

Action/Information Item

Governance and Monitoring Committee

**Consideration of Timelines and Implementation of Reports and Reviews
Included in the Governance Policies and Annual Oversight Plan**

At its September 6, 2007 Commission meeting, the Commission approved its Governance Policies and the Annual Oversight Plan.

Enclosed are summaries of the reports and reviews included in the Monitoring Policies section of the Governance Policies (Tab 3.a) and the Annual Oversight Plan (Tab 3.b). Also enclosed is a proposal for a "Dashboard Report" (Tab 3.c).

Governance and Monitoring Committee Chair Galligani requests that the Committee reviews these documents and is prepared to discuss the following:

- Prioritization
- Reporting method
- Timeline implementation
- Tracking
- Dashboard Report

SUMMARY OF CSAC MONITORING POLICIES

MONITORING POLICY 1: OVERALL COMPLIANCE WITH COMMISSION POLICIES

Frequency	Committee	Staff	Description	Notes
Twice Annually	Program Planning and Budget (PPB)	Both	Twice annually, the Executive Director and EdFund Board will each present a report indicating their organization's compliance with the Commission's policies as set forth in this document. The Executive Director and EdFund Board Chair, respectively, will sign these reports certifying their completeness and accuracy. The reports will identify any substantial lack of compliance, the reason for it, and steps that have been taken or that need to be taken, including any recommended Commission action, to achieve compliance with the Commission's policies.	

MONITORING POLICY 2: ENDS

Grant Program

Frequency	Committee	Staff	Description	Notes
Quarterly	PPB	CSAC	A. The number of: 1) Grant applicants in each of the grant and outreach programs for the current quarter and fiscal year to date.	
			2) The amount of grants or services, in total and by category of students (as specified by the Commission), provided in each of the grant and outreach programs for the current quarter and fiscal year to date as compared to budgeted amounts, and compared to actual data for the same periods in the previous three fiscal years.	
			B. Information on any processing backlogs or other delays that are resulting or could result in a delay of the delivery of funds to students.	
			C. Costs incurred in providing grant and outreach programs reported by major cost center, as specified by the Commission, for the current quarter and fiscal year to date, as compared to the budgeted amounts and same periods in the previous fiscal year.	
			D. Efficiency, processing performance, and quality metrics, as specified by the Commission, for the current quarter and fiscal year as compared to the same periods in the previous fiscal year.	

Loan Program

Frequency	Committee	Staff	Description	Notes
Quarterly	PPB	Both	E. The number of loans guaranteed by program and category, as specified by the Commission, for the current quarter and fiscal year to date, as compared to budgeted amounts, and compared to actual data for the same periods in the previous three fiscal years.	
			F. The total dollar amount of loans guaranteed by program and category, as specified by the Commission, for the current quarter and fiscal year to date, as compared to budgeted amounts, and compared to actual data for the same periods in the previous three fiscal years.	
			G. Information on any processing backlogs or other delays that are resulting or could result in a delay of the delivery of funds to students.	
			H. Costs incurred in providing loan guaranty programs reported by major cost center, as specified by the Commission, for the current quarter and fiscal year to date, as compared to the budgeted amounts and same periods in the previous fiscal year.	

Quarterly	PPB	Both	I. Efficiency, processing performance, and quality metrics, as specified by the Commission, for the current quarter and fiscal year as compared to the same periods in the previous fiscal year.	
			J. Financial statements in sufficient detail, as specified by the Commission, for the current quarter and fiscal year as compared to the same periods in the previous fiscal years.	
			K. Portfolio performance data, as specified by the Commission, that will include default aversion, claims paid, and recovery of defaulted loans disaggregated by collection type.	
			L. Any potential impact of the above information on the annual budget.	
			M. Comparison of key outcomes achieved by the loan program with those achieved by comparable student loan guaranty agencies (i.e., agencies with similar portfolios, range of services, and other characteristics).	
			N. Information on competitive and political actions that could: (i) materially affect the availability of loans to students and families provided through the loan guaranty programs; and (ii) materially affect the revenues received by the Commission for the loan program.	

