

Program Review and Top Ten Compliance

Program Review Essentials and the Top 10 Compliance Findings




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TASFAA Annual Conference

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Program Review Essentials



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What is a Program Review

- Method of oversight
- Evaluates compliance with Title IV, *Higher Education Act of 1965 (HEA)* statute and regulations
- Examination of financial aid, fiscal, and academic records
- Interviews with institutional staff and students
- Review of consumer information requirements
- Identifies errors in compliance and liabilities owed
- Tool to improve future institutional capabilities

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Why are Program Reviews Conducted

Secretary of Education mandated by law under Section 498A of the *Higher Education Act of 1965*, as amended (*HEA*), 20 U.S.C. § 1099c, to conduct program reviews at institutions of higher education participating in the Title IV, HEA programs:

(a) GENERAL AUTHORITY - In order to strengthen the administrative capability and financial responsibility provisions of this title, the Secretary -

(1) shall provide for the conduct of program reviews on a systematic basis designed to include all institutions of higher education participating in programs authorized by this title...

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Who Conducts Program Reviews

- Federal Student Aid
- Program Compliance
- School Eligibility Service Group (SESG)
- School Participation Division
- Program Review Team

Secretary of Education has delegated responsibility for conducting program reviews

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How Are Institutions Selected

20 U.S.C. 1099c-1 (a)(2): *(The Secretary) shall give priority for program review to institutions of higher education that are institutions with:*

- High cohort default rate or dollar volume of default (25%+)
- Significant fluctuations in Federal Pell Grant or loan volume
- Reported deficiencies or financial aid problems by state or accrediting agency
- High annual dropout rates, or
- Any other institution the Department determines may pose significant risk of failure to comply with administrative capability or financial responsibility requirements

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Preparation for Program Review

- Receiving Notification of Program Review
- Advance Notice Review
- Short Notice Review
- Third-Party Servicer Notification
- Responding to Announcement Letter

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Entrance Conference

- On-Site Program Review
 - Introductions
 - Reason for Program Review and Scope
 - Overview of Program Review Process
 - Title IV Processing/Staff Responsibilities
 - Required Documents and Time Frames
 - Schedule Exit Conference
 - Getting Started
- Off-Site Program Review
 - Conference Call
 - Usually Limited Scope
 - Program Review Process

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Review of Institutional Processes and Data

- Review of Institutional Documents Collected
 - Catalog/Brochure/Handbook
 - Policies and Procedures
 - Published Campus Security Information
 - Student Consumer Publications
 - Online Student Consumer Information
 - Institutional Forms, Applications, and Worksheets

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Review of Institutional Processes and Data

- Review of Institutional Critical Elements
 - Eligible Institution
 - Administrative Capability
 - Program Eligibility
 - Consumer Information
 - Campus Security
 - Financial Responsibility
 - Fiscal Review
 - FISAP

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Review of Student Level Information

- Review of Student Critical Elements
 - Student Eligibility
 - Attendance
 - Cost of Attendance
 - Credit Balances
 - Enrollment Status
 - Dependency Overrides/Professional Judgment
 - Return of Title IV Funds
 - Satisfactory Academic Progress
 - Verification
 - Calculations/Disbursements
 - Entrance and Exit Counseling

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Review of Student Level Information

- Records Reviewed in Student Files
 - Admissions
 - Academic
 - Financial Aid
 - Student Account Ledger
- Student Records Compared to Department Data
 - NSLDS®
 - COD
 - CPS
- Student and Staff Interviews

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Exit Conference

- On-Site Program Review
 - Field Work Substantially Completed
 - Required Actions
 - Outstanding Items
 - Preliminary Findings
 - Next Steps

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On-Site Program Review Completed

- Possible Outcomes
 - Additional Information Requested
 - Expedited Determination Letter (EDL) Issued
 - Program Review Report (PRR) Issued

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Request For Additional Information

- Institution requested to send documentation
- Short time frame to provide information
- Possible outcomes if information not provided
 - Visit scheduled to review documents on-site
 - PRR includes findings otherwise omitted
 - PRR includes Lack of Administrative Capability finding

