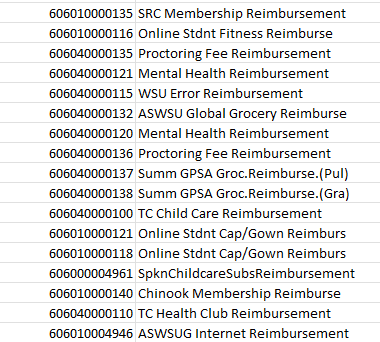
Policies & Procedures for SFS to Account for Other Student Reimbursements and Payments Not disbursed through Student Financial Services

**Outside & Departmental Third Party Guarantees Processed by Bursar’s Office**:

1. The Bursar’s Office submits a daily spreadsheet of TPG’s posted on the Student Finances end to SFS, emailed to the Senior Advisor in the scholarships area (Kati Vandermark). If Kati is out her supervisor, Assistant Director, Tara Sandoval will relay to Bursar’s contact (Logan Spencer), to email information to her.
2. These spreadsheets are uploaded to the TPG folder on the SFS Sharepoint site.
3. SFS accounts for the funds using a placeholder item type and assumes the same funding for spring.
4. SFS processor releases the SNR
5. SFS adds a comment and sends a communication through myWSU 3C’s process.

**Departmental Reimbursement Uploads to Student Financials**

1. The series of student reimbursements (see below) uploaded by departments are not managed by Bursar’s Office.



1. When such a reimbursement is posted to a student’s account, a batch process set up process scheduler will run each evening to set a Service Indicator of SNR\_REIMB.
2. The process to set the indicator will occur before the refund process kicks off. The SNR is set to release in 5 business days.
3. An automated email is sent daily to key SFS & Bursar staff members with an attached query to all SNR holds, see example below:

A screenshot of a computer

Description automatically generated

1. The SFS team member assigned to process the SNR\_REIMB for each campus will open the spreadsheet and filter by campus and SRVC Reason to REIMB.
2. The processor will need to check the students account to identify the description of the reimbursement.
3. The processor will account for the reimbursement/payment using “Other Resource Placeholder” item type. Depending on the type of reimbursement the processor may assume student will receive same payment for spring and post for spring as well.
4. If this is the case, use FA\_FPL communication as this informs the student SFS is estimating the same amount for spring, and explaining this is not a guarantee of receipt of funds in anyway.
5. For these reimbursements, the standard process would be just to account for the term awarded and if needed, adjust any aid if not allowable to account for in the COA.
6. Add a comment FA\_COU and note the reimbursement description.
7. Add a FA\_FF6 communication and add a message of “SFS has accounted for the payment you received on your student account as a placeholder as this is considered a resource per financial aid rules”. If an adjustment was needed to the students account, include what was adjusted.
8. Release the SNR.

I**nstitutional Reimbursements/Payments to students Not processed through myWSU or Workday**

1. To Report a student reimbursement or a list of student reimbursements, the department will submit through Student Reimbursements Not accounted for in myWSU/Workday [form](https://app.smartsheet.com/b/form/34dcf0251c9249448bbd535fa56208b8)
2. This is a Smartsheet form where these submissions are recorded on a sheet.
3. There is logic set up in the sheet so that based on campus, the liaison on that campus will receive notice of a submission. If any campus needs assistance with posting reimbursements, Pullman contacts can assist. Campus designees are the following:
   1. Pullman – Tara Sandoval and Kati Vandermark
   2. Vancouver – Natalie Marquez
   3. Global – Jordyn Creighton
   4. Tri-Cities- Jana Kay Lunstad
   5. Spokane – Melissa Carolus
   6. Everett – Tara Sandoval & Kati Vandermark
4. The processor will review the reimbursement and in myWSU account for the funds using the Other Resource Placeholder item type.
5. Add a comment FA\_COU and note the reimbursement description.
6. Add a FA\_FF6 communication and add a message of “SFS has accounted for the payment you received on your student account as a placeholder as this is considered a resource per financial aid rules”. If an adjustment was needed to the students account, include what was adjusted.