MONITORING POLICY 3: COMMISSION GOVERNANCE

Frequency	Committee	Staff	Description	Notes
Ongoing basis	Governance and Monitoring (GM)		At least annually, the Commission's committee responsible for governance practices will review and present a report to the Commission assessing the Commission's compliance with the Governance Policies herein. This review and report will include assessment of the Commission's application of the overall governance approach, as well as compliance by the Commission Chair, Commissioners, and all Commission Committees to the Governance Policies. It will also examine the effectiveness of the Commissioner orientation and Commission education programs. The Committee will present its findings to the Commission, including any recommendations to improve Commission governance policies or practices.	

MONITORING POLICY 4: ASSIGNMENT AND RESPONSIBILITY

Frequency	Committee	Staff	Description	Notes
Ongoing basis	GM		On an ongoing basis, the Commission committee responsible for governance practices will assess the effectiveness of and compliance with the Commission's Assignment and Responsibility Policies by the Executive Director, EdFund Board/President, and FPPD or its successor. On an annual basis it will conduct an overall assessment of such compliance, and will prepare and present a report of its findings to the Commission, including any recommendations to improve clarity of these policies or compliance therewith.	

MONITORING POLICY 5: STRATEGIC AND ANNUAL PLANNING

Grant Program				
Frequency	Committee	Staff	Description	Notes
Annually	PB		On an annual basis, the Commission will review and adopt an annual update to the grant program strategic plan and annual plan, pursuant to the specific provisions in the Executive Parameters policies.	

SUMMARY OF CSAC MONITORING POLICIES

Loan Program				
Frequency	Committee	Staff	Description	Notes
Annually	PB		On an annual basis, the Commission will review and approve an EdFund Board-approved annual update to the loan program strategic plan and, pursuant to the specific provisions in the Executive Parameters policies.	

Overarching Strategic Plan

Background: The Commission will ensure that an overall strategic plan is developed from the strategic and annual plans developed by both the grant and loan programs. This overall strategic plan will focus on the linkages between the two organizations and how synergies can support the overall mission of the Student Aid Commission.

Frequency	Committee	Staff	Description	Notes
Quarterly	PB	Both	The Executive Director and EdFund Board/President will provide the Commission with quarterly updates reviewing progress in implementing the overarching and program-specific strategic plans, including whether annual plan objectives have been or are expected to be achieved in accordance with the specified timeline.	

MONITORING POLICY 6: FISCAL OPERATIONS

Background: On a quarterly basis, the Executive Director and EdFund President will each present a report examining their organization’s compliance with the Commission’s Fiscal Operations Policies. For each of the fiscal operations provisions in the Assignment and Executive Parameters Policies, the reports will identify any substantial lack of compliance, the reason for it, and steps that have been taken or that need to be taken, including any recommended Commission action, to achieve compliance. This will include compliance with timelines (for example, whether or not steps in the budgeting process have been completed according to the annual budget schedule).

Grant Program				
Frequency	Committee	Staff	Description	Notes
Annually	PB	CSAC	1) The proposed operating budget for the grant program which complies with the Commission’s Financial Planning and Annual Budget Policy and which is consistent with the grant program strategic and annual goals adopted by the Commission.	
	Audit		2) A schedule of planned internal audits and reviews of the grant program for the fiscal year. (Internal Auditor)	
	PB		3) The Financial Integrity and State Managers Accountability Act (FISMA) report, as necessary indicating updates to procedures to ensure that the grant program’s assets are protected, adequately maintained, and not unnecessarily risked.	
Quarterly	PB	CSAC	1) A summary or “dashboard” report describing the grant program’s current financial condition, including summarized financial statements and any items of significance to the overall financial performance of the organization, including at a minimum:	
			a) Year-to-date expenditures, as compared to the annual budget, with projection for year-end results.	
			b) Any significant budget variances based on the categories determined by the Commission.	
			c) Progress toward the attainment of the cost efficiency metrics established pursuant to the annual plan.	
			d) Proposed steps to address budget variances or other issues identified in a) through c) above, consistent with state processes.	