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Expedited Determination Letter

- EDL issued
 - No instances of non-compliance (findings) or only minor (non-systemic) findings identified
 - Any findings corrected prior to issuance of EDL
 - Any liabilities were paid/collected prior to issuance of EDL
- Three standard sections
 - Scope of Review and Disclaimer
 - Findings, if applicable
 - Recommendations, if applicable
- Sample template in Program Review Guide
 - 2017 Guide on IFAP under Publications

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Program Review Report

- Identifies findings with regulatory citations
- Actions required by institution
- Standard sections
 - Cover page
 - Table of Contents
 - Institutional Information
 - Scope of Review and Disclaimer
 - Preliminary Findings and Required Actions
 - Recommendations, if applicable
 - Appendices and Enclosures
- Sample template in Program Review Guide

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Program Review Report Findings

- Student-Specific
 - No potential or actual liability
 - Potential or actual liability
 - Small error rate
 - High error rate – may require file review
- School Finding
 - Incomplete or unacceptable policies or procedures
 - Problems related to institutional eligibility, program eligibility, location eligibility, financial responsibility, financial reporting, other actions
 - No potential or actual liability
 - Potential or actual liability

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Institution Responds to PRR

- Written response
- Submitted by due date
- Concerns or disagreement with any PRR conclusions
- Document required actions from PRR
 - Correct policy or procedure
 - Correct student-specific error
 - File review conducted
 - Provide information to quantify liability
- Request extension of time for good cause

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Department Follow Up to Response

- Institutional response not received by due date
- Missing information or requires clarification
- Response rejected
 - Problems with documents for several file reviews
 - Typically given another 30 days to correct and respond

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Final Program Review Determination Letter (FPRD)

- Department's final determination for each finding
- Identifies liabilities and provides payment instructions
- Closes Program Review, if appropriate
- State authorizing and accrediting agencies receive copies
- Subject to FOIA (Freedom of Information Act)
- Two types:
 - No further action required
 - Further action required for payment of liabilities
- Sample template in Program Review Guide

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FPRD Closeout Letter or Appeal of Monetary Liabilities

- FPRD Closeout Letter
 - Issued after satisfactory response to FPRD
 - Not issued if institution files appeal
- Appeal of Monetary Liabilities
 - Filed within 45 days
 - Collection efforts deferred on appealed liability amount
 - Non-appealed liabilities must be paid
 - Billing resumes if decision is in the Department's favor

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Top 10 Audit and Program Review Findings



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Top 10 *Audit* Findings - by occurrences:
FY2017

1. NSLDS Enrollment Report– inaccurate/untimely reporting
2. Repeat Findings/Failure to Correct
3. Return of Title IV (R2T4) Calculation Errors
4. Return of Title IV (R2T4) Made Late
5. Verification Violations
6. Student Credit Balance Deficiencies
7. Qualified Auditor's Opinion
8. Pell - Overpayment/Underpayment
9. Entrance/Exit Counseling Deficiencies
10. G5 Expenditures - Untimely/Incorrectly Reported



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**Top 10 *Program Review* Findings –
by occurrences: FY2017**

1. NSLDS Enrollment Report– inaccurate/untimely reporting
2. Crime Awareness Requirements not met
3. Return of Title IV (R2T4) Calculation Errors
4. Drug Abuse Prevention Program Criteria Not Met
5. Student Credit Balance Deficiencies
6. Consumer Information Requirements Not Met
7. Verification Violations
8. Entrance/Exit Counseling Deficiencies
9. Inaccurate Recordkeeping
10. Satisfactory Academic Progress - Not Developed/Monitored

Findings on Both Lists

Audit and Review Findings:

- NSLDS enrollment reporting – Inaccurate/Untimely Reporting
- R2T4 calculation errors
- Verification violations
- Entrance/Exit counseling deficiencies
- Student credit balance deficiencies



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NSLDS Roster Reporting – Inaccurate/Untimely Reporting

