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The Office of Federal Student Aid: The Federal Government's First Performance-Based Organization

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Summary

The Office of Federal Student Aid (FSA) manages and administers all federally funded student financial assistance programs authorized under Title IV of the Higher Education Act of 1965 (HEA). The Title IV programs have grown significantly since the enactment of the title in 1965. Currently, an estimated $55 billion in grants and loans is provided to students annually. There are approximately 5,300 schools, 4,100 lenders, and 36 guaranty agencies that participate in the Title IV programs. Furthermore, 13 separate computer systems, operated by multiple contractors, are used to administer the programs.

In the 1998 Amendments to the HEA of 1965 (P.L. 105-244), Congress authorized the establishment of the federal government's first performance-based organization (PBO), the Office of Federal Student Aid, as a way to improve the efficacy and efficiency of student aid delivery, and make it less expensive. As a PBO, FSA receives wider discretion in areas such as hiring of personnel and equipment acquisition, in exchange for establishing more easily measured performance goals and objectives.

Since its inception as a PBO, FSA has used three broad measures to gauge its success: customer satisfaction, employee satisfaction and a reduction in the cost of administering the student financial assistance programs. It has been 5 years since Congress designated FSA as a PBO and the office has experienced varying degrees of success in each area.

This report provides an overview of the authorizing legislation for the PBO, including the organization's purpose, structure and goals. The report concludes with a discussion of program and policy matters related to FSA's status as a PBO over the last 5 years. It will be revised to reflect any substantive changes in the office's structure or goals.

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Introduction

In the 1998 Amendments to the Higher Education Act of 1965 (HEA, P.L. 105-244) Congress authorized the establishment of the federal governments's first performance-based organization (PBO), the Office of Federal Student Aid (FSA).[1] The legislation to create the PBO responded to a widespread belief that the U.S. Department of Education (ED), and FSA specifically, needed significant restructuring. Congress designated FSA as a PBO to release it from many of the traditional constraints associated with a government agency, and to enable FSA to focus on programs and customer service. As a PBO, FSA receives wider discretion in areas such as hiring of personnel and equipment acquisition, in exchange for establishing measurable performance goals and objectives, reducing the costs of administering the student financial assistance programs and improving customer satisfaction.

This report provides an overview of PBOs in general and FSA specifically, including FSA's purpose, structure and goals. The report concludes with a discussion of selected program and policy matters related to FSA's status as a PBO over the last 5 years.

Transforming Student Financial Assistance: FSA Becomes a PBO

Performance-Based Organizations

PBOs in the United States federal government are modeled after the British public service reform efforts of the late 1980s. PBOs are results-driven organizations that attempt to deliver the best possible services to their customers. PBOs are to have clear objectives and measurable goals that are intended to increase the agency's accountability and improve performance. In exchange, PBOs are granted discretion to operate more like private sector corporations, having more control over their budget, personnel decisions and procurement.[2] The establishment of PBOs in the

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[1] HEA, Title I, Sections 141-143.

[2] For additional reading on performance based organizations see Alasdair Roberts,
(continued...)

United States government was a part of the government reform efforts during the Clinton Administration. Under the auspices of the National Performance Review (NPR, also known as the National Partnership for Reinventing Government), Vice-President Gore proposed the establishment of PBOs as a means of saving money and providing more efficient and improved services to customers. NPR literature on the implementation of PBOs quotes the Vice-President endorsing PBOs, "For these PBOs, we're going to toss out the restrictive rules that keep them from doing business like a business. All the red tape, personnel rules that keep managers from using people effectively, the budget restrictions that make planning or allocating resources almost impossible."[3] Although the Executive Branch did not initially consider FSA a candidate for conversion to a PBO Congress designated FSA as a PBO in the 1998 Amendments to the HEA, making it the federal government's first performance-based organization.

