

**10 Common Questions Schools  
have About Federal Program  
Reviews**

blueicon  
advisors  
NASFAA CONSULTING

**ISFAA**  
Indiana Student Financial  
Aid Association  
Annual Conference  
March 11 - 13, 2026

1

**Materials and Limited Rights**

Training participants agree not to distribute materials to anyone who is not an active participant at the time the materials are shared. Permission to share materials outside of the training session must be obtained in writing from Blue Icon Advisors.

2

# 10 Common Questions Schools Have About Federal Program Reviews

Presented March 12, 2026



3

ISFAA 2026 Conference

blueicon  
advisors  
NASFAA CONSULTING




## 10 Common Questions Schools Have About Federal Program Reviews


4

ISFAA 2026 Conference

blueicon  
advisors  
NASFAA CONSULTING

## 1. What is a Program Review?

-  Required by Law
-  Evaluates the School
-  Focuses on Title IV Provisions




5

ISFAA 2026 Conference

blueicon  
advisors  
NASFAA CONSULTING

## 2. What are the Types of Program Reviews?

- General Assessment Reviews
- Focused Program Reviews
- Joint Program Reviews
- Compliance Assurance Reviews



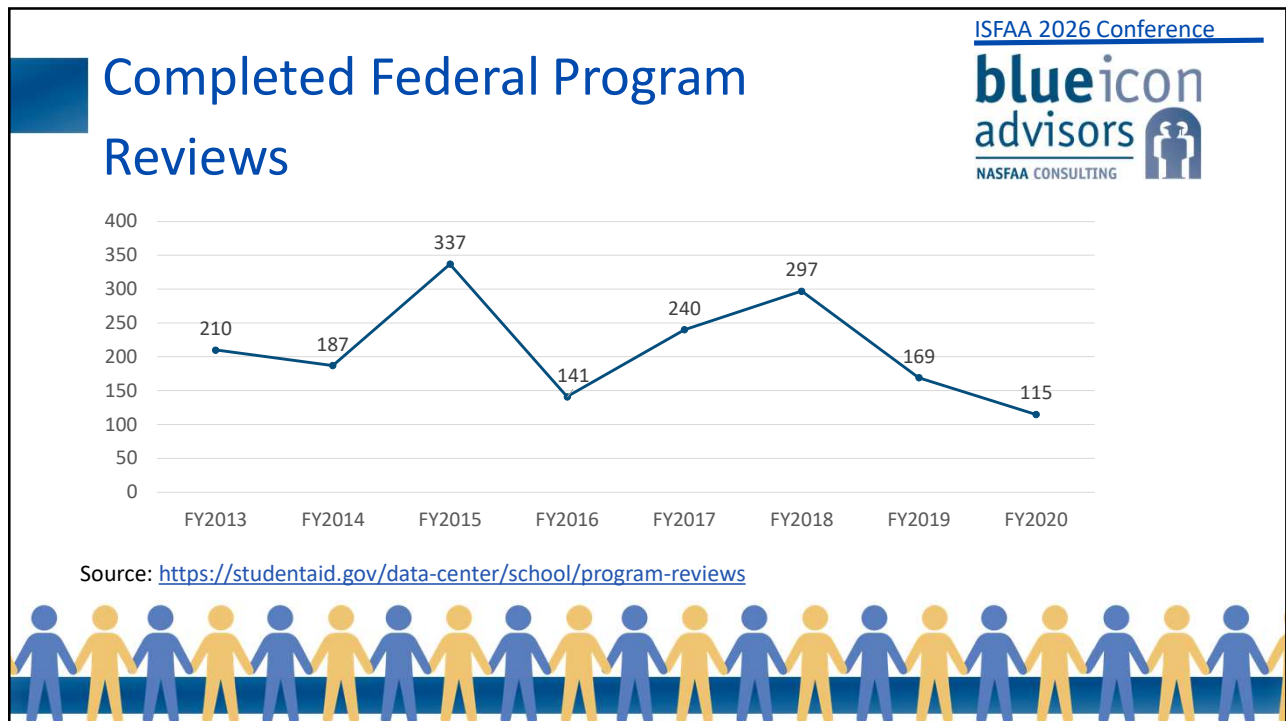
6

# 10 Common Questions Schools Have About Federal Program Reviews

Presented March 12, 2026



7



8

# 10 Common Questions Schools Have About Federal Program Reviews Presented March 12, 2026

ISFAA 2026 Conference

## 3. Who Performs Program Reviews?

blue icon  
advisors  
NASFAA CONSULTING

U.S. Department of Education  
Federal Student Aid  
Program Compliance Office  
School Eligibility Service Group  
School Participation Division