- NSLDS Roster file (formerly called Student Status Confirmation Report [SSCR]) not submitted timely to NSLDS
- Untimely reporting of specific student information
- Failure to provide notification of last date of attendance/changes in student enrollment status
- Failure to report accurate enrollment types and effective dates

Regulation: 34 C.F.R. § 685.309(b)

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Repeat Finding – Failure to Take Corrective Action

- Failure to implement Corrective Action Plan (CAP)
- CAP did not remedy the instances of noncompliance
- Ineffective CAP used from previous year(s)
- Internal controls not sufficient to ensure compliance with FSA guidelines

Regulations: 34 C.F.R. §§ 668.16 and 668.174(a)

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R2T4 Calculation Errors

- Incorrect number of days used in term/payment period
- Actual clock-hours used instead of scheduled hours
- Incorrect aid used as “could have been disbursed”
- Incorrect withdrawal date
- Mathematical and/or rounding errors

Regulation: 34 C.F.R. § 668.22(e) and (f)

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R2T4 Funds Made Late

- Returns not made within 45-day allowable time frame
- School's policy and procedures not followed
- Inadequate system in place to identify/track official and unofficial withdrawals
- No system in place to track number of days remaining to return funds

Regulations: 34 C.F.R. §§ 668.22(j) and 668.173(b)

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Verification Violations

- Verification documentation missing/incomplete
- Income tax transcripts missing
- Untaxed income not verified
- Interim disbursement rules not followed
- Conflicting data not resolved

Regulations: 34 C.F.R. §§ 668.51 – 668.61 (Subpart E) and 668.16(f)

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Student Credit Balance Deficiencies

- Credit balance not released to student within 14 days
- No process in place to determine when credit balance has been created
- Non-compliant authorization to hold Title IV credit balances
- Credit balances not released by end of loan period or award year

Regulations: 34 C.F.R. §§ 668.164(h) and 668.165(b)

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Qualified Auditor's Opinion Cited in Audit

- Anything other than unqualified opinion
- Serious deficiencies/areas of concern in compliance audit/financial statements
 - R2T4 violations
 - Inadequate accounting systems and/or procedures
 - Lack of internal controls

Regulation: 34 C.F.R. § 668.171(d)(1)

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Pell Grant Overpayment/Underpayment

- Incorrect Pell Grant formula
- Inaccurate calculations
 - Proration
 - Incorrect EFC
 - Incorrect number of weeks/hours
- Change in enrollment status

Regulations 34 C.F.R. §§ 690.62, 690.63, 690.75, 690.79 & 690.80

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Entrance/Exit Counseling Deficiencies

- Entrance counseling not conducted/documented for first-time borrowers
- Exit counseling not conducted/documented for withdrawn students or graduates
- Exit counseling materials not mailed to students who failed to complete counseling
- Exit counseling completed late

Regulation: 34 C.F.R. § 685.304

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G5 Expenditures Untimely/Incorrectly Reported

- Failure to submit Federal Pell Grant, Teach Grant, and Direct Loan disbursements to COD within 15 days after making such disbursements
- Date Title IV funds are credited to student's account must match disbursement date reported by school in COD
- Date of disbursement reported in COD for Direct Loans is the date provided to Loan Servicers and is the time when interest begins to accrue on the loan funds

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Crime Awareness Requirements Not Met

- Campus security policies and procedures not adequately developed
- Annual report not published and/or distributed
- Annual report missing required components
- Failure to develop a system to track and/or log all required categories of crimes for all campus locations

Regulations: 34 C.F.R. §§ 668.41, 668.46(c) & 668.49

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Drug Abuse Prevention Program Requirements Not Met

- Failure to document drug prevention program policies
- Failure to distribute annual written information about drug prevention to students and employees
- Missing written statement about standards of conduct prohibiting unlawful possession
- Missing description of legal sanctions imposed under local, State, or Federal law
- Failure to provide description of drug/alcohol counseling/treatment programs

Regulation: 34 C.F.R. § 86.100

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Consumer Information Requirements Not Met

