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Introduction

The Pennsylvania State Grant and Special Programs (SGSP) Department has been committed for decades to helping schools, colleges, universities, and all other organizations (hereinafter referred to as “institutions”) accurately and effectively administer state and federal financial aid programs. As stewards of taxpayer dollars, the Pennsylvania Higher Education Assistance Agency (PHEAA) aims to ensure that all state and federal financial aid programs are administered in compliance to all applicable laws, regulations, and program policies. Questions regarding the PA SGSP program review process should be directed via email to ProgramReview@pheaa.org, via phone at 717-720-2740 Option 1, or via mail to:

PHEAA – Program Review
PA State Grant and Special Programs
1200 North 7th Street
Harrisburg, PA 17102-1444

I. Overview

A program review is conducted to assess the capability of institutions to manage financial aid programs administered by PHEAA on behalf of the U.S. Department of Education (ED) and the Commonwealth of Pennsylvania. The primary focus of a program review is typically the PA State Grant Program; however, institutions not participating in the PA State Grant Program will also be reviewed if they participate in any other programs administered by PHEAA. All programs that an institution participates in will be included in the review, as deemed necessary by PHEAA. Institutions that participate in these additional programs are required to adhere to the specific guidelines associated with the program including, but not limited to, maintaining records according to the program’s retention policy. The additional programs subject to review are often referred to as Special Programs and include the following:

- PA National Guard Educational Assistance Program (EAP)
- PA Partnerships for Access to Higher Education (PATH) Program
- Chafee Education and Training Grant (Chafee ETG) Program
- PA Ready to Succeed Scholarship (RTSS) Program
- PA Institutional Assistance Grants (IAG) Program
- PA Act 101 (Act 101) Program
- PA Blind or Deaf Higher Education Beneficiary Grant (BDBG) Program
- PA Targeted Industry Program (PA-TIP)
- PA State Work-Study Program (SWSP)
- PHEAA Federal Work-Study On-Campus (FWS-ON) Program
- PHEAA Federal Work-Study Program Community Service (FWS-CS) Program
- PA Postsecondary Educational Gratuity (PEGP) Program
- PA National Guard Military Family Education Program (MFEP)
• PA Fostering Independence Tuition Waiver (FosterEd) Program

For additional information surrounding these other PHEAA-administered programs, check out PHEAA.org/training.

II. Types of Reviews

PHEAA conducts five main types of program reviews and audits. In all reviews and audits, PHEAA will evaluate the following:

- General institutional eligibility
- Program administration
- Student eligibility
- Student financial aid files
- Student admission, academic, registration, and attendance records
- Fiscal administration records

### Types of Reviews

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<th>Type of Review</th>
<th>Characteristics of the Review</th>
<th>Sample Size</th>
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| Routine Program Review | • Reviews are conducted approximately every 2 to 3 years.  
• Institution policies and practices are reviewed, as well as a sample of student accounts, for one designated award year.  
• A routine review takes approximately 1-3 days to complete.  
• Findings report is mailed to the President of the institution and the Director of Financial Aid is provided with a copy. For SWSP community employers, the letter is mailed to the primary contact of the organization.  
• The institution must respond to and resolve any findings within 30 days of the initial report or request an extension. This includes remitting all required refunds.                                                                                                                                                                                                                                                                                                                                 | PA State Grant: 30-45 files. For institutions with less than 30 files, 100 percent of the files are reviewed.  
Special Programs: 10 records per program or 100 percent of all records if there are less than 10. If only special programs are being reviewed, PHEAA staff may adjust the sample size. |
| Follow-Up Review       | • Review is conducted the following year after a previous review yielded a PA State Grant error rate that exceeded the acceptable limit (4 percent) or four or more administrative findings were uncovered.  
• PHEAA reserves the right to conduct a follow-up review regardless of the error rate or number of findings.  
• Institution policies and practices are reviewed, as well as a sample of student accounts, for one designated award year.  
• Review takes approximately 1-3 days to complete.  
• Findings report is mailed to the President of the institution and the Director of Financial Aid is provided with a copy. For SWSP community employers, the letter is mailed to the primary contact of the organization.  
• The institution must respond to and resolve any findings within 30 days of the initial report or request an extension. This includes remitting all required refunds.                                                                                                                                                                                                                                                                                                                                 | PA State Grant: 30-45 files. For institutions with less than 30 files, 100 percent of the files are reviewed.  
Special Programs: 10 records per program or 100 percent of all records if there are less than 10. If only special programs are being reviewed, PHEAA staff may adjust the sample size. |
### Probationary Review
- Review is conducted for institutions that, for a second year in a row, have an error rate greater than 8.9 percent.*
- Institution policies and practices are reviewed, as well as a sample of student accounts, for one designated award year.
- Review takes approximately 1-3 days to complete.
- Findings report is mailed to the President of the institution and the Director of Financial Aid is provided with a copy. The institution must respond to and resolve any findings within 30 days of the initial report or request an extension. This includes remitting all required refunds.