9

ISFAA 2026 Conference

Denver  
Chicago  
Philadelphia

blue icon  
advisors  
NASFAA CONSULTING



10

ISFAA 2026 Conference

**blue icon**  
advisors  
NASFAA CONSULTING

## 4. Why Does ED Conduct Program Reviews?

Schools must demonstrate they effectively manage the federal funds entrusted to them.


11

ISFAA 2026 Conference

**blue icon**  
advisors  
NASFAA CONSULTING

## 4. Why Does ED Conduct Program Reviews?

|  |  |
|--|--|
| To strengthen the administrative capability and financial responsibility provisions of participating schools | Identify weaknesses in Title IV administration |
|  | Recommend actions to strengthen compliance     |
|  | Define the financial cost of non-compliance    |
|  | Refer for administrative action                |



12

## 5. When and How Often Will My School Have a Program Review?

Every school participating in Title IV aid programs will have a program review on a “systematic basis.”



© 2026 Blue Icon Advisors & NASFAA

13

13

## 6. What Might Trigger a Program Review at My School?

ISFAA 2026 Conference

High Cohort  
Default Rate

Fluctuations in  
Pell Grant and/or  
Direct Loan Volume

Issues Reported by  
Outside Agencies

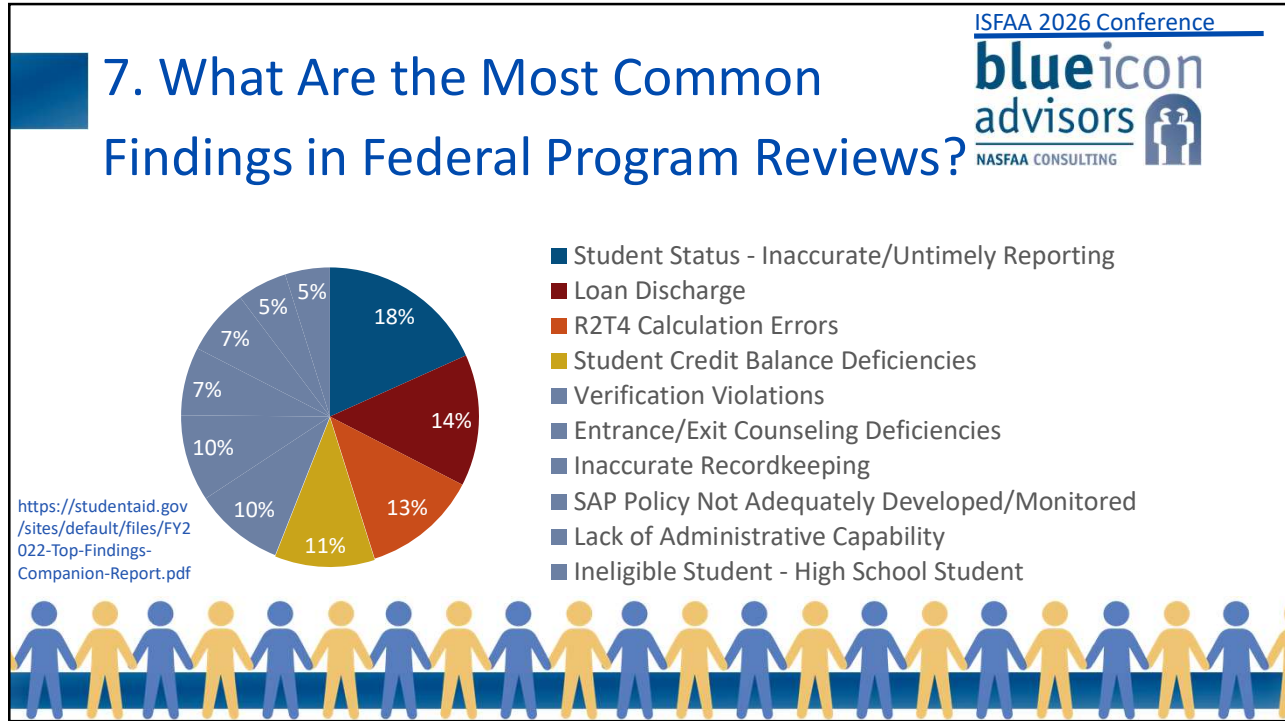
High Annual Dropout  
Rates

Risk of Failing to  
Comply with  
Administrative  
Capability Provisions

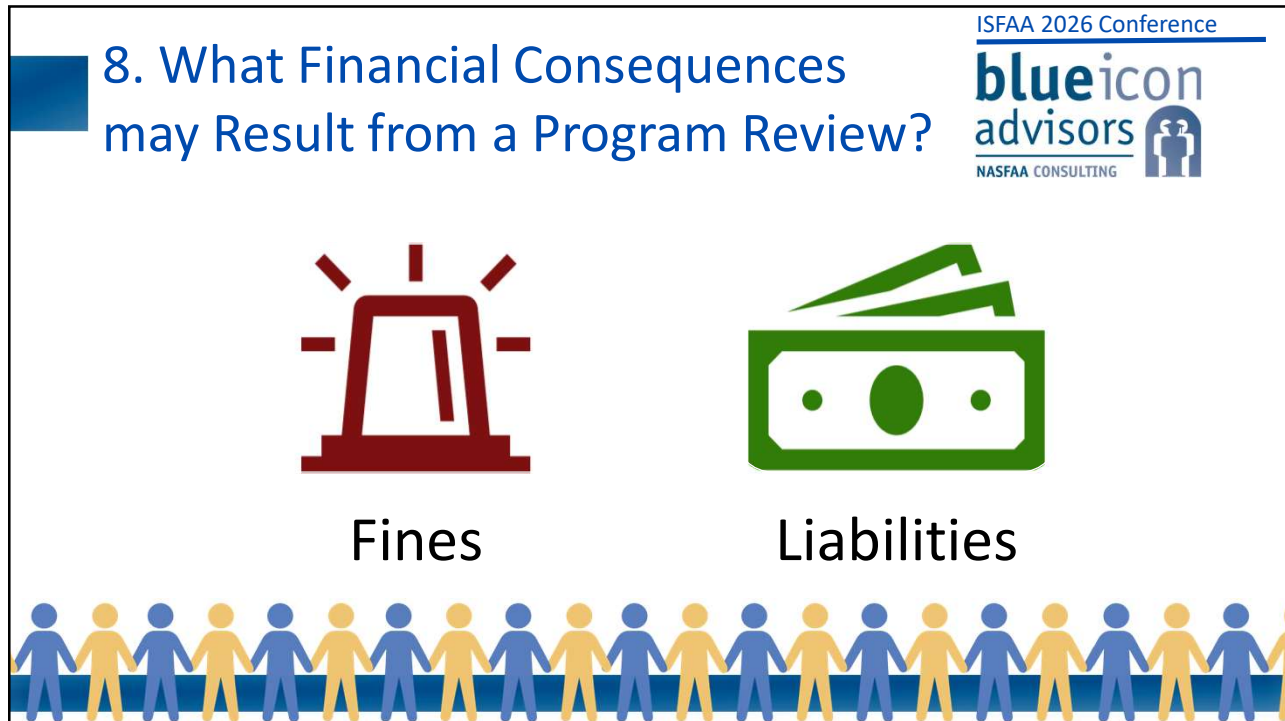
Risk of Failing to  
Comply with Financial  
Responsibility  
Provisions



14



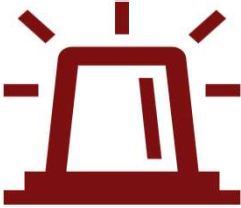
15



16

ISFAA 2026 Conference  
blueicon  
advisors  
NASFAA CONSULTING

## 8. What Financial Consequences may Result from a Program Review?




Gravity of offense

Nature of violation

Size of institution

**Fines**



17

ISFAA 2026 Conference  
blueicon  
advisors  
NASFAA CONSULTING

## Types of Fines

**Clery Act**

- Campus security and crime statistics reporting

**IPEDS**

- Completion of regular surveys

**Drug-Free Schools**


- Develop drug and alcohol abuse prevention
- Distribute information to students and employees