SUMMARY OF CSAC MONITORING POLICIES

As appropriate	Audit	CSAC	1) As scheduled, information on audits or reviews of the grant program to be performed by the State or federal government.	
			2) As completed, audits or reviews of the grant program performed or required by the State or federal government.	
			3) As completed, summary of internal grant program audit findings and resolutions to the satisfaction of grant program management and the Commission’s Audit Committee.	

State Reporting Regarding the Student Loan Operating Fund and Federal Fund

Frequency	Committee	Staff	Description	Notes
As appropriate	Audit	Both	At appropriate times throughout the year, the Executive Director, in collaboration with the EdFund Board/President and EdFund internal audit staff, will present to the appropriate Commission committee draft reports and documents to be submitted as necessary to the appropriate state agencies in regard to the Student Loan Operating Fund and Federal Fund. The Executive Director, EdFund Board/President, and EdFund internal audit staff will complete these reports and documents, and will submit them to the appropriate state agencies, under the guidance and direction of the Commission and its appropriate committee, and according to the procedures established in the Annual Oversight Plan.	

Loan Program

Frequency	Committee	Staff	Description	Notes
Annually	PB		1) The operating budget for the loan program approved by the EdFund Board which complies with the Commission’s Financial Planning and Annual Budget Policy and which is consistent with the loan program strategic and annual goals adopted by the Commission.	
	Audit	EdFund	2) A financial, system, and compliance audit of the loan program performed by an independent auditing firm approved by the Commission and EdFund Board Audit Committees, including audited financial statements.	
			3) External audits or reviews performed by the federal Department of Education (e.g., FFEL program compliance audit, VFA review), and by state entities (e.g., annual FFEL program compliance audit performed by the Bureau of State Audits).	
			4) A schedule of planned internal audits and reviews of EdFund and its programs for the fiscal year. (Internal Auditor)	
			5) A report reviewing, and as necessary indicating updates to, procedures to ensure that all reasonable and prudent measures are being taken to ensure that the loan program’s assets are protected, adequately maintained, and not unnecessarily risked (pursuant to the specific provisions in the Executive Parameters policies).	

As appropriate	PB	EdFund	1) A summary report describing the organization’s current financial condition, including summarized financial statements (or a “dashboard” report) any items of significance to the overall financial performance of the organization, including at a minimum:	
			a) Year-to-date expenditures, as compared to the annual budget, with projection for year-end results.	
			b) Any significant budget variances based on the categories determined by the Commission.	
			c) Year-to-date and projected use of the operating contingency established as part of the annual budget.	
			d) Progress toward the attainment of the cost efficiency metrics established pursuant to the annual plan.	
			2) A report, reviewed and approved by the EdFund Board, on the balance in the Federal Fund, Operating Fund, and Operating Reserve Fund, and the projected ability to meet the minimum reserve levels established by the Commission during the remainder of the fiscal year.	
As appropriate	Audit	EdFund	1) As scheduled, information on audits or reviews to be performed by the State or Federal government.	
			2) As completed, audits or reviews performed or required by the State or federal government.	
			3) As completed, summary of internal audit findings and resolutions to the satisfaction of EdFund management and the EdFund Board.	

MONITORING POLICY 7: PERSONNEL PRACTICES

Annual Executive Performance Reviews				
Frequency	Committee	Staff	Description	Notes
Annually	Personnel, Evaluation and Nominations		At least annually, the Commission will conduct a performance evaluation of the Executive Director, pursuant to the specific provisions in Governance Policy 2-N above. At least annually, the Commission will receive and review from the EdFund Board a summary of its performance evaluation and subsequent-year goals for the EdFund President. This review will include assessment of compliance with Commission policies herein.	
EdFund Board Performance Assessment				
Frequency	Committee	Staff	Description	Notes
Annually	GM		As part of the annual assessment and report described in Monitoring Policy 3, the Commission’s committee responsible for governance practices will conduct an assessment of the EdFund Board’s performance, in conjunction with the statutorily required Annual Report to the Legislature. This assessment will be based on the policies herein, and will include discussion with the EdFund Board regarding ways to improve governance practice and Commission and Board oversight of the loan program. This review will also include, based on input from the Executive Director, assessment of EdFund’s performance with respect to the administrative services provided by EdFund to the grant program.	

