



COPY

September 18, 2008

Dr. C. Timothy Summerlin
President
Schreiner University
2100 Memorial Boulevard
Kerrville, TX 78028

Certified Mail
Return Receipt Requested

No. 7007 3020 0000 2584 6574

RE: **Program Review Report**
OPE ID: 00361000
PRCN: 200840626762

Dear Dr. Summerlin:

On February 21, 2008, the U.S. Department of Education (the Department) received a complaint about Schreiner University's compliance with the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (Clery Act). On March 5, 2008, the Department requested that Schreiner University respond to the issues raised in the complaint and to provide copies of certain institutional publications. Schreiner University responded on March 24, 2008.

The Department reviewed the information submitted by Schreiner University to determine the institution's compliance with the Clery Act. The findings of that review are presented in the enclosed report. Findings of noncompliance are referenced to the applicable statutes and regulations and specify the action required to comply with the statute and regulations. Please review the report and respond to each finding, indicating the corrective actions taken by Schreiner University. The institution's response should be sent directly to Jesus Moya of this office within 60 calendar days of the date of this letter.

Please refer to the above Program Review Control Number (PRCN) in all correspondence relating to this report. If you have any questions concerning this report, please contact Jesus Moya at (214) 661-9472 or jesus.moya@ed.gov.

Sincerely,

Janet Dragoo
Team Leader

Federal Student Aid, School Participation Team - Dallas
1999 Bryan St., Suite 1410, Dallas, TX 75201-6817
www.FederalStudentAid.ed.gov

FEDERAL STUDENT AID  START HERE. GO FURTHER.

Prepared for
Schreiner University



START HERE
GO FURTHER
FEDERAL STUDENT AID

OPE ID 00361000
PRCN 200840626762

Prepared by
U.S. Department of Education
Federal Student Aid
School Participation Team - Dallas

Program Review Report

September 18, 2008

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A. Institutional Information

Schreiner University
2100 Memorial Boulevard
Kerrville, TX 78028-5697

Type: Private nonprofit

Highest Level of Offering: Master's Degree or Doctor's Degree

Accrediting Agency: Southern Association of Colleges and Schools Commission on Colleges

Current Student Enrollment: 982 (Fall 2007)

% of Students Receiving Title IV: 80% (2007-2008)

Title IV Participation (source: PEPS):

	2006-2007
Federal Pell	\$ 959,259
Federal SEOG	\$ 130,311
Federal Work-Study	\$ 90,187
FFEL	\$ 5,860,910

Default Rate FFEL/DL:	2005	4.6%
	2004	6.0%
	2003	3.9%

B. Scope of Review

The U.S. Department of Education (the Department) received a complaint on February 21, 2008, about Schreiner University's compliance with the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (Clery Act). The Department requested that Schreiner University respond to the issues raised in the complaint and to provide copies of certain institutional publications for the purpose of conducting an off-site review.

The focus of the Department's review was to determine Schreiner University's compliance with the Clery Act with respect to the specific issues raised in the complaint.

Disclaimer:

Although the review was thorough, it cannot be assumed to be all-inclusive. The absence of statements in the report concerning the institution's specific practices and procedures must not be construed as acceptance, approval, or endorsement of those specific practices and procedures. Furthermore, it does not relieve Schreiner University of its obligation to comply with all of the statutory or regulatory provisions governing the Title IV, HEA programs. In addition, the Department reserves its right to pursue additional campus security related issues, to include examination of crime incident reports, at a future time.

This report reflects initial findings. These findings are not final. The Department will issue its final findings in a subsequent Final Program Review Determination letter.

C. Findings

During the review, several areas of noncompliance were noted. Findings of noncompliance are referenced to the applicable statutes and regulations and specify the actions to be taken by Schreiner University to bring operations of the financial aid programs into compliance with the statutes and regulations.

