

## **Program Review Frequently Asked Questions (FAQs)**

### **Q1. How often can an institution expect to be selected for a program review?**

**A.1.** Institutions are selected for program review in accordance with Illinois Student Assistance Commission (ISAC) Administrative Rules, 23 Illinois Administrative Code:

#### ***Section 2700.60 Audits and Investigations:***

*ISAC shall audit participating institutions of higher learning. All postsecondary institutions participating in ISAC gift assistance programs shall be audited for compliance with ISAC administered gift assistance programs on a schedule that is determined based on a risk assessment and the availability of ISAC resources. The factors used to determine when a review will be scheduled may include, but are not limited to, the following: dollar amounts awarded to the school for ISAC gift assistance programs, time elapsed since the last ISAC review, the institution's external or internal audit findings in the area of financial aid administration, ED findings or issues noted, results of investigations conducted by parties such as Inspectors General or Attorneys General, substantial increases in students awarded ISAC gift assistance, evidence that the institution is experiencing difficulty meeting the requirements of ISAC's rules or federal regulations, or issues in past audits conducted by ISAC. Secondary institutions may be audited when ISAC has a complaint indicating an audit is appropriate. Audits shall usually be announced, but ISAC reserves the right to make unannounced audits.*

### **Q2. How are institutions notified of an upcoming program review?**

**A.2:** The Program Review Announcement is communicated via e-mail to the Director of Financial Aid and the institution's president. The GAP Access contact information is updated based on information provided to the School Services Department by the institution. The e-mail is sent as a high priority with return receipt and delivery confirmation. The announcement is e-mailed at least 30 days in advance of the date the review is scheduled to begin.

### **Q3. Can a program review be rescheduled, if requested by institutional staff?**

**A.3.** Program reviews must be completed in compliance with the schedule required under ISAC Administrative rules and the Illinois Higher Education statutes.

### **Q4: Are institutions required to provide all requested document for the program review?**

**A4:** Yes. ISAC shall have access to all records related to ISAC programs. These records include, but are not limited to: admission records, financial records, registration records, attendance and enrollment records, financial aid transcripts, grades, academic transcripts and records maintained in accordance with ED verification procedures.

ISAC-Administered Gift Assistance Programs retention policy (effective July 1, 2018), records are required to be retained for three (3) years from the end of the award year the student last attended the postsecondary institution.

**Q5. Where should questions regarding the program review announcement e-mail be directed?**

**A5.** All questions are to be sent to the following e-mail address: [isac.programreviews@illinois.gov](mailto:isac.programreviews@illinois.gov)

**Q6. Will ISAC provide assistance with securing required documentation?**

**A6.** The institution is accountable for ensuring due diligence is maintained for review integrity. Institutions cannot enlist ISAC staff to provide specific step-by-step guidance related to the requested program review documents. The institutions are responsible for providing the requested program review documents.

**Q7. How will the selected program review samples be provided to the institution?**

**A7.** The selected program review samples [student name, Social Security number (SSN) and other pertinent program details] will be provided to institutions through one of two means: File Transfer Protocol (FTP) or e-mail as encrypted documents. A separate e-mail will be sent with instructions to access the encrypted samples.

It is recommended that institutions contact their IT department to ensure there are no e-mail security restrictions for attachments and encrypted documents.

**Q8. Are Institutional Student Information Records (ISIRs) received through third-party financial aid packaging software (Banner, PowerFaid, Colleague, etc.) acceptable documentation?**

**A8.** The ISIR is the document used during the program review to verify MAP eligibility certification and payment processing. Institutions cannot submit only certain pages of the ISIR based on their third-party application packaging. A complete ISIR in its original format is required for the program review. Institutions should reference the Federal Student Aid Handbook, Volume 2, School Eligibility and Operations, Record Keeping, Electronic Processes, & Privacy, Chapter 7.

**Q9. Will a finding be assessed if any of the requested documentation (items on the Program Review Materials Listing) is inadvertently omitted from the initial document submission?**

**A9.** Institutions are encouraged to ensure that all required documents (as indicated on the Program Review Materials Listing), as well as all pages of documents, are copied or scanned and included in the submission to ISAC.

A written statement numbered with the item number referenced on the Materials Listing is acceptable for the items that are not applicable to the institution's administrative process. This will be reviewed to confirm the not applicable status.

**Q10. Are paper copies of students' MAP award offers required if financial aid award announcements are provided electronically?**

**A10.** Institutions that notify their students of award packages through electronic means will be expected to provide the specific student notifications related to the program review samples.

Additionally, regardless of whether the institution provides students with a financial aid award offer electronically or via paper, MAP grants must be clearly identified on the award notification as: State of IL MAP Grant (Est), and the award notification must include the specific language required for the award year in question.

If offers are sent electronically, the language must be included on the offer. If the electronic offer contains a link to the language, the institution must have a system to track whether the student clicked the link and viewed the language. Documentation indicating the date/time the student viewed the applicable language is required for the program review.

Required school issued award notification language for each academic year is provided via the MAP Award Announcements page of the [isac.org](http://isac.org) website.

**Q11. What are the top program review findings?**

**A11.** The top findings are as follows.

1. **MAP Award Announcement:** The award notification does not comply with ISAC requirements, or copies of students' award notifications are not provided.
2. **Verification Incomplete:** Missing verification worksheets, required tax documents, and incomplete signatures or dates.
3. **Military Programs (IVG/ING):** Errors in benefit certification, course withdrawal reporting, discrepancies between actual enrollment hours on academic transcripts and certified hours, and incorrect posting of benefits on student account records.
4. **Payment Requests – Overbilling/Underbilling:** The enrollment hours reported on academic transcripts do not match the hours reported for the payment request.
5. **Payment Certification – Course Withdrawal:** The institution is unable to provide documentation of students' withdrawal dates to verify tuition and fees incurred after the add/drop period.
6. **Satisfactory Academic Progress (SAP) Student Notification:** Student notification cannot be validated or confirmed, and appeal documentation is missing.
7. **Professional Judgements (PJ)/Dependency Overrides:** The indicator flag is unchecked on the ISIR, and there is a lack of supporting documentation. Additionally, the appeal decision to approve or deny the request from the financial aid administrator responsible for special cases is missing.
8. **Illinois residency policies and procedures:** No policies or procedures were provided for program review, or the definition of dependent vs. independent student residency requirements is incorrect. Furthermore, conflicting residency information within the student file remains unresolved.
9. **MAP Reconciliation Policies and Procedures:** The documentation lacks student-specific term or year-end reconciliation processes.
10. **ISAC Administered Gift Assistance Programs Policies and Procedures:** No written policies and procedures are in place for smaller, less frequently awarded programs, despite participation in these programs.

Specific details regarding the program review process are provided via the External Compliance Program Review page, which is located within the Processes section of the Financial Aid Administrators area of the [isac.org](http://isac.org) website.

**Questions?** Questions regarding ISAC's program review process may be directed to Karisa Ott, Program Review Department by calling toll-free at 866.247.2172 (ext. 18534) or sending an e-mail message to [isac.progamreviews@illinois.gov](mailto:isac.progamreviews@illinois.gov).