owned commercial fisheries. (Effective 7/1/26)
- **Federal Loan Changes:**
  - The law provides a cap to Parent PLUS loans annually at \$20,000 per dependent student and an aggregate limit of \$65,000 per dependent student. The law does not consider loans that have been forgiven, repaid, canceled or discharged. (Effective 7/1/26)



- The Graduate PLUS loan program has been eliminated. The Senate retained this House provision. The law does provide a legacy provision for current borrowers to complete their program of study. (Effective 7/1/26)
- A lifetime borrowing cap of \$257,500 is implemented on all federal student loans. This excludes the Parent PLUS loans. **Please note the slide in our webinar had a typo indicating this limit was \$275,000.** (Effective 7/1/26)
- In addition to the lifetime cap, the law also caps the annual graduate loan limits to \$20,500 graduate students/\$50,000 professional students. It also caps out the aggregate loan limits for each at \$100,000 graduate/\$200,000 professionals. (Effective 7/1/26)
- The changes to the annual, aggregate and lifetime loan limits include a legacy provision that allows current borrowers to borrow under existing limits for the remainder of their program to expected credential.
- The law allows institutions to enact their own institutionally determined loan limits on a program basis. (Effective 7/1/26)
- For students that are enrolled less than full time, the law requires schools to prorate annual loan limits in direct proportion to the percent of full time the student is attending.
- **Borrower Repayment Changes:**
  - The law introduces new Repayment Plan options for new borrowers. For borrowers with new loans made on or after July 1, 2026 there will be only two repayment plans.
    - NEW Standard Repayment plan: Fixed monthly payments and fixed terms ranging from 10-25 years based on the amount borrowed.
    - NEW Repayment Assistance Plan (RAP) that is an income-based repayment plan.
      - Monthly payments will be based on a borrower's AGI and number of dependents. For married borrowers who file their taxes separate from their spouse, income and dependents are calculated separately.
      - The law requires a minimum \$10 monthly payment.
      - Borrowers who don't have an Adjusted Gross Income (AGI) or whose AGI doesn't reflect the borrower's current income must provide the Department (ED) with documentation to calculate their monthly payment.
      - Borrowers under RAP are able to switch to the new Standard at a later date.
    - The law removes the requirement to demonstrate a financial hardship in order to enroll in an income based repayment plan (IBR).
      - Retains cancellation for balances of loans repaid under IBR at 25 years.
    - Current borrowers with no new loans made on or after July 1, 2026 will be eligible to continue to enroll in existing repayment programs, including the current Standard, Income Based Repayment (IBR), Graduated and Extended repayment plans. They will also be able to switch to the new RAP option.
      - Current borrowers under ICR, PAYE or SAVE must select a new plan by July 1, 2028 or if no selection is made they will automatically be put under RAP.
    - The law removes the requirement to demonstrate a financial hardship in order to enroll in an income based repayment plan.

- The law eliminates the Economic Hardship Deferment and Unemployment Deferment for borrowers who received a loan on or after July 1, 2027.
- **Pell Program Changes**
  - The law addresses the Pell Grant shortfall by adding \$10 billion in mandatory funding for the program for FY2026.
  - The law also establishes a Workforce Pell Grant program. This program provides Pell funds to short-term workforce training programs.
  - The law creates a provision excluding students who receive grants and scholarships covering their entire cost of attendance (COA) from being eligible for Pell grant funds, even if otherwise eligible for the program.
  - Pell eligibility is eliminated for students who have a high Student Aid Index (SAI), which is defined as exceeding twice the maximum Pell Grant award. (Effective 7/1/2026).
  - The law includes a provision requiring that foreign income be considered when calculating Pell Grant eligibility.
- **Accountability Measure**
  - The law establishes an accountability measurement, similar to the earnings threshold outlined in the Gainful Employment regulations. (Effective 7/1/2026)
    - Undergraduate programs will compare the median earnings of completers four years after program completion with “working adults,” which are defined as those with only an HSD or GED and not enrolled in higher education.
    - Graduate programs will compare median earnings four years post enrollment with earnings of “working adults,” which are defined as those with only a BA degree and are not enrolled in higher education.
    - Programs failing to meet this earning threshold in 2 of 3 years lose eligibility in Direct Loan program. There is an option to reapply for eligibility in the program after 2 years.
    - After one year of failure, the institution must provide disclosures to students
- **Regulatory Relief**
  - The law delays the implementation of the 2022 closed school discharge and borrower defense to repayment rules passed under the Biden administration. The rules would go into effect for loans that first originate before July 1, 2035.

