

Session #38

Top 10 Audit and Program Review Findings

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START HERE
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Audit Findings

- Return to Title IV (R2T4) Calculation Errors
- Pell-Overpayment/Underpayment
- Return of Title IV Funds Made Late
- Verification Violations
- Overaward-Financial Need Exceeded



Audit Findings

- Return of Title IV Funds Not Made
 - Enrollment Status Not Verified Before Disbursement
 - Improper Certification of Stafford Loan
 - Student Credit Balance Deficiencies
 - Ineligible Student-Not Making Satisfactory Academic Progress
 - Repeat Finding-Failure to Take Corrective Action
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Program Review Findings

- Verification Violations
- Crime Awareness Requirements Not Met
- Student Credit Balance Deficiencies
- Return to Title IV Calculation Errors
- Return of Title IV Funds Made Late



Program Review Findings

- Entrance/Exit Counseling Deficiencies
- Account Records Inadequate/Not Reconciled
- Information in Student Files Missing/Inconsistent
- Satisfactory Academic Progress Policy Not Adequately Developed/Monitored
- Pell-Overpayment/Underpayment



Findings on Both Lists

- Verification Violations
- Return of Title IV Funds Made Late
- Return to Title IV Calculation Errors
- Pell Grant Over/Underpayments
- Student Credit Balance Deficiencies
- Satisfactory Academic Progress



Audit Findings



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Pell Grant Over/Under Payment

- Adjustments not made for change in enrollment status between terms
- Attendance not documented in all coursework counted in enrollment status
 - Modules or compressed coursework
- Incorrect Pell formula
- Inaccurate proration calculation
- Incorrect EFC
- Incorrect number of weeks/hours

Regulations: 34 C.F.R. §§ 690.62 and 690.79

Pell Grant Over/Under Payment

- Example: Lack of internal controls over file maintenance and disbursement process resulted in Pell over/under payments
- Solution: Verify student eligibility prior to disbursing aid; adjust aid accordingly; develop procedures for resolving Pell over/under payments once identified



Other Compliance Solutions

- Use correct enrollment status
- Use correct Pell Formula/Schedule
- Verify that student began attendance in all coursework
- Prorate when needed
- Assign responsibility of monitoring to ensure Pell disbursements are accurate and timely



Verification Violations

- Verification Worksheet not signed
- Untaxed income not verified
- Conflicting data on ISIR and verification documents not resolved
- Required corrections not processed

Regulations: 34 C.F.R. §§ 668.51-668.61



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Verification Violations

- Example: Incomplete Verification
 - No tax return submitted for parent even though earned income required filing
 - Incorrect number in household size
- Solution: Follow published verification procedures; ensure all required items are verified; document student files



Other Compliance Solutions

- Monitor verification process to ensure procedures are followed
- Perform your own audit of sample files
- FSA Assessments: Students
 - FSA Verification
- Use Verification Worksheet
 - School developed or ED worksheet



Overaward-Financial Need Exceeded

- No system in place to ensure overawarding does not occur
- Lack of communication between offices
- Non-Title IV funds not included with financial aid received
- Incorrect budget



Regulations: 34 C.F.R. §§ 682.204 and 685.301



Overaward-Financial Need Exceeded

- Example: Institution disbursed subsidized loans in excess of student's need
- Solution: Loans reallocated to unsubsidized loans; conduct file review; update policy and procedures; train staff



Other Compliance Solutions

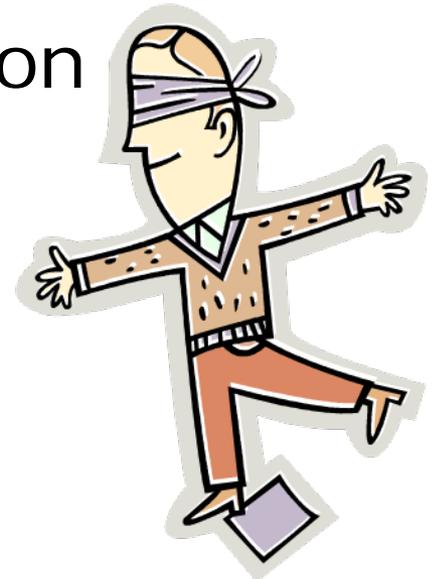
- Assign staff responsibility to monitor effectiveness of revised policies and procedures
- Perform internal review of student files
- Increase communication between offices
- Review systems/calculations to ensure compliance