| PA State Grant: 30-45 files. For institutions with less than 30 files, 100 percent of the files are reviewed. |
| Special Programs: 10 records per program or 100 percent of all records if there are less than 10. If only special programs are being reviewed, PHEAA staff may adjust the sample size. |

### Institution Closing Review
- Review conducted when an institution closes or loses eligibility. Scheduled by PHEAA within 30 days of closure date or loss of eligibility date.
- More than 1 academic year may be reviewed, if applicable, and the timeframe of the review will be determined by the number of files.
- Findings report is mailed to the President of the institution and the Director of Financial Aid will be provided with a copy. For PA SWSP community employers, the letter will be mailed to the primary contact of the organization.
- The institution must respond and resolve any findings within 10 days of the initial report or request an extension. This includes making all required refunds.

| 100 percent of student files are reviewed, including both PA State Grant and all Special Programs. |

### Audit
- An audit is conducted when there is reported or suspected fraud at the institution. The audit may be unannounced.

| Sample size is at PHEAA’s discretion but typically includes 100 percent of student files, including both PA State Grant and all Special Programs. |

### NOTE: *All Special Program findings are excluded from error rate calculations and are considered administrative findings. The error rate is calculated for PA State Grant only. (For more information, refer to PA State Grant Handbook.)*

## III. Program Review Process

### A. Pre-Review

Prior to scheduling the program review, PHEAA will review the institution and determine the type and scope of the review. Once determined, PHEAA Compliance staff will contact the institution, schedule the review, and submit a notification letter to the institution with the final date and time (see “Appendix A” on page 10 and “Appendix B” on page 13).

#### i. Frequency & Scope

A program review cycle is from September 1 through August 31, and routine program reviews are conducted approximately once every 2 to 3 years. Typically, one award year is reviewed during the program review cycle. There are some instances where more frequent program reviews may be required (e.g., follow-up review, audit, etc.). In these cases, institutions are advised of the reasons for the increased frequency of reviews. Compliance staff may request records from prior years that are still within the retention scope. Compliance staff may also extend the size and the scope of the review. Every institution must keep the records in accordance with each program’s guidelines/handbook/certification procedures.
Example:
During the 2021-22 program review cycle, PHEAA will conduct reviews of the 2020-21 Award Year records, unless otherwise noted.

ii. Sample Size

The sample size will vary depending upon the type of review being conducted. The chart in II. Types of Reviews summarizes the five types of reviews conducted by PHEAA and the approximate sample size for each type of review. The sample size for any program is at the final discretion of PHEAA staff.

iii. Scheduling & Notification

The primary contact as denoted by the institution will receive a telephone call and/or email approximately 30 to 60 days in advance of the program review. At this time, the date is flexible and, if necessary, can be changed to accommodate institution schedules. The primary contact for the institution should notify other officials that will be involved in the program review (e.g., Business Office, Act 101 Director, Registrar, Payroll etc.) of the tentative date of the review and confirm their availability during the scheduled time.