On Friday, July 18<sup>th</sup>, a [Dear Colleague](#) was published focusing on the regulatory provisions made by the OBBBA that became effective upon enactment. The publication focused on the following six provisions:

- Changes to Income Based Repayment
- Parent PLUS Loan Repayment Options
- Loan limits for Part-time students
- Public Service Loan Forgiveness (PSLF)
- Borrower Defense to Repayment Regulations
- Closed School Discharge Regulations

The guidance within the DCL is summarized below:



### **Changes to Income Based Repayment:**

The OBBB eliminates the requirement that borrowers have a partial financial hardship to qualify for enrollment in an income-based repayment (IBR) plan authorized under section 493C of the HEA. A borrower is considered to have a partial financial hardship if the payment amount calculated under a standard 10-year repayment plan exceeds the amount calculated under the IBR plan. This change is effective upon enactment and the Department is currently working with its student loan servicers to remove the partial financial hardship eligibility requirement from the IBR enrollment process.

Because of this change, borrowers who have loans made on or after July 1, 2014 and before July 1, 2026, and did not qualify for partial financial hardship, are now eligible for the IBR plan. This IBR plan requires payments of 10 percent of discretionary income and has a repayment period of 20 years, with any remaining balance cancelled. In contrast, prior to this change, these borrowers only had access to the Income Contingent Repayment plan, which requires payments of 20 percent of discretionary income and loan cancellation after 25 years.

### **Parent PLUS Loan Repayment Options**

The OBBB allows borrowers with a consolidation loan that repaid a Parent PLUS Loan to enroll in an IBR plan effective upon enactment. The Secretary will provide additional information to its federal loan servicers and update the Studentaid.gov website when the system is available to enable such borrowers to enroll in IBR.

### **Loan Limits for Part-time Students**

The OBBB reduces the amount of a loan that a student may borrow for an academic year if the student is enrolled in a program of study on less than a full-time basis during that academic year. This reduction in the annual loan limit will be made in direct proportion to the degree to which the student is not enrolled full-time, rounded to the nearest percentage point.

The Department is currently developing the schedule of reductions that is required by the OBBB and will submit it for public comment later this year. Once public comments are received and reviewed, the revised schedule of reductions will be issued by the Secretary and used to determine the reduction in the annual loan limits for students who are enrolled less than full-time for subsequent academic years (2026-27 and beyond). Institutions will be required to use this schedule of reductions when reducing the annual loan limits for all students who are not enrolled full-time in those academic years.

### **Public Service Loan Forgiveness**

The OBBB amends the Public Service Loan Forgiveness (PSLF) program to allow for payments made under the newly created Repayment Assistance Plan (RAP) to count toward loan forgiveness, if all other eligibility criteria are met. RAP was created by the OBBB and will be in effect no later than July 1, 2026. This PSLF provision is effective upon enactment, meaning that whenever the Department launches the RAP program, borrowers will be able to immediately get credit for PSLF under RAP.

### **Borrower Defense to Repayment Regulations**

The OBBB delays implementation of the Biden Administration's Borrower Defense to Repayment regulations under 34 CFR Part 685, Subpart D. The previous Trump Administration's Borrower Defense to Repayment





regulations that were effective beginning July 1, 2020, will be effective as if the regulations were never amended during the Biden Administration for loans originated before July 1, 2035. The Biden Administration's regulations were not enforced prior to enactment of the OBBB because they are unlawful and were enjoined by a federal court. This provision is effective upon enactment and the Department will publish a Federal Register notice shortly that restores the regulations that were in effect on July 1, 2020.