MONITORING POLICY 8: INTERNAL/EXTERNAL COMMUNICATIONS AND COMMISSION SUPPORT

Frequency	Committee	Staff	Description	Notes
Annual	GM		<p>As part of the annual assessment and report described in Monitoring Policy 3, the Commission’s committee responsible for governance practices will conduct an assessment of compliance with the Commission’s policies regarding Internal and External Communications, specifically the following four Policies:</p> <ul style="list-style-type: none">• Commission Governance Policy 2 (entitled “Commission’s Role”).• Commission Governance Policy 4 (entitled “Commissioner Role and Code of Conduct”).• Executive Parameters Policy 5 (entitled “Internal Communications and Commission Support”).• Executive Parameters Policy 6 (entitled “External Communications”). <p>This assessment will consider compliance by the Commissioners, the Executive Director, and the EdFund Board/President. It will assess the extent to which the Executive Director and EdFund Board/President have kept the Commission informed (e.g., regarding industry trends, staff points of view, etc.) and have supported the Commission in its external communication responsibilities (e.g., appropriately supporting Commission communication with government officials).</p> <p>The report will identify any substantial lack of compliance, the reason for it, and steps that have been taken or that need to be taken, including any recommended Commission action, to achieve compliance.</p> <p>In addition:</p>	
			A. The annual evaluation of the Executive Director and EdFund President (described above) will include assessment of compliance with the Commission’s Communications Policies.	
			B. From time to time, the Commission may also call upon the Commission committee responsible for governance practices to monitor and report compliance with these policies on the part of the Commission, the Executive Director, or the EdFund Board/President.	

SUMMARY OF CSAC ANNUAL PLAN FOR OVERSIGHT OF EDFUND

Annual Planning, Budgeting, and Reviews					
No.	Frequency	Committee	Name	Description	Notes
1	Annually	Programming, Planning and Budget (PPB)	EDFUND Strategic Plan	EDFUND's goals and strategies.	
2	Annually	PPB	Annual Loan Program Business Plan	EDFUND's business objectives, performance goals, marketing strategies, the loan program environment.	
3	Quarterly	PPB	EDFUND Annual Business Plan Quarterly Updates	The description of business objectives EDFUND plans to pursue, including information technology strategies, new products or services, material changes in EDFUND's operations, and the anticipated results.	
4	Annually	PPB	Annual Loan Program Budget	Projected revenues and expenses for budget year, plus a five-year projection of revenues and expenditures.	
5	Annually	Audit	EDFUND Annual Internal Audit Plan	EDFUND's schedule of internal audits that will be conducted over a two year period.	
6	Annually		EDFUND High Level Organizational Metrics	Year-End assessment of EDFUND's goal accomplishments.	
7	As determined by the Commission	Governance and Monitoring (GM)	Performance Evaluation of EDFUND	A Performance evaluation of the operation of EDFUND in furtherance of the Commission's fiscal and fiduciary responsibilities for approved programs.	
8	Annually (April 1)	PPB	CSAC Annual Report to the Legislature regarding EDFUND	Annual report that includes: (1) a description of the services provided (2) the annual budget, funded activities, and personnel, including the sources of revenue available to fund its operations. (3) a descriptions of positive and negative changes made in the delivery of loans to California students and enhancements to programs and activities administered by the commission. (4) The compensation of managers and executives (5) a description of the actions taken, costs incurred, and revenue realized, by the auxiliary organization in disbursement services, loan servicing and repayment, secondary market, and private lender activities that auxiliary organization undertakes.	