Finding 1. Failure to Accurately Report Crime Statistics – Excluded Incident

Citation: Institutions are required to publish and distribute, by October 1 of each year, an annual security report that contains required crime statistics, as well as required statements and policies, to its current students and employees. Institutions must also inform prospective students and employees of the report's availability and provide a copy upon request.

The annual security report must report crime statistics for the three most recent calendar years concerning the occurrence on campus, in or on noncampus buildings or property, and on public property of the following offenses:

- Criminal homicide (murder and nonnegligent manslaughter);
- Sex offenses (forcible sex offenses and nonforcible sex offenses);
- Robbery;
- Aggravated assault;
- Burglary;
- Motor vehicle theft;
- Arson;
- Arrests for liquor law violations, drug law violations, and illegal weapons possession; and
- Persons not included in the above category who were referred for campus disciplinary action for liquor law violations, drug law violations, and illegal weapons possession.

34 C.F.R. § 668.46 (the implementing regulations of the The Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act or Clery Act)

Noncompliance: Schreiner University failed to report one incident of a forcible sex offense for calendar year 2005 in its crime statistics for its October 1, 2006, and October 1, 2007, annual security reports.

The Department received a complaint on February 21, 2008, that Schreiner University had failed to include one incident of a forcible sex offense that occurred on or about January 22, 2005 in its crime statistics. One of the exhibits in the complaint was an article from *The Daily Times.com* dated February 1, 2007, that stated,

“[institutional official], vice president for administration and finance, oversees Schreiner’s security department. After hearing of the allegations in August 2005, [institutional official] requested that the family fill out a formal complaint and provide a copy of the police report.

‘Neither of these requests was ever met,’ [institutional official] said in the same written statement. ‘When approached by the Kerrville Police Department, we cooperated fully with their investigation.’”

On March 5, 2008, the Department requested that Schreiner University explain why the incident was excluded from its crime statistics. Schreiner University responded on March 24, 2008, that the incident was not reported because “the accuser or her parents” did not provide any details of the incident to Schreiner University. Further, Schreiner University stated that the complaint to the Department “appears to be an effort to harass and intimidate Schreiner....”

Schreiner University was informed by Kerrville Police Department in 2005 that an alleged forcible sex-offense had occurred in one of its residence halls. Although the victim and her family did not cooperate with Schreiner University by filling out a

complaint form, or otherwise directly providing details to Schreiner University, this lack of cooperation did not relieve Schreiner University of its obligation to report the incident. For Clery Act purposes, an incident is considered to be reported to an institution when it is brought to the attention of campus police, security, or other campus security authority.

An institution may only exclude incidents which have been officially unfounded (i.e., a determination was made by a law enforcement authority that an incident did not occur). In this specific case, the Kerrville Police Department classified the case as "suspended." Therefore, unless the Kerrville Police Department determined that the alleged incident did not occur, Schreiner University was obligated to report the incident.

For crime statistics reporting purposes, 34 CFR § 668.46(c)(2) states that "An institution must record a crime statistic in its annual security report for the calendar year in which the crime was reported to a campus security authority." Further, it is the Department's position (per *The Handbook for Campus Crime Reporting*) that institutions are required to report offenses even if such information comes from calls for service, complaints or investigations.

An institution may not exclude an incident about which it is aware simply because a formal process was not properly followed. When the Kerrville Police Department contacted Schreiner University officials with responsibility over campus security about this incident in 2005, the crime statistics reporting requirement was met.

Required Action: Schreiner University must immediately revise its crime statistics to include the forcible sex offense that occurred in one of its residence halls on or about January 22, 2005. The forcible sex offense must be reported as a statistic for calendar year 2005 because that is the year in which Schreiner University was informed of the offense.

In addition, Schreiner University must review its information to determine if other reportable incidents were excluded because a victim or other party did not directly provide details to Schreiner University or did not follow a prescribed procedure. Schreiner University must provide this office with the results of its review.

