

Pennsylvania Higher Education Assistance Agency

## **Program Review**

James Snyder, Manager Institution Compliance & Eligibility State Grant and Special Programs

We Are All Super Heroes 2019 PASFAA Spring Training

## **PROGRAM REVIEW – WHAT NOW?**



## **PROGRAM REVIEW – BACKGROUND**

#### Elizabeth McCloud, Vice President, State Grant and Special Programs

James Snyder, Manager, Institution Compliance & Eligibility Jeanne Hendricks, Senior Compliance Coordinator

Helen Bardzak, Senior Compliance Coordinator

> Raye Thompson, Compliance Coordinator

> > Jana Madar, Compliance Coordinator

Andrea Staron, Associate Compliance Coordinator

## **PROGRAM REVIEW – WHY?**

1. Ensure that schools are managing programs correctly.

2. Verify, support and preserve taxpayers' funding.

3. Keep an open line of communication between PHEAA and institutions.



## **PROGRAMS REVIEWED**

PA State Grant Program	Institutional Assistance Grant (IAG)	Ready to Succeed Scholarship (RTSS)	
Partnership for Access to Higher Education (PATH)	PA National Guards Education Assistance Program (EAP)	Blind or Deaf Benefit Grant (BDBG)	
Chafee Education & Training Grant (ETG)	State Work-Study Program (SWSP)	Act 101	
PA Targeted Industry Program (PA-TIP)	Matching Funds Federal Work-Study Program	Postsecondary Educational Gratuity Program (PEGP)	

# **TYPES OF REVIEWS**

#### **Routine Review**

- Conducted routinely to review policies and procedures
- Scheduled every 2-3 years

**Follow-Up Review** 

- Conducted when error rate exceeds 4.0% or if ≥4 administrative findings are identified during a review
- Scheduled for the following academic year

**Probationary Review** 

- Conducted if error rate exceeds 8.9% or if ≥4 administrative findings are identified for two consecutive years
- Scheduled for the following academic year

#### School Closing

Audit

- Conducted when an institution closes or intends to close
- Scheduled within 30 days before/after closure
- Conducted when fraud is reported or suspected
- Visits will usually be unannounced

## **PROGRAM REVIEW - TYPE**



- Completed the following academic year after a Routine Review produces:
  - An error rate that exceeds 4.0% and/or
  - Four or more Administrative Findings

## **PROGRAM REVIEW - TYPE**



- Completed after 2 consecutive reviews produce an error rate higher than 8.9%.
- If Program Review results continue to have high error rates it can lead to termination from the program.
- The different levels of probation are defined in the PA State Grant Program Handbook.

# Probation and Termination

PROBATION

#### PROBATION LEVEL 1 – Error rate exceeds 8.9% for 2 consecutive program reviews. Subject to the following:



#### PROBATION LEVEL 2 – Error rates exceeds 8.9% for 3 consecutive award years. Subject to the following:



### **PROBATION AND TERMINATION**



#### RELEASE FROM PROBATION

- 2 consecutive reviews with error rates below 4%.
- Schools will continue to be monitored for 2 years.



#### TERMINATION

• PHEAA's IAC Committee recommends that the school be removed from the list of approved institutions to the President/CEO of PHEAA.



#### TERMINATION REASONS:

- High Error Rate
- Academic Fraud
- Financial Fraud
- Bankruptcy
- School Closing
- High Cohort Default Rate
- Other Recognized
   Administrative Issues

## **PROGRAM REVIEW - TYPE**





- Conducted when an institution ceases operation or experiences loss of eligibility.
- Special procedures apply all student files are reviewed and may require two award years.
- ATTEMPT TO SCHEDULE WITHIN THE LAST WEEK OF CLASSES OR WITHIN 30 DAYS OF THE LAST STUDENT ATTENDANCE.

## PROGRAM REVIEW - THE START



# THE CALL FROM THE

## **COMPLIANCE COORDINATOR**

## PROGRAM REVIEW – THE START



Notification Letter is sent through email.

## **Program Review - Before**



Gather and submit to your Compliance Coordinator within 5 days:

- 1. Tuition refund policy
- 2. Satisfactory academic progress policy
- 3. Policies regarding online and hybrid courses

Notify individuals from the bursar and registrar office (ACT 101 Director) of the date for the review as a representative will be required to attend the entrance interview.



## **Program Review - During**

## At the Entrance Interview

You will receive the student sample listing

YOU WILL BE ASKED ABOUT:

1. Checking academic progress.

2. Offering remedial, online and hybrid classes.

3. Offering modules or different schedules.

## **Program Review - During**

#### Typical sample of students:

- 30 PA State Grant students and 10 students per special program.
- Overlapping student eligibility is permissible (ex: PA State Grant, PATH, and SWSP eligibility).
- For a Closing Review 100% of eligible students are reviewed.