Note that there will not be an SNR service indicator set for these as these would be funds student received directly. Most common example will be a gift card or Food Vouchers.

**Accounting for Graduate Fee Waivers**

1. When Graduate Fee waivers are uploaded to Student Accounts an SNR service indicator is placed on the student’s account through an automated process.
2. SFS receives an email notification with attached query, see example below

A screenshot of a computer

Description automatically generated

1. The SFS processor will review the students financial aid account and if placeholder is not already posted, will add and adjust add as needed.
2. The SNR will then be released.

**Accounting for Veterans Administration Guarantees**

Veterans, dependents of veterans, and dependents of Law Enforcement Officers and Fire Fighters who receive funding from the VA need to have it accounted for in their financial aid package. Some receive full tuition, mandatory fees, and course fees, where others will receive a percentage of the tuition and fees. SFS uses a placeholder, titled Vet Fee Waiver Placeholder, to account for the funding and bursars’ office will post the actual funds directly to the student’s account.

Procedures to account for these funds can be found at [P & P Veteran Waivers.docx (sharepoint.com)](https://emailwsu.sharepoint.com/:w:/r/sites/EM/SFS/_layouts/15/Doc.aspx?sourcedoc=%7BE34EF4B5-E1E5-470D-A6E7-52C862D0ABA0%7D&file=P%20&%20P%20Veteran%20Waivers.docx=&wdOrigin=TEAMS-MAGLEV.p2p_ns.rwc&action=default&mobileredirect=true)

**Student Reimbursements/Payments processed through Workday**

SFS is working with the Mod Team to have the ability to run specific reports to identify student reimbursements and payments.

The Mod Team is working on a report for SFS to access to identify students receiving Non Service Pay Authorizations

**NASFAA Ask NASFAA Regs Reference Information:**

**Is an Award In the Form Of a Taxable Stipend or Voucher Considered Other Financial Assistance?**

Award Year: 2024-25KA-36732Helpfulness Rating      *236 page views*

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This guidance is specific to the 2024-25 award year and later. For 2023-24\* award year guidance see AskRegs Q&A, [Is an Award In the Form Of a Taxable Stipend or Voucher Considered Estimated Financial Assistance?](https://askregs.nasfaa.org/article/34072/is-an-award-in-the-form-of-a-taxable-stipend-or-voucher-considered-estimated-financial-assistance)

Yes. These funds should be included as other financial assistance (OFA). Calling it a taxable stipend or voucher does not automatically exclude the award from OFA. Consider the following:  
  
1) An award that is contingent upon the student’s enrollment is generally treated as financial aid, since it is probably going towards educational expenses.  
  
Please see the definition of other financial assistance in [34 CFR 685.102(b)](https://www.nasfaa.org/Part_685_Federal_Direct_Loan_Program#suba685102b), specifically, clause (1)(iii), which states: (1) The estimated amount of assistance for a period of enrollment that a student (or a parent on behalf of a student) will receive from Federal, State, institutional, or other sources, such as scholarships, grants, net earnings from need-based employment, or loans, including but not limited to- ... (iii) Any educational benefits paid because of enrollment in a postsecondary education institution, or to cover postsecondary education expenses; The assumption for this part of the definition is that the student would not be receiving the assistance if he or she was not enrolled at a postsecondary institution. [685.102(b)]  
  
2) When looking at a source of funding as income, the school must determine whether the employment is need-based or non-need based.  
  
The Federal Methodology, used to establish need for the Title IV programs, does not have to be used to determine a student’s need for non-Title IV employment. If any system of need determination is used, the employment is need-based. Need-based employment is always treated as financial aid when packaged with other Title IV aid. Non-need-based employment is never treated as financial aid; rather, it is treated as income in the calculation of the student aid index (SAI).

An award that is contingent upon the student’s enrollment is generally treated as financial aid, since it is probably going towards educational expenses.

**Note**: Even though the regulatory references provide above specify estimated financial assistance (EFA), starting with the 2024-25 award year under the [FAFSA Simplification Act](https://docs.house.gov/billsthisweek/20201221/BILLS-116HR133SA-RCP-116-68.pdf), EFA becomes other financial assistance (OFA).