SUMMARY OF CSAC ANNUAL PLAN FOR OVERSIGHT OF EDFUND

Audits

No.	Frequency	Committee	Name	Description	Notes
1	Periodic, but usually one per year	Audit	U.S. Department of Education Audit	Routine review performed by the US Department of Education that typically focus on national initiatives, changes to the law, agency mergers, new affiliations and system changes, and low performance ranking.	
2	Annually	Audit	Annual FFEL Program Compliance Audit (Single Audit)	A comprehensive description of the audit as a rigorous, organization-wide audit or examination of an entity who expends \$500,000 or more of federal assistance for its operations. Performed by BSA on behalf of the State.	
3	Annually	Audit	Annual Operating Fund and Federal Fund Financial Statement Audit	Certified Public Accountant (CPA) Independent audit of the year-end financial statements of the Student Loan Operating Fund and Federal Fund conducted in accordance to Generally Accepted Accounting Principle (GAAP) and Government Auditing Standards.	
4	Annually	Audit	Annual EDFUND Financial Statement Audit	This is an annual independent audit of EDFUND's year-end financial statements conducted by an independent CPA firm in accordance with GAAP.	
5	Annually	Audit	Annual EDFUND 401K Plan Financial Statement Audit	This is an annual independent audit of EDFUND's 401(k) Plan for the year ending December 31 performed by an independent CPA firm.	
6	Annually	Audit	Annual Audit of Internal Controls	This is an audit of information technology controls over the generation of financial data as recommended by BSA.	
7	Upon completion	Audit	EDFUND Internal Audit Reports	Audit reports based on the approved audit plan that identify weaknesses and strengths in internal controls in EDFUND's administration of the loan program.	
8	As determined by the Commission, in consultation with the EDFUND Board	Audit	Other Audits	Reviews, audit or evaluations conducted by an independent CPA, independent consultant, or such other independent individuals or entities designated by the Commission as approved by the Commission's Audit Committee.	

SUMMARY OF CSAC ANNUAL PLAN FOR OVERSIGHT OF EDFUND

Documents and Reports Submitted to the Commission by EDFUND

A. Financial Reports

No.	Frequency	Committee	Name	Description	Notes
1	Quarterly and Annually	PPB	Unaudited Financial Statements and Analysis	Financial statements for both the Operating and Federal Funds that include: a financial variance report, a combined statement of assets, a statement of activities, a statement of cash flow, a revenues and expense variance report, and notes to financial statements.	
2	Monthly	(GM only if issues arise)	Monthly Invoice for Reimbursement of EDFUND Expenses from the State Treasury	Invoices for EDFUND's monthly expenses.	
3	Quarterly	PPB	Quarterly Long-Range Forecast	Long range five-year projection of revenues, expenses, and portfolio statistics.	
4	Monthly	PPB	Monthly Detailed Cash Flow Forecast for the Federal and Operating Funds	Cash flow forecast accompanied by a summary of changes that has been made since the prior month cash flow forecast	

B. Statistical Reports

No.	Frequency	Committee	Name	Description	Notes
1	Monthly/Quarterly/Annually	PPB	Monthly, Quarterly, and End of FFY Loan Program Statistics	Report on loan guarantees, defaults, collections, claims, outstanding loans, and comparison with prior year.	
2	Annually	(GM only if issues arise)	Report of EDFUND Market Share of California, Western Region, and Nationwide	Provides high-level information on and analysis of EDFUND's market share.	
3	Monthly/Annually	(GM only if issues arise)	Monthly and Annual Listing of Participating Schools and Lenders	Name of the institution, school/lender codes, location number and dollar volume of loans sorted by loan type. Monthly updates includes the top 200 schools and school groups	

SUMMARY OF CSAC ANNUAL PLAN FOR OVERSIGHT OF EDFUND

C. Other Documents and Reports

No.	Frequency	Committee	Name	Description	Notes
1	On-going basis	GM	Compliance with Operating Agreement and Service Level Agreement	The Operating Agreement and Service Level Agreement is the contract between CSAC and EDFUND that describes operational and support services and other permitted activities that are related to the student financial aid.	
2	On-going basis	PPB	Contract Log	List of EDFUND contracts including the name of the vendor/consultant, products and/or services requested, and cost.	
3	Annual/Quarterly/ Monthly	(GM only if issues arise)	Staffing Analysis and Personnel Reports	Information on number of employees authorized, filled/vacant positions, employee listings by department and cost center, and current organization charts.	
4	Quarterly	(GM only if issues arise)	Quarterly Ombudsman Report	The report provides information on the Ombudsman's activities, including the volume and general status of case inventory, sources of referrals and case volume by category.	
5	Quarterly	(GM only if issues arise)	Major Technology Projects Status Report	A report includes the project name and description, project start date, estimated completion date, milestone and budget status, issues/concerns.	
6	As needed	PPB	EdFund Policies	EDFUND' administrative and fiscal policies for the operations of EDFUND and the administration of the loan program	