Return of Title IV Funds Not Made

- Institution is not aware student has withdrawn
- No system in place to verify R2T4 calculations have been made
- Lack of communication/coordination between offices

Regulation: 34 C.F.R. § 668.22



Return of Title IV Funds Not Made

- Example: Several student files in the sample did not contain R2T4 calculation documentation even though the students had withdrawn
- Solution: Return unearned aid; implement an increase in controls over the Title IV funds; provide training and support to staff

Other Compliance Solutions

- Design processes and procedures to ensure that R2T4 funds are returned timely
- Train and assign responsibility to staff for monitoring the R2T4 process
- Develop procedures for ensuring timely communication with all offices involved
- Perform self-assessment by reviewing a random sample of student files
- Review internal system to track withdrawals

Enrollment Status Not Verified Before Disbursement

- Incorrect amount of Title IV funds awarded
- Not aware of student(s) withdrawing
- Changes in units/hours
- Leave of absence issues

Regulation: 34 C.F.R. § 668.164



Enrollment Status Not Verified Before Disbursement

- Example: Several students tested in the sample were considered part-time, however, awarded/disbursed as full-time students
- Solution: Return ineligible funds; re-train staff on enrollment requirements

Other Compliance Solutions

- Verify student enrollment status prior to disbursement
- Perform “self-audit” of student files
- Conduct monthly/quarterly meetings for all offices involved in monitoring status of students



Improper Certification of Stafford Loan

- Use of incorrect annual loan amount based on college grade level or dependency status
- Failure to prorate loans when necessary
- At least half-time enrollment not documented

Regulations: 34 C.F.R. §§ 682.603 and 685.301



Improper Certification of Stafford Loan

- Example: Additional unsubsidized loans awarded to dependent students but no documentation of PLUS denial
- Solution: Document/maintain documentation for PLUS denial; return loan funds incorrectly awarded; implement system edits to prevent certification of loans without appropriate PLUS denial flag

Other Compliance Solutions

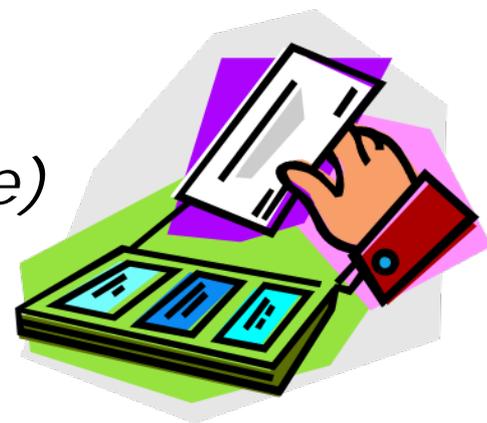
- Maintain documentation to support the award
 - Enrolled at least half-time, grade level, remaining period of study
- Monitor loan periods
- Implement system edits to prevent disbursements to ineligible students
- Perform “self-audit” of student files
- Monitor enrollment



Student Credit Balance Deficiencies

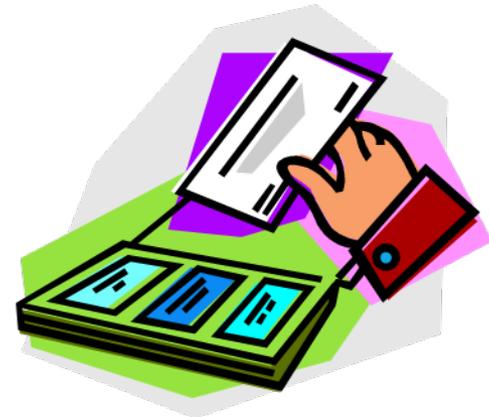
- No process in place to determine when a credit balance has been created
- Credit balances not released to students within required 14-day timeframe
- Credit balances held without student authorizations

Regulation: 34 C.F.R. § 668.164 (e)