**Other Fines**

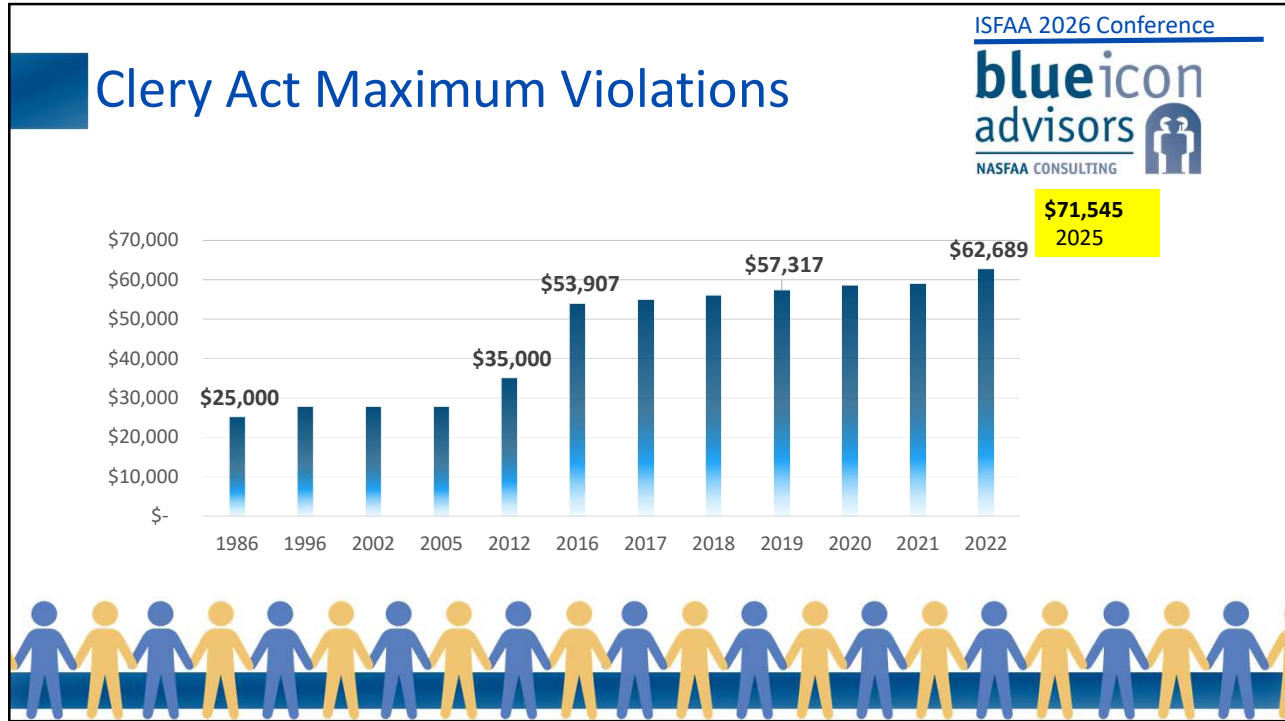
- Fiduciary standards, fraud, late/unmade refunds, etc.