Following the telephone call or email, the primary institution contact will receive a notification letter via email confirming the date and time of the program review (see “Appendix A” on page 10 and see “Appendix B” on page 13). At this time, the primary institution contact may be asked to supply specific documents to PHEAA prior to the scheduled review (see “Appendix A” on page 10). Additionally, the institution is strongly encouraged to have completed any PA SGSP reconciliation rosters or reports prior to the review date.

iv. Institutional Readiness

In the notification letter, the institution is provided with a list of materials that must be sent to PHEAA’s Compliance staff within 5 days of notification of the visit. These items, if applicable, must be emailed and include the following:

- Institutional tuition refund policy
- Academic Progress policy
- Identification of online or hybrid courses
- List of fees used for the Educational Cost Collection form (Cost on Web)

To ensure that all reviews are conducted smoothly and efficiently, PHEAA recommends that institutions develop and communicate a set of standard operating procedures for the review. Specifically, institutions are encouraged to:

- Notify appropriate personnel and offices of the dates and times of any scheduled visit
- Develop a contact list for PHEAA staff
- Establish appropriate office space for Compliance staff to conduct their work
- Notify campus security of external visitors by providing the name of the PHEAA reviewer along with their affiliation to ensure campus access
- Establish information sharing protocol
- How information, especially non-public personal information (NPPI), is to be delivered
- Acceptable turn-around time between data requests and provision to Compliance staff
- Preferred format for information delivery
B. Site Visit

PHEAA’s Compliance staff will arrive at the designated location on the dates of the scheduled program review or audit. In the case of an audit, Compliance staff will arrive unannounced at the institution and explain the purpose of their visit. The amount of time needed for the on-site review depends upon the type of review being conducted and the number of student files being reviewed. The on-site review consists of three parts, including the entrance interview, student file review, and exit interview.

i. Entrance Interview

The program review will begin with an entrance interview. All institution officials who are directly associated with the programs being reviewed should be invited to attend the interview. The entrance interview includes the following components:

- The purpose and scope of the review will be discussed.
- The pre-review materials that were emailed to the reviewer (see section above on Institutional Readiness) will be discussed, including questions or concerns about institution policies and procedures.
- Participating officials will be provided with a list of students that will be included in the file review.
- A list of institution contacts associated with the program review should be provided to PHEAA staff.
- Any questions that participating officials may have will be addressed.

ii. Student File Review

Each file is reviewed to determine compliance with program regulations and policies. PHEAA staff may request the following documents as applicable:

- Student contracts, enrollment agreements or registration forms
- Evidence of admissions criteria such as high school diploma or General Education Diploma (The type of admission category must also be provided.)
- Completed admissions and financial aid forms
- Class schedules and attendance records
- Documentation of costs and fees
- Documentation of Academic Progress
- Documentation supporting the student’s withdrawal date
- Refund calculation worksheet
- Student need analysis documentation
- Student account cards or ledgers and any pertinent supporting documentation
- Bank accounts established for PHEAA programs
- Documentation of student refund checks being negotiated
- Student timecards or sign in sheets
- Student payroll vouchers

Potential findings are discussed with institution officials during the on-site visit. Prior to the exit interview, the institution officials will receive a “Findings Sheet” identifying each potential finding (see “Appendix C” on page 15). Institution officials will be given an opportunity to respond to the findings and concerns prior to the exit interview. If additional time is needed to research a particular finding, institution officials may be given up to an additional week to conduct research and respond to the potential findings.
iii. Exit Interview

The on-site review will conclude with an exit interview. It is important for all institution officials who were involved in the program review to be invited to attend the exit interview. The exit interview will include the following components:

- The purpose and scope of the review will be reiterated.
- All unresolved findings will be discussed.
- The Compliance Coordinator may also recommend changes to policies, procedures, or financial aid processes.
- The timeline for the institution to provide any outstanding information and documentation will be explained.
- Any questions that institution officials may have will be addressed.

In addition, the institution is advised of the requirements to resolve the findings and of all potential liabilities. The institution is advised that they must not adjust student records in the PA State Grant system in response to findings; this will be completed as part of the process maintained by PHEAA staff. There might be additional requirements for some programs after the program review is completed. The institution must monitor follow-up communications from PHEAA staff and respond promptly when requested. If a Program Improvement Plan (PIP) is necessary, this will be discussed.

C. Post Site Visit

i. Initial Findings Report

The initial findings report, which will list the findings, the appropriate regulatory reference, and the action the institution is required to perform to resolve the findings, will be mailed to the institution approximately 30 days following the on-site visit. The report will be mailed to the president of the institution, and a copy will be mailed to the financial aid director or the primary contact for the program review. For SWSP community employers, the letter will be mailed to the primary contact of the organization.

Every institution will receive the initial report even if no errors or findings were identified during the program review.

