

“Program Reviews—In It To Win It”
IASFAA Fall Conference
November 3, 2011



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“Program Review—In It To Win It”

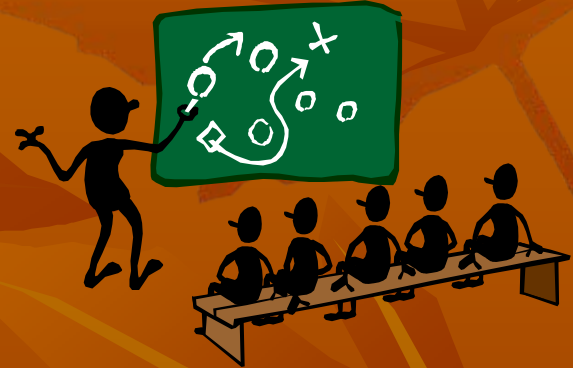
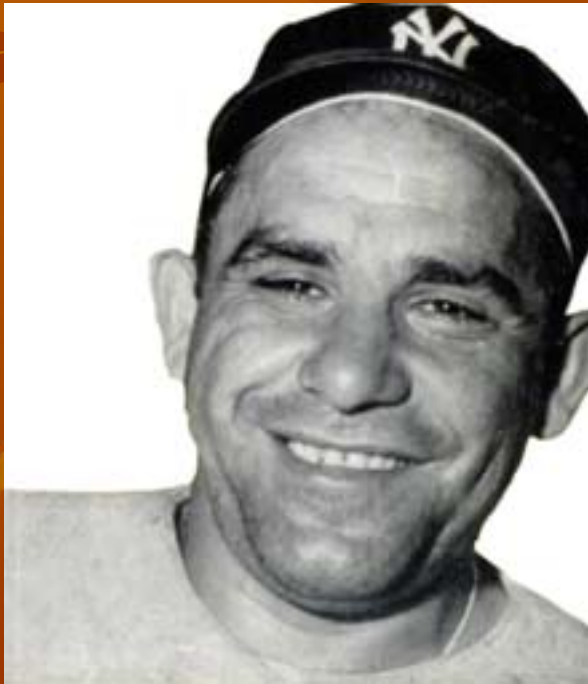
Session Goals

1. Part I: To review some of the basic concepts on how to develop a “game” plan.
2. Part II: To offer as an example how the “game” played out at one school

The information being provided is for informational purposes only and is not intended to serve as legal advice. Please do not rely upon it as legal advice. Any legal advice should be obtained from the recipient’s legal counsel.

Part I

Developing A Game Plan



“Baseball is 90% mental the other half is physical.”

Yogi Berra

Developing A Game Plan

Concept #1: Know The Game!

Audits

- <http://www.ifap.ed.gov/aguides/attachments/sfgd2000.pdf>
- Independent Auditor
- Scheduled by school
- Annual
- Compliance and Financial

Program Reviews

- <http://ifap.ed.gov/programrevguide/attachments/2009ProgramReviewGuide.pdf>
- Department of Education
- Announced or Unannounced with priority to schools that meet certain criteria
- General or Focused
- Most recently closed year and current year
- Compliance, Accounting and Fiscal Procedures

Developing A Game Plan

Concept #2: Know Your Opponent!

Top 10 Program Review and Audit Finding

(From 2010 FSA Conference Session #38)

Program Review	Audit
Verification Violations	Verification Violations
Return of Title IV Funds Made Late	Return of Title IV Funds Made Late
Return of Title IV Calculation Errors	Return of Title IV Calculation Errors
Student Credit Balance Deficiencies	Student Credit Balance Deficiencies
Pell-Overpayment/Underpayment	Pell-Overpayment/Underpayment
Satisfactory Academic Progress-Policy Not Adequately Developed/Monitored	Satisfactory Academic Progress-Ineligible Student
Entrance/Exit Counseling Deficiencies	Return of Title IV Funds Not Made
Account Records Inadequate/Not Reconciled	Overaward-Financial Need Exceeded
Information in Student Files Missing/Inconsistent	Enrollment Status Not Verified Before Disbursement
Crime Awareness Requirements Not Met	Improper Certification of Stafford Loan
	Repeat Finding-Failure to Take Corrective Action

Developing A Game Plan

Concept #3: Prepare For The Game!

