

Chapter II Review Preparation

A program review is a very complicated undertaking that involves the management of a great deal of information and may require the involvement of many people. Proper preparation and planning is therefore essential to maximize the efforts of everyone involved. This chapter summarizes some of the resources available to reviewers when preparing for a program review, and also discusses some logistical issues that should be considered.

To assist reviewers with pre-review planning, a sample Program Review Preparation Worksheet is included in Appendix A. Here the reviewer can record and summarize general information about the school, reasons a school was selected for review, results of research, issues to review while on-site, etc.

A. Review Information in ED Databases

ED has many sources for information on schools. By reviewing these sources, reviewers will gain additional insights about the school, and may even be able to conduct some evaluations of the school's processes before the on-site visit. Make a list of any areas of concern or suggested concentration that are identified during the review preparation stage and record them in the Program Review Preparation Worksheet.

1. PEPS (Postsecondary Education Participants System)

PEPS is the most comprehensive single source of information regarding schools participating in the Title IV programs. It serves as the initial data entry point for most information that SFA receives (e.g., school eligibility applications, audit data, etc.), and also serves as a source of information for other data systems (e.g., Institutional Assessment). Following is a discussion of data available in certain sections of PEPS.

CMIS (Case Management Information System): The CMIS section is used to document the case management of schools, relating to their participation in the Title IV programs. As such, it can be a rich source of information when preparing for the program review.

In most cases, the decision to conduct a program review was based on the results of case managing the school. Therefore, there should be notes for the applicable school in CMIS that document the results of the research performed by various team members (e.g., audit, eligibility, program reviews, financial analysis, etc), and the reasons for recommending that a program review be

conducted. This information should provide insight into areas of particular concern.

However, CMIS is generally only updated as cases are discussed. Therefore entries may not be all-inclusive, or may not be the most up-to-date information available to the reviewer.

Additionally, CMIS should be updated to establish a “program review” case record for the school.

Eligibility: This section contains information about a school that may be helpful in planning the program review, such as additional locations that have been reported to the Department or whether the school participates in the Quality Assurance Program or Experimental Sites Initiative. Other types of useful information include:

- School’s e-mail address;
- Length of academic programs;
- Whether the school operates with clock or credit hours (or both); and
- Identity of third-party servicers.

If not already discussed in case managing the school, reviewers can also identify conditions of any provisional recertification as a possible area of concentration during the review. Additionally, reviewers could perform searches based on ownership listings, to identify if there are other schools with common ownership.

Note that much of this information is summarized in the Detailed School Report available from PEPS.

Program Review: Although CMIS should contain information about prior program reviews, more detailed information about the types of findings and associated liabilities can be found in the program review section of PEPS. Generally, information is maintained for reviews closed within the last five years.

Audit: As with program reviews, CMIS should contain information about recent Title IV audits conducted at the institution. However, the audit section of PEPS will provide a more detailed record of the school’s audit history. Reviewers may check PEPS or consult their team’s audit resolution specialists for additional information on prior non-federal audits and audits by OIG staff. Serious audit findings, especially recurring violations in program review focus items, should be noted, added to the reviewer’s on-site checklist, and reviewed for corrective action.

If the team’s audit research suggests required audits have not been submitted, the Department’s Document Receipt and Control Center (DRCC) or the Federal

Audit Clearinghouse (for public and private/non-profit schools), may show that the audits have been submitted, but not yet released. If there is no record that audits have been submitted by required deadlines, this must be discussed with the school – non-submission of audits is a significant issue.

Default Management: This section provides a history of an institution's official Cohort Default Rates (CDRs). It provides, for each official CDR, the number of borrowers in repayment and the number of borrowers in default that were used to calculate the institution's CDR. If an institution's CDRs will be reviewed as part of the program review, the CMT should notify its Default Management Adjunct of the intended review and request all relevant information on the school, such as rate trends, program eligibility status, appeal status, and any other special circumstances related to calculation of the default rate.