### **Closed School Loan Discharge Regulations**

The OBBB delays implementation of the Biden Administration's Closed School Loan Discharge regulations under 34 CFR 674.33(g), 682.402(d), 685.214. The Closed School Discharge regulations that were effective July 1, 2020, will be effective as if the regulations were never amended. The regulations relating to those provisions will be effective for any loans originated prior to July 1, 2035. This provision is effective upon enactment and the Department plans to publish a Federal Register notice that restores the regulations that were in effect on July 1, 2020.

In a CECU webinar hosted alongside McClintock and Associates, presenters brought up the timeline discussion of these provisions being able to meet the November 1<sup>st</sup> final rule publication for the intended July 1, 2026 implementation. They shared there is a precedence where regulatory provisions included in signed law are subject to a waiver of the master calendar requirements and should be able to still implement for the intended deadline regardless if the committee can come to an agreement prior to November 1<sup>st</sup>.

Shortly after the publication of the DCL on last Friday, came the announcement from the Department of Education sharing its intention to name two new negotiated rulemaking committees to implement the recent statutory changes passed under the OBBBA. Their announcement indicates the committee will cover the following topics for discussion:

- Changes to the federal student loan programs
- Changes to institutional and programmatic accountability, the Pell Grant program and other changes to the Title IV, HEA programs.
  - This includes addressing the accountability measure included in OBBBA, which outlines the loss of Direct Loan eligibility for programs with low earning outcomes for two out of the three years. The language also would include the Financial Value Transparency regulations and Gainful Employment accountability measure for GE programs.
  - Provide guidance on the eligibility requirements for programs to participate in the new Workforce Pell Grant. The bill specifies these programs:
    - Last 8-15 weeks
    - Transfer to a recognized postsecondary credential or degree
    - Are approved by the state governor and
    - Meet 70 % job placement and completion rates
    - Have strong earning outcomes

The Department held a public negotiated rulemaking hearing last week on August 7, 2025, from 9 am to 4 pm to seek comments on the topics mentioned above. As the industry is experiencing many regulatory changes and dynamic shifts to current policies, we encourage all institutions to attend the final Wednesday Webinar Summe



July/August 2025

Series hosted by FSA which is the Federal Update. The webinar will be on Wednesday, September 10<sup>th</sup> from 1-3pm ET. The link for the town hall style session is [here](#).

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## **FVT/GE REPORTING REMINDER FOR THE 23/24 AND 24/25 AWARD YEARS**

On July 9th, ED provided an Electronic Announcement reminding institutions of the reporting requirement under the FVT/GE regulations. The deadline for the 2024 reporting cycle (23/24 award year reporting) was pushed back to September 30, 2025. On this date, schools must submit their program and student submissions, as well as confirm the accuracy of their draft completer list. The deadline for the 2025 reporting cycle (24/25 award year reporting) is October 1, 2025. Institutions must submit their program and student submissions by this deadline. The draft completer list for the 2025 reporting cycle has not yet been published. The EA explains it will be published after the receipt of the 2024 version. Once received, schools will have 60 days to review before the final list is published.

To assist with the FVT/GE reporting, the EA reminds schools of the availability of the Financial Value Transparency and Gainful Employment Reports (FVT/GE) on the NSLDS Professional Access site. To draw down these reports, please reference the [Dear Colleague](#) on where you can find FSA's training webinar on the FSA Training site.

As a reminder there are three methods in which your school can submit your program/student submissions.

- FVT/GE Batch Submittal: reporting through the SAIG Mailbox using CSV or fixed width formatting
- FVT/GE Online: Access the NSLDSFAP website. Users must have an active NSLDS User ID and be signed up for Enrollment Update for NLSDS online services.
  - Students and programs are submitted one by one using this method.
- FV/GE Spreadsheet Submittal: Also through the NSLDSFAP website, navigate to the school tab, then to the spreadsheet submittal page. From there go to the FVT/GE Spreadsheet submittal page to make submission. You must use the templates provided on the site for this submission pathway.

If the last reporting cycle taught us anything it was to ensure we leave plenty of time to address system issues and error response files. Our biggest recommendation is to start the reporting process early to allow plenty of time to gain a final acceptance before the October 1<sup>st</sup> deadline. We recommend visiting the [FSA Topics page for Financial Value Transparency and Gainful Employment](#). This site has all resources published by FSA on this regulation, as well as a quick link to the [NSLDS FVT/GE User Guide](#) to assist in the reporting process.

