



STEPS TO
TAKE WHEN
HAVING A

PROGRAM REVIEW



01. **KEEP DEFAULT RATE
UNDER 10%**

Consider diligent loan counseling and utilizing third parties to lower your rate.



02. **LOWER
DROPOUT RATES**

Develop an enrollment process that ensures the students are well informed of all resources the school provides and puts the student in a position to succeed.



03. **TAKE IMMEDIATE CORRECTIVE ACTION
ON STATE, ACCREDITING AND ANNUAL AUDITS TO
THE DEPARTMENT OF EDUCATION (DOE)**

Repeat and unresolved findings from audits are issues that can trigger program reviews.



04. **MONITOR YOUR COMPOSITE SCORE
THROUGHOUT THE YEAR**

Poor financial performance has been cited as a leading factor in recent years as to why schools have closed. Maintaining a composite score of 1.5 or higher is essential to not only limiting your exposure to a program review but ensuring the school can operate properly.



05. **MONITOR YOUR
90/10 SCORE**

Schools that rely more on financial aid are more likely to get a program review. A program review centered around 90/10 is an example of a focused review.



06. **AVOID UNPAID
CREDIT BALANCES
AND UNPAID
REFUNDS (R2T4)**

These liabilities need to be paid timely. We suggest having a system where two people are responsible for calculating and paying with sign offs to document completion.



07. **CONDUCT SYSTEMATIC REVIEWS** OF YOUR
WEBSITE AND CONSUMER INFORMATION TO STAY
CURRENT ON ALL REQUIRED DISCLOSURES

Review <https://ifap.ed.gov/ifap/> updates weekly to stay ahead of regulatory updates and changes.



08. **PARTNER WITH THIRD PARTIES** WHO WORK WITH
MULTIPLE SCHOOLS TO CREATE BEST PRACTICES IN ALL AREAS

Auditors, third party servicers, cybersecurity/website administrators, marketing companies, collection agencies and outside consultants are areas to review if you are partnering with industry experts.



09. **KNOW YOUR REGIONAL CONTACTS**
AT THE DOE AND ESTABLISH RELATIONSHIPS

If you add a program, move a location, have an ownership change, are up for recertification or are celebrating a successful accreditation renewal, we suggest knowing your representatives at the department who navigate these areas.



10. **WORK WITH AN EXPERT**

If you're unsure where to start, consider working with an expert to help avoid or prepare for a program review.

For more information about Title IV services or Program Reviews, visit <https://www.sikich.com/accounting-tax-audit/audit-assurance/audits/title-iv/>

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