



June 23, 2017

Debra K. Davenport
Auditor General
2910 N. 44th Street
Phoenix, AZ 85018

Re: Response to Auditor General's Report on Arizona Foster Care Tuition Waiver Pilot Program

Dear Ms. Davenport:

I am writing to provide a written response regarding the audit report of the Arizona Foster Care Tuition Waiver Pilot Programs. This response is a collaborative effort coordinated by the Arizona Board of Regents (ABOR) office and university financial aid leaders. Let me first express my appreciation for the professional manner and courtesy exhibited by your audit team in conducting the audit. Their insights and findings are both accurate and helpful.

I would also like to note that while I appreciate the report includes recommendations for community colleges, ABOR does not govern the community colleges, nor has any authority over their policies and procedures, and therefore my responses are on behalf of Arizona's public universities.

Background/Overview

More than three years have passed since A.R.S. (A.R.S.) §15-1809(C) became law and established foster care tuition waiver programs as a pilot program to facilitate post-secondary educational attainment for children in Arizona's foster care system. Pursuant to the statute, ABOR established Board Policy 4-323 B.3 that not only complies with the statute, but aligns with two of ABOR's enterprise goals:

REGENTS

Bill Ridenour, *Paradise Valley* • Ram Krishna, *Yuma* • Jay Heiler, *Paradise Valley* • Rick Myers, *Tucson* • Larry Penley, *Phoenix*
Ron Shoopman, *Tucson* Lyndel Manson, *Flagstaff* • Karrin Taylor Robson, *Phoenix* • **STUDENT REGENTS:** Jared Gorshe, *NAU* • Vianney Careaga, *UA*
EX-OFFICIO: Governor Doug Ducey • Superintendent of Public Instruction Diane Douglas

ENTERPRISE EXECUTIVE COMMITTEE

Eileen I. Klein, *Board President* • Michael M. Crow, *ASU President* • Rita Cheng, *NAU President* • Robert C. Robbins, *UA President*

- Drive student educational success and learning;
- Advance educational achievement within Arizona

Beyond the statute, policy and enterprise goals surrounding this initiative are the students this program serves — a marginalized population in need of support to earn a post-secondary degree. On behalf of the Arizona public universities and ABOR, we strongly believe in supporting these students as they work toward completing a degree and achieving the economic benefits that such a degree affords them.

The not-for-profit organization, Foster Care to Success, was a major proponent for the statute, and the universities established a voluntary partnership with the organization as part of the program implementation. Through this partnership, Foster Care to Success developed a digital portal, determined eligibility, facilitated the application process for the waivers and provided some data collection. There is no formal agreement yet between the organizations, but the universities desire to continue this partnership should the pilot program be continued through future legislative action.

Summary of Responses to Findings and Recommendations

With regard to your findings and recommendations, I would like to supplement the information provided in the formal response document with additional context.

Finding 1: *Programs have assisted recipients, but data management needs improvement, and changes to some requirements may increase programs' reach.*

We agree with both the finding and the related recommendations and will implement them. In the current programs, data tracking occurs both internally at the universities and through the service provider. Unfortunately, the data elements tracked are not standardized across the system and currently lack consistency. While the provider application portal is of significant benefit to the programs and the universities intend to continue the partnership with the provider, working with a private vendor does create challenges in data consistency. To that end, the universities intend to implement common policies and procedures to ensure that data and reporting are consistent. In partnership with the service provider, the board and the universities will:

- Work together with the service provider to determine standardized outcome data that should be tracked;
- Develop and implement policies and procedures outlining how the data should be collected;
- Ensure that appropriate staff are trained on policies and procedures; and

- Establish a method for validating the accuracy and uniformity of the data collected, such as requiring staff to update data that has changed and conducting periodic spot checks of data accuracy.

Should the Legislature continue the programs, the audit recommends studying the impacts and costs of modifying requirements by adding additional student supports such as:

- Requiring ABOR and the community college districts, as well as other state agencies such as the Arizona Department of Child Safety, to coordinate outreach efforts to ensure all eligible current and former foster youth are aware of the programs and receive correct information about them;
- Increasing the age cap on eligibility to better reflect the educational trajectory of former foster youth;
- Modifying the eligible educational expenses or the order in which financial assistance is applied to increase the amount of financial aid available to current and former foster youth for other educational expenses; and
- Encouraging on-campus support programs to help meet current and former foster youths' nonfinancial needs.

We support these recommendations, and should the Legislature decide to pursue this recommendation, the ABOR office will support them in determining which of the above steps should be taken. Any such review must also highlight the associated costs of adding any of the above recommendations.

The report also recommends if the Legislature continues the programs and desires further assessment, legislators should consult with stakeholders, community college districts and ABOR to determine which outcomes data should be tracked and reported. The universities are tracking outcomes such as retention and graduation rates and would welcome conversations with legislators about any additionally desired reporting.

Finding 2: *ABOR and community college districts should improve programs' implementation.*

The board recognizes the importance of this finding, and we agree that implementation of the programs should be efficient, transparent and effective.

To ensure that these recommendations are implemented, the universities will work with the service provider to negotiate a formal agreement to ensure roles and responsibilities are clearly defined and understood.

ABOR and the universities will:

- Identify any deficiencies in their policies and procedures or training as part of their review; modify policies and procedures and/or train all relevant staff as appropriate; enter into a contract with the selected service provider that clearly defines the roles, responsibilities, and requirements for each party, including how the service provider will be monitored, how the programs' data will be managed and when the programs' application will be made available to applicants;
- Should a formal agreement be reached with the service provider, the universities will ensure:
 - Roles, responsibilities and requirements are clearly defined;
 - Implementation is designed to include how the programs' data will be managed;
 - The date that the application is made available to students is clear.
- Should a formal agreement not be reached with the service provider, the universities will develop internal systems addressing the actions recommended as if they had used a service provider and establish these measures:
 - Developing a method for applicants to apply for the programs, and how the programs will be evaluated if they are not continued. (If the programs are discontinued, the universities agree to support and evaluate current eligible participants.);
 - Ensuring that applicants meet the foster care eligibility requirement;
 - Ensuring that the programs' applications are reviewed in a timely fashion in order for applicants and their families to have an opportunity to make important decisions about college attendance and financial aid;
 - Ensuring that required volunteer hours are completed; and
 - Developing and implementing procedures for applicants to receive, understand, and have sufficient time to complete any required forms or documentation that the universities may require as part of the application process.

Additional Considerations

The report's findings and recommendations provided us the opportunity to engage in a broader dialogue about our tuition waiver populations including: logistical issues, governing authority and oversight; the importance of and management of third-party service providers; and appropriate data collection and reporting for all waiver populations. Some of those thoughts are included here.

First, as we approach implementation of audit objectives, because the continuation of the programs is uncertain and dependent on legislative action, we have not included timelines or deadlines for implementation. Our intent is to begin implementation during the remaining life of the programs and if legislation is enacted continuing this pilot program, ABOR will work with the universities to formulate implementation plans including action

items, milestones, timelines and deadlines to satisfy any statutory requirements and the Auditor General's recommendations.

Second, while we agree with your recommendation to enter a formal agreement with the service provider, we would like to note that the service provider is a not-for-profit entity. Our belief is the service provider will be cooperative with this initiative, but we cannot guarantee that outcome.

Finally, your audit has afforded us the opportunity to think about data collection and reporting for other waiver populations. Our intent is to work with universities on data collection, program implementation, policies and procedures, and reporting mandates to align all such programs with the Auditor General recommendations. This process will begin this summer as we develop the data for the FY 2017 Financial Aid report.

Conclusion

We believe the audit was a successful review of the Foster Care Tuition Waiver program and will inform the Legislature on the early successes and outcomes of the programs. The audit has also provided meaningful recommendations to improve implementation of the programs. While data tracking was not part of the original legislation, it is an enterprise imperative that goes beyond complying with the statute; evidence-based strategies must be employed to meet ABOR goals, metrics, and the economic and educational needs of this state. Monitoring and evaluating the programs represent sound public policy as well as a critical step to ensure the success of the Foster Care Tuition Waiver program.

However, there are constraints that must be addressed. As the Legislature considers continuing and perhaps expanding the programs, they must remember there is no such thing as free tuition. While tuition may be waived for this population, there is a cost to educate these students and that cost is currently passed on to other students and their families. When the statute was first implemented, JLBC provided a cost estimate of approximately \$511,000 over a five-year period. We are just over three years into the program and costs already exceed that value. The table below outlines the number of participants and the costs borne by the universities.

University	Waiver Applicants	Waiver Recipients	Total Value of Waivers
ASU	129	70	\$324,670
NAU	46	32	\$95,129
UA	44	28	\$122,944
Total	219	130	\$542,743

Although ABOR and the universities wish to accommodate any and all disadvantaged populations, it does come at a significant cost. The universities already provide more than \$400 million in financial aid to Arizona resident students. Again, these costs are passed on to the families of other students who do not qualify for need-based aid.

That said, the pilot program has proven beneficial for students. ABOR and Arizona's public universities look forward to further developments of the program, including a formalized partnership with Foster Care to Success to improve data collection and program implementation to include improved outreach to potentially eligible participants and adding additional student supports.

Please feel free to contact me with any questions. I appreciate your leadership and your team's due diligence to conduct a thorough, informative and useful audit.

Sincerely,

Eileen I. Klein
President

Finding 1: Programs have assisted recipients, but data management needs improvement, and changes to some requirements may increase Programs' reach

Recommendation 1.1: The community college districts, and ABOR in collaboration with the universities, should each establish processes for collecting and/or reporting data on the Programs using one of the following options:

- If each community college district, and if ABOR in collaboration with the universities, continue using an outside service provider to collect the Programs' data, they should develop and implement policies and procedures for providing accurate and consistent data to the outside service provider and ensure that all appropriate staff are trained on these policies and procedures; or
- If each community college district, and if ABOR in collaboration with the universities, do not continue using an outside service provider to collect the Programs' data, they should develop and implement policies and procedures for collecting key program data that the Provider currently collects, such as who applied for a waiver, who received a waiver, and the reasons waivers were denied, and ensure that all appropriate staff are trained on these policies and procedures.

Response: The finding of the Auditor General is agreed to and the audit recommendation will be implemented.

Recommendation 1.2: If the Legislature continues the Programs and determines that further assessment of their effectiveness should be performed, it should consider, in consultation with relevant stakeholders—including the community college districts and ABOR—what program outcome data, such as graduation and dropout rates, should be tracked and reported.