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## **VERIFICATION OF IDENTITY REPORTING SOON AVAILABLE IN FAFSA PARTNER PORTAL**

In an [Electronic Announcement](#) released August 12th, FSA provided an update on the availability of verification of identity reporting in the FAFSA Partner Portal. Reporting functionality will be available in the FAFSA Partner



Portal for the 2025–26 award year by **Aug. 31, 2025**. Reporting functionality for the 2026–27 award year will be available at the start of the processing cycle. Perhaps the biggest update is the waiver of the requirement to report verification of identity for the 24/25 award year.

Last month we shared the Department’s directed focus on preventing fraud through Identity Verification. Through their efforts, institutions have seen an uptick in students selected for V4 and V5 verification over these summer months. A reminder the [EA](#) indicates this fall FSA is to establish a new process which implements an additional screening process for each FAFSA applicant. FSA indicates the goal is to use this new process to identify fraudulent identities at a level of confidence that allows for the reduction of V4 verification rates to near zero in the future. However, for this fall season, they do anticipate V4 rates will still be higher than what schools anticipated in the 24/25 academic year.

To assist in the higher than normal verification selection, FSA also released the [25/26 FAFSA Verification Internal Revenue Service \(IRS\) Tax Return Transcript Matrix](#). Since the IRS Tax Return Transcript does not have line or item numbers and uses wording that may be different from what is used on the FAFSA form, this matrix may help financial aid administrators map 2023 IRS Tax Return Transcript information to FAFSA/ISIR data. For more information on how to utilize the matrix, you can read the August 12<sup>th</sup> EA [here](#).

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## **IN THE NEWS: PRESIDENT TRUMP ISSUES EXECUTIVE ORDER TO ENSURE TRANSPARENCY IN HIGHER EDUCATION**

On August 7<sup>th</sup>, President Trump issued his most recent [Executive Order](#), *Ensuring Transparency in Higher Education Admissions*. The order mandates high education institutions submit data regarding their admission practices to verify they are not race-based. As this administration has been focused on eliminating Diversity, Equity and Inclusion (DEI) initiatives, the order cites its intent is to provide great transparency of potential “unlawful practices...and dangerous racial hierarchies”.

The Integrated Postsecondary Education Data System (IPEDS) is the system responsible for maintaining education statistics and as such would be tasked with collecting this new data requirement. Trump calls for an overhaul of IPEDS, indicating there are technological upgrades needed to fulfill their current and future mission of providing transparent data on educational institutions. For those in the financial aid space, IPEDS is a familiar system and frequent reporting is a long held requirement.

To accomplish the goals within the Executive Order, the Secretary of Education will consult with applicable departments and agencies to develop a plan for restructuring and modernizing the IPEDS site, allowing for greater transparency and easier accessibility. The biggest piece of the order to take note of is the forthcoming enhanced reporting requirement scheduled to take effect within 120 days of the August 7<sup>th</sup> order. The scope of regular reporting will expand to include reporting on race-based admission practices. Additionally, the order indicates they will also “increase” accuracy checks of data to ensure accuracy and take action if institutions fail to submit data in a timely manner or submit materially incomplete information.





## IMPORTANT: UPCOMING DEADLINES

The end of summer and beginning of fall is always a busy time in the higher education industry. Please be aware of important deadlines that are upcoming over the next several months.

- August 20<sup>th</sup>- Campus- Based Reallocation Form Due
- September 13<sup>th</sup>- Deadline to complete 24/25 ISIR corrections to FPS
  - Be sure to complete outstanding verification for 24/25 students as this will be the last date to update the ISIR to reflect accurate data after verification.
- September 30<sup>th</sup>- Deadline to submit all Pell/Teach Grant disbursements to COD for the 24/25 award year
- September 30<sup>th</sup>- Deadline to submit 23/24 FVT/GE Reporting and Completer's Lists
- September 30<sup>th</sup>- Release of the Official Cohort Default Rate
- October 1<sup>st</sup>- Deadline to submit 24/25 FVT/GE Reporting
- October 1<sup>st</sup>- Annual Campus Security Report due
- October 1<sup>st</sup>- 26/27 Fiscal Operations Report and Application to Participate (FISAP) due
- October 15<sup>th</sup>: Fall IPEDS Due

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## COMPLIANCE CORNER

### CAMPUS CRIME REPORTING

As indicated above, October 1<sup>st</sup> is the deadline to submit your institution's Annual Security Report and crime statistics to the Department of Education. In this edition of our *Compliance Corner*, we will review the reason for the regulation, as well as the reporting requirements outlined within.