Direct Loan: This section will identify the school's origination option, which determines such things as whether the school controls the draw down of Direct Loan funds, and when a school can disburse funds to students.

Financial Partners: This section of PEPS contains general information about guaranty agency reviews.

Experimental Sites: The Experimental Sites Initiative is a partnership for regulatory improvement and streamlining experiments between ED and approximately 135 schools. The schools are exempt from certain statutory and regulatory requirements while using alternative approaches for each requirement. Thirteen experiments are being conducted in financial aid processes related to loan management, award packaging, and eligibility. The outcome of this initiative is to assist ED in its continuing efforts to improve Title IV program administration. The experiments are:

- Federal Work-Study Time Records
- Exit Counseling
- Credit Title IV Aid to Institutional Charges
- Entrance Counseling
- Multiple Disbursement for Single Term Loan
- Overaward Tolerance
- Thirty-Day Delay for First-time, First-year Borrowers
- Ability-to-Benefit
- Loan Fees in Cost of Attendance
- Federal Work-Study Payment
- Loan Proration for Graduating Borrowers
- Credit Title IV Aid to Prior Term Charges
- Academic Term (Definition)

An overview of this initiative, including a description of each experiment, the statutory/regulatory citations, and goal of the experiment will be available soon on the PIPD intranet website at [Experimental-sites](#).

Additionally, information relative to the participants and the experiments is entered into PEPS and updated as changes occur. This will alert the teams as it does its review preparation what, if any, exemptions the school has been granted as an experimental site. While in PEPS, on the school information screen, click on the Experimental Sites box. This will take you to the Experimental Sites screen that lists the experiment type, start date and end date (if applicable).

Two of the areas of experimentation, 30 day delay and multiple disbursement, were included in reauthorization for a broader group of institutions. Through reauthorization, institutions with default rates below 10 percent are eligible for these exemptions. These schools are not reflected in this screen. However, some schools that are eligible for the exemptions through reauthorization, elected to continue as an experimental site to assist us in obtaining additional performance data. ED has extended the experiments until the next reauthorization.

Keep in mind that PEPS is most valuable as a starting point for researching institutional information. If necessary, staff may also check the source documents.

2. Institutional Assessment Model

The Department's Institutional Assessment Model provides information about possible risk factors at each school. It also contains other information that may be useful, such as comparisons to like institutions and economic factors of the local area. The institutional assessment data is only updated periodically and is considered as part of the case management process. Therefore, evaluations of this data may be included in CMIS for schools.

3. NSLDS (National Student Loan Data System)

NSLDS is the single most complete picture of aid awarded and disbursed at a school that can be obtained within the Department. NSLDS can provide summary and detail funding reports for the FFEL and Direct Loan Programs, the Pell Grant Program, and the Perkins Loan Program. The detail funding report includes student names and funds disbursed to each student, which can be useful in preparing a statistical sample. Schools and approximately 20 servicers (including the National Student Clearinghouse) send Student Status Confirmation Reports (SSCRs) to NSLDS. Thus, complete information on student attendance can be retrieved from NSLDS. 1-800-999-8219 or www.nslsdfap.ed.gov

In addition to the standard queries described above, NSLDS can be queried for specific information on a school. For example, a reviewer could identify all FFEL lenders and guaranty agencies doing business with a school during a given time frame, or demographic information such as age and dependency status could be requested from NSLDS. For such specialized queries, reviewers should consult their local systems coordinator.

When using NSLDS data, reviewers should remember that while NSLDS is the best single source of data on a particular school, it might not be the best source for each data element. Because NSLDS is a repository that collects data from many other systems, it provides a one-stop source for data that may not be easily obtainable otherwise. Reviewers should consider it a starting point for research, but should exercise caution when drawing conclusions about data contained in NSLDS and should verify the data with an independent source before using it as the basis for a program review finding. Exceptions to this would be SSCR data, Perkins Loan data, and Pell and FSEOG overpayment data for which schools are responsible for reporting to NSLDS.