Response: The finding of the Auditor General is agreed to and the audit recommendation will be implemented.

Response explanation: It is important to the universities that legislators collaborate with the universities to determine what program outcomes should be tracked and reported.

Recommendation 1.3: If the Legislature determines to continue the Programs, it should consider studying, in consultation with relevant stakeholders, the impacts and increased costs of modifying some requirements or adding additional supports to expand the reach of the Programs, such as:

- Requiring the community college districts and ABOR, as well as other state agencies such as the Arizona Department of Child Safety, to coordinate outreach efforts to ensure all eligible current and former foster youth are aware of the Programs and receive correct information about them;
- Increasing the age cap on eligibility to better reflect the educational trajectory of former foster youth;

- Modifying the eligible educational expenses or the order in which financial assistance is applied to increase the amount of financial aid available to current and former foster youth for other educational expenses; and
- Encouraging on-campus support programs to help meet current and former foster youths' nonfinancial needs.

Response: The finding of the Auditor General is agreed to and the audit recommendation will be implemented.

Response explanation: We support this recommendation to the legislature.

Finding 2: ABOR and community college districts should improve Programs' implementation

Recommendation 2.1: The community college districts, and ABOR in collaboration with the universities, should each review their policies and procedures for processing waiver applications to ensure that they provide adequate and appropriate guidance for verifying that applicants meet all eligibility requirements before awarding a waiver. As part of this review, they should ensure that the policies and procedures align with the eligibility requirements governing foster care tuition waivers and that appropriate community college district and university staff who process waiver applications have been trained on the policies and procedures.

Response: The finding of the Auditor General is agreed to and the audit recommendation will be implemented.

Recommendation 2.2: If the community college districts, and if ABOR in collaboration with the universities, identify any deficiencies in their policies and procedures or training as part of their review, they should modify their policies and procedures and/or train all relevant staff as appropriate.

Response: The finding of the Auditor General is agreed to and the audit recommendation will be implemented.

Recommendation 2.3: The community college districts, and if ABOR in collaboration with the universities, should each determine whether they will continue using an outside service provider to assist in the Programs' operation, and then implement one of the following options:

- If the community college districts, and if ABOR in collaboration with the universities, continue using an outside service provider, they should each enter into a contract with an outside service provider that clearly defines the roles, responsibilities, and requirements for each party, including how the outside service provider will be monitored, how the Programs' data will be managed, and when the Programs' application will be made available to applicants; or
- If the community college districts, and if ABOR in collaboration with the universities, do not continue using an outside service provider, they should each develop processes for:

- Ensuring that applicants have a method for applying for the Programs, including how to evaluate recipients if the Programs are not continued;
- Ensuring that applicants meet the foster care eligibility requirement;
- Ensuring that the Programs' application(s) are opened and/or reviewed each semester on a date that ensures applicants have adequate opportunity to make critical decisions about their college attendance and seek additional financial aid; and
- Ensuring that statutorily required volunteer hours are completed.

Response: The finding of the Auditor General is agreed to and the audit recommendation will be implemented.

Response explanation: The universities plan to continue using the service provider.

Recommendation 2.4: The community college districts, and ABOR in collaboration with the universities, should each develop and implement procedures for ensuring that applicants receive, understand, and have sufficient time to complete any required forms or documentation that the universities or community college districts may require as part of the application process, such as supplemental forms that require applicants to self-certify that they have met the waiver eligibility requirements.

Response: The finding of the Auditor General is agreed to and the audit recommendation will be implemented.



June 23, 2017

Ms. Debbie Davenport, Auditor General
Office of the Auditor General
2910 N. 44th Street, Suite 410
Phoenix, AZ 85018

Dear Ms. Davenport:

Enclosed please find the response for the revised preliminary draft report of the performance audit of the Arizona Foster Care Tuition Waiver Pilot Program.

Arizona Western College is committed to continuous quality improvement, transparency and accountability. We look forward to sharing our progress in implementing the recommendations.

Sincerely,

Ana M. English
Financial Aid Director
Arizona Western College

Finding 1: Programs have assisted recipients, but data management needs improvement, and changes to some requirements may increase Programs' reach

Recommendation 1.1: The community college districts, and ABOR in collaboration with the universities, should each establish processes for collecting and/or reporting data on the Programs using one of the following options:

- If each community college district, and if ABOR in collaboration with the universities, continue using an outside service provider to collect the Programs' data, they should develop and implement policies and procedures for providing accurate and consistent data to the outside service provider and ensure that all appropriate staff are trained on these policies and procedures; or
- If each community college district, and if ABOR in collaboration with the universities, do not continue using an outside service provider to collect the Programs' data, they should develop and implement policies and procedures for collecting key program data that the Provider currently collects, such as who applied for a waiver, who received a waiver, and the reasons waivers were denied, and ensure that all appropriate staff are trained on these policies and procedures.

Response: The finding of the Auditor General is agreed to and the audit recommendation will be implemented.

Response explanation: Arizona Western College will continue to use option one. AWC will continue to use the outside provider FosterCare2Success to collect the Programs data to determine eligibility. Policies and procedures have been implemented to ensure accurate and consistent data and to ensure the appropriate staff is trained on these policies and procedures.

Recommendation 1.2: If the Legislature continues the Programs and determines that further assessment of their effectiveness should be performed, it should consider, in consultation with relevant stakeholders—including the community college districts and ABOR—what program outcome data, such as graduation and dropout rates, should be tracked and reported.

Response: Not applicable.

Response explanation: This finding is targeted towards the State Legislature.

Recommendation 1.3: If the Legislature determines to continue the Programs, it should consider studying, in consultation with relevant stakeholders, the impacts and increased costs of modifying some requirements or adding additional supports to expand the reach of the Programs, such as:

- Requiring the community college districts and ABOR, as well as other state agencies such as the Arizona Department of Child Safety, to coordinate outreach efforts to ensure all eligible current and former foster youth are aware of the Programs and receive correct information about them;

- Increasing the age cap on eligibility to better reflect the educational trajectory of former foster youth;
- Modifying the eligible educational expenses or the order in which financial assistance is applied to increase the amount of financial aid available to current and former foster youth for other educational expenses; and
- Encouraging on-campus support programs to help meet current and former foster youths' nonfinancial needs.

Response: Not applicable.

Response explanation: This finding is targeted towards the Arizona State Legislature.

Finding 2: ABOR and community college districts should improve Programs' implementation

Recommendation 2.1: The community college districts, and ABOR in collaboration with the universities, should each review their policies and procedures for processing waiver applications to ensure that they provide adequate and appropriate guidance for verifying that applicants meet all eligibility requirements before awarding a waiver. As part of this review, they should ensure that the policies and procedures align with the eligibility requirements governing foster care tuition waivers and that appropriate community college district and university staff who process waiver applications have been trained on the policies and procedures.

Response: The finding of the Auditor General is agreed to and the audit recommendation will be implemented.

Response explanation: Arizona Western College has policies and procedures in place to ensure all applicants are verified and meet all eligibility requirements before awarding a waiver. Any recommendations that relate to best practice program improvements will be implemented. Appropriate staff will be trained to follow these policies and procedures.

Recommendation 2.2: If the community college districts, and if ABOR in collaboration with the universities, identify any deficiencies in their policies and procedures or training as part of their review, they should modify their policies and procedures and/or train all relevant staff as appropriate.

Response: The finding of the Auditor General is agreed to and the audit recommendation will be implemented.

Response explanation: Arizona Western College will modify policy and procedures if any deficiencies are identified.

Recommendation 2.3: The community college districts, and ABOR in collaboration with the universities, should each determine whether they will continue using an outside service provider to assist in the Programs' operation, and then implement one of the following options:

- If the community college districts, and if ABOR in collaboration with the universities, continue using an outside service provider, they should each enter into a contract with an outside service provider that clearly defines the roles, responsibilities, and requirements for each party, including how the outside service provider will be monitored, how the Programs' data will be managed, and when the Programs' application will be made available to applicants; or
- If the community college districts, and if ABOR in collaboration with the universities, do not continue using an outside service provider, they should each develop processes for:
 - Ensuring that applicants have a method for applying for the Programs, including how to evaluate recipients if the Programs are not continued;
 - Ensuring that applicants meet the foster care eligibility requirement;
 - Ensuring that the Programs' application(s) are opened and/or reviewed each semester on a date that ensures applicants have adequate opportunity to make critical decisions about their college attendance and seek additional financial aid; and
 - Ensuring that statutorily required volunteer hours are completed.

Response: The finding of the Auditor General is agreed to and the audit recommendation will be implemented.

Response explanation: Arizona Western College will continue to use FosterCare2Success and will enter into an agreement that clearly defines the roles, responsibilities, and requirements for each party to provide the necessary data in determining if a student meets the requirements to receive a waiver.

Recommendation 2.4: The community college districts, and ABOR in collaboration with the universities, should each develop and implement procedures for ensuring that applicants receive, understand, and have sufficient time to complete any required forms or documentation that the universities or community college districts may require as part of the application process, such as supplemental forms that require applicants to self-certify that they have met the waiver eligibility requirements.

Response: The finding of the Auditor General is agreed to and the audit recommendation will be implemented.

Response explanation: Arizona Western College will continue to work with FosterCare2Success to determine if a student qualifies for a waiver. Arizona Western College has set deadlines that ensure applicants receive, understand and have sufficient time to complete the required documentation.



June 26, 2017

Ms. Debbie Davenport, Auditor General
Office of the Auditor General
2910 N 44th Street, Suite 410
Phoenix, AZ 85018

Dear Ms. Davenport,

Attached you will find Central Arizona College's response to the revised preliminary report of the Arizona Foster Care Tuition Waiver Pilot Program. Central Arizona College acknowledges and supports the recommendations to improve data management and necessary changes to ensure effectiveness of the program's implementation and support to student success.

Central Arizona College is committed to continuous quality improvement, transparency, and accountability. We look forward to sharing our progress in implementing these recommendations.