Except in the case of a “no error review,” the institution is required to respond in writing to each finding in the report. The Compliance Coordinator will advise the institution that it must respond within 30 days (or 10 days for an institution closing review) and that all refunds are to be made via the report process. If any money was refunded from the institution, the institution must specify in their correspondence how the money was returned to PHEAA (e.g., check, wire transfer, etc.).

Schools wanting to pay via paper check must write the check payable to PHEAA and return it with the form that was enclosed in the findings report. The school should write, “Program Review Refund” on the memo section of their check. This information should be mailed to:

PHEAA – Program Review  
1200 North Seventh Street  
Harrisburg, PA 17102-1444

An institution may be granted an extension if they are not able to respond within the established time period. Institution officials must contact PHEAA Compliance staff to request an extension.
ii. Secondary Responses

The Compliance Coordinator will review the institution's response to the initial program review findings. If additional action is needed, a secondary correspondence letter is sent to the institution. Secondary correspondence letters will continue until all findings are resolved.

iii. Closing the Review

When the institution has satisfactorily responded to all the findings from the program review and made all required refunds, a closing letter is sent to the primary institution contact. Once the program review is closed, the outcome will be evaluated. If any further steps are required from the institution, they will be notified in writing in 30 days.

IV. Program Review Outcomes

A. Findings

Once the program review results are finalized, any instance of an error and non-compliance in the institution's awarding and administrative processes for PHEAA-administered programs will be listed as a finding in the initial report. After the program review closing letter is sent to the institution, the findings are categorized by PHEAA staff. For the PA State Grant Program, all student-level findings that require a refund from the institution to PHEAA will be included in the institution's error rate calculation. All other findings for the PA State Grant Program will be considered administrative findings. For the PHEAA-administered Special Programs, all findings (i.e., financial or non-financial) are considered administrative findings. For more details regarding the error rate calculation, refer to the Program Review Chapter of the PA State Grant Program Handbook. Additional information on the most common administrative findings is included in the Handbook and the Program Guidelines for the appropriate program.

B. High Error Letter

After the program review is closed, the results are recorded and further reviewed by PHEAA. If an institution has an error rate exceeding acceptable range for PA State Grant (refer to PA State Grant Handbook for error rate ranges and calculation) or has four or more administrative findings during a program review, a high error letter is mailed to the institution detailing next steps.

C. Program Improvement Plan

An institution may be requested to complete a Program Improvement Plan (PIP) if the program review results in four or more administrative findings or PA State Grant error rate of nine percent or more. A PIP is a mechanism to identify institutional administrative weaknesses and to provide support for the institution. The PIP provides a roadmap for improvement and may encompass the activities of several different offices within the institution. PIP requirements are detailed in “Appendix D” on page 17.
Appendix A

Notification Letter
Dear Name:

This letter is to confirm that PHEAA has scheduled a program review at your institution beginning on <Date>. <Name>, Senior Compliance Coordinator, will be at your institution at 9:00 a.m. on that date. The scope of the review will primarily focus on <CCYY-YY> Academic Year records. The review will include approximately 30 to 45 student files and will encompass the PA State Grant and Special Program records.

Your school is required to provide access to all PA State Grant and Special Program records. This program review will evaluate the following:

- General institutional eligibility
- Program administration
- Student eligibility
- Student financial aid files
- Student academic, registration, and attendance records; and
- Fiscal administration records

Please inform members of your staff who are responsible for the PA State Grant and Special Programs (including Act 101 staff, if applicable) of the dates of the program review. Officials from the financial aid office, business office, and registrar’s office must be available to answer questions during the program review and should also be present during the entrance and exit interview.

Your cooperation throughout the program review process will be appreciated. If you have any questions regarding the program review, please call this office at 717-720-2740.

