Program Review

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

We Are All Super Heroes
2019 PASFAAA Spring Training
PROGRAM REVIEW – WHAT NOW?

Before
During
After

STANDARDS
AUDIT
GUIDELINES
COMPLIANCE
LAWS
PROCEDURE
RULES
CODES
REVIEW
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.
School Closing
Probationary
Routine
Follow-up
Audit
School Closing

Types of Reviews
<table>
<thead>
<tr>
<th>PROGRAMS REVIEWED</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>PA State Grant Program</td>
<td>Institutional Assistance Grant (IAG)</td>
</tr>
<tr>
<td>Partnership for Access to Higher Education (PATH)</td>
<td>PA National Guards Education Assistance Program (EAP)</td>
</tr>
<tr>
<td>Chafee Education &amp; Training Grant (ETG)</td>
<td>State Work-Study Program (SWSP)</td>
</tr>
<tr>
<td>PA Targeted Industry Program (PA-TIP)</td>
<td>Matching Funds Federal Work-Study Program</td>
</tr>
</tbody>
</table>
# 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
- Conducted when an institution closes or intends to close
- Scheduled within 30 days before/after closure

## Audit
- Conducted when fraud is reported or suspected
- Visits will usually be unannounced
Follow-up

- 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

Probationary

- 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 LEVEL 1 – Error rate exceeds 8.9% for 2 consecutive program reviews.

Subject to the following:

1. • The Pre-disbursement process for the PA State Grant Program.

2. • Completion and submission of a Program Improvement Plan (PIP) for each finding.

3. • Scheduled annual program reviews until 2 consecutive reviews have acceptable final error rates of 4.0% or less.

4. • Within 90 days of being placed on probation, PHEAA will conduct individualized training (not exceeding 2 days) regarding identified issues.

5. • Continued monitoring by PHEAA.
PROBATION LEVEL 2 – Error rates exceeds 8.9% for 3 consecutive award years.
Subject to the following:

1. Disbursements held until the end of the payment period when written verification of student enrollment and eligibility is submitted to PHEAA.

2. Completion and submission of a PIP for each finding.

3. Scheduled for annual program reviews until 2 consecutive reviews have acceptable final error rates of 4.0% or less.

4. Within 90 days of being placed on probation, PHEAA will conduct an individualized training (not to exceed 2 days) regarding identified issues.

5. Continued monitoring by PHEAA.
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
Closing

- 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
• Notification Letter is sent through email.
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 - Before

Inform the Compliance Coordinator

1. The Physical Address of your building if different from the mailing address.

2. If your offices have moved since the last review.

3. If there is a need for a parking pass and where to park.
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

```
<table>
<thead>
<tr>
<th>Date Denied</th>
<th>123456789</th>
</tr>
</thead>
<tbody>
<tr>
<td>Comment</td>
<td>This is a comment</td>
</tr>
<tr>
<td>Date</td>
<td>01/01/2023</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Program Name</th>
<th>Code</th>
</tr>
</thead>
<tbody>
<tr>
<td>Tech</td>
<td>T1</td>
</tr>
<tr>
<td>Science</td>
<td>S2</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Year</th>
<th>Program</th>
<th>STA</th>
<th>STA</th>
<th>STA</th>
</tr>
</thead>
<tbody>
<tr>
<td>2012</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2013</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2014</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Program</th>
<th>Code</th>
</tr>
</thead>
<tbody>
<tr>
<td>Tech</td>
<td>T1</td>
</tr>
<tr>
<td>Science</td>
<td>S2</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Program</th>
<th>Code</th>
</tr>
</thead>
<tbody>
<tr>
<td>Tech</td>
<td>T1</td>
</tr>
<tr>
<td>Science</td>
<td>S2</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Program</th>
<th>Code</th>
</tr>
</thead>
<tbody>
<tr>
<td>Tech</td>
<td>T1</td>
</tr>
<tr>
<td>Science</td>
<td>S2</td>
</tr>
</tbody>
</table>
```

```
<table>
<thead>
<tr>
<th>SSN</th>
<th>NAME</th>
<th>STATE GRANT RECIPENT</th>
<th>SGDEPP RECIPENT</th>
<th>RTSS RECIPENT</th>
<th>PATIP RECIPENT</th>
<th>EAP RECIPENT</th>
<th>PATH RECIPENT</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>APPLE, JOE</td>
<td>Y</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2</td>
<td>BANANA, ANNA</td>
<td>Y</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3</td>
<td>CAR, SMALL</td>
<td>Y</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>4</td>
<td>DEAR, ONE</td>
<td>Y</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>5</td>
<td>ERASER, PEN</td>
<td>Y</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>6</td>
<td>FLAP, PER</td>
<td>Y</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>7</td>
<td>GAS, GO</td>
<td>Y</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>8</td>
<td>HAPPY, FEET</td>
<td>Y</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>9</td>
<td>ICE, NO MORE</td>
<td>Y</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>10</td>
<td>JAM, GRAPE</td>
<td>Y</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
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 – During

At the Exit Interview

1. All financial concerns are discussed.

2. Again – Ask Questions!

3. You will be asked to sign a Findings Sheet and make copy for your records.

4. The Coordinator advises what comes next.
Exit Interview – Findings Sheet

School: ___________________________ OE Code: ___________________________

Date: ___________________________ Compliance Coordinator: ___________________________

FINDING(S)

________________________________________________________________________

________________________________________________________________________

________________________________________________________________________

________________________________________________________________________

________________________________________________________________________

INITIAL MANAGEMENT RESPONSE

School officials should include appropriate documentation to support their position and/or resolve the Coordinator’s concern.

________________________________________________________________________

________________________________________________________________________

The school official’s signature confirms that this information was presented to you by the Compliance Coordinator. Your signature does not necessarily constitute agreement with the finding.

Signature: ___________________________ Date: ___________________________

Titled: ___________________________
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.
After the Exit Interview

Review the Findings Sheet and gather information.

An Initial or No Error Letter is typically mailed within 30 days of the Program Review.

Copies are sent to the FAD & the individual/office guiding Financial Aid.

The letter is sent to the President of the school and
Program Review - After

Initial Letter
- Lists the findings
- Requires a response within 30 days.

No Error Letter
- A response is not required
- 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.
The Compliance Coordinator will review the Response Letter and any returned funds.

If the Findings have been satisfied, a Closing Letter is mailed to the school.

...the Program Review is considered closed.
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

We Are All Super Heroes
2019 PASFAA Spring Training