Schreiner University must also develop and submit to this office a policy that ensures that all reportable incidents are included in its crime statistics. This policy must require that all institutional officials who fall under the definition of "campus security authority," as defined in 34 C.F.R. 668.46(a), are informed of their responsibility to notify the office responsible for compiling statistics of any and all reportable incidents.

Finding 2. Failure to Accurately Report Crime Statistics – Crime Categories

Citation: Institutions are required to publish and distribute, by October 1 of each year, an annual security report that contains required crime statistics, as well as required statements and policies, to its current students and employees. Institutions must also inform prospective students and employees of the report's availability and provide a copy upon request.

The annual security report must report crime statistics for the three most recent calendar years concerning the occurrence on campus, in or on noncampus buildings or property, and on public property of the following offenses:

- Criminal homicide (murder and nonnegligent manslaughter)
- Sex offenses (forcible sex offenses and nonforcible sex offenses)
- Robbery
- Aggravated assault
- Burglary
- Motor vehicle theft
- Arson
- Arrests for liquor law violations, drug law violations, and illegal weapons possession
- Persons not included in the above category who were referred for campus disciplinary action for liquor law violations, drug law violations, and illegal weapons possession

Institutions must comply with the campus security requirements for each separate campus. *34 C.F.R. § 668.46 (the implementing regulations of the The Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act or Clery Act)*

Noncompliance: Schreiner University did not publish its website crime statistics in the required categories or geographic locations.

Although Schreiner University submitted crime statistics to the Department in the required categories and geographic locations, it did not use those categories or locations when it published crime statistics for its students and employees.

http://www.schreiner.edu/security/campus_crime_stats.html

Sex Offenses

Schreiner University used the following incorrect categories for sexual offenses:

Forcible Rape
Non-forcible Rape

These two categories are too narrow for the purpose of complying with the Clery Act. The correct categories are:

Sex Offenses - Forcible
Sex Offenses - Non-forcible

The category "Sex Offenses – Forcible" includes four types of offenses: forcible rape, forcible sodomy, sexual assault with an object, and forcible fondling. The category "Sex Offenses – Non-Forcible" includes two types of offenses: incest and statutory rape.

By using the category "Forcible Rape," Schreiner University may be inappropriately excluding other types of forcible sex offenses.

Criminal Homicide

Schreiner University also incorrectly uses categories for criminal homicide. On its website, the following categories are used:

Murder & Non-negligent Manslaughter
Murder & Negligent Manslaughter

The two correct criminal homicide categories that must be used are:

Murder
Non-negligent manslaughter

Hate Crimes

Schreiner University did not publish hate crime statistics. Institutions are required to include hate crime statistics by category of prejudice and geographic location. The categories of prejudice that must be disclosed for Clery Act purposes are:

- Race
- Gender
- Religion
- Sexual Orientation
- Ethnicity/National Origin
- Disability

Institutions are required to make a case-by-case assessment of the facts to determine if an incident was a hate crime (i.e., the perpetrator was motivated by a prejudice to commit the crime). The hate crime categories that must be reported are:

- Criminal homicide (murder and nonnegligent manslaughter)
- Sex offenses (forcible sex offenses and nonforcible sex offenses)
- Robbery
- Aggravated assault
- Burglary

- Motor vehicle theft
- Arson
- Any other crime involving bodily injury reported to local police agencies or to a campus security authority.

See additional discussion on geographic location reporting below.

Geographic Location Reporting

Schreiner University does not include residence hall crime statistics in its website information. In addition, Schreiner University does not post hate crime information. Institutions are required to report criminal offense crime statistics for:

On campus
On campus – Residence Halls
Noncampus
Public Property

Hate Crimes - On campus
Hate Crimes - On campus – Residence Halls
Hate Crimes - Noncampus
Hate Crimes - Public Property

Liquor Law, Drug Abuse and Weapons Possession

Schreiner University combines arrests and disciplinary referrals for liquor law violations, drug abuse and weapons possessions. Institutions are required to report these statistics separately, as follows:

Arrests – On Campus
Illegal Weapons Possession
Drug Law Violations
Liquor Law Violations

Arrests – On Campus – Residence Halls
Illegal Weapons Possession
Drug Law Violations
Liquor Law Violations

Arrests – Noncampus
Illegal Weapons Possession
Drug Law Violations
Liquor Law Violations

Arrests – Public Property
Illegal Weapons Possession

Drug Law Violations
Liquor Law Violations

Disciplinary Action – On Campus
Illegal Weapons Possession
Drug Law Violations
Liquor Law Violations

Disciplinary Action – On Campus – Residence Halls
Illegal Weapons Possession
Drug Law Violations
Liquor Law Violations

Disciplinary Action – Noncampus
Illegal Weapons Possession
Drug Law Violations
Liquor Law Violations

Disciplinary Action – Public Property
Illegal Weapons Possession
Drug Law Violations
Liquor Law Violations

Required Action: Schreiner University must immediately correct the crime statistics it publishes to ensure that the proper crime categories and geographic locations, as noted above, are provided to its students and employees. Schreiner University must inform this office when the corrections are made and provide this office with a copy of the corrections or a link to the corrected data.

Schreiner University must also immediately review its records to determine if:

- incidents involving forcible sodomy, sexual assault with an object, and forcible fondling were improperly excluded from the “forcible rape” statistic reported to the Department,
- its reporting for “nonforcible rape” accurately reflects the category “non-forcible sex offenses,” and
- any of its criminal incidents were hate crimes.

Schreiner University must immediately correct any errors to its crime statistics and must submit to this office the results of the reviews required above.

Finding 3. Failure to Include Required Statements

Citation: Institutions are required to publish and distribute, by October 1 of each year, an annual security report that contains required crime statistics, as well as required statements and policies, to its current students and employees. Institutions must also inform prospective students and employees of the report's availability and provide a copy upon request.

The annual security report must contain a number of required statements, including, *but not limited to*, the following:

- A statement of policy regarding the institution's campus sexual assault programs to prevent sex offenses, and procedures to follow when a sex offense occurs.
- A statement advising the campus community where law enforcement agency information provided by a State under section 170101(j) of the Violent Crime Control and Law Enforcement Act of 1994 (42 U.S.C. 14071(j)), concerning registered sex offenders may be obtained, such as the law enforcement office of the institution, a local law enforcement agency with jurisdiction for the campus, or a computer network address.

A complete list of required statements is provided in Appendix A. *34 C.F.R. § 668.46 (the implementing regulations of the The Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act or Clery Act)*

Noncompliance: Schreiner University's website on campus security (<http://www.schreiner.edu/security/index.html>) does not include any policies concerning sexual assault, as required. Such information must be part of an institution's annual security report, whether such a report is a published document or posted on a website.

We note that Schreiner University's Handbook discusses "sexual misconduct" and does have a section on Sexual Assault. However, to be in compliance with the Clery Act, such information needs to be provided along with all the other required policies and statements in the institution's annual security report.

Required Action: Schreiner University must inform this office of how it will comply with the requirement that it produce an annual security report that contains all required policies and statements.

Appendix A – Campus Security Checklist

Campus Security Checklist			
Annual Security Report – Required Policies and Statements			
Required Policies	Meets Requirement		
	Y	N	N/A
34 C.F.R. 668.46(b) An institution must prepare an annual security report that contains, at a minimum, the following information:			
(1) Crime statistics (as described in 668.46 (c)(1)). (Detailed in the Required Crime Statistics checklist.)			
(2) A statement of current campus policies regarding procedures for students and others to report criminal actions or other emergencies occurring on campus. This statement must include the institution’s policies concerning its response to these reports, including:			
(i) Policies for making timely warning reports to members of the campus community regarding the occurrence of crimes (as described in 668.46 (c)(1)).			
(ii) Policies for preparing the annual disclosure of crime statistics.			
(iii) A list of the titles of each person or organization to whom students and employees should report the criminal offenses described in 668.46 (c)(1) for the purpose of making timely warning reports and the annual statistical disclosure. This statement must also disclose whether the institution has any policies or procedures that allow victims or witnesses to report crimes on a voluntary, confidential basis for inclusion in the annual disclosure of crime statistics, and, if so, a description of those policies and procedures.			
(3) A statement of current policies concerning security of and access to campus facilities, including campus residences, and security considerations used in the maintenance of campus facilities.			