Over thirty years ago, the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (Clery Act for short- 20 U.S.C. 1092) was originally enacted as Title II of the Student Right-to-Know and Campus Security Act of 1990 (P.L. 101-542). It was signed into federal law as an amendment to the Higher Education Act of 1965. The act came at the heels of a student's murder in 1986- Jeanne Clery. The Clery Act was passed to increase the accountability and transparency of Institutions of Higher Education (IHEs) in meeting certain responsibilities regarding the safety and security of students on their campuses. It required IHEs participating in HEA Title IV financial assistance programs to disclose campus crime statistics and security information

Shortly after the passing of the Clery Act, came the Violence Against Women Act, (VAWA) U.S. federal legislation expanded the juridical tools to combat violence against women and provide protection to women who had suffered violent abuses. It was initially signed into law in September 1994 by Pres. Bill Clinton. Besides changing statutes, VAWA was notable for calling attention to the issues of domestic violence, dating violence, sexual abuse and assault, and stalking. In 2000, 2005, 2013 and most recently in 2022, Congress amended the Clery Act



through the reauthorization of the Violence Against Women Reauthorization Act as the previous statutes were planned to expire.

The Clery Act requires all schools that participate in the Title IV programs maintain the following regulatory requirements:

- Maintain a log that records details about crime that occur within the schools' "Clery geography";
- Submit statistics about these crimes to the Department annually; and
- Create an annual security report that contains those statistics as well as relevant policies and other information and distribute that report to students and employees (See VAWA Amendment on next slide).
  - Schools that have an on-campus student housing must also maintain a log that records details of fires that occur in the housing, submit statistics about the fires to the Department annually, and create an annual fire safety report containing the statistics and other relevant information and distribute the report to students and employees.

Once the VAWA amendment was added to the Clery act, additional requirements were made to institutions that included disclosing certain criminal statistics:

- Dating Violence
- Domestic Violence
- Sexual Assault
- Stalking

Additionally, VAWA provided schools must include certain policies, procedures and educational programs pertaining the crimes listed above in their annual security reports.

**Designate a Campus Security Authority:** In order to meet the expectations within this regulation, your school must designate an individual or office to coordinate and oversee your campus security. This individual will serve as a point of contact to which students and employees are directed to report criminal offenses. Your annual security report should list the designation of this Campus Security Authority.

**Collect Crime Statistics/Initiate Timely Warnings and Emergency Notification(s):** A school must report to the Department and disclose in its annual security report statistics for the three most recent calendar years the number of each of the following crimes that occurred on or within its Clery geography AND that are reported to local police agencies or to a campus security authority:

1. Primary Crimes
2. Arrests and Referrals for disciplinary action
3. Hate Crimes
4. Dating Violence, Domestic Violence and Stalking

Crimes must be reported by calendar year and by location (on campus, in or on a non-campus building or property or on public property). In reporting crime statistics, the institution must not disclose Personally Identifiable Information about the victim. In addition to the requirement to maintain and report crime statistics, the regulations also require Title IV institutions to provide a timely warning to the campus community on crimes included in your crime statistics, reported to local police agencies or your CSA and may be considered by the school to represent a

threat to students and employees. The intention of the regulation is to aid in the prevention of similar crimes. Your institution must also include in your annual security report a policy statement outlining your timely warning procedures. While a timely warning is issued after a crime has been reported, conversely a school is also required to provide an emergency notification to the campus community if there is an immediate threat to the health and safety of its students or employees. A school that follows its emergency notification procedures is not required to issue a timely warning based on the same circumstances; however, the school must provide adequate follow-up information to the community as needed.