- Missing institutional financial assistance information
- Missing institutional information
- Missing health and safety information
- Missing disclosures of institutional outcomes
- Missing FERPA disclosure information
- Missing gainful employment disclosures

Regulations: 34 C.F.R. §§ 668.41 and 668.42 and 668.43

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Inaccurate Recordkeeping

- Failure to document enrollment status before disbursement
- Failure to determine unofficial withdrawals
- Failure to maintain consistent disbursement records
- Inadequate or mismatched attendance records for schools required to take attendance
- Inaccurate/missing Federal Work-Study timesheets
- Conflicting Last Dates of Attendance (LDA)
- Failure to follow policies and procedures

Regulations: 34 C.F.R. §§ 668.24 and 668.161-668.167

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SAP Policy Not Adequately Developed/Monitored

- One or more missing required components of the Satisfactory Academic Progress (SAP) policy
- Qualitative, pace of completion, maximum timeframe, reestablishing aid eligibility
- Improper use of financial aid warning, appeals, probation, and academic plans in SAP policy
- Failure to consistently or adequately apply SAP policy
- Aid disbursed to students not meeting SAP standards
- Insufficient or missing documentation to support SAP

Regulations: 34 C.F.R. §§ 668.16(e), 668.32(f) & 668.34

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SCHOOL ELIGIBILITY SERVICE GROUP (SESG)

Ron Bennett - Director, School Eligibility Service Group, Washington, DC (202) 377-3181
 School Eligibility Service Group General Number: 202-377-3173 or email: CaseTeams@ed.gov

Or call the appropriate School Participation Division manager below for information and guidance on audit resolution, financial analysis, program reviews, school and program eligibility/recertification, and school closure information.

New York/Boston School Participation Division <small>Connecticut, Maine, Massachusetts, New Hampshire, Rhode Island, Vermont, New Jersey, New York, Puerto Rico, Virgin Islands</small> Betty Coughlin, Director (646) 428-3737 Chris Curry - New York (646) 428-3738 Jeremy Early - Washington, DC (202) 377-3629 Tracy New - Boston (617) 288-1451	Atlanta School Participation Division <small>Alabama, Florida, Georgia, Mississippi, North Carolina, South Carolina</small> Christopher Miller, Director (404) 974-9287 Vanessa Dillard - Atlanta (404) 974-9418 Vinita Simpson - Atlanta (404) 974-9286	Chicago/Denver School Participation Division <small>Illinois, Minnesota, Ohio, Wisconsin, Indiana, Colorado, Michigan, Missouri, North Dakota, South Dakota, Utah, Wyoming</small> Douglas Parratt, Director (312) 738-1332 Brenda Yette - Chicago (312) 738-1332
Philadelphia School Participation Division <small>District of Columbia, Delaware, Maryland, Pennsylvania, Virginia, West Virginia</small> Nancy Gillford, Director (215) 656-6438 Sherie Bell - Washington, DC (202) 377-3349 Steven Marcucio - Philadelphia (215) 656-5554	Dallas School Participation Division <small>Arkansas, Louisiana, New Mexico, Oklahoma, Texas</small> Cynthia Thornton, Director (214) 661-9407 Jesse Moya - Dallas (214) 661-9472 Kim Peeler - Dallas (214) 661-9471	San Francisco/Seattle School Participation Division <small>Alaska, Arizona, California, Hawaii, Nevada, Idaho, Montana, Nevada, North Carolina, State of Minnesota, Alaska, Idaho, Oregon, Washington</small> Martina Fernandez-Rosario, Director (415) 486-5805 Erik Fosker - San Francisco (415) 486-5806 Opele Pfaender - San Francisco (415) 486-5814 or Seattle (206) 615-3699 Dyon Torrey - Washington, DC (202) 377-3639
Multi-Regional and Foreign Schools Participation Division <small>International</small> Michael Frois, Director - Washington, DC (202) 377-3384 Michelle Alford - Dallas (214) 661-8466 Julie Arthur - Seattle (206) 615-2232 Mark Buschick - Washington, DC (202) 377-4572 Joseph Smith - Washington, DC (202) 377-4321	Kansas City School Participation Division <small>Missouri, Kansas, Kentucky, Illinois, Arkansas, Tennessee</small> Vacant Director, Kansas City Angela Bean - Kansas City (816) 268-0534 Jan Brandow - Kansas City (816) 268-0489 Dval Corwin - Kansas City (816) 268-0429 Main number - (816) 268-0418	

