



# Program Review Success Today and Tomorrow:


A Collaborative Campus Effort

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## Agenda



- Why program reviews are conducted
- The program review process
- Common findings
- Causes of findings
- Tips for program review success
- Helpful resources



## Why Program Reviews Are Conducted

### Why Program Reviews Are Conducted



- Federal law, regulations, and policies require schools to have various types of compliance reviews by external organizations to ensure that federal student aid funds are being properly used by schools and students.
- Five main types of reviews include:
  - Title IV audits conducted by an independent public auditor
  - Department of Education program reviews
  - Guaranty agency program reviews
  - Accrediting agency reviews
  - School self-evaluations



## Why Program Reviews Are Conducted



- Federal regulations stipulate which institutions should be selected for a program review
  - A high default rate
  - Abnormal fluctuations in loan and/or Pell volume
  - High annual drop out rates
  - Reported to have deficiencies or financial aid problems by state or accrediting agencies



## Why Program Reviews Are Conducted



- Beneficial outcomes
  - Serve as a diagnostic resource
  - Provide a compliance evaluation mechanism
  - Promote increased awareness of regulatory policies and procedures



# The Program Review Process

## The Program Review Process



### The Pre-Review Process


- School is selected
- Scope of the review is determined
  - General or focused (ED)
  - Award year(s) to be included
- School is contacted and informed they have been selected for a program review
  - Telephone call
  - Official notification letter is sent
    - Confirms review dates and location
    - Identifies award years covered in the review
    - Includes a list of information required prior to the on-site portion of the review



## The Program Review Process


### The On-Site Review

- Entrance conference with all pertinent staff
- Full file review is conducted
  - Admission records
  - Academic records
  - Financial aid records
  - Student account ledgers
- Maintain communication with a designated point of contact
- Conduct exit conference



## The Program Review Process

<u>Department of Education</u>	<u>Guaranty Agency</u>
<ul style="list-style-type: none"> <li>• Report is issued               <ul style="list-style-type: none"> <li>– Expedited final program review determination letter                   <ul style="list-style-type: none"> <li>• No significant findings</li> <li>• Closes out the review</li> </ul> </li> <li>– Program review report                   <ul style="list-style-type: none"> <li>• Findings to which the school must respond to</li> </ul> </li> <li>– Final program review determination letter                   <ul style="list-style-type: none"> <li>• ED accepts school response</li> <li>• Closes out review</li> </ul> </li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• Final report               <ul style="list-style-type: none"> <li>– Issued once all findings have been resolved</li> <li>– Recaps findings and school's response</li> </ul> </li> <li>• The review close-out               <ul style="list-style-type: none"> <li>– Copy of report is sent to regional field office of ED</li> </ul> </li> </ul>



## Common Findings

### Common Findings



- Findings from an auditor's perspective
  - Criteria – how should it be?
  - Condition – what exists now?
  - Cause – how did it get that way?
  - Effect – what are the consequences?
  - Recommendations – what should be done?



## Common Findings



- Return of Title IV Funds
  - Incorrect withdrawal date
  - Incorrect date of determination
  - Late return of funds
  - Calculations not performed
  - Calculations performed incorrectly



## Common Findings



- Verification
  - Failure to perform required verification
  - Failure to document verification
- Entrance/Exit Counseling
  - Failure to perform required counseling



## Common Findings



- Ineligible students
  - Funds released in error
  - Inconsistent admissions requirements
  - SAP not met
  - Improper loan certification
  - Conflicting information not resolved
  - Missing documentation



## Causes of Findings



- Miscommunication between campus offices
- Unclear policies and procedures
- Lack of written procedures
- Poor recordkeeping
- Training issues
- Staff turnover
- Lack of internal controls



## Tips for Program Review Success

### Tips for Program Review Success



- Conduct self assessments of your school's administration of Title IV funds on a periodic basis
  - Ensure all paper documentation matches FAM system
  - Ensure school is following its own policies and procedures
- Always ensure there is sufficient documentation when:
  - Verification is required
  - Resolving conflicting information
  - Performing professional judgments
  - Making exceptions to your school's policies and procedures
- Re-check files selected for verification prior to awarding and disbursing funds to ensure an additional ISIR was not received