SUMMARY OF CSAC ANNUAL PLAN FOR OVERSIGHT OF EDFUND

Oversight Meetings

No.	Frequency	Committee	Name	Description	Notes
1	Quarterly/As needed	(GM only if issues arise)	Operating Agreement Meetings	Operating Agreement Meetings are held quarterly, or as needed, to assist CSAC staff in monitoring loan program and synergy activities. CSAC and EDFUND staff involved in the following areas meet, as necessary: Administrative, Collections, Communications,	
2	Quarterly	(GM only if issues arise)	EDFUND Board Meeting	Attend, provide comments, and alert the EDFUND Board and/or its committees to CSAC staff's concerns prior to Board action.	
3	As needed	Governance and Monitoring	Discussion of Proposed of Pending Legislation or State/Federal Action	Discussion of any proposed state or federal legislation that impacts the loan program. Research, analysis, data modeling and recommendations regarding any positions to Commission should consider.	
4	As needed	PPB or GM, depending on issue	Discussion of Issues as They Arise	During the course of review of the Student Loan Program issues may arise that require CSAC staff to do further analysis, research and consultation with EDFUND staff	

California Student Aid Commission Dashboard Report

The Governance Policies—Monitoring Policy 6 proposes that a Dashboard Report be presented by the Governance and Monitoring Committee at each Commission meeting. A format for the Dashboard Report could be based on the following guidelines:

- It should be no more than two pages.
- It should generally present information graphically (e.g., line, pie, or bar charts).
- It should reflect current data compared to past data (e.g., compared to same period last year, or trends per month/quarter for the past three to five years).

The following Annual Oversight Plan (AOP) required reports should be used, as needed, for the loan program items in the Dashboard Report:

A. Unaudited Financial Statements and Analysis (Financial Reports Item 1)

Suggestion: The Dashboard should summarize trends – year to date versus same data for the past 5 years, or other trends as determined by the Commission. It should also highlight any significant variances (i.e., exclude anomalies that are not significant), and note whether each significant variance is cause for concern, and why or why not.

B. Quarterly Long-Range Forecast (Financial Reports Item 3)

Suggestion: The Dashboard should summarize the review CSAC staff conducts, which is described in the AOP as follows: *“Compare the current year re-forecasted budget to prior projections. Conduct a comparison of current year projections with the approved budget. Review any significant changes to the major revenues and expenses identified in Addendum 1. Perform trend analysis. Review EDFUND’s explanation on the significant variances.”*

C. Monthly Detailed Cash Flow Forecast for the Federal and Operating Funds (Financial Reports Item 4)

Suggestion: This information is critical. The Dashboard should summarize the review CSAC staff conducts, which is scribed in the AOP as follows: *“Review accompanying email outlining month-to-month changes in revenues and expenses to confirm that there are no significant variances, or if there are, the reasons for those variances.”*

D. Quarterly and End of FFY Loan Program Statistics (Statistical Reports Item 1)

Suggestion: This information is also critical. It represents EDFUND “sales volume” and indicates future revenues. At the meeting, it was agreed that this report would be presented to the Commission on a quarterly basis, rather than monthly. During some times of the year, activity may not be great; nonetheless, the Dashboard should always include this information and staff can note that the data is a result of seasonal trends.

E. Report of EdFUND Market Share of California, Western Region, and Nationwide (Statistical Reports Item 2)

Suggestion: The Dashboard should include a line graph showing a line for EDFUND’s market share in each geographical area (California, western region, and nationwide) across a five-year time span, with data shown for each quarter for that time period.

F. Monthly and Annual Listing of Participating Schools and Lenders (Statistical Reports Item 3)

Suggestion: The Dashboard should include a pie chart showing the percentage of the loan portfolio represented by each significant lender (with small ones combined into “other”), and a pie chart showing the percentage of the loan portfolio represented by each sector of schools (e.g., proprietary, Community Colleges, etc.). It should also note any noteworthy change in the list of top-tier schools (those that represent a significant and the percentage of the portfolio).