**Is Institutional Aid Considered Other Financial Assistance?**

Award Year: 2024-25KA-36733Helpfulness Rating      *459 page views*

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This guidance is specific to the 2024-25 award year and later.

**Scenario:** Our awarding policy is that we award federal aid first, state aid next, outside sources, then institutional aid last. We have a student with a cost of attendance (COA) of $47,740. His student aid index (SAI) is $45,714. The need is $2,026. At the time of admission, the student was awarded a $10,000 institutional merit scholarship. Total aid equals $12,026.  
  
**Answer:**Yes, institutional aid must be included as other financial assistance (OFA) when packaging the student with Direct Subsidized Loans and campus-based aid. In this scenario, the student is not eligible for a Direct Subsidized Loan, only a Direct Unsubsidized Loan in the amount of $2,026.  
  
Under [34 CFR 685.102(b)](http://www.nasfaa.org/Part_685_Federal_Direct_Loan_Program#suba685102), the definition of OFA includes:  
  
"(1) The estimated amount of assistance for a period of enrollment that a student (or a parent on behalf of a student) will receive from Federal, State, institutional, or other sources, such as scholarships, grants, net earnings from need-based employment, or loans, including but not limited to-  
(i) Except as provided in paragraph (2)(iii) of this definition, national service education awards or post-service benefits under title I of the National and Community Service Act of 1990 (AmeriCorps).  
(ii) Except as provided in paragraph (2)(vii) of this definition, veterans' educational benefits;  
(iii) Any educational benefits paid because of enrollment in a postsecondary education institution, or to cover postsecondary education expenses;  
(iv) Fellowships or assistantships, except non-need-based employment portions of such awards;  
(v) Insurance programs for the student's education; and  
(vi) The estimated amount of other Federal student financial aid, including but not limited to a Federal Pell Grant, Academic Competitiveness Grant, National SMART Grant, campus-based aid, and the gross amount (including fees) of subsidized and unsubsidized Federal Stafford Loans or subsidized and unsubsidized Direct Stafford Loans and Federal PLUS or Direct PLUS Loans."

**Are Non-Cash Gifts Considered Other Financial Assistance?**

Award Year: 2024-25KA-36723Helpfulness Rating      *414 page views*

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This guidance is specific to the 2024-25 award year and later.

It is NASFAA's understanding that the other financial assistance (OFA) rules under [34 CFR 685.102(b)](https://www.nasfaa.org/Part_685_Federal_Direct_Loan_Program#suba685102) and [673.5(c) *Estimated financial assistance*](https://www.nasfaa.org/part_673_campus-based_common_provisions#subb6735) are no different for gifts that are not in the form of money or gift cards. If the gift is due to postsecondary enrollment and your school tracks the receipt of such items on a per-student basis, then the value for such items must be included as OFA when packaging the student. This includes, but is in **no way limited to** items such as:

* T-shirts;
* Water bottles;
* Gift cards;
* Food coupons; and
* Other such items and gifts.

Reference the following AskRegs Q&A: [Is There a De Minimis Amount That Is Allowable Without Having To Count a Resource As Other Financial Assistance? (Award Year: 2024-25)](https://askregs.nasfaa.org/article/36714/is-there-a-de-minimis-amount-that-is-allowable-without-having-to-count-a-resource-as-other-financial-assistance)

**Note About Tracking:**If your school does not track the receipt of such items on a per-student basis, there is no way to attribute that OFA to a specific student. For example, if your athletic department uses a "t-shirt gun" to give away t-shirts during half time of a football or basketball game and does not track who receives the t-shirts, there is no requirement to track those items and they would not be OFA. Whether your school tracks these items is entirely up to the school. NASFAA cannot recommend either way.

**Are Gift Cards In Any Amount Considered Other Financial Assistance (OFA)?**

Award Year: 2024-25KA-36720Helpfulness Rating      *590 page views*

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This guidance is specific to the 2024-25 award year and later.