#### You will need to Provide:

- Student's academic transcript
- Student's account statement
- Student's class schedule
- Prior college transcripts

## **Program Review – Working Documents**

#### The Coversheet

School Name:	Best University				OE:	12345678		Reviewer(s):	compliance continu	dal.		1
Academic Year Reviewed 2015-16				Exit Interview:			Last Review:	January, 2015-n	o error, Ferb	uary, 2013-	1	
Entrance Interview (date): 6/1/2017				rs 9a	Green cells populate other worksheets				Academic Progr	ess		
Person(s) Contacted:	Jane Doe, FA	AD, 123-555-4	466m j.doe@	bestu.edu, 9	87 Thisway St	., Best, PA, 1	2345-Admin t	building-Big B	lue			1
address:	1											
phone/directions:	1											
Stop for Parking Pass-Park	in lot A											
		-				-		_				
Type/# of Records Reviewed:		State Grant	30	LAG	0	PATIP	0	RTSS	0	EAP	1	1
Sample Total:		Chafee	0	PATH	0	SWS	0	Act 101	0	BDBG	0	1
Progress Check for State Gran	5	s	>S-after Spring	, R-after Summ	er		Te	rm Dates		QTR crdts 12-F	Sem crdts 8-FT	1
						815				1 gtr crdt = .66	sem crdt	
						F2015	8-28-xx	\$2016	1-16-xx			
		*change to ser	m and alter for	mula to /2 if s	em school	W2016		R2016	5-28-xx			
Program:XX-XX Award Year	Year	QTR* 1,2	Program:	Year	QTR* 3	Program:	Year	QTR* 4	Program:	Year	QTR* 5	1
Tuition	\$18,000.00		Tuition			Tuition			Tuition			1
Fees	\$400.00		Fees			Fees			Fees			Gift aid incld
Cost Override Limit T&F	\$13,800.00	\$4,600.00	Cost Override	\$0.00	\$0.00	Cost Override L	\$0.00	\$0.00	Cost Override Limit	\$0.00	\$0.00	Pell Grant
Program			\$32,000 cost c	ap-no CO for ind	liv stdt w/ T&F >	\$27,000						SEOG
Tuition&Fees			1				rs correspond to					Chafee & PA
Coster Override limit	\$0.00	\$0.00	Cost override o	thecked/ in samp	ple	the cost overri	de order on the					inst, schirsh
Program:	Year	QTR* 6	Program:	Year	QTR* 7	Program:	Year	QTR* 8	Program:	Year	QTR* 9	Byrd & GEAU
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Fees			Fees			Fees			Fees			NOT GIRLAId
Cost Override Limit T&F	\$0.00	\$0.00	Cost Override	\$0.00	\$0.00	Cost Override I	\$0.00	\$0.00	<b>Cost Override Limit</b>	\$0.00	\$0.00	EAP
												NEIS
Program:	Year	QTR* 10	Program:	gram: Year QTR* Online [] Ifund Tuition Policy [per prior rvw, pp Satis. Acad Prog Policy []				any WS(wor				
Tuition			Tuition					< 7 dys term	75%	1.5X		Teach Grant
Fees			Fees			1		>7dys <25%	55%			Number in F
		40.00			44.44	1		>25% < 50%	30%	1		
Cost Override Limit T&F	\$0.00	\$0.00	Cost Override	\$0.00	\$0.00			< 1st dy class 10				1
remedial												2
How online notated?					-	CHEC	KLISTS:					3
No night costs					SWS: PA rsdnt, a	at least half time	in > 2yr prog. Rv	w trnscpt, time o	ards/payroll	1		4
					PATH: ≤ st grt ar	nd/or org for sm	e term as st grt, v	w/d tuit ref,disb !	90 dys, AP, @ lst H/T	£		5
\$0/Deb bal ckd for all w/d & g	rad				CHAFEE: H/T, SA	P, w/d tuit ref,C	OA-gift aid					6
					BDBG: H/T, SAP	, w/d tuit ref, $\leq 0$	OA - other aid, n	nax \$500/yr, PA	sdt			7
					EAP: F/T 12; H/T	>3cr; no ROTC;	PA rsdt & PA sch	; lesser of chart	grad/undgrad or T or	(T+F+Allwnc) -ot	her military aid; w	
					RTSS: 3.25cmlts	GPA when ck Al	for grt; cmpltd 3	24cr(or eqvint) p	rior to 1st awd; all grt	t elig cks & cndtn	s to be met	TO ESCITE
								and or 75% up may	et cost wheever is less	1100M albertal cost		
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## **Program Review – Working Documents**