Improving Student Aid Delivery

FSA manages and administers all federally funded student financial assistance programs authorized under Title IV of the Higher Education Act. When Congress enacted the HEA in 1965, two new financial aid programs were also created-Guaranteed Student Loans and Education Opportunity Grants-and administration of the Federal Work-Study program was assigned to the Office of Education. Over the years, Congress established additional federal financial aid programs, which produced an operation that annually provides an estimated $55 billion in grants and loans to students, and interacts with approximately 5,300 schools, 4,100 lenders and 36 guaranty agencies.[4] Furthermore, this operation uses 13 separate computer systems and several contractors. In addition, FSA's programs continue to be included in the General Accounting Office's (GAO) list of *high risk* programs.[5]

During the 1998 reauthorization, Congress acted to improve ED's management of the federal financial aid programs.[6] The 1998 Amendments to the HEA created the PBO as a way to more effectively administer the programs. As noted in the House Committee on Education and the Workforce's Report on H.R. 6 (Higher Education Act Amendments of 1998), "The need for this provision [creating a PBO]

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[2] (...continued)
"Performance-Based Organizations: Assessing the Gore Plan," *Public Administration Review*, vol. 57, 1997, pp. 465-478.

[3] Ibid.

[4] General Accounting Office, *Federal Student Aid: Additional Management Improvements Would Clarify Strategic Direction and Enhance Accountability*, GAO-02-255. (Hereafter cited as GAO, *Federal Student Aid*.)

[5] In 1990, GAO began reviewing and reporting on federal programs that were considered high risk because they were especially vulnerable to fraud, waste, and abuse.

[6] For additional reading see the Advisory Committee on Student Financial Assistance's reports: *The PBO and Modernization: Progress to Date* (Nov. 1999) and *The Advisory Committee's PBO Recommendations to the Congress and the Secretary of Education* (Nov. 30, 1999). For copies of these documents contact the Advisory Committee on Student Financial Assistance at [http://www.ADV_COMSFA@ED.GOV].

arises from the inability of the Department of Education to adequately manage over $40 billion in student financial aid .... Also, the Department's budget for student aid information systems has tripled over the last 5 years and instead of consolidating its existing data systems, the Department has increased the number of system contracts that cannot share data with each other." The Committee maintained that converting FSA to a PBO, managed by a Chief Operating Officer (COO), would significantly improve the efficacy and efficiency of student aid delivery, and make it less expensive.

As noted in the HEA, Section 141(a)(2), FSA's purposes as a PBO are to:

- improve service to students and other participants in the student financial assistance programs authorized under Title IV, including making those programs more understandable to students and their parents;
- reduce the costs of administering Title IV programs;
- increase accountability of the persons responsible for administering the operations of these programs;
- provide greater flexibility in the management of the student aid programs;
- integrate the information systems supporting the student aid programs;
- implement an open, common, integrated system for student aid delivery; and
- develop and maintain a student aid system that contains complete, accurate, and timely data to ensure program integrity.

FSA operates as a "discrete management" unit within ED, but the Secretary of Education maintains responsibility for the development and promulgation of policy and regulations relating to these programs. However, the Secretary is directed to consult with the Chief Operating Officer of FSA in developing policies and regulations that pertain to these programs (discussed later in this report). FSA maintains independent control of its budget allocations and expenditures, personnel decisions and processes, procurement and other administrative and management functions.

Organization

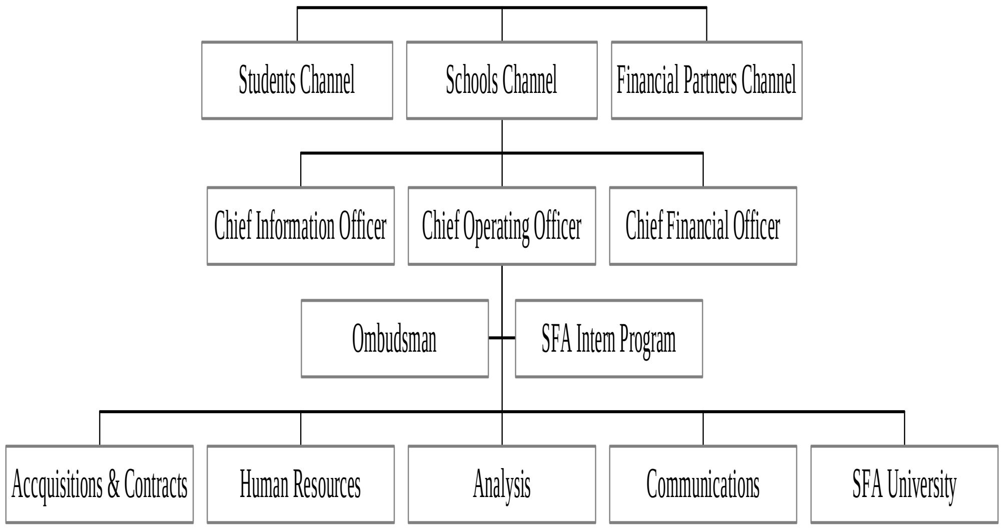
Upon receiving PBO designation, all of the operations and employees from the Office of Postsecondary Education (OPE) that pertained to student financial assistance were relocated to the newly created PBO. Congress specified that FSA should be headed by a non-partisan, independent, chief operating officer. Each COO is to be appointed by the Secretary of Education, and serve for a term of not less than 3 years and no more than 5 years; however, he/she can be reappointed for subsequent terms with the same time restrictions. The COO is expected to have demonstrated management experience and ability in information technology and financial systems. The COO serves under the terms of a pre-specified performance agreement that identifies measurable goals and expected results.