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Training Feedback

To ensure quality training we ask all participants to please fill out an online session evaluation

- All registrants for this session will receive an email with a link to an electronic evaluation that we ask you to complete
- This feedback tool will provide a means to educate and inform areas for improvement and support an effective process for "listening" to our customers
- To register please go to - <https://event.me/k2mPk>

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Ask A Fed goes online!

FSA has implemented a new resource to assist Financial Aid Administrators obtain guidance about the FSA programs. Based on the popularity and effectiveness of the Ask A Fed desk at the annual FSA Training Conference, we have instituted a similar process using email. Please send your inquiries about Title IV regulations to AskAFed@ed.gov



The Ask A Fed email box is staffed every business day by a team of FSA Training Officers and they are ready to assist schools with their questions.

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Resources by Top 10 Findings



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Resources by Top 10 Findings

- **NSLDS Reporting – Inaccurate/Untimely Reporting**
 - Regulation: 34 C.F.R. § 685.309(b)
 - Dear Colleague Letter: GEN-12-06
 - NSLDSFAP website - newsletter updates
 - https://www.nslsdfap.ed.gov/nsls_FAP/default.jsp
 - "News & Events" along top of home page
- **Repeat Finding (Audit)**
 - Regulations: 34 C.F.R. §§ 668.16 and 668.174(a)

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Resources by Top 10 Findings

- **R2T4 Calculation Errors and R2T4 Made Late**
 - Regulations: 34 C.F.R. §§ 668.22(e) and (f); 668.22(j) and 668.173(b)
 - FSA Assessments: Schools - R2T4
 - R2T4 Worksheets
 - Electronic Web Application (<https://faaaccess.ed.gov>)
 - Paper (*FSA Handbook*, Volume 5, Chapter 1)
- **Verification Violations**
 - Regulations: 34 C.F.R. §§ 668.51 – 668.61 (Subpart E) and 668.16(f)
 - FSA Assessments: Students - Verification
 - *FSA Handbook*, Application & Verification Guide, Chapters 4 and 5

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Resources by Top 10 Findings

- **Entrance/Exit Counseling Deficiencies**
 - Regulation: 34 C.F.R. § 685.304
 - FSA Coach, Lesson B-403: Awarding Direct Loans and Lesson B-603: Exit Loan Counseling
 - *FSA Handbook*, Volume 2, Chapter 6
- **Qualified Auditor's Opinion Cited in Audit**
 - Regulation: 34 C.F.R. § 668.171(d)(1)
 - FSA Coach
 - FSA Assessments
 - *FSA Handbook*, Volume 4, Chapters 5 and 6; Appendix A

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Resources by Top 10 Findings

- **Pell Grants Overpayment/Underpayment**
 - Regulations: 34 C.F.R. §§ 690.62, 690.63, 690.75, 690.79 & 690.80
 - *FSA Handbook*, Volume 4, Chapter 3
- **Student Credit Balance Deficiencies**
 - Regulations: 34 C.F.R. §§ 668.164(h) and 668.165(b)
 - *FSA Handbook*, Volume 4, Chapter 2

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Resources by Top 10 Findings

- **G5 Expenditures Untimely/Incorrectly Reported**
 - Federal Register Volume 78, Number 40 (Thursday, February 28, 2013)
 - Regulation: 34 C.F.R. § 668.164(a)
 - *FSA Handbook*, Volume 4, Chapter 2
 - FSA Coach, Lesson B-505: Reporting Requirements

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Resources by Top 10 Findings