Guaranty Agencies For schools that participate in the FFEL program, guaranty agencies can often provide information very similar to the information that can be obtained from the Direct Loan system. Query NSLDS to find which guaranty agencies have loans for the school and contact them to request the information.

4. Grants Administration and Payment System (GAPS)

Information about the amount of funds drawn by an institution can be retrieved from GAPS (e-Payments). This information can be used to reconcile the cash records at the school. The Reports section of GAPS allows the reviewer to request the following reports:

- Activity Report – shows the amount of cash drawn down for each “award,” or document number (including Direct Loans, if the school is a Direct Loan participant), along with individual cash request dates and amounts;
- Refunds Report – identifies the amount of funds the school has returned to the Federal programs through GAPS (but does not necessarily reflect all actual Title IV refunds); and
- Award Balances Report – summarizes the authorization, net draws, and available balance for each award.

The Payment Requests section of GAPS also contains an Authorization History section, where the reviewer can access information about the changes in the authorization level for each award.

The data on GAPS only goes back to the spring of 1998, the date of conversion from EDPMS. For fund activity prior to that, the reviewer should check EDCAPS

at <http://edcapsrpt.ed.gov:90/> Choose the “Reports” option, then under Reporting Categories choose the Education Payment Management System (EDPMS) option.

5. Fiscal Operations Report and Application to Participate (FISAP)/Campus Based-Windows

The FISAP reports are now available in electronic format for schools participating in the Campus-Based Programs. This report contains important information about the school’s management of Campus-Based Programs. In addition to information about the allocation of funds, and status of the school’s Perkins Loan portfolio for prior years, Part II, Section E also provides some student enrollment numbers.

6. Recipient Financial Management System (RFMS)

RFMS is the successor to the Pell Grant Financial Management System. As such, it can provide reviewers with information about which students received Pell Grant funds from a school, and the amounts they were paid. Therefore, this system could be used to identify the aid recipient population in a school that only participates in the Pell Grant Program.

Student applicant information is also available through RFMS, which may be helpful later in the program review process. For example, RFMS may be able to provide reviewers with students’ address information, if there is a need to conduct off-site interviews. (NSLDS has limited address information.) Also, it may be possible for schools to change Institutional Student Information Record (ISIR) information that resides in institutional databases. Based on other problems identified, reviewers may decide to test the applicant data in RFMS against what is found in institutional records.

The need to access specific student data from the system should be rare. Pell Operations Office can generate reports from the RFMS database – on a limited basis as a special request. If necessary, you can request them through PellSystems@ed.gov. There are several initiatives under way that will hopefully provide staff with easier access to RFMS data.

7. Direct Loan System

If the school being reviewed is a Direct Loan participant, reviewers may find that the Direct Loan System can provide very valuable data. The Direct Loan System data is similar to the data in the NSLDS in many ways; however it has the advantages of being more accurate, more current, and more complete. Unlike NSLDS data that can be retrieved with very short notice, some planning is

required to get Direct Loan System data. (For more information, see [PIP Memo 00-03](#).)

In addition to having more accurate and complete loan amounts, dates, disbursement information, and refund/cancellation information than NSLDS, the Direct Loan System can provide reviewers with student contact information such as addresses and phone numbers. If fraud is suspected at a school and it is a Direct Loan participant, this information could be very useful to conduct student interviews or analyze student demographics.

Another source is <http://lo-online.ed.gov>. This site provides a variety of reports at both the institution and student specific level. Information such as batch status, entrance interview results and school processing status by award year including cash receipts, ending cash balance and un-booked loans can be accessed for a particular school. The site also contains student specific data by individual loan such as Master Promissory Note status and actual disbursement data. All DL School Relations staff have access to this site and can provide assistance in running reports.

