

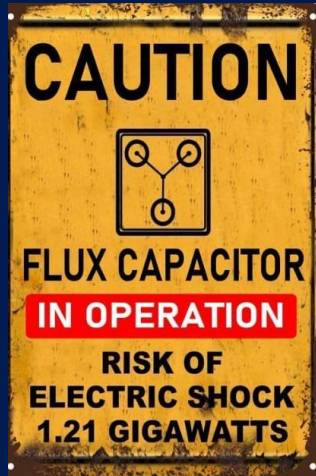
Great Scott! It's Time for an ISAC Program Review. What to Know and How to Prepare.

Presenters:

- Kim Eck, ISAC
- Sherry Schonauer, ISAC
- Amanda Bellino, DeVry University
- Michael Shields, School of the Art Institute of Chicago



Our Agenda



- Introductions
- Purpose and Intent of the ISAC Program Review
- A Roadmap of the Program Review Process
 - Steps in the Process
 - Timelines
 - Advice & Best Practices
- Common Findings
- Resources
- Suggestions for the Future ...



ISAC Program Reviews

- All colleges that participate in ISAC programs are periodically audited according to requirements defined in ISAC Administrative Rules
- Program reviews are scheduled using a risk-based assessment approach, which is defined in the rules
 - In general, schools can expect to be reviewed every 3-5 years
 - Prior to the implementation of the risk-based assessment, schools were reviewed once every 3 years, as resources allowed
- Reviews are conducted by ISAC's Program Review Department, which is part of the Finance & Accounting Division
 - Rolake Adedara, Interim Chief Financial Officer
 - Karisa Ott, Manager, Institutional Audits
 - Tania Mendoza, Institutional Compliance Examiner
 - Vurina Lee, Institutional Compliance Examiner
- Reviews are conducted remotely
 - Institutions must send requested documents electronically via a secure FTP process
 - On a limited basis, on-site reviews may be conducted

ISAC Program Reviews

- Typically covers the previous academic year, but may be expanded to other academic years if the review finds significant areas of non-compliance
- Institutional data, records, and policies and procedures related to the administration of financial aid programs are analyzed
- The timeframe for the review is dependent on the timely receipt of all review materials, staff resources and scheduling
 - Generally, 3-6 months
 - Also dependent upon:
 - Communication between institutions and ISAC staff
 - Impact of staff turnover at the institution
 - Extension requests
 - Extent of findings and deficiencies disclosed

Purpose of the Program Review

- ISAC has an obligation to help preserve the integrity of the programs it administers
- Evaluates compliance with state and federal rules and regulations
- Identifies liabilities that may be owed to ISAC and the State of Illinois
- Intended to assist schools with improving operations and services
- Non-compliance is often the result of misunderstandings or misinterpretations of rules and regulations
- Students benefit most through the effective management and delivery of limited financial aid dollars

Areas of Focus

- Institutional eligibility
- Administrative capability
- Applicant eligibility
 - Specific to each program's administrative rules
- Payment processing
- Payment and data reconciliation
- File maintenance/record retention
- Fiscal responsibility for program funds
- General security controls
- External auditor's report for the most recent years

Factors in Determining Review Schedules

- A risk-based assessment is used to determine the audit schedule
- Factors used to determine in the assessment include, but are not limited to:
 - Dollar amounts awarded to the school for ISAC gift assistance programs
 - Time elapsed since the last ISAC review
 - External or internal audit findings at the institution in the area of financial aid administration
 - U.S. Department of Education 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
 - Issues in past audits conducted by ISAC

The Program Review Process

- Notification
- Preparing for the Review/Submitting Materials
- Entrance Conference
- Review of Materials by the Compliance Examiner
- Ongoing Communication
- Conclude the Review
- Post-Review Communication and Report
- Final Procedures and Follow Up

Different School Perspectives

How each school can best work through and prepare for the Program Review process will vary based on the size and type of institution

Larger schools may have more resources and staff to dedicate to the process

Multi-campus schools may have more coordination and communication efforts to consider

Smaller schools may have staff availability and resource concerns, especially based on timing of the review

Advice & Best Practices may not work for all, but hopefully, most can be adapted to provide some value

Notification

- A call is made, typically a week prior to the review announcement, to:
 - Confirm dates of the review
 - Or reschedule as needed
 - Explain the process and materials requested
 - Review due dates
 - Address questions or concerns
- Announcement letter is sent to the financial aid director via e-mail
 - Approximately 30 days before the planned review start date
 - A copy is also sent to the institution's president
- Letter will include details on:
 - Review dates
 - Academic years/ISAC programs to be reviewed
 - Materials that should be sent to ISAC
 - Due dates for the program review materials



Advice & Best Practices



Don't Panic!

Reading into the notification
What triggered the audit - risk assessment factors,
OIG, ED or student compliances

Notify Senior Management

Explain purpose of review and type of support they can provide

Think through the timeline ISAC is requesting for the initial interview and documents

How does it impact your office as to meeting requested submission dates?
Staff engagement - who will be the point person(s) in gathering data?