## Tips for Program Review Success



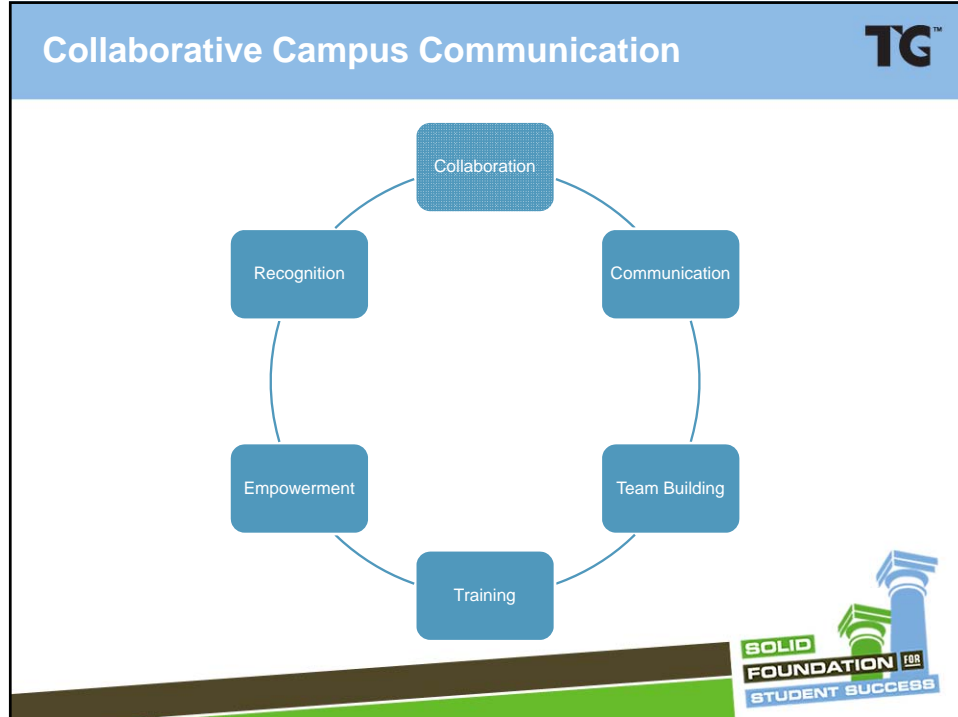
- Periodically review and update policies and procedures
- Archive inactive files
- Purge unneeded student records in accordance with applicable state, federal, and institutional guidelines
- Review and implement any corrective action plans that result from any internal/external reviews as soon as possible

Reference: NASFAA (2011) *Tips for your compliance health*. Retrieved from: *Preparing for an ED Program Review Webinar*



## Collaborative Campus Communication

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## Collaborative Campus Communication

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- Collaboration
  - Who are the players:
    - Financial Aid Office
    - Registrar/Academic Office
    - Business Office
    - Admissions Office
    - Faculty
  - Team identity
    - Identity within departments
    - Identify campus-wide
  - Staff buy-in
    - Create a means to where discussions are cultivated

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## Collaborative Campus Communication



- Communication
  - Inter-office
    - Ensure the message is getting across
      - Communication styles
      - Time management skills
  - Intra-office
    - Know who to talk to
    - Look for common solutions
      - Ex. Can the Business Office help with verification by contacting the student, follow-up, notification
  - Weekly check-in
    - 30 minute conference call between departmental managers/supervisors, include staff to discuss status or issues
  - Quarterly Meeting
    - 90 minute meeting with departmental managers to discuss review topics or plans (provide lunch or do a potluck)



## Collaborative Campus Communication



- Team building
  - Inter-office
    - Make time to build a team
      - Schedule weekly meetings (round tables or huddles)
      - Conduct team building exercises
      - Have lunch, breakfast, potluck
  - Intra-office
    - Make time to build a team
      - Introduce players from other offices
      - “Field trips” to other offices
      - Have lunch, breakfast, potluck



## Collaborative Campus Communication



- Training
  - New employee training plan
  - Existing employees – already invested in them
  - Buddy system (partners within the team)
  - Review modules (monthly informational reviews)
  - Regulations (identify and communicate new policy/procedures)
  - External sources (“What’s my Communication Style,” team building, policy review)



## Collaborative Campus Communication



- Empowerment
  - Red-flag warnings: have a process to escalate and review issues as they are identified
    - Flag record for review/escalation
    - After review, return record and continue processing
    - Document resolution and log for training
  - Cross-train: ensure staff understands whole process
    - Create flow charts with offices and names of staff responsible for certain functions
    - Encourage staff to learn the process



## Collaborative Campus Communication



- Recognition
  - Recognize team efforts
    - Ex. *This month we met our goal in packaging, verification, refund units.*
  - Recognize school efforts
    - Ex. *This month we lowered our attrition rate; we implemented a forward looking communication plan; we completed “X” number of collaborative training units.*
  - Recognize and acknowledge “wins”
    - Ex. *Testimonials of how staff in various offices contributed to a meaningful student experience.*