Required Policies	Meets Requirement		
	Y	N	N/A
(4) A statement of current policies concerning campus law enforcement that:			
(i) Addresses the enforcement authority of security personnel, including their relationship with State and local police agencies and whether those security personnel have the authority to arrest individuals;			
(ii) Encourages accurate and prompt reporting of all crimes to the campus police (if any) and the appropriate police agencies; and			
(iii) Describes procedures, if any, that encourage pastoral counselors and professional counselors, if and when they deem it appropriate, to inform the persons they are counseling of any procedures to report crimes on a voluntary, confidential basis for inclusion in the annual disclosure of crime statistics			
(5) A description of the type and frequency of programs designed to inform students and employees about campus security procedures and practices and to encourage students and employees to be responsible for their own security and the security of others.			
(6) A description of programs designed to inform students and employees about the prevention of crimes.			
(7) A statement of policy concerning the monitoring and recording through local police agencies of criminal activity in which students engaged at off-campus locations of student organizations officially recognized by the institution, including student organizations with off- campus housing facilities.			
(8) A statement of policy regarding the possession, use, and sale of alcoholic beverages and enforcement of State underage drinking laws.			

Required Policies	Meets Requirement		
	Y	N	N/A
(9) A statement of policy regarding the possession, use, and sale of illegal drugs and enforcement of Federal and State drug laws.			
(10) A description of any drug or alcohol-abuse education programs, as required under section 120(a) through (d) of the HEA. For the purpose of meeting this requirement, an institution may cross-reference the materials the institution uses to comply with section 120(a) through (d) of the HEA.			
(11) A statement of policy regarding the institution's campus sexual assault programs to prevent sex offenses, and procedures to follow when a sex offense occurs. The statement must include:			
(i) A description of educational programs to promote the awareness of rape, acquaintance rape, and other forcible and non-forcible sex offenses;			
(ii) Procedures students should follow if a sex offense occurs, including procedures concerning who should be contacted, the importance of preserving evidence for the proof of a criminal offense, and to whom the alleged offense should be reported;			
(iii) Information on a student's option to notify appropriate law enforcement authorities, including on-campus and local police, and a statement that institutional personnel will assist the student in notifying these authorities, if the student requests the assistance of these personnel;			
(iv) Notification to students of existing on- and off-campus counseling, mental health, or other student services for victims of sex offenses;			

Required Policies	Meets Requirement		
	Y	N	N/A
(v) Notification to students that the institution will change a victim's academic and living situations after an alleged sex offense and of the options for those changes, if those changes are requested by the victim and are reasonably available;			
(vi) Procedures for campus disciplinary action in cases of an alleged sex offense, including a clear statement that:			
(A) The accuser and the accused are entitled to the same opportunities to have others present during a disciplinary proceeding; and			
(B) Both the accuser and the accused must be informed of the outcome of any institutional disciplinary proceeding brought alleging a sex offense; and			
(vii) Sanctions the institution may impose following a final determination of an institutional disciplinary proceeding regarding rape, acquaintance rape, or other forcible or non-forcible sex offenses.			
(12) Effective October 1, 2003, a statement advising the campus community where law enforcement agency information provided by a State under section 170101(j) of the Violent Crime Control and Law Enforcement Act of 1994 (42 U.S.C. 14071(j)), concerning registered sex offenders may be obtained, such as the law enforcement office of the institution, a local law enforcement agency with jurisdiction for the campus, or a computer network address.			