Yes. Under [34 CFR 673.5](https://www.nasfaa.org/part_673_campus-based_common_provisions#subb6735) and [685.102(b)](https://www.nasfaa.org/Part_685_Federal_Direct_Loan_Program#suba685102b), any funds a student receives as a result of being enrolled in postsecondary education are considered estimated financial assistance (OFA) and must be counted as OFA when packaging the student. There is no de minimis or minimum amount that would not have to be counted--any amount is OFA. As noted in the regulations, exceptions exist for non-need-based loans used to replace the SAI, non-need-based employment, TEACH Grants, etc.

[668.16(b)(3)](https://www.nasfaa.org/Part_668_General_Provisions#subb66816b) of the administrative capability regulations requires all campus offices to report to the financial aid office any information which may have bearing on a student's receipt of Title IV federal student aid.

Reference "Estimated Financial Assistance (EFA)" in Volume 3, Chapter 3 of the *FSA Handbook*.

**Are Institutional Monetary Awards Or Bonuses Considered Other Financial Assistance?**

Award Year: 2024-25KA-36617Helpfulness Rating      *117 page views*

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This guidance is specific to the 2024-25 award year and later.

**Scenario:** We are developing a new awards program to recognize staff and students for their contributions. For students with financial aid awards who might receive a monetary award from this program, we are trying to determine if we need to count it in their financial aid award package. Also, we are also trying to determine if a student employee (not work-study) were to receive a monetary bonus for an innovative idea while they were working on the job, that this be handled like salary or because the student is a student or if we would have to run through the financial aid office and be treated like a resource in the student's package. We also want to know if it would make any difference if the student was a work-study student.  
  
**Answer**: If the award is contingent upon the recipient's student status and it is disbursed as a financial aid award through your financial aid management system to the student's tuition and fee account, you would need to count it as other financial assistance (OFA) when packaging. If it is awarded through your standard payroll system, it would be counted as part of the recipient's earnings and not be counted as OFA.

**Are Institutional Short-Term Or Emergency Loans Considered Other Financial Assistance?**

Award Year: 2024-25 KA-36618 Helpfulness Rating 133 page views

This guidance is specific to the 2024-25 award year and later.

Scenario: Our institution is looking at creating an emergency loan program for students. The funds will be institutional funds, and the application and decision will be made from our Student Affairs Office. The funds are required to be repaid by the end of the term of enrollment or a hold will be placed on the student's academic record, prohibiting future enrollment until the loan is paid.  
  
Answer: According to guidance from the U.S. Department of Education (ED), short-term or emergency loans of this nature made by the school are not considered other financial assistance (OFA) when packaging the student. Only long-term loans made by the school would be considered OFA. ED does not define short-term loans, but it is NASFAA's understanding that a short-term or emergency loan in this context is one which requires repayment by the end of the current period of enrollment (academic or award year) or payment period (term or nonterm period). Long-term loans would extend beyond that and be similar in nature to Direct Loans or Federal Perkins Loans.

**Are Post-Enrollment Or Graduation Awards Or Prizes Considered Other Financial Assistance?**

Award Year: 2024-25KA-36735Helpfulness Rating      *293 page views*

 Add To Favorites

This guidance is specific to the 2024-25 award year and later.

Yes, according to guidance NASFAA has received from the U.S. Department of Education (ED), post-enrollment or graduation awards are considered other financial assistance (OFA). These include retention grants, scholarships, loans, etc. given between academic years and awards or prizes given after graduation.

Both [34 CFR 673.5(c)](https://www.nasfaa.org/part_673_campus-based_common_provisions#subb6735) and [685.102(b)](https://www.nasfaa.org/Part_685_Federal_Direct_Loan_Program#suba685102) specify the definition of OFA as the estimated amount of assistance for a period of enrollment that a student (or a parent on behalf of a student) will receive from federal, state, institutional, or other sources, such as scholarships, grants, net earnings from need-based employment, or loans, including but not limited to, among other things, any educational benefits paid because of enrollment in a postsecondary education institution, or to cover postsecondary education expenses. Since the award is paid because of postsecondary enrollment, it must be included as OFA and Title IV aid adjustments would need to occur to reduce any overaward. Information regarding the treatment of overawards can be found in the Volume 4 of the *FSA Handbook*.