Sincerely,

Elisa Juarez
Director of Financial Aid

Enclosure: Audit Response - Arizona Foster Care Tuition Waiver Program

Central Arizona College
District Offices

Superstition Mountain Campus
805 S. Idaho Road
Apache Junction, AZ 85119

Aravaipa Campus
80440 E. Aravaipa Road
Winkelman, AZ 85192

Signal Peak Campus
8470 North Overfield Road
Coolidge, AZ 85128-9030

Maricopa Campus
17945 North Regent Drive
Maricopa, AZ 85138-7808

San Tan Campus
3736 E. Bella Vista Rd
San Tan Valley, AZ 85143

1-800-237-9814
www.centralaz.edu

Finding 1: Programs have assisted recipients, but data management needs improvement, and changes to some requirements may increase Programs' reach

Recommendation 1.1: The community college districts, and ABOR in collaboration with the universities, should each establish processes for collecting and/or reporting data on the Programs using one of the following options:

- If each community college district, and if ABOR in collaboration with the universities, continue using an outside service provider to collect the Programs' data, they should develop and implement policies and procedures for providing accurate and consistent data to the outside service provider and ensure that all appropriate staff are trained on these policies and procedures; or
- If each community college district, and if ABOR in collaboration with the universities, do not continue using an outside service provider to collect the Programs' data, they should develop and implement policies and procedures for collecting key program data that the Provider currently collects, such as who applied for a waiver, who received a waiver, and the reasons waivers were denied, and ensure that all appropriate staff are trained on these policies and procedures.

Response: The finding of the Auditor General is agreed to and the audit recommendation will be implemented.

Recommendation 1.2: If the Legislature continues the Programs and determines that further assessment of their effectiveness should be performed, it should consider, in consultation with relevant stakeholders—including the community college districts and ABOR—what program outcome data, such as graduation and dropout rates, should be tracked and reported.

Response: The finding of the Auditor General is agreed to and the audit recommendation will be implemented.

Recommendation 1.3: If the Legislature determines to continue the Programs, it should consider studying, in consultation with relevant stakeholders, the impacts and increased costs of modifying some requirements or adding additional supports to expand the reach of the Programs, such as:

- Requiring the community college districts and ABOR, as well as other state agencies such as the Arizona Department of Child Safety, to coordinate outreach efforts to ensure all eligible current and former foster youth are aware of the Programs and receive correct information about them;
- Increasing the age cap on eligibility to better reflect the educational trajectory of former foster youth;

- Modifying the eligible educational expenses or the order in which financial assistance is applied to increase the amount of financial aid available to current and former foster youth for other educational expenses; and
- Encouraging on-campus support programs to help meet current and former foster youths' nonfinancial needs.

Response: The finding of the Auditor General is agreed to and the audit recommendation will be implemented.

Finding 2: ABOR and community college districts should improve Programs' implementation

Recommendation 2.1: The community college districts, and ABOR in collaboration with the universities, should each review their policies and procedures for processing waiver applications to ensure that they provide adequate and appropriate guidance for verifying that applicants meet all eligibility requirements before awarding a waiver. As part of this review, they should ensure that the policies and procedures align with the eligibility requirements governing foster care tuition waivers and that appropriate community college district and university staff who process waiver applications have been trained on the policies and procedures.

Response: The finding of the Auditor General is agreed to and the audit recommendation will be implemented.

Recommendation 2.2: If the community college districts, and if ABOR in collaboration with the universities, identify any deficiencies in their policies and procedures or training as part of their review, they should modify their policies and procedures and/or train all relevant staff as appropriate.

Response: The finding of the Auditor General is agreed to and the audit recommendation will be implemented.

Recommendation 2.3: The community college districts, and ABOR in collaboration with the universities, should each determine whether they will continue using an outside service provider to assist in the Programs' operation, and then implement one of the following options:

- If the community college districts, and if ABOR in collaboration with the universities, continue using an outside service provider, they should each enter into a contract with an outside service provider that clearly defines the roles, responsibilities, and requirements for each party, including how the outside service provider will be monitored, how the Programs' data will be managed, and when the Programs' application will be made available to applicants; or

- If the community college districts, and if ABOR in collaboration with the universities, do not continue using an outside service provider, they should each develop processes for:
 - Ensuring that applicants have a method for applying for the Programs, including how to evaluate recipients if the Programs are not continued;
 - Ensuring that applicants meet the foster care eligibility requirement;
 - Ensuring that the Programs' application(s) are opened and/or reviewed each semester on a date that ensures applicants have adequate opportunity to make critical decisions about their college attendance and seek additional financial aid; and
 - Ensuring that statutorily required volunteer hours are completed.

Response: The finding of the Auditor General is agreed to and the audit recommendation will be implemented.

Recommendation 2.4: The community college districts, and ABOR in collaboration with the universities, should each develop and implement procedures for ensuring that applicants receive, understand, and have sufficient time to complete any required forms or documentation that the universities or community college districts may require as part of the application process, such as supplemental forms that require applicants to self-certify that they have met the waiver eligibility requirements.

Response: The finding of the Auditor General is agreed to and the audit recommendation will be implemented.



COCHISE COLLEGE
OFFICE OF THE
PRESIDENT

June 21, 2017

Ms. Debra K. Davenport, Auditor General
Office of the Auditor General
2910 North 44th Street, Suite 410
Phoenix, AZ 85018

Dear Ms. Davenport:

Attached you will find Cochise College's response to the Arizona Foster Care Tuition Waiver Programs Performance Audit, conducted by the Office of the Auditor General and received by the college on June 19, 2017.

We appreciate the opportunity to provide a response and some insight on the program and its future. Cochise College is committed to continuous quality improvement, transparency, and accountability. Should the legislature decide to continue/improve the program, Cochise College stands ready to provide insight and recommendations that might make the program more efficient and effective for potential students and the institutions who serve them.

Attached is the College's response to your findings and recommendations. We look forward to sharing our progress in implementing these recommendations.

Sincerely,

J.D. Rottweiler, Ph.D.
President

Cochise College Response to findings from the Auditor General's Office related to the implementation of the Arizona Foster Care Tuition Waiver Pilot Programs

Finding 1: Programs have assisted recipients, but data management needs improvement, and changes to some requirements may increase Programs' reach

Recommendation 1.1: The community college districts, and ABOR in collaboration with the universities, should each establish processes for collecting and/or reporting data on the Programs using one of the following options:

- If each community college district, and if ABOR in collaboration with the universities, continue using an outside service provider to collect the Programs' data, they should develop and implement policies and procedures for providing accurate and consistent data to the outside service provider and ensure that all appropriate staff are trained on these policies and procedures; or
- If each community college district, and if ABOR in collaboration with the universities, do not continue using an outside service provider to collect the Programs' data, they should develop and implement policies and procedures for collecting key program data that the Provider currently collects, such as who applied for a waiver, who received a waiver, and the reasons waivers were denied, and ensure that all appropriate staff are trained on these policies and procedures.

Response: The finding of the Auditor General is not agreed to and the recommendation will not be implemented.

Response explanation: Cochise College has implemented the required policies and procedures for the pilot program. Cochise College is participating in the tuition waiver program consistent with current law (A.R.S. 15-1809). Eligibility is determined based on the information received within the Free Application for Federal Student Aid (FAFSA) and Cochise College's Admissions Process after notification of the applicant's personal information is received from Foster Care to Success (FC2S). The FC2S program verifies the eligibility regarding the age (16) and the applicant's status in the program. Once status is determined, FC2S submits this information into the database and then notifies the college. FC2S also provides information related to monitoring and substantiating volunteer service and provides the college verification that an applicant has performed 30 hours of volunteer service so they remain eligible to receive the next tuition waiver. All Foster Care Waiver Applicants are required to fill out the FAFSA before being considered for the tuition waiver. Cochise College uses the FAFSA to determine the student's citizenship status, thus as students complete a FAFSA, it will have already verified lawful presence in the United States. Cochise College also uses the student's selection on the admissions application to comply with the requirement to verify the applicant is enrolled in an accredited degree or certificate program in order to qualify for this waiver. Cochise College has policies and procedures on how to maintain good standing, and on how to handle the Federal FAFSA and other funds. The FAFSA is the main tool used in determining eligibility in the waiver program and is where we find the required information needed to comply with this statute.

Recommendation 1.2: If the Legislature continues the Programs and determines that further assessment of their effectiveness should be performed, it should consider, in consultation with relevant stakeholders—including the community college districts and

Cochise College Response to findings from the Auditor General’s Office related to the implementation of the Arizona Foster Care Tuition Waiver Pilot Programs

ABOR—what program outcome data, such as graduation and dropout rates, should be tracked and reported.

Response: Not applicable.

Response explanation: This recommendation is outside the purview of Cochise College, as the Legislature will make that assessment and future law. This recommendation may be in line with other states, but is not in the current law. Cochise College has complied with the current law as no outcome reporting is required. Should the legislature desire to continue the program, and if the recommendations outlined by the Auditor General are accepted, then additional resources should be provided to the universities and colleges for this extensive data collection activity which is in addition to the original scope of A.R.S.15-1809.

Recommendation 1.3: If the Legislature determines to continue the Programs, it should consider studying, in consultation with relevant stakeholders, the impacts and increased costs of modifying some requirements or adding additional supports to expand the reach of the Programs, such as:

- Requiring the community college districts and ABOR, as well as other state agencies such as the Arizona Department of Child Safety, to coordinate outreach efforts to ensure all eligible current and former foster youth are aware of the Programs and receive correct information about them;
- Increasing the age cap on eligibility to better reflect the educational trajectory of former foster youth;
- Modifying the eligible educational expenses or the order in which financial assistance is applied to increase the amount of financial aid available to current and former foster youth for other educational expenses; and
- Encouraging on-campus support programs to help meet current and former foster youths’ nonfinancial needs.

Response: Not applicable.

Response explanation: This recommendation falls outside the purview of Cochise College, because the Legislature will make that assessment and future law. This recommendation may be in line with other states, but again it is not in the current law. Cochise College is compliant with the current law because A.R.S. 15-1809 does not currently require institutions to comply with the recommendation listed above. Should the legislature desire to continue the program, and if the recommendations outlined by the Auditor General are accepted, additional resources should be provided for the universities and colleges to support this recommendation.

Finding 2: ABOR and community college districts should improve Programs’ implementation

Recommendation 2.1: The community college districts, and ABOR in collaboration with the universities, should each review their policies and procedures for processing waiver

Cochise College Response to findings from the Auditor General's Office related to the implementation of the Arizona Foster Care Tuition Waiver Pilot Programs

applications to ensure that they provide adequate and appropriate guidance for verifying that applicants meet all eligibility requirements before awarding a waiver. As part of this review, they should ensure that the policies and procedures align with the eligibility requirements governing foster care tuition waivers and that appropriate community college district and university staff who process waiver applications have been trained on the policies and procedures.

