

# The PPE Hybrid Audit: *Compliance During The Modern Era*

**Private Postsecondary Education**

Presented by: Art Wells



**STATE COUNCIL OF HIGHER  
EDUCATION FOR VIRGINIA**

# The Hybrid Audit

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- **Who?**
- **What?**
- **Why?**
- **How?**



# Who Conducts the Audits?

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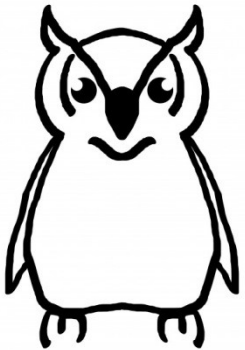
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# Compliance Audit – Who is Audited?

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All postsecondary schools certified by SCHEV to operate in the Commonwealth of Virginia

- Degree Institutions
- Non-Degree Institutions



# When are Schools Audited?

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Schools are selected for audit based upon:

- **Date of Previous Audit**
- **Newly certified schools = 6-18 months after initial certification**
- **Other Reasons:**
  - **Student complaints**
  - **Issues with Accreditor**
  - **Issues with Department of Education**
  - **Issues brought to PPE Attention**



# Why are Schools Audited?

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To review, inspect and investigate compliance with:

- **Statutory Authority:**

§ 23-276.1 - § 23-276.1 6 of the  
**Code of Virginia**

- **Title of Regulations:**

**8 VAC 40-31 et.seq.**



# How are Schools Audited?

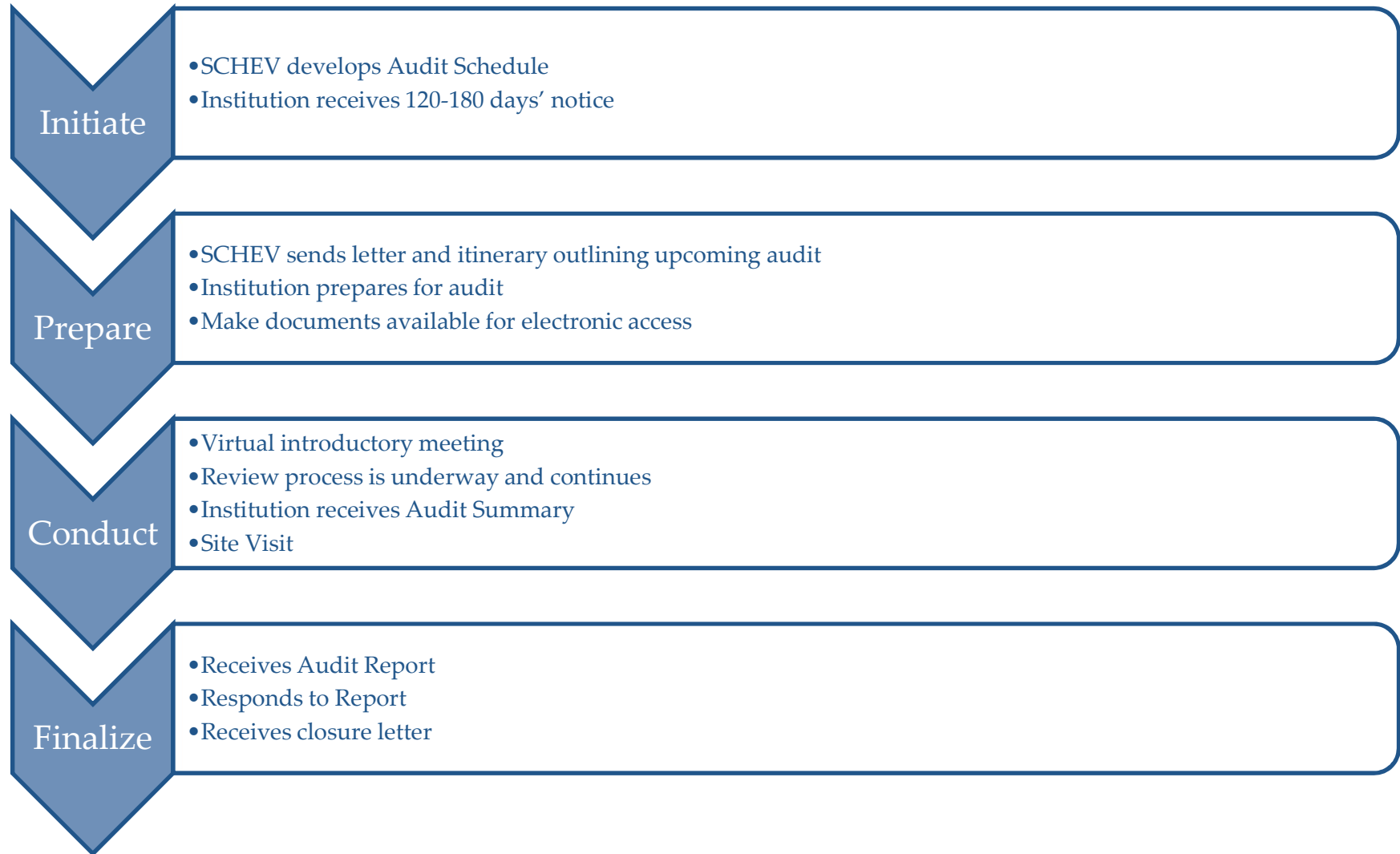
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Methods are optional