## Resources

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## Helpful resources



- FSA Coach
- FSA Assessment
- Dear Colleague Letters
- *Federal Student Aid Handbook*
- *Common Manual*
- ED Institutional Improvement Specialist
- ED Regional Training
- Conference Presentations
- Industry training



## Helpful resources



### FSA COACH 2010-11

START HERE  
GO FURTHER  
FEDERAL STUDENT AID

**Main Menu**

Introduction and Course Features

1. Introduction to Federal Student Aid
2. The FSA Ecosystem
3. Student/Family Responsibilities
4. School Responsibilities: Communication
5. School Responsibilities: Awarding Aid
6. School Responsibilities: Fiscal and Records Management
7. Determining Student Eligibility for FSA
8. School Responsibilities: Enrolled and Former Students
9. Evaluation of Title IV Program Management

Program Review Tutorial

<http://ifap.ed.gov/ifap/fsacoach.jsp>



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Helpful resources


## FSA Assessments

In collaboration with financial aid professionals, Federal Student Aid has designed management assessment modules to help schools enhance their services. The modules contain links to applicable laws and regulations. If you have questions regarding how to use this useful tool please visit our [FAQ page](#).

[This chart](#) features examples of specific compliance issues and provides recommendations for related assessments that your school may want to complete.

Students	Schools
<a href="#">Student Eligibility</a>	<a href="#">Institutional Eligibility</a>
<a href="#">Satisfactory Academic Progress</a>	<a href="#">Default Prevention &amp; Management</a>
<a href="#">Verification</a>	<a href="#">Consumer Information</a>
<a href="#">Managing Funds</a>	<a href="#">Automation</a>
<a href="#">Fiscal Management</a>	<a href="#">Policies and Procedures Templates</a>
<a href="#">Return of Title IV Funds</a>	<a href="#">A Guide to Creating a Policies and Procedures Manual</a>
<a href="#">FWS</a>	
<a href="#">FSEOG</a>	
<a href="#">Perkins Awarding &amp; Disbursement</a>	
<a href="#">Perkins Due Diligence</a>	
<a href="#">Perkins Repayment</a>	
<a href="#">Perkins Forbearance &amp; Deferment</a>	
<a href="#">Perkins Cancellation</a>	

<http://ifap.ed.gov/qahome/fsaassessment.html>



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Helpful resources

## iLibrary - Dear Colleague Letters

Dear Colleague Letters for the most recent three calendar years are categorized by year and by Dear Colleague Letter type on this page.

To view the Dear Colleague Letters for archived years, click [here](#).

**Dear Colleague Letters**


By Year

- [2011](#)
- [2010](#)
- [2009](#)

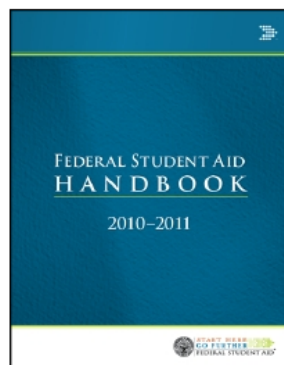
By Dear Colleague Letter Type

- [Campus-Based Programs \(CB type\)](#)
- [Financial Partners \(FP type\)](#)
- [General Distribution Letters \(GEN type\)](#)
- [Pell Grant Program \(P type\)](#)
- [Training Announcements \(ANN type\)](#)

<http://ifap.ed.gov/ifap/byYear.jsp?type=dpclletters>



## Helpful resources



### 2010-2011 Federal Student Aid Handbook

The Federal Student Aid Handbook consists of the Application and Verification Guide and six numbered Volumes. Each Volume is posted on the Web after being reviewed and approved by the appropriate offices in Federal Student Aid and the Office of Postsecondary Education.

You may pre-order print copies of the 2010-2011 FSA Handbook from the [FSAPubs Web site](#) (go to IFAP>Resource Links>FSAPubs.gov). Volumes are bundled for mailing purposes; print copies will be mailed after the last Volume of the Handbook has been approved and posted to the Information for Financial Aid Professionals (IFAP) Web site.

Questions and suggestions concerning the Handbook can be sent to the [Publications Team](#) in the Program Communications Division.

[2009-2010 Federal Student Aid Handbook](#)

[2008-2009 Federal Student Aid Handbook Archived](#)

<http://ifap.ed.gov/ifap/byAwardYear.jsp?type=fsahandbook&awardyear=2010-2011>



## Helpful resources



# COMMON MANUAL

*Unified Student Loan Policy*

*January 2011*

<http://www.tgslc.org/policy/integrated-online-manual.cfm>



## Questions?

This presentation is available for download at

[www.tgslc.org/tgconference](http://www.tgslc.org/tgconference).



**TG can help.**

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