Response: The finding of the Auditor General is not agreed to and the recommendation will not be implemented.

Response explanation: A.R.S. 15-1809 does not currently specify operational methods such as those recommended. Cochise College is participating in the tuition waiver program consistent with current law and complied with all eligibility and funding requirements.

Recommendation 2.2: If the community college districts, and if ABOR in collaboration with the universities, identify any deficiencies in their policies and procedures or training as part of their review, they should modify their policies and procedures and/or train all relevant staff as appropriate.

Response: The finding of the Auditor General is agreed to and the audit recommendation will be implemented.

Response explanation: If any deficiencies in Cochise College's policies and procedures are found, the college will modify them and train staff accordingly. The college's Financial Aid Office has made necessary updates to policy and procedure and will ensure that financial aid staff are trained on all applicable changes.

Recommendation 2.3: The community college districts, and ABOR in collaboration with the universities, should each determine whether they will continue using an outside service provider to assist in the Programs' operation, and then implement one of the following options:

- If the community college districts, and if ABOR in collaboration with the universities, continue using an outside service provider, they should each enter into a contract with an outside service provider that clearly defines the roles, responsibilities, and requirements for each party, including how the outside service provider will be monitored, how the Programs' data will be managed, and when the Programs' application will be made available to applicants; or
- If the community college districts, and if ABOR in collaboration with the universities, do not continue using an outside service provider, they should each develop processes for:
 - Ensuring that applicants have a method for applying for the Programs, including how to evaluate recipients if the Programs are not continued;
 - Ensuring that applicants meet the foster care eligibility requirement;

Cochise College Response to findings from the Auditor General's Office related to the implementation of the Arizona Foster Care Tuition Waiver Pilot Programs

- Ensuring that the Programs' application(s) are opened and/or reviewed each semester on a date that ensures applicants have adequate opportunity to make critical decisions about their college attendance and seek additional financial aid; and
- Ensuring that statutorily required volunteer hours are completed.

Response: The finding of the Auditor General is not agreed to and the recommendation will not be implemented.

Response explanation: Cochise College is participating in the tuition waiver program consistent with the current wording of the law (A.R.S. 15-1809) which does not require contractual arrangements. As noted in the recommendation related to the first finding, should the legislature desire to continue the program, and if the recommendations outlined by the Auditor General are accepted, then additional resources should be provided to the universities and colleges for any recommended additional activities outside the law's original scope.

Recommendation 2.4: The community college districts, and ABOR in collaboration with the universities, should each develop and implement procedures for ensuring that applicants receive, understand, and have sufficient time to complete any required forms or documentation that the universities or community college districts may require as part of the application process, such as supplemental forms that require applicants to self-certify that they have met the waiver eligibility requirements.

Response: The finding of the Auditor General is not agreed to and the recommendation will not be implemented.

Response explanation: State Statute 15-1809 does not currently specify operational methods such as those recommended. Cochise College will continue to work with Foster Care to Success in determining which students qualify for a Foster Care Tuition Waiver. Should the legislature desire to continue the program, and if the recommendations outlined by the Auditor General are accepted, additional resources should be provided for the universities and colleges.



June 22, 2017

Ms. Debra K. Davenport, Auditor General
Office of the Auditor General
2910 North 44th Street, Suite 410
Phoenix, Arizona 85018

Dear Ms. Davenport:

Coconino Community College appreciates the opportunity to provide a response to the Foster Care Waiver Audit conducted by your office that was received on June 16, 2017. The College is committed to continuous quality improvement, transparency, and accountability.

Attached is our response to your findings and recommendations. We look forward to sharing our progress in implementing these recommendations.

Sincerely,

Dr. Colleen Smith
President

Enclosure: Foster Care Tuition Waiver Audit Response

Finding 1: Programs have assisted recipients, but data management needs improvement, and changes to some requirements may increase Programs' reach

Recommendation 1.1: The community college districts, and ABOR in collaboration with the universities, should each establish processes for collecting and/or reporting data on the Programs using one of the following options:

- If each community college district, and if ABOR in collaboration with the universities, continue using an outside service provider to collect the Programs' data, they should develop and implement policies and procedures for providing accurate and consistent data to the outside service provider and ensure that all appropriate staff are trained on these policies and procedures; or
- If each community college district, and if ABOR in collaboration with the universities, do not continue using an outside service provider to collect the Programs' data, they should develop and implement policies and procedures for collecting key program data that the Provider currently collects, such as who applied for a waiver, who received a waiver, and the reasons waivers were denied, and ensure that all appropriate staff are trained on these policies and procedures.

Response: The finding of the Auditor General is agreed to and the audit recommendation will be implemented.

Response explanation: Coconino Community College agrees that these recommendations for community college districts are appropriate and that data management is important. Coconino currently uses an outside service provider and will review policies and procedures to ensure data accuracy with the outside service provider. Decisions to change some requirements for the program are the responsibility of the Legislature.

Recommendation 1.2: If the Legislature continues the Programs and determines that further assessment of their effectiveness should be performed, it should consider, in consultation with relevant stakeholders—including the community college districts and ABOR—what program outcome data, such as graduation and dropout rates, should be tracked and reported.

Response: Not applicable.

Response explanation: While Recommendation 1.2 is directed to the Legislature, Coconino Community College agrees with the Auditor General's recommendation to include ABOR and the Community Colleges in determining what program outcomes data should be tracked.

Recommendation 1.3: If the Legislature determines to continue the Programs, it should consider studying, in consultation with relevant stakeholders, the impacts and increased costs of modifying some requirements or adding additional supports to expand the reach of the Programs, such as:

- Requiring the community college districts and ABOR, as well as other state agencies such as the Arizona Department of Child Safety, to coordinate outreach efforts to ensure all

eligible current and former foster youth are aware of the Programs and receive correct information about them;

- Increasing the age cap on eligibility to better reflect the educational trajectory of former foster youth;
- Modifying the eligible educational expenses or the order in which financial assistance is applied to increase the amount of financial aid available to current and former foster youth for other educational expenses; and
- Encouraging on-campus support programs to help meet current and former foster youths' nonfinancial needs.

Response: Not applicable.

Response explanation: Recommendation 1.3 is directed to the Legislature

Finding 2: ABOR and community college districts should improve Programs' implementation

Recommendation 2.1: The community college districts, and ABOR in collaboration with the universities, should each review their policies and procedures for processing waiver applications to ensure that they provide adequate and appropriate guidance for verifying that applicants meet all eligibility requirements before awarding a waiver. As part of this review, they should ensure that the policies and procedures align with the eligibility requirements governing foster care tuition waivers and that appropriate community college district and university staff who process waiver applications have been trained on the policies and procedures.

Response: The finding of the Auditor General is agreed to and the audit recommendation will be implemented.

Response explanation: The Auditor General did not identify any material weaknesses with regard to policies and procedures or staff training at Coconino Community College. Coconino Community College has maintained compliance with respect to this recommendation for the entirety of the program's four-year existence and will continue to do so in the future. Recommendations that relate to best practice program improvements will be considered and implemented as needed.

Recommendation 2.2: If the community college districts, and if ABOR in collaboration with the universities, identify any deficiencies in their policies and procedures or training as part of their review, they should modify their policies and procedures and/or train all relevant staff as appropriate.

Response: The finding of the Auditor General is agreed to and the audit recommendation will be implemented.

Response explanation: The Auditor General did not identify any material weaknesses with regard to policies and procedures or staff training at Coconino Community College. Coconino Community College has maintained compliance with respect to this

recommendation for the entirety of the program's four-year existence and will continue to do so in the future.

Recommendation 2.3: The community college districts, and ABOR in collaboration with the universities, should each determine whether they will continue using an outside service provider to assist in the Programs' operation, and then implement one of the following options:

- If the community college districts, and if ABOR in collaboration with the universities, continue using an outside service provider, they should each enter into a contract with an outside service provider that clearly defines the roles, responsibilities, and requirements for each party, including how the outside service provider will be monitored, how the Programs' data will be managed, and when the Programs' application will be made available to applicants; or
- If the community college districts, and if ABOR in collaboration with the universities, do not continue using an outside service provider, they should each develop processes for:
 - Ensuring that applicants have a method for applying for the Programs, including how to evaluate recipients if the Programs are not continued;
 - Ensuring that applicants meet the foster care eligibility requirement;
 - Ensuring that the Programs' application(s) are opened and/or reviewed each semester on a date that ensures applicants have adequate opportunity to make critical decisions about their college attendance and seek additional financial aid; and
 - Ensuring that statutorily required volunteer hours are completed.

Response: The finding of the Auditor General is agreed to and the audit recommendation will be implemented.

Response explanation: ARS 15-1809 does not currently prescribe that a contract must be entered into between schools and FosterCare2Success, and therefore, Coconino has maintained compliance with respect to the current statute for the entirety of the program's four-year existence. Even though Coconino has never had any issues working with FosterCare2Success in the past, having a contract in place is a reasonable business practice and Coconino will implement this recommendation.

Recommendation 2.4: The community college districts, and ABOR in collaboration with the universities, should each develop and implement procedures for ensuring that applicants receive, understand, and have sufficient time to complete any required forms or documentation that the universities or community college districts may require as part of the application process, such as supplemental forms that require applicants to self-certify that they have met the waiver eligibility requirements.

Response: Other, see explanation below.

Response explanation: The Auditor General did not identify that applicants to Coconino Community College did not receive, understand, or have adequate opportunity to make critical decisions about their college attendance. Coconino Community College has

maintained compliance with timeliness for the entirety of the program's four-year existence and plans on continuing in the future.



June 23, 2017

Ms. Debbie Davenport
Auditor General
2910 N. 44th St., Ste. 410
Phoenix, AZ 85018

Dear Ms. Davenport:

Eastern Arizona College appreciates the opportunity to provide a response to the Arizona Foster Care Tuition Waiver Pilot Programs Audit conducted by your office that was received June 16, 2017.

Attached you will find Eastern Arizona College's response to the Auditor General's Audit Report. The college acknowledges and supports the majority of the Audit Findings and has provided responses and explanations for each finding and recommendation. The college has already begun to address recommendations specifically applicable to it as found in the audit.

The college would like to thank the auditors for their thorough and thoughtful review and the opportunities provided to discuss and recommend changes to the audit findings and recommendations.