Student Credit Balance Deficiencies

- Example: Credit balances held from 32 to 111 days without student authorizations
- Solution: Develop and implement procedures and controls to identify and release credit balances timely



Other Compliance Solutions

- Develop a process to determine when a credit balance is created
- Develop a system to track number of days remaining to release funds timely
- Understand regulations regarding minor prior year charges
 - May create more credit balances if entire program cost is charged upfront
 - *2010-2011 Federal Student Aid Handbook, Volume 4, Page 4-10 to 4-13*

Repeat Finding-Failure to Take Corrective Action

- Same finding(s) identified in subsequent audit(s)
- School failed to adequately develop, implement, and/or monitor procedures to ensure Corrective Action Plan was followed

Regulations: 34 C.F.R. §§ 668.16 and 668.174



Repeat Finding-Failure to Take Corrective Action

- Example: Repeat findings for Incomplete Verification, Incorrect Certification of Unsub Loans, Pell Grant and Loan Underawards, and Student Status Confirmation Reports (SSCRs) Submitted Late/Inaccurate
- Solution: Require FAD to review all files for eligibility prior to disbursement of aid; review sample files quarterly

Other Compliance Solutions

- Review results of Corrective Action Plan (CAP)
 - Is it working?
 - Are changes needed to improve process?
- Develop specific procedures for CAP action items
- Assign responsible person/office to ensure CAP is implemented/monitored
- Conduct student file reviews
- FSA Assessments



Program Review Findings



START HERE
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Program Review Findings

- Crime Awareness Requirements Not Met
- Return to Title IV Calculation Errors
- Return of Title IV Funds Made Late
- Entrance/Exit Counseling Deficiencies
- Account Records Inadequate/Not Reconciled
- Information in Student Files Missing or Inconsistent
- SAP Policy Not Adequately Developed and/or Monitored or Ineligible Student

Crime Awareness Requirements Not Met

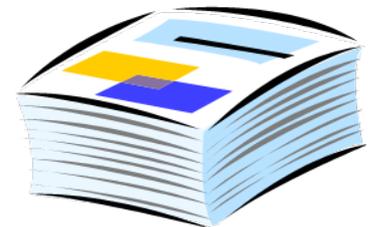
- Policies and procedures regarding campus security not adequately developed
- Annual report not published and/or distributed annually to current students/staff by the required deadline
- Failure to develop a system to track and/or log all required categories of crimes



Regulations: 34 C.F.R. §§ 668.41 and 668.46(c)(1)

Crime Awareness Requirements Not Met

- Example: Report not distributed; did not list three most recent years of statistics; no process for reporting crimes to school officials
- Solution: Fully develop all required components of the report; actively distribute the report as required



Other Compliance Solutions

- Review *Handbook for Campus Crime Reporting*
 - <http://www.ed.gov/admins/lead/safety/handbook.pdf>
- Review HEOA additional requirements
 - Emergency response, timely warnings, fire safety, missing persons
- Review *Information Required to be Disclosed Under the Higher Education Act: Suggestions for Dissemination*
 - <http://nces.ed.gov/pubs2010/2010831rev.pdf>



R2T4 Calculation Errors

- Incorrect institutional charges for the period
 - Payment period vs. period of enrollment
- Scheduled breaks not correctly determined
- Incorrect number of days counted for the period
- Incorrect withdrawal date
- Mathematical and/or rounding errors

Regulation: 34 C.F.R. § 668.22(e)



R2T4 Calculation Errors

- Example: Clock hour school used completed hours rather than scheduled hours; for student who failed to return from a LOA, used last date of LOA for withdrawal date rather than LDA
- Solution: Recalculate unearned aid and make adjustments as needed; modify policies and procedures

Other Compliance Solutions

- Pay attention to new regulations; revise procedures as needed
- Perform self-assessment by reviewing a random sample of student files
- FSA Assessments: Managing Funds
 - R2T4 module
- Use R2T4 Worksheets
 - Electronic Web Application
 - Paper



Return of Title IV Funds Made Late

- Returns not made within allowable timeframe (45 days)
- Inadequate system in place to identify/track official and unofficial withdrawals
- No system in place to track number of days remaining to return funds
- Lack of coordination between offices