As mentioned earlier, as a PBO, FSA has sole discretion over its personnel decisions. The COO is authorized to determine the number of senior mangers that he/she needs, as well as make appointments. The selected senior managers are appointed without regard for the provisions of the federal government's competitive service rules. Under the first COO, Greg Woods, FSA was organized into *channels* that focus on types of customers as opposed to programs. The channels are: schools, students, and financial partners. By organizing the offices and services by customer types as opposed to program areas, customers receive a single point of contact for all financial aid matters, which is expected to improve customer satisfaction. For example, the "schools channel" is responsible for all aspects of the financial aid process that pertain to schools, such as financial aid origination and disbursement. Each of the channels is headed by a general manager, who is responsible for overseeing all of the activities in his/her respective channel.

Congress also required that the newly appointed COO select a Student Loan Ombudsman who is responsible for providing assistance to student loan borrowers. The Ombudsman is charged with informally resolving complaints regarding student loans and compiling and analyzing data and making policy recommendations as necessary.

To support the efforts of all of the newly established divisions, an *Enterprise Service* division was created. This division consists of offices, such as Human Resources, that are responsible for hiring new personnel, training and developing current personnel and acquiring technology equipment. Similar to private sector corporations, FSA also has a chief financial officer (CFO), who is responsible for management of FSA's finances, and a chief information officer (CIO) who handles the acquisition and management of the information systems within FSA. As illustrated by **Figure 1** (prepared by ED), the offices shown at the bottom of the chart constitute the Enterprise Services. They provide support and assistance to all of the offices within FSA. Further, ED places the channel managers at the top of the organizational chart to highlight the importance of their work — serving FSA's customers.

Figure 1. Student Financial Assistance Organization Chart



Source: Office of Federal Student Aid, 2002.

Measuring Performance

Since its inception FSA has had three broad measures to gauge its success: customer satisfaction, employee satisfaction and reduction of the administration costs for the student financial assistance programs. In consultation with the Secretary, each year the COO prepares an annual performance plan that outlines the tasks that FSA expects to accomplish in the upcoming year. Currently in its fifth year, FSA continues to work towards achieving these objectives, with varying degrees of success in each.

Customer Satisfaction. As noted earlier, FSA's customers are students, financial institutions and schools. Although each of these groups has a common interest — financial assistance — the organization of OPE, poor communication between programs and poor customer service were general complaints from all groups of customers prior to 1998. Because the interests of customers varied, different systems were required to cater to each channel's respective customers. In addition to aligning the offices and therefore the programs within each office to address the needs of its customers, a general manager was appointed to each channel and given specific and measurable objectives to improve service. For example, in the 2003 Annual Plan, the CFO was charged with addressing the existing weaknesses and conditions that were reported from previous audits. Specifically, the CFO is charged with improving the conditions that have contributed to the federal aid programs being included on GAO's list of high risk programs.[7] This task is intended to improve customer satisfaction, reduce costs, and improve program integrity.

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[7] According to ED's FY2002 *Performance and Accountability* Report, although FSA has made and continues to make considerable progress, the federal aid programs remain on GAO's list of high risk programs.