NASFAA has confirmed with ED that, if the school was aware of the reasonable possibility of such an award or benefit, it is OFA and should have been included in the student's financial aid package for the recently concluded period of enrollment. This is true even if the funds are actually awarded retroactively. There is, however, a slight difference when it comes to the source of the award and whether the school truly did not know about even the possibility of the award.

**If the award is an outside scholarship, grant, loan, etc.**, and the school had no legitimate or reasonable way of knowing the student would be receiving the award after enrollment, graduation, or withdrawal from the institution, it is still technically OFA, but the school is not required to repackage or adjust the student’s Title IV aid to account for it. If the school genuinely was not aware of an award, and it was delivered after the student’s withdrawal, but the student re-enrolls for the upcoming period of enrollment, it is OFA for the upcoming period of enrollment. The upcoming award year’s aid is adjusted to account for the funds received after the previous period of enrollment ended. This latitude does not apply to institutional aid, scholarships, grants, etc. (such as Alston Athletic Awards or retention scholarships) from the school itself or related third-parties.

**If the award is from the school itself, or if the school has any say in how that award is set up**, ED does not accept the argument that they cannot be awarded until after a period of enrollment is ended or until graduation. According to ED, there is every expectation that the school is reasonably aware of who will receive such awards and in what amounts. Additionally, if the school has a degree of latitude with the award and does not have to wait until after enrollment or graduation to make the award, then it should not wait until after enrollment or graduation to make the award. Of course, when the award is actually posted is a matter of institutional prerogative, but it must be counted as OFA in the period of enrollment for which it is intended.

ED’s stated goal is to be reasonable while taking a clear and firm position on what is OFA. ED also do not want to create a situation whereby one could easily circumvent the rules by just waiting to make the awards.

**Note**: Even though the regulatory references provide above specify estimated financial assistance (EFA), starting with the 2024-25 award year under the [FAFSA Simplification Act](https://docs.house.gov/billsthisweek/20201221/BILLS-116HR133SA-RCP-116-68.pdf), EFA becomes other financial assistance (OFA).

**Is a Fellowship Or Assistantship Considered Other Financial Assistance If It Is Awarded For a Period Of Nonattendance?**

Award Year: 2024-25KA-36717Helpfulness Rating      *359 page views*

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This guidance is specific to the 2024-25 award year and later.

**Answer:**Yes, except for any non-need-based employment portion of the fellowship (or assistantship or internship), the award is considered other financial assistance (OFA) even if it is received for a period of nonattendance, such as a summer period. According to guidance NASFAA has received from the U.S. Department of Education (ED), under[Section 471 of the Higher Education Act of 1965 (HEA), as amended, [20 USC 1087kk]](https://uscode.house.gov/view.xhtml?req=(title:%20section:1087kk%20edition:prelim)%20OR%20(granuleid:USC-prelim-title-section1087kk)&f=treesort&edition=prelim&num=0&jumpTo=true), the amount of need for a student for Title IV assistance during a period of enrollment is equal to the cost of attendance (COA) for the student, minus his or her student aid index (SAI), and minus his, her, or their OFA. COA components under[Section 472 of the Higher Education Act of 1965 (HEA), as amended](http://uscode.house.gov/view.xhtml?req=granuleid:USC-prelim-title20-section1087ll&num=0&edition=prelim) [20 USC 1087LL] provide the elements that are allowed in constructing a COA for an enrolled student based only on the costs for the period of enrollment. Since the recipients of the summer fellowships are not enrolled in the summer, the COA for the period of enrollment may not include the summer expenses and there is not a separate COA allowed for the summer period of non-enrollment. Section 480(j) of the HEA requires an institution to consider as OFA all scholarships, grants, loans, or other known assistance. The regulations in [34 CFR 673.5](https://www.nasfaa.org/part_673_campus-based_common_provisions#subb6735) and [685.102](https://www.nasfaa.org/Part_685_Federal_Direct_Loan_Program#suba685102) amplify and clarify that fellowships, excluding only non-need-based employment portions of those awards, are defined as OFA. The non-need-based employment portions only, if any, are excluded from fellowships as OFA since those employment earnings must be used in calculating the SAI. Those regulations do not provide for the subtraction of job-related expenses (which may under certain conditions include living expenses) from fellowships except for portions that are need-based employment. Fellowships awarded for a period of non-enrollment must be treated as OFA for the academic year period of enrollment. Making the fellowships employment or having the fellowships as an academic component (even if only a non-credit requirement or elective for their program) would change the financial aid treatment of these fellowships."  
  