- On-site
- Virtual
- Hybrid



# The Hybrid Audit Process





# What is the Audit Process? - Step 1

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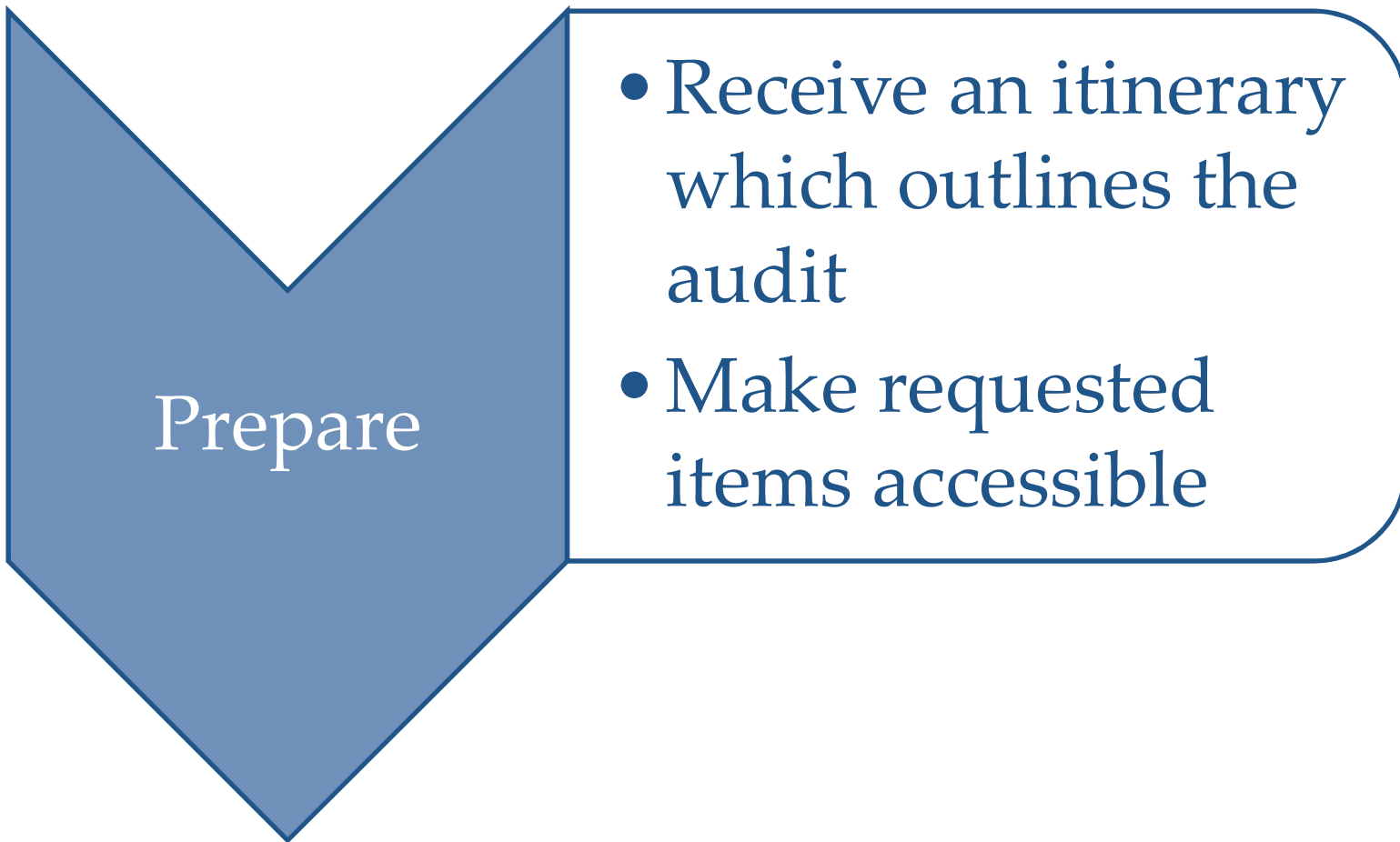
Initiate

- SCHEV develops an audit schedule
- Institution gets 120-180 days' notice



# What is the Audit Process? – Step 2

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# What is the Audit Process? – Step 3

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Conduct

- Virtual introductory meeting
- Compliance Investigator conducts audit
- Site visit and presentation of audit summary



# What is the Audit Process? – Step 4

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# What are the Common Findings? (1)

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Audits typically find that:

- **The Enrollment Agreement is insufficient**
  - Updated 7/1/2022
  - Read through for quotations
- **Withdrawn students are not accurately documented**
  - Degree Institutions
  - Non-Degree Institutions
- **No student transcripts**

# What are the Common Findings? (2)

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## Schools typically:

- **Have an incorrect refund policy**
  - Degree – Weeks/days
  - Non-degree - Hours
- **Do not have a truth-in-lending statement**
- **Do not have a written policy that instructional faculty are accessible outside of class**
- **Have not completed required SCHEV forms**
- **Instructors' files lack credentials**

# How to Prepare

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- Ensure all categories in the PPE Portal are complete with current documents
- **Read itinerary**
- **Read regulations**

# Compliance Hybrid Audit

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