Campus Security Checklist		
Annual Security Report – Required Crime Statistics		
Required Category	Meets Requirement	
	Y	N
34 C.F.R. 668.46 (c)(1) Crime Statistics. Crimes that must be reported. An institution must report statistics for the three most recent calendar years concerning the occurrence on campus, in or on non-campus buildings or property, and on public property of the following that are reported to local police agencies or to a campus security authority:		
(i) Criminal homicide:		
(A) Murder and non-negligent manslaughter.		
(B) Negligent manslaughter.		
(ii) Sex offenses:		
(A) Forcible sex offenses.		
(B) Non-forcible sex offenses.		
(iii) Robbery.		
(iv) Aggravated assault.		
(v) Burglary.		
(vi) Motor vehicle theft.		
(vii) Arson.		
(viii) Liquor law violations		
(A) Arrests for liquor law violations, drug law violations, and illegal weapons possession.		
(B) Persons not included in paragraph (c)(1)(viii)(A) of this section, who were referred for campus disciplinary action for liquor law violations, drug law violations, and illegal weapons possession.		
Does the institution determine if any crimes in the above categories are hate crimes?		
Does the institution report by category of prejudice (actual or perceived race, gender, religion, sexual orientation, ethnicity or disability)?		

Program Review Report/Expedited Determination Letter Checklist	
Responsible Reviewer: Jesus Moya	Return #:
Institution Name: Schreiner University	
OPE ID: 00361000	PRCN: 200840626762
Date: 09/15/2008	
Cover Letter	
<input checked="" type="checkbox"/>	Letter is addressed to the correct person.
<input checked="" type="checkbox"/>	Letter includes certified mail information.
<input checked="" type="checkbox"/>	For Program Review Report: Letter includes appropriate due date for institution's response.
Program Review Report/EDL	
<input checked="" type="checkbox"/>	Report/EDL was prepared in accordance with standard procedures.
<input checked="" type="checkbox"/>	Citations are appropriate to the findings and cited correctly.
<input checked="" type="checkbox"/>	Description of each instance of noncompliance is sufficiently detailed to clearly identify the institution's regulatory violations.
<input checked="" type="checkbox"/>	Required actions are appropriate to the violation.
<input checked="" type="checkbox"/>	Actions required of the institution are sufficiently detailed and clear.
<input checked="" type="checkbox"/>	Student Sample Appendix is properly prepared.
<input checked="" type="checkbox"/>	Other appendices, if any, are properly prepared.
PEPS Data Entry Worksheet	
<input checked="" type="checkbox"/>	Deficiency codes are appropriate to the findings.
Work Papers	
<input checked="" type="checkbox"/>	Work plan was followed.
<input checked="" type="checkbox"/>	Changes to the work plan were properly documented.
<input checked="" type="checkbox"/>	Any modifications/additions to the original student sampling were properly documented.
<input checked="" type="checkbox"/>	Documents in the work papers support the findings.
TL Signature: <i>Janet B. Drago</i>	Date: <i>9/18/08</i>
For EDLs: ACD Signature:	Date:

Program Review Work Plan	
Name of Institution	Schreiner University
City, State	Kerrville, TX
OPE ID	00361000
Statutory Authority (Section 498A of the HEA)	
Check all boxes that apply.	
X	(1) Reviews determined necessary by SEC (management mandated, data analysis driven, etc.)
	(2 A) Institutions with a cohort default rate for Title IV loans in excess of 25 percent or which places such institutions in the highest 25 percent of such institutions
	(2 B) Institutions with a default rate in dollar volume for Title IV which places the institutions in the highest 25 percent of such institutions
	(2 C) Institutions with a significant fluctuation in Federal Stafford Loan volume, Federal Direct Stafford/Ford Loan volume, or Federal Pell Grant award volume, or any combination thereof, in the year for which the determination is made, compared to the year prior to such year, that are not accounted for by changes in the Federal Stafford Loan program, the Federal Direct Stafford/Ford Loan program, or the Federal Pell Grant program, or any combination thereof
	(2 D) Institutions reported to have deficiencies or financial aid problems by the State licensing or authorizing agency, or by the appropriate accrediting agency or association
	(2 E) Institutions with high annual drop out rates
	(2 F) Such other institutions that the Secretary determines may pose a significant risk of failure to comply with the Title IV administrative capability or financial responsibility provisions (As detailed under <i>Purpose for Review</i> below.)