**False Claims Act & Qui Tam**

- Actions to defraud the government



18



19

## Sample Fines from FY2020

ISFAA 2026 Conference  
blue icon advisors  
NASFAA CONSULTING

Fines Imposed by Federal Student Aid in FY 2020

| OPE-ID   | School Name                                     | City          | State | School Type | Referral Reason         | Imposed Fine Amount | Imposed Fine Date |
|----------|---|---------------|-------|-------------|-------------------------|---------------------|-------------------|
| 04238900 | Beauty School, (The)                            | Mountain Home | AR    | Prop        | IPEDS Nonsubmission     | \$2,000             | 12/17/2019        |
| 04253700 | Sacramento Ultrasound Institute                 | Sacramento    | CA    | Prop        | IPEDS Nonsubmission     | \$4,000             | 12/17/2019        |
| 00131200 | University of California, Berkeley              | Berkeley      | CA    | Pub         | Campus Security         | \$2,350,000         | 9/9/2020          |
| 04221700 | ZMS The Academy                                 | Los Angeles   | CA    | Prop        | IPEDS Nonsubmission     | \$7,000             | 12/17/2019        |
| 04083400 | Cambridge College of Healthcare & Technology    | Delray Beach  | FL    | Prop        | Campus Security         | \$98,000            | 10/2/2019         |
| 03433400 | New Concept Massage & Beauty School             | Miami         | FL    | Prop        | IPEDS Nonsubmission     | \$10,500            | 12/17/2019        |
| 04182200 | Hawaii Medical College                          | Honolulu      | HI    | Prop        | IPEDS Nonsubmission     | \$15,000            | 12/17/2019        |
| 00172300 | Meadville Theological School of Lombard College | Chicago       | IL    | Priv        | IPEDS Nonsubmission     | \$10,500            | 12/17/2019        |
| 02582200 | Guy's Academy Hair, Skin & Nails                | Shreveport    | LA    | Prop        | IPEDS Nonsubmission     | \$3,500             | 12/17/2019        |
| 04204000 | Aspen Beauty Academy - Laurel                   | Laurel        | MD    | Prop        | IPEDS Nonsubmission     | \$4,000             | 12/17/2019        |
| 00677100 | College for Creative Studies                    | Detroit       | MI    | Priv        | Campus Security-Part 86 | \$103,000           | 9/18/2020         |
| 00227400 | Jackson College                                 | Jackson       | MI    | Pub         | Campus Security-Part 86 | \$95,317            | 6/11/2020         |
| 00297400 | University of North Carolina - Chapel Hill      | Chapel Hill   | NC    | Pub         | Campus Security         | \$1,500,000         | 6/26/2020         |
| 02324400 | Allstate Hairstyling & Barber College           | Cleveland     | OH    | Prop        | IPEDS Nonsubmission     | \$6,000             | 12/17/2019        |
| 00354500 | Baylor University                               | Waco          | TX    | Priv        | Campus Security         | \$461,656           | 9/3/2020          |
| 01231500 | Cornish College of the Arts                     | Seattle       | WA    | Priv        | IPEDS Nonsubmission     | \$6,500             | 12/17/2019        |
| 00915700 | WyoTech   | Laramie       | WY    | Prop        | IPEDS Nonsubmission     | \$3,500             | 12/17/2019        |

<https://studentaid.gov/data-center/school/fines-and-findings>

20

## 8. What Financial Consequences May Result from a Federal Program Review?



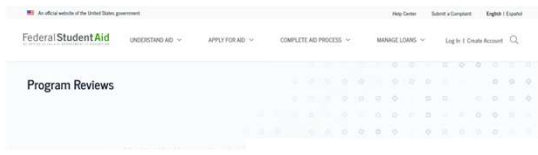
Liabilities

There is no limit to the amount of liabilities ED may impose on a school.



21

## Published Program Reviews



Future FFRDs will be posted regularly. Below are the Final Program Review Determination Letters issued in:

- FY2020
- FY2019
- FY2018
- FY2017
- FY2016
- FY2015
- FY2014
- FY2013

Final Program Review Determination letters with liabilities  
<https://studentaid.gov/data-center/school/program-reviews>

To access all documents associated with focused-Cery Act reviews, visit the "Cery Act Reports" page. To locate Final Program Review Determinations from completed third...



22









## 9. How Long Can My School be Held Responsible for Compliance Violations?

© 2026 Blue Icon Advisors & NASFAA
23

23

|   |   |   |
|---|---|---|
|  |  |    |
|  |  | <p style="font-size: x-small;">© 2026 Blue Icon Advisors &amp; NASFAA</p> <h2>10. How Can My School Prepare for a Program Review?</h2> <hr style="width: 20%; margin: 10px auto;"/> |
|  |   | <span>24</span>   |

24

## Contact Blue Icon

- Tammy Harrison, Director of Client Services
- [harrisont@nasfaa.org](mailto:harrisont@nasfaa.org)
- 202-785-7289



25



26

# 10 Common Questions Schools Have About Federal Program Reviews

Presented March 12, 2026



27