Sincerely,

James A. Snyder
Manager, Institution Compliance & Eligibility
PA State Grant and Special Programs

oe.monthYYN
List of Attachments
PHEAA Program Review

The following items must be forwarded to PHEAA via email to <<EMAIL>>@pheaa.org within 5 days of receipt of this correspondence:

- Tuition refund policy
- Satisfactory academic progress policy
- Policies regarding online or hybrid courses
- List of fees used for Cost on the Web form

A list of student files to be reviewed will be provided to school officials at the entrance interview. These files must include the following documentation as applicable:

- Student contracts, enrollment agreements, or registration forms
- Evidence of admissions criteria such as high school diploma or General Education Diploma
- Completed admissions and financial aid forms
- Class schedule and attendance records
- Documentation of satisfactory academic progress
- Documentation supporting the student's withdrawal date
- Refund calculation worksheets
- Student need analysis documentation
- Student account cards or ledgers and any pertinent supporting documentation
- Documentation of student refund checks being negotiated
Appendix B

PA State Work-Study Program Notification Letter
Dear Name:

This letter is to confirm that the Pennsylvania Higher Education Assistance Agency (PHEAA) has scheduled a program review of your institution beginning on <DATE>. <Name>, Compliance Coordinator, will conduct an entrance interview via phone at 9:00 a.m. on that date. The scope of the review will primarily focus on <CCYY-YY> Academic Year PA State Work-Study Program funding. The review will include all the students that received an award at your place of employment. You will need to provide all the required documents within 10 business days of the entrance interview via email to <<EMAIL>>@pheaa.org.

You are required to provide access to all the student employment records.

A list of student files to be reviewed will be provided to institution officials at the entrance interview. These files must include the following documentation as applicable.

- Signed student employment contract with hourly wage
- Job description with name of the position, detailed duties, and responsibilities
- Timesheets with hours worked per day signed by the supervisor
- Direct supervisor information
- Payroll vouchers

Please inform members of your staff who are responsible for the PA State Work-Study Program of the dates of the program review. Officials handling any aspect of the students’ employment must be available to answer questions during the program review and should also be present during the entrance and exit interview.

Your cooperation throughout the program review process will be appreciated. If you have any questions regarding the program review, please call this office at 717-720-2740.

Sincerely,

James A. Snyder
Manager, Institution Compliance & Eligibility
PA State Grant and Special Programs

JAS/mc
oe.monthYYN
Appendix C
Findings Sheet
FINDING(S)

INITIAL MANAGEMENT RESPONSE
School officials should include appropriate documentation to support their position and/or resolve the Coordinator’s concern.

The school official’s signature confirms that this information was presented to you by the Compliance Coordinator. Your signature does not necessarily constitute agreement with the finding.

Signature __________________________ Date __________________________

Title __________________________
Appendix D

Program Improvement Plan
# State Grant & Special Programs Improvement Plan

## School Data

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<th>School Name:</th>
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Finding:

## Program Improvement Plan Details

Provide detailed narrative responses on additional pages to the items listed below:

- Provide a specific description of the institutional plan to address the issues cited above including the starting and ending dates of the activities.
- How will the indicated actions mitigate the citation listed?
- What safeguards are being implemented to prevent future reoccurrences of this issue?
- What institutional offices will be involved in the Program Improvement Plan (PIP)? Define each of their roles in the process.
- Provide a copy of the section of your school Policies and Procedures Manual that indicates the changes made as a result of this PIP.

## School Contacts

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<th>Lead Contact:</th>
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Return Completed PIP by __________

Return this form via email to programreview@pheaa.org, or via mail to:

PHEAA – Program Review/SGSP
1200 North 7th Street
Harrisburg, PA 17102-1444

The documentation that you provide on the PIP will be reviewed during your next scheduled Program Review by Compliance Staff.
Created in 1963 by the Pennsylvania General Assembly, the Pennsylvania Higher Education Assistance Agency (PHEAA) has evolved into one of the nation’s leading student aid organizations. Today, PHEAA is a national provider of student financial services, serving millions of students and thousands of schools through its loan guaranty, loan servicing, financial aid processing, outreach, and other student aid programs.

PHEAA’s earnings are used to support its public service mission and to pay its operating costs, including administration of the Pennsylvania State Grant and other state-funded student aid programs. As the only major federal loan servicer with a nonprofit public service mission, PHEAA devotes its energy and resources to help ease the financial burden of higher education for its primary stakeholders—Pennsylvania students and families.

PHEAA conducts its student loan servicing operations nationally as FedLoan Servicing and American Education Services (AES). PHEAA operates its digital technology division as Avereo. For more information, visit PHEAA.org.

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Pennsylvania Higher Education Assistance Agency

1200 North Seventh Street, Harrisburg, PA 17102-1444 • 1-800-692-7392