Further, per ED, it does not matter whether summer is a header or trailer. If the fellowship, assistantship, or internship is awarded during a period of nonattendance, it counts as OFA in the upcoming award year/academic year. The simplest way for schools to avoid treating such awards as OFA would be to make the fellowship, assistantship, or internship non-need-based employment.  
  
The above guidance applies regardless of what the award is called, and it includes such awards as fellowships, assistantships, and internships with grant/scholarship and work components.

**Is an Academic Or Graduation Incentive Award Paid To an Athlete Considered Other Financial Assistance?**

Award Year: 2024-25KA-36731Helpfulness Rating      *323 page views*

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This guidance is specific to the 2024-25 award year and later.

Yes. In an October 12, 2021 memo to its athletic directors, the Atlantic Coast Conference (ACC) relayed guidance it obtained from the U.S. Department of Education (ED) in which ED confirmed longstanding guidance regarding the treatment of other financial assistance (OFA) and clarified its stance regarding academic or graduation incentive awards paid to athletes. The following reflects the guidance provided by ED to the ACC.

ED stated that, although these awards are permitted under National Collegiate Athletics Association (NCAA) bylaws, those bylaws do not supersede Title IV statute and regulations governing the treatment of OFA, specifically requiring that “any source of assistance a student receives as the result of his or her status as a student” is to be treated as OFA since the funds are paid as a result of the student’s enrollment in the institution or to pay educational expenses [see 34 CFR [673.5(c)(1)(xiii)](https://www.nasfaa.org/part_673_campus-based_common_provisions#subb6735c1xiii), [685.102(b)](https://www.nasfaa.org/Part_685_Federal_Direct_Loan_Program#suba685102b).

ED went on to say,  that  such awards may affect current aid eligibility since they are considered part of other financial assistance in calculating student need; and the taxable portion of the award (generally, the part of the award in excess of tuition, fees, books, course materials, supplies and equipment should be reported in on the FAFSA. The taxable amount reported is deducted from total income in computing students’ SAI.

ED further clarified that the treatment as OFA of any funds a student receives because of his or her enrollment “is not contingent on which expenses the source of that funding intends it to be used for or even whether the stated intent is for it to be used for educational expenses at all. The student has the funds and could (whether expected to or not) apply them toward educational expenses. That level of achievement is a consideration in the awarding of these grants, makes no difference. Even a prize for winning a contest, e.g., an art competition, is considered OFA if the reason for the winner being able to participate is that he or she is a student.”

ED also reminded schools that OFA does not affect the amount of a student’s Federal Pell Grant award. Eligibility for a Pell Grant is based entirely on the student's student aid index (SAI). A Pell Grant is never reduced in consideration of other sources of aid or to eliminate an overpayment.

Reference Dear Colleague Letter [GEN-21-08](https://fsapartners.ed.gov/knowledge-center/library/dear-colleague-letters/2021-11-08/treatment-name-image-and-likeness-compensation-awarding-title-iv-hea-assistance).

**Is There a De Minimis Amount That Is Allowable Without Having To Count a Resource As Other Financial Assistance?**

Award Year: 2024-25KA-36714Helpfulness Rating      *215 page views*

 Add To Favorites

This guidance is specific to the 2024-25 award year and later.

No. There is no de minimis or minimum amount under the definition of other financial assistance (OFA) in [34 CFR 685.102(b)](https://www.nasfaa.org/Part_685_Federal_Direct_Loan_Program#suba685102b) and [673.5(c)](https://www.nasfaa.org/part_673_campus-based_common_provisions#subb6735c). Any amount of OFA the student receives due to postsecondary enrollment (no matter how small) is OFA when packaging a student.