Advice & Best Practices

Turn the requirements letter into a checklist

Mark it up!

Identify who is going to be responsible for each line item

Do the same with the Questionnaire

Go question by question and identify who is best versed to answer the question(s)

Advice & Best Practices

Identify and notify departments that data will be needed from outside of Financial Aid

Who are the point people/person to whom requests for data must be submitted?

Advise appropriate staff of review dates and times to ensure availability

Advice & Best Practices

BREATHE!



Preparing for the Review

- Schools must provide specified documentation to ISAC for review
 - *ISAC Program Review Questionnaire*
 - Sent with the announcement letter
 - Collects information on the institution's financial aid operations and procedures as they relate to the administration of ISAC and Title IV programs
 - Designed to provide an understanding of operational processes and the types of documents that the institution maintains for financial aid awarding and processing
 - Important to complete every question
 - If there are separate policies for different programs, be sure to provide all of them for each year being reviewed
 - If you have a Policies & Procedures manual, you can provide information directly from it
 - Can be submitted via e-mail or uploaded to the secure FTP

Preparing for the Review

- Schools must provide specified documentation to ISAC for review
 - School documents/materials (per list), include items such as:
 - School catalogs for years under review
 - Consumer information
 - Policies and procedures for awarding, verification, refunds, withdrawals, etc.
 - If separate policies or budgets for different programs, be sure to provide all of them
 - Must be detailed and school-specific
 - Satisfactory Academic Progress policies and procedure
 - Institutional reconciliation reports
 - Student Records for selected review samples, including:
 - Academic transcripts
 - SAP monitoring and Appeal documents
 - Award notifications
 - ISIRs
 - Verification documents
 - Statements of account

Preparing for the Review

- Student records reviewed
 - A random sampling is drawn from 100% of the school's payments by term for all ISAC programs in which the school participates
 - All levels of enrollment are included
 - Full-time, half-time and less than half time
- Sample size determinations
 - 2022-2023 Review Cycle - based on the total MAP dollar amount awarded in the review scope
 - For ISAC's other programs (IVG, ING, GA, MTI, PFC, etc.), a maximum of 30 students are randomly selected
 - If there are less than 30 in the population in any program, the entire population may be reviewed
 - Because there are no administrative rules for the current ECACE program (2021-22, 2022-23, and 2023-24), and it has been a federally-funded program, those student records are not subject to review

Advice & Best Practices

Set internal deadlines a week ahead of the ISAC deadline

If issues arise you have time to address

Have one or two designated points of contact that communicate with the ISAC reviewer

Funnel any department questions through that person first

Have one colleague well-versed in the requirements

To pay attention to detail

Responsible for turning the gathered documents into final **PDF files**

Rechecking the checklist

Advice & Best Practices

Use a secure shared folder where colleagues can save everything

Pre-organize your folder so it is clear where to put and find things

Have a consistent naming convention for saving gathered files

This makes putting the student records in order much easier.

Ex: # of student on ISAC list_Student Last Name_Student First Initial_Student's
School ID #

Ask questions as you have them!

Advice & Best Practices

Clearly identify and organize the files for easy reference

▼ 2022-2023 ISAC Program Review

Correspondence

Final Documents Submitted for Audit









▼ Student Documents

1_LASTNAME_FI_DSI

2_LASTNAME_FI_DSI

3_LASTNAME_FI_DSI

Supporting Documents

	██████████	2223 ISIR.pdf
	██████████	Residency 1.pdf
	██████████	Residency 2.pdf
	██████████	SOEP.pdf
	██████████	_SAP.pdf
	██████████	_Transcript.pdf
	██████████	_Ledger .pdf
	██████	_ProSam.docx

Submitting Materials for Review

- Details for submitting materials are provided in an e-mail sent with the sample selected for review
 - Lists the documents that should be provided for each program review sample group
- ISAC's secure FTP site should be used to send student files
 - Password protection is not required for FTP uploaded files (preferred method)
- Electronic documents sent to ISAC via e-mail must be password-protected if Social Security Numbers and/or other Personally Identifiable Information (PII) is included in the documents

Advice & Best Practices

Validate documents and data for submission

Based on areas that the audit will be covering

Verify all requested information is formatted per request and submitted

Verify that auditors have received all records

Ensure that all applicable records will be readily accessible

Entrance Conference

- Held on or near the start date of the review
- Conducted via conference call/virtually
 - Should include staff members who may be involved in administration of aid
 - May be held at the institution for on-site reviews
- Intended to:
 - Explain purpose and scope of the program review
 - Discuss logistics of review process and timing
 - Identify staff members who will be available to answer questions
 - Provide an opportunity for both sides to ask questions

Advice & Best Practices

**Include all who may who may be involved in
administration of financial aid**

This includes the registrar, business office, and others

Include staff who understand the institution's SAP policy

Share with the Auditors any department changes

Such as staffing or leadership and when they occurred, and anything else
that you believe they need to know