To measure customer satisfaction FSA utilizes the American Customer Satisfaction Index (ACSI), a survey developed by the University of Michigan. ACSI provides organizations with a score (0 to 100) that is based on customer satisfaction with the company's services. To ascertain its performance FSA surveyed 250 customers from each channel about specific practices and procedures. According to ED's Annual Program Performance report, FSA's last reported score was 72.9 for 2001; the average annual score for federal agencies is 68.9.[8]

Employee Satisfaction. The initial COO, Greg Woods, believed that employees had become mechanical in dealing with the work they were performing. He felt that many employees viewed their jobs as simply processing loan and grant papers, rather than helping their customers "realize their dreams." After he developed a mission statement "We help put America through school," he sought to ensure that all employees understood how their job contributed to the overall mission and became more dedicated to their work. Woods utilized FSA's score from a survey conducted by the National Performance Review (FSA ranked 33 out of the 49 participating federal agencies, in terms of how employees viewed the agency), as a benchmark to gauge the state of employee satisfaction when he arrived (Woods was the Director of NPR at the time the survey was conducted). The NPR survey also indicated that: only 60% of FSA employees were satisfied with their jobs, one out of four could not identify any of the organization's goals that related to satisfying customers, and half of the respondents indicated that they needed more training.[9]

One of the solutions FSA implemented to deal with the disconnect between employee's understanding of his/her position and the agency's overall mission was the use of *balanced scorecards*. Balanced scorecards enable the agency to retain traditional measures of success such as reduction of costs, and supplement them with non-traditional measures such as employee satisfaction. FSA's model consists of the original three measures of success — customer satisfaction, employee satisfaction and reduced unit costs — added together; the output is the performance score. It is expected that by placing equal emphasis upon each measure, all employees, including senior managers, will work to ensure success is achieved in all three areas. In addition to emphasizing balance, the scorecard also includes a roster of the names of all persons working on a particular project, the scores they received in previous years on each of the measures, and a delineated list of all projects that the team is working on. The scorecards are intended to provide a concise and unambiguous measure of how the group is performing and how each employee's work relates to the agency's mission. In 2000, FSA began utilizing the Gallup Survey of Workplace management instead of the previously used NPR survey. The last reported Gallup survey score for 2001 was 3.74 out of a possible 5 (the private sector average is 3.6).

Reducing Costs. Reducing costs is a measure of performance that did not exist at FSA prior to the agency being designated as a PBO. As previously noted, the financial aid programs have been listed on GAO's list of high risk programs since 1990. One of the main reasons the programs have been included is due to the high

[8] U.S. Department of Education, Strategic and Annual Reports at [http://www.ed.gov/about/reports/annual/index.html?src=ln].

[9] Brian Friel, "Great Expectations," *GovExec.com*, Mar. 1, 2000.

costs of administering the financial aid programs. As noted by **Table 1**, the administration costs have risen from $43.8 million in FY1992 to the current administration's FY2004 request for $947 million (for further discussion see following section). FSA has implemented several programs and procedures to assist with reducing costs, and two in particular have received significant attention: implementing a web-based version of the Free Application for Federal Student Aid (FAFSA), and reducing the multiple technology information systems used to administer the financial aid programs.

Table 1. Student Aid Administration Appropriations: Selected Years

(dollars in 000s)

	FY1992	FY1995	FY1998	FY2001	FY2004**
Student Aid Administration	$43,870	$345,660	$578,482	$875,634	$947,000

** Denotes President's requested amount, not the amount appropriated.

Free Application for Federal Student Aid on the Web. Students who are interested in applying for federal financial assistance and for many state forms of assistance must complete and submit the Free Application for Federal Student Aid (FAFSA). The FAFSA can be submitted via a web-based application, a paper form, or electronically with the assistance of a school financial aid administrator. The information that students and parents provide on the FAFSA is utilized to determine their eligibility for financial assistance.[10]