Furthermore, the Direct Loan School Relations staff maintains a limited database for schools that participate in the program. Input from the Direct Loan staff must be obtained during the case management of the school. Also, reviewers should consider requesting from the Direct Loan staff any pertinent information that might be available in their database.

B. Access to Other Case Team Records/Resources

There are other sources of information available to reviewers other than those contained on the Department's databases. Some examples are noted below.

1. Prior Reviews

PEPS research will identify the type of findings, and associated liabilities. However a review of the actual program review records, especially the correspondence, will provide more in-depth insight into past problems at the school. Even if there were no resultant liabilities, past findings may have indicated serious problems that reviewers may want to look at more closely. For example, the only finding in a prior review may have identified problems that resulted in students being under-awarded, with the resulting resolution that the institution agreed to retrain staff to prevent a reoccurrence. That review, as reflected on PEPS (one finding, no liability) may appear to have insignificant issues, but it is important to verify that the school is not still under-awarding students. Reviewers who conducted any recent reviews may provide valuable information about the school's organization and procedures.

2. Prior Audits

As with program reviews, the amount of information found in PEPS is limited to classifying the finding, and identifying associated liabilities. Reviewers are encouraged to take special note during pre-review planning of an institution's audit activity and corrective action plans. The details of the corrective action plans can be found in actual audit correspondence. While on-site, reviewers should check to ensure that these corrective action plans have been implemented. Recurrent and overlapping audit and program review findings should be noted and referenced in the program review report.

3. Complaint Profiles

Each CMT may have different methods of tracking the receipt and resolution of complaints and referrals. Ideally, there should be a method for reviewers to identify and research all recent complaints and referrals. Even if complaints have been successfully resolved, they may provide some insight into operations at the school.

4. Case Team Files

Each CMT may maintain various records that may provide additional useful information. CMT files may also contain information from accrediting and licensing bodies. For example, the CMT may keep an "institutional file" in which it files all miscellaneous information that comes to the CMT about each school (e.g., Campus-Based Allocation Letters that identify the institution's authorizations, and Perkins Loan authorizations).

5. AAAD Liaison

Reviewers should check with their respective AAAD liaison to see if there are any AAAD records of past administrative actions, appeals of FPRDs/FADs, and/or debarment or suspension actions against school officials. AAAD maintains a database of all referrals and resolutions of administrative actions, appeals, debarments and suspensions, as well as other miscellaneous information on schools that may not be recorded elsewhere. In addition, AAAD maintains copies of all settlement agreements. The AAAD liaison may also be aware of any information from OGC regarding prior actions.

AAAD staff also have access to the Lexis-Nexis system, which contains information on case law, news articles and a variety of public records, including bankruptcy petitions, corporation registrations, judgments, tax liens, uniform commercial codes (contains information on parties that have security interests, such as liens, against an individual or corporation), verdicts and settlements.

6. Contacts with Other Agencies

If there is a history of problems – whether with program reviews, audits, or complaints – other agencies may also be aware of problems of which the Department is unaware. In that case, it may be wise to check with **state licensing agencies** for complaints or other adverse institutional information on file. If related to Federal student aid, these complaints may help identify areas of program review focus. Note that state agencies may be concerned primarily with academic and instructional issues.

Similarly, **accrediting bodies** may conduct reviews of their member institutions. Reviewers might check with accrediting agency personnel to seek information on student or staff complaints and obtain copies of institutional annual reports or copies of accrediting agency reviews of member institutions. The reviewer also has the option to request these documents directly from the school while on-site. In addition, reviewers may check with State Attorney General Offices, the State Comptroller (or other offices that may oversee state grant programs), offices of consumer affairs, state or local labor department offices (to check coordination with JTPA program), and legal aid agencies regarding records of student complaints against institutions.

7. The Internet

This discussion must begin with the caveat that reviewers should be very circumspect about information gathered from the Internet and use only reliable sources. That being said, there may be some useful information on the Internet about an institution; for example, discovering through newspaper links that a school scheduled for a program review was in the process of being sold.

