

ED-2023-SCC-0062-0004

Can the U.S. DOE use the Federal Audit Clearinghouse to obtain audits rather than relying on a separate system? Although the uploading is not time consuming, it adds another layer for completing an audit.

Response:

There is no interface between the Federal Audit Clearinghouse and the Department's eZ-Audit system. ED's Office of Federal Student Aid (FSA) is responsible for determining the financial responsibility and program compliance for institutions that participate in the Title IV programs. To enable FSA staff to make proper determinations, depending on the institution type, eZ-Audit may require additional information beyond what is collected by the Federal Audit Clearinghouse. For this reason, eZ-Audit will remain as a separate system.

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This comment is from a company called GetPotential solutions. They praise the system for what it does and then solicit us to let them help us improve it.

Response:

The Department is considering the commenter's suggestion that ED's office of Federal Student Aid (FSA) should be doing continuous monitoring and periodic reassessment of the burden to ensure the accuracy of the estimates and identify opportunities for streamlining the process further.

The Department is considering the commenter's recommendation for FSA to consider incorporating automated data validation and error-checking mechanisms within the eZ-Audit system in addition to providing clear guidelines, explanatory notes, and examples within the system.

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This comment is from a public accounting firm called McClintock and Associates. They list several enhancements they'd like to see in eZ-Audit.

Response:

For items 1, 2, 3, 5, 7, 8, 9, and 10, your suggestions will be passed on to the program office for consideration as future enhancements.

For item 4, we are currently working to establish a new phone tree system that will enable multiple staff members to field inquiries and respond timely. Currently the most effective way to contact the eZ-Audit helpdesk is by emailing fsaezaudit@ed.gov. There are resources dedicated to researching and responding to these email inquiries.

For item 6, ED's Office of Federal Student Aid (FSA) uses eZ-Audit as a workflow tool to review submissions and record determinations regarding institutions' financial responsibility and compliance with Title IV regulations. Only the final calculations and outcomes can be shared institutions/auditors. We acknowledge that this information was requested in your other comments.

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The Council for Education opposes eZ-Audit because they believe it violates international banking law under the Edge Act and a stipulation agreement with the Council for Education.

Response:

The purpose of the eZ-Audit system is to collect financial statements and compliance audits from entities that are either seeking participation or already participating in the Title IV programs. ED's Office of Federal Student Aid (FSA) uses this information to make timely and effective determinations regarding entities' financial responsibility and program compliance. Foreign gift/contract reporting is not currently done via the eZ-Audit system. Thus, these comments don't relate to this eZ-Audit renewal request.