Sincerely,

Mr. Mark Bryce, President
Eastern Arizona College

Finding 1: Programs have assisted recipients, but data management needs improvement, and changes to some requirements may increase Programs' reach

Recommendation 1.1: The community college districts, and ABOR in collaboration with the universities, should each establish processes for collecting and/or reporting data on the Programs using one of the following options:

- If each community college district, and if ABOR in collaboration with the universities, continue using an outside service provider to collect the Programs' data, they should develop and implement policies and procedures for providing accurate and consistent data to the outside service provider and ensure that all appropriate staff are trained on these policies and procedures; or
- If each community college district, and if ABOR in collaboration with the universities, do not continue using an outside service provider to collect the Programs' data, they should develop and implement policies and procedures for collecting key program data that the Provider currently collects, such as who applied for a waiver, who received a waiver, and the reasons waivers were denied, and ensure that all appropriate staff are trained on these policies and procedures.

Response: The finding of the Auditor General is agreed to and the audit recommendation will be implemented.

Response explanation: EAC prefers contracting with an outside service provider to collect Programs data required by the statute. The college will collaborate with other community college districts in creating required policies and procedures; creating some continuity within the system. EAC will train appropriate staff on these developed policies and procedures as recommended.

Recommendation 1.2: If the Legislature continues the Programs and determines that further assessment of their effectiveness should be performed, it should consider, in consultation with relevant stakeholders—including the community college districts and ABOR—what program outcome data, such as graduation and dropout rates, should be tracked and reported.

Response: Not applicable.

Response explanation: EAC will comply with further assessment criteria if said criteria are required by the Legislature.

Recommendation 1.3: If the Legislature determines to continue the Programs, it should consider studying, in consultation with relevant stakeholders, the impacts and increased costs of modifying some requirements or adding additional supports to expand the reach of the Programs, such as:

- Requiring the community college districts and ABOR, as well as other state agencies such as the Arizona Department of Child Safety, to coordinate outreach efforts to ensure all eligible current and former foster youth are aware of the Programs and receive correct information about them;

- Increasing the age cap on eligibility to better reflect the educational trajectory of former foster youth;
- Modifying the eligible educational expenses or the order in which financial assistance is applied to increase the amount of financial aid available to current and former foster youth for other educational expenses; and
- Encouraging on-campus support programs to help meet current and former foster youths' nonfinancial needs.

Response: Not applicable.

Response explanation: Should the Legislature modify the legislative requirements to include these recommendations EAC would comply. However, EAC is opposed to increasing the administrative burden without the Legislature providing any monetary support for the program. Unfunded federal and state mandates strain the ability of the current staff to effectively comply with expanded program requirements.

Finding 2: ABOR and community college districts should improve Programs' implementation

Recommendation 2.1: The community college districts, and ABOR in collaboration with the universities, should each review their policies and procedures for processing waiver applications to ensure that they provide adequate and appropriate guidance for verifying that applicants meet all eligibility requirements before awarding a waiver. As part of this review, they should ensure that the policies and procedures align with the eligibility requirements governing foster care tuition waivers and that appropriate community college district and university staff who process waiver applications have been trained on the policies and procedures.

Response: The finding of the Auditor General is agreed to and the audit recommendation will be implemented.

Response explanation: EAC will develop and implement Foster Care waiver eligibility policies and procedures for processing Foster Care applications based on Legislative requirements. EAC will ensure that adequate and appropriate guidance will be given to staff, based on these requirements, before awarding a Foster Care waiver.

Recommendation 2.2: If the community college districts, and if ABOR in collaboration with the universities, identify any deficiencies in their policies and procedures or training as part of their review, they should modify their policies and procedures and/or train all relevant staff as appropriate.

Response: The finding of the Auditor General is agreed to and the audit recommendation will be implemented.

Response explanation: EAC will review on an annual basis or as needed, its policies and procedures. Should deficiencies be identified, modify the policies and procedures and conduct staff training as appropriate.

Recommendation 2.3: The community college districts, and ABOR in collaboration with the universities, should each determine whether they will continue using an outside service provider to assist in the Programs' operation, and then implement one of the following options:

- If the community college districts, and if ABOR in collaboration with the universities, continue using an outside service provider, they should each enter into a contract with an outside service provider that clearly defines the roles, responsibilities, and requirements for each party, including how the outside service provider will be monitored, how the Programs' data will be managed, and when the Programs' application will be made available to applicants; or
- If the community college districts, and if ABOR in collaboration with the universities, do not continue using an outside service provider, they should each develop processes for:
 - Ensuring that applicants have a method for applying for the Programs, including how to evaluate recipients if the Programs are not continued;
 - Ensuring that applicants meet the foster care eligibility requirement;
 - Ensuring that the Programs' application(s) are opened and/or reviewed each semester on a date that ensures applicants have adequate opportunity to make critical decisions about their college attendance and seek additional financial aid; and
 - Ensuring that statutorily required volunteer hours are completed.

Response: The finding of the Auditor General is agreed to and the audit recommendation will be implemented.

Response explanation: EAC prefers the option of entering into a contract agreement with a third party and will ensure that the roles, responsibilities, and requirements to each party are clearly delineated. EAC is opposed to the second option as the administrative burden would be prohibitive without additional monetary support from the Legislature.

Recommendation 2.4: The community college districts, and ABOR in collaboration with the universities, should each develop and implement procedures for ensuring that applicants receive, understand, and have sufficient time to complete any required forms or documentation that the universities or community college districts may require as part of the application process, such as supplemental forms that require applicants to self-certify that they have met the waiver eligibility requirements.

Response: Other, see explanation below.

Response explanation: EAC has not and will not require Supplemental forms, to certify waiver eligibility. This recommendation puts the onus of the application process, previously done by a contractor, on community college districts. EAC does not have the personnel or resources that would be needed to administer a stand-alone Program.



June 22, 2017

Ms. Debbie Davenport
Office of the Auditor General
2910 N. 44th Street, Ste. 410
Phoenix, AZ 85018

Dear Ms. Davenport:

On behalf of the Maricopa County Community College District (MCCCD), I have attached our responses to the Arizona Foster Care Tuition Waiver Pilot Programs performance audit. We appreciate the opportunity afforded throughout the process to provide information on how the MCCCD administers the Foster Care Tuition Waiver benefit, and to provide clarity regarding our role as a political subdivision of the state of Arizona.

Providing access to higher education for disadvantaged populations is a critical mission component of our community college system. Continued outreach to the foster youth population and identification of pathways for certificate and degree completion is a fundamental part of our student affairs.

Sincerely,

Maria Harper-Marinick, Ph.D.
Chancellor

Finding 1: Programs have assisted recipients, but data management needs improvement, and changes to some requirements may increase Programs' reach

Recommendation 1.1: The community college districts, and ABOR in collaboration with the universities, should each establish processes for collecting and/or reporting data on the Programs using one of the following options:

- If each community college district, and if ABOR in collaboration with the universities, continue using an outside service provider to collect the Programs' data, they should develop and implement policies and procedures for providing accurate and consistent data to the outside service provider and ensure that all appropriate staff are trained on these policies and procedures; or
- If each community college district, and if ABOR in collaboration with the universities, do not continue using an outside service provider to collect the Programs' data, they should develop and implement policies and procedures for collecting key program data that the Provider currently collects, such as who applied for a waiver, who received a waiver, and the reasons waivers were denied, and ensure that all appropriate staff are trained on these policies and procedures.

Response: The finding of the Auditor General is agreed to and the audit recommendation will be implemented.

Response explanation: We will collaborate with our higher education partners, though as separate political subdivisions -- the development of policies, regulations and procedures are subject to the approval processes of each institution's governing body, executive leadership and internal control requirements for the expenditure of public funds.

Recommendation 1.2: If the Legislature continues the Programs and determines that further assessment of their effectiveness should be performed, it should consider, in consultation with relevant stakeholders—including the community college districts and ABOR—what program outcome data, such as graduation and dropout rates, should be tracked and reported.

Response: The finding of the Auditor General is agreed to and the audit recommendation will be implemented.

Response explanation: Should the program continue, we will continue to identify the best methodology for tracking in conjunction with our higher education partners.

Recommendation 1.3: If the Legislature determines to continue the Programs, it should consider studying, in consultation with relevant stakeholders, the impacts and increased costs of modifying some requirements or adding additional supports to expand the reach of the Programs, such as:

- Requiring the community college districts and ABOR, as well as other state agencies such as the Arizona Department of Child Safety, to coordinate outreach efforts to ensure all eligible current and former foster youth are aware of the Programs and receive correct information about them;

- Increasing the age cap on eligibility to better reflect the educational trajectory of former foster youth;
- Modifying the eligible educational expenses or the order in which financial assistance is applied to increase the amount of financial aid available to current and former foster youth for other educational expenses; and
- Encouraging on-campus support programs to help meet current and former foster youths' nonfinancial needs.

Response: The finding of the Auditor General is agreed to and a different method of dealing with the finding will be implemented.

Response explanation: The Maricopa County Community College District (MCCCD) will collaborate with key higher educational partners and agencies on outreach and recruitment activities with respect to awareness of the supplemental waiver benefit. As the funding mechanism for the MCCCD comes from property taxes and tuition paid by other students, an increase in age and a modification of the eligible educational expenses in order to increase aid would have an impact on our institution as the MCCCD does not receive state aid.

Finding 2: ABOR and community college districts should improve Programs' implementation

Recommendation 2.1: The community college districts, and ABOR in collaboration with the universities, should each review their policies and procedures for processing waiver applications to ensure that they provide adequate and appropriate guidance for verifying that applicants meet all eligibility requirements before awarding a waiver. As part of this review, they should ensure that the policies and procedures align with the eligibility requirements governing foster care tuition waivers and that appropriate community college district and university staff who process waiver applications have been trained on the policies and procedures.

Response: Other, see explanation below.

Response explanation: The MCCCD has in place policies, processes and procedures to ensure that applicants meet all eligibility requirements before awarding a waiver, wherein adjustments are routinely made to address procedural matters. These policies and procedures will be reviewed annually to ensure that eligibility requirements outlined in the statute are being adhered to. As is currently the practice in the administration of all types of tuition waivers, persons identified as being benefits eligible who were not awarded the benefit at the point of enrollment or up to the eligibility recalculation date will be reimbursed the amount of benefit that should have been applied.

