

School Name _____

City/State _____

Date of Review _____

Name of Team Reviewer _____

ON-SITE FINANCIAL AID REVIEW CHECKLIST

This Financial Aid Review Checklist is used by the on-site evaluation team as a sampling tool to provide information relative to the Title IV financial aid processes and practices for which the school is responsible. The U. S. Department of Education (US DE) has primary responsibility for monitoring of the Title IV programs. The more limited review intended herein is expected to rely heavily upon the various audit reports required under federal statutes and regulations, including the school's annual financial aid compliance audit(s) and federal, state or guarantee agency program reviews/audits.

Any concerns or problems noted in the completion of this checklist should be described fully in the team report.

SECTION I. INSTITUTIONAL ELIGIBILITY

- Review the most recent Program Participation Agreement and Eligibility and Certification Approval Report (ECAR). (Attach a copy of the PPA and/or ECAR as an Exhibit(s), if there are discrepancies between these documents and the ACCET database.)

Yes	No	
_____	_____	Is the institution's name and address correct?
_____	_____	Are all additional locations listed, with correct addresses?
_____	_____	Does the institution have documentation to show that US ED was notified of any name or address change or the addition of any instructional sites offering 50% or more of a program?
_____	_____	Is the Program Participation Agreement signed by the Secretary?
_____	_____	Has the Program Participation Agreement expired?
_____	_____	Is the institution provisionally certified for Title IV participation? If yes, why?

- In what Title IV programs is the institution participating?

_____	Pell	_____	FSEOG
_____	FDSL	_____	FWS
_____	PLUS	_____	Perkins

3. Is the institution on a heightened cash monitoring method of payment of Title IV programs? If yes, attach notice from the U.S. Department of Education.

Yes	No	
_____	_____	Is the institution on Heighten Cash Monitoring I?
_____	_____	Is the institution on Heighten Cash Monitoring II?

SECTION II. AUDITS AND PROGRAM REVIEWS

If an audit or program review contains substantive problems and/or significant liability, attach a copy of the report and any applicable correspondence as an exhibit in lieu of summarizing the findings.

1. Review the most recent financial compliance audit and the institution's response to any findings and recommendations. Summarize in the report any material findings, including findings resulting in financial liability that relate to more than one student. Also list any repeat findings from the prior year, or findings which reveal a pattern of errors or procedural problems (e.g. findings that are not the result of isolated error). **Note:** Annual audits must be submitted to the US Department of Education within six (6) months after the school's fiscal year end.

What period was covered by the audit? _____
 What is the school's fiscal year ending date? _____
 When was the audit filed with USDE? _____ Was it filed timely? Yes ___ No ___

2. Review any federal, state or guarantee agency review(s) and audit(s) conducted within the past three (3) years, copies of any institutional responses and closure letters, if any. Contact the appropriate federal, state or guarantee agency to determine the status of any reports that are open. Summarize any findings or concerns meeting the criteria outlined in #1 above.

SECTION III. POLICIES AND PROCEDURES

By interviewing the Director of Financial Aid or comparable staff member, determine compliance with the following areas.

1. Is there a mechanism for communication between offices of the following information:

Yes	No	
_____	_____	Changes in enrollment status or program
_____	_____	Prior attendance at other postsecondary schools*
_____	_____	Satisfactory Academic Progress (SAP) status
_____	_____	Leaves of absence (LOA), if applicable
_____	_____	Determination of Last Date of Attendance (LDA)
_____	_____	Withdrawal/termination

*For use in reviewing data from the National Student Loan Data System (NSLDS).

SECTION IV: FEDERAL COMPLIANCE

1. Does the school meet the following consumer information and administrative requirements:

Yes	No	
_____	_____	Student consumer information about financial aid, including gainful employment disclosures such as costs, student debt, and student earning information.
_____	_____	Annual Security Report
_____	_____	Annual notification to students of FERPA rights
_____	_____	Required completion/graduation rates disclosure
_____	_____	A cumulative absence policy specifying that the Date of Determination of withdrawal is no later than 14 calendar days after the LDA
_____	_____	An institutional default rate over 30% for the most recent fiscal year for which rates are available
_____	_____	If yes, does the school have a default management plan?

2. Provide the three-year Cohort Default Rates provided by the U.S. Department of Education in the past three years, including any unpublished rates for the most recent year:

FY _____ % FY _____ % FY _____ %

3. Are any of the institution's programs above the benchmarks for gainful employment identified below? If yes, attach the notice from the U.S. Department of Education.

Yes	No	
_____	_____	A debt to income ratio exceeding 12%; and/or
_____	_____	Student loan payments exceeding 30% of student income?

4. Review the institution's scholarship policy, awarding procedures, and criteria.

SECTION V. STAFFING

1. How many years relevant experience does the Director of Financial Aid or comparable staff have? _____

Yes	No	
_____	_____	Is the financial aid staff knowledgeable, effective, and adequate in size to assist the number of students enrolled?
_____	_____	Does the financial aid staff have access to resources? (Publications, consultant, servicer, professional associations, etc.)
_____	_____	Has the Director of Financial Aid or other staff received or attended any financial aid training the last two years?

SECTION VI. FILE REVIEW

1. Select a random sample of withdrawn or terminated student files (minimum 10). Review the files using the checklist below. Check for valid procedures including the use of accurate dates, appropriate and timely refunds, as well as documented evidence of refunds.
 - Accurate start date, leave of absence (LOA, if applicable), last date of attendance (LDA), and date of determination (DOD).
 - Refund calculation documented. (Institutions must calculate refunds based on ACCET Document 31 – Cancellation and Refund Policy and, if applicable, the state refund policy and then make refunds based on ***whichever policy is most beneficial to the student.***)
 - For all students who are Title IV recipients, the institution must also make the required calculation for the Return of Title IV Funds (R2T4).
 - Timely refunds – refunds made within 45 days of date of determination.
 - Evidence or documentation to show that refunds were actually made, including EFT (Electronic Fund Transfer) records, paper refund checks or a combination.

2. Review the above sampled files to determine the following:

- Enrollment agreement complete, signed, dated
- Entrance criteria documentation/certification (High School Diploma, GED, ATB)
- SAP checkpoint verification