

Program Review Essentials and the Top 10 Compliance Findings

Bruce Honer | April 2017
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Program Review Essentials

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What is a Program Review?

- Method of oversight
- Evaluates compliance with Title IV, 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 of 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 concerns by the 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 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
 - Satisfactory Academic Progress
 - Verification
 - Calculations/Disbursements

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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
 - Preliminary Findings
 - Required Actions
 - Outstanding Items
 - 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

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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
 - 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
- Concern or disagree 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

- Response not received by due date
- Missing information or need clarification
- Response rejected
 - Problems with documents for several files
 - 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
- 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 in Department's favor

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Top 10 Audit and Program Review Findings


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Top 10 Audit Findings - by occurrences:
FY2015

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



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**Top 10 Program Review Findings –
by occurrences: FY2015**

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

Findings on Both Lists

Audit and Review Findings:

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



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**Audit/Program Review
Finding Specifics**



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**Repeat Finding –
Failure To Take Corrective Action**

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


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**NSLDS Enrollment Report–
Inaccurate/Untimely Reported**

- Enrollment Reporting Report 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

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R2T4 Calculation Errors




- Incorrect number of days/clock hours
- Ineligible funds as aid that 'could have been disbursed'
- Improper treatment of overpayments
- Incorrect withdrawal date
- Mathematical and/or rounding errors

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Return of Title IV Funds Made Late

- Returns not made within 45-day allowable timeframe
- 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



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Verification Violations



- Verification documentation missing/incomplete
- Income tax returns/transcripts missing
- Conflicting data not resolved
- Untaxed income not verified
- Corrections that exceed tolerance not submitted
- Interim disbursement rules not followed

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Pell Grant Overpayment/Underpayment



- Incorrect Pell Grant formula
- Inaccurate calculations
 - Incorrect EFC
 - Incorrect number of weeks/hours
 - Incorrect payment periods
 - Incorrect program academic year definition
 - Incorrect transfer student calculation
- Incorrect Pell recalculation (enrollment status change)

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Qualified Auditor's Opinion Cited in Audit

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



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Entrance/Exit Counseling Deficiencies

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



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Student Credit Balance Deficiencies

- Credit balance not released to student within 14 days
- No process in place to determine when a 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

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Improper Origination of Direct Loans


- Incorrect academic year dates or loan period dates
- Annual/aggregate loan limits exceeded
- Improper proration (program less than an AY or remaining period of study)
- Incorrect abbreviated loan period
- SULA reporting errors (subsidized loan limits)



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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



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Drug and Alcohol 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

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Consumer Information Requirements not met

Failure to provide general consumer info:

<ul style="list-style-type: none"> ✓ Financial assistance ✓ Programs, costs, facilities, policies ✓ Retention & placement rates 	<ul style="list-style-type: none"> ✓ FERPA disclosures ✓ Textbook information ✓ Private loans ✓ GE disclosures
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Failure to provide written policies to students for:

- Verification
- Disbursement process
- Credit balance procedures, etc.

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**SAP Policy –
Not Adequately Developed/Monitored**

- Missing required components
 - Qualitative, quantitative, maximum timeframe, remedial/repeat coursework, etc.
- 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 the standards
- Insufficient or missing documentation to support SAP

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Inaccurate Recordkeeping

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



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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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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>
- 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/dlsquides/2008DLSchGuide.html>

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Resources by Top 10 Findings

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Resources by Top 10 Findings


- **Repeat Finding (Audit)**
 - Regulations: 34 C.F.R. §§ 668.16 and 668.174(a)
- **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)

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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
- **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

- **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
- **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
- **Student Credit Balance Deficiencies**
 - Regulations: 34 C.F.R. §§ 668.164(e) and 668.165(b)
 - *FSA Handbook*, Volume 4, Chapter 2

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Resources by Top 10 Findings

- **Entrance/Exit Counseling Deficiencies**
 - Regulation: 34 C.F.R. § 685.304
 - FSA Coach, Lesson B-404: Direct Loan Entrance Counseling and Lesson B-603: Exit Loan Counseling
 - *FSA Handbook*, Volume 2, Chapter 6
- **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**
 - 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

- **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)
- **Information in Student Files Missing/Inconsistent**
 - Regulations: 34 C.F.R. §§ 668.16(f) and 668.24(a),(c)

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