Review of the Materials

- The compliance examiner will:
 - Review materials and records for each student in the sample to confirm compliance with policies and procedures
 - Identify areas where improvements and/or corrective action may be needed
 - Contact the institution during the review process if questions arise on documents submitted
 - Likewise, institutions are encouraged to contact the examiner with questions
- Potential issues/questions noted by the examiner will be addressed as the records are reviewed and the institution will have an opportunity to provide additional information as needed



Advice & Best Practices

Contact the examiner with any questions you may have

The sooner, the better

Do throughout the review process

Via phone or e-mail

Ongoing Communication

- Due to the off-site nature of conducting the reviews, e-mails and telephone & web-based conferences are the primary means of facilitating the activities of the review between the examiner and the institution.
- The Program Review Department maintains a shared e-mail box for all program review communication.
 - isac.programreviews@illinois.gov
- During the review of the documents, an e-mail may be sent with a list of questions, and a request for additional documentation.
- The examiner will schedule a specific date and time to review this request, and answer any questions, as necessary.

Advice & Best Practices

Respond to questions as soon as possible

Be clear and thorough in both questions and responses

Provide examples and clarifying information, as appropriate

Preliminary Report

- The preliminary report is provided to the financial aid director before concluding the review
 - Identifies findings and lists additional information that may be needed
 - Summarizes financial liabilities based on the initial review
 - Addresses next steps in the process
- At this point, the findings are considered preliminary, and the institution is given the opportunity to respond to each finding
- If there are potential findings in the preliminary report that can be cleared up with additional communication or information, those should be brought up to the compliance examiner before the final report is issued

Advice & Best Practices

BREATHE!



Advice & Best Practices

Go through preliminary audit responses with auditors

Discuss until you have a clear understanding of all Findings, Recommendations and Comments.

If Findings are determined, respond with a Corrective Action Plan (CAP)

Provide actions taken to correct student records with Finding

Exit Conference

- The examiner will hold an exit or status conference at the end of the program review.
- The objective is to address the next steps in the program review process, and to summarize the initial findings.
- These findings are tentative/preliminary, and the analysis of any additional documentation submitted timely may result in changes (reductions or additions) to the findings reported.

Concluding the Review

- Final Program Review Report is issued
 - Provided to the financial aid director after finalizing the report
 - Concludes all reviews of the institution's response and supporting documentation and identifies:
 - Each final finding
 - Institution's response
 - Final program review determination
 - Any observations and recommendations
 - Summarized Final Program Review Report is provided to the institution's president

Concluding the Review

- If the final report cites any findings:
 - The institution is expected to promptly take the required corrective action on all findings
 - The institution must respond to ISAC within timeframe specified in the report, explaining the action taken for each finding
 - The institution must make payment within 60 days of the final report being issued
- In accordance with ISAC Rules, review findings may be appealed within 60 days after the final report has been issued
 - General Provisions, Section 2700.60 Audits and Investigations
 - General Provisions, Section 2700.70 Appeal Procedures

Advice & Best Practices

BREATHE!



Common ISAC Review Findings

- ❑ Award Notification Language not used or incorrect
 - Required language has wording changes
- ❑ **State of IL MAP Grant (Est)** not displayed correctly
- ❑ Illinois residency not verified (if conflicting or dependency change)
 - Illinois residency for IVG recipients (when enrolled)
- ❑ Satisfactory Academic Progress policy either not in compliance or not monitored
- ❑ Verification documentation missing
 - Wrong documents collected
 - Non-tax filer statements not collected
 - Information on verification forms differ from ISIR with no explanation or resolution



Common ISAC Review Findings

- ❑ Not reporting IVG or ING Grant benefit usage for some or all students
- ❑ Credit hours are not recorded accurately for MAP, IVG and ING Grant
 - Dollar amounts are adjusted in GAP access via override, but hours are not adjusted
 - IVG/ING benefit use data submitted not the same as account statements and/or enrollment hours on academic transcript
- ❑ Not applying proper credit to student accounts (dollars are incorrect)
- ❑ Policies and procedures for awarding, verification, residency and SAP are not complete/missing some details
- ❑ Professional judgment not marked on ISIR
- ❑ Overbilling/Underbilling
 - Adjustments not made
 - Reconciliation not complete



Suggested Actions to Avoid Future Findings

- Pay attention to additions, updates and new language in the FSA Handbook and ISAC Rules
 - Visit FSA Partner Connect and sign up to receive federal updates from the FSA Knowledge Center
 - Sign up for ISAC's e-messaging to receive state updates
 - isac.org/emessaging/
- State and federal rule changes often go into effect on July 1
- Regularly review policies and procedures
- Create good internal training systems
 - Use the FSA Training tools/resources and participate in ISAC webinars
 - Use session recordings from the annual FSA and NASFAA Conferences for staff training
- Resolve prior findings
- Avoid repeat findings