Recommendation 2.2: If the community college districts, and if ABOR in collaboration with the universities, identify any deficiencies in their policies and procedures or training as part of their review, they should modify their policies and procedures and/or train all relevant staff as appropriate.

Response: The finding of the Auditor General is agreed to and the audit recommendation will be implemented.

Response explanation: The MCCCCD will continue to review its policies, processes and procedures on an annual bases and address and procedural deficiencies.

Recommendation 2.3: The community college districts, and ABOR in collaboration with the universities, should each determine whether they will continue using an outside service provider to assist in the Programs' operation, and then implement one of the following options:

- If the community college districts, and if ABOR in collaboration with the universities, continue using an outside service provider, they should each enter into a contract with an outside service provider that clearly defines the roles, responsibilities, and requirements for each party, including how the outside service provider will be monitored, how the Programs' data will be managed, and when the Programs' application will be made available to applicants; or
- If the community college districts, and if ABOR in collaboration with the universities, do not continue using an outside service provider, they should each develop processes for:
 - Ensuring that applicants have a method for applying for the Programs, including how to evaluate recipients if the Programs are not continued;
 - Ensuring that applicants meet the foster care eligibility requirement;
 - Ensuring that the Programs' application(s) are opened and/or reviewed each semester on a date that ensures applicants have adequate opportunity to make critical decisions about their college attendance and seek additional financial aid; and
 - Ensuring that statutorily required volunteer hours are completed.

Response: The finding of the Auditor General is agreed to and the audit recommendation will be implemented.

Response explanation: The MCCCCD will consult with other higher educational institutions in the state to identify and consider contractor options. If a single contractor is selected by all higher educational institutions, it is presumed that the contractor will be vetted according to state of Arizona procurement requirements. In addition, as part of the contract, the contractor would meet the contractual requirements of the MCCCCD for the handling of personal identifiable information.

Recommendation 2.4: The community college districts, and ABOR in collaboration with the universities, should each develop and implement procedures for ensuring that applicants receive, understand, and have sufficient time to complete any required forms or documentation that the universities or community college districts may require as part of the application process, such as supplemental forms that require applicants to self-certify that they have met the waiver eligibility requirements.

Response: The finding of the Auditor General is agreed to and the audit recommendation will be implemented.

Response explanation: If the program continues, MCCCCD would work with the contract provider in on the established timeline for processing, as well as internal procedures for benefit application. In addition, the MCCCCD will continue to support and serve this population through District Student Affairs and District Financial Aid Operations for the recruitment, outreach and awarding efforts. The verification of benefit eligibility is a priority for the MCCCCD and would continue. If the program is not continued, those recipients of the supplemental waiver would be evaluated through the term of their eligibility for the benefit.

20 June 2017

Ms. Debra K. Davenport, Auditor General
Office of the Auditor General
2910 North 44th Street, Suite 410
Phoenix, Arizona 85018

Dear Ms. Davenport:

Mohave Community College appreciates the opportunity to provide a response to the performance audit of the Arizona Foster Care Tuition Waiver Program conducted by your office that was received on June 16, 2017.

Attached is the District's response to your findings and recommendations. We look forward to sharing our progress in implementing these recommendations.

Sincerely,

Michael J. Kearns
President

**Mohave County
Community College
District Office**
1971 Jagerson Ave.
Kingman, AZ 86409

Bullhead City Campus
3400 Highway 95
Bullhead City, AZ 86442

Lake Havasu City Campus
1977 Acoma Blvd. West
Lake Havasu City, AZ 86403

Neal Campus - Kingman
1971 Jagerson Ave.
Kingman, AZ 86409

North Mohave Campus
480 S. Central
Colorado City, AZ 86021

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Finding 1: Programs have assisted recipients, but data management needs improvement, and changes to some requirements may increase Programs' reach

Recommendation 1.1: The community college districts, and ABOR in collaboration with the universities, should each establish processes for collecting and/or reporting data on the Programs using one of the following options:

- If each community college district, and if ABOR in collaboration with the universities, continue using an outside service provider to collect the Programs' data, they should develop and implement policies and procedures for providing accurate and consistent data to the outside service provider and ensure that all appropriate staff are trained on these policies and procedures; or
- If each community college district, and if ABOR in collaboration with the universities, do not continue using an outside service provider to collect the Programs' data, they should develop and implement policies and procedures for collecting key program data that the Provider currently collects, such as who applied for a waiver, who received a waiver, and the reasons waivers were denied, and ensure that all appropriate staff are trained on these policies and procedures.

Response: The finding of the Auditor General is agreed to and the audit recommendation will be implemented.

Response explanation: MCC will develop and implement policies and procedures for providing accurate and consistent data to the outside service provider and ensure that all appropriate staff are trained on these policies and procedures.

Recommendation 1.2: If the Legislature continues the Programs and determines that further assessment of their effectiveness should be performed, it should consider, in consultation with relevant stakeholders—including the community college districts and ABOR—what program outcome data, such as graduation and dropout rates, should be tracked and reported.

Response: The finding of the Auditor General is agreed to and the audit recommendation will be implemented.

Response explanation: MCC will consider, in consultation with relevant stakeholders what program outcome data, such as graduation and dropout rates, should be tracked and reported.

Recommendation 1.3: If the Legislature determines to continue the Programs, it should consider studying, in consultation with relevant stakeholders, the impacts and increased costs of modifying some requirements or adding additional supports to expand the reach of the Programs, such as:

- Requiring the community college districts and ABOR, as well as other state agencies such as the Arizona Department of Child Safety, to coordinate outreach efforts to ensure all eligible current and former foster youth are aware of the Programs and receive correct information about them;

- Increasing the age cap on eligibility to better reflect the educational trajectory of former foster youth;
- Modifying the eligible educational expenses or the order in which financial assistance is applied to increase the amount of financial aid available to current and former foster youth for other educational expenses; and
- Encouraging on-campus support programs to help meet current and former foster youths' nonfinancial needs.

Response: The finding of the Auditor General is agreed to and the audit recommendation will be implemented.

Response explanation: MCC will consider studying, in consultation with relevant stakeholders, the impacts and increased costs of modifying some requirements or adding additional supports to expand the reach of the Programs.

Finding 2: ABOR and community college districts should improve Programs' implementation

Recommendation 2.1: The community college districts, and ABOR in collaboration with the universities, should each review their policies and procedures for processing waiver applications to ensure that they provide adequate and appropriate guidance for verifying that applicants meet all eligibility requirements before awarding a waiver. As part of this review, they should ensure that the policies and procedures align with the eligibility requirements governing foster care tuition waivers and that appropriate community college district and university staff who process waiver applications have been trained on the policies and procedures.

Response: The finding of the Auditor General is agreed to and the audit recommendation will be implemented.

Response explanation: MCC will review their policies and procedures for processing waiver applications to ensure that they provide adequate and appropriate guidance for verifying that applicants meet all eligibility requirements before awarding a waiver.

Recommendation 2.2: If the community college districts, and if ABOR in collaboration with the universities, identify any deficiencies in their policies and procedures or training as part of their review, they should modify their policies and procedures and/or train all relevant staff as appropriate.

Response: The finding of the Auditor General is agreed to and the audit recommendation will be implemented.

Response explanation: If MCC identifies any deficiencies in their policies and procedures or training as part of their review, they will modify their policies and procedures and/or train all relevant staff as appropriate.

Recommendation 2.3: The community college districts, and ABOR in collaboration with the universities, should each determine whether they will continue using an outside service provider to assist in the Programs' operation, and then implement one of the following options:

- If the community college districts, and if ABOR in collaboration with the universities, continue using an outside service provider, they should each enter into a contract with an outside service provider that clearly defines the roles, responsibilities, and requirements for each party, including how the outside service provider will be monitored, how the Programs' data will be managed, and when the Programs' application will be made available to applicants; or
- If the community college districts, and if ABOR in collaboration with the universities, do not continue using an outside service provider, they should each develop processes for:
 - Ensuring that applicants have a method for applying for the Programs, including how to evaluate recipients if the Programs are not continued;
 - Ensuring that applicants meet the foster care eligibility requirement;
 - Ensuring that the Programs' application(s) are opened and/or reviewed each semester on a date that ensures applicants have adequate opportunity to make critical decisions about their college attendance and seek additional financial aid; and
 - Ensuring that statutorily required volunteer hours are completed.

Response: The finding of the Auditor General is agreed to and the audit recommendation will be implemented.

Response explanation: MCC will continue using an outside service provider and enter into a contract with an outside service provider that clearly defines the roles, responsibilities, and requirements for each party.

Recommendation 2.4: The community college districts, and ABOR in collaboration with the universities, should each develop and implement procedures for ensuring that applicants receive, understand, and have sufficient time to complete any required forms or documentation that the universities or community college districts may require as part of the application process, such as supplemental forms that require applicants to self-certify that they have met the waiver eligibility requirements.

Response: The finding of the Auditor General is agreed to and the audit recommendation will be implemented.

Response explanation: MCC will develop and implement procedures for ensuring that applicants receive, understand, and have sufficient time to complete any required forms or documentation as part of the application process.



NORTHLAND PIONEER COLLEGE

Office of the President

June 22, 2017

Debbie Davenport

State of Arizona Office of the Auditor General

Please find attached Northland Pioneer College's response, as requested, to the performance audit of the Arizona Foster Care Tuition Waiver Pilot Program. If there are further inquiries, please don't hesitate to contact my office.

Sincerely,

Jeanne Swarthout, Ph.D.

President

Northland Pioneer College

Northland Pioneer College Response to findings from the Auditor General's Office related to the implementation of the Arizona Foster Care Tuition Waiver Pilot Programs

Finding 1: Programs have assisted recipients, but data management needs improvement, and changes to some requirements may increase Programs' reach

Recommendation 1.1: The community college districts, and ABOR in collaboration with the universities, should each establish processes for collecting and/or reporting data on the Programs using one of the following options:

- If each community college district, and if ABOR in collaboration with the universities, continue using an outside service provider to collect the Programs' data, they should develop and implement policies and procedures for providing accurate and consistent data to the outside service provider and ensure that all appropriate staff are trained on these policies and procedures; or
- If each community college district, and if ABOR in collaboration with the universities, do not continue using an outside service provider to collect the Programs' data, they should develop and implement policies and procedures for collecting key program data that the Provider currently collects, such as who applied for a waiver, who received a waiver, and the reasons waivers were denied, and ensure that all appropriate staff are trained on these policies and procedures.