**Annual Security Report Requirements:** As stated above, a major requirement of the Clery Act is to disclose policy statements in your annual security report. Your institution's policy statements must reflect your institution's unique security policies, procedures and practices. Additionally, the annual security report must include the crime statistics that have been reported, collected and submitted by your institution.

The statements indicated below are required to be included in your annual security report:

- A statement of current campus policies regarding procedures for students and others to report criminal actions or other emergencies occurring on campus. This statement must include the institution's policies concerning its response to these reports, including—
  - Policies for making timely warning reports to members of the campus community regarding the occurrence of crimes described in this chapter;
  - Policies for preparing the annual disclosure of crime statistics;
  - A list of the titles of each person or organization to whom students and employees should report criminal offenses for the purpose of making timely warning reports and the annual statistical disclosure; (See the slide on CSA); and
  - The policies or procedures that allow victims or witnesses to report crimes on a voluntary, confidential basis for inclusion in the annual disclosure of crime statistics
- A statement of current policies concerning security of and access to campus facilities, including campus residences, and security considerations used in the maintenance of campus facilities
- A statement of current policies concerning campus law enforcement that—
  - Addresses the enforcement authority of security personnel, including their relationship with state and local police agencies, whether those security personnel have the authority to arrest individuals, and any agreements, such as written memoranda of understanding between the institution and such agencies, for the investigation of alleged criminal offenses;
  - Encourages accurate and prompt reporting of all crimes to the campus police and the appropriate police agencies when the victim of a crime elects or is unable to make such a report; and
  - Describes procedures, if any, that encourage pastoral counselors and professional counselors, when they deem it appropriate, to inform the persons they are counseling of any procedures to report crimes on a voluntary, confidential basis for inclusion in the annual disclosure of crime statistics
- A description of the type and frequency of programs designed to inform students and employees about campus security procedures and practices and to encourage students and employees to be responsible for their own security and the security of others
- A description of programs designed to inform students and employees about the prevention of crimes.



- A statement of policy concerning the monitoring and recording through local police agencies of criminal activity by students at off-campus locations of student organizations officially recognized by the institution, including student organizations with off-campus housing facilities.
- A statement of policy regarding the possession, use, and sale of alcoholic beverages and enforcement of state underage drinking laws
- A statement of policy regarding the possession, use, and sale of illegal drugs and enforcement of federal and state drug laws.
- A description of any drug or alcohol abuse education programs
- A statement advising the campus community where law enforcement agency information concerning registered sex offenders may be obtained, such as
  - the law enforcement office of the institution,
  - a local law enforcement agency with jurisdiction for the campus,
  - or a computer network address.
- A description of the school's emergency response and evacuation procedures
- A policy statement about the institution's programs to prevent dating violence, domestic violence, sexual assault, and stalking and school procedures for reporting. The statement must include
  - Educational programs and campaigns to promote the awareness of dating violence, domestic violence, sexual assault, and stalking;
  - Procedures victims should follow if a crime of dating violence, domestic violence, sexual assault, or stalking has occurred, including written information about
    - Importance of Preserving Evidence
  - How and to whom the alleged offense should be reported
  - Options about the involvement of law enforcement and campus authorities
  - Where applicable, the rights of victims and the institution's responsibilities for orders of protection, "no-contact" orders, restraining orders, or similar lawful orders
- Information about how the institution will protect the confidentiality of victims and others, including how it will
  - Complete publicly available recordkeeping, including Clery Act reporting and disclosures, without using identifying information about the victim; and
  - Keep confidential any protective measures for the victim, as long as that confidentiality would not impair the institution's ability to provide those measures.
- A statement that the institution will provide written notification to students and employees about existing counseling, health, mental health, victim advocacy, legal assistance, visa and immigration assistance, student financial aid, and other services available for victims, both within the institution and in the community
- A statement that the institution will provide written notification to victims about options for academic, living, transportation, and working situations or protective measures. The institution must make such accommodations if the victim requests them and they are reasonably available, regardless of whether he chooses to report the crime to campus police or local law enforcement;
- An explanation of the procedures for institutional disciplinary action in cases of these alleged crimes, and

- A statement that when students or employees report to the school that they have been a victim of dating violence, domestic violence, sexual assault, or stalking, the school will provide them a written explanation of their rights and options