The Sample Sheet								
School:	Best University			OE Code:				
Review B	egin Date:	6/1/2017			Academi c Year Reviewed :	2015-16		
	SSN	NAME	STATE GRANT RECIPIENT	SGDEPP RECIPIENT	RTSS RECIPIENT	PATIP RECIPIENT	EAP RECIPIENT	PATH RECIPIENT
1	000-00-1234	APPLE, JOE	Y					
2	000-00-2345	BANANA,ANNA	Y					
3	000-00-3456	CAR, SMALL	Y					
4	000-00-4567	DEAR, ONE	Y					
5	000-00-5678	ERASER, PEN	Y					
6	000-00-6789	FLAP, PER	Y					
7	000-00-7890	GAS, GO	Y					
8	000-00-8901	HAPPY, FEET	Y					
9	000-00-0123	ICE, NO MORE	Y					
10	000-00-1123	JAM, GRAPE	Y					

## Program Review – During Types of Information Gathered

Refunds	Total dollars disbursed	Program budgets	
Total number of students	Term enrollment status	Prior award counters	
Program of study/cost per term	Remedial counters	Hours worked and student earnings	

## **Program Review – During**

#### **The Exit Interview**

 Held after the Compliance Coordinator has reviewed all the students and the information.





## **Program Review – Working Documents**

#### **Exit Interview – Findings Sheet**

рнеаа)	1200 North Seventh Street, Harrisburg, PA 17102-1444
School	0E Code
Date	_Compliance Coordinator
	FINDING(S)
School officials should include appro concern.	INITIAL MANAGEMENT RESPONSE priate documentation to support their position and/or resolve the Coordinator's
The school official's signature confirr signature does not necessarily const	ns that this information was presented to you by the Compliance Coordinator. Your tute agreement with the finding.
	Signature Date



## Program Review – Common Program Review Findings

ACADEMIC PROGRESS

DIFFERENT EDUCATION COSTS

ACADEMIC PROGRESS-TRANSFER STUDENT

CREDITING AFTER WITHDRAWAL

) NOT ENROLLED AT LEAST HALF-TIME

SPECIAL PROGRAMS FINDINGS

>=2 LATE ROSTER SUBMISSIONS

Based on the 2016-17 Academic Year

# Program Review - New Administrative Findings for 2018-19

Not reporting enrollment mode correctly

• Even if it doesn't affect the student award.

#### Cost Reporting

 Including costs that are not allowed by PHEAA such as graduation fees.



## **Program Review – After**



## **Program Review - After**

Initial Letter	No Error Letter
Lists the findings	A response is not required
Requires a response within 30 days.	Program Review is closed

## Program Review – After Submitting refunds

- When returning funds that have been requested – use the required form and always submit with a response letter.
- If you return the funds via EFT, you must also submit a response letter to
   Program Review.

	PROGRA	M REVIEW REPORT- REFUND(S) DUE	PHEAA
NAME OF INSTITUTION:			_ OE# CODE:
The attached refund check in t State Grant or special program	the amount of \$ is payment for the follo		is submitted as a refund o indicated.
NAME		TERM(S)/AMOUNT DUE	COMMENTS
(*) Example: 2017-18 Fall Semester/ \$20			
TELEPHONE NUMBER:			
		TITLE:	
		AGENCY ACTION	
<u>T0</u>	DATE	RECEIVED BY	COMMENTS:
Comptroller's Office			
Grant Division			

## **Program Review – After**



## **Program Review – After**

After all issues have been resolved and return of funds by your institution have been completed:

An error rate will be calculated: if above 4% and/or 4 or more administrative findings you will be notified by letter.

A PROGRAM IMPROVEMENT PLAN (PIP) WILL BE REQUIRED IF RATE IS ABOVE 8.9% AND/OR 4 ADMINISTRATIVE FINDINGS.

> The next award year review will be scheduled as a Follow-up and will look at specific programs.

## Resources

#### PHEAA.org

- 1. Partner Access, Program Review Process
- 2. Resources and Training, Program Review Assistance

#### Contact SGSP Staff:

- General Inquiries
  - SGHelp@PHEAA.org
  - 1-800-443-0646
- Program Review Inquiries
  - ProgramReview@PHEAA.org
  - 1-717-720-2740

#### **Print Materials**

- Handbook
- User Guides
- FAQ Documents
- Best Practices
- Tip Sheets





# THANK YOU!

James Snyder, Manager ProgramReview@PHEAA.org

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PHEAA