Advice & Best Practices

Create a culture of compliance

If you're doing things well every day, audits are less of a worry

Have a Quality Control (QC) process in place

Do peer reviews

Conduct your own internal reviews/audits

Advice & Best Practices

Review your Policy & Procedure manual/documents regularly

Use committees and subcommittees to develop and to evaluate

Involve Regulatory Affairs staff

Ensure any updates are incorporated

Memos of understanding vs. a comprehensive P&P Manual

Consider using third-party vendors to assist with building P&Ps

NASFAA/Blue Icon Advisors

Financial Aid Services (FAS)

Advice & Best Practices

Take a “CAP” approach as you find errors/issues throughout the year

If something went wrong, don't just fix it - take the time to understand why it went wrong in the first place

Confirm if it was isolated or a larger issue

Determine what steps can be taken to prevent in the future and document it

Short Description of Issue (like a title)

Issue: Thoroughly explain the issue that was identified

Root Cause: Why did it happen?

Resolution: What steps were taken to resolve the issue itself (usually for a specific student or student population)

Possible CAP? What can be done, changed, added, etc., to the process so that the issue doesn't happen again?

Advice & Best Practices

If waiting until it's time for a Program Review, it's too late

**Develop a realistic plan, keeping in mind resources
and possible limitations**

Small vs. large school capabilities

Return on investment vs. financial liabilities of findings

Make a commitment

Resources & References



Resources & References

- Authorized by Illinois Administrative Code
 - ISAC Rules, Part 2700, General Provisions
 - Announcement of review
 - Entrance Conference
 - Review of institutional documents, transcripts and student records
 - Preliminary Report
 - Exit Conference
 - Review of tentative findings
 - Final Report
 - [isac.org/e-library/documents/administrative-rules/2023-24-isac-rules/2700-General-Provisions.pdf](https://www.isac.org/e-library/documents/administrative-rules/2023-24-isac-rules/2700-General-Provisions.pdf)

Section 2700.60 Audits and Investigations

- a) 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.
- b) 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.
- c) The institution shall be extended an opportunity to review and comment on the auditor's preliminary findings before the final audit report is submitted to the institution's chief executive officer. Audit findings may be appealed in accordance with Section 2700.70 (Appeal Procedures).
- d) If an audit identifies gift assistance funds that were claimed on behalf of ineligible students, the funds shall be repaid to ISAC by the institution.

FSA Partners Knowledge Center

fsapartners.ed.gov/knowledge-center

https://fsapartners.ed.gov/knowledge-center

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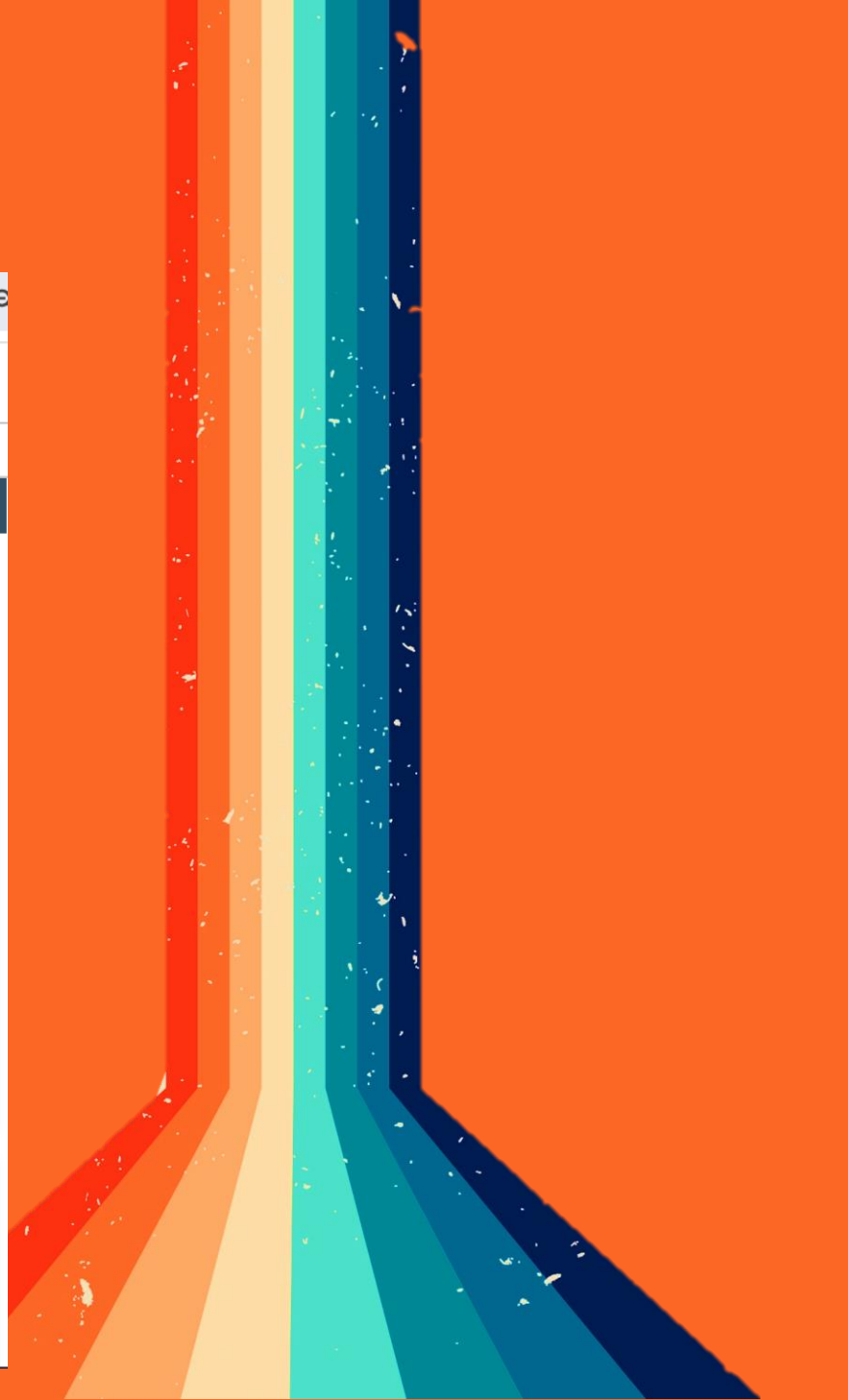
- (GENERAL-24-16) SAIG Message Class File Update**
MARCH 1, 2024
- SAIG Message Class File**
MARCH 1, 2024
- Comment Request: Revised Second Chance Pell Experiment and Prison Education Program (PEP) Data Collection**
FEBRUARY 29, 2024
- (COD-24-01) 2024–2025 COD Technical Reference (Initial) Now Available**
FEBRUARY 29, 2024
- 2024–2025 COD Technical Reference (Initial)**
FEBRUARY 29, 2024