In an effort to reduce the costs associated with administering federal financial aid programs, a web-based financial aid application was introduced. The web-based application allows applicants to complete and submit their financial aid application online. In addition, the web-based application has internal end-of-entry data edits built into the application that eliminate many of the mistakes associated with the paper version. The internal edit system prevents applicants from omitting essential information that is used in calculating the expected family contribution and reduces the possibility of entering illogical information. For example, if a family has an adjusted gross income of $25,000, it is not possible to have paid the same amount in taxes; the internal edits force the applicant to resolve these inconsistencies prior to submitting the application. As a result, ED spends less money processing multiple applications and returning applications due to errors. In a draft Performance Plan for FSA, it was noted that electronic applications are as much as 25 times less likely to contain errors than paper applications.[11]

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[10] For more information on the need analysis system used to calculate eligibility see CRS Report RL32083, *Federal Student Aid Need Analysis: Background and Selected Simplification Issues*, by Adam Stoll and James B. Stedman.

[11] U.S. Department of Education, Office of Federal Student Aid, *The Performance Plan for Student Financial Assistance*, at [http://www.ed.gov/PDFDocs/5yrbody.pdf].

But the conversion to the web-based FAFSA has not gone smoothly. At the 2001 National Association of Student Financial Aid Administrators annual conference, the COO urged administrators to stop ordering so many paper applications and to instead direct their students to the Internet. Greg Woods stated that because colleges and universities continue to request the same quantities of paper applications as they had in previous years, students are not being encouraged to use the web-based application; this, in turn, prevents FSA from reducing the number of applications produced.[12] As a result of this and other contributing factors, such as increased student participation, the costs of administering the financial aid programs have actually increased. In a 2002 report by GAO,[13] FSA's unit costs[14] for FY1999 were $18.72 per aid recipient and in FY2001 (the most recent data available) the unit cost increased to $19.57.

Technology Systems. The addition of federal financial aid programs at different times produced multiple nonintegrated technology systems to operate the programs as well as multiple contractors to manage the systems. Because the systems are nonintegrated they cannot communicate with each other, which requires FSA to access multiple systems to retrieve accurate information for each applicant, and in many instances there is information redundancy. This is also true for the institutions utilizing these systems. Institutions are often required to access multiple systems to enter and retrieve student financial aid data for one student. In 1993, the National Student Loan Data System (NSLDS) was developed as a way to integrate these data and simplify the process. However, NSLDS functions as a repository for each of the separate databases as opposed to one integrated database. Because the systems cannot communicate with each other, each database must first be updated and then transferred to NSLDS, and with different contractors and different scheduled database updates, conflicting data are still a possibility.

Maintaining multiple systems with several contractors also significantly contributes to the costs of administering the financial aid programs. Rather than purchase one system that could manage all Title IV programs — an expensive alternative — FSA opted to utilize *middleware*. Middleware is a system that serves as a conduit between multiple technology systems, and enables them to communicate with each other. If used in conjunction with a web-based interface, middleware presents the user with an integrated view. One of the most important features of middleware is that data can be retrieved from multiple sources in a timely manner. FSA's technology modernization effort has taken several steps to achieve full integration and interoperability of existing systems. Thus far the actual savings of these efforts has not been fully realized or reported.[15]

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[12] Stephen Burd, "Education Department Official Prods Colleges to Have Students Apply for Aid Online," *The Chronicle of Higher Education*, Aug. 3, 2001.

[13] GAO, *Federal Student Aid*.

[14] FSA calculates unit costs as the amount of money spent on administering the financial aid programs divided by the number of recipients.

[15] For additional reading on middleware usage at FSA, see General Accounting Office report, *Student Financial Aid: Use of Middleware for Systems Integration Holds Promise*, GAO-02-7.

Rewarding Results

The Chief Operating Officer and the senior managers of FSA are authorized to receive bonuses for the achievement of the pre-specified goals and objectives discussed earlier. The COO's bonus is based on the Secretary's evaluation of his/her performance, and cannot exceed 50% of the base salary for the position. In addition, the COO's total annual compensation, including the bonus, cannot exceed the President's salary (currently $400,000). Senior level managers are also authorized to receive performance bonuses. Their total compensation, including locality pay, cannot exceed 125% of the maximum basic pay for members of the Senior Executive Service (currently base pay for ES-6 is $134,000). The bonuses serve as an incentive for the COO and all senior managers to insure adequate progress for their respective goals and those of the PBO.