NASFAA Self-Evaluation Guide

NASFAA's Policies & Procedures Tools are a set of integrated resources that assist you in improving your regulatory compliance, administrative consistency, and staff training. This essential management toolkit provides expert guidance and an organized approach to developing and maintaining policies and procedures.

FSA Assessments

In collaboration with financial aid professionals, Federal Student Aid has designed the FSA Assessments to help schools with compliance and improvement activities. The assessments contain links to applicable laws and regulations.

Developing A Game Plan

Concept #4: Practice for the Game!

- File Reviews
- Peer Reviews
- Third Party Reviews



Part II

Playing the Game



“In theory there is no difference between theory and practice. In practice there is.”

Yogi Berra



THE CALL



June 27, 2011

- **Lead program reviewer of Compliance Assurance Review (CAR) team**
- **Identified date for review (July 18)**
- **To cover 2010-2011 award year, to be expanded if appropriate**
- **Institution-wide effort to include interviews with Financial Aid Office, Student Records, Academics, Admission, Business/Finance**
- **Immediate follow-up letter identifying necessary preparation**



THE PREP



Due at Region VII: July 8

- Catalog/brochure to include all courses, class start/end dates, and locations
- URLs for all Title IV consumer information; consumer publication if not on web
- Organizational chart of administrative offices with individual names and titles
- Total current enrollment and % receiving Title IV, HEA program aid
- Accreditation Statements, state approvals, etc.



THE PREP



Due at Region VII: July 8

- **Policies and Procedures: admission, recruiting, withdrawals and Title IV returns, verification, Title IV awarding, credit balances**
- **Third party contracts applicable to Title IV administration**
- **State authorizations**
- **Any instructions or materials provided to students for online course participation**



THE PREP



Due at Region VII: July 8

- **2010-2011 Title IV Recipient Data Sheet including enrollment status (as of creation of data sheet) and:**
 - 1) **Title IV aid disbursed**
 - 2) **Selected for verification; PJ; dep. override**
 - 3) **Identify if received all non-passing grades for any term**
 - 4) **Title IV credit balances (amount received, date)**
 - 5) **Withdrawal for any reason other than graduation**
 - a. **Withdrawal date**
 - b. **Last Date of Attendance (if applicable)**
 - c. **R2T4 return amount(s) with date of return**



THE VISIT

July 18 – 21, 2011



- **Two reviewers - both experienced FAOs**
- **Review 3 ½ days**
- **Entrance Interview**
- **Initial FA Interview (80+ questions)**
- **Campus Interviews**
 - **Admission (all levels), Student Records, Institutional Research and Academic Compliance, Business and Finance**
- **File Review, Discussion, Questions, Region VII consultation**
- **Exit Interview**

PROGRAM REVIEW REPORT

August 23, 2011



Cover Letter

Finding(s)

Citation

Noncompliance

Example

Required Action

Recommendations (not “binding”)

PROGRAM REVIEW REPORT

August 23, 2011



FINDINGS:



PROGRAM REVIEW REPORT

(within 30 calendar days)

Written Narrative

Position Regarding the Finding

Corrective Action

Supporting Documentation

Noncompliance

Example

Required Action

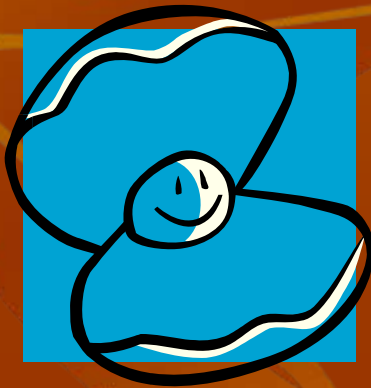
Recommendations (not “binding”)



FINAL PROGRAM REVIEW DETERMINATION

October 3, 2011

Responses Resolved All Findings
Review Closed with No Further
Action



Happy as a Clam!

Questions

“If you ask me anything I don’t know, I’m not going to answer.”

Yogi Berra