🔗 Featured Information

- E-App and Third-Party Servicer Inquiry Form Updates
- 2023 Virtual FSA Training Conference Nov. 28–Dec. 1
- FAFSA Simplification Information**
- Prison Education Programs
- Disaster Assistance
- Technology Security Alert

⚡ Quick Reference

- FSA Handbook
- Knowledge Center FAQs
- Federal Student Aid Data Center
- Dear Colleague Letters
- Electronic Announcements
- Foreign School Updates



FSA Assessments

fsapartners.ed.gov/knowledge-center/fsa-handbook/fsa-assessments

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Federal Student Aid Handbook > FSA Assessments

FSA Assessments

Federal Student Aid (FSA) Assessments resources provide schools with a system of evaluating program compliance as well as opportunities to correct problems. FSA Assessments are listed below.

FSA Assessments

Current
Historical
?

JANUARY 4, 2024	A Guide to Creating a Policies and Procedures Manual
JANUARY 4, 2024	Consumer Information
JANUARY 4, 2024	Default Prevention & Management
JANUARY 4, 2024	Direct Loans
JANUARY 4, 2024	Federal Perkins Cancellation
JANUARY 4, 2024	Federal Perkins Due Diligence
JANUARY 4, 2024	Federal Perkins Forbearance and Deferment

JANUARY 4, 2024	Fiscal Management
JANUARY 4, 2024	FSEOG
JANUARY 4, 2024	FWS
JANUARY 4, 2024	Institutional Eligibility
JANUARY 4, 2024	Return of Title IV Funds
JANUARY 4, 2024	Satisfactory Academic Progress
JANUARY 4, 2024	Student Eligibility
JANUARY 4, 2024	Verification

Example: A Guide to Creating a Policies & Procedures Manual

KNOWLEDGE CENTER ▾ TRAINING ▾ FINANCIAL AID DELIVERY ▾ TITLE IV PROGRAM ELIGIBILITY ▾ PARTNER CONNEC

Federal Student Aid Handbook > FSA Assessments > A Guide to Creating a Policies and Procedures Manual

A Guide to Creating a Policies and Procedures Manual

SUBJECT: A Guide to Creating a Policies and Procedures Manual

This assessment outlines the minimum policies and procedures requirements for administering Title IV Aid.

[Policies and Procedures Activities At-A-Glance](#) identifies areas outlined in the law and regulations that require a written policy and procedure and also provides links to the regulations. If you identify areas requiring a corrective action, we recommend that you complete an [Action Plan](#).

Activity Bar:

- [Policies and Procedures Activity 1: Developing or Enhancing Procedures](#)
- [Policies and Procedures Activity 2: Preparation for an Audit or Program Review](#)
- [Consumer Information Activity 2: Drug & Alcohol Prevention](#)
- [Consumer Information Activity 5: Clery/Campus Security Act](#)
- [Consumer Information Activity 8: Fire Safety Reports and Student Housing](#)

Additional Links:

2023-2024 FSA Handbook Volume 2, School Eligibility & Operations, Chapter 6 ([digital version](#)); ([pdf version](#))

Print

Policies and Procedures Activity 1: Developing or Enhancing Procedures Reference: Vol. 4, Appendix B - A School's Financial Management Systems

The Policies and Procedures assessment is designed to assist **new and established schools** to develop required policies and procedures as well as evaluate and improve existing policies and procedures. Use the Policies & Procedures Activities at a glance document (link provided on the bottom of the last page) to determine the areas that you would like to evaluate.

