

VASFAA Conference 2017

Department of Education Program Review Research and School Perspective

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Agenda

- ▶ Program Review Defined
- ▶ Top 10 Findings
- ▶ Program Review by the Numbers
- ▶ Additional Review Group
- ▶ FY14 and FY15 Program Review Research
- ▶ Program Review Example: TCC
- ▶ Resources
- ▶ Questions



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What is a Program Review?

- ▶ A routine review to confirm that a school meets FSA requirements for institutional eligibility, financial responsibility, and administrative capability. Reviewers will evaluate the school's compliance with FSA requirements, assess liabilities for errors in performance, and identify actions the school must take to improve its future administrative capabilities.

Source: <https://studentaid.ed.gov/sa/about/data-center/school/program-reviews>



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Top 10 Program Review Findings for FY15

1. Crime Awareness Requirements Not Met (129)
2. Verification Violations (128)
3. Return to Title IV (R2T4) Calculation Errors (106)
4. Student Credit Balance Deficiencies (105)
5. Drug Abuse Prevent Program Requirements Not Met (96)
6. Student Status-Inaccurate/Untimely Reporting (90)
7. Entrance/Exit Counseling Deficiencies (84)
8. Consumer Information Requirements Not Met (80)
9. Satisfactory Academic Progress Policy Not Adequately Developed/Monitored (75)
10. Inaccurate Recordkeeping (72)

Source: <https://studentaid.ed.gov/sa/about/data-center/school/program-reviews>



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Program Review Number Breakdown

- ▶ For FY16, there were a total of 141 schools that had a program review conducted.
 - Out of the 141 schools, 24 schools had a Clery Act finding
- ▶ For FY15, there were a total of 339 schools that had a program review conducted.
 - Out of the 339 schools, 39 schools had a Clery Act finding
- ▶ For FY14, there were a total of 187 schools that had a program review conducted.
 - Clery Act items were not identified separately for this FY

Source: <https://studentaid.ed.gov/sa/about/data-center/school/program-reviews>



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Important Averages

- ▶ Average number of findings per school (FY14 & FY15): 2
- ▶ Average amount of fines per institution:
 - FY14: \$193,042
 - FY15: \$188,968
- ▶ ***Note:** there are a very low number of average findings, but the average fine is still significant.

Source: http://www.nasfaa.org/news-item/6047/ED_Program_Review_Analysis_FY14_and_FY15



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Administrative Actions and Appeals Service Group (AAASG)

- **Responsibilities:** performs an additional and more extensive review of the institution's compliance with Clery Act reporting, consumer disclosures, and campus crime statistics. Additional fines are assigned based on the review conducted and the Department has the ability to fine institutions up to \$27,500 for each violation.

Source: https://www.ecfr.gov/cgi-bin/text-idx?node=34:3.1.3.1.34#se34.3.668_184



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NASFAA Research: FY14*

Total Sum of Fines	\$28,570,245.19
Average Fine Per Institution	\$193,042.20
Average Number of Findings Per Institution	1.7
Schools with Documented Fines	66; 44% out of reviews with reports
AAASG Referrals	22
Number of Schools with a Program Review and a NASFAA Standards of Excellence Review	4

*Not all reports in FY14 and FY15 were publicly viewable and therefore, were not used in calculating the statistics.



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NASFAA Research: FY15*

Total Sum of Fines	\$18,140,925.16
Average Fine Per Institution	\$188,967.97
Average Number of Findings Per Institution	1.9
Schools with Documented Fines	45; 47% out of reviews with reports
AAASG Referrals	24
Number of Schools with a Program Review and a NASFAA Standards of Excellence Review	5

*Not all reports in FY14 and FY15 were publicly viewable and therefore, were not used in calculating the statistics.



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Program Review Example

Tidewater Community College

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School Steps - Program Review

- Initial Notification
- Identify & Notify College Team
- Gather Requested Documents
- Participate in the On-site Review
- Receive Findings from ED
- Respond to Findings
- Wait for Final Communication from ED



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Keep It Simple

- Identify lead members of the team from each area of the College
- Centralize the collection of requested documents
- Meet timelines
- Prepare a work area for the on-site review team (close to your financial aid office)
- Don't hesitate to ask the reviewer questions
- Ask to review individual situation that the reviewer(s) has issues with



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What to Expect During the On-Site Visit

Don't be surprised by a second in-office interview with the reviewers.
Examples of unexpected questions:

- Are you receiving many students flagged for Unusual Enrollment History (UEH)?
- Are you reviewing your UEH students?
- Do you keep records of the UEH students you review?



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Create A Pleasant Working Relationship With The Reviewers

- Answer questions with a positive attitude
- Do not provide information in a way that will be viewed as negative or defensive
- Answer questions with confidence
- If not sure of an answer – research and get back to the reviewer
- Be prepared to provide additional documentation or follow-up information



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On-Site Findings

- Keep track of the findings during the review process
- Alert your supervisor to the findings before the exit interview



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Exit Interview

- There should be no surprises at the exit interview -
 - TCC's Initial Findings from the Program Review
 - NSLDS Timely Reporting
 - Title IV Refunds outside the allowed 14 days
 - One Direct Loan student that had been identified prior to the Program Review



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Notification of Findings

- Written notification of findings received
- Timeline for responses



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Submitting Responses to Findings

- Clearly state your responses to each finding:
 - Acknowledge each finding individually
 - Agree
 - Disagree
 - Document, document, document (more is better)



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Final Determination of Findings

Patience is Required At This Step!



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Lengthy Process

Notification	Date
Initial Notice of the Program Review	July 1, 2015
On-Site Review	July 25, 2015
Notification of Preliminary Findings	February 11, 2016
Submitted Responses to Findings (30 days to respond)	March 11, 2016
Received Final Letter from ED	August 4, 2016



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Need Assistance?

- ▶ NASFAA offers the Standards of Excellence program designed to provide strictly confidential, peer-led review that will focus on finding and correcting compliance issues before a program review happens.
- ▶ Email excellence@nasfaa.org for more information!



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Resources

- ▶ NASFAA: http://www.nasfaa.org/news-item/6047/ED_Program_Review_Analysis_FY14_and_FY15
 - Standards of Excellence:
http://www.nasfaa.org/Standards_of_Excellence_Review_Program
- ▶ Department of Education: <https://studentaid.ed.gov/sa/about/data-center/school/program-reviews>
- ▶ Code of Federal Regulations: https://www.ecfr.gov/cgi-bin/text-idx?node=34:3.1.3.1.34#se34.3.668_184



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