If the school maintains a website, the reviewer should look it over. This may provide additional information about the school, – or may reveal potential conflicts with information that the school has reported to ED. Also, a website is information that is being provided to the consumer, and should be reviewed in the same manner as printed consumer information to ensure that there is no misrepresentation.

C. Announced/Unannounced Reviews

In general, all program reviews will be **announced**, although a CMT may depart from this policy after the ACD consults with the Division Director. If a review will be announced, the institution should be better prepared to have staff and records available at the agreed-upon dates of the on-site review. In addition, information on institutional administration of the Title IV programs may be requested in advance (typically 2 - 4 week notice). Information requested should include a

complete list of Title IV recipients for the years to be reviewed, preferably in an electronic format (see Section E regarding sample selection).

For an unannounced review, the school will **not** be providing Title IV administration information in advance. Therefore, reviewers must invest additional time in pre-visit planning and information gathering. This more extensive advance planning for unannounced reviews includes an emphasis on gathering information through **indirect** sources -- everything from the precise route to the institution, to ascertaining academic schedules so as not to arrive in the midst of registration or school vacation, to preparation of the statistical sample using data available from within ED (such as NSLDS or RFMS).

D. Coordination of Review Schedules

To promote orderly management of the review process and minimize simultaneous review visits by different review teams to the same institution, review schedules must be coordinated with other agencies, as well as other offices within ED. For example, advance communication with **OIG** on review schedules can help prevent simultaneous, uncoordinated, multiple review team visits. At the same time, early coordination may provide reviewers with useful school information held by OIG or other entities.

Generally, the CMT will have already solicited information during the case management process from adjunct team members from offices such as AAAD, Direct Loan, and Quality Assurance. However, once a final decision is made to conduct the program review, it is advisable to contact those offices again before scheduling the review. For example, the Direct Loan Client Account Managers (CAMS) often visit participating schools, so it is advisable to check with that office to avoid simultaneous visits.

If a school is a Quality Assurance (QA) Program participant, the CMT must coordinate with the QA Program adjunct team member who can provide additional input to reviewers. If, after the case management process is completed, the CMT feels a program review is necessary at a QA school, the CMT must coordinate with the QA adjunct team member who can assist them throughout the review process. Since the CMTs are responsible for oversight of all Title IV institutions, QA schools are not exempt from program reviews.

Pre-review school information may be sought from each relevant guaranty agency, state licensing agency, and accrediting agency. Scheduling details may be shared to promote maximum coordination, including the possible planning of joint-agency team reviews. However, for unannounced visits, reviewers might request general information while omitting the specific review visit dates.

Note on coordination with non-federal auditors on-site: If the reviewer arrives unannounced at the school to find that an auditor will be on-site simultaneously, it is recommended that the reviewer meet with the auditor and attempt to coordinate document requests as much as possible. This should minimize inefficiencies and time delays caused by conflicting need for school documents at the same time.

E. Sample Selection

Most program reviews will entail reviewing student files to evaluate the school's procedures for awarding and disbursing Title IV funds. The basic guideline is that reviews should cover the **two most recent closed** award years. In addition, some files from the current award year should be examined. However, the CMT may decide that a shorter timeframe is appropriate.

Except for schools with very small Title IV populations (under 100 per award year), reviewers should prepare a statistical sample list in advance of the review. To identify a sample of student files to review on-site, reviewers first select from the population of Title IV recipients under review a valid **statistical sample** list. From the statistical sample, the reviewer then selects a smaller, random sample list. The file review portion of the review begins with this random sample.

The best source of information about the Title IV recipients is that institution's records. Many schools maintain databases that identify Title IV recipients for each award year. To maximize the accuracy of the sample selection, ask the institution to submit a **complete, unduplicated, reconciled list (in an electronic database format, if possible) of all Title IV recipients, by award year**. Ideally, the list should be sorted alphabetically or by social security number, and should also identify the amount of Title IV funds received in each program by each student in the applicable award year. Using a complete, unduplicated list is important because the results of the review will be more accurate, and liability extrapolations more comprehensive, if based on the entire universe of Title IV recipients.