The Department strongly recommends that participating schools create policies and procedures manuals that cover the entirety of the school's participation in the FSA programs. We believe that an all-inclusive policies and procedures manual is critical to establishing internal controls and ensuring effective and efficient operation of a school's FSA programs. We encourage those individuals responsible for participating in a school's business operations to join with their colleagues in financial aid in creating a comprehensive FSA policies and procedures manual for the school.

We encourage those individuals responsible for participating in a school's business operations to join with their colleagues in financial aid in creating a comprehensive FSA policies and procedures manual for the school.

All employees must receive a clear message from senior administrators that control responsibilities must be taken seriously. Employees must understand their own roles in the internal control system, as well as how individual activities relate to the work of others. They must have a means of communicating significant information to those administrators who can affect change and by having policies and procedures in place you can ensure this critical function is met.

Control activities—Control activities are the policies and procedures that help ensure a school's administrative directives are followed. They help guarantee that the actions necessary to reduce risk are carried out. Control activities occur throughout an

Part one: Update or make available the following:

Activity	Completed Y/N	Comment
Catalog/Brochure for the Institution and Student Institutional General Consumer Information (Right-To-Know)		
If a new school to Title IV, make available certificate of attendance to Title IV Training. If your school needs to meet a provisional program participation agreement [PPA] requirement criterion above, you must ensure that the Owner/President/CEO (or their high-level school official designee) and Financial Aid Administrator attend and complete Fundamentals of Federal Student Aid Administration training. Both the Owner/President/CEO (or their high-level school official designee) and the Financial Aid Administrator must complete the online course and attend all four and one-half days of the virtual workshop to fulfill the requirement.		
<ul style="list-style-type: none"> Please note that these two officials may attend different workshops; they do not need to attend the same session. The requirement must be completed within twelve months of the execution of the Provisional PPA 		
Title IV, HEA Policies and Procedures which should include at a minimum the following items as well as those identified in the current FSA Handbook, Vol 4, Appendix B Admission Process and Student Eligibility:		
<ul style="list-style-type: none"> Satisfactory Academic Progress Return of Title IV, HEA Funds (R2T4) Process Official and Unofficial Withdrawals Process Refund Policy State Student Grievance Procedure Attendance Credit Balances Admission to Institution and to Academic programs - Student Eligibility 		

Example: FSA Assessment Tools for SAP

SUBJECT: Satisfactory Academic Progress

This assessment provides you with an opportunity to review and evaluate your procedures regarding Satisfactory Academic Progress (SAP). If you identify areas requiring corrective action, we recommend that you complete an [Action Plan](#).

Activity Bar:

SAP Activity 1: [SAP File Review Worksheet](#)

Additional Links:

[2023-2024 FSA Handbook, Volume 1, Chapter 1 \(digital version\); \(pdf version\)](#)

[2023-2024 FSA Handbook, Volume 2, Chapter 3 \(digital version\); \(pdf version\)](#)

[Office of Postsecondary Education \(OPE\) Program Integrity Questions & Answers - Satisfactory Academic Progress](#)

[Satisfactory Academic Progress \(SAP\) Guidance: A Series of Q & As \(2020 FSA Training Conference presentation\)](#)

[ANN-21-07 \(SAP/R2T4 webinar recording addressing recent regulatory changes\)](#)

For reference, the table below lists the regulatory areas related to SAP. The left column shows the title of the regulatory section and summarizes the main content of some of the sections. The middle column includes a link to each regulatory section in the [Electronic Code of Federal Regulations](#) and any related guidance posted in the [Knowledge Center](#). Where applicable, the associated assessment activity is listed in the third column.

SAP Regulations

Section Title	Regulations	Assessment Activity
Standards of administrative capability 34 CFR 668.16(e)	34 CFR 668.16(e) ↗	
SAP as part of student eligibility 34 CFR 668.32(f)	34 CFR 668.32(f) ↗	
Satisfactory Academic Progress Policy 34 CFR 668.34	34 CFR 668.34 ↗	SAP Activity 1: SAP File Review
Required SAP Policy elements include		

SAP ACTIVITY 1 SAP File Review Worksheet

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Instructions:

This activity is divided into two parts. For Part A, select a random sample of 10 students from the same cohort/category and determine if they are meeting the school's standards for SAP for each student. For Part B, select a random sample of 10 students that the school identified as not making SAP and determine if the school followed the SAP policy as published and applied for each student. For more detail on requirements of SAP and assessing SAP progress, see Volume [1 of The FSA Handbook](#).