**Note:**Even though the regulatory references provided above specify estimated financial assistance (EFA), starting with the 2024-25 award year under the [FAFSA Simplification Act](https://docs.house.gov/billsthisweek/20201221/BILLS-116HR133SA-RCP-116-68.pdf), EFA becomes other financial assistance (OFA).

**Is a Combination Scholarship/Stipend Treated as Other Financial Assistance?**

Award Year: 2024-25KA-36730Helpfulness Rating      *485 page views*

 Add To Favorites

This guidance is specific to the 2024-25 award year and later.

**Scenario:**We have assistantships and fellowships which contain both a scholarship (or grant) component and a stipend component.  
  
**Answer:** The scholarship/grant portion of the award is treated as other financial assistance (OFA) when packaging the student. As for the stipend portion of the award, you must first check with your school's human resources (HR) department to see if the stipend award is considered employment under federal or state law. If the stipend award is not considered employment, it is treated as OFA.  
  
If the stipend is considered employment, you need to determine if the stipend was awarded to the student based on any form of need analysis (federal or otherwise). If the stipend is employment awarded based on need, the amount of the stipend award is treated as OFA. If the stipend is employment but not awarded based on need, the stipend award is not treated as OFA; it is income and it will appear as income on the following year’s tax return and on the following year’s FAFSA (if one is filed).  
  
According to guidance NASFAA has received from the U.S. Department of Education (ED), the above rules apply even if the assistantship or fellowship is received during a period of nonattendance, such as the summer between academic years. If the assistantship or fellowship is awarded during a period of nonattendance, it counts as EFA in the upcoming award year/academic year.

**Can a School Pay Student Expenses and Not Count It As Other Financial Assistance If It Is Under a Certain Amount?**

Award Year: 2024-25KA-36971Helpfulness Rating      *84 page views*

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This guidance is specific to the 2024-25 award year and later.

**Scenario:** We would like to offer small resources out of a grant funded program to assist with student expenses, such as buying bus passes and helping with book expenses through our bookstore. We want to set a $100 maximum on this assistance so that we don't have to treat it as other financial assistance (OFA) when packaging the student.  
  
**Answer:** No. It is NASFAA's understanding that such benefits are being provided by the college based on the student's enrollment at the college. Therefore, any cash amounts or the values of items which are included as educational costs in the student's cost of attendance (COA) must be treated as other financial assistance (OFA) when packaging the student. Because transportation and books are components of the COA, the value of the bus passes and books being paid by the college must be packaged as OFA. There is no minimum amount to avoid treating these benefits as EFA--that is, any amount (no matter how small) provided under this program must be treated as OFA when packaging the student.  
  
The same is true for any other assistance, benefits, or gifts provided to the student as a result of enrollment in postsecondary education.

**How Do We Handle Receipt Of Other Financial Assistance (OFA) Late In the Award Year?**

Award Year: 2024-25KA-36641Helpfulness Rating      *643 page views*

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This guidance is specific to the 2024-25 award year and later.

**Scenario:**At this time of year we have students whose loans are fully disbursed and who receive additional outside scholarships which put them over need or over budget.

**Answer:** If other financial assistance (OFA) is received after Direct Loan funds have been disbursed and the institution was unaware that the student would be receiving that OFA until after the loan funds were disbursed, then the Direct Loan does not need to be reduced or adjusted. The student repays the loan according to the terms of the promissory note. Any undisbursed Direct Loan funds and any disbursed or undisbursed campus-based or TEACH Grant awards would need to be adjusted to clear any overaward or overpayment.

See Volume 4, Chapter 3 of the *FSA Handbook* for additional guidance.

**Student Aid Reference Desk:** For additional information, try the [Student Aid Reference Desk](https://www.studentaidrefdesk.org/). It is a central hub of all the important financial aid resources you need with direct links to legislation, regulation, Dear Colleague Letters, and other ED and NASFAA references. It is updated on a rolling basis with the latest news and changes.