If the reviewer is able to obtain a complete list of Title IV recipients from the school, he or she will select a statistical sample, using the [CMO Statistical Sampling Template](#) (an Excel © Spreadsheet).

This program works best with a listing provided in a spreadsheet or database electronic format, primarily because it makes sorting and eliminating duplicate records easier. However, if the school is able to provide a hardcopy listing, the statistical sampling template will function using that data. Reviewers should consult their systems coordinator if they have any questions about this sampling procedure.

If the institution is unable to submit an acceptable list, the reviewer may generate an unduplicated aid recipient report from the NSLDS that will provide a list of Pell and Loan recipients as well as dollar amounts of aid given to those recipients during a given time frame. While it may not be inclusive of a school's entire Title IV population, the NSLDS is considered the best currently available resource for the advance preparation of the statistical sample list. (Due to current NSLDS querying limitations, some of the loan recipients on the list may not match the award year designations used by the school. NSLDS queries for unduplicated aid recipients currently identify loans based on the loan period start date, so all funds disbursed for that loan will be included for the award year in which the start date fell. Accordingly, a loan with a loan period beginning date in June may have been disbursed in its entirety in the following award year, but those disbursements will still be included in the totals for the preceding award year.

From the universe of all Title IV recipients for an award year, the Statistical Sampling Spreadsheet will provide a report that identifies the random statistical sample of students from that universe. The software then identifies a further random sub-sample of 15 student records from the statistical sample group. These records are identified with an asterisk on the report generated by the software. These student records will be the initial focus of work for the review. Reviewers may find that they need to expand the statistical sample to increase the number of files to be examined.

When conducting a program review that focuses on a very specific area, reviewers may choose to generate the statistical sample using a specialized universe. For example, if the review is focused on Pell Grant recipients, the universe may include only those Title IV recipients in the applicable award year who received Pell Grant disbursements.

Additionally, there may be times when reviewers might consider selecting a judgmental sample. This may be appropriate to augment a statistical sample, or in certain cases where there is a need to focus on a particular item. Refunds may be the best example of this, because they reflect a specialized population (students who withdrew), and because any liabilities found in the review sample would not usually be extrapolated (since loan refunds must be attributed for particular students).

F. Notice of Visit Letter

The Notice of Visit Letter constitutes the official written request for access to records, required under 668.23(g), to initiate the program review process. A standard format for the Notice of Visit letter for both announced and unannounced reviews is provided in Appendix B. Reviewers must adjust the text in advance, adding information relevant to the particular school. Information to be added must include the name of the chief administrative officer, OPEID numbers, review team member(s), and award years to be reviewed.

The letter provides a general description of the scope of the program review, and lists the documents the school is requested to provide for the review. The letter also discusses the logistical needs of the reviewers, such as the need for access to copiers, and read-only access to computer databases.

After the Notice of Visit letter has been sent, reviewers should contact the institution to arrange an entrance conference to initiate the program review. It is preferable that managers of the primary offices involved in the review be present at the entrance conference. This is usually beneficial, in that it allows the reviewers to become acquainted with school officials they may be interacting with over the course of the program review, provide an overview of the review process, and discuss logistical issues (e.g., copier and computer access, record availability, etc.).

If the program review is unannounced, reviewers should present the chief administrative officer with the Notice of Visit letter (see Appendix B) upon arrival at the institution, and have copies of the letter available for distribution to other institutional officials. This letter will introduce the reviewers, inform the institution of the Department's authority to review Title IV records, and provide a comprehensive list of documents to be provided to the reviewers.