Part A (Students identified as meeting school SAP policy):

Student Name: SSN:

Award Year Reviewed:

	Monitoring Point 1	Monitoring Point 2	Monitoring Point 3	Monitoring Point 4
Student's GPA (or comparable assessment measured against a norm)	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
Student's Pace of Progression (quantitative measurement), if required	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
Maximum Timeframe	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>

NASFAA Resources

https://www.nasfaa.org/Resources



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Compliance Engine

Self-Evaluation Checklists

Policies & Procedures Builder

Compiled Title IV Regulations

CREATE A FINANCIAL AID TIMELINE

PUBLICATIONS

RESOURCES FOR STUDENTS AND PARENTS

STUDENT AID REFERENCE DESK

SHOP

★ ADD TO FAVORITES

Compliance Resources For Financial Aid Professionals

Strengthen The Framework, Make The Repairs

Whether your financial aid office needs a check-up, tune-up, or overhaul, you have all the compliance tools you need to get the job done. NASFAA's compliance resources provide timely and practical insights to help you stay up-to-date on ever-changing regulations and best practices.



Not sure where to begin?

Our exclusive, member-only* resources can help you determine the quality and integrity of your institutional operations. Start by visiting the [Compliance Engine](#) to assess your office's needs. Then implement changes and updates using the tools below. To receive ongoing compliance updates by mail and email, edit your [myNASFAA profile](#) and select the opt-in box for compliance resources.

AskRegs	Personal assistance with regulatory or compliance questions.
Blue Icon Advisors, NASFAA Consulting*	Blue Icon Advisors will match you with a consultant to evaluate your needs and address your specific short-term

ISAC Resources

The top of the ISAC website features a dark teal navigation bar. On the left is the ISAC logo (Illinois Student Assistance Commission). To the right are menu items: COUNSELORS, E-LIBRARY, FAA'S (highlighted with a red box), and GAP ACCESS. A search bar is located on the far right. Below the navigation bar is a large image of a man in an orange sweater assisting a student at a computer.

A horizontal breadcrumb trail below the main image reads: ISAC Gift Assistance Programs Other Programs Processes ISAC Administrative Rules E-Library Partner Training. Below this, a second breadcrumb trail reads: Home Financial Aid Administrators.

Financial Aid Administrators

By choosing from these topics, Financial Aid Administrators, Business Officers, and other school personnel have fingertip access to a centralized source of information and financial aid guidance concerning ISAC's programs, processes, and resources.

- ISAC Gift Assistance Programs
- Other Programs
- Processes
- e-Library

FAA Quick Links



FAA Message Board

The FAA Message Board is updated each week.

NEW 2024-25 NACIP April 30

NEW State Legislation

NEW MAP night resuming 2.28

NEW 2024-25 All file layout specifications PDF and Excel files

NEW Reminder on March 11

Home > E-Library >

E-Library for Partners

1. Partner E-Messages & Newsletters

This month's e-Messages and the monthly ISAC Update and Communique

2. Partner Training

ISAC training and event calendars and online registration

3. Applications

Scholarship, grant, and loan repayment/forgiveness applications

4. Administrative Rules

Current and previous year's ISAC Rules, Proposed Rules if applicable

5. ISAC Governing Board: The Commission

Meeting schedules, Commissioner biographies, Agenda Books

6. Manuals & Handbooks

Common Manual, Federal Student Aid Handbook, Counselors and Mentors Handbook, Handbook of Illinois Postsecondary Institutions

7. Outreach Events

Outreach events calendar of college fairs, financial aid nights and FAFSA Completion workshops

8. Electronic Tools

Specifications for loan and grant payment processing, software program links

9. Applying for Financial Aid - Completing the FAFSA

When to apply, important dates, dependency status, professional judgment, FAFSA on the Web, sample forms

Partner E-Messages And Newsletters

Partner Training

Applications

Administrative Rules

The Commission

Outreach Events

Electronic Tools

Applying For Financial Aid

Federal Information

Job Aids And Reference Materials

Press Releases And State Legislative Update

Research, Policy Analysis & Statistics

Advisory Groups

ISAC Administrative Rules

isac.org/e-library/administrative-rules

[Home](#) › [E-Library](#) › [Administrative Rules](#)

2023-24 ISAC Rules

Select order in which to view the 2023-24 ISAC Rules:

[Listed Alphabetically](#)

[Listed by Program Type/Topic](#)