### **Distributing and Disclosure of the Annual Security Report**

Distribution: By October 1 of each year, a school must distribute to all enrolled students and current employees its annual security and fire safety reports through appropriate publications and mailings including:

- direct mailing to each individual through the U.S. Postal Service, campus mail, or electronic mail;
- a publication or publications provided directly to each individual; or
- posting on an Internet or intranet website (see the conditions for Web distribution at the beginning of this chapter

Disclosure Notice: For each of the reports, the school must provide a notice to prospective students and prospective employees that includes a statement of the report's availability, a description of its contents, and an opportunity to request a copy. A school must provide its annual security report and annual fire safety report, upon request, to a prospective student or prospective employee.

If the school chooses to provide either its annual security report or annual fire safety report to prospective students and prospective employees by posting the disclosure on an Internet website, the school must follow the procedures for Web dissemination described earlier.

Source: [FSA Handbook Volume 2, Chapter 6](#) and [34 CFR 668.41](#)

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## **CALENDAR and RESOURCES**

### **Training Resources**

#### **DJA MONTHLY WEBINARS**

*Cash Management- Wednesday, September 3, 11 a.m. CST*

**NOTE:** There may be a difference between DJA local time and your time zone. To determine your time zone equivalent, click on this link to view a time zone map: <http://www.worldtimezone.com/time-usa12.php>

Webinars are free to clients, as well as our newsletter recipients on a trial basis. Invitations are automatically sent to all clients, however if you do not receive an invitation, email Lynessa Roberts at [lroberts@gotodja.com](mailto:lroberts@gotodja.com). After registering, you will receive the log-in information. If you would like to attend a webinar and are not a DJA client, please email Lynessa and she will ensure you receive an invitation to register. Questions can be directed to Lynessa by email or by calling toll free at 1-800-242-0977.





July/August 2025

## 2025 DJA WEBINAR SCHEDULE

SEPT 3	Cash Management
OCT 8	Enrollment Reporting Using NSLDS
NOV 5	Program Integrity (Audits, Program Review)
DEC 3	1098-T Reporting

## 2025 TITLE IV DATES TO REMEMBER

We know how complex the compliance requirements can be for schools participating in the Title IV programs, as can keeping up with all the reporting deadlines year to year. To assist our clients and other institutional partners, we have developed a quick reference calendar reviewing the important deadlines for the year 2025. For a printed color copy, visit us at any of our upcoming [exhibitor events](#) or to print your own copy, click [here](#).

## Upcoming Conference Schedule

### *NACCAS Quarterly Workshop September 6-8th*

NACCAS is hosting their third quarter Workshop in Las Vegas, NV at the Horseshoe Hotel, with pre-candidate training on Saturday September 6<sup>th</sup> and workshop sessions the following Sunday and Monday. DJA will be available as an exhibiting partner. We invite you to stop by our booth for a yearly calendar of Title IV deadlines, a copy of our most recent newsletter and a notebook and pen to utilize throughout your training. We would love to visit with you on how partnering with DJA can be a great addition to ensuring compliance with Title IV financial aid administration.

### *CSPEN 11<sup>TH</sup> Annual Conference*

The Career Schools Private Education Network (CSPEN) is hosting its 11<sup>th</sup> annual conference September 8<sup>th</sup>-11<sup>th</sup> in Myrtle Beach, SC at the Marriot Myrtle Beach Resort and Spa Grand Dunnes. This event features speakers presenting on timely and relevant topics, while also providing an environment to connect and network with others in the sector. Our Vice President, Renee Ford will be at our booth to showcase the advantages a partnership with our company can offer to ensure your institution maintains regulatory compliance through our streamlined, cost-savings approach. Visit us to discuss how our services can best meet your financial aid administration needs.

**For a complete listing of where to find DJA at upcoming industry conventions and conferences, visit our exhibiting calendar at our website [here](#).**

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*Disclaimer: The information presented in this Newsletter is provided as a service and represents our best efforts to assist institutions with federal student aid regulations. We have collected information we believe to be important in finding and obtaining the resources for administering federal student aid; however, we assume no liability for the use of this information. The information in this newsletter does not constitute, and should not be construed as, legal advice.*