- **Crime Awareness Requirements Not Met *and* Consumer Information Requirements Not Met *and* Drug Abuse Prevention Program Requirements**
 - Regulations: 34 C.F.R. Parts 86 and 99
 - Regulations: 34 C.F.R. §§ 668.6, 668.41 - 668.49 (Subpart D)
 - Higher Education Act of 1965, as amended, Sec. 485
 - *FSA Handbook*, Volume 2, Chapters 6 and 7
 - Consumer Information Training
 - <http://fsatraining.info> (Training by Topics)
 - FSA Assessments: Schools - Consumer Information
 - Consumer Information Disclosures At-A-Glance
 - *The Handbook for Campus Safety and Security Reporting*
 - <http://www2.ed.gov/admins/lead/safety/campus.html>

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Resources by Top 10 Findings

- **Information in Student Files Missing/Inconsistent**
 - Regulations: 34 C.F.R. §§ 668.16(f) and 668.24(a),(c)
- **Satisfactory Academic Progress Policy Not Adequately Developed/Monitored**
 - Regulations: 34 C.F.R. §§ 668.16(e), 668.32(f) & 668.34
 - FSA Assessments: Students - Satisfactory Academic Progress (SAP)
 - *FSA Handbook*, Volume 1, Chapter 1
 - Satisfactory Academic Progress Training
 - <http://fsatraining.info> (Training by Topics)

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Top 10 Resources for Compliance Solutions



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Top 10 Resources

- FSA Assessments
 - <http://ifap.ed.gov/qahome/fsaassessment.html>
 - Consumer Information/Campus Security
 - Return of Title IV Funds
 - Institutional Eligibility
 - Satisfactory Academic Progress
 - Verification
 - Fiscal Management

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Program Review and Top Ten Compliance

Top 10 Resources

- **FSA Training**
 - <http://fsatraining.info/>
 - Fundamentals of Federal Student Aid Administration
 - FSA Coach
 - Consumer Information
 - Satisfactory Academic Progress
 - Institutional Eligibility
 - Recorded Webinars

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Top 10 Resources

- **Federal Student Aid (FSA) Handbook**
 - Application and Verification Guide
 - Chapter 4: Verification, Updates, and Corrections
 - Chapter 5: Special Cases
 - Volume 1 (Student Eligibility)
 - Chapter 1: School-Determined Requirements
 - Volume 2 (School Eligibility and Operations)
 - Chapter 6: Consumer Information & School Reports

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Top 10 Resources

- **FSA Handbook**
 - Volume 4 (Processing Aid and Managing FSA Funds)
 - Chapter 2: Disbursing FSA Funds
 - Chapter 3: Overawards and Overpayments
 - Chapter 5: Reconciliation in the Pell Grant and Campus-Based Programs
 - Chapter 6: Reconciliation in the Direct Loan Program
 - Appendix A: Accounting Systems
 - Volume 5, Chapter 1 (Withdrawals and the Return of Title IV Funds)

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Top 10 Resources

- Code of Federal Regulations
 - Title 34, Education
 - Part 84 (Drug Free Workplace)
 - Part 86 (Drug and Alcohol Abuse Prevention)
 - Part 99 (Family Education Rights and Privacy)
 - Part 600 (Institutional Eligibility under the Higher Education Act of 1965, as amended)
 - Part 668 (Student Assistance General Provisions)
 - Parts 673 – 676 (Campus-Based Provisions)
 - Part 685 (William D. Ford Federal Direct Loan Program)
 - Part 686 (TEACH Grant Program)
 - Part 690 (Federal Pell Grant Program)

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Top 10 Resources

- Campus Security
 - <https://www2.ed.gov/admins/lead/safety/campus.html>
 - <https://fsatraining.info/totara/coursecatalog/programs.php>
- Entrance/Exit Counseling
 - <https://studentloans.gov>
- Return of Title IV (R2T4) on the Web
 - <https://faaaccess.ed.gov>
- School Data on StudentAid.gov
 - <https://studentaid.ed.gov/about/data-center/school>
- Direct Loan School Guide (2008-09)
 - <http://www.ifap.ed.gov/dlsguides/2008DLSchGuide.html>

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