Regulation: 34 C.F.R. § 668.22(j)

Return of Title IV Funds Made Late

- Example: School processed checks to return funds but failed to mail the checks within the 45-day timeframe
- Solution: Perform an internal assessment to determine why checks weren't mailed timely; revise procedures to ensure compliance; assign responsibility for monitoring the process

Other Compliance Solutions

- Periodically review processes and procedures to ensure they are compliant
 - Tracking/monitoring the deadlines
 - Ensuring timely communication between offices
- Use R2T4 on the Web
- FSA Assessment: Managing Funds
 - Fiscal Management



Entrance/Exit Counseling Deficiencies

- Entrance counseling not conducted/not documented for first-time, first-year borrowers
- Exit counseling materials not mailed to students who failed to complete in-person or online counseling
- Exit counseling not conducted for withdrawn students

Regulation: 34 C.F.R. § 682.604(f), (g)

Entrance/Exit Counseling Deficiencies

- Example: No documentation that students who unofficially withdrew completed exit counseling; school did not mail exit counseling materials to students who failed to complete counseling
- Solution: Conduct file review to determine if other students failed to complete counseling; mail required exit counseling materials; revise procedures to ensure all borrowers receive counseling

Other Compliance Solutions

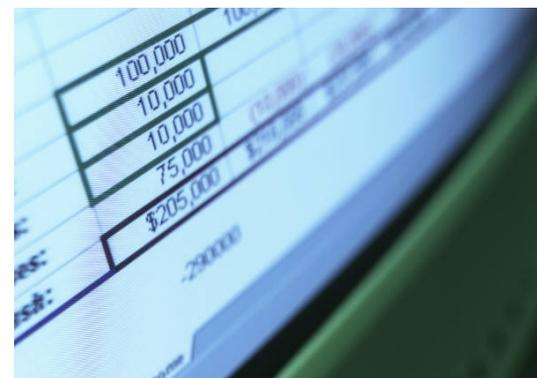
- Assign responsibility for monitoring the entrance/exit interview process
- Develop procedures for ensuring communication between Registrar, Business, and Financial Aid offices
- Provide staff training
 - FSA Coach, Module 4: Loan Counseling
 - FSA Assessments: Schools
 - Default Prevention & Management



Account Records Inadequate/Not Reconciled

- Failure to maintain financial records reflecting all program transactions
- Failure to reconcile financial aid records with general ledger and/or Department systems
- Incomplete audit trail

Regulation: 34 C.F.R. § 668.16



Account Records Inadequate/Not Reconciled

- Example: Accounting system did not provide for student ledgers showing charges, payments, and a running balance; system did not capture the point at which credit balances were created and released to students
- Solution: Purchase an accounting system that meets generally acceptable accounting principles; revise procedures to ensure accurate student accounts are maintained

Information in Student Files Missing or Inconsistent

- No system in place to coordinate information collected at different offices at the school
- Data on ISIR conflicts with institutional data or other data in student's file
- Insufficient or missing documentation needed to support professional judgment or dependency override

Regulation: 34 C.F.R. § 668.24(a), (c)



Information in Student Files Missing or Inconsistent

- Example: School application and ISIR showed student as married; tax return submitted for verification showed Head of Household; school did not resolve conflict
- Solution: Determine if tax filing status was correct; adjust aid if needed; develop policies to address conflicts

Other Compliance Solutions

- Develop adequate policies and procedures to address conflicting information
- Establish communication with other offices at the institution to identify and address inconsistent information
- Perform your own periodic 'review' of student files to determine if procedures are working
- Review all subsequent ISIRs



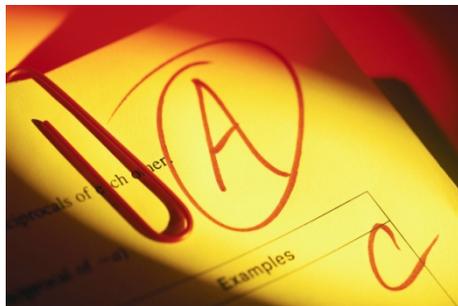
SAP Policy Not Adequately Developed/Monitored