Response: The finding of the Auditor General is not agreed to and the recommendation will not be implemented.

Response explanation: Northland Pioneer College has implemented the required policies and procedures for the pilot program and is participating in the tuition waiver program consistent with current law. However, none (0) of the Northland Pioneer College Waiver Applicants were deemed eligible for a tuition waiver. This determination was based on the information received within the FAFSA and the college admissions process after notification from the Foster Care service provider. The Foster Care service provider verifies eligibility regarding the age (16) and the applicant's status in the program. Once status is determined the Foster Care organization submits this information into the database and then notifies the college. Waiver Applicants are required to fill out the FAFSA before being considered for the tuition waiver. Northland Pioneer College uses the FAFSA to determine the student's citizenship status as students who have completed a FAFSA will have already verified lawful presence in the U.S. The applicant must be in an accredited degree or certificate program to qualify for this waiver. After the first academic year the student must demonstrate that they have completed 30 hours of volunteer service before they can be eligible to receive the next tuition waiver. The volunteer hours are monitored and substantiated by the Foster Care service provider. The institution has policies and procedures on how to maintain good standing, and on how to handle the Federal FAFSA and other funds. The FAFSA is the main tool used in determining eligibility in the waiver program and is where we find the required information needed to comply with the statute.

Recommendation 1.2: If the Legislature continues the Programs and determines that further assessment of their effectiveness should be performed, it should consider, in consultation with relevant stakeholders—including the community college districts and ABOR—what program outcome data, such as graduation and dropout rates, should be tracked and reported.

Northland Pioneer College Response to findings from the Auditor General's Office related to the implementation of the Arizona Foster Care Tuition Waiver Pilot Programs

Response: Not applicable.

Response explanation: This recommendation is outside the purview of Northland Pioneer College, as the Legislature will make that assessment and future law. The statute does not currently require institutions to determine what outcome data should be tracked. Northland Pioneer College has complied with the law as outcomes reporting are outside of the current scope of Arizona Revised Statute 15-1809. Should the legislature desire to continue the program, and if the recommendations outlined by the Auditor General are accepted, additional resources should be provided the universities and colleges for this extensive data collection activity.

Recommendation 1.3: If the Legislature determines to continue the Programs, it should consider studying, in consultation with relevant stakeholders, the impacts and increased costs of modifying some requirements or adding additional supports to expand the reach of the Programs, such as:

- Requiring the community college districts and ABOR, as well as other state agencies such as the Arizona Department of Child Safety, to coordinate outreach efforts to ensure all eligible current and former foster youth are aware of the Programs and receive correct information about them;
- Increasing the age cap on eligibility to better reflect the educational trajectory of former foster youth;
- Modifying the eligible educational expenses or the order in which financial assistance is applied to increase the amount of financial aid available to current and former foster youth for other educational expenses; and
- Encouraging on-campus support programs to help meet current and former foster youths' nonfinancial needs.

Response: Not applicable.

Response explanation: This recommendation is only within the purview of the Arizona State Legislature and does not apply to universities and community colleges. Northland Pioneer College has complied with the current law. Arizona Revised Statute 15-1809 does not currently require institutions to comply with the recommendation listed above. Should the legislature desire to continue the program, and if the recommendation outlined by the Auditor General is accepted, additional resources should be provided the universities and colleges for these extensive activities.

Northland Pioneer College Response to findings from the Auditor General's Office related to the implementation of the Arizona Foster Care Tuition Waiver Pilot Programs

Finding 2: ABOR and community college districts should improve Programs' implementation

Recommendation 2.1: The community college districts, and ABOR in collaboration with the universities, should each review their policies and procedures for processing waiver applications to ensure that they provide adequate and appropriate guidance for verifying that applicants meet all eligibility requirements before awarding a waiver. As part of this review, they should ensure that the policies and procedures align with the eligibility requirements governing foster care tuition waivers and that appropriate community college district and university staff who process waiver applications have been trained on the policies and procedures.

Response: Other, see explanation below.

Response explanation: The statute does not currently specify operational methods such as those recommended. Northland Pioneer College's policies and procedures are currently in full compliance with the wording of Arizona Revised Statute 15-1809 including all applicable eligibility and funding requirements.

Recommendation 2.2: If the community college districts, and if ABOR in collaboration with the universities, identify any deficiencies in their policies and procedures or training as part of their review, they should modify their policies and procedures and/or train all relevant staff as appropriate.

Response: The finding of the Auditor General is agreed to and the audit recommendation will be implemented.

Response explanation: If any deficiencies in Northland Pioneer College policies and procedures are found, the college will modify them and train staff accordingly. The college's Financial Aid Office has made necessary updates to policy and procedure and ensured that financial aid staff are trained on all applicable changes.

Recommendation 2.3: The community college districts, and ABOR in collaboration with the universities, should each determine whether they will continue using an outside service provider to assist in the Programs' operation, and then implement one of the following options:

- If the community college districts, and if ABOR in collaboration with the universities, continue using an outside service provider, they should each enter into a contract with an outside service provider that clearly defines the roles, responsibilities, and requirements for each party, including how the outside service provider will be monitored, how the Programs' data will be managed, and when the Programs' application will be made available to applicants; or
- If the community college districts, and if ABOR in collaboration with the universities, do not continue using an outside service provider, they should each develop processes for:
 - Ensuring that applicants have a method for applying for the Programs, including how to evaluate recipients if the Programs are not continued;
 - Ensuring that applicants meet the foster care eligibility requirement;

Northland Pioneer College Response to findings from the Auditor General's Office related to the implementation of the Arizona Foster Care Tuition Waiver Pilot Programs

- Ensuring that the Programs' application(s) are opened and/or reviewed each semester on a date that ensures applicants have adequate opportunity to make critical decisions about their college attendance and seek additional financial aid; and
- Ensuring that statutorily required volunteer hours are completed.

Response: The finding of the Auditor General is not agreed to and the recommendation will not be implemented.

Response explanation: The statute does not currently specify operational methods such as those recommended. Northland Pioneer College is currently in full compliance with the wording of Arizona Revised Statute 15-1809 without contractual arrangements. None (0) of the Northland Pioneer College Waiver Applicants were deemed eligible for a tuition waiver. The institutional procedure for determining eligibility is outlined in our response explanation to **Recommendation 1.1**. Should the legislature desire to continue the program, and if the recommendation outlined by the Auditor General is approved, additional resources should be provided the universities and colleges for these required operating activities.

Recommendation 2.4: The community college districts, and ABOR in collaboration with the universities, should each develop and implement procedures for ensuring that applicants receive, understand, and have sufficient time to complete any required forms or documentation that the universities or community college districts may require as part of the application process, such as supplemental forms that require applicants to self-certify that they have met the waiver eligibility requirements.

Response: Other, see explanation below.

Response explanation: The statute does not currently specify operational methods such as those recommended. Northland Pioneer College is currently in full compliance with the wording of Arizona Revised Statute 15-1809 with our revised policies and procedures. Should the legislature desire to continue the program, and if the recommendation outlined by the Auditor General is approved, additional resources should be provided the universities and colleges for these required operating activities.



PimaCountyCommunityCollegeDistrict

District Office

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May 2017

Debra K. Davenport, CPA
Auditor General
Office of the Auditor General
2910 North 44th Street, Suite 410
Phoenix, AZ 85018

Please accept the attached response to the **Arizona Foster Care Tuition Waiver Programs Audit from Pima Community College.**

Best,

Dolores Durán-Cerda, Ph.D.
Acting Provost and Executive Vice Chancellor
Pima Community College

Finding 1: Programs have assisted recipients, but data management needs improvement, and changes to some requirements may increase Programs' reach

Recommendation 1.1: The community college districts, and ABOR in collaboration with the universities, should each establish processes for collecting and/or reporting data on the Programs using one of the following options:

- If each community college district, and if ABOR in collaboration with the universities, continue using an outside service provider to collect the Programs' data, they should develop and implement policies and procedures for providing accurate and consistent data to the outside service provider and ensure that all appropriate staff are trained on these policies and procedures; or
- If each community college district, and if ABOR in collaboration with the universities, do not continue using an outside service provider to collect the Programs' data, they should develop and implement policies and procedures for collecting key program data that the Provider currently collects, such as who applied for a waiver, who received a waiver, and the reasons waivers were denied, and ensure that all appropriate staff are trained on these policies and procedures.

Response: The finding of the Auditor General is agreed to and the audit recommendation will be implemented.

Response explanation: : The finding is correct in substance; however, the finding does not include the lack of a coordinated state effort for this program. The state of Arizona does not have a coordinated, central state authority that provides procedural guidance. The recommended corrective action is dependent upon all the community college districts and ABOR to form a group to work with the legislature, as well as other state agencies. There is no central liaison identified to begin this process and resources allocated to support a statewide initiative.

Recommendation 1.2: If the Legislature continues the Programs and determines that further assessment of their effectiveness should be performed, it should consider, in consultation with relevant stakeholders—including the community college districts and ABOR—what program outcome data, such as graduation and dropout rates, should be tracked and reported.

Response: The finding of the Auditor General is agreed to and the audit recommendation will be implemented.

Response explanation: The finding is correct in substance; however, the finding does not include the lack of a coordinated state effort for this program. The state of Arizona does not have a coordinated, central state authority that provides procedural guidance. The recommended corrective action is dependent upon all the community college districts and ABOR to form a group to work with the legislature, as well as other state agencies. There is no central liaison identified to begin this process and resources allocated to support a statewide initiative.

Recommendation 1.3: If the Legislature determines to continue the Programs, it should consider studying, in consultation with relevant stakeholders, the impacts and increased costs of modifying some requirements or adding additional supports to expand the reach of the Programs, such as:

- Requiring the community college districts and ABOR, as well as other state agencies such as the Arizona Department of Child Safety, to coordinate outreach efforts to ensure all eligible current and former foster youth are aware of the Programs and receive correct information about them;
- Increasing the age cap on eligibility to better reflect the educational trajectory of former foster youth;
- Modifying the eligible educational expenses or the order in which financial assistance is applied to increase the amount of financial aid available to current and former foster youth for other educational expenses; and
- Encouraging on-campus support programs to help meet current and former foster youths' nonfinancial needs.

Response: The finding of the Auditor General is agreed to and the audit recommendation will be implemented.

