



# 9 Common Questions Schools Have About Federal Program Reviews

50<sup>th</sup> Annual NYASFAA Conference

October 23-25, 2018



---

---

---

---

---

---

---

---



---

---

---

---

---

---

---

---



---

---

---

---

---

---

---


---







# 9 Common Questions Schools Have About Federal Program Reviews

50<sup>th</sup> Annual NYASFAA Conference  
October 23-25, 2018

**1. What is a Program Review?**



-  **Required by Law**
-  Evaluate the School
-  Focus on Title IV Provisions



Slide 4 © 2018 NASFAA

---

---

---

---


---

---


---

---

**2. What are the Types of Program Reviews?**



- General Assessment Reviews
- Focused Reviews
- Compliance Assurance Reviews
- Incentive Compensation Reviews
- Joint Program Reviews



Slide 5 © 2018 NASFAA

---

---

---

---




---

---

---

---

**3. Who Performs Program Reviews?**

Slide 6 © 2018 NASFAA

---

---

---

---

---

---

---

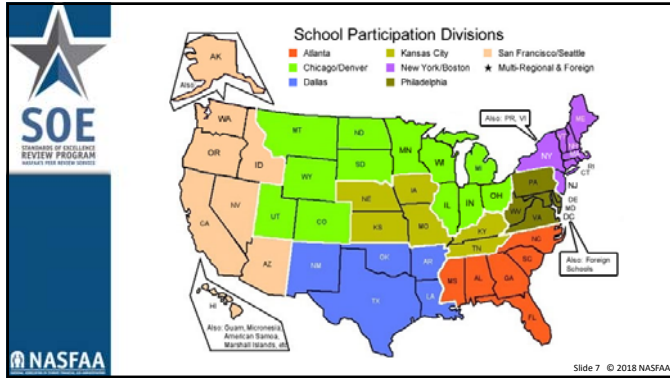
---



# 9 Common Questions Schools Have About Federal Program Reviews

## 50<sup>th</sup> Annual NYASFAA Conference

October 23-25, 2018




---

---

---

---

---

---

---

---

### 4. Why Does ED Conduct Program Reviews?

Schools must demonstrate they effectively manage the federal funds entrusted to them.

Slide 8 © 2018 NASFAA

---

---

---

---

---

---

---

---

### 5. When and How Often Will My School Have a Program Review?

Every school participating in Title IV aid programs will have a program review on a "systematic basis."

Slide 9 © 2018 NASFAA

---

---

---

---

---

---

---

---



# 9 Common Questions Schools Have About Federal Program Reviews

## 50<sup>th</sup> Annual NYASFAA Conference

October 23-25, 2018

**6. What Might Trigger a Program Review at My School?**

High Default Rate	Fluctuations in Pell Grant and/or Direct Loan Volume	Issues Reported by Outside Agencies
High Annual Dropout Rates	Risk of Failing to Comply with Administrative Capability Provisions	Risk of Failing to Comply with Financial Responsibility Provisions

Slide 10 © 2018 NASFAA

---

---

---

---

---

---

---

---

**7. What Financial Consequences May Result from a Program Review?**

**Liabilities**

Reason: Correcting Mistakes  
Example: R2T4 Calculation Errors

In FY 2016, ED imposed **over \$16 million** in liabilities.

Slide 11 © 2018 NASFAA

---

---

---

---

---

---

---

---

**7. What Financial Consequences May Result from a Program Review?**

**Liabilities**

Reason: Correcting Mistakes  
Example: R2T4 Calculation Errors

**Fines**

Reason: Punishing for Misconduct  
Example: Clery Act Violations

The maximum fine for campus safety violations is now **\$55,907 per incident.**

Slide 12 © 2018 NASFAA

---

---

---

---

---

---

---

---



# 9 Common Questions Schools Have About Federal Program Reviews

## 50<sup>th</sup> Annual NYASFAA Conference

October 23-25, 2018

**8. How Long Can My School be Held Responsible for Compliance Violations?**

There is no published guidance regarding the criteria ED uses to select the initial award year(s) under review and the triggers for expanding that timeframe.

 Slide 13 © 2018 NASFAA

---

---

---


---






---


---

---

---

**How Can My School Prepare for a Program Review?**

- Compile policies and procedures. 
- Attend training. 
- Conduct self-assessments. 
- Engage a third-party peer review service. 
- Ask questions. 

 Slide 14 © 2018 NASFAA

---

---

---

---

---


---

---

---

**Questions**

Mandy Sponholtz  
Standards of Excellence Administrator  
P: 202-785-6953  
E: sponholtzm@nasfaa.org

 Slide 15 © 2018 NASFAA

---

---

---

---

---

---

---

---