Purpose for Review	
<p>The purposes of the program review are to determine if any failure to comply with the Title IV administrative capability or financial responsibility provisions has exposed federal funds to any unauthorized use, to quantify the financial loss that is attributable to that exposure and to assist the institution in improving its administration of the Title IV programs. List case team inputs, issues identified from reviewer research, and issues identified from review of information from the institution.</p> <ul style="list-style-type: none"> • Complaint from advocacy group – campus security • • 	
X	Check the box if possible serious negative outcome requiring referral to AAAD, OIG or restricted method of payment.
Scope of Review	
<p>Check either the "General Assessment" or the "Focused" box and list below those activities to be conducted in addition to the general assessment or focus review standards that relate to and specifically address each reason/concern identified under <i>Purpose for Review</i> above.</p>	
	General Assessment:
<ul style="list-style-type: none"> • • • 	
	Focused:
<ul style="list-style-type: none"> • Campus security – excluded forcible sex offense incident • Campus security policies and procedures • 	
Modification to Scope of Review	

Describe any changes to the scope of the review made during the course of the review. Provide the rationale for the changes.

Upon review of the Schreiner University's March 24, 2008, response to the Department's March 5, 2008, letter requesting information on a complaint about an excluded forcible sex offense in its crime statistics, a decision was made that the program review process (off-site, focused) would be followed to resolve the complaint as sufficient information was available to determine that findings of non-compliance with Clery Act requirements existed. In this particular case, a letter closing out the complaint would not have been sufficient.

An announcement letter was not sent – the March 5, 2008, letter requesting information about the complaint serves in lieu of such.

An agenda was not generated and none of the preliminary research steps were taken.

Approval Obtained from TL Date 9/15/08 *gd*

Sample Selection

Award Years

Indicate the award years to be reviewed.

Calendar Year 2005

Data Source(s)

Indicate the data source(s) for the sample(s). (NSLDS, institutional data, other):

Schreiner data/information, newspaper article, complainant information.

Population

Describe the student population from which sample(s) were chosen (all Title IV recipients or specific subgroup—e.g., all withdrawn students, all students selected for verification, etc.):

N/A – crime statistics not reviewed.

Sampling Methodology

Describe the sampling methodology used (e.g., random sample, compliance initiative driven, other).

N/A -- crime statistics not reviewed.

Review Execution

	On-site	X	Off-site
X	Announced		Unannounced

List source and summary documents to be reviewed in addition to those required for review of critical or PEAT elements.

- Schreiner University website, catalogs, handbooks
-
-

List documents to photocopy in addition to the standard list.

- N/A
-
-

Logistical considerations (e.g., multiple sites, off-site administrative offices, third-party servicer, off-site student/staff interviews, etc.) Off-site

List each site to be visited:

N/A

Staffing considerations (e.g., specific expertise, additional staff, etc.)

One reviewer plus input from campus-security experts and PIP

Lead Reviewer:	Jesus Moya
Reviewer(s):	
Other resources:	James Moore, Philadelphia SPT
Duration of review: Indicate anticipated duration for the review based upon the scope, complexity, and logistical considerations of the review.	
Planned start date:	07/25/2008

Actual start date:	07/25/2008
--------------------	------------

(Attach additional pages if more space is needed)

Approval

I have reviewed and approved the work plan.

Janet B. Daggoc

Team Leader Signature

9/13/08

Date

I have reviewed and approved the revised work plan.

Team Leader Signature

Date