Response explanation: The finding is correct in substance; however, the finding does not include the lack of a coordinated state effort for this program. The state of Arizona does not have a coordinated, central state authority that provides procedural guidance. The recommended corrective action is dependent upon all the community college districts and ABOR to form a group to work with the legislature, as well as other state agencies. There is no central liaison identified to begin this process and resources allocated to support a statewide initiative.

Finding 2: ABOR and community college districts should improve Programs' implementation

Recommendation 2.1: The community college districts, and ABOR in collaboration with the universities, should each review their policies and procedures for processing waiver applications to ensure that they provide adequate and appropriate guidance for verifying that applicants meet all eligibility requirements before awarding a waiver. As part of this review, they should ensure that the policies and procedures align with the eligibility requirements governing foster care tuition waivers and that appropriate community college district and university staff who process waiver applications have been trained on the policies and procedures.

Response: The finding of the Auditor General is agreed to and the audit recommendation will be implemented.

Response explanation: The finding is correct in substance; however, the finding does not include the lack of a coordinated state effort for this program. The state of Arizona does not have a coordinated, central state authority that provides procedural guidance. The recommended corrective action is dependent upon all the community college districts and ABOR to form a group to work with the legislature, as well as other state agencies. There is no central liaison identified to begin this process and resources allocated to support a statewide initiative.

Recommendation 2.2: If the community college districts, and if ABOR in collaboration with the universities, identify any deficiencies in their policies and procedures or training as part of their review, they should modify their policies and procedures and/or train all relevant staff as appropriate.

Response: The finding of the Auditor General is agreed to and the audit recommendation will be implemented.

Response explanation: The finding is correct in substance; however, the finding does not include the lack of a coordinated state effort for this program. The state of Arizona does not have a coordinated, central state authority that provides procedural guidance. The recommended corrective action is dependent upon all the community college districts and ABOR to form a group to work with the legislature, as well as other state agencies. There is no central liaison identified to begin this process and resources allocated to support a statewide initiative.

Recommendation 2.3: The community college districts, and ABOR in collaboration with the universities, should each determine whether they will continue using an outside service provider to assist in the Programs' operation, and then implement one of the following options:

- If the community college districts, and if ABOR in collaboration with the universities, continue using an outside service provider, they should each enter into a contract with an outside service provider that clearly defines the roles, responsibilities, and requirements for each party, including how the outside service provider will be monitored, how the Programs' data will be managed, and when the Programs' application will be made available to applicants; or
- If the community college districts, and if ABOR in collaboration with the universities, do not continue using an outside service provider, they should each develop processes for:
 - Ensuring that applicants have a method for applying for the Programs, including how to evaluate recipients if the Programs are not continued;
 - Ensuring that applicants meet the foster care eligibility requirement;
 - Ensuring that the Programs' application(s) are opened and/or reviewed each semester on a date that ensures applicants have adequate opportunity to make critical decisions about their college attendance and seek additional financial aid; and
 - Ensuring that statutorily required volunteer hours are completed.

Response: The finding of the Auditor General is agreed to and a different method of dealing with the finding will be implemented.

Response explanation: The finding is correct in substance; however, the finding does not include the lack of a coordinated state effort for this program. The state of Arizona does not have a coordinated, central state authority that provides procedural guidance. The recommended corrective action is dependent upon all the community college districts and ABOR to form a group to work with the legislature, as well as other state agencies. There is no central liaison identified to begin this process and resources allocated to support a statewide initiative.

Recommendation 2.4: The community college districts, and ABOR in collaboration with the universities, should each develop and implement procedures for ensuring that applicants receive, understand, and have sufficient time to complete any required forms or documentation that the universities or community college districts may require as part of the application process, such as supplemental forms that require applicants to self-certify that they have met the waiver eligibility requirements.

Response: The finding of the Auditor General is agreed to and the audit recommendation will be implemented.

Response explanation: The finding is correct in substance; however, the finding does not include the lack of a coordinated state effort for this program. The state of Arizona does not have a coordinated, central state authority that provides procedural guidance. The recommended corrective action is dependent upon all the community college districts and ABOR to form a group to work with the legislature, as well as other state agencies. There is no central liaison identified to begin this process and resources allocated to support a statewide initiative.

Ms. Debbie Davenport, Auditor General
Office of the Auditor General
2910 N 44th Street, Ste. 410
Phoenix, AZ 85018

Dear Ms. Davenport,

Attached, please find the responses of the Arizona Foster Care Tuition Waiver Pilot Programs from Yavapai College. We understand the importance of this program, and look forward to its continuation.

It has been a pleasure working with your office.

If you have any questions, please contact me at:

Diana Dowling
Diana.Dowling@yc.edu
928.776.2391

Finding 1: Programs have assisted recipients, but data management needs improvement, and changes to some requirements may increase Programs' reach

Recommendation 1.1: The community college districts, and ABOR in collaboration with the universities, should each establish processes for collecting and/or reporting data on the Programs using one of the following options:

- If each community college district, and if ABOR in collaboration with the universities, continue using an outside service provider to collect the Programs' data, they should develop and implement policies and procedures for providing accurate and consistent data to the outside service provider and ensure that all appropriate staff are trained on these policies and procedures; or
- If each community college district, and if ABOR in collaboration with the universities, do not continue using an outside service provider to collect the Programs' data, they should develop and implement policies and procedures for collecting key program data that the Provider currently collects, such as who applied for a waiver, who received a waiver, and the reasons waivers were denied, and ensure that all appropriate staff are trained on these policies and procedures.

Response: The finding of the Auditor General is agreed to and the audit recommendation will be implemented.

Response explanation: Yavapai College utilizes the FosterCare2Success website to collect and track information and has maintained compliance by using this service provider. If the community college districts decide not to use the contracted outside service provider, then the college would implement a mechanism for collecting key data as prescribed by law. Yavapai College has limited funding and staff and would need additional operational funding from the state in order to collect key data.

Recommendation 1.2: If the Legislature continues the Programs and determines that further assessment of their effectiveness should be performed, it should consider, in consultation with relevant stakeholders—including the community college districts and ABOR—what program outcome data, such as graduation and dropout rates, should be tracked and reported.

Response: Not applicable.

Response explanation: Yavapai College has been informed by the Arizona Auditor General that this finding is targeted towards the Arizona State Legislature and that no response from the College is needed.

Recommendation 1.3: If the Legislature determines to continue the Programs, it should consider studying, in consultation with relevant stakeholders, the impacts and increased costs of modifying some requirements or adding additional supports to expand the reach of the Programs, such as:

- Requiring the community college districts and ABOR, as well as other state agencies such as the Arizona Department of Child Safety, to coordinate outreach efforts to ensure all eligible current and former foster youth are aware of the Programs and receive correct information about them;
- Increasing the age cap on eligibility to better reflect the educational trajectory of former foster youth;
- Modifying the eligible educational expenses or the order in which financial assistance is applied to increase the amount of financial aid available to current and former foster youth for other educational expenses; and
- Encouraging on-campus support programs to help meet current and former foster youths' nonfinancial needs.

Response: Not applicable.

Response explanation: Yavapai College has been informed by the Arizona Auditor General that this finding is targeted towards the Arizona State Legislature and that no response from the College is needed.

Finding 2: ABOR and community college districts should improve Programs' implementation

Recommendation 2.1: The community college districts, and ABOR in collaboration with the universities, should each review their policies and procedures for processing waiver applications to ensure that they provide adequate and appropriate guidance for verifying that applicants meet all eligibility requirements before awarding a waiver. As part of this review, they should ensure that the policies and procedures align with the eligibility requirements governing foster care tuition waivers and that appropriate community college district and university staff who process waiver applications have been trained on the policies and procedures.

Response: The finding of the Auditor General is agreed to and the audit recommendation will be implemented.

Response explanation: Yavapai College currently verifies that applicants meet eligibility requirements. Recommendations that relate to best practice program improvements will be considered and implemented as needed.

Recommendation 2.2: If the community college districts, and if ABOR in collaboration with the universities, identify any deficiencies in their policies and procedures or training as part of their review, they should modify their policies and procedures and/or train all relevant staff as appropriate.

Response: The finding of the Auditor General is agreed to and the audit recommendation will be implemented.

Response explanation: Yavapai College regularly reviews their policies and procedures for deficiencies and trains staff accordingly.

Recommendation 2.3: The community college districts, and ABOR in collaboration with the universities, should each determine whether they will continue using an outside service provider to assist in the Programs' operation, and then implement one of the following options:

- If the community college districts, and if ABOR in collaboration with the universities, continue using an outside service provider, they should each enter into a contract with an outside service provider that clearly defines the roles, responsibilities, and requirements for each party, including how the outside service provider will be monitored, how the Programs' data will be managed, and when the Programs' application will be made available to applicants; or
- If the community college districts, and if ABOR in collaboration with the universities, do not continue using an outside service provider, they should each develop processes for:
 - Ensuring that applicants have a method for applying for the Programs, including how to evaluate recipients if the Programs are not continued;
 - Ensuring that applicants meet the foster care eligibility requirement;
 - Ensuring that the Programs' application(s) are opened and/or reviewed each semester on a date that ensures applicants have adequate opportunity to make critical decisions about their college attendance and seek additional financial aid; and
 - Ensuring that statutorily required volunteer hours are completed.

Response: The finding of the Auditor General is agreed to and the audit recommendation will be implemented.

Response explanation: If Yavapai College discontinued using FosterCare2Success, then Yavapai College would ensure that applicants have a method for applying for the Programs, ensure they meet the foster care eligibility requirement, ensure the Programs' applications(s) are opened and/or reviewed each semester on a date that ensures applicants

have adequate opportunity to make critical decisions about their college attendance and seek additional financial aid and ensure that statutorily required volunteer hours are completed. Yavapai College has minimal funding and staffing and would need additional operational funding from the state to replace services currently provided by FosterCare2Success.

Recommendation 2.4: The community college districts, and ABOR in collaboration with the universities, should each develop and implement procedures for ensuring that applicants receive, understand, and have sufficient time to complete any required forms or documentation that the universities or community college districts may require as part of the application process, such as supplemental forms that require applicants to self-certify that they have met the waiver eligibility requirements.

Response: The finding of the Auditor General is agreed to and the audit recommendation will be implemented.

Response explanation: The Auditor General did not identify any material weaknesses with regard to the application process at Yavapai College. Yavapai College believes that the process offered by FosterCare2Success works well and that students have sufficient time to complete their forms