- Missing required components
 - Qualitative, quantitative, completion rate, maximum timeframe, probation, appeals
- Policy not at least as strict as for non-Title IV recipients
- SAP standards inconsistently applied
- Aid disbursed to students not meeting the standards

Regulation: 34 C.F.R. § 668.16(e)

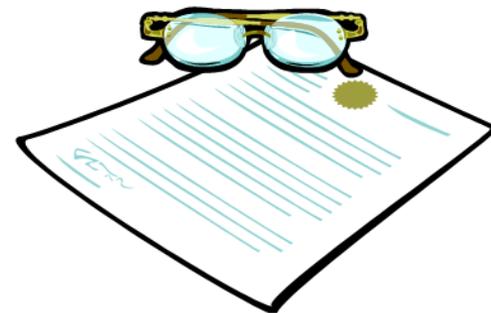
SAP Policy Not Adequately Developed/Monitored

- Example: School did not include coursework taken during a previous period of attendance in SAP determination; aid was disbursed to students not meeting SAP standards; policy allowed for first 12 credits to be excluded from SAP determination
- Solution: Return aid disbursed to ineligible students; revise policy; establish internal controls



Other Compliance Solutions

- Develop adequate SAP policy
 - Required components, remedial and repeat coursework, probationary/warning periods, appeal process
- Document each student's file to reflect eligibility for disbursements
- Note new regulations published on Nov. 1, 2010



FSA Assessments

- Self-assessment tool designed to assist schools in evaluating their financial aid policies, processes, and procedures
- Includes assessment modules on Students, Schools, Managing Funds, and Policies and Procedures

<http://www.ifap.ed.gov/qahome/fsaassessment.html>

- Home
- How to Join the QA Program
- What's New
- Training
- Tools for Schools
- FSA Assessments**
- ISIR Analysis Tool
- Management Enhancement
- Archive
- Contact Us
- Links

FSA Assessments

In collaboration with financial aid professionals, Federal Student Aid has designed management assessment modules to help schools enhance their services. The modules contain links to applicable laws and regulations. If you have questions regarding how to use this useful tool please visit our [FAQ page](#).

[This chart](#) features examples of specific compliance issues and provides recommendations for related assessments that your school may want to complete.

(ALL assessments have been updated with the new 2009-10 FSA Handbook Links!)

Students	Schools
Student Eligibility	Institutional Eligibility
Satisfactory Academic Progress	Default Prevention & Management
Verification	Consumer Information
	Automation
Managing Funds	Innovations
Fiscal Management	Policies and Procedures
Return of Title IV Funds	A Guide to Creating a Policies and Procedures Manual
FWS	
FSEOG	
Perkins Awarding & Disbursement	
Perkins Due Diligence	
Perkins Repayment	
Perkins Forbearance & Deferment	
Perkins Cancellation	



Contact Information

We appreciate your feedback and comments. We can be reached at:

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Laura Hall

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Contact Info – School Teams

Program Compliance

Robin Minor, Chief Compliance Officer
(202) 377-4358

Call the appropriate School Participation Team for information and guidance on audit resolution, financial analysis, program reviews, school and program eligibility/recertification and school closure information.

School Participation Teams – Northeast

Geneva Leon, Director – Wash DC
(202) 377-3173 geneva.leon@ed.gov

New York/Boston (Connecticut, Maine, Massachusetts, New Hampshire, Rhode Island, Vermont, New Jersey, New York, Puerto Rico, Virgin Islands)

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Rosemary Torpey - Boston (617) 289-0133
Christopher Curry—New York (646) 428-3738
Patrice Fleming - Wash DC (202) 377-4209

Philadelphia (DC, Delaware, Maryland, Pennsylvania, Virginia, West Virginia)

Nancy Gifford - Philadelphia (215) 656-6442
John Loreng – Philadelphia (215) 656-6437
Michael Frola - Wash DC (202) 377-3364

Foreign Schools

Barbara Hemelt - Wash DC (202) 377-3168

Campus Security

Clifton Knight – Wash DC (202) 377-4244

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