FSA as a PBO: 5 Years Later

The Office of Federal Student Aid has functioned as a PBO for 5 years. During this period several issues have arisen regarding FSA's PBO status. This section presents a brief discussion of selected program and policy matters.

Policymaking and Promulgation Authority

Title I, Part D, Section 141(b) of the HEA states that the Secretary "shall maintain responsibility for the development and promulgation of policy and regulations relating to the programs of student financial assistance under Title IV." This language has been interpreted to define FSA's responsibilities as *programmatic* or *operational*, and ED's, or more specifically OPE's, as policy oriented. In the early development stages of the PBO, some concern was expressed that the delineated roles for the PBO and OPE were being blurred.[16] Offices, such as Guarantor and Lender Oversight Service, were moved to the PBO, although these offices clearly dealt with policy and promulgation. Subsequently, many of the offices were moved back to OPE; however, a few offices with policymaking and promulgation functions, such as institutional eligibility, remain in the PBO.

The Advisory Committee for Student Financial Assistance (ACSFA) contends that all policymaking functions should reside with OPE. In a letter to Senator Kennedy (January 10, 2002), ACSFA recommended that all policy functions should be returned to OPE, but that the Assistant Secretary of OPE should consult with FSA to ensure that proposed policy decisions support the operations of the financial aid programs. Alternatively, former Secretary Riley maintained that having the COO oversee interrelated tasks of student aid delivery such as program management and oversight enabled FSA to achieve "aggressive performance standards."[17]

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[16] Letter from Representatives Goodling, Hoekstra and McKeon, House Education and the Workforce Committee, to Secretary of Education Riley, Dec. 16, 1998.

[17] Letter from Secretary Riley to Chairman Goodling, Jan. 12, 1999.

Independence

In 2001, the change in administration, and the appointment of a new Secretary of Education introduced the question of how much independence FSA possesses. An article in the *Chronicle of Higher Education*,[18] describes a memorandum from Education Secretary Paige to the COO of FSA that prohibits the office from awarding contracts in excess of $100,000 or hiring senior-level employees and consultants without prior Department approval. Section 141(b)(4) grants the PBO independent control over its budget allocations and expenditures, personnel decisions and processes, procurement and other administrative functions; however, the PBO is also "subject to the direction of the Secretary."

To address the issue of independence, former Secretary Riley drafted a memorandum of understanding (MOU) that articulated the specific functions the PBO would oversee. In addition, the MOU details how the PBO interacts with other offices in ED. For example, because the COO has sole discretion over its personnel decisions, subject to the direction of the Secretary, a MOU between the COO and Secretary Riley specified that FSA could hire needed personnel, but must consult with the Department about changes that impact ED's collective bargaining agreement (See footnote 13). According to the aforementioned GAO report, employees of both FSA and ED admitted that the absence of a MOU between the two *under the current administration* has presented a struggle over the PBO's independence and how it fits into the agency's structure.

FAFSA on the Web

FSA promotes the usage of FAFSA on the web as a means of reducing the costs of administering the financial aid programs. In addition, because the web-based application provides an efficient and reliable way to complete and submit the financial aid application, institutions and applicants are strongly encouraged to utilize the online application. While the number of online filers continues to increase yearly, there are still numerous families that do not have access to the Internet. In a recent Pew Internet and American Life Survey (April 2003) it was found that individuals with lower incomes and less education are still significantly less likely to use the Internet. Students from families with lower incomes and less education are also more likely to need financial assistance to attend college. The Advisory Committee on Student Financial Assistance recommended that ED continue to make the paper FAFSA available.

> ED must continue to make the paper FAFSA available in a timely and efficient manner. First-generation college students and their families may be uncomfortable completing the web-based form and prefer to complete the paper form.[19]

The tension that the PBO confronts is between cost reduction and ensuring that the financial needs of low-income students are addressed.

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[18] "Rift Emerges Over Independence of Federal Financial-Aid Office," Oct. 19, 2001.

[19] Letter from Advisory Committee Chairperson, Dr. Juliet V. Garcia, to Senator Edward Kennedy, Jan. 10, 2002.