G. Incorporating the SFA Assessment in the Case Management Process

Reviewers may find the SFA Assessment useful as a tool in the case management process, and as an information resource. Therefore, reviewers should become familiar with the SFA Assessment to help determine its applicability to the circumstances of any school that is being evaluated. Then, at the reviewers' discretion, and based on the particulars of the review, decide when/if the SFA Assessment can help at some point during the review process.

1. What is the SFA Assessment?

The SFA Assessment is the starting point for any institution's quality improvement initiatives. The SFA Assessment is designed around the concept of self-assessment. An institution evaluates and analyzes its aid delivery system (the existing policies, procedures, and practices) to determine strengths and weaknesses. The benefit from this process is that the institution assesses its own systems and identifies areas that need improvement. The SFA Assessment is designed to strengthen a trusting relationship with our partners as we strive toward better service, and to improve overall performance in delivering aid and serving students.

The SFA Assessment consists of a comprehensive set of activities and questions designed to help institutions assess current operations in eight major areas in the delivery of student aid. The SFA Assessment activities complement the review items discussed in Chapter IV of this guide. The assessments were selected because they represent areas where serious deficiencies often result in significant liabilities to schools for improper use of Federal funds or cause harm to former or current students. Some of the assessments may require that the institution select a few files to review in order to complete the exercises.

Each assessment contains the major functional requirements, as well as suggested assessment steps. The assessments give an institution the opportunity to take a "snapshot" of its current Title IV management. The end result is a better understanding of not only what the requirements are, but how well they are being met at the institution and what improvements need to be made in order to meet the requirements as outlined in the regulations. The areas covered include Institutional Participation, Fiscal Management, Recipient Eligibility, Award Requirements, Disbursement, Reporting and Reconciliation, Automation, and other administrative practices. Since financial aid is an **institutional** responsibility, some assessments may need the involvement of other offices on campus to assist in the completion of the assessment.

2. Ways to Use the SFA Assessment in the Case Management/ Program Review Process

There are different ways that the SFA Assessment can be used throughout the case management/ program review process.

During the case management process/prior to the program review The motto should be Technical Assistance + Corrective Action = Better Compliance. The Case Management Teams (CMTs) may find the SFA Assessment as a useful resource as part of their case management evaluation, before a program review is conducted. For example, the CMT may determine that a program review is not warranted, but technical assistance may be needed. The CMT could then ask the school to complete the SFA Assessment and return it either to the CMT, or possibly directly to the IIS (after consulting with the IIS). The IIS could then use the information supplied by the school to determine what level of technical assistance is appropriate. This process benefits the CMT because it helps manage time and resources as we work proactively with the institutions to assist them to continuously self evaluate their operations.

Using the SFA Assessment while on-site The SFA Assessment can be an effective tool to use while on-site. If reviewers have time to spare during the review, a portion of the SFA Assessment can be used at the beginning of the review to help the reviewers and the institution determine areas that might need improvement. Technical assistance and recommendations can be provided prior

to the reviewers leaving the campus. This is a proactive approach that benefits both the institution and SFA.

Using the SFA Assessment after the review The SFA Assessment can be an effective tool to use after the review is conducted. Reviewers could have an institution complete a section of the SFA Assessment in response to the exit interview to strengthen areas of non-compliance and to determine if the findings can be resolved prior to the report being written. This would be a proactive step toward achieving a mutual respect and trusted partnership.

Further, the SFA Assessment can be an effective tool to use after the review is closed. Often times, program reviews are conducted, the findings are resolved, the reviews are closed, and the institution begins making similar mistakes in the same areas that resulted in the findings of the review. Reviewers can encourage the institution to use the SFA Assessment after the review is closed to continuously evaluate its procedures to ensure that the findings do not reoccur. If an institution uses the SFA Assessment to continuously evaluate its Title IV processes and to make improvements based on the results of the SFA Assessment activity, then the likelihood of future findings and liabilities should be reduced.

The SFA Assessment is available on the QA Website [QA Program](#).