2023-24 ISAC Rules – Listed Alphabetically

- [Administrative Wage Garnishment \[Part 2722\]](#)
- [Adult Vocational Community College Scholarship Program \[Part 2745\]](#)
- [AIM HIGH Grant Pilot Program \[Part 2766\]](#)
- [Alternative Loan Program \[Part 2721\]](#)
- [Americans With Disabilities Act Grievance Procedure \[Part 1400\]](#)
- [Child Welfare Student Loan Forgiveness Program \[Part 2769\]](#)
- [College Planning Act \[Part 2774\]](#)
- [College Savings Bond Bonus Incentive Grant \(BIG\) Program \[Part 2771\]](#)
- [Community Behavioral Health Care Professional Loan Repayment Program \[Part 2753\]](#)
- [Community College Transfer Grant \(CCTG\) Program \[Part 2740\]](#)
- [Displaced Energy Worker Dependent Transition Scholarship Program \[Part 2746\]](#)
- [Federal Family Education Loan Program \(FFELP\) \[Part 2720\]](#)
- [General Provisions \[Part 2700\]](#)
- [Golden Apple Scholars of Illinois Program \[Part 2764\]](#)
- [Grant Program for a Child Raised by Grandparent \[Part 2738\]](#)
- [Grant Program for Dependents of Correctional Officers \[Part 2731\]](#)

Proposed Rules And Amendments

[2023-24 ISAC Rules](#)

[2022-23 ISAC Rules](#)

[2021-22 ISAC Rules](#)

[2020-21 ISAC Rules](#)

[2019-20 ISAC Rules](#)

[2018-19 ISAC Rules](#)

[2017-18 ISAC Rules](#)

[2016-17 ISAC Rules](#)

[2015-16 ISAC Rules](#)

[2014-15 ISAC Rules](#)

[2013-14 ISAC Rules](#)

[2012-13 ISAC Rules](#)

[2011-12 ISAC Rules](#)

[2010-11 ISAC Rules](#)

[2009-10 ISAC Rules](#)

[2008-09 ISAC Rules](#)

[2007-08 ISAC Rules](#)

[2006-07 ISAC Rules](#)

[2005-06 ISAC Rules](#)

FAAs – Processes Section

isac.org/faas/processes/external-compliance-program-review/

NEWSROOM
ABOUT ISAC >

ISAC Gift Assistance Programs Other Programs **Processes** ISAC Administrative Rules E-Library Partner Training

Home > Financial Aid Administrators > Processes > External Compliance Program Review >

External Compliance Program Review

Overview
 Program Review Process
 Purpose
 Announcement of Program Review
 Required Documentation
 Entrance Conference
 Review of Materials
 Program Review Communication
 Preliminary Program Review Report
 Exit Conference
 Final Program Review Report
 Institution Documentation & Security
 Program Review Department Systems of Internal Control
 Most Common Findings
 Contact Information

Overview
 The Illinois Student Assistance Commission (ISAC) is responsible for the oversight of colleges that administer ISAC gift assistance programs. This includes ensuring program integrity through eligibility, fund disbursement, and payment reconciliation. The review of an institution's financial aid

Most Common Findings
 The most common program review findings include:

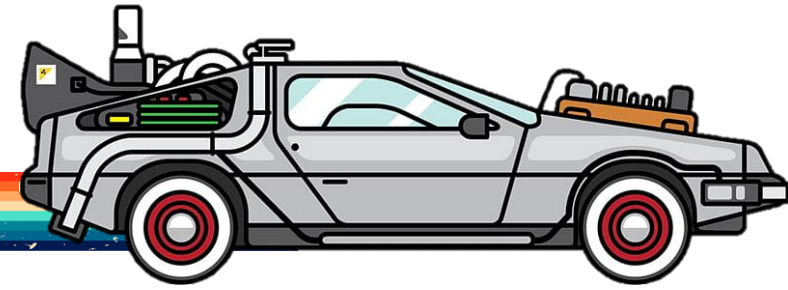
- Approved MAP Award Letter language not used
- Verification of Financial Aid Application incomplete (missing worksheets, tax documents etc.)
- Illinois residency not verified
- Reconciliation issues
- Overbilling/Underbilling
- Satisfactory Academic Progress policy either not in compliance or not monitored
- IVG/ING benefit use data submitted not the same as account statements and/or enrollment hours on academic transcript

All of the common findings listed above are addressed within pages for each gift assistance program in the FAA area on this website and are summarized in a [Program Review Frequently Asked Questions document](#).

Contact Information
 Program Review Department - F & A Division
 Illinois Student Assistance Commission
 1755 Lake Cook Road
 Deerfield, IL 60015-5209
 866.247.2172 ext. 18563
isac.programreviews@illinois.gov

MAP Electronic Proce
 MAP Advising Data C
 MPCH Adjustments
 (COVID: Spring 2020)
 NON-MAP Programs A
 (COVID: Spring 2020)
 ING Grant Electronic
 IVG Electronic Proce
 ECACE Electronic Pro
 GA Electronic Proce
 MTI Electronic Proce
 NES Electronic Proce
 Social Work Scholars
 Electronic Processing
 SETTW Electronic Pro
 Gift Assistance Budge
 External Compliance
 State Comptroller's Website

Suggestions for the Future



- For Schools
- For ISAC
- For Discussion



ISAC Program Review Contact Information

Program Review Department,
Finance & Accounting Division
Illinois Student Assistance Commission
1755 Lake Cook Road
Deerfield, IL 60015-5209

Questions may be directed to:
ISAC.ProgramReviews@illinois.gov



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